TPR Schedule of Delegations 2026

Document Control

Policy Owner* (Directorate Name and Team)	Corporate Governance Team
Policy Editor Responsible Person's Job Title*	Corporate Governance Team
Policy Owner Accountable Person's Job Title*	Head of Corporate Governance
Consultation*	Finance, Legal, Governance
Informed*	All staff
Review Schedule	Annual
Last Approval date (Year/Month /Day - xxxx/xx/xx	
Next Review date (Year/Month /Day - xxxx/xx/xx)	
Version Number	v0.0

Version Control

Version	Reason for Change	Author (Full Name, Role Title)	Date (Year/Month/Day - xxxx/xx/xx)
V0.1	Legal and Finance review	Jacqueline Edwards, Emma Cranfield	
V1.0	Governance review	Rachel Gregson	2026/03/20

Contents

1. TPR Schedule of Delegations 2026 3

Part 1: The Overall Schedule of Delegations - how this Schedule works 3

P1: 1. Introduction 3

P1: 2. How functions are delegated 4

P1: 3. Principles - How to perform a delegated function 5

Part 2: Other requirements - when exercising a delegated function 6

P2: 1. Approving items for publication 6

P2: 2. The common seal 6

P2: 3. Authorising criminal prosecutions 8

P2: 4. Deputies 8

P2: 5. Interim appointments 8

P2: 6. Disclosure under sections 82 to 88 of the Pensions Act 2004 8

P2: 7. Examples of delegation principles 8

P2: 8. Additional Requirements 9

P2: 9. Reservations 9

Part 3: Officer Delegations – who can exercise delegated authority 10

General Delegation to Officers 10

The Regulatory Delegations to Officers 13

Schedule of Financial Delegations 22

1. Authority to delegate 22

2. Matters reserved to the Board: 23

3. Banking Transactions 23

Annex A - Delegation of Financial Authority to Executive Directors (and Head of Commercial where relevant) 24

TPR Schedule of Delegations 2026

The Schedule of Delegations – arrangement

This Schedule of Delegations comprises three parts and is arranged and made up as follows:

Part 1: Overall Schedule of Delegations – "how" this Schedule works and how to perform a delegated function

Part 2: Other requirements – "what" to consider and requirements to follow when exercising a delegated function

Part 3: Officer Delegations – "who" can exercise delegations and in what circumstances:

i) **Appendix A** – the General Delegations

i) **Appendix B** – the Regulatory Delegations

ii) **Appendix C** - the Financial Delegations, including **Annex A:** financial delegations from the CEO

Part 1: The Overall Schedule of Delegations - how this Schedule works

P1: 1. Introduction

The Role of the Board

1.1. Those persons appointed as members of TPR under the provisions of section 2(1) of the Pensions Act 2004 (hereafter referred to as the "TPR Board") collectively have statutory powers to act on behalf of TPR and can delegate some of their functions to the Determinations Panel (DP), TPR staff or third parties. Delegations are in accordance with Schedule 1, paragraphs 20 and 21 of the Pensions Act 2004 and the Pensions Regulator (Delegation of Powers) Regulations 2009.

1.2. Delegated functions are listed in the Schedule of Delegations, which the Board reviews and approves at least once a year.

1.4 The Board has authorised the Executive Committee (ExCo) to delegate all the functions in Appendix A, Appendix B and Appendix C except:

i) functions reserved to the DP

ii) functions which specifically require Board approval.

P1: 2. How functions are delegated

2.1. **Appendix A:** lists TPR's general delegations made to Executive Directors and Directors, to exercise TPR's functions which relate to their responsibilities, showing:

i) their areas of responsibility, and

ii) their incidental and ancillary powers, including to seek and obtain legal advice, and maintain privilege in that legal advice, for and on behalf of their "client group"

Appendix B: lists TPR's regulatory functions, showing:

i) which ones may or must be exercised by the DP

ii) which ones may be exercised by the relevant Executive Director, and subject to their further delegation to officers within their functional area

Appendix C: lists TPR's Financial Delegations and, in Annex A, CEO delegations

2.2. The level to which functions are delegated is based on:

i) the risk (to the statutory objectives[1] and to TPR) that exercising the function entails

ii) how taking action will affect the parties concerned

iii) TPR's risk appetite statement (Risk Appetite Statement)

2.3. Functions delegated to a role, whether inside or outside[2] TPR, can be exercised by the holders of that role and every role above it.

2.4. If, as a result of reorganisation or otherwise, a role is replaced or supported by a new role at the same level, functions delegated to the old role can immediately be performed by holders of the new role, and the Schedule of Delegations will be updated accordingly at the next Board review.

2.5 Where any officer listed in Appendix A is absent for any period, the Chief Executive or the relevant Executive Director may nominate in writing another officer to act in their place during their absence and shall make a record of all such nominations. Delegations may only be made to employees of the regulator or to secondees from other organisations. Annex C Delegations to secondees from other organisations

[1] In section 5 of the Pensions Act 2004
[2] Such as under the Pensions Regulator (Delegation of Powers) Regulations 2009 (SI 2009/1888)

require the agreement of the COO. Delegations to non-employees can only be made in certain circumstances and advice should be sought from TPR legal.

P1: 3. Principles - How to perform a delegated function

3.1. The Board requires any decision on the exercise of a delegated function to be made having regard to:

i) TPR's statutory objectives[3]

ii) TPR's Risk Appetite Statement

iii) the public law requirement to act lawfully, reasonably and fairly[4]

iv) the Better Regulation principles[5], which state that regulatory and enforcement activity must be transparent, accountable, proportionate and consistent, and used only where action is needed (this applies equally to non-regulatory functions)

v) where applicable, the duty[6] to consider the interests of all members of the scheme concerned, as well as the interests of the members directly affected by TPR's action

vi) the Public Sector Equality duty[7]

3.2. Staff performing a delegated function must:

i) act impartially and objectively in the public interest

ii) have the skills and experience to decide whether and how to act

iii) consider all relevant internal policies and take necessary advice (such as financial, legal or actuarial) before acting

iv) be at the most junior level appropriate, to make the best use of resources

3.3. All proposals to exercise a regulatory function in Appendix B must be peer-reviewed first and escalated if necessary. The decision-maker should record the peer review and any escalation, and the reason for the decision.

[3] In section 5 of the Pensions Act 2004

[4] There is a useful guide to decision-making for public bodies in this document issued by the Government Legal Department

[5] In section 21 of the Legislative and Regulatory Reform Act 2006

[6] In section 100 of the Pensions Act 2004

[7] In the Equality Act 2010, and government has issued guidance to help decision-makers in public authorities comply with the duty

Part 2: Other requirements - when exercising a delegated function

This part sets out what additional or other requirements and procedures should be followed when exercising delegated functions or which apply in certain circumstances.

P2: 1. Approving items for publication

1.1. Statutory powers and functions involving publication[8] are delegated to various levels at TPR, and supported by internal management controls:

i) Codes of Practice must be reviewed and approved by ExCo and the Board before consultation and before publication

ii) guidance associated with a Code must be approved by ExCo

iii) publications containing new or revised TPR policy (whether in the form of a statement or guidance) must be approved by ExCo

1.2. Where a publication is not already covered by an agreed process or a committee's terms of reference, each Executive Director will, according to their risk appetite, implement a procedure to ensure that anything to be published by their directorate is:

i) approved for publication at a level appropriate to the risk it presents

ii) notified in advance to the Chief Executive if appropriate

1.3. The Chairperson may require any item to be referred to the Board for approval before it is published.

P2: 2. The common seal

2.1. TPR has a common seal, which may be (but does not have to be) used when signing office leases and issuing determinations and decisions made by the DP and TPR staff.

2.2. The common seal shall also be used where a contract is required to be executed as a deed.

2.3. If the seal is used, it must be authenticated with the signature of an authorised signatory from the list below[9].

[8] Whether a publication in connection with the provision of information, advice or assistance under s12 PA04; a report in relation to consideration given to the exercise of regulatory functions under s89 PA04; a code of practice under s90 PA04 or policy statement or guidance

[9] Under paragraph 22(1) of Schedule 1 to the Pensions Act 2004

Authorised Signatory	Any matter	Clearance statements, directions and notices under the Employer Debt Regulations 2005	Determinations of the DP	Appointing trustees, unless reserved to the DP
Chairperson	Yes			
Chief Executive	Yes			
Chief Operating Officer	Yes			
Executive Directors Director of Master Trust and DC Supervision Director of Trusteeship, Administration and DB Supervision, Director of Enforcement Director of Compliance Director of Partnerships and Performance Senior Case Management Adviser		Yes		Yes
Head of Supervision in Market Oversight and Heads of Enforcement (Investigations and Proceedings respectively) in Regulatory Compliance		Yes		Yes
Specialists, Lead Specialists, Principals in Market Oversight and Regulatory Compliance		Yes		
Any member in DP Support team			Yes	
Lead Associate, Regulatory Transactions				Yes

P2: 3. Authorising criminal prosecutions

3.1 The Board delegates to the Director of Enforcement decisions on whether to initiate a criminal prosecution where TPR would prosecute.

3.2 Any such decision should be made only after taking legal advice, and in accordance with the two-stage test for Crown Prosecutors.

P2: 4. Deputies

4.1. A member of TPR staff who has a delegated function can authorise a deputy to exercise it on their behalf. Authorising a deputy must be in writing and requires the prior approval of:

i) the nominator's line manager, and

ii) if different, the relevant Director, and

4.2. Senior managers (ED, Director or Head) should nominate a deputy to act for them if they leave the office for a longer period, such as annual leave. Prior approval under paragraph 7.1 is not needed in these circumstances.

4.3. Deputies have the delegated powers associated with the nominator's role.

P2: 5. Interim appointments

5.1 A person appointed to a role on an interim basis can exercise all the functions delegated to that role. However, this does not apply to a contractor appointed on an interim basis, unless authorised by an Executive Director and, for Appendix C, the Chief Operating Officer.

P2: 6. Disclosure under sections 82 to 88 of the Pensions Act 2004

6.1 The powers in sections 82 to 88 of the Pensions Act 2004 (listed in Appendix B) must be exercised in accordance with agreed working procedures, protocols, statutory gateways and memoranda of understanding.

P2: 7. Examples of delegation principles

7.1. Business as usual

i) Decisions to proceed with draft codes of practice and send them to the Secretary of State for approval[10] are delegated to Executive Directors, because of the statutory importance of codes and the high reputational risk to TPR.

ii) Decisions on demanding information in a notice issued under section 72 PA04 or issuing a notice requiring attendance at interview under s72A PA04 are delegated to Specialists in Supervision and Enforcement, and

[10] Under section 91 of the Pensions Act 2004

Team Leaders in Compliance: they are significant decisions, with exposure to penalties for recipients in the event of non-compliance and post-holders should be aware of the issues and have access to legal advice to ensure that issuing the relevant notice is reasonable.

iii) Decisions on disclosing restricted information in certain circumstances[11] are delegated to a wide range of staff, and in all cases subject to relevant procedures, protocols, gateways and memoranda of understanding: this is a necessary part of many roles, and with legal advice it presents an acceptable risk to TPR.

P2: 8. Additional Requirements

The exercise of functions delegated to officers under this Schedule must comply with: -

8.1 any legal requirements or restrictions

8.2 any policy framework, any other plans and strategies approved by the Board

8.3 the Framework Agreement in place between DWP and TPR from time to time, in accordance with HM Treasury's handbook Managing Public Money[12] ("MPM")

8.4 the in-year budget as agreed under that Framework Agreement

8.5 TPR's Code of Conduct for staff; Information Management & Security policies Equality, Diversity & Inclusion strategy; and any other People Policies and guidance and procedures issued from time to time, including those relating to employment;

8.6 Financial Delegations in Appendix C, and CEO delegations from time to time in Annex A to that Appendix.

P2: 9. Reservations

For the avoidance of doubt, this Schedule does not delegate any function to an officer which:

9.1 is reserved to DWP, the Board or the Determinations Panel; or

9.2 may not by law be delegated to an officer; or

9.3 is an executive function which the CEO has reserved to themself or their appointed Deputy

[11] Sections 82 to 87 of the Pensions Act 2004
[12] Managing public money - GOV.UK

9.4 has the effect of changing or contravening policies or strategies approved by Board

Part 3: Officer Delegations – who can exercise delegated authority

P3: 1. Delegations to officers

1.1 The general responsibilities, functions and specific regulatory and other powers of TPR, which are set out in Appendix A – General Delegations, Appendix B – Regulatory Delegations, and Appendix C – Financial Delegations, to this Schedule of Delegation, are delegated to the corresponding officers listed in any such Appendix (or any successor post holder, in accordance with Part 1, paragraph 2.4; or temporary or replacement post holder nominated in accordance with Part 1, paragraph 2.5 of this Schedule) subject always to the requirements and limits of this Schedule of Delegation**.**

Schedule of Delegations - Part 3 - General Delegation to Officers

Appendix A

1. TPR's management structure is led by the Chief Executive, who has statutory responsibilities as Accounting Officer and as overall head of staff.

2. The post holders listed below (or any successor post holder subsequent to any reorganisation [see Part 1, paragraph 2.4], or any temporary replacement post holder nominated in accordance with the Schedule of Delegations [see Part 1, paragraph 2.5]), are **authorised** to exercise the functions of TPR relating to their areas of responsibility, which are summarised below, subject to any limitations set out in Appendix C: Financial Delegations, or as otherwise set out in the Schedule of Delegations.

3. In accordance with s.6 of the Pensions Act 2004, all actions/activities calculated to facilitate the exercise of TPR's functions, or incidental or conducive to their exercise and/or the performance of the TPR's functions or business needs are **authorised** to be done:

   (a) by the persons listed below within whose area of responsibility the action/activity lies, in accordance with this Appendix A, or

   (b) in the case of a particular function, by any member of staff, subject to any internal controls approved by the person to whom the function is delegated in accordance with Appendix B or

   (c) in the case of the Regulator's business needs, by any member of staff.

Legal Privilege & Client Group:

4. In line with the general delegations above, the Board provides authority that each Executive Director, or Director as appropriate, is owner of the Directorate or Service "client group"[13], for the purposes of seeking and obtaining (internal or external) legal advice, and for the purpose of asserting and maintaining privilege in such legal advice; and in any such case, can delegate the power to seek or obtain legal advice, and maintain privilege in that advice. to authorised officers within their Directorate, service, and area of responsibility.

Title of Postholder	Summary of area of responsibility
Chief Executive Officer (Accounting Officer)	Overall head of staff and responsible for the overall management of the workforce and service delivery within financial delegations and organisational budget envelope, and for achievement of statutory objectives and corporate priorities. In conjunction with the Chief Operating Officer and Executive General Counsel, responsible for ensuring probity and ethical conduct of TPR operations, in accordance with the Staff Code of Conduct and the Seven Principles of Public Life ('Nolan Principles').
Chief Operating Officer	Jointly responsible with the Chief Executive Officer and the Executive Directors for the overall performance of the paid service and for TPR's administration and financial, corporate and strategic asset management. Overall responsibility for Corporate Governance, Finance, Procurement & Commercial, Facilities, Human Resources, Risk, Internal Counter Fraud, Compliance and Assurance and change delivery and Programme Office, as well as business continuity planning. Deputises for the Chief Executive Officer when needed and responsible for reporting on TPR's Corporate Plans and Priorities. Responsible for ensuring coherent and accountable human resources, organisational design and organisational learning and development strategies for TPR and supporting others to manage their teams. Accountable for equality, diversity and inclusion, performance and reward, employee relations, as well as people operational planning, including recruitment and talent and succession planning

[13] This is to ensure that TPR meets the current requirements at law after the case of *Three Rivers District Council v Bank of England [2004] UKHL 48* which limits the "client group" for the purposes of legal professional privilege to those "persons who are authorised" to seek legal advice within an organisation.

	Responsible for management of data security, monitoring of compliance with data protection (DPO) and cyber assurance. In conjunction with the CEO and Executive General Counsel, responsible for ensuring probity and ethical conduct of TPR operations, in accordance with the Staff Code of Conduct and the Seven Principles of Public Life ('Nolan Principles').
Executive General Counsel, Enforcement & Legal Group	Chief legal adviser to the Executive Committee and Head of Profession for legal advisers. Responsible for oversight and management of the Legal Services team and the provision of legal advice and support to corporate, delivery and advisory teams. Accountable for conduct of litigation, for civil and criminal court proceedings (including tribunal matters, **whether or not arising from regulatory enforcement).** Jointly Responsible with COO and CEO for ensuring probity and ethical conduct of TPR operations.
Executive Director, Market Oversight	Responsible for oversight and management of regulatory engagements and related activity including supervision, compliance, regulatory transactions and customer support, as well as regulatory engagements and communications. Accountable for working collaboratively with the Enforcement function to ensure effective and efficient identification and referral of regulatory cases for enforcement activity
Executive Director, Strategy, Policy & Analysis	Responsible for working in collaboration with Executive Directors, teams and colleagues across TPR and with external partners and stakeholders to develop TPR's strategy in diverse policy areas to help shape thinking, recommendations, proposals and solutions. Responsible for strategic communications, policy, evidence & external risk based on data, insights and modelling, ESG & climate change, as well as Pensions Reform and connecting TPR policy with key stakeholders in HM Government, Parliament and other regulators, as well as the media.
Executive Director, Digital, Data and Technology	Responsible for ensuring a coherent and robust strategy for TPR's digital, data and technology systems and services; and for managing IT support services and related services and frameworks, such as cloud and cyber systems; digital architecture and design; data quality, engineering and master data management; as well as artificial intelligence and the Innovation Service
Director of Enforcement	Responsible for oversight, management and approval of funding of regulatory and criminal enforcement cases and

	for reporting to the Chief Executive on progress of criminal enforcement cases

Schedule of Delegations - Part 3 - The Regulatory Delegations to Officers

Appendix B

Overall delegation

[NB: See also the general delegations in Appendix A for the authority provided to Executive Directors and Directors to exercise the functions and powers (including activity incidental or ancillary to those functions and powers) in their area of responsibility]

1. The Regulatory Delegations in this Appendix B encompasses the 'regulatory functions':
    a. within the meaning of section 93(2) of the Pensions Act 2004 (PA04), including at section 93(2)(c), the 'reserved regulatory functions' (as listed at Schedule 2 of PA04), and such other functions as may be prescribed (under section 93(2)(q) PA04);
    b. which are subject to the "standard procedure", within the meaning of section 96 PA04; and (where indicated) may be subject to the 'Special Procedure' within the meaning of section 98 PA04.

2. Unless explicitly reserved or delegated to the Determinations Panel (DP), the Board delegates to the Executive Committee all regulatory functions in the Table included in the **Annex** [Table of Regulatory Functions] attached to this Appendix B, and to the relevant Executive Director or Director:

    a. for exercise of all authorisation, supervision and compliance related regulatory activity: the Executive Director [ED] of Market Oversight (MO)
    b. for exercise of all enforcement related regulatory activity: the Director [Dir] of Enforcement [ENF]; and
    c. to either of the Executive Director [ED] of Market Oversight (MO) and Director [Dir] of Enforcement [ENF], the ability to deputise for each other in relation to exercise of powers in connection with the regulatory activity undertaken in the corresponding Service area.

3. The level of delegations in this **Appendix B** also applies to the corresponding Northern Ireland legislation.

Additional information: Exercise of AE powers and information-gathering powers

4. In addition to the ‘regulatory functions’:
    a. Although not subject to the “standard procedure” within the meaning of the section 96 PA04, TPR’s auto-enrolment (AE) powers under the Pensions Act 2008 are also included in the Table of Regulatory functions.
    b. Authorisation of an information-gathering notice issued under s72 PA04, an interview notice under s72A PA04, or an inspection and authorisation to obtain a warrant (see sections 73-6, 78 PA04) is not defined in the legislation as ‘regulatory functions’, as these are ancillary powers exercised in connection with TPR’s functions and powers.
    c. Exercise will remain subject to policy and management controls and, for AE, these controls will be subject to oversight and approval by the relevant Executive Director [ED] of Market Oversight (MO) and/or Director [Dir] of Enforcement [ENF] for authorisation of a warrant (the controls for other departments will also remain with the relevant Executive Director [ED] of Market Oversight (MO) and/or Director [Dir] of Enforcement [ENF], given the nature of the power being exercised).

Annex: Table of Regulatory Functions:

The Table of Regulatory Functions in the Annex indicates in the columns ‘where power is delegated’, whether:

- Staff Determinations: indicates the Directorate, whose Executive Director, or Service Area whose Director, is authorised to decide whether to exercise the regulatory function or power in their area of responsibility (e.g. [ED] MO, [Dir] ENF). The ED may delegate further and/or may ask other staff to take the necessary administrative action to carry out the power or function.
- Reserved DP Only: 'Yes' indicates a function that is only exercisable by the Panel Determinations Panel, for ‘reserved regulatory’ functions (i.e. those reserved to be exercised by the Panel, only)
- Delegable to DP: 'Yes' indicates that the Regulator can choose to delegate the function to the Determinations Panel. Note that in addition to the functions listed, the Regulator may under s10(8) PA04 authorise the Determinations Panel, in such circumstances as the Regulator may determine, to exercise on its behalf such other functions (other than those listed in para 20(2)(a) to (c) of Schedule 1 to PA04) as it considers necessary for the effective exercise by the Panel of the functions set out at para 20(6)(a) to (c) of Schedule 1 to PA04.
- Special Procedure: indicates whether exercise of the function / power may be subject to the ‘Special Procedure’ within the meaning of section 98 PA04.

The Table below lists:

- **The "Regulatory Functions" as defined by section 93(2) of the Pensions Act 2004 (PA04), exercise of which is subject to the 'Standard Procedure' within the meaning of section 96 PA04; and (where indicated) may be subject to the 'Special Procedure' within the meaning of section 98 PA04.**
- **The Staff Delegation refers to the Executive Director [ED], of Market Oversight (MO); or the Director [Dir], of Enforcement (ENF)**

NOTE: The exercise of all other functions and powers which are not "regulatory functions" is governed by the General Delegation to Officers contained in Appendix A; and for Financial matters, exercise is governed by Appendix C to the Schedule of Delegation

REGULATORY FUNCTIONS						
Regulatory Function "status": source ref.	**Description**	**Legislation**	**Reserved to Determinations Panel (DP)?**	**Staff Delegation: MO [ED] / ENF [Dir]?**	**Can it be delegated to DP?**	**Can it be subject to the Special Procedure [s.98 PA04]?**
Regulatory Functions – the Pensions Act 1995 (PA95)						
PA04 s.93(2)(n)	Power to make an order under appointing a trustee (to extent it does not fall within paragraph (c))	**section 7** PA95	No	MO [ED] / ENF [Dir]	Yes	No
PA04 s.93(2)(o)	Power to make an order appointing an independent trustee	**section 23** PA95	No	MO [ED] / ENF [Dir]	Yes	Yes
PA04 s.93(2)(p)	Power to give directions facilitating winding up	**section 72B** PA95	No	MO [ED] / ENF [Dir]	Yes	No
Regulatory Functions – the Welfare Reform and Pensions Act 1999 (WRPA99)						
PA04 s.93(2)(m)	Power by direction to refuse to register a scheme under **section 2 WRPA99**	**section 2(3)(a)** WRPA99	No	MO [ED] / ENF [Dir]	Yes	No
Regulatory Functions – the Pensions Act 2004 (PA04)						
PA04 s.93(2)(a)	Power to issue an improvement notice	**section 13** PA04	No	MO [ED] / ENF [Dir]	Yes	No
PA04 s.93(2)(b)	Power to issue a third-party notice	**section 14** PA04	No	MO [ED] / ENF [Dir]	Yes	No
PA04 s.93(2) (ba)	Power to appoint a skilled person in relation to a public service pension scheme	**section 14A** PA04	No	MO [ED] / ENF [Dir]	No	No
PA04 s.93(2)(d)	Power to issue a clearance statement	**section 42** PA04	No	MO [ED] / ENF [Dir]	Yes	No
PA04 s.93(2)(e)	Power to approve details of arrangements for financial support (FSD)	**section 45(1)** PA04	No	MO [ED] / ENF [Dir]	Yes	No
PA04 s.93(2)(f)	Power to issue a clearance statement	**section 46** PA04	No	MO [ED] / ENF [Dir]	Yes	No
PA04 s.93(2)(g)	Power to vary or revoke a determination, notice, order, or direction	**section 101** PA04	No	MO [ED] / ENF [Dir] (to extent, when issued, it did not fall within reserved regulatory functions)	N/A	Yes
PA04 s.93(2) (h)	Power to make an order directing wind up after assessment period	**section 154(8)** PA04	No	MO [ED] / ENF [Dir]	Yes	No
PA04 s.93(2)(i)	Power to make an order to directing a person to take steps in relation to wind up	**section 219(4)** PA04	No	MO [ED] / ENF [Dir]	Yes	No
Automatic-enrolment functions – the Pensions Act 2008 (PA08)						
PA04 s.93(2)(q)	Power to issue a compliance notice	**section 35** PA08	No	MO [ED] / ENF [Dir]		No
PA 04 s.93(2)(q)	Power to issue a third-party compliance notice	**section 36** PA08	No	MO [ED] / ENF [Dir]		No
PA04 s.93(2)(q)	Power to issue an unpaid contributions notice	**section 37** PA08	No	MO [ED] / ENF [Dir]		No
PA04 s.93(2)(q)	Power to issue a fixed penalty notice.	**section 40** PA08	No	MO [ED] / ENF [Dir]		No

Regulatory Function "status": source ref.	Description	Legislation	Reserved to Determinations Panel (DP)?	Staff Delegation: MO [ED] / ENF [Dir]?	Can it be delegated to DP?	Can it be subject to the Special Procedure [s.98 PA04]?
PA04 s.93(2)(q)	Power to issue an escalating penalty notice.	section 41 PA08	No	MO [ED] / ENF [Dir]		No
PA04 s.93(2)(q)	Power to recover a penalty notice under section 40 or 41.	section 42 PA08	No	MO [ED] / ENF [Dir]		No
PA04 s.93(2)(q)	Power to review and vary, revoke or substitute a notice.	section 43 PA08	No	MO [ED] / ENF [Dir]		No
PA04 s.93(2)(q)	Power to bring a criminal prosecution for wilfully failing to comply with automatic enrolment duties.	section 45 PA08	No	MO [ED] / ENF [Dir]		No
Regulatory functions – the Pension Schemes Act 2017						
PA04 s.93(2)(pa)	Power to give a direction to submit implementation strategy (Master Trust scheme)	section 26(7) PSA17	No	MO [ED] / ENF [Dir]	No	No
Regulatory functions – the Pension Schemes Act 2021						
PA04 s.93(2)(pb)	Power to give a direction to obtain actuarial valuation or take other steps to remedy or mitigate failure (CDC scheme)	section 23(2) PSA21	No	MO [ED] / ENF [Dir]	Yes	No
PA04 s.93(2)(pc)	Power to give a risk notice to trustees (CDC scheme)	section 29(1) or (4) PSA21	No	MO [ED] / ENF [Dir]	Yes	No
PA04 s.93(2)(pd)	Power to give a direction to trustees to implement proposals in a resolution plan (CDC scheme)	section 29(6) PSA21	No	MO [ED] / ENF [Dir]	Yes	No
PA04 s.93(2)(pe)	Power to give a direction to trustees to submit implementation strategy (CDC scheme)	section 39(4) PSA21	No	MO [ED] / ENF [Dir]	Yes	No
RESERVED REGULATORY FUNCTIONS – SCHEDULE 2 OF THE PENSIONS ACT 2004						
PA04 s.93(2)(c)	**The reserved regulatory functions** [nb: each as individually listed below]	Schedule 2 PA04	Yes	/	N/A	/
Part 1 – Reserved Regulatory Functions under the Pension Schemes Act 1993						
PA04, Sch 2, Part 1, para 1	Direction to grant extension of period in which trustees or managers have to carry out certain duties	section 99(4) PSA93	Yes	N/A	N/A	No
PA04, Sch 2, Part 1, para 2	Direction to grant extension of time for compliance with Transfer Notice	section 101J(2) PSA93 (see also reg 26 of SI 2000/105)	Yes	N/A	N/A	No
PA04, Sch 2, Part 1, para 3	Power to impose penalty under Regulations made by virtue of s168(4), PSA93	section 168(4) PSA93	Yes	N/A	N/A	No
PA04, Sch 2, Part 1, para 3A	Powers to secure compliance with conditions of conversion of GMP (declare amendment, modification or adjustment void; prohibit steps; impose penalty)	section 24H PSA93 [inserted by s.14(6) PA07	Yes	N/A	N/A	Yes
Part 2 – Reserved Regulatory Functions under the Pensions Act 1995						
PA04, Sch 2, Part 2, para 4	Power to make an order prohibiting a person from being a trustee.	section 3(1) PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 5	Power to revoke an order prohibiting a person from being a trustee.	section 3(3) PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 5A	Power to give a notice waiving a prohibition.	section 3A(3) PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 6	Power to make an order suspending a trustee.	section 4(1) PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 7	Power to make an order extending period under section 4(1) PA95, suspending a trustee	section 4(2) PA95	Yes	N/A	N/A	No
PA04, Sch 2, Part 2, para 8	Power to revoke an order under section 4(1) PA95, suspending a trustee	section 4(5), PA95	Yes	N/A	N/A	Yes

Regulatory Function "status": source ref.	Description	Legislation	Reserved to Determinations Panel (DP)?	Staff Delegation: MO [ED] / ENF [Dir]?	Can it be delegated to DP?	Can it be subject to the Special Procedure [s.98 PA04]?
PA04, Sch 2, Part 2, para 9	Power to make an order appointing a trustee where a trustee is removed by (a) section 3 (prohibition) or by section 3A (automatic prohibition) or (b) section 7(3)(a) , (c) or (d) (competence /capability; secure assets; protect members' interests)	section 7(1) PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 10	Power by order, to exercise the same jurisdiction and powers as the High Court / Court of Session to vest property in, or transfer property to, trustees in consequence of the appointment or removal of a trustee.	section 9 PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 11	Power to require a person to pay a penalty for relevant act or omission	section 10 PA95 (including by virtue of section 10(3) contravention of regulations which provides section 10 PA95 penalty)	Yes	N/A	N/A	No
PA04, Sch 2, Part 2, para 12	Power to make an order directing or authorising wind up of a scheme	section 11 PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 13	Power to give direction to trustees to make payment to members for any failure to comply with requirement included in regulations by virtue of section 49(5) PA95	section 15 PA95	Yes	N/A	N/A	No
	Power to make an order appointing an independent trustee (insolvent employer)	section 23 PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 13A	Removal of a person from independent trustee register for not satisfying, or no longer satisfying, any prescribed condition	section 23(4) PA95, and regulations	Yes	N/A	N/A	No
PA04, Sch 2, Part 2, para 14	Power to give notice waiving trustee disqualification	section 29(5) PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 15	Power by order to exercise the same jurisdiction and powers as the High Court / Court of Session to vest property in, or transfer property to, the trustees where a trustee becomes disqualified under section 29 PA95	section 30(2) PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 15B	Power to extend or further extend the period referred to in section 58(6) PA95 in relation to a schedule of contributions	section 58(7) PA95	Yes	N/A	N/A	No
PA04, Sch 2, Part 2, para 15B	Power to extend or further extend the period applicable under section 60(3) PA95 in relation to securing an increase in the value of scheme assets	section 60(7) PA95	Yes	N/A	N/A	
PA04, Sch 2, Part 2, para 16	Power to make an order by which any modification of or grant of rights under a scheme is void to any extent	section 67G(2) PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 17	Power to make an order prohibiting, or specifying steps to be taken in relation to, the exercise of a power to modify a scheme	section 67H(2) PA95	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 2, para 18	Power to make an order under authorising the modification of a scheme or modifying the scheme	section 69 PA95	Yes	N/A	N/A	No
PA04, Sch 2, Part 2, para 19	Power to make an order modifying a scheme to ensuring it is properly wound up.	section 71A PA95	Yes	N/A	N/A	No
Part 3 – Reserved Regulatory Functions under the Welfare Reform and Pensions Act 1999						

Regulatory Function "status": source ref.	Description	Legislation	Reserved to Determinations Panel (DP)?	Staff Delegation: MO [ED] / ENF [Dir]?	Can it be delegated to DP?	Can it be subject to the Special Procedure [s.98 PA04]?
PA04, Sch 2, Part 3, para 20	Power by direction to remove a scheme from the register of stakeholder pension schemes.	section 2(3)(b), WRPA99	Yes	N/A	N/A	No
Part 4 - Reserved Regulatory Functions under the Pensions Act 2004						
PA04, Sch 2, Part 3, para 21	The power to make or extend a restraining order	section 20 PA04	Yes	N/A	N/A	Yes
PA04, Sch 2, Part 3, para 22	The power to make an order permitting payments out of an account that is subject to a restraining order	section 20(10) PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 23	The power to make a repatriation order	section 21 PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 24	The power to make a freezing order	section 23 PA04	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 25	The power to make an order extending the period for which a freezing order has effect	section 25(3) PA04	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 26	The power to make an order validating action taken in contravention of a freezing order.	section 26 PA04	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 27	The power to make an order directing that specified steps are taken in event of wind-up order is made during period of freezing order	section 28 PA04	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 28	The power to make an order giving a direction where a freezing order ceases to have effect	section 30 PA04	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 29	The power to make an order directing the notification of members.	section 31(3) PA04	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 30	The power to issue a contribution notice	section 38 PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 30A	The power to issue a direction to any person	section 39A(6) PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 31	The power to issue a direction to the trustees or managers to not take steps to recover debt due under s75 PA95	section 41(4) PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 32	The power to issue a revised contribution notice	section 41(9) PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 33	The power to issue a financial support direction	section 43 PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 33A	The power to issue a direction to any person to secure financial support is put in place	section 43A(3) PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 34	The power to issue a contribution notice	section 47 PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 35	The power to issue a direction to the trustees or managers to not take steps to recover debt due under s75 PA95	section 50(4) PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 36	The power to issue a revised contribution notice	section 50(9) PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 37	The power to make a restoration order	section 52 PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 38	The power to issue a contribution notice	section 55 PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 39	The power to issue a notice requiring trustees or managers, employer, pension board or any person involved in administration of a scheme to provide to the	section 71 PA04	Yes	No	N/A	No

Regulatory Function "status": source ref.	Description	Legislation	Reserved to Determinations Panel (DP)?	Staff Delegation: MO [ED] / ENF [Dir]?	Can it be delegated to DP?	Can it be subject to the Special Procedure [s.98 PA04]?
	Regulator a report (by skilled person) on specified matters					
PA04, Sch 2, Part 3, para 40	The power to make a direction extending the retention period for documents taken into possession under section 75 (inspection of premises)	section 76(8) PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 41	The power to make a direction extending the retention period for documents taken into possession under section 78 (warrant for entry and search of premises)	section 78(10) PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 41A	The power to require a person to pay a penalty (up to £1m subject to Regulations	section 88A PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 42	The power to make an order under section 231 modifying a scheme, giving directions or imposing a schedule of contributions.	section 231 PA04	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 43	Power to issue a ring-fencing notice	section 292 PA04	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 44	The power to vary or revoke (a) a determination made by the Determinations Panel whether to exercise a function listed in PA04, Schedule 2, or (b) an order, notice or direction made, issued or given in the exercise of one of those functions— (i) by the Panel, or (ii) by the Regulator in compliance with a tribunal direction under section 103 PA04	section 101 PA04	Yes	Yes (where original exercise of power of regulatory function was a staff delegation)	Yes	Yes (except power to revoke an order under section 3(3) PA95; and power to revoke an order under section 4(5) PA95)
Part 4A - Functions Under the Pension Schemes Act 2017						
PA04, Sch 2, Part 3, para 44A	The power to withdraw authorisation (Master Trust scheme)	section 19 PSA17	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 44B	The power to give a direction to pursue continuity option (Master Trust scheme)	section 28(4) PSA17	Yes	No	N/A	No
PA04, Sch 2, Part 3, para 44C	The power to make a pause order (Master Trust scheme)	section 31 PSA17	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 44D	The power to make an order under extending the period for which a pause order has effect (Master Trust scheme)	paragraph 2(2) of Schedule 1 PSA17	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 44E	The power to make an order under validating action taken in contravention of a pause order (Master Trust scheme)	paragraph 3 of Schedule 1 PSA17	Yes	No	N/A	Yes
PA04, Sch 2, Part 3, para 44F	The power to make an order directing the notification of members or employers (Master Trust scheme)	paragraph 4(3) of Schedule 1 PSA17	Yes	No	N/A	Yes
Pensions Act 2004: Part 4B - Functions Under Part 1 of the Pension Schemes Act 2021						
PA04, Sch 2, Part 4B, para 44H	The power to give a direction to obtain actuarial valuation or take other steps to remedy or mitigate failure (CDC scheme)	section 23(2) PSA21	Yes	No	N/A	No
PA04, Sch 2, Part 4B, para 44I	The power to give a direction to implement proposals in a resolution plan (CDC scheme)	section 29(6), PSA21	Yes	No	N/A	No
PA04, Sch 2, Part 4B, para 44J	Power to withdraw authorisation of a collective money purchase scheme (CDC scheme)	section 30, PSA21	Yes	No	N/A	Yes

Regulatory Function "status": source ref.	Description	Legislation	Reserved to Determinations Panel (DP)?	Staff Delegation: MO [ED] / ENF [Dir]?	Can it be delegated to DP?	Can it be subject to the Special Procedure [s.98 PA04]?
PA04, Sch 2, Part 4B, para 44K	Power to give a direction to pursue a continuity option (CDC scheme)	section 41(4), PSA21	Yes	No	N/A	No
PA04, Sch 2, Part 4B, para 44L	Power to make a pause order (CDC scheme)	section 44, PS21	Yes	No	N/A	Yes
PA04, Sch 2, Part 4B, para 44M	Power to make an order under extending the period for which a pause order has effect (CDC scheme)	paragraph 2(2) of Schedule 2, PSA21	Yes	No	N/A	Yes
PA04, Sch 2, Part 4B, para 44N	Power to make an order under validating action taken in contravention of a pause order (CDC scheme)	paragraph 3 of Schedule 2, PSA21	Yes	No	N/A	Yes
PA04, Sch 2, Part 4B, para 44O	Power to make an order under directing the notification of members or employers of a pause order (CDC scheme)	paragraph 4(3) of Schedule 2, PSA21	Yes	No	N/A	Yes
Pensions Act 2004: Schedule 2 - Part 5, Other Functions						
PA04, Sch 2, Part 5, para 45	Power to make an order to waive or relax any of the requirements of regulations 6 to 16 of the Occupational and Personal Pension Schemes (Consultation by Employers and Miscellaneous Amendment) Regulations 2006	regulation 19 of the Occupational and Personal Pension Schemes (Consultation by Employers and Miscellaneous Amendment) Regulations 2006	Yes	No	N/A	No
Pensions Act 2004 - Section 95(2)(b): Third Party Applications which are subject to the Standard Procedure:						
PA04, s.10(6)(a)	Application to permit payments out of an account that is subject to a restraining order	section 20(10) PA04	Yes	No	N/A	
PA04, s.10(6)(b)	Application for order validating action taken in contravention of freezing order	section 26(2) PA04	Yes	No	N/A	Yes
PA04, s.10(6)(c)	Application for the issue of a revised contribution notice under section 41(9)	section 41(7) PA04	Yes	No	N/A	No
PA04, s.10(6)(d)	Application for the issue of a revised contribution notice under section 50(9)	section 50(7) PA04	Yes	No	N/A	No
PA04, s.10(6)(d)	Application for revocation of prohibition order	section 3(3) PA95	Yes	No	N/A	Yes
PA04, s.10(6)(ea)	Application for waiver of prohibition	section 3A(3) PA95	Yes	No	N/A	Yes
PA04, s.10(6)(f)	Application for revocation of a suspension order	section 4(5) PA95	Yes	No	N/A	Yes
PA04, s.10(6)(g)	Application for appointment of a trustee under section 7(3)(a) or (c) PA95	section 7(5A) PA95	Yes	No	N/A	Yes
PA04, s.10(6)(h)	Application for waiver of disqualification	section 29(5) PA95	Yes	No	N/A	Yes
PA04, s.10(6)(ha)	Power to extend or further extend the period referred to in section 58(6) PA95 in relation to a schedule of contributions	section 58(7) PA95	Yes	No	N/A	No
PA04, s.10(6)(hb)	Power to extend or further extend the period applicable under section 60(3) PA95 in relation to securing an increase in value	section 60(7) PA95	Yes	No	N/A	No
PA04, s.10(6)(i)	Application for order authorising modification or modifying a scheme;	section 69(1) PA95	Yes	No	N/A	No
PA04, s.10(6)(j)	Application for modifying a scheme to secure winding up	section 71A(2) PA95	Yes	No	N/A	No

Regulatory Function "status": source ref.	Description	Legislation	Reserved to Determinations Panel (DP)?	Staff Delegation: MO [ED] / ENF [Dir]?	Can it be delegated to DP?	Can it be subject to the Special Procedure [s.98 PA04]?
PA04, s.10(6)(k)	Application for extension of a period for compliance with a member exercising CETV option	**section 99(4A)** PSA93	Yes	No	N/A	No
PA04, s.10(6)(l)	Application for extension of a period for compliance with a Transfer notice	**section 101J(6)(a)** PSA93	Yes	No	N/A	No

Schedule of Delegations - Part 3 - Schedule of Financial Delegations

Appendix C

1. Authority to delegate

1.1 The Board is responsible for approving TPR's annual budget and overseeing efficient and effective spending.

1.2 TPR's management structure is led by the Chief Executive Officer (CEO) who is appointed as Accounting Officer by the Permanent Secretary of the Department for Work and Pensions (DWP). As Accounting Officer (AO), they are personally responsible for safeguarding the public funds for which they have charge; for ensuring propriety, regularity, value for money and feasibility in the handling of those public funds; and for the day-to-day operations and management of TPR. In addition, they should ensure that TPR is run based on the standards, in terms of governance, decision-making and fiscal management, that are set out in Box 3.1 of Managing Public Money. These responsibilities are set in the AO appointment letter issued by the Principal Accounting Officer (PAO) of DWP. They are supported by the COO, who discharges the functions of the 'Finance Director' as set out in Managing Public Money.

1.3 This schedule sets out the financial matters delegated to the Chief Executive as Accounting Officer, and those matters that are reserved to the board.

1.4 With the exception of matters reserved to the Board, the Board delegates all financial matters, including the authorisation of spend and the purchase of assets, to the CEO as Accounting Officer (or in her absence the COO). The CEO is authorised to further delegate spend to TPR staff. Where the CEO delegates authority, including the authority to further sub-delegate, such delegations will be in writing. Authority to delegate spending approval to a contractor must be approved by either the CEO or Chief Operating Officer (COO) (or the Chair if the CEO or the COO are not available), and the relevant Executive Director. Any and all such delegations must be copied to the TPR finance team, who will hold the approval as a formal record.

1.5 TPR receives an annual delegation letter from DWP, which includes a number of matters which require the approval of some or all of the DWP, Cabinet Office or HM Treasury. Where these controls are in place, approval must be sought from those bodies before commitments are made. Full details are available on Commercial pages on Atlas (the TPR intranet) or from the Commercial team.

2. Matters reserved to the Board:

2.1 The following matters are reserved to the Board:

- The approval of the corporate plan and associated budgets
- The approval of all contracts above £10m
- The approval of all project spend above £10m on a 'whole life cost' basis, below this level, project spend will be approved by ExCo. However, this is further sub-delegated to the Business Change Committee up to this level.
- Pre-approval of cumulative levy case working above £1m

2.2 If items need urgent approval by the Board, the CEO (or in her absence the COO) or Chair may provisionally approve the costs after consulting the Executive Director responsible for strategic decisions on that case. The formal approval request must be presented to the Board at its next meeting and costs for which a spending commitment has been incurred pursuant to the provisional approval and prior to a decision by the Board shall be approved in any event.

3. Banking Transactions

3.1 TPR has a bank mandate with HSBC for seven accounts, comprising five operational and two non-operational accounts. The non-operational accounts are used for sweeping/deposit purposes to maximise interest returns.

3.2 The incumbents in the following roles are eligible to be authorised signatories on the bank mandate:

- CEO
- COO
- Director of Finance
- Head of Finance
- Principal Finance Business Partner
- Principal Financial Accountant
- Debt Recovery Lead

Changes to this list must be approved by the Executive Committee or TPR Board.

3.3 Signatories on the mandate have access to authorise the addition or deletion of users, accounts and transactions. The list of authorised signatories must be in accordance with the list of job roles above and authorised by the COO, Director of Finance or Head of Finance.

3.4 TPR uses two separate platforms for processing payments, the Bottomline PTX and the HSBC payment software. Payment authorisers currently include members of the bank mandate, Financial Accountant and Technical Debt Recovery Senior. Any additions or removal to the list of staff authorised to process payments on these two platforms must be approved by the Director of Finance or Head of Finance.

3.5 Daily transaction limits on the operational accounts are:

- BACS: £7,500,000
- CHAPS: £15,000,000

Changes to these limits must be authorised by the Director of Finance, COO or CEO.

3.6 Payments are made by bank transfer (BACS/CHAPs) wherever possible. If necessary, a cheque can be issued. The signatories on the bank mandate are authorised to sign cheques as follows:

- Up to £5,000: one signatory
- Up to £100,000: two signatories

3.7 Payments of salaries to staff must be approved by one senior member of the Finance Team before the BACS submission. This includes the COO, Director of Finance, the Head of Finance, Principal Finance Business Partner and Debt Recovery Lead.

Annex A - Delegation of Financial Authority to Executive Directors (and Head of Commercial where relevant)

This annex sets out the delegated financial authorities from the Chief Executive Officer to Executive Directors and also the Head of Commercial. It outlines responsibilities, spending limits, sub-delegation rules, commercial requirements and compliance with Government Spend Controls.

1. Responsibilities

1.1. The Chief Executive Officer, as the Accounting Officer, is responsible for ensuring that TPR has appropriate financial controls in place. This annex outlines the financial authorities delegated by the Chief Executive Officer to TPR's Executive Directors (and Head of Commercial where relevant). Specifically, it covers:

- The financial responsibilities and spending limits delegated to Executive Directors, and the Director of Enforcement
- The scope of Executive Directors' authority to sub-delegate
- General spending controls

- Approval thresholds for specific categories of activity

1.2. The delegation to the Executive Directors to approve expenditure does not remove the responsibility on the Chief Executive Office as Accounting Officer. Executive Directors should ensure, where practicable, that no member of staff undertakes or authorises a transaction for which they do not have authority. Activity must be planned to make allowance for the time required to obtain the necessary approvals.

1.3. This schedule explains how staff can approve spending and banking transactions. All amounts in this schedule include VAT.

1.4. The Finance Team maintains audit records of delegations granted.

2. Authority to spend, or approve spending commitments, has been delegated as follows:

Role	Delegated spending limit
Chair	£10m
CEO	£10m
Executive Directors with CEO endorsement	£10m
Chief Operating Officer (COO)	£1m
Executive Directors with COO endorsement	£1m
Executive Directors	£500,000

Below the above levels, Executive Directors may sub-delegate the approval of spending commitments or the approval of [cumulative] spend as follows within their respective directorates:

Role	Delegated spending limit
Director level	£500,000
Head of level	£350,000
Other staff members	£50,000

3. Spending on regulatory and other cases

3.1 Spending on case work (both legal and non-legal spend) must be pre-approved up to a cumulative overall limit for each case. The Chief Executive Officer has the authority to approve cumulative case spend up to £1m, below this level cumulative spend must be approved as outlined in the below tables.

Role	Cumulative case cost spend limit (legal or non-legal spend)
Executive Directors (regulatory cases - levy)	£750,000
Chief Operating Officer (any other cases)	£750,000

The Chief Executive delegates to the Director of Enforcement authority to approve cumulative regulatory case spend and to further sub-delegate as follows:

Role	Cumulative case cost spend limit (legal or non-legal spend)
Director of Enforcement	£500,000
Business Lead/Head of Enforcement	£350,000
Other appropriate members of the Enforcement Team	£50,000

3.2 Subsequent cost commitments on a case can then be approved using the financial delegations set out within the P2P approval levels (section 4 below) up to the overall pre-approved limit.

3.3 AE case spending is usually low, so the approval process follows the normal route described in section 4 below.

4. Approval of payments on Purchase to Pay (P2P)

4.1 For the approval of payments on P2P, the Commercial team is authorised to approve purchase orders on behalf of the budget holder. Budget holders must pre-approve spend as part of the spend controls/commercial process as outlined above in section 2.

4.2 For the approval of all spend in P2P:

TPR Board minuted[1] decision[14]	Unlimited

[14] Approved within the P2P system by Head of Commercial or Head of Finance with approved Board minutes attached.

4.3 For the approval of all spend in P2P, excluding contingent labour and legal spend exempt from procurement legislation (e.g. barrister costs/legal advice in contemplation of judicial or dispute resolution proceedings):

Delegated from the CEO (for the purpose of approval of payments on P2P subject to budget holder approval) to:	
Head of Commercial[15]	Up to £10m
Delegated from Head of Commercial to:	
Commercial Leads	Between £1m and £5m
Commercial Business Partners	Between £50,000 and £1m
Commercial Business Partners on behalf of budget holders [16]	Up to £50,000

Delegated from the Executive Directors to:	
Managers and advisors	Up to £50,000

4.4 For the approval of contingent labour spend and legal/non legal spend exempt from procurement legislation (e.g. barrister costs), you are authorised to approve expenditure on P2P in line with your delegated limit. You may sub delegate authority to approve expenditure on P2P to staff in your cost centre.

Role	**Limits on P2P**
CEO	£10m
COO	£1,000,000
Executive Directors	£500,000
Directors	£500,000
Named heads of business units	£350,000
Managers and advisors	Up to £50,000

5. Government Spend Controls

5.1. The Government restricts spending on certain categories, or requires government or CEO approval, using Spend Controls issued by the Cabinet Office.

[15] Head of Commercial (in absence, Finance Director or Chief Operating Officer) to allow the authorisation of purchase orders on P2P if documentation to confirm agreement to expenditure from budget holder is in order.

[16] Priority of approval sits with the manager/advisor within the business, should they be unavailable and approval is business critical, a member of The Commercial Team who holds a higher delegation may approve on their behalf.

5.2. These are separate from (and often below) TPR's own limits and must also be complied with carefully. You can get full details on (the TPR intranet) or from the Commercial team.

5.3. If a Spend Control applies, your proposal must be approved (internally or externally) before you commit costs. Approvals are captured through the commercial or recruitment approval processes.

5.4. We have additional governance built into the requisition and commercial process to ensure adherence to these controls before the approval of financial delegations, to show that we are using our delegated authority properly in line with our priorities. DWP monitors TPR's spending through regular reporting, including visibility of our contracts database.

6. Commercial

6.1. To ensure full compliance with UK legislation, and government mandated processes TPR's Commercial Process must be followed. All contracts and subsequent change controls are subject to budget holder approval as part of the spend control/commercial process.

6.2. Officers exercising delegated authority to authorise or sign contracts (and commissioning teams) must consult the Commercial Pages on Atlas for full details about commercial framework agreements, single tenders, and urgency rules.

6.3. All authorisation and signing of contracts (including non-disclosure agreements and other commercial documents) and executing deeds using the corporate seal must conform to their maximum delegated limits.

6.4. Those authorising or signing contracts or executing deeds must check that funds are available and that suitable contract terms have been agreed with the supplier.

6.5. Those delegated to authorise, or sign contracts are as follows:

Commercial Leads	Up to £5m (inclusive)
Head of Commercial	Up to £10m (inclusive)
CEO (or the COO in the CEO's absence)	Greater than £10m

7. Procurement challenges

7.1. In the event of a threat of or actual procurement challenge[17] a decision under this paragraph 6, to authorise or sign a contract, will only be made in

[17] Under the UK PCRs/Procurement Act 2023, suppliers who believe a contracting authority (such as TPR) has breached the PCRs/Procurement Act can seek remedies (including setting aside decision, damages, and/or ineffectiveness/set aside of contract) through legal action. This adjustment to the delegations covers both the threat of a claim as well as an actual claim, in light of the potential financial implications

consultation with the CEO, Accounting Officer or with COO as their authorised deputy, and [after taking/acting on] advice from Executive General Counsel.

8. Payroll budget and posts

8.1 Any new posts created will need to be evaluated to ensure grading is appropriate and must have approval from the relevant Director and budget holder in addition to sign off by the Finance Business Partner. Existing posts that become vacant due to resignation can be filled without the need for evaluation of the role.