

General Code of Practice Plan

Purpose of the Report

1. To update the Board on the progress of implementing changes to the Fund's internal controls as a result of the new General Code of Practice.

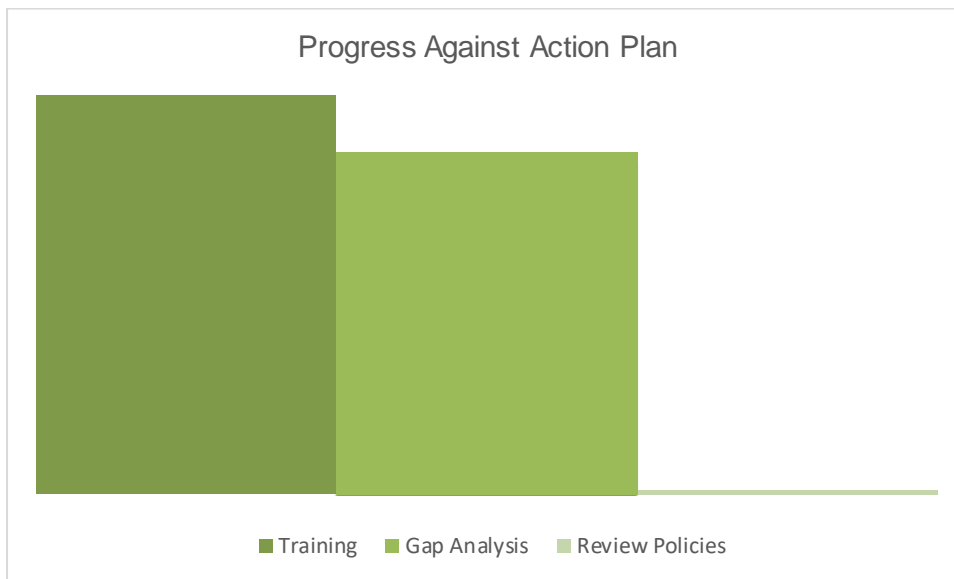
Background

2. The Pension Regulator's (tPR) General Code of Practice came into force on 28th March 2024.
3. The new General Code of Practice consolidates 10 of the existing Codes into one Code. It also addresses the governance requirements arising from the UK's implementation of IORP II which expects trustees to have an "effective system of governance" and schemes to complete an "own risk assessment".
4. We need to identify the required changes to our current processes, check current policies and procedures are fit for purpose, and implement changes where necessary.
5. In the new code, tPR refers to legal duties using the word 'must'. tPR's expectations are referred to using 'should'. tPR uses 'need' where there is no expectation or legal requirement in place, but that process is necessary to allow a scheme to operate. In some modules, tPR highlights expectations as a matter of best practice for certain schemes.
6. As a larger more sophisticated scheme, tPR would expect us to meet most of the 'should' expectations in the Code.
7. The new Code is far from just a consolidation of existing tPR standards and we are planning for a new workstream to ensure that no current activities cut across the requirements.

Action Plan

8. Training - do we understand the requirements of the new General Code of Practice?
9. Gap analysis - do we know what areas we will need to work on to be compliant?
10. Review or establish new policies - review our existing policies alongside the Code and consider whether additional policies will be required. Some may be new, for example considering climate change or cyber risk.

Progress against Action Plan



Training

11. Hymans Robertson provided the tPR General Code of Practice training sessions on 20th and 21st March 2024 for both members of the Committee and LPB and officers. This focused on the following three sections:

- tPR's expectations for the conduct and practice of those responsible for managing and administering the public sector schemes
- Themes from existing Codes condensed into shorter, topic-focused modules
- New modules covering current topics such as cyber security and scams

HYMANS  ROBERTSON

Fund Officers - TPR General Code of Practice - 2024

Ian Colvin and Alan Johnson
20th March 2024

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Gap Analysis

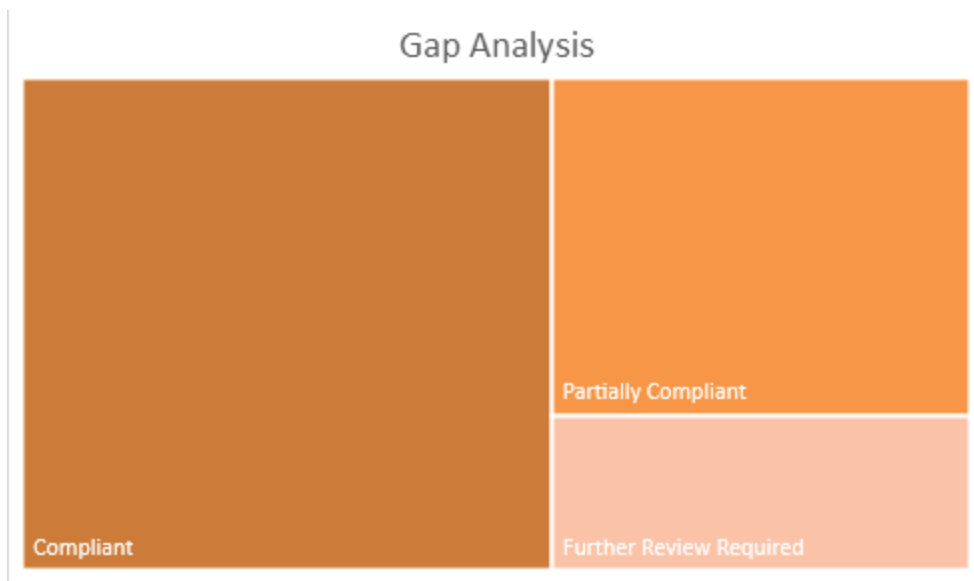
12. There are 43 areas of the Code covering Governance, Operations, Administration, Accounts and Investments.

13. Having reviewed each of these areas we have identified the following areas are Compliant, Partially Compliant or Further Review Required:

Compliant * (24)

Partially Compliant (13)

Further Review Required (6)



* To be Compliant in an area we must be confident we fulfil all 'must' and 'should' standards in the relevant area of the Code. One single item that is needing review will result in us being Partially Compliant in that area.

14. The majority of our Partially Compliant areas are where we have the relevant policies and procedures in place, but would want to strengthen them to bring them in line with our elevated standards.

Review or establish new policies

15. A full project plan has been prepared to scope out the policies requiring review. Priorities and timescales will be added to ensure we can illustrate progress made against the Code and reach our target of full compliance.

16. The role for the Quality Assurance Lead remains vacant, once this role has been appointed to we will be able to pick up the pace with progress towards evidencing full compliance.

Environmental Impact of the Proposal

17. Not applicable.

Financial Considerations & Risk Assessment

18. Not applicable

Legal Implications

19. There are no material legal implications from this report.

Safeguarding Considerations/Public Health Implications/Equalities Impact

20. There are no known implications at this time.

Proposals

21. The Committee is asked to note the progress of implementing changes to the Fund's internal controls as a result of the new General Code of Practice.

Jennifer Devine
Head of Wiltshire Pension Fund

Report Author: Mark Briggs, Operations Manager

Unpublished documents relied upon in the production of this report: NONE