

**Lancashire Local Pension Board**

Meeting to be held on Tuesday, 11 July 2023

Electoral Division affected:  
N/A;

**General Code of Practice Update**

Contact for further information:

Catherine Hunt, 01772 533757, Senior Governance Officer,  
catherine.hunt2@lancashire.gov.uk

**Brief Summary**

The Pensions Regulator has been working on a Code of Practice which has been referred to as the Single Code of Practice but will be formally known as the General Code of Practice when it is implemented.

The Code of Practice covers occupational, personal, and public service pension schemes and will provide guidance in relation to the exercise of the functions under relevant pensions legislation and set out standards of conduct and practice expected from those who exercise each function.

This report provides a progress update to the Local Pension Board regarding implementation of the new Code.

**Recommendation**

The Board is asked to consider and comment on the content of this report.

**Detail**

It is good practice to regularly review compliance with the Code of Practice and Fund Officers intended to provide the Local Pension Board with a compliance statement in respect of the new Code in July 2023.

The compliance report for the new Code was discussed in the October 2022 and January 2023 Board meetings where it was agreed to postpone compliance reporting until the final code was available.

Unfortunately, the new Code has not been laid before Parliament ahead of the summer recess, so it is now unlikely to become law before the autumn. Once it has been laid in Parliament, it is expected to become the new requirement for Public Service Pension Schemes following a 40-day period of laying in Parliament.



Fund Officers have already undertaken a gap analysis based on the draft Code to understand and identify the areas which will require attention once the final version of the General Code of Practice is published. This was presented to the Local Pension Board in [July 2022](#) (see item 8 on that agenda).

Fund Officers intend to start working through any gaps in respect of mandatory and high priority areas and plan to bring an initial compliance statement to the October 2023 Board meeting highlighting the areas of focus.

The Pension Regulator does not expect full compliance on day one but expects a working plan demonstrating commitment to compliance which will be an evolutionary target.

However, Fund officers have started work on a standalone project in respect of Cyber Security which is a high priority gap in terms of compliance with the Code of Practice.

The final version of the General Code of Practice is expected to clarify the roles and responsibilities of the Local Pension Board and Pension Fund Committee and arrangements have been made for the Pension Regulator to give a presentation on the subject to the Local Pension Board on 11th December 2023. This will further enhance understanding around the role of the governing body which in the draft Code was quite vague.

## Consultations

N/A

## Implications:

This item has the following implications, as indicated:

## Risk management

There are no significant risk management implications as the new Code has yet to be implemented. Failure to comply with current Code of Practice 14 could result in a fine and or reputational damage and this will be the case with certain requirements under the new Code.

## Local Government (Access to Information) Act 1985 List of Background Papers

Paper	Date	Contact/Tel
N/A		

Reason for inclusion in Part II, if appropriate  
N/A

