



# SURREY LOCAL PENSION BOARD REPORT

---

**SURREY COUNTY COUNCIL**

**SURREY LOCAL PENSION BOARD**

**DATE: 15 NOVEMBER 2024**

**LEAD OFFICER: NEIL MASON, LGPS SENIOR OFFICER**

**SUBJECT: THE PENSIONS REGULATOR GENERAL CODE OF PRACTICE**

## **SUMMARY OF ISSUE:**

This report provides the Local Pension Board (the Board) with an update on the status of compliance with The Pensions Regulator's (tPR) General Code of Practice.

## **RECOMMENDATIONS:**

It is recommended that the Local Pension Board:

1. Note the update on compliance with TPR's General Code of Practice and actions identified.
2. Make any recommendations to the Pension Fund Committee if required.

## **REASON FOR RECOMMENDATIONS:**

1. This report provides details of the self-assessment which has been undertaken by officers with support and challenge from the Fund actuary, Hymans Roberston. The Board is asked to review and comment on this report.

## **DETAILS:**

2. As previously reported on 16 February 2024 and as anticipated, the regulator's General Code of Practice (the Code) brings together the original 10 codes of practice, including Code of Practice 14 (Governance and Administration of Public Service Pension Schemes) as was applicable to the Local Government Pension Scheme (LGPS), into a single modular code that applies to all UK pension schemes.
3. The Code has five overarching principles covering the governing body; funding and investment; administration; communications and disclosure; and reporting to TPR, each of which is divided up into a total of 51 modules. It should be noted that not all aspects of the Code apply to the LGPS, however some features are considered good practice.
4. The Fund's actuary (Hymans Robertson) has provided a "checker tool" against which officers have assessed the existing level of compliance to the

Code and the report at Annexe 1 provides a position statement & self-assessment results.

5. Alongside the five main areas containing 51 modules, the Code also prioritises each area as: regulatory requirement, TPR expectations, and best practice. The approach taken for this initial assessment has been to work through the Code chapter by chapter prioritising the regulatory requirements. As such, 11 of the 14 chapters (applicable to the LGPS), have been self-assessed and ranked accordingly as fully, partially or not compliant.
6. The three chapters yet to be completed are: IT & Cyber: this has been partially assessed but requires input from the Surrey County Council's IT service; Funding & Investment and Advisors and Service Providers, both of which contain best practice requirements only and therefore have been considered lower priority at this stage.
7. The results of the self-assessment indicate that (of the 11 chapters reviewed) for 5 there is full compliance and partial compliance in the other 6, where most follow up action is required in the modules of Administration (scheme administration) and The Governing Body (risk management).
8. The graphs in the Assessment Summary section of Annexe1 indicate strong compliance against the regulatory requirements and reasonable compliance against TPR expectations.
9. Section 4 of Annexe 1 details the next steps which will include: complete the assessment of the remaining three chapters and identifying the steps required to turn partially compliant areas to fully compliant. It is also worth considering whether, once the self-assessment has been completed in full, to undertake an independent review of the Fund's compliance against the Code.

#### **CONSULTATION:**

10. The Chair of the Local Pension Board has been consulted on this report.

#### **RISK MANAGEMENT AND IMPLICATIONS:**

11. Any relevant risk related implications have been considered and are contained within the report.

#### **FINANCIAL AND VALUE FOR MONEY IMPLICATIONS:**

12. Any relevant financial and value for money implications have been considered and are contained within the report. The cost of the resources necessary for implementing the changes recommended above and for delivering the administering authority role is met from the pension fund (under Regulation 4(5) of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009).

### **LEGAL IMPLICATIONS – MONITORING OFFICER:**

13. There are no legal implications or legislative requirements.

### **EQUALITIES AND DIVERSITY:**

14. There are no equality or diversity issues.

### **OTHER IMPLICATIONS:**

15. There are no other implications.

### **NEXT STEPS:**

16. The following next steps are planned:

- a) Complete the assessment of the remaining three chapters and identifying the steps required to turn partially compliant areas to fully compliant.
- b) Further updates on progress towards full compliance will be reported to the Board at its next meeting on 21 February 2025.

---

### **Contact Officer:**

Colette Hollands, Head of Accounting and Governance

### **Annexes:**

1. GCOP – Position Statement and Assessment Summary – Annexe 1

### **Sources/Background papers:**

1. The Pensions Regulator – [General Code of Practice](#)

This page is intentionally left blank