

Code of practice no.14 compliance statement

Section	Sub-section	Legal requirement	TPR's guidance	How we Comply
Governing your scheme	Knowledge and understanding required by pension board members [34 – 60]	<p>A member of the pension board of a public service pension scheme must be conversant with:</p> <ul style="list-style-type: none"> • the rules of the scheme, and • Any document recording policy about the administration of the scheme which is for the time being adopted in relation to the scheme. <p>A member of a pension board must have knowledge and understanding of:</p> <ul style="list-style-type: none"> • the law relating to pensions, and • Any other matters which are prescribed in regulations. 	<ol style="list-style-type: none"> (1) Schemes should establish and maintain policies and arrangements for acquiring and retaining knowledge and understanding [38]. (2) Schemes should designate a person to take responsibility for (1) [38]. (3) Schemes should prepare and keep an updated list of documents with which they consider pension board members need to be conversant [46] (4) Clear guidance on the roles and responsibilities and duties of boards and its members should be set out in scheme documentation [47]. (5) Schemes should assist pension board members to determine the degree of knowledge and understanding needed [48]. (6) Schemes should provide board members with the relevant training and support that they require [55]. (7) Schemes should offer pre-appointment training or arrange for mentoring by existing board members [56]. (8) Pension board members should undertake a personal training needs analysis [57]. (9) Learning programs should be flexible [58]. (10) Schemes should keep appropriate records of the learning activities of board members [60]. 	<p>The Fund's existing training policy has been amended to reflect the requirements for Knowledge and Understanding. This is reviewed regularly.</p> <p>The Fund's Governance & Risk Officer is responsible for all training matters.</p> <p>Terms of Reference for the Pension Board specify roles and responsibilities and these are documented accordingly.</p> <p>Board members have been introduced to the new CIPFA Knowledge and Skills Framework for Local Pension Boards, published in July 2015.</p> <p>Training and support needs will be assessed and develop in line with Board member needs. Training needs will be identified in a number of ways including self-identified (by Board members) needs and those identified or suggested by the Fund's officers. Additionally, all Board members are required to have completed the TPR Public Service Toolkit online training.</p> <p>Regular Workshops are arranged to meet training needs. Additionally, the Fund have purchased access to the Intuition Know-How Online Library which provides online training modules covering all aspects of pension's information. External training and conferences also support training needs.</p> <p>Board members are encouraged to discuss their learning needs and experiences at each Board meeting and to ask for the support they need from the Fund for their ongoing learning.</p> <p>Records are being maintained of all formal training attended by Board members and reported on periodically.</p>

	<p>Conflicts of interest and representation [61 – 91].</p> <p>In relation to the pension board, scheme regulations must include provision requiring the scheme manager to be satisfied:</p> <ul style="list-style-type: none"> • that a person to be appointed as a member of the pension board does not have a conflict of interest and • from time to time, that none of the members of the pension board has a conflict of interest. <p>Scheme regulations must require each member or proposed member of a pension board to provide the scheme manager with such information as the scheme manager reasonably requires for the purposes of meeting the requirements referred to above.</p> <p>Scheme regulations must include provision requiring the pension board to include employer representatives and member representatives in equal numbers.</p>	<ol style="list-style-type: none"> (1) The 'Seven principles of public life' should be applied to all board members [70]. (2) Schemes should incorporate these principles into any codes of conduct (and across their policies and processes) and other internal standards for boards [70]. (3) Take professional legal advice when considering issues to do with conflict of interests [74]. (4) Schemes should ensure that there is an agreed and documented conflicts policy and procedure which should be kept under regular review [76]. (5) Schemes should cultivate a culture of openness and transparency [78]. (6) Board members should have a clear understanding of their role and the circumstances in which they may find themselves in a position of conflict of interest [78]. (7) Board members should know how to manage potential conflicts [78]. (8) Pension board members should be appointed under procedures that require them to disclose any interests or responsibilities which could become conflicts of interest [80]. (9) All terms of engagement should include a clause requiring disclosure of all interests and responsibilities which could become conflicts of interest as soon as they arise [81]. (10) All disclosed interests should be recorded [81]. (11) Schemes should consider what important matters or decisions are likely to be considered during, for example, the year ahead and identify and consider any potential or actual conflicts [82]. (12) Identify, evaluate and manage dual interests [83]. (13) Use a register of interests to record and monitor dual interests [84]. 	<p>The Local Pension Board has been established having had regard to the requirements set out in legislation and guidance.</p> <p>All Board Members have completed a Register of Interests declaration having had regard to the Board's Code of Conduct and Conflict of Interests Policy, which was approved in October 2015.</p> <p>The agenda for each Board meeting includes a declaration of pecuniary and non-pecuniary interests in relation to matters under consideration on that agenda. Any such declarations are minuted.</p> <p>The Register of Interest will be reviewed on an annual basis and all Board Members received training at an induction session prior to the first meeting of the Board. Advice on potential conflicts can be sought from Democratic Services officers at any time.</p>
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	<p>Publishing information about schemes [92 – 99]</p>	<p>The scheme manager for a public service scheme must publish information about the pension board for the scheme(s) and keep that information up-to-date.</p> <p>The information must include:</p> <ul style="list-style-type: none"> • who the members of the pension board are • representation on the board of members of the scheme(s), and 	<p>(1) Schemes should also publish useful related information about the pension board such as set out in 96 and 97.</p> <p>(2) Have policies and processes to monitor all published data on an ongoing basis to ensure it is accurate and complete [98].</p>	<p>The Fund has a dedicated web page that includes details such as:</p> <ul style="list-style-type: none"> • Board membership ; • Board terms of reference; • A link to the Lancashire County Council website detailing agendas and minutes of the Board's meetings <p>The Fund publishes all statutory documents on the Your Pension Service website www.yourpensionservice.gov.uk The website is reviewed at least annually and updated accordingly, as are other media such as leaflets/guides etc.</p> <p>Additionally whenever regulatory or other significant changes occur, relevant media/documentation are reviewed and changed at the time.</p>

		<ul style="list-style-type: none"> the matters falling within the pension board's responsibility. 		
Managing risks	Internal controls [101 – 120]	<p>The scheme manager of a public service pension scheme must establish and operate internal controls. These must be adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules and in accordance with the requirements of the law.</p>	<ol style="list-style-type: none"> Internal controls should include a clear separation of duties, processes for escalation and decision making and documented procedures for assessing and managing risks, reviewing breaches of law and managing contributions to the scheme [103]. Internal controls should address significant risks which are likely to have a material impact on the scheme [105]. Sufficient time and attention should be spent on identifying, evaluating and managing risks and developing and monitoring appropriate controls [105]. <p><u>Identifying risks</u></p> <ol style="list-style-type: none"> Schemes should carry out a risk assessment [106]. Schemes should record risks in a risk register and review it regularly [108]. Schemes should keep appropriate records to demonstrate compliance [108]. <p><u>Evaluate risks and develop internal controls</u></p> <ol style="list-style-type: none"> Prioritise risks where the impact and likelihood of the risk materialising is high [109]. Review any existing internal controls [110]. Design internal controls to mitigate main risks and consider how best to monitor them [111]. <p><u>Monitor controls effectively</u></p> <ol style="list-style-type: none"> Schemes should periodically review the adequacy of internal controls [115]. Internal or external audits and/or quality assurance processes should ensure that 	<p>Internal controls are designed to manage risks facing the fund. As such, the starting point for the fund's approach is the risk register.</p> <p>The Fund have developed and implemented a Risk Management Framework. The framework sets out the internal controls for management of risks to the Fund.</p> <p>The risk register is a 'live' document which is reviewed regularly in collaboration with LPP and presented to the Board and Committee every 6 months.</p> <p>The risk register categorises risks into four primary groupings. Each risk is then rating on the basis of likelihood and impact after assessing the mitigating factors which are in place.</p> <p>The Fund works collaboratively with LPP to identify new risks and ensure that appropriate mitigation is in place for all risks, especially those rated as being a high risk to the Fund.</p> <p>LPP has increased the size of its risk team throughout 2019 and is implementing a new risk management system to provide greater granularity of risk ownership and mitigation. More detailed management information packs will be generated for the Fund by LPP and these will be rolled out in Q.2, 2020.</p> <p>Some level of financial risk is both known and tolerated to generate the required levels of return. This level of 'risk tolerance' is set out in the Investment Strategy Statement (ISS).</p> <p>The risk register serves to track performance in managing risks and ensure a focus on changes in the risk landscape.</p> <p>A documented internal compliance regime reviews progress in managing risk and ensures that risk owners are accountable accordingly. Clearly, some risks are more significant than others and their relative scale drives the resource input devoted to such; for example the Investment panel and associated due diligence</p>

			<p>adequate internal controls are in place and being operated effectively [116].</p> <p>(12) Review internal controls when substantial changes take place or where a control has been found to be inadequate [116].</p> <p><u>Suggested internal controls</u></p> <p>(13) Internal controls that regularly assess the effectiveness of investment-related decision making.</p> <p>(14) Internal controls that regularly assess the effectiveness of data management and record-keeping.</p> <p>(15) Internal controls that ensure that new employers understand what member data is required and how it should be supplied [112].</p> <p>(16) Internal controls that require internal or external auditors to audit any automated systems [112].</p> <p>(17) Internal controls to ensure that systems support the maintenance and retention of good member records [112].</p> <p>(18) Internal controls that ensure that data are complete (e.g. undertake a data-cleansing or member tracing exercise and review this on a regular basis (at least annually or at regular intervals that they consider appropriate) [112].</p> <p>(19) Ensure that all staff completes information management training before they are given access to sensitive data.</p> <p>(20) Ensure that member communications are reviewed regularly [112]</p> <p>(21) Schemes should put in place systems and processes for making an objective assessment of the strength of an employer's covenant.</p>	<p>processes ensure a clear separation of duties and a documented decision-making mechanism. Similarly rigorous separation of duties apply to the pensions payroll function which controls around £250m of pension payments annually.</p> <p>Controls are reviewed in a number of ways, such as lessons learned, internal and external audit and continuous improvement drivers.</p> <p>Significant reliance is placed upon both internal and external audits, which review and test existing controls. These audits have led to improved practice.</p> <p>Detailed monitoring takes place monthly in respect of investment performance and associated governance/control issues.</p> <p>All incidents are logged on an incident log and are investigated.</p> <p>The fund manages enormous volumes of complex and dynamic data and as such commits significant resource to keeping data clean and up to date in a number of ways.</p> <p>Internal data cleansing regimes apply, but just as importantly, significant resource is dedicated to supporting employers to ensure they can comply with the fund's data requirements. It is not possible within this document to specify all areas of compliance with the Regulator's suggested internal control framework, however:</p> <ul style="list-style-type: none"> • Information governance training forms part of induction and annual review; • Member communications are reviewed and fine-tuned in the light of feedback • The Fund has established processes and resources to assess employer covenant and proactively manage the outcome of such assessments.
Administration	Scheme record-keeping [122 – 146]	Scheme managers must keep records of information relating to:	<p>(1) Schemes should be able to demonstrate to the regulator, where required, that they</p>	<p>Details of Pension Board meetings are available via the Fund's website www.yourpensionservice.org.uk</p>

	<ul style="list-style-type: none"> • member information • transactions, and • pension board meetings and decisions <p>Schemes must ensure that processes that are created to manage scheme member data meet the requirements of the Data Protection Act 1998 and the data protection principles.</p>	<p>keep accurate, up-to-date and enduring records [124].</p> <ol style="list-style-type: none"> (2) Schemes should establish and operate adequate internal controls to support record-keeping requirements [125]. (3) Member data should be subject to regular data evaluation [126]. (4) Schemes should require employers to provide them with timely and accurate data [128 and 130]. (5) Schemes should seek to ensure that employers understand the main events which require information to be passed to the scheme [129]. (6) Schemes should be able to trace the flow of funds into and out of the scheme and reconcile these against expected contributions and scheme costs [131]. (7) In respect of keeping information about the pension board, schemes should also keep records of key discussions [133]. (8) Records should be retained for as long as they are needed [135]. (9) Schemes should have in place adequate systems and processes to enable the retention of records for the necessary time periods [135]. (10) Schemes should monitor data (based on a proportionate and risk based approach) on an ongoing basis to ensure it is accurate and complete [136,137]. (11) Schemes should carry out a data review exercise at least annually [138]. (12) Schemes should continually review their data [138]. (13) Upon change of admin system, schemes should review and cleanse data records [140] (14) Schemes should put in place a data improvement plan where poor quality or missing data is identified [141]. 	<p>A data cleaning schedule specifies data cleaning activities during the year. The cleanliness of this data is compared to targets set out by the Pensions Regulator. YPS is working on implementing electronic data quality reporting routines, covering employers' and scheme data quality.</p> <p>LPP completed a data cleanse activity ahead of the June valuation submission, and such data cleanses and the tracking down of missing leaver forms is ongoing.</p> <p>A records retention policy is in place. Most records are stored electronically, and paper records are in the main stored with LCC's records management team, who securely destroy records in line with the Fund's record retention policy.</p> <p>LPP are compliant with the GDPR Regulations (Data Protection Act 2018).</p> <p>Fund flows into and out of the scheme are reconciled on an aggregate basis. Work is in hand to further refine this process, at a detail level.</p> <p>The Fund has a policy for chasing and tracing missing or inaccurate member records. There are a significant number of deferred members whose current details are not known. The service takes a proportionate and risk-based approach in using resource to trace and chase such records.</p> <p>Comparisons of active member data with employer payroll data occur each pay period. Reconciliations between pay and contributions are carried out on a monthly basis. An engagement team works with employers to ensure the importance of data accuracy and record keeping is communicated.</p> <p>The Fund's Pensions Administration Strategy Statement (PASS) outlines mechanisms and deadlines for employers' submission of data to the fund. A number of employers do not meet these deadlines, and an ongoing training and support programme provides support to employers to enable them to comply</p>
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			(15) Schemes should reconcile member records with information held by the employer [142].	<p>Additionally the Employer Guide sets out in some detail the Fund's specific data requirements.</p> <p>The Fund's Business Continuity Plan specifies actions to mitigate the impact of various scenarios including loss of IT systems.</p>
	Maintaining contributions [147 – 186]	<p>Employer contributions must be paid to the scheme in accordance with any requirements in the scheme regulations. Where employer contributions are not paid on or before the date they are due under the scheme and the scheme manager has reasonable cause to believe that the failure is likely to be of material significance to the regulator in the exercise of any of its functions, the scheme manager must give a written report of the matter to the regulator as soon as reasonably practicable.</p> <p>Where employee contributions are not paid within the prescribed period, if the scheme manager has reasonable cause to believe that the failure is likely to be of material significance to the regulator in the exercise of any of its</p>	<p>(1) Scheme managers should have effective procedures and processes in place to identify payment failures that are – and are not – of material significance to the regulator [150 to 151].</p> <p>(2) Such procedures are likely to involve:</p> <ul style="list-style-type: none"> (i) Developing a record to monitor the payment of contributions. (ii) Monitoring the payment of contributions. (iii) Managing overdue contributions. (iv) Reporting payment failures which are likely to be of material significance to the regulator [152]. <p><u>Developing a record to monitor the payment of contributions</u></p> <p>(3) Schemes should have a contributions monitoring record [155 to 157].</p> <p><u>Monitoring the payment of contributions</u></p> <p>(4) Schemes should monitor contributions on an on-going basis [161].</p> <p>(5) A risk based and proportionate monitoring approach should be used to identify employers and situations which present a higher risk of payment failure [162].</p> <p>(6) Schemes should have a process in place to identify where payments are late or have been underpaid, overpaid or not paid at all [163].</p> <p>(7) Scheme managers must record and retain information on transactions (including any</p>	<p>Established processes are in place to manage employer contributions due, and their payment.</p> <p>Employer and employee contributions are monitored and collected through a bespoke web-based system known as EPIC. This electronic interface has been used for some years by the Fund's administration team and the functionality to monitor and collect contribution income was added in the last two years.</p> <p>Employers, or payroll providers, are required to log-in to the system and input, on a monthly basis, data at a total employer level. The finance team does not have access to individual member data through the EPIC system. Data required as part of this monthly process is in respect of pensionable pay for the period, employer and employee contributions analysed between regular, deficit and other contributions – with disclosure of amounts in respect of the 50:50 option separately identified.</p> <p>There are standard and non-negotiable deadlines around the EPIC process. Little flexibility is available since the direct debit process must be run to the regulatory deadline of 19th of the month.</p> <p>The system categorises submissions from employers into different 'statuses' for example – 'incorrect % applied to pensionable pay', 'missing contributions', 'adjustments'. The finance team will review all entries in each status and take the appropriate action to ensure that the correct amounts are collected each month. Any breaches are included on the Fund breaches log and procedures for follow-up and escalation have been established.</p> <p>A reconciliation between the EPIC system, the Oracle financial system and the Altair pension payroll is performed on a</p>

		<p>functions, they must give notice of the failure to the regulator and the member within a reasonable period after the end of the prescribed period. Where there is a failure to pay employee contributions on an earlier date in accordance with scheme regulations, schemes should also consider their statutory duty under section 70 of the Pensions Act 2004 to assess and if necessary report breaches of the law.</p>	<p>employer and employee contributions) [166].</p> <p><u>Managing overdue contributions</u></p> <p>(8) Where a payment failure is identified, there should be a process to follow to resolve the issue quickly (including the suggested steps set out in the Code) [169].</p> <p>(9) Schemes should keep a record of their investigation and communications between themselves and the employer [170].</p> <p>(10) Schemes should have a process which is able to detect deliberate underpayment or non-payment or other fraudulent behaviour by an employer [171].</p> <p><u>Reporting payment failures which are likely to be of material significance to the regulator</u></p> <p>(11) Where schemes identify a payment failure, they should attempt to recover contributions within 90 days of their due date [174].</p> <p>(12) Where a payment failure is identified it should at least ask the employer the 3 questions set out in 175.</p> <p>(13) Schemes should investigate the payment failure and use their judgement when deciding whether to report to the regulator taking into account the wording of the Code [177].</p> <p>(14) Schemes should consider whether it is appropriate to report payment failures of employer contributions to members where it is reported to the regulator [182].</p> <p>(15) Reports to the regulator should be made in accordance with the code.</p>	<p>monthly basis. These reconciliations are designed to ensure accuracy and consistency of reporting and should also highlight any missing or late contributions along with any under / over payments.</p> <p>The Fund's policy is to collect contributions by direct debit. If a contribution remittance advice is not received from an employer in line with the direct debit deadline then the Fund will collect an amount equal to the previous month. This maintains cashflow to the Fund but requires confirmation from the employer in the following month and will usually result in an adjustment to the following month's collection remittance in order to correct the actual contributions as a percentage of pensionable pay. A record is maintained of any contributions collected as a result of this back-up procedure.</p> <p>A procedure has been established to ensure that repeat failure to submit remittances on time is recorded on the Fund breaches log and remedies applied as necessary – whether this be through application of financial penalties or in the case of admitted bodies, contractual penalties can be applied. System invoices are generated as a result of the direct debit process. These invoices are not sent to employers but are recorded in the Oracle financials system. Non-payment will result in outstanding debt which will be identified and chased by either the Fund or the LCC income and debt management team.</p> <p>Any returned or failed direct debits are notified to the Fund finance team by the LCC banking team and are followed up immediately with employers and providers who will be asked to pay immediately by BACS if necessary or other remedies may be applied. Again, any ongoing payment issues should be recorded on the breaches log.</p> <p>All employers are monitored in the same way. E-mail correspondence between the finance team and employers/providers is retained and information extracted from EPIC into excel is annotated for relevant comments regarding discussions and action taken.</p>
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	<p>Providing information to members [187 – 211]</p>	<p>The law requires schemes to disclose information about benefits and scheme administration to scheme members and others.</p> <p>The Code summarises the legal requirements around -</p> <ol style="list-style-type: none"> (1) Benefit statements [188 – 195] (2) Other information about scheme administration [196 – 197]. (3) Who is entitled to information [198 – 199] (4) When basic scheme information must be provided [200 – 201] (5) What information must be disclosed on request [202] (6) How benefit statements and other information must be provided [203 – 206] <p>Scheme should also comply as appropriate with other legal disclosure requirements [211].</p>	<ol style="list-style-type: none"> (1) Schemes should design and deliver communications to scheme members in a way that ensures they are able to engage with their pension [207]. (2) Information should be clear and simple to understand as well as being accurate and easily accessible [207]. (3) Schemes should attempt to make contact with their scheme members and, where contact is not possible, schemes should carry out a tracing exercise to locate the member and ensure that their member data are up-to-date [208]. (4) Where a person has made a request for information, schemes should acknowledge receipt if they are unable to provide the information at that stage [209]. (5) Schemes may encounter situations where the time period for providing information takes longer than expected. In these circumstances, schemes should notify the person and let them know when they are likely to receive the information [209]. (6) Information should be readily available at all times to ensure that members are able to access it when they require [210]. 	<p>YPS uses a wide range of communications media such as:</p> <ul style="list-style-type: none"> • An electronic self -service "my pension online" facility and the YPS website, both of which allow members to access pensions information 24/7 • YPS have commenced publishing certain information on line where possible i.e P60s for 2018 were published online. • Annual benefit statements that are produced annually and made available to all members via the online facility. Members who choose to opt out of e communication are provided with a paper copy. • Face to face presentations to groups and one to one appointments at pension surgeries are offered to all members • A dedicated helpdesk and email facility are available to members • Whilst not promoted, face to face member support is available via Preston based premises. • Experienced caseworks can be contacted for more technical support (alongside an internal technical team). <p>All information whether electronic, written or face to face is delivered in a simple and clear manner avoiding pension jargon. The details of when and what information is provided to members is contained in the communications policy statement that is published on the YPS website at: https://www.yourpensionservice.org.uk/local_government/index.asp?siteid=5921&pageid=33736&e=e</p> <p>The Fund makes every attempt to contact scheme members. When contact attempts have not been possible, attempts at tracing are made as follows:</p> <ul style="list-style-type: none"> • for active members the service contacts the employer for up to date details;
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Resolving Issues	Internal dispute resolution [212 – 240]	Scheme managers must make and implement dispute resolution arrangements that comply with the requirements of the law and help resolve pensions disputes between the scheme manager and a person with an interest in the scheme.	<ol style="list-style-type: none"> (1) In terms of the LGPS, the requirements relating to IDRP are prescribed in the LGPS regulations. (2) Schemes should publish and make IDRP time limits readily available [225]. (3) Schemes should be satisfied that the time taken to reach a decision is appropriate to the situation and be able to demonstrate this, if necessary. [230 and 240] (4) Schemes should provide the applicant with regular updates on the progress of their investigation. They should notify the applicant where the time period for a decision is expected to be shorter or longer than the reasonable time period and let them know when they are likely to receive an outcome [232]. 	<p>Details of the Internal Dispute Resolution Procedure (IDRP) are published on the Fund's website and contained within the employee's brief and full guide. In addition the appeals application form, also available on the website, contains further guidance for members including the specific time limits imposed by the IDRP.</p> <p>Those documents are reviewed regularly to ensure that they are in line with amending legislation and procedures. (The latest versions can be viewed at the link below):</p> <p>https://www.yourpensionservice.org.uk/local-government-scheme/members-active-deferred-pensioner/guides-leaflets-and-forms/</p> <p>Procedures for employers are also contained within the employer guide on the website. In addition a guide for</p>

			<p>(5) Schemes should focus on educating and raising awareness of their internal dispute resolution arrangements and ensuring that they are implemented [233].</p> <p>(6) Schemes should ensure that the effectiveness of the arrangements is assessed regularly and be satisfied that those following the process are complying with the requirements set, which includes effective decision making [234].</p> <p>(7) Schemes should confirm and communicate their arrangements to members, for example, in the joining booklet [235].</p> <p>(8) Schemes should make their arrangements accessible to potential applicants, for example by publishing them on a scheme website [235].</p> <p>(9) Schemes should ensure they make the following information available to applicants:</p> <ul style="list-style-type: none"> (i) The procedure and processes to apply for a dispute to be resolved; (ii) The information that an applicant must include; (iii) The process by which any decisions are reached; and (iv) An acknowledgement once an application has been received [239]. 	<p>employers is also available, used particularly for employers who have a new adjudicator reviewing a stage 1 case.</p> <p>Training for employers and bulletins highlighting problem areas such as Ill health determinations are utilised where appropriate.</p> <p>In respect of stage 1 and stage 2 IDRP cases, a task management process exists through the pensions administration system to ensure that the appropriate deadlines and notifications are provided to members and representatives involved in the IDRP and that those deadlines are adhered to. Bespoke documentation covers acknowledgements and details of extensions to time limits. Procedures for stage 2 are regularly updated.</p> <p>The right to appeal a decision under IDRP is part of all YPS documentation where a decision is being taken that may affect a member or prospective member's benefits, whether that be an administering or employing authority decision.</p> <p>A log of all appeal cases is kept detailing dates when cases are received, acknowledged and determined.</p>
	Reporting breaches of the law [241 – 275]	<p>Certain people are required to report breaches of the law to the regulator where they have reasonable cause to believe that:</p> <ul style="list-style-type: none"> • a legal duty which is relevant to the administration of the scheme has not been, or is not being, complied with • the failure to comply is likely to be of material 	<p>(1) Schemes should be satisfied that those who are responsible for reporting breaches are made aware of the legal requirement and the Code [244].</p> <p>(2) Training should be provided for scheme managers and pension board members [244].</p> <p>(3) All others under a statutory duty to report should ensure they have sufficient level of knowledge and understanding to fulfil that duty [244].</p> <p>(4) Those with a statutory duty to report should establish and operate appropriate</p>	<p>The Fund have a Breaches Policy in place.</p> <p>Training on Code of Practice 14, GDPR and reporting breaches of the law have been given to all Board members. All others under a 'statutory duty' to report have also received relevant training.</p> <p>Systems are now in place to record and report breaches for contributions and data;</p> <p>When and how breaches are reported to the Pension Regulator is documented within the Breaches Policy.</p>

		significance to the regulator in the exercise of any of its functions.	<p>and effective procedures in regards to reporting breaches [245].</p> <p>(5) Those procedures should be in accordance with and take into account paragraphs 245 to 262 of the Code.</p> <p>(6) Reports made to the Regulator should be submitted in accordance with paragraphs 263 to 271.</p>	
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