

Good Governance review actions

Appendix 1

Recommendation	MHCLG	Other bodies	Scheme Advisory Board (SAB) dependent actions	SAB immediate actions	WPF position	WPF Actions	Notes
A.1 MHCLG will produce statutory guidance to establish new governance requirements for funds to effectively implement the proposals below. ("the Guidance").	Publish statutory guidance (SG) to include requirements set out below using either reg 2(3A) powers or a new regulation in section 3						
A.2 Each administering authority must have a single named officer who is responsible for the delivery of all LGPS related activity for that fund ("the LGPS senior officer").	Set requirement in scheme regulations	CIPFA to refer to the role in their guides	Publish a guide to the named officer role	Letter to CIPFA confirming SAB's recommendation to Minister	Section 151 is the Director of Resources. The Assistant Director has immediate responsibility for the Fund	Review when regulations amended, and guidance issued by SAB	It is not anticipated there will be a major change to WCC's position
A.3 Each administering authority must publish an annual	Set requirement in Scheme regulations		Publish a guide to GCS, including best			Wait for regulations and guidance	This is currently published as part of the

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governance compliance statement (GCS) that sets out how they comply with the governance requirements for LGPS funds, as per statutory Guidance. This statement must be co-signed by the LGPS senior officer and S151.	and publish high level statutory guidance		practice examples			to be published.	Fund's annual report.
B.1 Each fund must produce and publish a conflicts of interest policy which includes details of how actual, potential, and perceived conflicts are addressed within the governance of the fund, with specific reference to key conflicts identified in the Guidance.	Set requirements in statutory guidance at A.1		Publish a guide to Conflict of Interest (Col) policies, including best practice examples	Survey Administering Authorities (AAs) to identify extent of conflict-of-interest policies already in existence	Col already exist	Review when Statutory guidance issued	A Conflicts of Interest policy and statement of pecuniary interest are already a requirement for the Local Pension Board. It may be that this requirement is extended to cover the pension fund committees

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							which are only covered by Conflicts of Interest for councillors.
B.2 The Guidance should refer all those involved in the management of the LGPS, and in particular those on decision making committees, to the guide on statutory and fiduciary duty which will be produced by the SAB	Request that MHCLG clarify Fiduciary Duty in statutory guidance at A.1	CIPFA to make reference in their Knowledge and Understanding framework	Publish guide on statutory and fiduciary duty based on A.1 guidance and further legal advice	Seek further legal advice in co-ordination with Administering Authorities and recommend further action in this area		Provide necessary training when SAB guide and statutory guidance issued	Training currently provided to all Committee members
C.1 Each fund must produce and publish a policy on the representation of scheme members and non-administering authority employers on its committees, explaining its approach to voting rights for each	Set requirement in statutory guidance at A.1		Publish a guide to representation based on requirements of statutory guidance	Survey AAs for analysis of current representation	No official representation although a county councillor may also be a district councillor	Wait for statutory guidance and address Respond to survey when issued	Will need to wait and see what the Statutory Guidance requires. This may be an area where employers and scheme members are given

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party.							additional voting rights in the management of the Fund.
D.1 Introduce a requirement via the Guidance for key individuals within the LGPS, including LGPS officers and pensions committees, to have the appropriate level of knowledge and understanding to carry out their duties effectively.	Set requirement in statutory guidance at A.1	CIPFA to make reference in their Knowledge and Understanding framework	Publish a guide to relevant training including suppliers	Investigate existing training in this area and publish results	NKA assessment undertaken, and areas of training identified	Wait for statutory guidance to be published	The Fund has expanded the training provided to members of the pension committees and local pension board. Senior officers with responsibility for the day-to-day management of the Fund are included.
D.2 Introduce a requirement for s151 officers to carry out LGPS relevant training as part of CPD requirements to ensure good levels	Set requirement in statutory guidance at A.1	CIPFA to make reference in their Knowledge and Understanding framework	Publish a guide to relevant training including suppliers		Section 151 did not take part in NKA (?) or identified for part of training plan	Wait for statutory guidance to be published	See above. Although this only covers the Deputy Director of Finance who has delegated

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of knowledge and understanding.							responsibility for the Fund.
D.3 Administering authorities must publish a policy setting out their approach to the delivery, assessment and recording of training plans to meet these requirements.	Set requirement in statutory guidance at A.1		Publish a guide to training plans	Survey AAs for existing training plans and publish for best practice	Training plan in place	Undertaking the creation of a training log Take part in survey when published Review when SG published	The Fund has expanded its training requirements and all elected members, board members and senior officers with responsibility for the management of the Fund have access to a learning portal. Training received must be logged. An annual NKA is undertaken to help assess training needs. The training policy is

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							reviewed annually.
D.4 CIPFA should be asked to produce appropriate guidance and training modules for s151 officers.		CIPFA to produce appropriate guidance and training		Letter to CIPFA setting out request		Wait for guidance to be published	Deputy Director of Finance is included in all training sessions.
E.1 Each administering authority must document key roles and responsibilities relating to the LGPS and publish a roles and responsibilities matrix setting out how key decisions are reached. The matrix should reflect the host authority's scheme of delegation and constitution, and be consistent with role descriptions and business	Set requirement in statutory guidance at A.1		Publish a guide to Roles and Responsibilities Matrix	Survey and publish existing delegation arrangements in Administering Authorities		Wait for guidance and review	Currently all decisions are made by either the Staff and Pensions or by way of delegated responsibility to Pension Fund Investment Sub-Committee. This may be reviewed depending on the guidance issued.

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processes.							
E.2 Each administering authority must publish an administration strategy.	Set requirement in scheme regulations		Publish a guide to administration strategy	Obtain and publish examples of existing PSAs	Administration Strategy in place and reviewed	Review when regulations and guidance issued	Administration Strategy is published and reviewed annually
E.3 Each administering authority must report the fund's performance against an agreed set of indicators designed to measure standards of service	Set requirement in scheme regulations or statutory guidance	CIPFA to include in AR&A guidance			Fund has published service standards and monitors and reports against them to the Board and Committee	Review when regulations and or guidance issued.	Fund has published service standards and monitors and reports against them to the Board and Committee
E.4 Each administering authority must ensure their committee is included in the business planning process. Both the committee and LGPS senior officer must be satisfied with the resource	Set requirement in statutory guidance at A.1	CIPFA to publish appropriate guidance		Investigate and publish current arrangements for agreeing pension budget	Business plan shared with committees	Await further guidance and review	The Annual Report is reported to the Pension Fund Investment Sub-Committee (for approval) and the Local Pension Board (for comment). Parts of the

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and budget allocated to deliver the LGPS service over the next financial year.							report are reported throughout the year to PFISC and the LPB. This may need expanding depending on the Statutory Guidance issued.
<p>F.1 Each administering authority must undergo a biennial Independent Governance Review and, if applicable, produce the required improvement plan to address any issues identified. IGR reports to be assessed by a SAB panel of experts.</p>	Set requirement in scheme regulations, and include in high level statutory guidance		Establish panel of experts to review biennial governance reviews	Investigate the work of any similar bodies and consider potential structure and membership	Governance review undertaken and action plan created and progressed to completion	Consideration has already been given to this Review when regulations and SG issued	The Fund undertook an independent review in 2019 and made significant changes in its approach to governance and administration as a consequence of this report. It is anticipated that a further independent review will be

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							undertaken. The Fund is currently waiting for regulations and statutory guidance.
F.2 LGA to consider establishing a peer review process for LGPS Funds.		LGA to consider proposal		Letter to LGA setting out request		Wait for further information on this	Waiting for further information on this

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