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:	14 August 2025

QAS Institute and Faculty of Actuaries Quality Assurance Scheme

AON

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

OFFICIAL - SENSITIVE

The governing body – at a glance

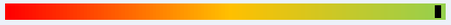
Board Structure and activities

Fully compliant in 5 out of 5 modules

No questions are red and no questions are amber out of 30 questions.

Knowledge and understanding requirements

Fully compliant in 2 out of 2 modules



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

Advisers and service providers

Fully compliant in 1 out of 1 module

No questions are red and no questions are amber out of 19 questions.

Risk Management

Fully compliant in 5 out of 6 modules

No questions are red and no questions are amber out of 50 questions. 1 question is unanswered.

Scheme governance

Fully compliant in 1 out of 1 module

No questions are red and no 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
▪ To review outcome of Hymans knowledge assessment and develop plan from that. Policy created and training requirements put in place.
▪ To review outcome of Hymans knowledge assessment and develop plan from that. Policy created and training requirements put in place.
▪ Expected behaviours & standards to be included in future induction training
▪ K&U assessment completed. Training requirements to be identifed and delivered.
▪ To create ESOG review policy
To discuss with Veritau to include as part of internal audit program. To review an element each year.

Comments

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

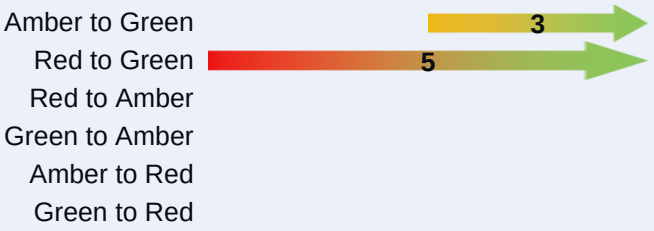
The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

The governing body - changes

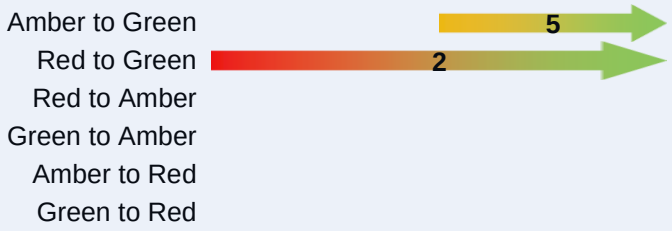
Changes since previous report (if relevant)

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

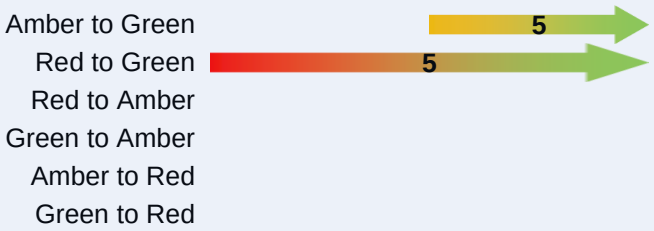


Knowledge and understanding requirements

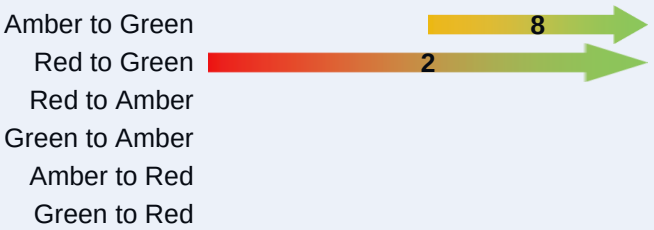


Advisers and service providers

Risk management



Scheme governance



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)

OFFICIAL - SENSITIVE

Funding and investment

OFFICIAL - SENSITIVE

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

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.

Funding and investment - 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).

Investment

Amber to Green	1
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)*

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
* 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 1 out of 1 module

No questions are red and no questions are amber out of 16 questions.

Information handling

Fully compliant in 3 out of 4 modules

No questions are red and 1 question is amber out of 42 questions.

IT

Fully compliant in 2 out of 2 modules

No questions are red and no questions are amber out of 17 questions.

Contributions

Fully compliant in 2 out of 3 modules

No questions are red and 1 question is amber out of 13 questions.

Essential actions

- BCP draft created, with Cyber Security for review
- 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.

Comments

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

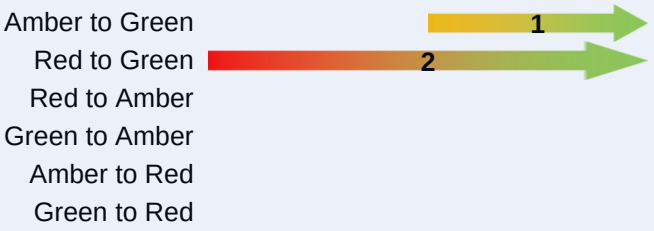
The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

Administration - changes

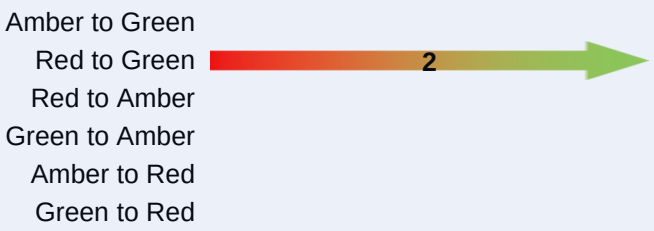
Changes since previous report (if relevant)

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).

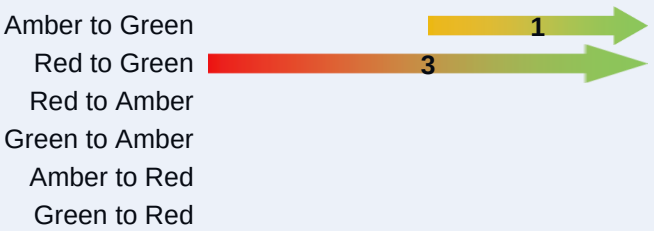
Scheme administration



Information handling



IT



Contributions

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)

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

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

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.

Communications and disclosure - changes

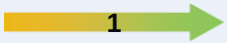
Changes since previous report (if relevant)

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).

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)

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

Reporting to TPR

OFFICIAL - SENSITIVE

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

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.

Reporting to TPR - 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).

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:
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

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.

Aon plc (NYSE:AON) exists to shape decisions for the better - to protect and enrich the lives of people around the world. Our colleagues provide our clients in over 120 countries and sovereignties with advice and solutions that give them the clarity and confidence to make better decisions to protect and grow their business.

Copyright © 2025 Aon Solutions UK Limited and Aon Investments Limited. All rights reserved. aon.com. Aon Wealth Solutions' business in the UK is provided by Aon Solutions UK Limited - registration number 4396810, or Aon Investments Limited – registration number 5913159, both of which are registered in England and Wales have their registered office at The Aon Centre, The Leadenhall Building, 122 Leadenhall Street, London EC3V 4AN. Tel: 020 7623 5500. Aon Investments Limited is authorised and regulated by the Financial Conduct Authority. This document and any enclosures or attachments are prepared on the understanding that they are solely for the benefit of the addressee(s). Unless we provide express prior written consent no part of this document should be reproduced, distributed or communicated to anyone else and, in providing this document, we do not accept or assume any responsibility for any other purpose or to anyone other than the addressee(s) of this document. In this context, "we" includes any Aon Scheme Actuary appointed by you. To protect the confidential and proprietary information included in this document, it may not be disclosed or provided to any third parties without Aon's prior written consent.