PENSION FUND COMMITTEE
4 SEPTEMBER 2026

Governance and Communications Policy Review Report

Report by the Executive Director & Section 151 Officer

RECOMMENDATION

The Committee is RECOMMENDED to:

a) **Approve the revised Communications Policy.**
b) **Approve the revised the Regulatory Breaches Policy.**

Executive Summary

1. Governance and Communications are important functions of an effective pension fund. One important aspect of effective governance is the regular review of key policy documents. This report presents the recently revised Communications Policy and the 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.

5. The fund Communications Policy was last reviewed in June 2024. The revised Communications Policy can be found at **ANNEX 1**. The changes to the policy are as follows:

i) Point 19 – a general update to the Fund’s LinkedIn page paragraph;

ii) Point 20 – an update to the Fund’s position regarding social media;

iii) Annex A – brochures and consultations have been added to Fund Publications;

iv) Annex A – the following additions have been made to ‘Other Services’:

(1) ‘Contact Us’ functionality on the website;

(2) Investment surveys.

The Regulatory Breaches Policy

6. 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.

7. The fund Regulatory Breaches Policy was last reviewed in June 2024. The revised policy can be found at **ANNEX 2**. The changes to the policy are as follows:

i) Job titles have been updated throughout document;

ii) Point 7 – the addition of Independent Person under ‘professional advisers’.

iii) Point 26 - requirement added to notify members of a material contribution breach within 30 days of the breach. Addition made in response to General Code of Practice review of relevant module.

8. The Committee is recommended to approve these two revised policy documents

Financial Implications

19. There are no direct financial implications arising from this report.

Comments checked by:

Name, Title, email (Finance)

Corporate Policies and Priorities

20. The overall priorities of the Pension Fund are summarised as:

- To fulfil our fiduciary duty to all key stakeholders
- To administer pension benefits in accordance with the LGPS regulations, and the guidance set out by the Pensions Regulator
- To maintain a funding level above 100%
- To ensure there are sufficient liquid resources to meet the liabilities of the Fund as they fall due, and
- To maintain as near stable and affordable employer contribution rates as possible

Legal Implications

The legal implications section should be completed by a member of the legal service

21. This report has been prepared in accordance with the Oxfordshire County Council's (the "**Council**") responsibilities as the Administering Authority for the Oxfordshire Pension Fund.

22. As Administering Authority, the Council is responsible for managing and administering the Local Government Pension Scheme pursuant the Local Government Pension Scheme Regulations 2013 ("**LGPS Regulations 2013**").

23. The Council as Administering Authority determines its own governance arrangements and the delegation of those responsibilities which is set out in the Council's Governance Strategy Statement (v 2025). Pension Fund Reports are a non- executive function and presentation before Cabinet is not required.

24. Oxfordshire County Council as Administering Authority for the Fund delegates all functions relating to the management of the Pension Fund to the Pension Fund Committee. Certain functions are then further delegated by the Pension Fund Committee to Officers in accordance with the Scheme of Delegation. Officers report decisions back to the Pension Fund Committee.

25. Regulation 53A (Appointments that must be made by administering authorities) of the LGPS Regulations 2013 to be implemented with effect from 1st April 2026 by the Local Government Pension Scheme Amendments Regulations 2026 will requires the Administering Authority to have a senior Local Government Pension Scheme officer, "who has senior responsibility across all pension functions to ensure the fund is appropriately managed and resourced across administration, investment and governance matters" which much be in accordance with guidance issued by the Secretary of State. (**S53A**(**1**)) The

senior Local Government Pension Scheme officer ("**the senior LGPS officer**") is a statutory role.

26. The senior LGPS officer role is responsible for all aspects of managing the Local Government Pension Scheme within the Administering Authority.

27. In carrying out its functions, the Pension Fund Committee must act within the statutory framework governing the Local Government Pension Scheme (the "**LGPS**"), including pursuant to the Local Government Pension Scheme Regulations 2013, the Administering Authority's required governance and administration requirements, and the approved Pension Fund Governance Policy and Scheme of Delegation.

28. The Administering Authority must have regards to and publish its Pension Fund Strategy and any revisions pursuant to s59 of the LGPS Regulations 2013.

29. Any procurement, contractual, or data-handling matters connected with the implementation of decisions are managed in accordance with the Council's Contract Procedure Rules and Data Protection obligations. Further legal advice will be requested and provided where required. The senior LGPS officer has provided the legal team with full information relating to this report for review and consideration and answered any queries raised.

30. Both Section 151 Officer and the senior LGPS officer should approve pension fund accounts.

31. Legal team is assured that the Pension Fund Committee has taken appropriate advice to ensure the Committee fulfils its fiduciary duties to Scheme members and employers.

32. In view of all information provided, legal review of legislative and regulatory requirements, including impending enacted amendments to LGPS Regulations 2013, and the cogency of information provided by the senior LGPS officer who has consulted with the S151 Officer, the Pension Fund Committee Report, provided appropriate approval of pension fund accounts is provided pursuant to paragraph 70 above, the contents of this report satisfy the requirements of the LGPS Regulations 2013 (as amended) in respect of its administration, operation and management. The Council's legal team is satisfied that all regulatory, legislative and governance requirements pertaining to Oxfordshire County Council as Administering Authority are complied with, by the level of engagement, documentation provided for review, explanation and scrutiny offered by the senior LGPS officer and our opportunity for review.

Contact :

[Staff Implications]

33. There are no direct staff implications arising from this report.

[Equality & Inclusion Implications]

34. There are no direct equality and inclusion implications arising from this report.

[Sustainability Implications]

35. There are no direct sustainability implications arising from this report.

[Risk Management]

36. There are no direct risk management implications arising from this report]

Lorna Baxter
Executive Director of Resources and Section 151 Officer

Annex:	Annex 1: Communications Policy Annex 2: The Regulatory Breaches Policy
Background papers:	Nil
[Other Documents:]	Nil
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September 2026