

The Pensions Regulator: Single Modular Code – Public Sector Form

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Response form 1: General questions about the new code

Module	Q no	Question	
Updates		We welcome any observations about a possible regular process for issuing updates to the new code. For example, should updates be annual, or at longer intervals? Please advise us of any concerns about regular updates. We would also be interested to hear about any topics that we should prioritise for inclusion in the new code.	We believe the decision to introduce a single code should be based the needs of the UK pensions industry and not on the ease of future updates for TPR. In particular, we do not believe the single code meets the needs of the LGPS which has a unique governance framework with layers of delegation.
Guidance		Which pieces of guidance, or topic areas, should be prioritised for updates following the introduction of the new code?	Whichever is more crucial.
Governing bodies		Do users understand the term “governing body”? Would another term work better?	<p>It should not be down to each LGPS Fund across the country to try to interpret and apply the code or guidance in the context of the LGPS, this will hinder Funds rather than help them. Funds need codes of practice and guidance that help introduce clarity and consistency, rather than risking ambiguity, confusion, and perceived scope creep.</p> <p>The attempt to have a coverall term (‘Governing Bodies’) is weak and does not work for the LGPS. The code needs to list and define each type of body (Board/manager/committee etc) the code applies to and each module (and parts of module as applicable) should then show which type of body it applies to. Trustees/Boards/Committees need guidance to understand what applies to them, it needs to be obvious and explicit.</p>

PSED		We would be interested to understand if there are any aspects of our expectation’s users think would discriminate against, disadvantage, or present an additional or exceptional challenge to anyone with a protected characteristic.	
		General comments about the new code of practice	<p>The draft code is poorly structured with some very confusing headings and sub-headings, for example:</p> <ul style="list-style-type: none"> • In the Governing body, Board structure and activities section, the introduction to the Role of the governing body module is rather vague and this is not a good start to the code. Also, the structure does not seem to make sense, jumping from the role of the governing body to recruitment then back to the role of the chair and the remuneration policy. Would a more sensible structure be: <ol style="list-style-type: none"> 1. Role of the governing body 2. Role of the chair 3. Meetings and decision-making 4. Recruiting to the governing body (including Member-nominated trustee appointments) 5. Remuneration policy • The Administration section has a main heading of “Administration” followed by a sub-heading of “Scheme administration” under which there is just one module titled “Administration”, so what is the point of the sub-heading? • The numbering of modules does not make sense and adds to the confusion; numbering should be sequential, not jump back and forth and we believe TPR should reconsider the letter prefixes as they are inconsistent and unnecessarily confusing. We would suggest a single letter, i.e. G = Governing Body, F = Funding & Investments, A = Administration, C = Communications and disclosure and R = Reporting to TPR. • Modules are littered with what we believe are unnecessary cross references/links to other parts and definitions and many of these are in bold and a different colour meaning the bits highlighted in a module are bits that aren’t actually part of that module. A scheme needs to be able to go through the code and easily identify the things they need to ensure they are doing and a better structure with better wording would remove the requirement for any cross-referencing etc.

Response form 2: The 'Governing body'

Module	Q no	Question	Response
Role of the governing body (TGB001)	ROQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	ROQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>Thirdly, we believe there are fundamental flaws with the structure of the draft code, headings, titles, and wording of the modules. For example:</p> <p>There is a main heading of 'Governing Body'</p> <p>Then another heading 'Board Structure and Activities'</p> <p>Then the module title 'The Role of the Governing Body'</p>
	ROQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.

	ROQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	ROQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>

	Q no	Question	Response
	REQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
Recruiting to the governing body (TGB014)	REQ 2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>Thirdly, we believe there are fundamental flaws with the structure of the draft code, headings, titles, and wording of the modules. For example:</p> <p>There is a main heading of 'Governing Body'</p> <p>Then another heading 'Board Structure and Activities'</p> <p>Then the module title 'Recruiting to the Governing Body'</p> <p>Within the LGPS there are differences in the recruitment to the Pensions Committee and Pensions Board when compared to the private sector. Within the LGPS the Pensions Committee is made up of elected Members which is controlled by local council elections. In addition, the Employer Representative recruitment to the Local Pensions Board is also derived from elected members in some cases. Therefore, this section is not relevant to the LGPS in its entirety and the code lacks distinction of the expectations and who they apply to.</p>

	REQ 3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	REQ 4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	REQ 5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>

Module	Q no	Question	Response
Role of the chair (TGB015)	RLQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	RLQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>This module does not make it clear who in the LGPS this is applicable to. For example, is this the role of the Pension Committee Chair or the Local Pensions Board Chair?</p>
	RLQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	<p>The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.</p> <p>The role of the Chair as describe in the code is good and is something we can build into the terms of reference for both our Pensions Committee and Local Pensions Board but we need clarification that this does apply to both in the first instance.</p>

	RLQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	RLQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>

Module	Q no	Question	Response
Meetings and decision-making (TGB006)	MTQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	MTQ 2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	No, the expectations are not clear. Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly. Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.
	MTQ 3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme. As the Pensions Committee within the LGPS are the decision-making body, we would expect this to only be applicable to that Committee. However, as it has not been made explicit in the code, are the other elements in regard to meetings (excluding the decision-making expectations) still relevant and apply to the Local Pensions Board? This module should be more explicit, and state exactly which expectation applies to which Committee/Board within the LGPS.

	MTQ 4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	MTQ 5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>

Module	Q no	Question	Response
Remuneration policy (TGB016)	RMQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	Best practice for LGPS agreed with DT we will not respond but we may want to review in slower time for the purposes of the PAB (and possibly the PSB Scheme Member rep).
	RMQ 2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	
	RMQ 3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	
	RMQ 4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	
	RMQ 5	Do you have any further comments on the module that have not been covered by the previous questions?	

Module	Q no	Question	Response
Working knowledge of pensions (TGB017)	WOQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	WOQ 2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>Thirdly, we believe there are fundamental flaws with the structure of the draft code, headings, titles, and wording of the modules. For example:</p> <p>There is a main heading of 'Governing Body'</p> <p>Then another heading 'Knowledge and Understanding'</p> <p>Then the module title 'Working knowledge of pensions'</p>
	WOQ 3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	<p>The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.</p> <p>Within Annex 1 on page 25, the top two bullets differentiate from private and public schemes. However, the third bullet then goes on to state "the Governing Body's powers and discretions". Clarity is required on which Governing Body this is referring to within the LGPS.</p> <p>The code has stipulated at the bottom of page 25 what is not applicable to the LGPS which is more helpful and should be consistently applied throughout the document.</p>

	WOQ 4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	WOQ 5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>
	WOQ6	The expectations in these modules are based on longstanding existing guidance. Do the expectations provide a new member of a governing body with sufficient knowledge and understanding to enable them to fulfil their role?	No as it is not clear which Governing Body and which role this applies to within the LGPS.

Module	Q no	Question	Response
Governance of knowledge and understanding (TGB005)	GOQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	Not applicable for LGPS agreed with DT we will not respond but we may want to review in slower time.
	GOQ 2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	
	GOQ 3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	
	GOQ 4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	
	GOQ 5	Do you have any further comments on the module that have not been covered by the previous questions?	
	GOQ6	The expectations in these modules are based on longstanding existing	

	guidance. Do the expectations provide a new member of a governing body with sufficient knowledge and understanding to enable them to fulfil their role?	
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Module	Q no	Question	Response
Building and maintaining knowledge (TGB003)	BUQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	BUQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>Although these expectations would sufficiently apply to both the Local Pensions Board and Pensions Committee within the LGPS, it is not clear if this is expected of the S151 Officer. Also, are there any other Responsible persons within the LGPS that this should apply to?</p> <p>This module is too vague as it stands for LGPS Funds to interpret and apply.</p> <p>In addition, this module has links referencing to other modules within the code for further information however the referenced modules do not apply to the LGPS.</p>
	BUQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.

	BUQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	BUQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>

Module	Q no	Question	Response
Managing advisers and service providers (TGB010)	MAQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	MAQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>Within the LGPS we utilise the LGPS National Frameworks and/or the Council's procurement procedures to procure advisers and service providers. Therefore, is this section applicable to the LGPS? If not, it should state this.</p> <p>In addition, its noted that the footnotes (and only the footnotes) are referring to Northern Ireland legislation which would imply this is only applicable to Northern Ireland schemes. Therefore, this module needs to be more explicit in regard to who this applies to.</p>
	MAQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.

	MAQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	MAQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>

Module	Q no	Question	Response
Identifying and assessing risks (TGB031)	IDQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	IDQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>It is also unclear whose responsibility within the LGPS this is. More clarity would be required to enable LGPS funds to apply this module.</p>
	IDQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	IDQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.

	IDQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>
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Module	Q no	Question	Response
Managing risk using internal controls (TGB032)	MNQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	MNQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>In particular, "The legal responsibility in relation to internal controls rests with the governing body" is not helpful when trying to apply this to the LGPS. Whose legal responsibility within the LGPS does this relate to?</p>
	MNQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	MNQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	MNQ5	Do you have any further comments on the module that have not been covered by the previous questions?	This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All

			<p>of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>
	MNQ6	The expectations set out apply differently to different schemes. Is this clear from the module, and are governing bodies provided with enough leeway to address the expectations in the most appropriate way for their scheme?	No. It is not possible from the information provided to decipher who is responsible for what within the LGPS.

Module	Q no	Question	Response
Assurance of governance and internal controls (TGB033)	ASQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	ASQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	No, the expectations are not clear. Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly. Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.
	ASQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	ASQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	ASQ5	Do you have any further comments on the module that have not been covered by the previous questions?	This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.

			If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.
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Module	Q no	Question	Response
Continuity planning (TGB022)	COQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	Best practice for LGPS agreed with DT we will not respond but we may want to review in slower time.
	COQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	
	COQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	
	COQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	
	COQ5	Do you have any further comments on the module that have not been covered by the previous questions?	

Module	Q no	Question	Response
Conflicts of interest (TGB039)	CNQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	CNQ 2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>As an LGPS fund we would be able to apply all expectations to the Pensions Committee, Local Pensions Board and Officers however we believe that this module needs to be more explicit to confirm that this is applicable to ALL in its entirety.</p>
	CNQ 3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.

	CNQ 4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	CNQ 5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>

Module	Q no	Question	Response
Own risk assessment (TGB045)	OWQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	Not applicable for LGPS agreed with DT we will not respond.
	OWQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	
	OWQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	
	OWQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	
	OWQ5	Do you have any further comments on the module that have not been covered by the previous questions?	
	OWQ6	Are there any improvements that we could make to our suggested ORA that would make it more valuable for governing bodies? Is the cycle suggested for the review and update of the ORA appropriate given the subjects that it covers?	

Module	Q no	Question	Response
Scheme governance (TGB046)	SCQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	SCQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>We believe there are fundamental flaws with the structure of the draft code, headings, titles, and wording of the modules. For example:</p> <p>There is a main heading of 'Governing Body'</p> <p>Then another heading 'Scheme Governance'</p> <p>Then the module title 'Scheme Governance'</p> <p>As an LGPS fund we would be able to apply all expectations to the Pensions Committee, Local Pensions Board and Officers however we believe that this module needs to be more explicit to confirm that this is applicable to ALL in its entirety.</p> <p>In particular "governing bodies of <u>certain</u> schemes must establish and operate an effective system of governance including internal controls". This module needs to be clear to which schemes this applies to and which expectations apply to each scheme thereafter.</p>
	SCQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.

		that would assist governing bodies in meeting our expectations?	
	SCQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	SCQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>
	SCQ6	Is it clear where all the features of an effective system of governance, are covered in code from the content of this module? If not, what needs to be clearer?	No. It is not clear what is expected of which scheme. This module needs to be more explicit to detail the requirements of the LGPS and who within the LGPS for this particular module is the 'governing body'.

Response form 3: 'Funding and investment'

Module	Q no	Question	Response
Investment governance (FAI001)	INQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	Best practice for LGPS agreed with DT we will not respond but we may want to review in slower time.
	INQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	
	INQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	
	INQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	
	INQ5	Do you have any further comments on the module that have not been covered by the previous questions?	

Module	Q no	Question	Response
Investment monitoring (FAI005)	IEQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	Best practice for LGPS agreed with DT we will not respond but we may want to review in slower time.
	IEQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	
	IEQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	
	IEQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	
	IEQ5	Do you have any further comments on the module that have not been covered by the previous questions?	

Module	Q no	Question	Response
Stewardship (FAI006)	STQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	Not applicable for LGPS agreed with DT we will not respond but we may want to review in slower time.
	STQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	
	STQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	
	STQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	
	STQ5	Do you have any further comments on the module that have not been covered by the previous questions?	

Module	Q no	Question	Response
Climate change (FAIO11)	CLQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	Not applicable for LGPS agreed with DT we will not respond but we may want to review in slower time.
	CLQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	
	CLQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	
	CLQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	
	CLQ5	Do you have any further comments on the module that have not been covered by the previous questions?	

Response form 4: 'Administration'

Module	Q no	Question	Response
Administration (ADM001)	ADQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	ADQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>Secondly, we believe there are fundamental flaws with the structure of the draft code, headings, titles, and wording of the modules. For example:</p> <p>There is a main heading of 'Administration'</p> <p>Then another heading 'Scheme Administration'</p> <p>Then the module title 'Administration'</p> <p>The module then proceeds to talk about the processing of multiple transactions, investing contributions, paying benefits and a breakdown in any transaction. It also states the legislation around maintaining records and internal controls. It is not clear what the intention of this module is nor what it is trying to introduce/summarise.</p>

		In addition, at the end of this introduction/summary (if that is what it is meant to be) it states “Every governing body should have <u>some</u> of the following measures in place, however “some” could mean one or all of them. Therefore, it is impossible to understand which measures are applicable to the LGPS.
ADQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
ADQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
ADQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren’t actually part of the module. All of this serves only to draw attention away from TPR’s expectations and schemes need to be able to clearly see and understand TPR’s expectations of them.</p> <p>We believe that the structure, headings, titles, and wording of the Administration modules are confusing. For example:</p> <p>There are 6 modules under the heading ‘Information handling’ but the order makes no sense. Wouldn’t the order work better as ‘Scheme records’, ‘Data monitoring’, ‘Maintenance of IT systems’ and ‘Cyber controls’? We are also not convinced that ‘Financial transactions’ and ‘Transfers’ belong under this heading.</p>

Module	Q no	Question	
Financial transactions (ADM002)	FIQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	FIQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	No, the expectations are not clear. It mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme. The second and third paragraphs on page 84 are exact repetitions of the second and third paragraphs on page 82 of the previous module (ADM001). As in our answer to ADQ2, it is not clear what the intention of this module is nor what it is trying to introduce/summarise.
	FIQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	FIQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	FIQ5	Do you have any further comments on the module that have not been covered by the previous questions?	This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a

		<p>different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>We believe that the structure, headings, titles, and wording of the Administration modules are confusing. For example:</p> <p>There are 6 modules under the heading 'Information handling' but the order makes no sense. Wouldn't the order work better as 'Scheme records', 'Data monitoring', 'Maintenance of IT systems' and 'Cyber controls'? We are also not convinced that 'Financial transactions' and 'Transfers' belong under this heading.</p>
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Module	Q no	Question	Response
Transfers (ADM014)	TRQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok, but it is not clear why this module on transfers appears under the “Information handling” heading.
	TRQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme’s own circumstances?	<p>No, the expectations are not clear.</p> <p>It is not clear what “Governing Body” means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR’s expectations regarding the LGPS are not defined clearly.</p> <p>The wording of this module is a mixture of vague statements and specific statements/expectations some of which do not have a clear purpose.</p> <p>We are concerned that the wording of this module has the potential to create confusion between this module, the scams module and the PSIG guidance and believe the “Transfers” and “Scams” modules should sit together under a “Transfers” subheading within the “Administration” main heading.</p>
	TRQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	As in TRQ2, the wording of this module is a mixture of vague statements and specific statements/expectations some of which do not have a clear purpose.

	TRQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	TRQ5	Do you have any further comments on the module that have not been covered by the previous questions?	We are concerned that the wording of this module has the potential to create confusion between this module, the scams module and the PSIG guidance and believe the “Transfers” and “Scams” modules should sit together under a “Transfers” subheading within the “Administration” main heading.

Module	Q no	Question	Response
Scheme records (ADM003)	SHQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	SHQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>It is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>For example, the expectations in this module include:</p> <ul style="list-style-type: none"> • Identify and rectify any errors in scheme records • Review and amend processes as necessary to prevent further errors • Record accurate investments and disinvestments • Accurately perform standard benefit calculations • Carry out reconciliations of data, transactions and investments held <p>The wording of these expectations implies that, for an LGPS Fund, the scheme manager and/or Local Pensions Board will be carrying out this work which is not the case. In the LGPS, the administrators would carry out such work.</p>
	SHQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.

		that would assist governing bodies in meeting our expectations?	
	SHQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	SHQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>On page 91 we have another repetition of the same two paragraphs used in ADM001 and ADM002 and again, the wording doesn't sufficiently explain the relevance of those paragraphs to this module.</p> <p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p> <p>The structure, headings, titles, and wording of the Administration modules are confused. For example: There are 6 modules under the heading 'Information handling' but the order makes no sense. Wouldn't the order work better as 'Scheme records', 'Data monitoring', 'Maintenance of IT systems' and 'Cyber controls'? We are also not convinced that 'Financial transactions' and 'Transfers' belong under this heading.</p> <p>In this module, all of the subheadings are repeated for expectations and for best practice, but no prominence is given to "expectations" and "best practice" so at first glance it looks odd to have repeated subheadings. It would be helpful if more consideration was given to the structure and formatting, so it was obvious to the reader on first glance what the expectations are and what is best practice.</p>

Module	Q no	Question	Response
Data monitoring (ADM006)	DAQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	DAQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	No, the expectations are not clear. Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly. Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.
	DAQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	DAQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.

	<p>DAQ5</p>	<p>Do you have any further comments on the module that have not been covered by the previous questions?</p>	<p>On page 91 we have yet another repetition of the same two paragraphs used in ADM001, ADM002 and ADM003 and again, the wording makes no attempt to explain the relevance of those paragraphs to this module.</p> <p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p> <p>The structure, headings, titles, and wording of the Administration modules are confused. For example:</p> <p>There are 6 modules under the heading 'Information handling' but the order makes no sense. Wouldn't the order work better as 'Scheme records', 'Data monitoring', 'Maintenance of IT systems' and 'Cyber controls'? We are also not convinced that 'Financial transactions' and 'Transfers' belong under this heading.</p>
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Module	Q no	Question	Response
Maintenance of IT systems (ADM015)	MIQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	No. We do not understand the logic in having separate modules for “Maintenance of IT systems” and “Cyber controls”, as these are heavily interdependent and should be contained within a single module.
	MIQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme’s own circumstances?	No, the expectations are not clear. It is not clear what “Governing Body” means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR’s expectations regarding the LGPS are not defined clearly. LGPS funds are part of their host authority and have no control over the networks and infrastructure they use. For the LGPS, this needs to be taken into account within this section as LGPS funds would not be able to apply all the expectations.
	MIQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	MIQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	MIQ5	Do you have any further comments on the module that have not been covered by the previous questions?	We do not understand the logic in having separate modules for “Maintenance of IT systems” and “Cyber controls”, as these are heavily interdependent and should be contained within a single module.

Module	Q no	Question	Response
Cyber controls (ADM016)	CYQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	No. We do not understand the logic in having separate modules for “Maintenance of IT systems” and “Cyber controls”, as these are heavily interdependent and should be contained within a single module.
	CYQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme’s own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what “Governing Body” means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR’s expectations regarding the LGPS are not defined clearly.</p> <p>LGPS funds are part of their host authority and have no control over the networks and infrastructure they use. For the LGPS, this needs to be taken into account within this section as LGPS funds would not be able to apply all the expectations.</p> <p>The final paragraph on page 100 is not clear whether the detail provided is best practice or expectations for public sector schemes. This module needs to be more explicit and state what is expected of the LGPS.</p>
	CYQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.

	CYQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	CYQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>We do not understand the logic in having separate modules for “Maintenance of IT systems” and “Cyber controls”, as these are heavily interdependent and should be contained within a single module.</p> <p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren’t actually part of the module. All of this serves only to draw attention away from TPR’s expectations and schemes need to be able to clearly see and understand TPR’s expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>

Module	Q no	Question	Response
	RCQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
Receiving contributions (ADM007)	RCQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>The draft module states:</p> <p>"Governing bodies are responsible for preparing and understanding the payment schedule, or direct payment arrangement, which details the contributions due to be paid. They must also put in place processes that facilitate the monitoring of contributions and transmission of payment information between the employer, member and scheme administrator." This paragraph is confusing due to governing bodies having no involvement in any contribution transactions or exchange of information between the employer and member. LGPS funds have no control over this and therefore issues are arising from the lack of clarity around who the "Governing Body" is in relation to the LGPS.</p> <p>"Be <u>confident</u> that other parties, including employers, third party payroll, administration systems, investment managers, and investment platform providers, have the capacity to transfer data and</p>

		<p>monies efficiently.” LGPS funds have no control over employers and third-party payroll. In addition, it is unclear how an LGPS fund would be able to evidence their <u>confidence</u> in this.</p> <p>“Have processes to enable members to demonstrate compliance with HMRC tax requirements, i.e. annual allowance”. A scheme is required to provide a pension saving statement if a member exceeds the annual allowance in the scheme, or on request, but whether or how a member demonstrates compliance with HMRC tax requirements is a personal taxation matter for them, not the scheme. In addition, it is not clear how this related to “Receiving contributions” or “Operational and risk management”.</p>
RCQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
RCQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
RCQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren’t actually part of the module. All of this serves only to draw attention away from TPR’s expectations and schemes need to be able to clearly see and understand TPR’s expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>

Module	Q no	Question	Response
Monitoring contributions (ADM008)	MOQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	MOQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	<p>No, the expectations are not clear.</p> <p>Firstly, it is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.</p> <p>Secondly, it mixes expectations for LGPS / public sector / private sector schemes but gives no indication as to which expectations apply to which type of scheme.</p> <p>Thirdly, this module has not clearly set out TPR's expectations. Although the expectations are within the text of the module, it is mixed within the background, commentary and numerous references and links.</p>
	MOQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.

	MOQ4	<p>Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?</p>	<p>We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.</p>
	MOQ5	<p>Do you have any further comments on the module that have not been covered by the previous questions?</p>	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p> <p>Some of the wording and expectations under "Recording employee and employer transactions" appear to be contradictory, for example:</p> <p>"As part of their general administration, employers should provide the information required by the governing body to monitor contributions at the same time they send them to the scheme" yet it also states "If the necessary payment information is not supplied, and the governing body needs it to carry out risk-based monitoring, they should request the information they need from the employer".</p> <p>We don't understand why the code is informing funds to ask the employer for the required information if they don't provide it as this is routine business as usual. Funds will always ask for the required information from employers.</p> <p>In regard to "and the governing body needs it to carry out risk-based monitoring" if funds didn't need the required information for monitoring purposes then we wouldn't have asked for it in the first place.</p>

	MOQ6	Are the timescales set out in this module appropriate with regards monitoring the payment of contributions?	No, we believe this module is unnecessarily prescriptive which could be counterproductive. This could be caused by time being spent on reporting a minor issue to TPR when that time could be better utilised liaising with the employer to obtain the missing information.
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Module	Q no	Question	Response
Resolving overdue contributions (ADMO11)	RSQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	No, we do not believe this title is a fair reflection on the content and feel that “Overdue payments” would work better.
	RSQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme’s own circumstances?	No, the expectations are not clear. It is not clear what “Governing Body” means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR’s expectations regarding the LGPS are not defined clearly.
	RSQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	RSQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	RSQ5	Do you have any further comments on the module that have not been covered by the previous questions?	This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren’t actually part of the module. All of this serves only to draw attention away from TPR’s expectations and schemes need to be able to clearly see and understand TPR’s expectations of them. If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.

Response form 5: 'Communications and disclosure'

Module	Q no	Question	Response
General principles for member communications (CAD001)	GEQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	GEQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	No, the expectations are not clear. It is not clear what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.
	GEQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme. In addition, TPR's expectations in regard to this module have been pushed onto the following page by the unnecessary references/links to other modules. We believe TPR's expectations should be front and centre on page 113. If, however, TPR believes the references/links should be retained, we believe they should be on the following page.
	GEQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.

	GEQ5	Do you have any further comments on the module that have not been covered by the previous questions?	The structure of the module needs to be reconsidered because TPR's expectations have been pushed onto the following page by some unnecessary references/links to other modules. We believe TPR's expectations should be front and centre on page 113. If, however, TPR believes the references/links should be retained, we believe they should be on the following page.
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Module	Q no	Question	Response
Statutory financial statements (PSPS) (CAD012)	SPS1Q1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	No, we believe the title is misleading and would be used more commonly in relation to a company or scheme's accounts etc. A more suitable title would be "Annual benefit statements" or "Member benefit statements".
	SPS1Q2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	The expectations are reasonably clear but would benefit further from the removal of highlighted references and links to previous modules and other guidance.
	SPS1Q3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	SPS1Q4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	No.
	SPS1Q5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>

Module	Q no	Question	Response
Short service refunds (CAD016)	SOQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	SOQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	In its current form, we do not believe there is much within this module that applies to the LGPS. Whilst the LGPS is subject to certain overriding legislation in this regard, these are contained in the LGPS Regulations and often strengthened, for example: <ul style="list-style-type: none"> • If a member opts out within 3 months of joining, their contributions are refunded through the payroll and it is not treated as a refund of contributions. • We cannot pay a refund to a member with less than 2 years membership, and who has not requested a refund, until the expiry of 5 years. • The LGPS is a statutory scheme and cannot be wound up.
	SOQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	SOQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	SOQ5	Do you have any further comments on the module that have not been covered by the previous questions?	This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All

		<p>of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>
	<p>SOQ6 This module refers to the underlying legislation extensively. Does it provide enough information on the legislative requirements and our expectations?</p>	<p>In its current form, we do not believe there is much use in this module applying to the LGPS because nothing contained in the module applies to the LGPS as currently drafted. Whilst the LGPS is subject to certain overriding legislation in this regard, these are contained in the LGPS Regulations and often strengthened, for example:</p> <ul style="list-style-type: none"> • If a member opts out within 3 months of joining, their contributions are refunded through the payroll and it is not treated as a refund of contributions. • We cannot pay a refund to a member with less than 2 years membership, and who has not requested a refund, until the expiry of 5 years. • The LGPS is a statutory scheme and cannot be wound up.

Module	Q no	Question	Response
Scams (CAD005)	SOQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	SOQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	The expectations are reasonably clear other than the ongoing issue around what "Governing Body" means for the LGPS with its unique and complex governance structure, and this fundamental problem means the TPR's expectations regarding the LGPS are not defined clearly.
	SOQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	SOQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	No.
	SOQ5	Do you have any further comments on the module that have not been covered by the previous questions?	This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.

			If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.
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Module	Q no	Question	Response
Publishing information about public service pension schemes (CAD010)	PUQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok, but we would question the requirement to have a separate module for a small subject matter. This may sit better under than Governing body section. Also see our comments under PUQ5 in regard to similar expectations not being made of private sector schemes.
	PUQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	Yes.
	PUQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	Yes.
	PUQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	No.
	PUQ5	Do you have any further comments on the module that have not been covered by the previous questions?	We are aware of the requirement, as a public sector scheme, to publish certain information under the Public Service Pensions Act 2013, but we feel TPR should have similar expectations/best practice guidance for private sector schemes. It seems perverse that these requirements / expectations exist for public sector schemes (whose members' benefits are a statutory entitlement and backed by the government) yet there are no such expectations / requirements for private sector schemes whose

			members' benefits are not so secure and do not have government backing. We would suggest that TPR consider placing similar expectations on private sector schemes.
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Module	Q no	Question	Response
Dispute resolution procedures (CAD015)	DIQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	DIQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	No, much of the wording and expectations are unclear and vague. For example, it says governing bodies must: <p>“provide their internal dispute resolution procedure to” – should this read “provide <u>details of / information about</u> their internal dispute resolution procedure to”?</p> <p>“provide their internal dispute resolution procedure to <u>prospective members</u>”. This requirement does not make sense. Surely only those in the scheme can complain about if they're not happy with the scheme.</p>
	DIQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	DIQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.

	DIQ5	Do you have any further comments on the module that have not been covered by the previous questions?	<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>
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Response form 6: 'Reporting to tPR'

Module	Q no	Question	Response
Registrable information and scheme returns (RTT001)	RGQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	RGQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	It is reasonably clear although, on the basis that a scheme is very unlikely to be referring to the code unless they had already registered, should the emphasis under "Registrable information" be on notifying TPR of any registrable information changes?
	RGQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	RGQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	RGQ5	Do you have any further comments on the module that have not been covered by the previous questions?	This module has a Glossary at the end defining five terms, none of which appear in the module which is not very clear to the reader.

			<p>This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>
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Module	Q no	Question	Response
Who must report (RTT003)	WHQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	WHQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	No. Under who must report it mentions all Members of the scheme and the Local Pensions Board but what about the Pensions Committee?
	WHQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	WHQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	WHQ5	Do you have any further comments on the module that have not been covered by the previous questions?	This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All

			<p>of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.</p> <p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>
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Module	Q no	Question	Response
Decision to report (RTT044)	DCQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	DCQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	This module is reasonably clear.
	DCQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	DCQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	DCQ5	Do you have any further comments on the module that have not been covered by the previous questions?	This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.

			<p>If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.</p>
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Module	Q no	Question	Response
How to report (RTT005)	HOQ1	Is the title of the module a fair reflection of the content provided within it? If not, what would be a clearer description of this content?	The title is ok.
	HOQ2	Is it clear from the module what our expectations are, and does this content provide governing bodies with a clear sense of how expectations may be applied to their scheme's own circumstances?	This module is reasonably clear.
	HOQ3	Has the subject matter of the module been covered in sufficient detail and is there any further information or guidance that would assist governing bodies in meeting our expectations?	The amount of detail within the module is acceptable, but the quality of the detail and how it is structured and worded provides a lack of clarity around which expectations apply to which types of scheme.
	HOQ4	Are there any expectations that may be considered a disproportionate and/or unreasonable burden for a well-run scheme, or for certain types of scheme or governing body?	We suspect there may be, but it is impossible to answer this question with any certainty because the expectations for LGPS funds are not clear.
	HOQ5	Do you have any further comments on the module that have not been covered by the previous questions?	This module, along with all the other modules, contains numerous cross-references, links, and definitions (glossary) which we believe are unnecessary. In addition, many of these are in bold and a different colour meaning the only bits highlighted in the module aren't actually part of the module. All of this serves only to draw attention away from TPR's expectations and schemes need to be able to clearly see and understand TPR's expectations of them.

			If the structure of the code was more considered, and related modules grouped together, there would be no need at all for any cross-referencing or links.
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