



TPR General code of practice

North Yorkshire Pension Fund (NYPF) - Scheme Assessment

Prepared for: North Yorkshire Council
NYPF Pension Committee
NYPF Pension Board

Prepared by: Aon
Date: 29 October 2024

Introduction






TPR Code Compliance model

This report sets out how North Yorkshire Pension Fund (NYPF) complies with the Pension Regulator's (TPR) General code of practice (the Code) in relation to the management of the North Yorkshire Pension Fund (NYPF) which is part of the Local Government Pension Scheme (LGPS).

Note that the Code applies to governing bodies of all occupational, personal and Public Service Pension Schemes and therefore it is generic in nature. This document highlights all the key elements of the Code relevant to Public Service Pension Schemes and sets out whether North Yorkshire Council is compliant in each of the Code's modules. There may be a number of requirements relating to these elements that are specifically stipulated within LGPS legislation and it is not the purpose of this compliance model to consider that level of detail.

Key

	Compliant
	Compliant in some but not all areas
	Not currently compliant
PC	Pension Committee (or equivalent)
PB	Local Pension Board
TPR	The Pensions Regulator
LGPS	Local Government Pension Scheme
Code	TPR's General code of practice



The governing body

The governing body – at a glance



Board Structure and activities

Fully compliant in 3 out of 5 modules



4 questions are red and 2 questions are amber out of 30 questions.

Knowledge and understanding requirements

Fully compliant in 1 out of 2 modules



No questions are red and 2 questions are amber out of 20 questions.

Advisers and service providers

Fully compliant in 0 out of 1 module



No questions are red and 1 question is amber out of 19 questions.

Risk Management

Fully compliant in 3 out of 6 modules



3 questions are red and 3 questions are amber out of 50 questions. 1 question is unanswered.

Scheme governance

Fully compliant in 0 out of 1 module



2 questions are red and 8 questions are amber out of 24 questions.

Essential actions

- Expected behaviours & standards to be included in future induction training
To be included in training policy/strategy document
Training policy currently being updated
- Not in the constitution, possibly governance policy para in to cover. Democratic services discussion.
- Role of chair process not detailed enough, revisit whole section, speak to Democratic Services
- Role of chair process not detailed enough, revisit whole section, speak to Democratic Services
- Chair skills and behaviours, speak Democratic Services
- Additional question in skills gap analysis
What was given to new PFC chair?
Not technical skills but softer Chair training
- To review outcome of Hymans knowledge assessment and develop plan from that
- To review outcome of Hymans knowledge assessment and develop plan from that

Comments

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

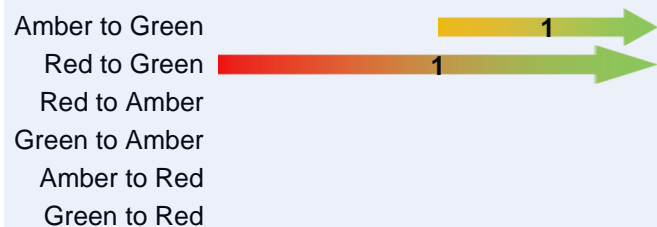
The governing body - changes



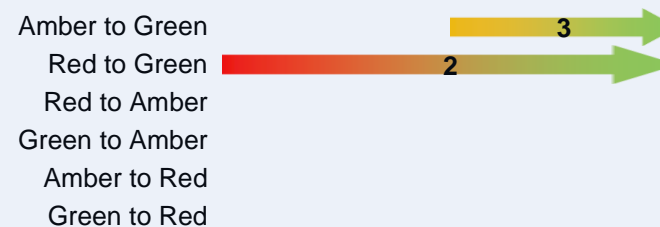
Changes since previous report (if relevant)

The charts below shows how many responses to the questions have changed Red, Amber, Green (RAG) status within each sub-section. If you click within the blue boxes it will take you to the relevant modules (which also records the previous answer and previous score).

Board structure and activities



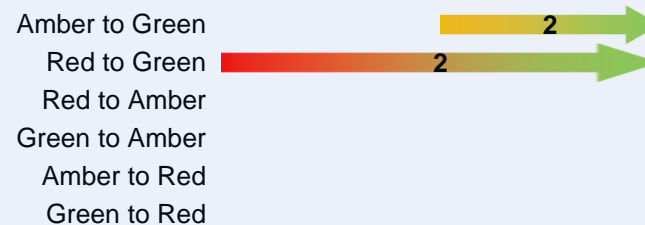
Knowledge and understanding requirements



Advisers and service providers



Risk management



Scheme governance

Amber to Green
Red to Green
Red to Amber
Green to Amber
Amber to Red
Green to Red



The governing body

Modules

Board structure and activities

- Role of the governing body (1)
- Recruiting and appointment to the governing body (2,6)
- *Arrangements for member-nominated trustee appointments (7)*
- Appointment and role of the chair (5)
- Meetings and decision-making (1)
- Remuneration and fee policy (4)

Knowledge & understanding requirements

- Knowledge and understanding (3,6)
- Governance of knowledge and understanding (3,6)

Value for scheme members (DC only)

- *Value for members (7)*

Notes:

The numbers next to the module names above set out Aon's interpretation of the Code for Public Service Pension Schemes. Please note it should not be taken as legal advice.

- (1) Applies
- (2) Mostly applies
- (3) Partially applies
- (4) Good practice
- (5) Mostly good practice
- (6) Partially good practice
- (7) Does not apply

Advisers and service providers

- Managing advisors and service providers (4)

Risk management

- Identifying, evaluating and recording risks (1)
- Internal controls (1)
- Assurance reports on internal controls (1)
- Scheme continuity planning (4)
- Conflicts of interest (3,6)
- Own risk assessment (4)
- *Risk management function (7)*

Scheme governance

- Systems of governance (4)





Funding and investment

Funding and investment – at a glance



Investment

Fully compliant in 4 out of 4 modules



No questions are red and no questions are amber out of 37 questions.

Essential actions

- RI policy - check it covers operational risk

Comments

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Funding and investment - changes



Changes since previous report (if relevant)

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Investment

Amber to Green
Red to Green
Red to Amber
Green to Amber
Amber to Red
Green to Red



Funding and investment



Modules

Investment

- Investment governance (4)
- *Investment decision making* (7)
- Investment monitoring (4)
- Stewardship (6)
- Climate change (3,6)
- *Statement of investment principles* (6)*
- *Default arrangements and charge restrictions* (7)

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* Note that for the Statement of investment principles module the Code references good practice for PSPSs. However, due to the overriding legal requirement to have an Investment Strategy Statement (ISS) in place we have not included any questions on this module but have referred to the ISS within the Investment governance module.





Administration

Administration – at a glance



Scheme administration

Fully compliant in 0 out of 1 module



2 questions are red and 1 question is amber out of 16 questions.

Information handling

Fully compliant in 1 out of 4 modules



2 questions are red and 1 question is amber out of 42 questions.

Essential actions

- Admin responsibilities and tasks - Include in governance roles & responsibilities document
- Admin processes - ongoing project to create working processes
- BCP - currently in review
- Policy documented around when data can't be corrected - To create high level policy regarding cases of missing data but ultimately they need to be handled on a case by case basis
- Maintaining own IT - service providers - assurance reports.
- Cyber Policy review when results of cyber scorecard received
- Cyber Controls - service providers assurance reports
NYC, Heywoods, B2C, custodian
- Move to i-Connect remittance functionality would improve efficiency and accuracy
- Check what i-Connect does re contributions vs p.able pay. And what checks are done at year end
- Resolving Conts - Documented process needed for Finance actions on overdue contributions.

IT

Fully compliant in 0 out of 2 modules



3 questions are red and 1 question is amber out of 17 questions.

Contributions

Fully compliant in 1 out of 3 modules



No questions are red and 2 questions are amber out of 13 questions.

Comments

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Administration - changes



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Scheme administration

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

Information handling

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

IT

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

Contributions

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

Administration



Modules

Scheme administration

- Planning and maintaining administration (1)

Information handling

- Financial transactions (1)
- Transfers out (2)
- Record-keeping (3,6)
- Data monitoring and improvement (1)

IT

- Maintenance of IT systems (1)
- Cyber controls (2,6)

Contributions

- Receiving contributions (3)
- Monitoring contributions (1)
- Resolving overdue contributions (1)

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- (6) Partially good practice
- (7) Does not apply





Communications and disclosure

Communications and disclosure – at a glance



Information to members

Fully compliant in 5 out of 5 modules



No questions are red and no questions are amber out of 22 questions.

Public information

Fully compliant in 2 out of 2 modules



No questions are red and no questions are amber out of 14 questions.

Essential actions

None

Comments

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Communications and disclosure - changes



Changes since previous report (if relevant)

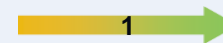
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Information to members

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

Public information

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red



Communication and disclosure



Modules

Information to members

- General principles for member communications (1)
- *Annual pension benefit statements (DC)* (7)
- *Summary funding and pension benefit statements (DB)* (7)
- Benefit information statements (PSPS) (1)
- Retirement risk warnings and guidance (1)
- Notification of right to cash transfer sum or contribution refund (2)
- *Chair's statement* (7)
- Scams (1)
- *Audit requirements* (7)

Public information

- Publishing scheme information (PSPS) (2,6)
- Dispute resolution procedures (2,6)

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- (6) Partially good practice
- (7) Does not apply





Reporting to TPR

Reporting to TPR – at a glance



Regular reports

Fully compliant in 1 out of 1 module



No questions are red and no questions are amber out of 3 questions.

Whistleblowing- Reporting breaches of the law

Fully compliant in 3 out of 4 modules



No questions are red and 1 question is amber out of 11 questions.

Essential actions

- Reporting of Breaches - make sure Finance team are fully aware of requirements to report breaches.
- Contribution payment failures - Senior Fund accountant needs to ensure reporting mechanism is added to process and they are logged on the breaches log

Comments

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Reporting to TPR - changes



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Regular reports

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

Whistleblowing – reporting breaches of the law

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red



Reporting to TPR



Modules

Regular reports

- Registrable information and scheme returns (1)

Whistleblowing - reporting breaches of the law

- Who must report (1)
- Decision to report (1)
- How to report (1)
- Reporting payment failures (1)

Notes:

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The information set out in this report is based on the expectations set out in the Code, compared to your current practice and it is not a regulatory and compliance audit. The information is based on the responses by the Administering Authority to questions set by Aon based on information contained in the Code.

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