

**Appendix 1: The Pensions Regulator (TPR) General Code – Summary of gap analysis and assessment of status (Reviewed February 2024)**

*Green status = No tasks or only minor tasks needing to be completed to demonstrate compliance*

*Yellow status = Some tasks to undertake or complete, but that are already in progress and on track*

<b>The Governing Body</b>		
<b>Does this part apply to GMPF?</b>	<b>Name of Requirement</b>	<b>Status</b>
	<b>Board Structure and Activities</b>	
Yes	Role of the governing body	Green
Yes	Recruiting and appointment to the governing body	Green
No	Arrangement for member-nominated trustee appointments	N/A
Yes	Appointment and role of the chair	Green
Yes	Meetings and decision-making	Green
Unclear at present	Remuneration and fee policy	Green
	<b>Knowledge and Understanding Requirements</b>	
Yes	Knowledge and understanding	Green
Yes	Governance of knowledge and understanding	Green
	<b>Value for Scheme Members</b>	
No	Value for members (Defined Contribution)	N/A
	<b>Advisors and Service Providers</b>	
Yes	Managing advisers and service providers	Green
	<b>Risk Management</b>	
Yes	Identifying, evaluating, and recording risks	Green
Yes	Internal controls	Green
Yes	Assurance reports on internal controls	To be considered further
No – but best practice	Scheme Continuity planning	Green
Yes	Conflicts of interest	Green
No – but best practice	Own risk assessment	Green
No – but best practice	Risk management function	Green
	<b>Scheme Governance</b>	
Yes	Systems of governance	Green

Funding and Investment		
Does this part apply to GMPF?	Name of Requirement	Status
	<b>Investment</b>	
No – but best practice	Investment governance	Green
No – but best practice	Investment decision-making	Green
No – but best practice	Investment monitoring	Green
No – but best practice	Stewardship	Green
No – but best practice	Climate change	Green
No – but best practice	Statement of investment principles	Green
No	Default arrangements and charge restrictions (Defined Contribution)	N/A

Administration		
Does this part apply to GMPF?	Name of Requirement	Status
	<b>Scheme Administration</b>	
Yes	Planning and maintaining administration	Green
	<b>Information Handling</b>	
Yes	Financial transactions	Green
Yes	Transfers out	Green
Yes	Recordkeeping	Green
Yes	Data monitoring and improvement	Yellow
	<b>IT</b>	
Yes	Maintenance of IT systems	Green
Yes	Cyber controls	Green
	<b>Contributions</b>	
Yes	Receiving contributions	Green
Yes	Monitoring contributions	Green
Yes	Resolving overdue contributions	Green

Communication and Disclosure		
Does this part apply to GMPF?	Name of Requirement	Status
	<b>Information to Members</b>	
Yes	General principles for member communications	Green
No	Annual pension benefit statements (Defined Contribution)	N/A
No	Summary funding and pension benefit statements (Defined Benefit)	N/A
Yes	Statutory financial statements (Public Service Pension Schemes)	Green
No	Retirement risk warnings and guidance	N/A
No	Notification of right to cash transfer sum or contribution refund	N/A
No	Chair's Statement	N/A
Yes	Scams	Green
No	Audit Requirements	N/A
	<b>Public Information</b>	
Yes	Publishing scheme information (Public Service Pension Schemes)	Green
Yes	Dispute resolution procedures	Green

Reporting to TPR		
Does this part apply to GMPF?	Name of Requirement	Status
	<b>Regular Reports</b>	
Yes	Registrable information and scheme returns	Green
	<b>Whistleblowing – Reporting Breaches of the Law</b>	
Yes	Who must report	Green
Yes	Decision to report	Green
Yes	How to report	Green
Yes	Reporting payment failures	Green