

Division(s): n/a

PENSION FUND COMMITTEE – 6 JUNE 2025

GOVERNANCE & COMMUNICATIONS POLICY REVIEWS

Report by the Executive Director of Resources & Section 151 Officer

RECOMMENDATION

1. The Committee is **RECOMMENDED** to:
 - i) Approve the revised **Communications Policy**.
 - ii) Approve the revised **Governance Policy**.
 - iii) Approve the revised **Governance Compliance Statement**.
 - iv) Approve the revised **Breaches Policy**.

Communications Policy

2. Regulation 61 of the Local Government Pension Scheme Regulations 2013 sets out the administering authority's policy requirements concerning communications with members and Scheme employers. Specifically, it states that 'an administering authority must prepare, maintain and publish a written statement setting out its policy concerning communications with members, representatives of members, prospective members and Scheme employers.'
3. Furthermore, the policy must set out the following:
 - i) the provision of information and publicity about the Scheme to members, representatives of members and Scheme employers; and
 - ii) the format, frequency and method of distributing such information or publicity; and
 - iii) the promotion of the Scheme to prospective members and their employers.
4. The fund Communications Policy was last reviewed in June 2024. The revised Communications Policy can be found at **APPENDIX 1**. It has a couple of changes:
 - i) Paragraph 15, item d) added: MSS document upload now available.
 - ii) Paragraph 19 added: LinkedIn page to be set up for fund in the next 12 months.

Governance Policy & Governance Compliance Statement

5. Under regulation 55 of the LGPS Regulations 2013, all Funds within the Local Government Pension Scheme (LGPS) in England and Wales are required to publish a Governance Compliance Statement.
6. The regulations prescribe the content of the Governance Compliance Statement and Governance Policy which must also be included in the annual report. The Compliance Statement and Policy should outline the overall governance structures and arrangements in place including:
 - the respective roles and responsibilities of the pensions or investments committee, local pensions board and any related sub-committees or advisory panels;
 - membership of each panel, board, committee or sub-committee with details of each member's voting rights, record of attendance at meetings and details of training received;
 - how the CIPFA Knowledge and Skills Framework, and other training requirements, (e.g. for MIFID II and The Pensions Regulator) have been applied;
 - how oversight and governance of the regional asset pool takes place;
 - other key elements of the governance structure (e.g. key officers, risk management arrangements and systems of internal controls);
 - policies and processes for managing conflicts of interest (e.g. Codes of Conduct, Register of Interests).
7. The main updates to Governance Policy:
 - Paragraph 9 updated: Pension Fund Committee members are now expected to:
 - (1) complete their first-year training normally no later than 31st December;
 - and
 - (2) attend induction before attending their first meeting.
 - Paragraph 10 updated: named substitutes of the Committee must attend an induction before attending a meeting.
 - A copy of the revised Governance Policy can be found at **APPENDIX 2**.
8. The main updates to Governance Compliance Statement:
 - Principle B updated: frequency of briefing provided to Chair and Deputy Chair changed from monthly to quarterly.
 - A copy of the revised Governance Compliance Statement can be found at **APPENDIX 3**.

The Regulatory Breaches Policy

9. There are various legislative and regulatory requirements for Pension Funds regarding breaches:
 - i) Under the Pensions Act 2004, the Fund must report breaches of the law relating to the administration of the Pension Fund to the Pension Regulator and where data breaches occur to the Information Commissioner;
 - ii) The UK General Data Protection Regulation (UK GDPR) apply to the processing of personal data;
 - iii) The Pension Regulator's General Code of Practice provides practical guidance in relation to this legal requirement to Pension Funds.
10. The single update to the Regulatory Breaches Policy is at Paragraph 45 with the addition of: 'Where the duty to report to another body coincides with the duty to report to the TPR, the report to TPR should include details of the other bodies the matter has been reported to'. A copy of the revised Breaches Policy can be found at **APPENDIX 4**.
11. The Committee is recommended to approve these four revised policy documents.

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