

| Area | |
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| | A.1 |
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| | A.2 |
| A. General | |
| | A.3 |
| B. Conflicts of Interest | B.1 |
| | B.2 |
| C. Representation | C.1 |
| D. Knowledge and Understanding | D.1 |
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| | D.2 |
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| | D.3 |
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| | D.4 |
| | E.1 |
| | E.2 |
| | E.3 |

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| E. Service Delivery for the LGPS Function | E.4 |
| | E.5 |
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| F. Compliance and Improvement | F.1 |
| | F.2 |

| Proposal |
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| MHCLG will produce statutory guidance to establish new governance requirements for funds to effectively implement the proposals below. ("The Guidance") |
| 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") |
| Each administering authority must publish an annual governance compliance statement that sets out how they comply with governance requirements for LGPS Funds set out in "The Guidance". This statement must be signed by the LGPS Senior Officer and, where different, co-signed by the S151 officer. |
| 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, including reference to key conflicts identified in the Guidance. |
| The Guidance should refer to all those involved in the management of LGPS, and in particular those on decision making committees, to guide the statutory and fiduciary duty which will be produced by the SAB. |
| 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 representation and voting rights for each party. |
| Introduce a requirement in the Guidance for key individuals within the LGPS, including LGPS Officers and Pensions committee members, to have an appropriate level of knowledge and understanding to carry out their duties effectively. |
| Introduce a requirement for S151 Officers to carry out LGPS relevant training as part of their CPD requirements to ensure good levels of knowledge and understanding. |
| Administering authorities must publish a policy setting out their approach to the delivery, assessment and recording of training plans to meet these requirements. |
| CIPFA and other relevant professional bodies should be asked to produce guidance and training modules for S151 Officers and to consider LGPS training within the qualification of their syllabus. |
| Each administering authority must document key roles and responsibilities relating to its LGPS Fund 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 processes. |
| Each administering authority must produce an administration strategy. |
| Each administering authority must report the Fund's performance against an agreed set of indicators designed to measure standards of service. |

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 and budget allocated to deliver the LGPS Service over the next year.

Each administering authority must give proper consideration to the utilisation of pay and recruitment policies, including appropriate market supplements, relevant to the needs of their pension function. Administering authorities should not simply apply general staffing policies such as recruitment freezes to the pensions function.

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 SAB panel of experts.

LGA to consider establishing a peer review process for LGPS Funds.

| Brent Pension Fund Comments |
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| N/A |
| Compliant |
| Brent Pension Fund produces an annual governance compliance statement as part of its annual report. However, following approval of this proposal, Brent Pension Fund officers will use the guidance set to be produced by MHCLG in order to refine its annual governance compliance statement. |
| Following production of the guidance by MHCLG, Brent Pension Fund officers will use this in order to produce a conflicts of interest policy. |
| N/A |
| Compliant. Brent Pension Fund produces details on representation and voting rights as part of its annual report. |
| MHCLG are to introduce this requirement. Nonetheless, Brent Pension Fund introduces training at each Sub Committee and Board meeting to ensure that all relevant stakeholders have an appropriate level of knowledge and understanding to carry out their duties effectively. |
| Brent Pension Fund will review training courses provided by CIPFA and other professional bodies as outlined in D4 in order to ensure that requirements are met. |
| Following approval of this proposal, Brent Pension Fund officers will look to introduce and implement a training plan setting out key details such as its delivery, assessment and recording. |
| N/A |
| Brent Pension Fund officers are to review requirement E.1 and carry out initial work with a view to producing a roles and responsibilities matrix setting out how key decisions are reached. |
| Compliant |
| Compliant |

Brent Pension Fund officers are to review requirement E.4 in order to ensure full compliance.

Currently, Brent Pension Fund are applying a staffing policy aligned to Brent Council as a whole. However, officers will undertake initial work to produce a policy specific to the pension fund in order to ensure full compliance.

Brent Pension Fund to co-operate with the Independent Review and looks forward to receiving further details on implementation of this proposal.

N/A