



**Buckinghamshire County Council Pension Fund  
Governance Compliance Statement  
November 2018**

## **1. Introduction**

- 1.1 This is the Governance Compliance Statement of the Buckinghamshire Pension Fund which operates as part of the Local Government Pension Scheme and is administered by Buckinghamshire County Council (the Council).
- 1.2 This statement has been prepared as required by Regulation 55 of the Local Government Pension Scheme Regulations 2013.

## **2. Governance Arrangements**

- 2.1 Under the terms of the Council's Constitution, the functions of the Council as Administering Authority of the Pension Fund are delegated to the Pension Fund Committee and are excluded from the delegation of authority to the Cabinet and other Committees. The Pension Fund Committee is supported by officers of the Council, investment consultants and an independent adviser. Governance arrangements are outlined in the Governance Policy Statement.
- 2.2 The Pension Fund Committee meets five times a year and its members act in a quasi-trustee capacity. Under the Constitution, it is responsible for administering, investing and managing the Fund. Further meetings can be arranged if required. Terms of reference are available on the Council's website at:

<http://democracy.buckscc.gov.uk/mgConvert2PDF.aspx?ID=11106>

- 2.3 The purpose of the Local Pension Board is to assist the administering authority in its role as a scheme manager of the Scheme. This covers all aspects of governance and administration of the LGPS, including funding and investments. Such assistance is to secure compliance with the Regulations, any other legislation relating to the governance and administration of the Scheme and any requirements imposed by the Pensions Regulator in relation to the Scheme. The Board must also ensure the effective and efficient governance and administration of the Scheme and help the administering authority, including undertaking work requested by the administering authority. Meetings are held four times a year. The Terms of Reference were adopted at the Board's first meeting and are available on the Council's website.

## **3. Functions and Responsibilities**

- 3.1 The Pension Fund Committee approves the Pension Fund's Funding Strategy, the Investment Strategy Statement, the Governance Policy Statement and the Communications Policy. Other key responsibilities of the Committee include:
  - Policy approval
  - Appointing Advisers and monitoring Fund performance
  - Monitoring Scheme Governance

- 3.2 The Funding Strategy sets out the aims and purpose of the Fund and the responsibilities of the administering authority as regards funding the scheme. Regulation 7 of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 to formulate, publish and maintain an Investment Strategy Statement.
- 3.3 The Investment Strategy Statement required by Regulation 7 must include:-
- (a) a requirement to invest money in a wide variety of investments;
  - (b) the authority's assessment of the suitability of particular investments and types of investments;
  - (c) the authority's approach to risk, including the ways in which risks are to be measured and managed;
  - (d) the authority's approach to pooling investments, including the use of collective investment vehicles and shared services;
  - (e) the authority's policy on how social, environmental or corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments; and
  - (f) the authority's policy on the exercise of rights (including voting rights) attaching to investments.
- 3.4 The Investment Strategy Statement must also set out the maximum percentage of the total value of all investments of fund money that it will invest in particular investments or classes of investment.
- 3.5 The Communications Policy details the overall strategy for involving stakeholders in the Pension Fund. The Pension Fund also has a Governance Policy Statement which outlines many of the frameworks identified within this document. Additionally, an administering authority discretions document has been developed stating those discretions found within the scheme that it has adopted. All documentation is published at [www.buckscc.gov.uk/pensions](http://www.buckscc.gov.uk/pensions)
- 3.6 The Pension Administration Strategy is an important tool in managing and improving the administrative performance of the Fund. It formally sets out the requirements of both Buckinghamshire County Council as the Administering Authority and participating employers/third party payroll providers in the Fund in a single document within one framework, a formal review is undertaken every three years.

#### **4. Representation**

- 4.1 The Pension Fund Committee has 9 members as follows:
- Six Elected Members from Buckinghamshire County Council
  - One Elected Co-Opted Member from Milton Keynes Council
  - One Elected Police and Crime Commissioner (PCC) or Deputy PCC from Thames Valley Police

- One Elected Co-Opted Member chosen by the four District Councils in Buckinghamshire

Members have Quasi-Trustee status and consequently substitutions are not permitted.

- 4.2 The Local Pension Board has 8 members comprising of 4 employer representatives and 4 scheme member representatives

## **5. Stakeholder Engagement**

- 5.1 A triennial meeting of the Pension Fund, called the 'Pensions General Meeting', is held in November/December in the year of the Fund valuation (the year prior to when the revised contribution rates from the valuation are due to come into effect), to which all employer representatives and scheme members are welcome. The purpose of the meeting is to report on investment performance and current issues of concern to the Fund stakeholders.

- 5.2 Mechanisms used to involve stakeholders include:

- Communication with Scheme Employers
- Dedicated Employer Liaison Officers and Communications Officer
- Training Events
- Meetings with the Actuary and the Auditors
- Meetings with Advisors
- Meetings with Brunel Pension Partnership
- Buckinghamshire Finance Officers meetings
- The annual report for the Pension Fund
- Scheme member newsletters/updates

## **6. Review and Compliance with Best Practice**

- 6.1 This statement will be kept under review and will be revised and published annually or following any material change in the Governance Policy Statement of the Pension Fund.
- 6.2 The Pension Fund is regularly audited and no material findings have arisen from either our internal or external auditors.
- 6.3 The Regulations require a statement as to the extent to which the governance arrangements comply with guidance issued by the Secretary of State. This statement is confirming that all the above mentioned mechanisms are in place and are effective and embedded. Any breach of our Governance Policy would be outlined in this document and reported to the Chairman of the Pension Fund Committee. A summary of our compliance with recommended good practice is outlined below.

**Responsible Officer:** Claire Lewis-Smith, Principal Pensions Officer  
(Governance & Employer Liaison)

<b>Good Practice Requirement</b>	<b>Met/Not Met</b>	<b>Evidence</b>
<b>Structure</b>		
The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing Council.	Met	Pension Fund Committee (PFC) Terms of Reference
That representatives of LGPS Scheme employers 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.	Met	PFC Terms of Reference and Buckinghamshire Pension Board (BPB) Terms of Reference
That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.	Met	PFC meets five times per year and BPB meets four times per year. BPB minutes are on the PFC agenda and vice-versa
<b>Representation</b>		
That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include: - i) Scheme employers (including non-local government employers, e.g. admitted bodies); ii) Scheme members (including deferred and pensioner scheme members), iii) Independent professional observers, and iv) Expert advisors (on an ad-hoc basis).	Met	Key stakeholders on PFC or BPB as per Terms of Reference  i) PFC and BPB ii) BPB iii) PFC and BPB iv) PFC and BPB
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.	Met	All PFC members and advisers get all papers except where it concerns them.  BPB members are provided with relevant training as required under The Pensions Regulator's Code of Practice 14
<b>Selection and role of lay members</b>		
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	Met	This is set out in the Committee's terms of reference.

committee.		
<b>Voting</b>		
The policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on main LGPS committees.	Met	Voting rights are not specifically noted in the PFC Terms of Reference. However under section 4 (Membership) there are 9 members and under section 4.5 it is noted that members have Quasi-Trustee status and therefore no substitutions are permitted. Section 4.6 confirms the Quorum is 4 members. BPB has 4 employer representatives and 4 scheme member representatives. The Terms of Reference confirms the Quorum is 4 Board members, comprising of at least 2 employer and 2 scheme member representatives. Substitutions are not permitted.
<b>Training/facility time/expenses</b>		
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.	Met	<p>Training for PFC members is undertaken annually as detailed by the PFC training plan.</p> <p>This organisation has adopted the key recommendations of the <i>Code of Practice on Public Sector Pensions Finance Knowledge and Skills</i>. Reimbursement of Expenses is defined in BCC constitution.</p> <p>Training for BPB members is undertaken in accordance with The Pensions Regulator's Code of Practice 14.</p>
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.	Met	Reimbursement of expenses is defined in BCC Constitution.
<b>Meetings (frequency/quorum)</b>		
That an administering authority's main committee or committees meet at least quarterly.	Met	PFC Terms of Reference.
That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main	Met	BPB Terms of Reference.

committee sits.		
<b>Access</b>		
That subject to any rules in the council 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.	Met	Confirmed that this applies by Member Services.
<b>Scope</b>		
That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	Met	PFC forward plan requires Senior Pension officers to attend meetings to discuss and raise issues outside the usual scope of Pension Fund Investment.
<b>Publicity</b>		
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.	Met	All non-confidential agendas, papers and minutes are on BCC external website. There is a separate policies section on the website where all governance policies are available.