

London Borough of Hillingdon Pension Fund

**Governance Policy and Compliance
Statement**

December 2023~~September 2020~~

Governance Policy and Compliance Statement– Administering Authority

London Borough of Hillingdon is the Administering Authority of the London Borough of Hillingdon Pension Fund and administers the Local Government Pension Scheme on behalf of participating employers.

Regulation 55 of the Local Government Pension Scheme Regulations 2013 requires Local Government Pension Scheme (LGPS) Administering Authorities to publish Governance Compliance Statements setting out information relating to how the Administering Authority delegates its functions under those regulations and whether it complies with guidance given by the Secretary of State for Communities and Local Government. It also requires the Authority to keep the statement under review and to make revisions as appropriate and where such revisions are made to publish a revised statement.

Aims and Objectives

The London Borough of Hillingdon recognises the significance of its role as Administering Authority to the London Borough of Hillingdon Pension Fund on behalf of its stakeholders which include (at time of drafting):

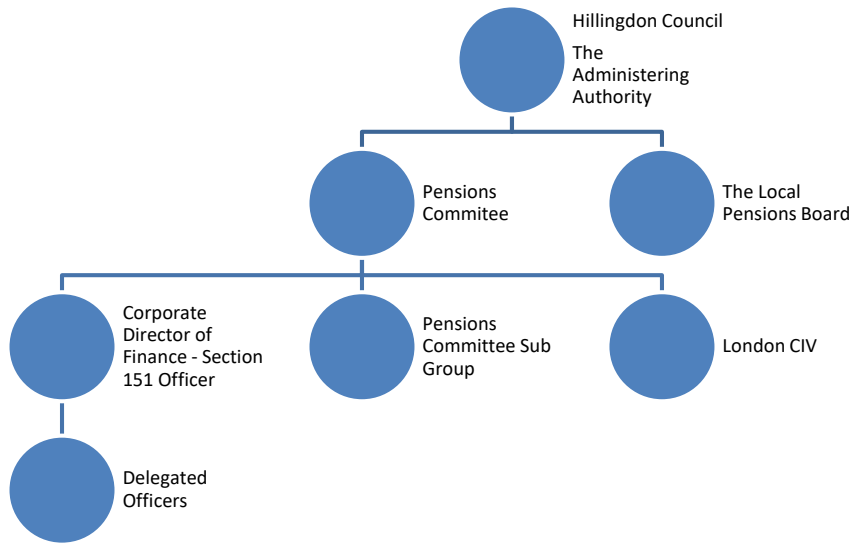
- around ~~32,000~~^{23,407} current and former members of the Fund, and their dependants
- over ~~11966~~ employers within the [London Borough of Hillingdon](#) Fund
- local taxpayers within the council areas participating in the [London Borough of Hillingdon Pension](#) Fund.

In relation to the governance of the Fund, our objectives are to ensure that:

- all staff and [members of the Pensions Committee and Local Pensions Board](#) Members charged with the financial administration and decision-making with regard to the Fund are fully equipped with the knowledge and skills to discharge the duties and responsibilities allocated to them
- the Fund is aware that good governance means an organisation is open in its dealings and readily provides information to interested parties
- all relevant legislation is understood and complied with
- the Fund aims to be at the forefront of best practice for LGPS funds
- the Fund manages Conflicts of Interest appropriately.

Structure

The Constitution of the Council sets out how the Council operates, how decisions are made and the procedures which are followed to ensure that these are efficient, transparent and that those who made the decisions are accountable to local people. The Constitution sets out the framework under which the Pension Fund is to be administered as shown in the diagram below.



Terms of Reference for the Pensions Committee

The Pensions Committee's principal aim is to carry out the functions of the London Borough of Hillingdon as the ~~Scheme Manager and~~ Administering Authority for the London Borough of Hillingdon Pension Fund in accordance with Local Government Pension Scheme regulations and any other relevant legislation.

In its role as the ~~Administering~~ ~~Authority~~, the London Borough of Hillingdon owes fiduciary duties to the employers and members of the ~~London Borough of Hillingdon Pension~~ Fund and must not compromise this with its own particular interests. Consequently this fiduciary duty is a responsibility of the Pensions Committee and its members must not compromise this with their own individual interests.

The Pensions Committee operates under the following terms of reference:

Terms of Reference

- ~~1. To review and approve all aspects of investment policy relating to the Pensions Fund, including agreeing the strategic asset allocation and authorisation or prohibition of particular investment activities.~~
- ~~2. To review the Investment Strategy Statement and amend it when necessary.~~
- ~~3. To agree benchmarks and performance targets for the investment of the Fund's assets and review periodically.~~
- ~~4. To agree to transfer funds into mandates managed by the London Collective Investment Vehicle (CIV) as soon as appropriate opportunities become available.~~
- ~~5. To receive regular reports from the London CIV and to agree and resultant actions from a review of the investments held with the London CIV.~~
- ~~6. To keep the performance of the investment managers under regular review and extend or terminate their contracts as required. To appoint new managers when necessary.~~
- ~~7. To agree policy guidelines for the exercise of voting rights attached to the Fund's shares.~~
- ~~8. To review the appointment of specialist advisors and service providers and make new appointments as necessary.~~
- ~~9. To consider the overall implications of the Council's policies for employment and benefits issues and their impact on the Pension Fund and agree any strategic changes.~~
- ~~10. To approve the appointment of persons to hear appeals under the Internal Dispute Resolution Procedure.~~
- ~~11. To consider issues concerning the administration of the Fund, including approving responses to consultation papers.~~
- ~~12. To consider and decide whether to approve proposals for discretionary enhanced early retirement packages for officers.~~
- ~~13. The Corporate Director of Finance be authorised to take urgent decisions in~~

~~relation to the pensions fund and investment strategy on behalf of the Committee, reporting back to the Pensions Committee any exercise of these powers for ratification.~~

~~The Committee considers all issues concerning the administration and investment of the Pension Fund. In particular:~~

- ~~1. To exercise all functions concerning the Pension Fund including, but not limited to: governance; funding; actuarial valuations; policies; accounting and audit; risk management, budgets and resourcing; investment, and administration.~~
- ~~2. To review and approve all aspects of investment policy relating to the Pensions Fund, including agreeing the strategic asset allocation and authorisation or prohibition of particular investment activities.~~
- ~~3. To review the Investment Strategy Statement and amend it when necessary.~~
- ~~4. To agree benchmarks and performance targets for the investment of the Fund's assets and review periodically.~~
- ~~5. To agree to transfer funds into mandates managed by the London Collective Investment Vehicle (CIV) as soon as appropriate opportunities become available.~~
- ~~6. To receive regular reports from investment managers including the London CIV and to agree resultant actions from a review of the investments held.~~
- ~~7. To keep the performance of the investment managers under regular review and extend or terminate their contracts as required. To appoint new managers when necessary.~~
- ~~8. To agree policy guidelines for the exercise of voting rights attached to the Fund's shares.~~
- ~~9. To review the appointment of specialist advisors and service providers and make new appointments as necessary.~~
- ~~10. To approve the appointment of persons to hear appeals under the Internal Dispute Resolution Procedure.~~
- ~~11. To set up a Pensions Sub-Group, should it be required, comprising 3 Elected Members politically balanced and relevant officers and advisors to:
 - ~~i. Be consulted on urgent decisions that are required to be taken by the Corporate Director of Finance in the absence of a Committee meeting;~~
 - ~~ii. Assist in strategic discussions with regard to the Pensions Fund and Investment Strategy, including the monitoring of fund manager performance and associated actions or investigations and making any recommendations on such matters to the Pensions Committee for decision.~~~~
- ~~12. The Corporate Director of Finance be authorised to take urgent decisions in relation to the pensions fund and investment strategy on behalf of the Committee, and if established, in consultation with any Pension Sub-Group, reporting back to the Pensions Committee for ratification~~

Membership of the Pensions Committee

Councillor membership of the Committee will be 5, will be politically balanced and have voting rights. In addition, the Independent Governance Adviser and Investment Consultant would normally attend meetings along with relevant officers in an advisory, non-voting capacity.

Meetings

The Council shall ~~agree~~^{fix} the day of meetings of the Pensions Committee and the ordinary meetings for the Pensions Committee shall be at Hillingdon Civic Centre, but they may arrange to meet elsewhere when they see fit. ~~In April 2020 the Government issued temporary legislation allowing Local Authorities to conduct virtual meetings. This is to enable decisions to continue to be made during the current COVID-19 pandemic where social distancing is required.~~

Pensions Committee meetings are broadcast ~~currently being conducted virtually~~ with

the public section being streamed live on the Council's youtube channel <https://www.youtube.com/user/HillingdonLondon>

The Chair may cancel meetings. The Pensions Committee meets every quarter and the dates are arranged annually in advance. The Chairman of the Committee may call a special meeting if required [or ask for a Pension Sub-Group to be convened.](#)

Access to Agenda, Reports and Minutes of Meetings

The Council will give at least seven clear working days notice of any meeting by posting details of the meeting at the Hillingdon Civic Centre and on the Council's website. The Council will make copies of the agenda and reports open to the public available for inspection at least five clear working days before the meeting. If an item is added to the agenda later, the revised agenda will be open to inspection from the time the item was added to the agenda. The reason for lateness will be specified in the report. There may on occasions be items, which may be exempt from the agenda, reports and minutes of the meetings when it is likely in view of the nature of the business to be transacted or the nature of the proceedings that confidential

information would be disclosed. Items which are most likely to be excluded are issues where to disclose information would contravene an individual's privacy or where there are financial interests which may be compromised as a result of disclosure for example discussions surrounding contracts. The Council will make available copies of the minutes of the meeting and records of decisions taken. Minutes of meetings and records of decisions are available for inspection on the Council's website: <http://www.hillingdon.gov.uk>

The Committee's full terms of reference can also be found on the Council's website.

Pension Sub-Group

As set out in the Terms of Reference, The Pension Sub-Group is able to meet as required to discuss urgent investment and other pension related issues; will be politically balanced and be supported by officers and advisers.

Scheme of Delegation

Where Council functions are not specifically reserved to the Pensions Committee in relation to the Pension Fund, the functions are deemed to be delegated to the relevant Chief Officers, or the Corporate Director of Finance in the case of the Pension Fund. The Corporate Director of Finance is responsible for the establishment of a scheme of delegation for their department which includes the Pension Fund function. The scheme of delegation specifies the function, names the post which may carry out that delegated decision and the limits if any on the delegation. The limits on delegation may include the obligation to consult record and/or refer back to the Chief Executive or Corporate Director of Finance in certain circumstances. The Finance Directorate has a scheme of delegation which sets out the delegated powers to individual officers within the directorate. In relation to the Pension Fund the management is delegated to the Corporate Director of Finance and responsible officer for the pension Fund. The scheme of delegation is reviewed regularly by the Council.

London CIV

The London CIV was formed as by the 33 London Boroughs in 2014 to pool their LGPS investments. It received regulatory authorisation from the Financial Conduct Authority in November 2015. The London CIV has been established as a collective investment vehicle for LGPS Funds. The current regulatory permissions allow for operation in public markets as an Authorised Contractual Scheme (ACS) Fund and for private markets -via their Exempt Unauthorised Unit Trust Vehicle (EUUT).

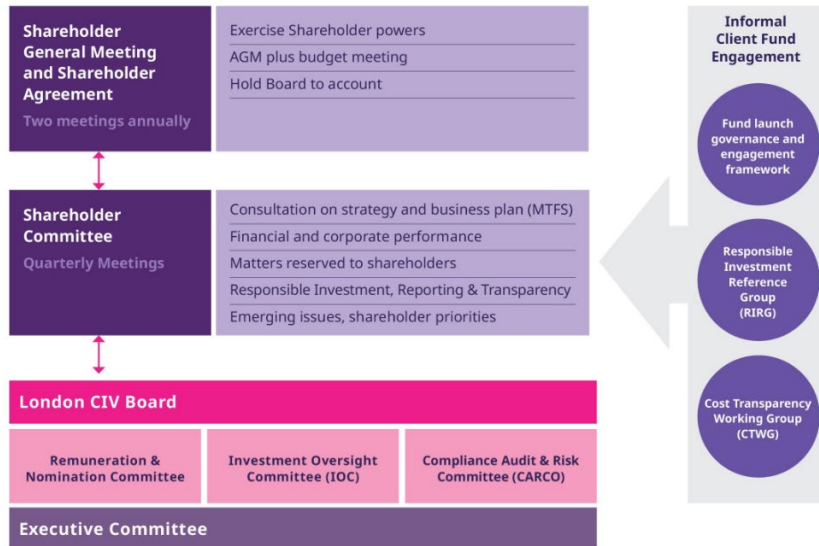
~~The governance arrangement of LCIV has been enhanced since the last governance policy review, to improve Client Fund engagement in 2019 following a consultation. The changes were particular in respect of arrangements for Client Fund engagement in fund decision making and Client Fund oversight.~~

The governance structure of the London CIV has been designed to ensure that there are both formal and informal routes to engage with the investing Funds both as shareholders and investors, making the London CIV accountable at both levels.

~~Major decisions, including approval of the budget, strategic objectives and business plan are reserved to shareholders in General Meeting as set out in a Shareholder Agreement~~

London CIV committee structure

Formal Governance



Major decisions, including approval of the budget, strategic objectives and business plan are reserved to shareholders in General Meeting as set out in a Shareholder Agreement.

Certain decisions require approval from all (or a majority of) shareholders. There are two meetings each year of all shareholders and quarterly meetings of a Shareholder Committee representative of shareholders. The Committee considers all reserved matters, emerging issues and corporate and financial performance. In addition, there are two shareholder nominated directors who are Leaders of London Local Authorities and a Treasurer Observer (s151 officer) on the Board. Information about individual Board members can be found [here](#).

The overall strategic direction, management and general policy of London CIV is vested in the Board, which is responsible for major decisions unless reserved to shareholders. The Executive Directors, led by the Chief Executive, are responsible for the day to-day management of the company and there is an Executive Committee which is attended by other senior managers in the firm. The Board Committees are an Investment Oversight Committee (IOC); a Compliance, Audit, and Risk Committee (CARCO); and a Remuneration and Nomination Committee (RemNomCo) which includes the Chair of the Shareholder Committee

amongst its membership. The Shareholder Committee is a consultative committee to the Board. You can read more about the work of the Board and Committee in the Annual Review.



London CIV Company Board

The Board, (subject to matters reserved to shareholders) include: Strategy and oversight of management of the company, budget and forward plan, reviews of performance, Major contracts and significant decisions including in relation to funds, financial reporting and controls, compliance, risk and internal controls, Key policies Governance

London CIV Shareholder Committee

The Shareholder Committee is made up of 8 Councillors, 4 London Treasurers and a trade union observer. The shareholder committee is consulted on London CIV's strategy, budget and business plan (MTFS); financial and corporate performance; all matters reserved to shareholders; emerging issues and shareholder priorities; Responsible Investment, and Reporting & Transparency. This role means that the Shareholder Committee plays an important role in identifying emerging issues and realistic solutions which will ensure that London CIV can deliver pooling to meet the needs of London. It has a key role in reviewing the budget and other matters reserved to shareholders before the Board makes a recommendation to all shareholders. There are 2 meetings each year of all shareholders and quarterly meetings of a Shareholder Committee representative of shareholders.

London CIV Investment Oversight Committee (IOC)

The IOC is responsible for: overseeing the investment activity of London CIV in line with the Company's strategy and business plan. This includes the appointment of investment managers as part of the fund launch process (subject to approval by the Board), and fund performance including the performance of investment managers.

London CIV Compliance Audit and Risk Committee (CARCO)

The committee is responsible for: overseeing compliance obligations; for the integrity of financial statements and reporting, auditor engagement; and for the risk and control framework.

London CIV Remuneration and Nomination Committee

This committee is responsible for: remuneration policy; remuneration of key staff; nomination matters (appointments) and succession planning for key staff and the Board.

Local Pension Board

In keeping with the Public Service Pensions Act 2013, Hillingdon Council has established a Local Pension Board (LPB). Local Pension Boards are not local authority committees; as such the Constitution of London Borough of Hillingdon, does not apply to the Pension Board unless it is expressly referred to in the Board's terms of reference. The [London Borough of Hillingdon Local Pension Board](#) was established by London Borough of Hillingdon on 1st April 2015. The terms of reference of the Board can be found on the Fund's website hillingdon.gov.uk/pensions.

Role of the Pension Board

The role of the Board as outlined in the legislation is to assist the ~~administering~~ [Administering](#) Authority in ensuring the effective and efficient governance and administration of the scheme including:

- securing compliance with the LGPS Regulations and any other legislation relating to the governance and administration of the Scheme, and requirements imposed in relation to the LGPS by the Pensions Regulator and:
- any other matters the LGPS regulation may specify.

The [Local](#) Pensions Board is not a decision making body, rather it has a compliance and scrutiny role to ensure the Pensions Committee effectively and efficiently complies with the code of practice on the governance and administration of public service pension schemes issued by the Pension Regulator. Additionally the [Local Pension Board](#) will help ensure that the London Borough of Hillingdon Pension Fund is managed and administered effectively and efficiently and complies with the codes of practice on the governance and administration of public service pension schemes issued by the Pension Regulator.

Membership of the Pension Board

The membership of the [Local Pensions](#) Board must be equally split between employer and scheme member representatives with relevant experience and the capacity to represent. Council has determined that membership shall be at least:

- 2 employer representatives - elected Members, appointed on the basis of political balance and appointed annually by Council. No elected Member may sit on both the Pensions Committee and the Pensions Board.
- 2 employee/scheme member representatives - selected at interview by the Chairman and one other Member of the Pensions Committee and a Senior Officer, on the basis of capacity and/or experience. Term of Office to be indefinite

Meetings

The [Local](#) Pension Board meets quarterly in the ordinary course of business and additional meetings may be arranged as required to facilitate its work. [It](#) ~~The Pension Board~~ is treated in the same way as a Committee of the London Borough of Hillingdon and, as such, members of the public may attend and papers will be made public in the same way as described above for the ~~Pensions~~ Committee.

Terms of reference of the Pension Board

- ~~1. The Pensions Board will meet at a frequency determined by the Board.~~
- ~~2. Reports to the Board will either reflect decisions taken by Pensions Committee or be reports for noting already seen by Pensions Committee.~~
- ~~3. The role of the Board will be to assist London Borough of Hillingdon Administering Authority as Scheme Manager: to secure compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS;~~
- ~~4. To secure compliance with requirements imposed in relation to the LGPS by the Pensions Regulator; and in such other matters as the LGPS regulations may specify.~~
- ~~5. To secure the effective and efficient governance and administration of the LGPS for the London Borough of Hillingdon Pension Fund.~~
- ~~6. To provide the Scheme Manager with such information as it requires to ensure that any member of the Pension Board or person to be appointed to the Pension Board does not have a conflict of interest. NB: Being a member of the LGPS is not seen as a conflict of interest.~~

1. The Pensions Board will meet at a frequency determined by the Board.
2. Reports to the Board will either reflect decisions taken by Pensions Committee or be reports for noting already seen by Pensions Committee.
3. The role of the Board will be to assist London Borough of Hillingdon Administering Authority as Scheme Manager: to secure compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS.
4. To secure compliance with requirements imposed in relation to the LGPS by the Pensions Regulator; and in such other matters as the LGPS regulations may specify.
5. To secure the effective and efficient governance and administration of the LGPS for the London Borough of Hillingdon Pension Fund.
6. To provide the Scheme Manager with such information as it requires to ensure that any member of the Pension Board or person to be appointed to the Pension Board does not have a conflict of interest. NB: Being a member of the LGPS is not seen as a conflict of interest.
7. The Board may agree a more detailed code of practice within the parameters of these Terms of Reference, as to how it operates to comply with other relevant guidelines.

Policy Documents

In addition to the foregoing, there are a number of other documents which are relevant to the Governance and management of the Pension Fund. Brief details of these are listed below and the full copies of all documents can be found on the Pension Fund Website: hillingdon.gov.uk/pensions.

Funding Strategy Statement

The Funding Strategy Statement forms part of the framework for the funding and management of the Pension Fund. It sets out how the Fund will approach its liabilities and contains a schedule of the minimum contribution rates that are required of individual employers within the Fund. The Funding Strategy Statement (FSS) is drawn up by the Administering Authority in collaboration with the Fund's actuary and after consultation with the Fund's employers. The FSS forms part of a broader framework which covers the Pension Fund and applies to all employers participating in the Fund. The FSS represents a summary of the Fund's approach to funding the liabilities of the Pension Fund.

Investment Strategy Statement

The Local Government Pension Scheme (Management and Investment of Funds) (Amendment) Regulations 2016 require pension fund administering authorities to prepare, maintain and publish a statement of the principles governing their decisions on the investment of the Pension Fund.

The areas covered in the Investment Strategy Statement are as follows:

- Investment objectives.
- Asset allocation

- Pooling of assets
- Investment implementation
- Investment governance
- Performance management
- Risk Management
- Environment, Social and Governance (ESG) policy

Governance Compliance Statement

This sets out the Pension Fund's compliance with the Secretary of State's Statutory Guidance on Governance in the LGPS. This is attached as Appendix A and shows where the Fund is compliant or not compliant with best practice and the reasons why it may not be compliant.

Training Policy

London Borough of Hillingdon has a Training Policy which has been put in place to assist the Fund in achieving its governance objectives and all Pensions Committee members, Pension Board members and ~~senior~~ officers are expected to continually demonstrate their own personal commitment to training and to ensuring that the governance objectives are met.

To assist in achieving these objectives, the London Borough of Hillingdon Pension Fund aims to comply with:

- the CIPFA Knowledge and Skills Frameworks and
- the knowledge and skills elements of the Public Service Pensions Act 2013 and the Pensions Regulator's (TPR) ~~cCodes~~ of ~~pPractice for Public Service Schemes~~

as well as any other LGPS specific guidance relating to the knowledge and skills of Pensions Committee members, Pension Board members or ~~pPension fFund~~ officers which may be issued from time to time.

Members of the Pensions Committee, Local Pension Board and officers involved in the management of the Fund will receive training to ensure that they meet the aims of ~~the~~ Training Policy with training schedules drawn up and reviewed on at least an annual basis.

Conflicts of Interest

The Hillingdon Pension Fund has a Conflicts of Interest Policy that outlines how to identify, monitor and manage conflicts of interest that may occur. A register of interest is also maintained for the Local Pension Board and declaration of interest in relation to members of the Pensions Committee are available on the Council's website. Fund managers and advisors are also required to submit their organisations conflict of interest policy. Declaration of interests is a standing item on both the Local Pension Board and Pensions Committee agenda.

Conflicts of interest have always existed for those with LGPS administering authority responsibilities as well as for advisers to LGPS funds. This simply reflects the fact that many of those managing or advising LGPS funds will have a variety of other roles and responsibilities, for example as a member of the scheme, as an elected Member of an employer participating in the LGPS or as an adviser to more than one LGPS administering authority. Further any of those persons may have an individual personal, business or other interest which might conflict, or be perceived to conflict, with their

role managing or advising LGPS funds.

It is generally accepted that LGPS administering authorities have both fiduciary and public law duties to act in the best interest of both the scheme beneficiaries and participating employers. This, however, does not preclude those involved in the management of the Fund from having other roles or responsibilities which may result in an actual or potential conflict of interest.

Annual Report and Accounts

As part of the financial standing orders it is the duty of the Corporate Director of Finance to ensure that record keeping and accounts are maintained by the Pension Fund. The Pension Fund accounts are produced in accordance with the accounting recommendations of the Financial Reports of Pension Schemes - Statement of Recommended Practice. The financial statements summarise the transactions of the Scheme and deal with the net assets of the Scheme. The statement of accounts is reviewed by both the Pensions Committee and the Audit Committee- and incorporated in the Statement of Accounts for the Council. Full copies of the Report and Accounts are distributed to employers in the Fund and other interested parties and a copy placed on the website: hillingdon.gov.uk/pensions.

Communication Policy

This ~~document sets out the communications~~ policy ~~of the administering authority and~~ sets out the strategy for ensuring that all interested parties are kept informed of developments in the Pension Fund ~~and the Fund complies with regulatory requirements~~. This helps to ensure transparency and an effective communication process for all interested parties. A copy of the policy can be found on the Pensions website: hillingdon.gov.uk/pensions.

Discretions Policies

Under the LGPS regulations, the Administering Authority has a level of discretion in relation to a number of areas, and ~~maintains at the~~ policy document detailing ~~ing~~ how it will exercise these discretions. The Administering Authority reviews these policies as appropriate and will notify interested parties of any significant changes. Employing Authorities are also required to set out their discretions policies in respect of areas under the Regulations where they have a discretionary power. Copies of both the Administering Authority and London Borough of Hillingdon's Employing Authority Discretions can be found on the website: <http://www.hillingdon.gov.uk>

Pension Administration Strategy

In order to assist with the management and efficient running of the Pension Fund, the Pension Administration Strategy encompassing administrative procedures and responsibilities for the Pension Fund for both the Administering Authority and Employing Authorities has been distributed to employers within the Fund following consultation and can be found on the website: hillingdon.gov.uk/pensions. This represents part of the process for ensuring the ongoing efficient management of the Fund and maintenance of accurate data and forms part of the overall governance procedures for the Fund.

Monitoring Governance of the London Borough of Hillingdon Pension Fund

The Fund's governance objectives will be monitored as follows:

| The Fund's governance objectives will be monitored as follows: Objective | Monitoring Arrangements |
|---|-------------------------|
|---|-------------------------|

| | |
|---|---|
| <p>Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies.</p> | <ul style="list-style-type: none"> • The Pensions Committee and the section 151 officer make decisions on behalf of the fund. • The Committee and Officers are also supported by various fund experts and advisors. • The Local Pensions Board has oversight of the decisions made to ensure compliance with relevant legislation and regulations • Policy and strategy documents are regularly reviewed and published to ensure they are up to date. |
| <p>Ensure the Pension Fund is managed and its services delivered by people who have the appropriate knowledge and expertise</p> | <ul style="list-style-type: none"> • A Training Policy is in place together with monitoring of all training by Pensions Committee members and key officers. A knowledge needs assessment takes place to inform the training plan. |
| <p>Act with integrity and be accountable to our stakeholders for our decisions, ensuring they are robust and well based</p> | <ul style="list-style-type: none"> • Pension Committee and Local Pension Board meetings are open to all stakeholders to attend and papers and minutes are published. • The Local Pension Board includes representatives from scheme members and employers in the Fund. • The Local Pension Board prepares and publishes an annual report which may include comment on decision making. |
| <p>Understand and monitor risk</p> | <ul style="list-style-type: none"> • A Risk Policy and risk register is in place. • Ongoing consideration of key risks at Pensions Committee meetings through the Risk Register. |
| <p>Strive to ensure compliance with the appropriate legislation and statutory guidance and to act in the spirit of other relevant guidelines and best practice guidance</p> | <ul style="list-style-type: none"> • The Governance of the Fund is considered by both the External and Internal Auditors. All External and Internal Audit Reports are reported to Pensions Committee. • The Fund maintains a log of all breaches of the law in accordance with the Fund's breaches procedure. |

Key Risks

The key risks to the delivery of this Strategy are outlined below. Pensions Committee members will monitor these and other key risks and consider how to respond to them.

- Changes in Pensions Committee membership, Pension Board membership and/or key officers resulting in loss of continuity and potentially diminishing knowledge and understanding
- Changes in government / legislative requirements meaning insufficient time allocated to ongoing management, either at Pensions Committee meetings or as part of key officers' duties
- Ineffective delegation of duties and/or presentation of Pensions Committee items resulting in insufficient time spent on key matters
- Poor attendance and/or a lack of engagement at training and/or formal meetings by Committee members, Board members and/or other key officers resulting in a poor standard of decision making and/or monitoring
- Conflicts of interest not being appropriately managed by Committee

members, Board members and/or key officers.

Approval, Review and Consultation

This Governance Policy and Statement was approved at the London Borough of Hillingdon Pensions Committee meeting on 13 December 2023. Local Pension Board will review 28 October 2020 following consultation with the Hillingdon Local Pension Board the policy and -it will be formally reviewed and updated at least every three years or sooner if the governance arrangements or other matters included within it merit reconsideration.

Contact Information

Any enquiries in relation to the Fund's governance or the principles or content of this Strategy, or for further information on the Fund, contact:

James Lake, Director of Pensions, Treasury & Statutory Accounts Chief Accountant
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
UB8 1UW

E-mail - jlake@hillingdon.gov.uk
Telephone - 01895 277 562

Website: hillingdon.gov.uk/pensions

Governance Best Practice – Compliance Statement

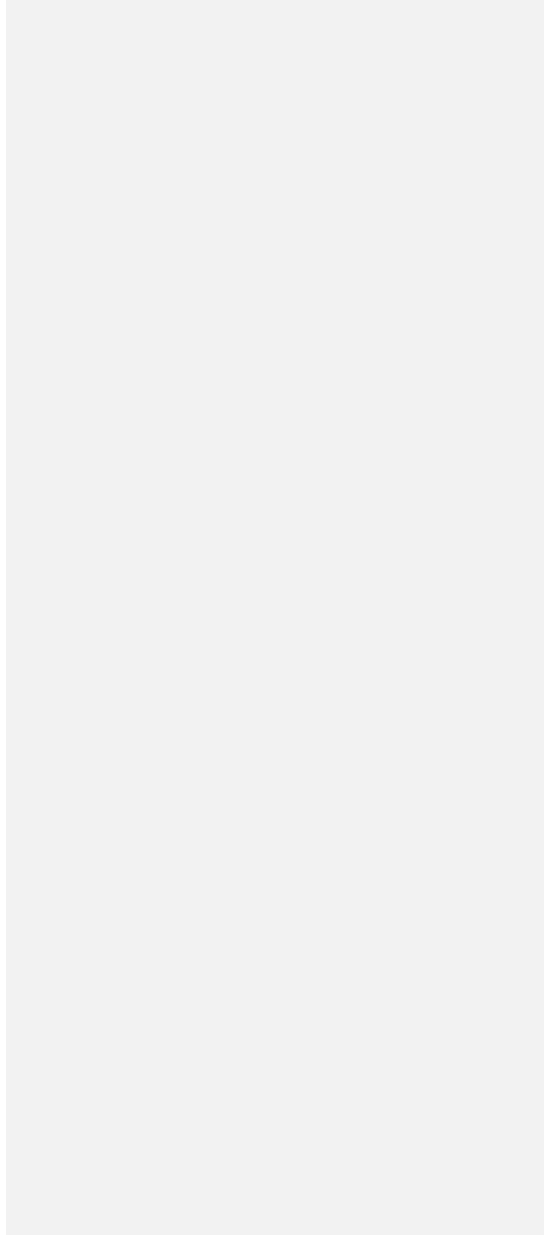
Appendix A – London Borough of Hillingdon Pension Fund Governance Compliance Statement

| Best Practice | Compliant or not? | Explanatory Note |
|--|-------------------|--|
| A. STRUCTURE & REPRESENTATION | | |
| a. The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council. | Fully compliant | |
| b. That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee. | Non-compliant | Prior to establishment of the Local Pensions Board , both employees and Unions were represented on Pensions Committee. However, membership of the Local Pensions Board now includes pensioner, employer representative, and employee representative. Pensions Board. |
| B. REPRESENTATION | | |
| a. That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include:- i) employing authorities (including non-scheme employers, e.g. admitted bodies); ii) scheme members (including deferred and pensioner scheme members), iii) where appropriate, independent professional observers, and iv) expert advisors (on an ad-hoc basis). | Non-compliant | Council took the decision to only have Council Members as voting members on Committee. Meetings are open to all to attend, but main representation comes through Local Pensions Board . The Local Pension Board members attend Committee meetings and they also reviews all decisions taken by the Committee. |

| Best Practice | Compliant or not? | Explanatory Note |
|--|-------------------|------------------|
| <p>b. That where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers and meetings, training and are given full opportunity to contribute to the decision making process, with or without voting rights.</p> | N/A | |
| C. SELECTION AND ROLE OF LAY MEMBERS | | |
| <p>a. That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.</p> | Fully compliant | |
| <p>b. That at the start of any meeting committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda.</p> | Fully compliant | |
| D. VOTING | | |
| <p>a. The policy of individual administering authorities- on voting rights is clear and transparent, <u>and forms part of the Local Government and Housing Act 1989. This oncludes -including- the justification for not extending voting rights to <u>co-opted members or other each body of groups</u> represented on main LGPS committees.</u></p> | Fully Compliant | |
| E. TRAINING / FACILITY TIME / EXPENSES | | |
| <p>a. That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process.</p> | Fully compliant | |
| <p>b. That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.</p> | Fully Compliant | |

Formatted Table

| | | |
|--|----------------------------|--|
| c. That the administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken. | <u>Partially-compliant</u> | <u>Following a needs assessment and workplan</u> a No annual training plan as training is developed according to need and workplan . A training log is maintained. |
|--|----------------------------|--|



| Best Practice | Compliant or not? | Explanatory Note |
|---|-------------------|---|
| F. MEETINGS (FREQUENCY/QUORUM) | | |
| a. That an administering authority's main committee or committees meet at least quarterly. | Fully compliant | |
| b. That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits. | N/A | |
| c. That an administering authority who do not include lay members in their formal governance arrangements, must provide a forum outside of those arrangements by which the interests of key stakeholders can be represented | Fully compliant | Local Pensions Board |
| G. ACCESS | | |
| a. That subject to any rules in the council's constitution, all members of main and secondary committees or panels have equal access to committee papers, documents and advice that falls —to be considered at meetings of the main committee. | Fully compliant | |
| H. SCOPE | | |
| a. That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements. | Fully compliant | Pensions Committee remit covers all pPension Fund matters. Through Pensions Board |
| I. PUBLICITY | | |
| a. That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements. | Fully compliant | |

Appendix B

Delegation of Functions to Officers by Pensions Committee

Key:

PC – Pensions Committee CDF – Corporate Director of Finance FA – Fund Actuary
 Advisers – Investment, actuarial and/or benefits consultants as appropriate

| Function delegated to PC | Further Delegation to Officer(s) | Delegated Officer(s) | Communication and Monitoring of Use of Delegation |
|--|--|--|--|
| <p>Investment strategy - approving the Fund's Investment Strategy Statement including specific liability profile and risk appetite.</p> <p>Monitoring the implementation of these policies and strategies on an ongoing basis.</p> | <p>Rebalancing and cash management</p> <p>Implementation of strategic allocation</p> | <p>CDF (having regard to ongoing advice of advisers)</p> | <p>High level monitoring at PC with more detailed monitoring by CDF</p> |
| <p>Selection, appointment and dismissal of the Fund's advisers, including actuary, benefits consultants, investment consultants, global custodian, fund managers, lawyers, Pension Funds administrator, and independent professional advisers.</p> | <p>Ongoing monitoring of Fund Managers</p> | <p>CDF (having regard to ongoing advice of advisers and subject to ratification by PC)</p> | <p>High level monitoring at PC with more detailed monitoring by advisers</p> |

| Function delegated to PC | Further Delegation to Officer(s) | Delegated Officer(s) | Communication and Monitoring of Use of Delegation |
|---|--|--|--|
| Agreeing the terms and payment of bulk transfers into and out of the Fund. | Agreeing the terms and payment of bulk transfers into and out of the Fund where there is a bulk transfer of staff from the Fund. Exceptions to this would be where there is a dispute over the transfer amount or it relates to significant assets transfers relating to one employer or the Fund as a whole | CDF after taking appropriate advice from the FA. | Ongoing reporting to PC for noting |
| Making decisions relating to employers joining and leaving the Fund. This includes which employers are entitled to join the Fund, any requirements relating to their entry, ongoing monitoring and the basis for- leaving the Fund. | Making decisions relating to employers joining and leaving the Fund and compliance with the Regulations and policies. This includes which employers are entitled to join the Fund, any requirements relating to their entry, ongoing monitoring and the basis for leaving the Fund where the employer. | CDF after taking appropriate advice from the FA. | Ongoing reporting to PC for noting |
| To set review the Pension Fund's policy and strategy documents on a regular cycle and review performance against the Fund's objectives within the business plan | Changes to Administering Authority discretionary policies necessitated by changes to regulations - authority to amend the policies to reflect the requirements of such new regulations, subject to those decisions having no significant financial implications. | CDF and the Head of HR | Copy of policy to be circulated to PC members once approved. |

| Function delegated to PC | Further Delegation to Officer(s) | Delegated Officer(s) | Communication and Monitoring of Use of Delegation |
|--|---|---|--|
| Agreeing the Administering Authority responses to consultations on LGPS matters and other matters where they may impact on the Fund or its stakeholders. | Agreeing the Administering Authority responses where the consultation timescale does not provide sufficient time for a draft response to be approved by PC. | CDF, subject to agreement with Chairman | PC advised of consultation via e-mail (if not already raised previously at PC) to provide opportunity for other views to be fed in. Copy of consultation response provided at following PC for noting. |
| Overall responsibility the Fund's Knowledge and Skills Training Policy for all Pensions Committee members and for all officers of the Fund, including determining the Fund's knowledge and skills framework, identifying training requirements, developing training plans and monitoring compliance with the policy. | Implementation of the requirements of the The Pensions Regulator codes and the CIPFA Code of Practice ¹ . | CDF | Regular reports provided to PC |
| The Committee may delegate a limited range of its functions to one or more officers of the Authority. The Pensions Committee will be responsible for outlining expectations in relation to reporting progress of delegated functions back to the Pensions Committee. | Other urgent matters as they arise | CDF, subject to agreement with Chairman | PC advised of need for delegation via e-mail as soon as the delegation is necessary. Result of delegation to be reported for noting to following PC. |
| | Other non-urgent matters as they arise | Decided on a case by case basis | As agreed at PC and subject to monitoring agreed at that time. |

¹ CIPFA Code of Practice recommends each administering authority delegates responsibility for implementation to a senior officer.