

## Non-compliance

GCS ref	Principle	Action Required	Responsible person	Deadline
<b>P8.2</b>	<b>The administering authority has ensured all scheme employers have appropriate arrangements in place for dealing with stage 1 disputes</b>	Review of IDRPs to be carried out, including communication with all employers to determine their arrangements for this.		

## Partial compliance

GCS ref	Principle	Action Required	Responsible person	Deadline
<b>E2</b>	<b>All pension board members to have a personalised training plan in place that is regularly monitored and updated</b>	Completion of the Pension Regulator's (TPR) online toolkit for the new board member  Training record for all board members to be updated  Knowledge and understanding gaps to be identified  Training plan to be drawn up	TO (supported by board members and officers)  BM  All board members  All board members	
The above actions also support the compliance statements included under section P1: Knowledge and understanding – as well as specific other actions detailed below.				
<b>E3</b>	<b>Expenses of the local pension board to be part of the expenses of administration of the pension fund</b>	Detailed budget to be drawn up for the pension fund	Technical Finance Manager / Pension Fund & Treasury Management Accountant	Sept 2019
<b>E6</b>	<b>The administering authority to be satisfied that persons appointed to the local</b>	New board member to complete register of interest.  Non-elected board members to complete annual review of register of interests	TO  TB + BM	

GCS ref	Principle	Action Required	Responsible person	Deadline
	<b>pension board do not have a conflict of interest.</b>	Completion of the Pension Regulator's (TPR) online toolkit module for the new board member	TO (supported by board members and officers)	
The above actions also support the compliance statements included under section P2: Conflicts of Interest – as well as specific other actions detailed below.				
P1.3	<b>The administering authority should establish and maintain policies and arrangements for acquiring and retaining knowledge and understanding</b>	A formal knowledge and understanding policy/training strategy to be developed and implemented	Technical Finance Manager Board	
P1.5	<b>The members of the pension board should be familiar with the AVC options offered by the Fund, including the choice of investments offered to members and the relative performance of those.</b>	The fund has not reviewed its AVC provision for a significant period of time, hence this is something that should be considered.  Briefing session for members of board and committee on AVC provision to be scheduled.	Pensions Administration Team	
P1.6	<b>The administering authority to prepare and keep an updated list of the documents with which they consider pension board members need to be conversant, including the scheme rules and relevant Fund specific documentation.</b>	Full list of updated governance documentation to be produced and published on the pension fund website.  Programme of review and update to be planned and implemented.	Technical Finance Manager	
P1.10	<b>The administering authority to maintain individual training plans for local pension board members</b>	The record of individual training undertaken by board members needs to be updated.  Individualised training plans to be created following this exercise.	All board members	

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P2.1	<b>The administering authority should have in place an appropriate conflicts of interest policy, clearly identifying individual roles in identifying and reporting potential conflicts of interest and to whom any potential conflict should be reported</b>	Formal agreement as to whether a separate conflicts of interest policy for the pension fund should be developed. If not, document compliance with the code of conduct in the constitution for all board members.	Technical Finance Manager / Monitoring Officer	
P4	<b>Managing Risks</b>	Adoption of formal risk management policy for the pension fund Documentation of risks		Workshop 14/9/19
P4.2	<b>The administering authority should have in place a risk register to record all risks and actions taken, which is reviewed regularly</b>	Separate risk registers and issues logs to be developed. Reinstate reporting onto board agendas		
P5.1	<b>The administering authority must be able to demonstrate that they keep accurate, up to date and enduring records to be able to govern and administer the LGPS effectively</b>	Completion of data improvement plan – principally the introduction of <i>i-connect</i>	Data Improvement Officer	
P7.2	<b>The administering authority must provide scheme members with basic scheme information, meeting minimum legal requirements</b>	Work to develop the communications plan, for the implementation of the policy, is scheduled for 2019-20		
P7.4	<b>Where information is provided electronically it should comply with legal requirements</b>	A review will be undertaken during 2019-20 to ensure that the necessary notification process was undertaken to inform members of electronic communication methods only.		

190521 draft action plan

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P7.5	<b>The administering authority should attempt to make contact with their scheme members and where contact is not possible carry out a tracing exercise to locate scheme members.</b>	Deferred members to be contacted via existing contact details. Tracing agent to be considered if required		
P9.1	<b>The administering authority should be satisfied that those responsible for reporting breaches of the law are made aware of their legal requirements and the Pensions Regulator's guidance.</b>	Further improvements are required in the level of understanding of officers, committee and board members in terms of what constitutes a breach, and what should be included on the breaches log.		