

## Wiltshire Pension Fund Governance Compliance Statement

| AREA         | PRINCIPLE  | LEVEL OF COMPLIANCE   | REASON FOR NON-COMPLIANCE |
|--------------|--|---|---------------------------|
| A) Structure | 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.   | <b>FULL – The Council’s constitution (Part 3, para 2.5) says that the Committee will “exercise the functions of the Council as Administering Authority under the Local Government Superannuation Act and Regulations and deal with all matters relating thereto”. The Wiltshire Pension Fund Committee has the power to “...make decisions on matters of significant policy...” (Part 3B, para 4).</b>  | N/A                       |
|              | 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. | <b>FULL – There are two voting representatives from Swindon Borough Council, two voting representatives from Admitted Bodies and 2 UNISON Observers (representing active, deferred and pensioner members), all of whom are members of the main committee.</b><br><br><b>There is an Investment Sub-Committee (ISC) to deal with the on-going monitoring of investment managers, appointment of new managers, review any emerging investment opportunities and to consider and determine opportunistic investments to the value of 5% of the Fund’s total assets. This consists of 4 voting members, namely the Chairman, Vice-Chairman, one Wiltshire Council elected member from the main committee and one co-opted member of the main committee. All</b> | N/A                       |

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|                   |  | members of the main committee may be an observer.  |                                  |
|                   | c) That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.   | <b>FULL – All minutes of meetings and decisions taken by the ISC are reported back to the next main committee meeting.</b>   | N/A                              |
|                   | d) That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel.  | <b>FULL – At least 4 members of the ISC sit on the main committee.</b>   | N/A                              |
| B) Representation | <p>a) That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include:</p> <ul style="list-style-type: none"> <li>i. employing authorities (including non-scheme employers, eg, admitted bodies);</li> <li>ii. scheme members (including deferred and pensioner scheme members);</li> <li>iii. independent professional observers; and</li> </ul> | <p><b>FULL – four representatives in total, two from Swindon Borough and two from Admitted Bodies. The non-elected members will hold their office for a maximum of 4 years before a re-election process needs to take place.</b></p> <p><b>FULL – two representatives from UNISON, who represent active, deferred and pensioner members</b></p> <p><b>FULL – Our Independent Pension Adviser, who attends all meetings, fulfils this role and feeds back any observations to the Chief Finance Officer and/or Head of Pensions</b></p> | <p>N/A</p> <p>N/A</p> <p>N/A</p> |

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|                                      | <p>iv. expert advisors (on an ad-hoc basis).</p> <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>                          | <p><b>FULL – Mercers (the Fund’s Investment Consultant) and Hymans Robertson (the Fund’s Actuary) attends all meetings where expert advice is required</b></p> <p><b>FULL – All members of the Committee are given equal access to papers, meetings and training and are able to fully participate in debates.</b></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> <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> | <p><b>FULL – Full Induction Training and Governance is given and each member is given a Members’ Handbook outlining their responsibilities amongst other information.</b></p> <p><b>FULL – this is a standard part of committee procedure.</b></p>  | N/A                       |
| D) Voting                            | <p>a) 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.</p>  | <p><b>FULL – The Committee has afforded each of its members voting rights, except the UNISON Observers who represent members. Being a statutory pension scheme, the local committee has very little influence over benefits and the members are fully protected by statute. Therefore, there is very little that scheme members (or their representatives) can influence on the committee that has any direct impact upon them.</b></p> | N/A                       |

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|                                    |   | Further, giving voting rights to the observers would mean increasing the size of the Committee, because the Administering Authority must legally be able to maintain a majority.   |                           |
| E) Training/Facility Time/Expenses | 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. | FULL – There is a <b>Members’ Training Plan</b> which is updated regularly and fully implemented. All members (including observers) have full access to all training opportunities and are allowed to claim all reasonable expenses.   | N/A                       |
|                                    | 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.  | FULL – see <b>Members Training Plan</b>  | N/A                       |
| F) Meetings - Frequency            | a) That an administering authority’s main committee or committees meet at least quarterly.  | FULL – The <b>Committee meets four times per year, plus ad-hoc for special issues (eg. valuation, tenders)</b>   | N/A                       |
|                                    | 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.   | FULL – The <b>ISC meets two times per year, with a potential two further meetings scheduled should they be required.</b>   | N/A                       |
|                                    | c) That administering authorities who do not include lay members in their formal governance arrangements, provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.  | FULL –From 1 April 2015, <b>Wiltshire Council in its role of Administering Authority will establish a Local Pension Board. This will consist of 6 voting members (3 employer and 3 member representatives) along with a non-voting independent chair. The purpose of this Board is to review and ensure the Wiltshire Pension Fund</b> | N/A                       |

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|              |   | secures compliance with the Scheme regulations and all other relevant legislations.  |                           |
| 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.               | <b>FULL – All members of the Committee (including non voting and substitute members) receive all the papers for every meeting, including the confidential ones</b>   | <b>N/A</b>                |
| H) Scope     | a) That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.  | <b>FULL – All matters in relation to the Fund, whether Benefits, Governance, Investments, Communications, Employers, Financial, etc, are covered by the governance arrangements.</b>   | <b>N/A</b>                |
| 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. | <b>FULL – the Governance Compliance Statement is available on the Wiltshire Pension Fund Website and in the Wiltshire Pension Fund Annual Report. This statement is approved by the main committee which is held as a meeting open to public participation</b> | <b>N/A</b>                |

**12 March 2015**

**Wiltshire Pension Fund Committee**