

Ref	Legal requirement	TPR's guidance	How Surrey Pension Fund complies with TPR guidance	Compliant	Action
<p>Governing the scheme</p> <p>Knowledge and understanding required by Pension board members</p> <p>[34 – 60]</p>	<p>A member of the pension board of a public service pension scheme must be conversant with:</p> <ul style="list-style-type: none"> • the rules of the scheme and • any document recording policy about the administration of the scheme which is for the time being adopted in relation to the scheme. <p>A member of a pension board must have knowledge and understanding of:</p> <ul style="list-style-type: none"> • the law relating to pensions, and • any other matters which are prescribed in regulations. <p>The degree of knowledge and understanding</p>	<p>1. Schemes should establish and maintain policies and arrangements for acquiring and retaining knowledge and understanding [38].</p>	<p>The Fund maintains a training policy reflecting the requirements for Knowledge and Understanding. The policy was approved by the Fund Committee in June 2020 and will be reviewed on an annual basis.</p> <p>Evidence: The Training policy for 2021-2 was also presented to the Local Pension Board in August, which was approved by the members.</p>	<p>Yes</p>	<p>Officers regularly update members on upcoming trainings.</p>

	required is that appropriate for the purposes of enabling the individual to properly exercise the functions of a member of the pension board.				
		2. Schemes should designate a person to take responsibility for ensuring that a framework is developed and implemented [38]	<p>The Pensions Finance Specialist is responsible for maintenance of training policy. However, it is Local Pension Board members' responsibility to establish and maintain their own personal knowledge and understanding.</p> <p>Evidence: Officers update members weekly on Pensions Administration and Investment issues.</p>	Yes	
		3. It is the responsibility of individual pension board members to ensure that they have the appropriate degree of knowledge and understanding to enable them to properly exercise their functions as a member of the pension board. [39]	<p>This is detailed in Terms of Reference and the induction pack provided to the board members.</p> <p>Evidence: Terms of reference are also uploaded and are always available on the fund website: https://www.surreypensionfund.org/media/1823/lpb-terms-of-reference-v2.pdf</p>	Yes	

		4. Schemes should prepare and keep an updated list of documents with which they consider pension board members need to be conversant [46]	All Board members are provided with Induction pack, annual report and accounts. Evidence: Pension Fund account and Annual report are presented to the board members annually and are also uploaded on the fund website. https://www.surreypensionfund.org/media/5917/annual-report-2020-21-final.pdf	Yes	
		5. Clear guidance on the roles and responsibilities and duties of boards and its members should be set out in scheme documentation. [47].	The Terms and References sets out the roles and responsibilities of the Board members and these are documented accordingly. Evidence: When a new member joins the board, they are provided with the Terms and Reference and are also uploaded the on the fund website: https://www.surreypensionfund.org/media/1823/lpb-terms-of-reference-v2.pdf	Yes	
		6. Schemes should assist pension board members to determine the degree of knowledge and understanding needed. [48].	Pension fund committee and Local Pensions Board members will be required to carry out Self-Assessment Questionnaire on an annual basis to assess their overall level of 'Knowledge and Understanding'.	Yes	In order to determine knowledge and understanding of board members, the fund has previously commissioned Hymans Robertson to conduct National Knowledge Assessment (NKA) to identify

			<p>Training on the identified areas will be provided as necessary, including induction and on an ongoing refresher basis.</p> <p>Also, all new members are provided with key documents as per Training Policy. Ongoing Board members will be required to attend further training with Pensions Committee in addition to carrying out additional ad-hoc training as other needs arise.</p>		<p>gaps in member knowledge to assist in devising an appropriate training plan.</p> <p>The NKA training plan is incorporated in Fund training policy.</p>
		<p>7. Scheme should provide board members with relevant training and support that they require. [55]</p>	<p>An updated training policy was approved by the Pension Fund Committee in March 2021. All members are encouraged to attend training events and a training log is maintained by officers.</p> <p>Evidence: In light of COVID-19 travel restrictions, board members continue to attend training virtually and these are recorded on a training log.</p>	Yes	
		<p>8. Schemes should offer pre-appointment training or arrange for mentoring by existing board members [56].</p>	<p>All new members are provided with induction pack and training is provided once they start.</p>	Yes	

		9. Pension board members should undertake a personal training needs analysis [57].	As highlighted in 6, Board members have recently completed Hymans National Knowledge Assessment (NKA), which identified training needs for members. The training plan was presented to the Local Pension Board in August 2021 meeting to approve.	Yes	
		10. Learning programs should be flexible, cover the type and degree of knowledge and understanding required and delivered within an appropriate timescale [58]	The training plan will be updated on annual basis and will take into account emerging issues e.g. new regulations. Evidence: A training plan is part of the training policy and was presented to the Local Pension Board in August 2021 to approve.	Yes	
		11. Pension board members completed the Pensions Regulator toolkit.	Local Pension Board members must complete induction training within the first three months of their appointment.	Partially	Encourage members to complete Pensions Regulator toolkit. Some of the Local Board members continue to complete The Pensions Regulator (tPR) toolkit.
		12. Schemes should keep appropriate records of the learning activities of board members [60].	Fund officers maintain a training log to record training attended by both members and officers. Evidence:	Yes	

			Officers continue to maintain a training log to record trainings attended by members.		
Conflicts of interest and representation [61 – 91]	<p>In relation to the pension board, scheme regulations must include provision requiring the scheme manager to be satisfied:</p> <ul style="list-style-type: none"> • that a person to be appointed as a member of the pension board does not have a conflict of interest: and • from time to time, that none of the members of the pension board has a conflict of interest. <p>Scheme regulations must require each member or proposed member of a pension board to provide the scheme manager with such information as</p>	13. Nolan ‘Seven principles of public life’ should be applied to all board members. Scheme should incorporate these principles into any codes of conduct (and across their policies and processes) and other internal standards for boards [70].	<p>The Governance statement covers the requirement for the seven principles of public life and these are applied to Pensions Committee members, Local Board members and all officers.</p> <p>Evidence: The Fund has a Code of Conduct & Conflict of Interest Policy in place which is regularly reviewed by officer and is uploaded on the fund website. https://mycouncil.surreycc.gov.uk/documents/s23724/Annex%20%20LPB%20Code%20of%20Conduct%20Policy.pdf</p>	Yes	

	<p>the scheme manager reasonably requires for the purposes of meeting the requirements referred to above.</p> <p>Scheme regulations must include provision requiring the pension board to include employer representatives and member representatives in equal numbers.</p>				
		14. Take professional legal advice when considering issues to do with conflict of interests [74].	When required complex conflict of interest issues would be referred for internal or if required external legal advice.	Yes	
		15. Schemes should ensure that there is an agreed and documented conflicts policy and procedure which should be kept under regular review [76].	Pension fund committee members, Local Board members and officers are required to follow Council Code of conduct.	Yes	

		16. Scheme should cultivate a culture of openness and transparency [78]	The chair of both Pension Fund committee and Local Pension Board encourage and ensure a culture of openness and transparency. Any potential conflicts are declared at the start of every meeting.	Yes	
		17. 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 [78].	Members from both committees are provided with a full report pack in advance of the meeting, which allows them to consider and disclose any relevant conflicts of interest.	Yes	
		18. Pension board members should be appointed under procedures that require them to disclose any interests or responsibilities which could become conflicts of interest [80].	A Declaration of Interest is completed by all members upon appointment and members are required to comply with the Council's Code of Conduct which requires registration of interests.	Yes	
		19. All terms of engagement should include a clause requiring disclosure of all interests and responsibilities which could become conflicts of	Members of the Pension Fund Committee and Local Board are required to disclose interests at the commencement of each meeting and these are recorded in the meeting minutes.	Yes	

		interest as soon as they arise [81].			
		20. Schemes should 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 [82].	<p>The annual Business Plan was considered and approved by the Pension Fund committee in March meeting. The Business Plan allows members to consider any potential or actual conflicts that may arise.</p> <p>Evidence: Business plan is presented annually to the Pension Fund Committee which lists the investment, funding, governance and delivery tasks scheduled to be carried out for the financial year, the target date when these should be achieved, and the responsible officer(s). This allows members to consider any potential conflict that may arise.</p>	Yes	
		21. Identify, evaluate and manage dual interests [83]	<p>Any conflicts of interest are declared at the commencement of each meeting and managed by the chair.</p> <p>The fund maintains a Register of Disclosable Interests on the website.</p>	Yes	Circulate register of interest on regular basis.

		22. Schemes should also capture decisions about how to manage potential conflicts of interest in their risk registers or Elsewhere. The register of interests and other relevant documents should be circulated to the pension board for ongoing review and published, [84]			
		23. Conflicts of interest should be included as an opening agenda item at board meetings and revisited during the meeting where necessary [85].	“Disclosures of Interest” is a standing item at the commencement of each meeting for both board members. Any disclosures are recorded in the minutes of the meeting.	Yes	
		24. Establish and operate procedures which ensure that boards are not compromised by potentially conflicted members [86].	At the commencement of the meetings the agenda progresses through standing items of noting the Terms of reference and an invitation to disclose any interests.	Yes	
		25. Be open and transparent about the way they manage potential conflicts of interest [87].	This is covered in the Council code of Conduct	Yes	

		26. Consider seeking professional legal advice when assessing any option when seeking to manage a potential conflict of interest [88].	When required complex conflict of interest issues are referred for internal and if necessary external legal advice is considered.	Yes	
		27. Membership of boards should be designed with regard to proportionality, fairness and transparency and with the aim of ensuring that the board has the right balance of skills, experience and representation [91].	The board membership includes suitable representation on from employers and scheme members and includes an elected councillor to provide for fairness and proportionality.	Yes	
Publishing information about schemes [92 – 99]	<p>The scheme manager for a public service scheme must publish information about the pension board for the scheme(s) and keep that information up to-date.</p> <p>The information must include:</p> <ul style="list-style-type: none"> • who the members of the pension board are • representation on the board of members of the scheme(s), and 	28. Scheme managers must publish the information required about the pension board and keep that information up to date. [95]	<p>The Fund website provides information relating to the Local Pension Board.</p> <p>Evidence: The Board papers and members profile is regularly updated on the fund website. https://www.surreypensionfund.org/surrey-pension-fund/about-us/local-pension-board/</p>	Yes	

	<ul style="list-style-type: none"> the matters falling within the pension board's responsibility. 				
		<p>29. Schemes should also publish up-to-date relevant information about the pension board such as set out in 96 and 97.</p>	<p>The information is published on Fund website and includes:</p> <ul style="list-style-type: none"> Board Membership Terms of reference <p>Evidence: The documents are published on the website. https://www.surreypensionfund.org/media/1823/lpb-terms-of-reference-v2.pdf</p>	Yes	
		<p>30. Have policies and processes to monitor all published data on an ongoing basis to ensure it is accurate and complete [98].</p>	<p>Changes to the membership are reflected on the fund website. Information relating to the Pension fund committee and Local Pension Board is published on the council's website.</p> <p>Evidence: Changes in the Board membership are regularly updated on the Fund website. https://www.surreypensionfund.org/surrey-pension-fund/about-us/local-pension-board/</p>	Yes	

			The Pension Fund website is also updated on monthly basis by the fund actuary.		
Managing Risks Internal Controls [101 – 120]	The scheme manager of a public service pension scheme must establish and operate internal controls. These must be 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.	31. Internal controls should include a clear separation of duties, processes for escalation and decision making and documented procedures for assessing and managing risks, reviewing breaches of law and managing contributions to the scheme [103].	There are substantial internal controls in place including a number of ongoing monitoring areas that are reported to the Pension Fund Committee and Local Pension Board. Breaches of law are reported to the Pension Fund committee and Local Pension Board. Contributions are monitored by officers on regular basis. Evidence: The risk registers are updated regularly and presented to the Local Pension Board and Pension Fund Committee with revised weighting highlighted on the updated risk register.	Yes	
Identifying risks		32. Scheme's internal controls should address significant risks which are likely to have a material impact on the scheme. Scheme managers should employ a risk-	The fund maintains a risk register which is reviewed regularly (at least every quarter). Each risk is scored for its potential impact and likelihood. The mitigation of the risk is also considered within the risk register.	Yes	

		<p>based approach and ensure that sufficient time and attention is spent on identifying, evaluating and managing risks and developing and monitoring appropriate controls. [105]</p> <p>33. Schemes should carry out a risk assessment [106].</p> <p>34. Schemes should record risks in a risk register and review it regularly. Schemes should keep appropriate records to demonstrate compliance with legal requirements [108].</p>	<p>The Risk Register is reported to the Local Pension Board. In addition, the Pensions Committee receives a quarterly summary report.</p> <p>The Fund also has a Covid-19 risk register, which is regularly reviewed and sent to Local Board and Pension Committee.</p>		
<p>Evaluate risks and develop internal controls</p>		<p>35. Prioritise risks where the impact and likelihood of the risk materialising is high [109].</p> <p>36. Review any existing internal controls [110].</p> <p>37. Design internal controls to mitigate main risks and consider how best to monitor them [111].</p>	<p>Outlined within the risk register of the fund.</p>	<p>Yes</p>	

Monitor controls effectively		38. Schemes should periodically review the adequacy of internal controls [115].	The risk register is presented to the Local Pension Board on quarterly basis and a report is presented to the Pension Fund Committee to approve changes or additions in the risk register.	Yes	
		39. Internal or external audits and/or quality assurance processes should ensure that adequate internal controls are in place and being operated effectively. 40. Review internal controls when substantial changes take place or where a control has been found to be inadequate [116].	Internal audit is undertaking a follow up review from 2019/20 to review controls and systems. External Audit review internal controls of systems as part of the annual review of the Fund's annual financial statements. If controls are found to be inadequate. Officers develop action plan to address areas in a timely manner.	Ongoing	Regular updates on internal audit are provided to the Local Board in the Pension's Administration report with previous update provided in August 2021. The external audit is currently being carried out by Grant Thornton for 2020/21 accounts.
Suggested internal controls		41. Internal controls that ensure that new employers understand what member data is required and how it should be supplied.	Internal controls are subject to regular to internal and external audit. New employers are provided with an admission agreement which sets out their obligation to the scheme.	Yes	

		<p>Internal controls that require internal or external auditors to audit any automated systems.</p> <p>Internal controls to ensure that systems support the maintenance and retention of good member records.</p> <p>Internal controls that ensure that data are complete (e.g. undertake a data-cleansing or member tracing exercise and review this on a regular basis (at least annually or at regular intervals that they consider appropriate)).</p> <p>Ensure that all staff completes information management training before they are given access to sensitive data.</p> <p>Ensure that member communications are reviewed Regularly.</p>	<p>Information is shared with employers through secure network.</p> <p>The Fund carried out covenant review to evaluate employer strength as part of 2019 Valuation.</p>		
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		Schemes should put in place systems and processes for making an objective assessment of the strength of an employer's covenant [112].			
<p>Administration</p> <p>Scheme recordkeeping</p> <p>[122 – 146]</p>	<p>Scheme managers must keep records of information relating to:</p> <ul style="list-style-type: none"> • member information • transactions and • pension board meetings and decisions <p>Legal requirements for this are set out in the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014.</p> <p>Schemes must ensure that processes that are created to manage</p>	<p>42. Schemes should be able to demonstrate to the regulator, where required, that they keep accurate, up-to-date and enduring records [124].</p>	<p>An updated Administration Strategy was presented to the Local Pension Board in October 2019 and has been approved by the Pension Fund committee. The strategy became effective from 1 April 2020.</p> <p>Evidence: The administration strategy regulates performance and data retention. The Fund reviews data quality and monitors scores regularly.</p>	Yes	The Administration strategy is regularly reviewed by the fund officers.

	scheme member data meet the requirements of the Data Protection Act 1998 and the data protection principles.				
		43. Schemes should establish and operate adequate internal controls to support record-keeping requirements [125].	The internal controls are monitored in the Risk Register and the internal auditors regularly review the internal controls.	Yes	
		44. Member data should be subject to regular data evaluation [126]. 45. Schemes must be able to provide members with accurate information regarding their pension benefits and pay right benefits to right person at right time [127]	The Fund is currently working on the Data improvement plan to address areas where the quality of data can be enhanced. A webpage facility is available to allow members to access individual pension's information. This allows members to access their data and verify that service and pensionable pay and hours have been correctly recorded.	Yes	
		46. Schemes should require employers to provide them with timely and accurate data and ensure that appropriate procedures and timescales are in place to do this. [128 and 130].	The Fund will present the Communication Policy to the Local Pension Board to approve. The Communication Plan sets out the communication methods with different stakeholders in the Fund.	Yes	Officers liaise with employers on regular basis for outstanding data.

		<p>47. Schemes should seek to ensure that employers understand the main events which require information to be passed to the scheme [129].</p>	<p>The Administration Strategy outlines the procedures and deadlines for employers' submission of data to the fund. For Annual Benefit Statements (ABS) exercise, the Fund regularly contacts employers to remind them of statutory deadlines to submit their data.</p> <p>At the beginning of the financial year all employers are provided with an updated contribution form, providing guidance and required timescales. The form allows employers to validate if they are paying the right contributions.</p> <p>The Fund sends annual newsletters to employers to update them on regulatory changes and remind them of their responsibilities.</p> <p>The Fund also organises Annual General Meeting (AGM) to update employers on key events from the year.</p>		
		<p>48. Schemes should be able to trace the flow of funds into and out of the scheme and reconcile these against expected contributions and scheme costs [131].</p>	<p>Employers advise the Fund of pension contributions due, this is checked by the Fund to ensure the employer contribution rate reconciles to the actuarial certificate and the total contributions due are</p>	Yes	<p>The Fund has published its Privacy Notice: data is retained for so long as it is needed in order to fulfil the requirements of the pension scheme legislation.</p>

		49. Scheme managers must keep records of transactions made to and from the scheme and any amount due to the scheme which has been written off [132]	relatively consistent with previous months. The fund monitors the funds made and received.		https://www.surreypensionfund.org/media/3919/privacy-notice.pdf
		50. Records should be kept regarding meetings of and decisions by pension boards as well as records of key discussions [133].	Records of agendas and minutes of Pension Fund Committee and Local Pension Board are posted on Surrey County Council Website.	Yes	
		51. Schemes must also record any decisions taken by members of the pension board [134]	No decisions are made by LPB outside normal meetings.	Yes	
		52. Records should be retained for as long as they are needed [135].	Most records are stored electronically. The fund is currently in process of scanning paper copies onto an electronic system.	Yes	The Fund has published its Privacy Notice: data is retained for so long as it is needed in order to fulfil the requirements of the pension scheme legislation. https://www.surreypensionfund.org/media/3919/privacy-notice.pdf

		<p>53. Schemes should monitor data (based on a proportionate and risk-based approach) on an ongoing basis to ensure it is accurate and complete [136,137].</p> <p>54. Schemes should carry out a data review exercise at least annually. Schemes should continually review their data [138].</p>	<p>Pension fund is working with the Admin team to enhance the quality of data to ensure it is accurate and complete.</p> <p>However, checks are carried out to validate the data which include:</p> <ul style="list-style-type: none"> • Triennial valuation exercise • Records amended on a 3 yearly basis if any issues are identified by actuaries doing their data cleaning. 	Yes	<p>The Pension Administration Team routinely check the integrity of member records as part of BAU processing and raise queries for any potential errors.</p> <p>Annually the PAT load, validate and resolve queries relating to completeness and accuracy as part of Employer year end returns.</p> <p>Significant data cleanse work was carried out as part of the 2019 Valuation.</p> <p>October 2019 saw the start of an address tracing exercise for deferred members who have “gone away”.</p>
		<p>55. Schemes should put in place a data improvement plan where poor quality or missing data is identified [141].</p>	<p>Pension service is currently in process of arranging a meeting with members to discuss improvement plan.</p>	Yes	<p>tPR Common and Scheme Specific data quality reports are produced annually to monitor data quality and inform priority areas for improvement. The Fund has produced an initial data improvement plan that addresses the issues identified in these reports and work to correct these issues will commence in the autumn.</p>

		<p>56. Schemes should reconcile member records with information held by the employer [142].</p>	<p>End of year return forms are sent to employers to complete to reconcile records.</p>	<p>Yes</p>	<p>Significant effort is put into employer engagement and follow up in order to receive end of year information in a timely and accurate way.</p> <p>It is the employer responsibility for prompt notification of membership changes to the Fund.</p>
		<p>57. Schemes must ensure that member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles. [143]</p> <p>58. Schemes should understand:</p> <ul style="list-style-type: none"> - the obligations of data controllers - the difference between personal data and sensitive personal data - how data is held and how responses to data requests from different parties are handled - the systems required to store, move and destroy data [144] 	<p>Egress and GSX are used for sending data to/from employers which is fully secure. Focal point is used for secure transfer of data to/from actuaries.</p>	<p>Yes</p>	

<p>Maintaining contributions</p> <p>[147 – 186]</p>	<p>Employer contributions must be paid to the scheme in accordance with any requirements in the scheme regulations. Where employer contributions are not paid on or before the date they are due under the scheme and the scheme manager has reasonable cause to believe that the failure is likely to be of material significance to the regulator in the exercise of any of its functions, the scheme manager must give a written report of the matter to the regulator as soon as reasonably practicable.</p> <p>Where employee contributions are not paid within the prescribed period, if the scheme manager has reasonable cause to believe that the</p>	<p>59. Scheme managers should have effective procedures and processes in place to identify payment failures that are – and are not – of material significance to the regulator [150 and 151].</p>	<p>Officers monitor the contribution received and carry out reconciliation on regular basis. All legal breaches are reported to the Pension Fund Committee and Local Pension Board with any significantly material breaches reported to the Pension Regulator.</p>	<p>Yes</p>	
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	<p>failure is likely to be of material significance to the regulator in the exercise of any of its functions, they must give notice of the failure to the regulator and the member within a reasonable period after the end of the prescribed period. Where there is a failure to pay employee contributions on an earlier date in accordance with scheme regulations, schemes should also consider their statutory duty under section 70 of the Pensions Act 2004 to assess and if necessary report breaches of the law.</p>				
		<p>60. Such procedures are likely to involve: a) Developing a record to monitor the payment of contributions.</p>	<p>The contribution spreadsheet automatically flags up if employers are paying the right contribution.</p>	<p>Yes</p>	<p>The fund officers carry out reconciliation on quarterly basis to ensure employers are paying at the correct rate.</p>

		<p>b) Monitoring the payment of contributions.</p> <p>c) Managing overdue contributions.</p> <p>d) Reporting payment failures which are likely to be of material significance to the regulator [152].</p>			
		<p>61. Schemes should have a contribution monitoring record to check contributions have been paid in full and in a timely manner [155 to 157].</p>	<p>Employers submit monthly contribution form; the form automatically flags up if the employer is paying at correct contribution rate.</p> <p>Evidence: The Fund regularly reviews the contribution received from employers and any delays are picked up in a timely manner.</p>	Yes	
		<p>62. Schemes should monitor contributions on an on-going basis [161].</p> <p>63. A risk based and proportionate monitoring approach should be used to identify employers and</p>	<p>All contributions are recorded and maintained monthly.</p> <p>Officers undertake quarterly reconciliation to check for any late, overpaid, underpaid or non-payment of contributions.</p>	Yes	

		<p>situations which present a higher risk of payment failure [162].</p> <p>64. Schemes should have a process in place to identify where payments are late or have been underpaid, overpaid or not paid at all [163].</p> <p>65. Schemes to effectively monitor contributions they will require access to certain information [164]</p> <p>66. Schemes should have adequate internal controls in place to monitor the sharing of payment information between the employer, pension scheme and member.</p> <p>Scheme managers must record and retain information on transactions [165]</p> <p>67. Scheme managers must record and retain</p>			
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		information on transactions (including any employer and employee contributions) [166].			
Managing overdue contributions		68. Where a payment failure is identified, there should be a process to follow to resolve the issue quickly (including the suggested steps set out in the Code) [169].	When an employer persistently fails to make payments, an email is sent to the employer to request outstanding payments.	Yes	
		69. Schemes should have a process which is able to detect deliberate underpayment or non-payment or other fraudulent behaviour by an employer [171].	Officers carry out quarterly reconciliation to monitor payments. Where variances are material, this is followed up with the relevant employer to clarify and understand why contributions levels have changed.	Yes	
Reporting payment failures which are likely to be of material significance to the regulator		70. Where schemes identify a payment failure, they should attempt to recover contributions within 90 days of their due date [174]. 71. Where a payment failure is identified it should at least ask the employer the 3 questions set out in 175.	Contacts are made with the employers in order to attempt to obtain outstanding payment. In the event of non-payment the Fund will investigate it and also seek information from other sources whilst remaining compliant with GDPR.	Yes	

		<p>72. Schemes should consider these points together and establish whether they have reasonable cause to report. [176]</p> <p>Schemes should investigate the payment failure and use their judgement when deciding whether to report to the regulator taking into account the wording of the Code [176].</p> <p>73. Schemes should investigate the payment failure and use their judgement when deciding whether to report to the regulator [177]</p> <p>74. Schemes may choose to take an employer's response to their enquiries at face value [178]</p> <p>75. Schemes should identify and report to the regulator, as</p>			
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		<p>appropriate, any payment failures that may not be of material significance taken individually, but which could indicate a systemic problem [179]</p> <p>76. Schemes should consider whether it is appropriate to report payment failures of employer contributions to members where it is reported to the regulator. [182].</p>			
<p>Administration</p> <p>Providing information to members [187 – 211]</p>	<p>The law requires schemes to disclose information about benefits and scheme administration to scheme members and others. The Code summarises the legal requirements around:</p> <p>(1) Benefit statements, provided annually for active members [188 – 195]</p>	<p>77. Managers of a scheme must ensure that scheme managers and others are given information in accordance with the Disclosure Regulations 2013, unless they are an ‘excluded person’. [198]</p>	<p>The Fund aims to provide an annual benefit statement to active and deferred members by 31 August each year.</p>	<p>Yes</p>	<p>Ensure all Annual Benefit Statements are provided on time.</p> <p>ABS to active and deferred members generated and distributed on the basis agreed with Fund Officers.</p> <p>The Fund approves and publishes an Administration Strategy which sets out the scheme employers’ duties to provide information to scheme members.</p>

	<p>(2) Other information about scheme administration [196–197].</p> <p>(3) Who is entitled to information [198 – 199]</p> <p>(4) When basic scheme information must be provided [200 – 201]</p> <p>(5) What information must be disclosed on request [202]</p> <p>(6) How benefit statements and other information must be provided [203 – 206]</p> <p>Scheme should also comply as appropriate with other legal disclosure requirements [211].</p>				<p>https://www.surreypensionfund.org/media/1812/pension-administration-strategy-policy.pdf</p>
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		78. Schemes should design and deliver communications to scheme members in a way that ensures they are able to engage with their pension. Information should be clear and simple to understand as well as being accurate and easily accessible [207].	All information is delivered in a simple and clear manner avoiding pension jargon. The fund uses Local Government Association communication materials and provides link to their website and guidance.	Yes	
		79. Schemes should attempt to contact their members and, where contact is not possible, schemes should carry out a tracing exercise to locate the member and ensure that their member data are up-to-date [208].	The Fund is scheduled to commission its next tracing exercise to locate missing deferred scheme members.	Yes	The tracing agency, ITM carried out a trace on 10,582 deferred 'gone away' members and were able to identify addresses for 7,088 of these members (a success rate of 66.98%). Going forward, the Fund will undertake this exercise annually.
		80. Where a person has made a request for information, schemes should acknowledge receipt if they are unable to provide the information at that stage [209].	Receipt of emails to the pensions helpdesk is confirmed automatically.	Yes	

<p>Resolving Issues</p> <p>Internal dispute Resolution</p> <p>[212 – 240]</p>	<p>Scheme managers must 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.</p>	<p>81. Scheme managers must 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. [213]</p>	<p>There is a formal two stage process, known as the internal disputes resolution procedure (IDRP) in place. Each case is logged and acknowledged by a fund officer and passed to an adjudicator for determination. After both stages are complete, the appellant is informed about the Pensions Advisory Service and possibility of taking the case to Pensions Ombudsman.</p>	<p>Yes</p>	
		<p>82. Schemes may decide to specify time limits within which a member must apply for a dispute to be resolved and should publish and make these IDRP time limits readily available [225].</p> <p>83. Schemes should be satisfied that the time taken to reach a decision is appropriate to the situation and be able to demonstrate this, if necessary. [230 and 240]</p>	<p>Details of the Internal Dispute Resolution Procedure (IDRP) are published on the fund website and contains full guide.</p> <p>https://www.surreypensionfund.org/media/4550/idrp-guide-april-2019v1.pdf</p> <p>Procedures for employers are contained within the employer guide on the website.</p>	<p>Yes</p>	

		<p>84. Schemes should provide the applicant with regular updates on the progress of their investigation. They should notify the applicant where the time period for a decision is expected to be shorter or longer than the reasonable time period and let them know when they are likely to receive an outcome [232].</p> <p>85. Schemes should focus on educating and raising awareness of their internal dispute resolution arrangements and ensuring that they are implemented [233].</p>	<p>The timescales are set out in the IDRPs documents. All communications with members alert them to their right of appeal.</p> <p>The timescales are determined by the Local Government Pension Scheme Regulations 2013.</p>	Yes	
		<p>86. Schemes should make their arrangements accessible to potential applicants, for example by publishing them on a scheme website [235].</p>	<p>Details of the IDRPs are published on the Fund website.</p> <p>https://www.surreypensionfund.org/media/4550/idrp-guide-april-2019v1.pdf</p>	Yes	

		<p>87. Schemes should ensure they make the following information available to applicants:</p> <ol style="list-style-type: none"> I. The procedure and processes to apply for a dispute to be resolved, II. The information that an applicant must include, III. The process by which any decisions are reached; and IV. An acknowledgement once an application has been received [239]. 	<p>Details of the IDRPs are published on the Fund website. A log of all appeal cases is kept detailing dates when cases are received, acknowledged and determined.</p>	Yes	
<p>Reporting breaches of the law [241 – 275]</p>	<p>Certain people are required to report breaches of the law to the regulator where they have reasonable cause to believe that:</p> <ul style="list-style-type: none"> • a legal duty which is relevant to the administration of the scheme has not been, 	<p>88. People who are subject to the reporting requirement are set out in [242].</p>	<p>Those responsible for reporting breaches to the Pensions Regulator include:</p> <ul style="list-style-type: none"> • Members of the Pension Fund Committee • Members of the Local Pension Board • Officers of the Fund • Scheme Employers 	Yes	

	<p>or is not being, complied with</p> <ul style="list-style-type: none"> the failure to comply is likely to be of material significance to the regulator in the exercise of any of its functions. 				
		<p>89. Schemes should be satisfied that those who are responsible for reporting breaches are made aware of the legal requirement and the Code</p> <p>90. Training should be provided for scheme managers and pension board members [244].</p> <p>91. Those with a statutory duty to report should establish and operate appropriate and effective procedures in regard to reporting breaches [245].</p>	<p>The fund has a policy and procedure in place for Reporting Breaches of the Law to the Pensions Regulator.</p>	<p>Yes</p>	

		92. Those procedures should be in accordance with and take into account paragraphs 245 to 262 of the Code.	The policy on reporting breaches is compliant with the Pensions Regulator Code of Practice.	Yes	
		93. Reports made to the Regulator should be submitted in accordance with paragraphs 263 to 271.	A register is maintained that records all breaches within the Fund.	Yes	