

Key:

	New Requirements with potential gaps
	Existing requirements which incorporate new guidance within the module
	Existing or New requirements with <b>no</b> gaps identified
	Module does not apply to Local Government Pension Scheme

The modules highlighted in red text are not mandatory for the Local Government Pension Scheme however it is indicated as best practice to follow and implement requirements

Lancashire County Pension Fund

Single Code of Practice – Gap Analysis

The Governing Body

Module Number	Module Title/Description	New/Existing	Potential Gaps	Comment	Action
TGB001	Role of the governing body – How the Fund is managed and the structure	New	<ul style="list-style-type: none"> <li>Clarity on what is meant by governing body. Initial consultation indicates Pension Board and Scheme Manager but further detail is required.</li> </ul>	<p>This module covers expected behaviours and standards of the governing body, i.e., those responsible for running the Pension Fund. The Committee and the Local Pension Board adhere to Lancashire County Council members and Co-Opted members policy accessible by the link below:</p> <p><a href="https://council.lancashire.gov.uk/documents/s179038/Appendix%20E.pdf">https://council.lancashire.gov.uk/documents/s179038/Appendix%20E.pdf</a></p> <p>The Board and Committee also adhere to the Nolan principles.</p> <p>Members of the Pension Fund Committee and Local Pension Board are required to complete a declaration of interest and the Fund maintains a Register of Interests.</p> <p>The Independent Investment Advisers who advise the Head of Fund and report to the Pension Fund Committee have relevant Indemnity Insurance.</p>	TPR to fully clarify in the final regulations what the term governing body refers to for the LGPS
TGB014	Recruiting to the governing body – Appointing members to a governing body	New	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>The Fund has a process in place in recruiting members to the Local Pension Board.</p> <p>When new members are appointed gaps in skills and competencies are assessed and addressed over time. The Fund has a training schedule in place and also offers members to attend external training sessions which are</p>	

				run by reputable organisations from the LGPS arena.  The Board and Committee have Terms of Reference detailing what representation is on these committees. Democratic Services maintain a succession plan for recruiting members to the board.	
TGB044	Member-nominated trustee appointments	DNA	• None		
TGB015	Role of the chair – Defined responsibilities of the chair	Existing	• None	The Chair's role for the Local Pension Board is outlined in the Terms of Reference. There are also specific details regarding obligations outlined in the contract signed by the Chair of the Local Pension Board.	
TGB006	Meetings and decision-making – recording details of all meetings and decisions made	New	• None	Democratic Service have processes in place to ensure details of all meetings are recorded and minutes are produced. This includes details of all attendees from the relevant committees.  There are also set processes for establishing meetings and recording decision making.  There are set Terms of Reference for the Pension Fund Committee, Local Pension Board and Investment Panel.  The Fund has a records retention policy 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.	Clarity required on retention policy for decision making.
TGB016	Remuneration policy – Remuneration for those undertaking fund related activities	New	• (Remuneration Policy) – covered through LCC councillors' expenses and allowances	Not mandatory for Public Sector scheme under section 249A of the Pensions Act 2004 however is best practice for all schemes	Review implementation of this across the LGPS and consider application to the circumstances of LCPF
TGB017	Working knowledge of pensions – Governing bodies ability to demonstrate a level of understanding to fulfil their duties	Existing	• None	This requirement covers knowledge of legislation, scheme, risk management, administration and other providers and communications.  Local Pension Board members undertake a training needs analysis each year and this was extended to Committee members for this financial year. The outcomes of these requirements enabled the Fund officers to develop a training programme based on the gaps identified in the needs analysis.	

TGB005	Governance of knowledge and understanding	DNA	<ul style="list-style-type: none"> <li>None</li> </ul>		
TGB003	Building and maintaining knowledge – Governing body to be able to demonstrate a level of knowledge and experience to run the scheme effectively	New	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>Members have an opportunity to attend regular training sessions covered by the Fund officers or facilitated by reputable external LGPS training providers.</p> <p>A training record including record of attendance is maintained by Democratic Services.</p> <p>Knowledge and Understanding is assessed annually to develop a training plan to cover gaps.</p>	
TGB009	Value for members – Assessment if DC product represents good value for members	New	Assess if this applies to AVC product	This section in its entirety does not apply to Defined Benefit and Public Service schemes however may apply to the AVC product provided by the Fund to its members.	Await final regulations from TPR and assess its application across the LGPS to understand if the AVC product is subject to this module.
TGB010	Managing advisers and service providers – Demonstrate that governing bodies can effectively manage relationships	New	<p>Advisers and service providers include:</p> <p>Independent Investment Advisers; Local Pensions Partnership Administration; Local Pensions Partnership Investment; Mercer (the Fund Actuary); and Northern Trust (the Fund Custodian).</p>	Potential Gap is to ensure the processes for appointing advisers and service providers such as selection, appointing, managing, and replacing providers are fully documented.	Review final regs to ascertain depth of requirement for Public Service Pension Schemes Review module with Legal Services, Finance and Procurement
TGB031	Identifying and assessing risks – Establish and operate internal controls which are adequate for the purpose of securing that the scheme is managed in accordance to scheme rules	Existing	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>All Fund risks are managed in line with the Fund Risk Management Framework, which can be found here:</p> <p><a href="https://lancashirecountypensionfund.org.uk/media/1074/lcpf_rmf_v1.pdf">https://lancashirecountypensionfund.org.uk/media/1074/lcpf_rmf_v1.pdf</a></p> <p>The risk management framework is reviewed every three years.</p> <p>The fund has a live risk register which is reviewed quarterly, and full review is conducted bi-annually.</p> <p>Risks areas which are covered are around:</p> <ul style="list-style-type: none"> <li>Emerging</li> <li>Investment</li> <li>Operational</li> <li>Member</li> <li>Transitional</li> </ul> <p>Investment risk is also assessed by the Investment Panel.</p>	

TGB032	Managing risk using internal controls - Establish and operate internal controls which are adequate for the purpose of securing that the scheme is managed in accordance to scheme rules	Existing	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>The risk register is a 'live' document which is reviewed regularly in collaboration with LPPA, LPPI, Independent Investment Advisers and LCC Finance. The full register is presented to the Board and Pension Fund Committee every 6 months. The Board also review key risks in between the 6 month reviews.</p> <p>The risk register categorises risks into five 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 Officers of the Fund ensure that appropriate mitigation is in place for all risks, especially those rated as being a high risk to the Fund.</p> <p>The Fund instigated a project to develop the Fund Risk Register in 2021/22. The development enhanced risk assessment through the use of risk templates for each specific risk and also a heatmap to visually articulate risk ratings for all Fund risks.</p> <p>The Fund works collaboratively with the Local Pensions Partnership (LPP) to identify new administration and/or investment risks.</p>	Review module with Internal Audit to ensure that the fund is adequately managing risk using internal controls.
TGB033	Assurance of governance and internal controls – Obtain assurance reports on internal controls	Existing	<ul style="list-style-type: none"> <li>None</li> </ul>	Internal Audit provide assurance annually around Fund Governance and management. LPPA also undertake their internal audit with ad-hoc oversight from an external auditor.	Review module with Internal Audit to ensure that the fund is adequately managing risk using internal controls.
TGB022	Continuity planning – develop, implement and maintain continuity plans so operations can be maintained in the event of disruption.	New	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>The fund has a service resilience plan which would become effective in the event of disruption.</p> <p>LPPA and LPPI have advised that they operate under their own business continuity plan in times of crisis and carry out regular disaster recovery tests.</p>	<ul style="list-style-type: none"> <li>Ensure regular reviews of LCPF continuity plans</li> <li>Ensure that we are content on continuity plans from LCPF perspective across all our providers such as LCC and LPP</li> </ul>
TGB039	Conflicts of interest – Managing conflicts of interests for public service pensions schemes.	Existing	<ul style="list-style-type: none"> <li>None</li> </ul>	The Register of Interests are reviewed on an annual basis and all Board Members advice on potential conflicts can be sought from Democratic Services officers at any time.	
TGB045	Own risk assessment	DNA	<ul style="list-style-type: none"> <li>None</li> </ul>		
TGB046	Scheme governance - Oversight and assurance of day to day operations of the scheme	New	<ul style="list-style-type: none"> <li>None</li> </ul>	The Pension Fund Committee, Local Pension Board and Investment Panel operate under a set of Terms of Reference. The Constitution also detailed delegations to Officers.	

				The Fund have a workplan for the Local Pension Board which is reviewed	
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#### Funding and Investment

Module Number	Module Title	New/Existing	Potential Gaps	Comments	Action
FAI001	Investment governance – Policies and procedures that ensure the governing body complies with any obligations it has in relation to investment	Existing	<ul style="list-style-type: none"> <li>Under Review</li> </ul>	Best Practice for LGPS schemes - DC arrangements refer to AVCs	Head of Fund to review full compliance of Module
FAI003	Investment decision-making	DNA	<ul style="list-style-type: none"> <li>None</li> </ul>		
FAI004	Implementation report	DNA	<ul style="list-style-type: none"> <li>None</li> </ul>		
FAI005	Investment monitoring – Managing investments with due skill, care and diligence.	New	<ul style="list-style-type: none"> <li>Under review</li> </ul>	Best Practice for LGPS schemes - DC arrangements refer to AVCs	Head of Fund to review level of compliance for module
FAI006	Stewardship	DNA	<ul style="list-style-type: none"> <li>None</li> </ul>		
FAI011	Climate change	DNA	<ul style="list-style-type: none"> <li>None</li> </ul>		
FAI008	Statement of investment principles	DNA	<ul style="list-style-type: none"> <li>None</li> </ul>		
FAI010	Default arrangements and charge restrictions	DNA	<ul style="list-style-type: none"> <li>None</li> </ul>		

#### Administration

Module Number	Module Title	New/Existing	Potential Gaps	Comments	Action
ADM001	Administration	New	<ul style="list-style-type: none"> <li>Record Keeping on Risk Register</li> </ul>	<p>The Pension Board and Pension Fund Committee receive quarterly updates on pensions administration activities. Administration is also a feature on the risk register.</p> <p>The Fund is currently working on a focussed admin service review which covers:</p> <ul style="list-style-type: none"> <li>SLAs</li> <li>Quality</li> <li>Cyber-security</li> </ul>	<p>Review final regulations by TPR and ensure requirements around record keeping on risk register are incorporated fully.</p> <p>Review module with/seek assurance on compliance from LPPA</p>

ADM002	Financial transactions – Core financial transactions as defined in legislation are processed promptly and accurately	New	<ul style="list-style-type: none"> <li>Annual review of processes and systems related to financial transactions with scope for improvement</li> <li>Investing contributions</li> </ul>	<p>This module relates to Governance and Processes and IT systems along with Investment of contributions. LPPA report regularly on administration performance which provides an overview of retirement benefits. LPPA work to Service Level Agreements. Regular communication between LPPA and employers to ensure flow of information and data is complete and accurate.</p>	<p>Review and seek assurance from LCPF finance and LPPA that processes, and systems are reviewed annually with a scope to improving them.</p> <p>Clarity needed on Investing Contributions and how detailed the requirements are for the LGPS. LCPF Finance to review this module.</p>
ADM014	Transfers – Ensuring appropriate checks are in place for transferring benefits to another pension scheme	New	<ul style="list-style-type: none"> <li>Process to notify tPR of transfer greater than £1.5m or if lower, 5% of scheme assets.</li> <li>Regular monitoring of impact of transfer on scheme funding</li> </ul>	<p>LPPA have a due diligence process to undertake to ensure that transfer that are requested is being paid to a legitimate arrangement.</p>	<p>Review final regulations to understand the depth of involvement required by the Governing Body regarding large transfer payments and regular monitoring.</p> <p>Obtain assurance from LPPA to confirm that their process is in line with requirements set out in the Single Code of Practice.</p>
ADM003	Scheme records – Maintain complete and accurate records	New	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>The Fund have a records retention policy 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>LPPA carry out a data cleaning schedule which specifies data cleaning activities during the year. The cleanliness of this data is compared to targets set out by the Pensions Regulator. LPPA is working on implementing electronic data quality reporting routines, covering employers' and scheme data quality.</p> <p>LPPA are undertaking an ongoing data cleanse activity. This will include working with employers to track down missing leaver forms.</p> <p>LPPA 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>LPPA carry out comparisons of active member data with employer payroll data occur each pay period. Reconciliations between pay and contributions are carried out on a monthly</p>	<p>Obtain assurance from LPPA to confirm that their process is in line with requirements set out in the Single Code of Practice.</p>

				<p>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> <p>Additionally, the Employer Guide sets out in some detail the Fund's specific data requirements.</p>	
ADM006	Data monitoring – maintaining data to ensure records are accurate and complete	New	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>LPPA actively work on ensuring that their records are accurate for the membership.</p> <p>LPPA are compliant with GDPR regulation through relevant training, processes and client reporting on a monthly.</p>	Obtain assurance from LPPA to confirm that their process is in line with requirements set out in the Single Code of Practice.
ADM015	Maintenance of IT systems – IT systems to be reviewed and maintained regularly	New	<ul style="list-style-type: none"> <li>Ensure Cyber Security measures and procedures are in place and functioning</li> </ul>		<ul style="list-style-type: none"> <li>Seek assurance from all service providers that they have robust security measures and procedures in place and are functioning. Additionally seek evidence of changes are planned and they have a policy for maintaining, upgrading and replacing software and hardware.</li> <li>Seek assurance from LPPA and other providers that systems are able to incorporate updates to overriding legislation.</li> </ul>
ADM016	Cyber controls – controls for the loss, disruption or data to a scheme or its members as a result failure in its IT systems and processes.	New	<ul style="list-style-type: none"> <li>Assessing cyber risk</li> <li>Managing cyber risk</li> </ul>		<ul style="list-style-type: none"> <li>The LCPF Governance Team are working to develop the requirements for this module <ul style="list-style-type: none"> <li>Understanding the requirements from a Fund perspective: <ul style="list-style-type: none"> <li>From an officer understanding</li> <li>Board and Committee perspective</li> <li>Workshop planned for July 2022 for Board and Committee</li> </ul> </li> <li>Review of the TPR requirements and understanding the areas which require development. To support this, we have the Aon Scorecard which we are working on</li> </ul> </li> </ul>

					obtaining. This will provide the ability for us to fully understand the areas which we need to develop further.
ADM007	Receiving contributions	Existing	<ul style="list-style-type: none"> <li>Treat any failure to make payment of employee contributions as materially significant.</li> </ul>	<p>Established processes are in place to manage employer and employee contributions due, and their payment. These are operated by the LCPF Finance Team.</p> <p>Most employer and employee contributions are received by the Fund via a regular direct debit collection.</p> <p>The LCPF Finance team have processes in place to identify missing contributions and to pursue is payments are missed.</p> <p>Contributions breaches and incidents are reported quarterly as part of the breaches report.</p>	LCPF Finance to fully review module from final regulations to ensure full compliance.
ADM008	Monitoring contributions – reconciliation of pension contributions	Existing	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>A reconciliation between the EPIC system, the Oracle financial system and the Altair pension payroll is performed on a monthly basis. The reconciliation ensures that the financial information is consistent across the systems for the employer and the members. 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>	Pensions Finance to fully review module from final regulations to ensure full compliance.
ADM011	Resolving overdue contributions – process for chasing payments once they become overdue	Existing	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>The Fund's policy is to collect contributions by direct debit. If a contribution remittance advice is not received from an employer via EPIC in line with the direct debit deadline then the Fund will collect an amount equal to the previous month. This maintains cash flow 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</p>	Pensions Finance to fully review module from final regulations to ensure full compliance.



				<p>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 in accordance with the Debt Management Policy.</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>	
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**Communications and Disclosure**

Module Number	Module Title	New/Existing	Potential Gaps	Comments	Actions
CAD001	General principles for member communications – expectations of how to meet the legal obligations	New	<ul style="list-style-type: none"> <li>Review communication methods to ensure that they are inclusive</li> </ul>	<p>LPPA review member communications on a regular basis and fine-tune communications in light of feedback from Local Pension Board. LPPA have an internal sign off process for all member communications to ensure both simplicity/ease of understanding and technical accuracy.</p> <p>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.</p> <p>The strategy for issuing of regulatory statements and documents online vs postal versions is reviewed annually. Any members who have opted out of electronic communications receive a paper copy.</p> <p>LPPA are undertaking a review of their member communications with a focus on plain English, less jargon and member transparency.</p>	<p>Assurance for LPPA that these requirements are met.</p> <p>Review LCPF website to ensure it is accessible for all users.</p>

CAD003	Statutory financial statements (DC)	DNA			
CAD011	Statutory financial statements (DB)	DNA			
CAD012	Statutory financial statements (PSPS) – Providing annual benefit statements to members	Existing	<ul style="list-style-type: none"> <li>None</li> </ul>	LPPA send out Annual benefit statements to all members in line with Regulations. Member data is updated on a monthly basis onto individual member records.	Seek assurance from LPPA annually that they meet these requirements including reviewing content supplied as part of the Annual benefit Statement to ensure it meets regulations.
CAD004	Retirement risk warnings and guidance	DNA			
CAD016	Short service refunds/refunds of contributions – Appropriate options to provide to members following leaving the scheme after a short period of service.	Existing	<ul style="list-style-type: none"> <li>None</li> </ul>	LPPA process refunds in line with LGPS regulations and provide members with appropriate documentation and options.	Seek assurance from LPPA that information is provided to members in a timely manner set out in the regulations.
CAD008	Chair's statement	DNA			
CAD005	Scams – Ensuring appropriate checks are undertaken to mitigate the risk of scams.	New	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>LPPA have a due diligence process to undertake to ensure that transfer that are requested is being paid to a legitimate arrangement.</p> <p>The Fund receives a monthly Audit, Risk and Compliance report which provides an update on claims received for members who have lost their pension to scammers.</p>	Obtain assurance from LPPA regarding their due diligence process
CAD010	Publishing information about public service pension schemes – Publishing details of the Pension Board	Existing	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>The LCPF Website has details of the member of the Local Pension Board and Pension Fund Committee.</p> <p>Both Committees have detailed Terms of Reference which are available on the County Council's Website.</p>	Ensure details LCPF on website is regularly reviewed and updated
CAD014	Audit requirements – an opinion from an independent Auditor of the Scheme on the audited accounts and statement on payment of contributions to the scheme	New	<ul style="list-style-type: none"> <li>Audit opinion to reference contributions.</li> <li>Review timing of when audit opinion is made available.</li> </ul>	<p>The audit opinion is quite extensive and is prepared under appropriate regulations.</p> <p>The accounts are published on the LCPF website and is freely available to the public.</p>	<ul style="list-style-type: none"> <li>LCPF Finance to review requirement</li> </ul>
CAD015	Dispute resolution procedures – Formal procedure and processes to investigate and decide upon pension scheme disputes.	Existing	<ul style="list-style-type: none"> <li>None</li> </ul>	Details of the Internal Dispute Resolution Procedure (IDRP) are published on the LPPAs website. 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. Those documents are reviewed regularly to ensure that they are in line with amending	

				<p>legislation and procedures. (The latest versions can be viewed at the link below)  <a href="https://www.lppapensions.co.uk/customer-care/internal-dispute-resolution-procedure/">https://www.lppapensions.co.uk/customer-care/internal-dispute-resolution-procedure/</a></p> <p>Procedures for employers are also contained within the employer guide on the LPPA website. In addition a guide for 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 IDRPs, 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 IDRPs 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 IDRPs is part of all LPPA 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> <p>LPPA provides an update on IDRPs case volume to the Fund periodically.</p>	
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#### Reporting to TPR

Module Number	Module Title	New/Existing	Potential Gaps	Comments	Actions
RTT001	Registrable information and scheme returns – Information about the fund to be published to the tPR.	New	<ul style="list-style-type: none"> <li>None</li> </ul>	LCPF are registered to the tPR website and details of the scheme is also provided to them and reviewed frequently.	

RTT003	Who must report – Who is required to report Breaches of law to the tPR	Existing	<ul style="list-style-type: none"> <li>• None</li> </ul>	<p>The Fund have a Breaches Policy in place.</p> <p>Training on Code of Practice 14 and GDPR has been given to all Board and Committee members. All others under a 'statutory duty' to report have also received the relevant training.</p> <p>Systems are now in place to record and report breaches for contributions, process and data;</p> <p>A Breaches Report is produced by the Fund (with input from LPPA and LCC Finance team) provided to the Local Pension Board every quarter.</p> <p>When and how breaches are reported to the Pension Regulator is documented within the procedures.</p>	
RTT004	Decision to report – Making a judgement on the decision to report a breach of law to tPR	Existing	<ul style="list-style-type: none"> <li>• None</li> </ul>	<p>Determining whether a there is a reasonable cause to believe there is a breach law which is of material significance is covered in the LCPF breaches policy.</p> <p>The Fund uses the tPR's traffic light framework to review breaches and identify if they require reporting.</p> <p>The framework covers the Cause, effect, reaction and wider implications of a breach.</p>	Review Breaches policy is in line with the final regulations published by tPR
RTT005	How to report – Process for reporting breaches to the tPR	Existing	<ul style="list-style-type: none"> <li>• None</li> </ul>	<p>Breaches Policy covers details to be provided as part of reporting a breach to the tPR. This policy also outlines steps on how to ascertain if a breach is of material significance.</p> <p>The Breaches are reported to the Local Pension Board on a regular basis by the Fund officers. The report covers contributions, CoP14 and data breaches.</p> <p>A Risk and Compliance report is provided by LPPA on a monthly basis which outlines any administration breach.</p> <p>This report is also shared with the County Councils Information Governance Manager.</p>	