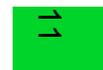


THE SURREY PENSION FUND COMPLIANCE WITH THE PENSION REGULATOR “CODE OF PRACTICE NO.14: GOVERNANCE AND ADMINISTRATION OF PUBLIC SECTOR PENSION SCHEMES” (ISSUED 1 APRIL 2015)

1. Governing your scheme

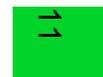
- (a) Knowledge and understanding required by pension board members
- (b) Conflicts of interest and representation
- (c) Publishing information about schemes

(a) Knowledge and understanding required by the Local Pension Board				
tPR Code of practice 14 reference no:	Scheme manager requirement	Should/ Must	Overriding legislation	Scheme manager compliance and responsible officer
37	Take account of tPR practical guidance	Should	Not applicable	Action: Include as part of training Responsible officer: The Senior Specialist Advisor
38	Establish and maintain policies and arrangements for acquiring and retaining knowledge and understanding and understanding to support their pension board members. Schemes should designate a person to take responsibility for ensuring that a framework is developed and implemented.	Should	Not applicable	Through the <i>Local Pension Board Attendance and knowledge and understanding policy</i> . Responsible officer: The Senior Specialist Advisor
46	Prepare and keep an updated list of the documents with which it is considered pension board members need to be conversant. This will enable them to	Should	Not applicable	Action: Provide clear visibility and availability of information regarding:



	<p>effectively carry out their role. Also, ensure that both the list and the documents are available in accessible formats.</p>			<ul style="list-style-type: none">• Conflicts of interest and the register of interests• Record keeping• Internal Dispute Resolution Procedure (IDRP)• Reporting breaches• Maintaining contributions to the scheme• The appointment of Local Pension Board (LPB) members• Risk assessments/ management and risk register policies for the scheme• Scheme booklets, announcements and key member and employer communications, which describe policies and procedures• The roles, responsibilities and duties of the scheme manager, pension board and individual pension board members• Terms of reference, structure and operational policies of the pension fund board and/or any sub-committee• Statements of policy
--	---	--	--	--

				<p>about the exercise of discretionary functions</p> <ul style="list-style-type: none"> • Statements of policy about communications with members and scheme employers • The pension administration strategy • Admission policies • Statement of investment principles and funding strategy statement • Employer contribution rates • Statements of assurance • Third party contracts and Service level agreements (SLAs) • Stewardship reports • Annual reports and accounts • Audit reports • Governance compliance statements <p>Responsible officer: The Senior Specialist Advisor</p>
48	Assist individual pension board members to determine the degree of knowledge and understanding that is sufficient for them to effectively carry out their role, responsibilities and duties as a pension board member	Should	Not applicable	<p>Through the <i>Attendance and knowledge and understanding policy</i>.</p> <p>Responsible officer: The Senior Specialist Advisor</p>



(b) Conflicts of interest and representation				
tPR Code of practice 14 reference no:	Scheme manager requirement	Should/ Must	Overriding legislation	Scheme manager compliance and responsible officer
73	Provide clear guidance on the roles responsibilities and duties of the pension boards and board members in scheme documentation. This should cover, for example, whether they have responsibility for administering or monitoring administration of the scheme; developing, delivering or overseeing compliance with requirements for governance and/or administration policies; and taking or scrutinising decisions relating to governance and/or administration.	Should	The Public Service Pension Act 2013	Through the <i>Local Pension Board Terms of Reference</i> . Responsible officer: The Senior Specialist Advisor
76	An agreed and documented conflicts policy and procedure, which includes identifying, monitoring and managing potential conflicts of interest. They should keep this under regular review. Policies and procedures should include examples of scenarios giving rise to conflicts of interest, how a conflict might arise specifically in relation to a pension board member and the process that pension board members and scheme managers should follow to address a situation where board members are subject to a potential of actual conflict of interest.	Should	Not applicable	Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i> . Responsible officer: The Senior Specialist Advisor

77	<p>Consider potential conflicts of interest in three stages:</p> <ul style="list-style-type: none"> • Identifying • Monitoring, and • managing 	Should	Not applicable	<p>Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i>.</p> <p>Responsible officer: The Senior Specialist Advisor</p>
78	<p>Cultivate a culture of openness and transparency. Recognise the need for continual consideration of potential conflicts. Disclosure of interests which have the potential to become conflicts of interest should not be ignored. Pension board members should have a clear understanding of their role and the circumstances in which they may find themselves in a position of conflict of interest. They should know how to manage potential conflicts.</p>	Should	Not applicable	<p>Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i>.</p> <p>Responsible officer: The Senior Specialist Advisor</p>
80	<p>Ensure that pension board members are appointed under procedures that require them to disclose any interests, including other responsibilities, which could become conflicts of interest and which may adversely affect their suitability for the role before they are appointed.</p>	Should	Not applicable	<p>Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy and the Local Pension Board Conflict of Interests Declaration</i>.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
82	<p>Take time to consider what important matters or decisions are likely to be considered during, for example, the year ahead and identify and consider any potential or actual conflicts of interest that may arise in the future. Pension board members should be notified as soon as possible and mitigations should be put in</p>	Should	Not applicable	<p>Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy and the Local Pension Board Conflict of Interests Declaration</i>.</p> <p>Responsible officer: The Strategic Finance Manager –</p>

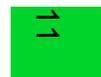




	place to prevent these conflicts from materialising.			Pension Fund and Treasury
83	As part of the risk assessment, identify, evaluate and manage dual interests which have the potential to become conflicts of interest and pose a risk to the scheme and possibly members, if they are not mitigated. Evaluate the nature of any dual interests and assess the likely consequences were a conflict of interest to materialise.	Should	Not applicable	Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy and the Local Pension Board Conflict of Interests Declaration</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
84	Manage a register of interests and capture decisions about how to manage potential conflicts of interest in risk registers, which are circulated to the pension board for ongoing review and published.	Should	Not applicable	Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy and the Local Pension Board Conflict of Interests Declaration</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
86	Establish and operate procedures which ensure that pension boards are not compromised by potentially conflicted members. Consider and determine the roles and responsibilities of pension boards and board members carefully to ensure that conflicts of interest do not arise, nor are perceived to have arisen.	Should	Not applicable	Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
87	Be open and transparent about the way potential conflicts of interest are managed.	Should	Not applicable	Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury

88	Consider obtaining professional legal advice when seeking to prevent a potential conflict of interest becoming detrimental to the conduct or decisions of the pension board.	Should	Not applicable	Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
91	Arrangements designed with regards to the principles of proportionality, fairness and transparency, and with the aim of ensuring that a pension board has the right balance of skills, experience and representation (for example, of membership categories of employers participating in the scheme).	Should	Not applicable	Through the <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i> . Responsible officer: The Senior Specialist Advisor

(c) Publishing information about schemes				
tPR Code of practice 14 reference no:	Scheme manager requirement	Should/ Must	Overriding legislation	Scheme manager compliance and responsible officer
92 & 93	Publish information about the pension board for the scheme(s) and keep the information up to date. Including who the members of the pension board are, representation on the board of members of the scheme and the matters falling within the pension board's responsibility.	Must	The Public Service Pension Act 2013	Action: Publish on the Surrey Fund website (when appointment has been confirmed) (update the Communications Policy Statement). Responsible officer: The Senior Specialist Advisor
96	Publish useful related information about the pension board such as: <ul style="list-style-type: none"> The employment and job title (where relevant) and any other relevant position held by each 	Should	Not applicable	Action: Publish on the Surrey Fund website (when appointment has been confirmed) (update the Communications Policy





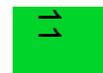
	<p>board member;</p> <ul style="list-style-type: none"> • The pension board appointment process; • Who each pension board member represents; • The full terms of reference for the pension board, including details of how it will operate, and • Any specific roles and responsibilities of individual pension board members. 			<p>Statement).</p> <p>Responsible officer: The Senior Specialist Advisor</p>
97	<p>Consider publishing information about pension board business, for example, board papers, agendas and minutes of meetings (redacted to the extent that they contain confidential information and/or data covered by the Data Protection Act 1998). Consider any requests for additional information to be published, in order to encourage scheme member engagement and promote a culture of transparency.</p>	Should	Not applicable	<p>Action: Publish on the Surrey Fund website (when appointment has been confirmed) (update the Communications Policy Statement).</p> <p>Responsible officer: The Senior Specialist Advisor</p>
98	<p>Ensure that information published about the pension board is kept up to date.</p>	Must	The Public Service Pension Act 2013	<p>Action: To include in the Pension Fund Business Plan.</p> <p>Responsible officer: The Senior Specialist Advisor</p>
98	<p>Have policies and processes to monitor all published data on an ongoing basis to ensure it is accurate and complete.</p>	Should	The Public Service Pension Act 2013	<p>Action: To include in the Pension Fund Business Plan.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>

99	Comply with any other legal requirements relating to the publication of information about governance and administration.	Must	The Public Service Pension Act 2013	<p>Action: To include in the Pension Fund Business Plan.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
----	--	------	-------------------------------------	---

2. Managing risks

(a) Internal controls

(a) Internal controls				
tPR Code of practice 14 reference no:	Scheme manager requirement	Should/ Must	Overriding legislation	Scheme manager compliance and responsible officer
101	Establish and operate internal controls that are adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules and in accordance with the requirements of the law.	Must	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
105	Address significant risks which are likely to have a material impact on the scheme.	Must	The Pensions Act 2004	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
105	Employ a risk-based approach and ensure that sufficient time and attention is spent in	Should	The Pensions Act 2004	Through the Pension Fund Risk Management Process delivered





	identifying, evaluating and managing risks and developing and monitoring appropriate controls.			through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
106	Carry out a risk assessment before implementing an internal controls framework which: <ul style="list-style-type: none"> • Sets the objectives of the scheme; • Determines the various functions and activities carried out in the running of the scheme and • Identifies the main risks associated with those objectives. 	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
107	When identifying risks, refer to relevant sources of information, such as records of internal disputes and legislative breaches, the register of interests, internal and external audit reports and service contracts.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
108	Once risks are identified record in a risk register which is regularly reviewed. Keep appropriate records to help scheme managers demonstrate steps they have taken to comply with legal requirements.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
109	Prioritise risks and focus on those areas where the impact and likelihood of a risk materialising is high.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk</i>

				<p><i>Register.</i></p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
110	Review existing arrangements and procedures to determine whether they can prevent and detect errors in scheme operations and help mitigate pension scheme-related risks.	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register.</i></p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
111	Consider what internal controls are appropriate to mitigate the main risks identified and how best to monitor them. For example establish and operate internal controls that regularly assess the effectiveness of investment related decision making and establish and operate internal controls that regularly assess the effectiveness of data management and record-keeping.	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register.</i></p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
112	Consider a number of issues when designing internal controls to manager risks: <ul style="list-style-type: none"> • How the control is to be implemented and the skills of the person performing the control; • The level of reliance that can be placed on information technology solutions where processes are automated; • Whether a control is capable of preventing future recurrence or 	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register.</i></p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>





	<p>merely detecting an event that has already happened;</p> <ul style="list-style-type: none">• The frequency and timeliness of a control process;• How the control will ensure that data are managed securely;• The process for flagging errors or control failures and approval and authorisation controls.			
114	<p>Put in place systems and processes for making an objective assessment of the strength of an employer's covenant.</p>	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
115	<p>Review the adequacy of internal controls in:</p> <ul style="list-style-type: none">• Mitigating risks;• Supporting long-term strategic aims;• Identifying successes (or otherwise) in achieving agreed objectives;• Providing a framework against which compliance with the scheme regulations and legislation can be monitored.	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
116	<p>Provide that internal or external audits/ or quality assurance processes ensure that adequate internal controls are in place when substantial changes take place.</p>	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p> <p>Responsible officer: The</p>

				Strategic Finance Manager – Pension Fund and Treasury
119	Ensure that third party providers can demonstrate that they have adequate and effective internal controls.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
120	Consider including provisions in contracts for outsourced services requiring compliance with appropriate standards.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury

3. Administration

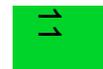
- (a) Scheme record keeping
- (b) Maintaining contributions, and
- (c) Providing information to members

(a) Scheme record keeping				
tPR Code of practice 14 reference no:	Scheme manager requirement	Should/ Must	Overriding legislation	Scheme manager compliance and responsible officer
122	Keep records of information relating to: <ul style="list-style-type: none"> • Member information; • Transactions; • Pension board meetings and 	Must	The Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014	Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as</i>



	decisions.			<p><i>the administering authority to the Surrey Pension Fund</i></p> <p>Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Senior Specialist Advisor, The Pension Services Manager</p>
124	Demonstrate to the regulator, where required, that accurate, up-to-date and enduring records are kept to able the pension scheme to be governed and administered efficiently.	Should	Not applicable	<p>Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund</i></p> <p>Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Senior Specialist Advisor, The Pension Services Manager</p>
125	Establish and operate adequate internal controls including processes and systems to support record-keeping requirements and ensure that they are effective at all times.	Must	The Pensions Act 2004	<p>Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund</i></p> <p>Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Senior Specialist Advisor, The Pension Services Manager</p>
126	Ensure that member data across all membership categories specified in the Record Keeping Regulations is complete	Must	The Public Service Pension Act 2013, The Public Service Pensions	Through the <i>Service level agreement between the pension investment/administration team</i>

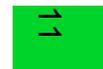
	and accurate.		(Record Keeping and Miscellaneous Amendments) Regulations 2014, The Data Protection Act 1998	<i>and Surrey County Council as the administering authority to the Surrey Pension Fund</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Senior Specialist Advisor, The Pension Services Manager
127	Keep specific member data, which will enable them to uniquely identify a scheme member and calculate benefits correctly.	Must	The Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014,	Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Senior Specialist Advisor, The Pension Services Manager
127	Provide members with accurate information regarding their pension benefits in accordance with legislative requirements, as well as pay the right benefits to the right person at the right time.	Must	The Public Service Pension Act 2013, The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Senior Specialist Advisor, The Pension Services Manager
128	Require participating employers to provide them with timely and accurate data in	Should	Not applicable	Through the <i>Pension Administration Strategy</i>





	order to fulfil legal obligations.			Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager
129	Seek to ensure that employers understand the main events which require information about members to be passed from the employer to the scheme or other employer.	Should	Not applicable	Through the <i>Pension Administration Strategy</i> Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager
130	Ensure that appropriate procedures and timescales are in place for scheme employers to provide updated information when member data changes, for checking scheme data against employer data and for receiving information which may affect the profile of the scheme. Report breaches of the law to the regulator if an employer fails to act according to statutory duty.	Should	Not applicable	Through the <i>Pension Administration Strategy</i> Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager
131	Trace the flow of funds into and out of the scheme and reconcile these against expected contributions and scheme costs.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
132	Keep records of transactions made to and from the scheme and any amount due to the scheme which has been written off.	Must	The Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014,	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury

133 & 134	Keep records of pension board meetings including any decisions made and also any decisions made outside of a meeting, including date, time and place of the decision and the names of the board members participating in the decision.	Must	The Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014,	<p>Action: Publish on the Surrey Fund website (when the local pension board has been appointed and in response to any meetings or decisions) (update the Communications Policy Statement).</p> <p>Responsible officer: The Senior Specialist Advisor</p>
135	Have in place adequate systems and processes to enable the retention of records for the necessary time periods.	Should	Not applicable	<p>Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund</i></p> <p>Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Senior Specialist Advisor, The Pension Services Manager</p>
136	Have policies and processes in place that monitor data on an ongoing basis to ensure it is accurate and complete, regardless if the volume of scheme transactions.	Should	Not applicable	<p>Through the <i>Pension Administration Strategy</i></p> <p>Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager</p>
137	Adopt a proportionate and risk-based approach to monitoring, based on any known or historical issues that may have occurred in relation to the scheme's administration.	Should	Not applicable	<p>Through the <i>Pension Administration Strategy</i></p> <p>Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager</p>

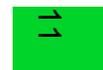




138	Continually review data and carry out a data review exercise at least annually.	Should	Not applicable	Through the <i>Pension Administration Strategy</i> Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager
141	Implement a data improvement plan if poor quality or missing data is identified.	Should	Not applicable	Through the <i>Pension Administration Strategy</i> Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager
142	Reconcile records with information held by scheme employers.	Should	Not applicable	Through the <i>Pension Administration Strategy</i> Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager
143	Ensure that processes are in place to manage scheme data in accordance with the Data Protection Act 1998.	Must	The Data Protection Act 1998	Through the <i>Pension Administration Strategy or Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund</i> Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager
144	Understand: <ul style="list-style-type: none"> • Obligations as data controllers; • The difference between personal data and sensitive personal data; • How data is held are how to 	Should	The Data Protection Act 1998	Through the <i>Pension Administration Strategy or Service level agreement between the pension investment/administration team</i>

	<ul style="list-style-type: none"> respond to data requests; The systems which need to be in place to store, move and destroy data How data protection affects member communication. 			<p>and Surrey County Council as the administering authority to the Surrey Pension Fund.</p> <p>Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager</p>
146	Demonstrate that records are kept in accordance with relevant legislative requirements.	Should	The Pensions Act 1995 and 2004, The Pensions Act 2008 and the Employers' Duties (Registration and Compliance) regulations 2010	<p>Through the <i>Pension Administration Strategy or Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund.</i></p> <p>Responsible officer(s): The Senior Specialist Advisor, The Pension Services Manager</p>

(b) Maintaining contributions				
tPR Code of practice 14 reference no:	Scheme manager requirement	Should/ Must	Overriding legislation	Scheme manager compliance and responsible officer
147	If employer contributions are not paid on or before the date they are due and this is likely to be of material significance to the regulator, give a written report on the matter to the regulator as soon as is reasonably practicable.	Must	The Pensions Act 2004	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register.</i></p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
149	If employee contributions are not paid by the scheme employer by the 19 th of the	Must	The Public Service Pension Act 2013	Through the Pension Fund Risk Management Process delivered





	month following the deduction from member pay (22 nd if paid electronically) and there is reasonable cause to believe that this failure is likely to be of material significance to the regulator, give notice of this failure to the regulator.			through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
149	If employee contributions are not paid by the scheme employer on an earlier date as laid out in the scheme regulations following the deduction from member pay, consider the statutory duty under section 70 of the Pensions Act 2004 to assess and if necessary report breaches of the law.	Should	The Pensions Act 2004	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
150	Ensure that there are adequate procedures and processes in place to identify payment failures.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
151	Monitor pension contributions, resolve payment issues and report payment failures.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
155	Develop a record for monitoring the payment of contributions to the scheme and prepare a contributions monitoring record in consultation with scheme employers. Included in this contribution	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> .

	<p>monitoring record:</p> <ul style="list-style-type: none"> • Contribution rates; • The date(s) on or before which employer contributions are to be paid to the scheme; • The date by when, or period within which, the employee contributions are to be paid to the scheme; • The rate or amount of interest payable where the payment of contributions is late. 			Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
158	Assess the timing of payments against the date specified in accordance with the scheme regulations.	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
161	Monitor contributions on an ongoing basis for all membership categories in the scheme.	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
162	Apply a risk-based and proportionate approach to help identify employers and situations which present a higher risk of payment failures occurring which are likely to be of a material significance and require intervention.	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>





163	Be aware if what is to be paid in accordance with the contributions monitoring record and identify when payments are late or over or under paid.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
165	Have adequate internal controls in place to monitor the sharing of payment information between the employer, pension scheme and member. Request payment information if it is not automatically available.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
166	Record and retain information on transactions, including employer and employee contributions received and payments of pensions and benefits.	Must	The Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
168	When notified of a problem or a problem is identified, assess whether a payment failure has occurred, taking in to account: <ul style="list-style-type: none">• Legitimate agreed payments made directly by an employer for scheme purposes;• Legitimate agreed payment arrangements made between an employee and employer;• Contributions paid directly to a pension provider, scheme	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury

	<p>administrator or investment manager;</p> <ul style="list-style-type: none"> Any AVCs included with an employer's overall payment. 			
169	<p>Follow a process including the following, if a payment failure is identified:</p> <ul style="list-style-type: none"> Investigate any apparent employer failure to pay contributions in accordance with the contributions monitoring record or legal requirements; Contact the employer promptly to alert them to the payment failure and seek to resolve the overdue payment; Discuss it further with the employer as soon as practicable to find out the cause and circumstances of payment failure; Ask the employer to resolve the payment failure and take steps to avoid a recurrence in the future. 	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
170	<p>Maintain a record of their investigation and communications between themselves and the employer.</p>	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p> <p>Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury</p>
171	<p>Review current processes or develop new processes which are able to detect situations where fraud may be more likely to occur and where additional checks may be appropriate.</p>	Should	Not applicable	<p>Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i>.</p>

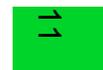




				Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
173	Report payment failures which are likely to be of material significance to the regulator within a reasonable period, in the case of employee contributions; and as soon as reasonably practicable in the case of employer contributions.	Must	The Pensions Act 1995, The Pensions Act 2004	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
174	Attempt to recover contributions within 90 days from the due date or prescribed period having passed without full payment of the contribution.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
175 - 177	Gain assurance from employers over: <ul style="list-style-type: none"> • The cause and circumstances of payment failures; • What action the employer has taken as a result of the payment failure, and • The wider implications or impact of the payment failure. And consider these points as part of the judgement process, when reaching a decision over whether there are reasonable grounds to report to the regulator.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register</i> . Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury, The Senior Specialist Advisor
181	Identify and report to the regulator any payment failures that may not be of material significance taken individually,	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk</i>

	but, which could indicate a systemic problem.			<i>Register.</i> Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
182	Consider whether it may be appropriate to report a payment failure of employer contributions to scheme members.	Should	Not applicable	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register.</i> Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
184	Report to the regulator within 10 working days and to members within 30 days of having reported to the regulator if it is judged that the payment failure is likely to be of material significance.	Must	The Pensions Act 1995, The Occupational Pension Schemes (Scheme Administration) Regulations 1996, The Pensions Act 2004	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register.</i> Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury
185	Report to the regulator made in writing	Must	The Pensions Act 2004	Through the Pension Fund Risk Management Process delivered through the <i>Pension Fund Risk Register.</i> Responsible officer: The Strategic Finance Manager – Pension Fund and Treasury

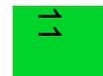
(c) Providing information to members				
tPR Code of practice 14 reference no:	Scheme manager requirement	Should/ Must	Overriding legislation	Scheme manager compliance and responsible officer





189	Provide first statement no later than 17 months after scheme regulations are established and then at least annually thereafter.	Must	The Public Service Pension Act 2013	Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund & the Key Performance Indicators</i> Responsible officer(s): The Pension Services Manager
190	Statements comply with HM Treasury directions	Must	The Public Service Pension Act 2013	Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund & the Key Performance Indicators</i> Responsible officer(s): The Pension Services Manager
191	Provide a benefit statement following a request by an active, deferred or pension credit members if one had not already been provided in the previous 12 months.	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund & the Key Performance Indicators</i> Responsible officer(s): The Pension Services Manager
192	Statements include information about of benefits by reference to a particular date and how they are calculated.	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the</i>

				<p><i>Surrey Pension Fund & the Key Performance Indicators</i></p> <p>Responsible officer(s): The Pension Services Manager</p>
193	Information given as soon as practicable and no more than two months after the date of the request is made.	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	<p>Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund & the Key Performance Indicators</i></p> <p>Responsible officer(s): The Pension Services Manager</p>
194	Provide a benefit statement to a (non excluded person) member of a DC scheme within 12 months of the end of the scheme year.	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	<p>Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund & the Key Performance Indicators</i></p> <p>Responsible officer(s): The Pension Services Manager</p>
195	<p>Provide the following information on the DC statement:</p> <ul style="list-style-type: none"> • Amount of contributions • Value of accrued rights • A statutory money purchase illustration 	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	<p>Through the <i>Service level agreement between the pension investment/administration team and Surrey County Council as the administering authority to the Surrey Pension Fund & the Key Performance Indicators</i></p> <p>Responsible officer(s): The Pension Services Manager</p>





196 & 197	Provide information in certain circumstances (for example, on request) along with confirmation that members may request further information and the postal and email address to which the person should send those requests and enquiries.	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	Through the <i>Communications Policy Statement</i> . Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager
198	Ensure that scheme members and others are given information in accordance with the Disclosure Regulations 2013.	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	Through the <i>Communications Policy Statement</i> . Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager
200	Disclose certain basic information about the scheme and benefits provided to prospective or new members.	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	Through the <i>Communications Policy Statement</i> . Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager
201	Provide information on request to a relevant person within two months of the request being made except where the same information was provided to the same person or trade union in the 12 months before the request.	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	Through the <i>Communications Policy Statement</i> . Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager
203	Take the following steps if information is being provided by electronic means: <ul style="list-style-type: none">• Provide scheme members and beneficiaries with the option to opt out of receiving information electronically by giving a written notice to the scheme;• Electronic communications is designed:<ul style="list-style-type: none">- so that the person will be able to access and rather store or print the	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	Through the <i>Communications Policy Statement</i> . Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager

	<p>relevant information and</p> <ul style="list-style-type: none"> - taking into account the requirements of disabled people. • Ensuring that members and beneficiaries who were members or beneficiaries on 1 December 2010 have been sent a written notice informing them: <ul style="list-style-type: none"> - it is proposed to provide information electronically in the future and - scheme members and beneficiaries may opt out of receiving information electronically by sending written notice. 			
204 & 205	<p>If information is being provided on the website for the first time or subsequently give notice (other than via a website) including:</p> <ul style="list-style-type: none"> • A statement advising that the information is available on the website, the website address, how and where it can be read. 	Must	The Occupational and Personal Pension Schemes (Disclosure of Information) regulations 2013	<p>Through the <i>Communications Policy Statement</i>.</p> <p>Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager</p>
207	Deliver communications to scheme members in a way that ensures they are able to engage with their pension provision.	Should	Not applicable	<p>Through the <i>Communications Policy Statement</i>.</p> <p>Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager</p>
208	Attempt to make contact with scheme members and where this is not possible carry out a tracing exercise.	Should	Not applicable	<p>Through the <i>Communications Policy Statement</i>.</p> <p>Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager</p>



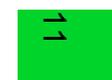


209	Acknowledge receipt if unable to provide an immediate answer to an information request.	Should	Not applicable	Through the <i>Communications Policy Statement</i> . Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager
210	Make information readily available.	Should	Not applicable	Through the <i>Communications Policy Statement</i> . Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager
211	Comply with other legislation requiring information to be provided to members of public service pension schemes.	Must	The Occupational and Personal Pension Schemes (Contracting-out) Regulations 1996, The Occupational and Personal Pension Schemes (Transfer Values) Regulations 1996, The Occupational and Personal Pension Schemes (Winding up etc.) Regulations 2005, The Occupational and Personal Pension Schemes (Internal Dispute Resolution Procedures Consequential and Miscellaneous Amendments) Regulations 2008,	Through the <i>Communications Policy Statement</i> . Responsible officer(s) The Senior Specialist Advisor, The Pension Services Manager

4. Resolving issues

- (a) Internal dispute resolution
- (b) Reporting breaches of the law

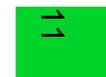
(a) Internal dispute resolution				
tPR Code of practice 14 reference no:	Scheme manager requirement	Should/ Must	Overriding legislation	Scheme manager compliance and responsible officer
213	Make and implement dispute resolution arrangements that comply with the requirements of the law and help resolve pensions disputes between the scheme manager and a person with an interest in the scheme.	Must	The Public Service Pension Act 2013	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
217	Specified persons take a decision required on matters in dispute within a reasonable period.	Must	The Pensions Act 1995	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
218	Dispute procedures state the manner in which an application for the resolution of a pension dispute is to be made, the particulars which must be included in such an application, the manner in which any decision in relation to such an application are to be reached and specify a reasonable period within the application must be made by certain people.	Must	The Pensions Act 1995	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
219	Provide information about the scheme's resolution procedure as well as	Must	Disclosure Regulations 2013, Occupational Pension	Through the <i>Internal Resolution Dispute Procedures</i>





	information about The Pensions Advisory Service and the Pensions Ombudsman.		Schemes (Internal Dispute Resolution Procedures) (Consequential and Miscellaneous Amendments) Regulations 2008	Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
223	Decide on the detail of the dispute resolution procedure.	Should	Not applicable	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
225	Publish and make specified time limits readily available to ensure that those with an interest in the scheme are aware that they must submit an application within a prescribed time.	Should	Not applicable	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
226	Ensure procedures specify a reasonable period within which applications by the following people must be made: <ul style="list-style-type: none"> • A person who has ceased to be a scheme member, widow, widower, surviving civil partner surviving dependent of a deceased member, surviving non-dependent beneficiary of a s deceased member and prospective scheme member. 	Must	The Pensions Act 1995	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
228	Decide the matter in dispute within a reasonable period of receiving the application.	Must	Not applicable	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager

				– Pension Fund and Treasury, The Pension Services Manager
230	Be satisfied that the time taken to reach a decision is appropriate to the situation as is able to demonstrate this if necessary.	Should	Not applicable	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
231	Notify applicants of the decision made within a reasonable time period.	Must	The Pensions Act 1995	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
231	Notify applicants of the decision no later than 15 working days after the decision has been made.	Should	Not applicable	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
232	Provide the applicant with regular updates on the progress of their investigation and, where the time period for a decision is expected to be shorter or longer than a reasonable time period, let them know when they are to receive an outcome.	Should	Not applicable	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
233	Focus on educating and raising awareness of the internal dispute resolution arrangements and ensuring they are implemented.	Should	Not applicable	Through the <i>Internal Resolution Dispute Procedures and the Communications Policy Statement</i>





				Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
234	Ensure that the effectiveness of arrangements are assessed regularly and be satisfied that those following the process are complying with the requirements, set which includes	Should	Not applicable	Ensure that internal controls are reviewed and remain compliant Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
235	Confirm and communicate dispute arrangements to members and make them accessible to potential applicants.	Should	Not applicable	Through the <i>Internal Resolution Dispute Procedures and the Communications Policy Statement</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
236	Provide information about the procedures and processes that scheme has in place for internal disputes to the following people in certain circumstances: <ul style="list-style-type: none"> • Prospective members; • Any scheme member who has not already been given the information; • Relevant people who request the information and who have not been given that information in the previous 12 months, and • Members or prospective members when schemes receive jobholder information, or when a jobholder becomes an active member, in 	Must	Disclosure Regulations 2013	Through the <i>Internal Resolution Dispute Procedures and the Communications Policy Statement</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager

	connection with automatic enrolment			
237	Provide the postal or email address and job title of the person to contact in order to make use of the internal dispute arrangements.	Must	Not applicable	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
238	Provide information about The Pension Advisory Service and the Pensions Ombudsman at certain stages.	Must	Occupational Pension Schemes (Internal Dispute Resolution Procedures) (Consequential and Miscellaneous Amendments) Regulations 2008	Through the <i>Internal Resolution Dispute Procedures</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
239	Ensure the following information is made available to applicants: <ul style="list-style-type: none"> • The procedure and processes to for a dispute to be resolved; • The information that an applicant must include; • The processes by which any decisions are reached, and • An acknowledgment once an application has been received. 	Should	Not applicable	Through the <i>Internal Resolution Dispute Procedures and the Communications Policy Statement</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager
240	When reviewing an application, ensure that they have all the information to make an informed decision, request further information if required and be satisfied that the time taken to reach a decision and notify the applicant are appropriate to the situation. Be able to demonstrate this to the regulator if required.	Should	Not applicable	Through the <i>Internal Resolution Dispute Procedures and the Communications Policy Statement</i> Responsible officer(s): The Strategic Finance Manager – Pension Fund and Treasury, The Pension Services Manager

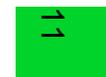




(b) Reporting breaches of the law

tPR Code of practice 14 reference no:	Scheme manager requirement	Should/ Must	Overriding legislation	Scheme manager compliance and responsible officer
244	Be satisfied that those responsible for reporting breaches are made aware of the legal requirements and tPR guidance.	Should	Not applicable	Through the <i>Local Pension Board Attendance and knowledge and understanding policy</i> and <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i> for Local Pension Board members and through the <i>CIPFA Knowledge and Skills Framework</i> and <i>Member's Code of Conduct</i> for Surrey Pension Fund Board Members. Responsible officer: The Senior Specialist Advisor
244	Provide training for scheme managers and pension board members.	Should	Not applicable	Through the <i>Local Pension Board Attendance and knowledge and understanding policy</i> and <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i> for Local Pension Board members and through the <i>CIPFA Knowledge and Skills Framework</i> and <i>Member's Code of Conduct</i> for Surrey Pension Fund Board Members. Responsible officer: The Senior Specialist Advisor

245	Have procedures enable people to raise concerns and facilitate the objective consideration of these matters.	Should	Not applicable	<p>Through the <i>Local Pension Board Attendance and knowledge and understanding policy</i> and <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i> for Local Pension Board members and through the <i>CIPFA Knowledge and Skills Framework</i> and <i>Member's Code of Conduct</i> for Surrey Pension Fund Board Members.</p> <p>Responsible officer: The Senior Specialist Advisor</p>
246	<p>Procedures include the following features:</p> <ul style="list-style-type: none"> • A process for obtaining clarification of the law around the suspected breach where needed; • A process for clarifying the facts around the suspected breach where they are not known; • A process for consideration of the material significance of the breach by taking into account its cause, effect, the reaction to it, and its wider implications, including (where appropriate) dialogue with the scheme manager or pension board; • A clear process for referral to the appropriate level of seniority at which decisions can be made on whether to report to the regulator; • An established procedure for 	Should	Not applicable	<p>Through the <i>Local Pension Board Attendance and knowledge and understanding policy</i> and <i>Local Pension Board Code of Conduct and Conflict of Interests Policy</i> for Local Pension Board members and through the <i>CIPFA Knowledge and Skills Framework</i> and <i>Member's Code of Conduct</i> for Surrey Pension Fund Board Members.</p> <p>Responsible officer: The Senior Specialist Advisor</p>



	<p>dealing with difficult cases;</p> <ul style="list-style-type: none">• A timeframe for the procedure to take place that is appropriate to the breach and allows the report to be made as soon as is reasonably practicable;• A system to record breaches even if they are not reported to the regulator (the record of past breaches may be relevant in deciding whether to report future breaches, for example it may reveal a systemic issue), and• A process for identifying promptly any breaches that are so serious they must always be reported.			
--	---	--	--	--