

## APPENDIX 2

### Compliance Action Plan – Pension Board (October 2020)

Compliance Area	Ref.	SAB Requirement	Compliance Level: April 2019	Recommendations	PB Actions	Due By Date	Direction of Travel	Additional Comments
Managing Risk and Internal Controls	E6	Is there a standing item on the Pension Board agenda to review scheme risks?	Non-compliant	1. The Board should consider risks at each meeting and the Fund should consider adding a standing agenda item to consider risk.	Agree to add as a standing item to the Board agenda.	N/A	↑	Complete – added as a standing item on the agenda going forward.
Scheme Advisory Board Guidance	K3	Once established, a Local Pension Board should adopt a knowledge and understanding policy and framework (possibly in conjunction with the Pensions Committee if appropriate).	Partially Compliant	1. The policy should ideally include the objectives of the policy. It is noted that there is a separate learning log but the policy does not specify how training will be recorded and monitored. 2. The policy is not dated or available on the Fund's website.	Per SAB guidance, agree on a designated person to take responsibility for ensuring the Board's policy and framework is developed and implemented. This could be a member of the Pension Board or an external person, for example an officer of the Administering Authority or a professional advisor.	Q1 2021	↔	Officers yet to update policy on behalf of Board.
Scheme Advisory Board Guidance	K4	A Local Pension Board should designate a person to take responsibility for ensuring that the Knowledge and Understanding Policy and Framework is developed and implemented.	Partially Compliant	1. Decide on designated person as outlined. 2. Ensure officers update the Knowledge and Understanding Policy to include the designated person.	As per K3. The policy should be observed alongside the Learning Needs Analyses to be undertaken by Board members.	Q1 2021	↔	Officers yet to update policy on behalf of Board.
Scheme Advisory Board Guidance	K6	A Local Pension Board should prepare (and keep updated) a list of the core documents recording	Non-compliant	1. Prepare list of core documents and make available to Board members.	Prepare a list of core documents outlining required frequency of review, last updates, and	Q2 2021	↔	Delegated to officers – no progress to date.

		policy about the administration of the Fund and make the list and documents (as well as the rules of the LGPS) accessible to its members.			responsibility for maintenance.			
Scheme Advisory Board Guidance	K10	A Local Pension Board should establish and maintain a register of interests for its members.	Non-compliant	1. Prepare and maintain a register of interests for Board members. SAB guidance stipulates "...register of interest should be circulated to the Local Pension Board for ongoing review [...] [I]t should be made available to the Administering Authority and it should be published (for example, on the Fund's website).	As per recommendation	N/A	↑	<b>Complete – added as a standing item on the agenda going forward.</b>
Scheme Advisory Board Guidance	K12	A Local Pension Board should understand the Administering Authority's requirements, controls, and policies for FOIA compliance so that the Board is aware of them and can comply with them.	Partially Compliant	1. The Board should be aware of requirements in this area.	Officers to prepare a paper explaining LA's FOI policy and compliance statistics.	Q2 2022	↔	Original date pushed back; no progress to date.