Governance Policy and Compliance Statement

Introduction

This Policy and Compliance Statement details the governance arrangements for the Northamptonshire Pension Fund, which is maintained by West Northamptonshire Council, as required by Regulation 55 of the Local Government Pension Scheme Regulations 2013.

Under Regulation 55 of that provision all LGPS Funds are required to produce a Governance Compliance Statement which must be published and revised upon any material change in delegation arrangements.

The statement must set out -

(a) whether the authority delegates its functions, or part of its functions under these Regulations to a committee, a sub-committee or an officer of the authority:

(b) if the authority does so –

(i) the terms, structure and operational procedures of the delegation,

(ii) the frequency of any committee or sub-committee meetings,

(iii) whether such a committee or sub-committee includes representatives of Scheme employers or members, and if so, whether those representatives have voting rights.

(c) the extent to which a delegation, or the absence of a delegation, complies with guidance given by the Secretary of State and, to the extent that it does not so comply, the reasons for not complying; and

(d) details of the terms, structure and operational procedures relating to the local pension board established under Regulation 53(4)

Each administering authority must –

(a) keep the statement under review and make such revisions as are appropriate, following a material change,

(b) in preparing and reviewing the statement, consult such persons as it considers appropriate,

(c) publish its statement and any revised statement.

Review

The Policy and Compliance Statement is reviewed by Officers on an annual basis, the most current reviews undertaken are listed below:

|  |  |
| --- | --- |
| **Date of review** | **Review type** |
| 4 October 2023 | Officer review |
| 2 October 2024 | Officer review |

Governance Structure

The Northamptonshire Pension Fund governance structure is shown below.

West Northamptonshire Council

(the Administering Authority)

Local Pension Board

Pension Committee

Access Joint Committee

Exec Director of Finance/

s151 Officer

Monitoring Officer

Investment Sub Committee

Head of

Pensions

Governance Policy

Scheme of Delegations for the Northamptonshire Pension Fund

West Northamptonshire Council has delegated its functions in relation to the maintenance of the Northamptonshire Pension Fund to its Committees and Local Pension Board as follows:

The Pension Committee

Role and Function

To be responsible for the Council’s statutory function as administering authority under the Local Government Pension Scheme Regulations and associated legislation under Sections 7, 12 and 24 of the Superannuation Act 1972. The Committee will be established under s101 of the Local Government Act 1972.

The Pension Committee will be provided with full delegated powers to discharge the following functions on behalf of the Council to deal with all matters relating to the Northamptonshire Local Government Pension Scheme;

Membership, Chairing and Quorum

| Number of Members | 13 |
| --- | --- |
| Chair and Vice Chair’s Term of Office | Term of office will be one year.  The appointment /removal of the Chair will be a function of the Council. The appointment of the Vice Chair shall be a function of the Pension Committee.  The Chair and Vice Chair of the Pension Committee will represent the Northamptonshire Pension Fund on the Joint Committee of the ACCESS pool. |
| Substitute Members Permitted | Designated substitutes only due to the skills and knowledge requirements. |
| Political balance rules apply | Yes, within West Northamptonshire Council membership. |
| Restrictions on Membership | None. |
| Quorum | 5. |
| Number of ordinary meetings per Council year | A minimum of 4 . |
| Voting rights | All representatives have equal voting rights. |
| Training requirements | Members may not take part on the meetings of the Pension Committee unless they are committed to the skills and knowledge requirements set out by the Chair. |

Terms of Reference

* To deal with all matters relating to the Northamptonshire Pension Fund Local Government Pension Scheme.
* Authority to set the Pension Fund’s objectives and determine and maintain appropriate strategies, policies and procedures with ongoing monitoring in the following areas:
  + Funding Strategy – ongoing monitoring and management of the liabilities including ensuring appropriate funding plans are in place for all employers in the Fund. Overseeing the triennial valuation and interim valuations and working with the actuary in determining the appropriate level of employer contributions for each employer.
  + Investment Strategy – to determine the Fund’s investment objectives and to set and review the long term high level investment strategy to ensure these are aligned with the Fund’s specific liability profile and risk appetite
  + Administration Strategy – the administration of the Fund including collecting payments due, calculating and paying benefits, gathering from and providing information to scheme members and employers.
  + Communications Strategy – determining the methods of communications with the various stakeholders including scheme members and employers.
  + Discretions – determining how the various administering authority discretions are operated for the Fund.
  + Risk Management Strategy – to include regular monitoring of the Fund’s key risks and agreeing how they are managed and/or mitigated.
  + Governance – other key governance documents concerning the management and administration of the Northamptonshire Pension Fund such as strategies, policies and procedures such as the Overpayments of Pension Entitlement Policy and Reporting Breaches of the Law to the Pensions Regulator.
* Authority to approve and apply the policy on, and to take decisions relating to, employers joining and leaving the Fund and bulk transfers in and out of 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.
* Authority to consider and agree business plans at least annually and monitor progress against them.
* Authority to develop and maintain a skills and knowledge framework for all Pension Committee and Investment Sub-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 attendance at training events.
* Authority to select, appoint, monitor and where necessary terminate advisers to the Fund not solely relating to investment matters.
* Authority to agree the Administering Authority responses to consultations on LGPS matters and other matters where they may impact on the Fund or its stakeholders.
* Authority to consider and determine where necessary, alternative investment strategies for participating employers.
* Authority to oversee the work of the Investment Sub-Committee and consider any matters put to them by the Investment Sub-Committee.
* Authority to set up sub-committees and task and finish groups including jointly with other LGPS Administering Authorities.
* Authority to review and amend the Strategic Investment policies on an appropriate regular basis, in consultation with the Section 151 Officer.
* Authority to manage any other strategic or key matters pertaining to the Fund not specifically listed above.
* Production of an annual report for consideration by the Council.
* Consider and review the financial accounts in advance of approval by the Audit Committee.
* In relation to pooled asset arrangements under the ACCESS Joint Committee:
  + Providing a representative to sit on the Joint Committee to represent the interests of the Northamptonshire Pension Fund
  + Determining the requirements of the Administering Authority in relation to the provision of services by ACCESS to enable it to execute its investment strategy effectively.
  + Receiving and considering reports from the ACCESS Joint Committee in order to ensure that the Fund’s investor rights and views are represented appropriately.
  + Ensuring arrangements are in place to identify and manage the risks and costs associated with investment pooling.
  + On receipt of a recommendation from the Joint Committee of the ACCESS

asset pool:

1. agreeing or otherwise the appointment of an Operator and the terms of

upon which the Operator is to be appointed.

2. agreeing or otherwise the extension or termination of an operator agreement and the appropriate arrangements to replace an Operator Agreement on its termination.

* + Determining proposed changes to the Inter-Authority Agreement.

Membership breakdown of the Pension Committee

| Representing | Number of Representatives | Term of Office | Method of Appointment |
| --- | --- | --- | --- |
| West Northamptonshire Council (the administering authority) | 7 | 4 years from Council election | Determined by West Northamptonshire Council. |
| North Northamptonshire Council | 2 | 4 years | Determined by North Northamptonshire Council. |
| All other employers | 2 | 4 years | Nominations to be determined by eligible employers. Details of the selection process to be determined by Chair. |
| Active Scheme Members | 1 | 4 years | Determined by Unison. Where Unison fails to nominate a representative for any period of 6 months or more, nominations will be requested from all eligible active members and a representative will be picked following interviews. Details of process to be agreed by the Chair. |
| Deferred and Pensioner Members | 1 | 4 years | Determined by Unison. Where Unison fails to nominate a representative for any period of 6 months or more, nominations will be requested from all eligible active members and a representative will be picked following interviews. Details of process to be agreed by the Chair. |
| Total | 13 |  |  |

Investment Sub-Committee

Role and Function

The Investment Sub-Committee undertake the day to day management of the Fund’s investments through implementing the investment strategy, reviewing and monitoring the asset allocation and appointing and reviewing the performance of investment managers outside of the ACCESS asset pool.

Membership, Chairing and Quorum

| Number of Members | 7 |
| --- | --- |
| Chairm and Vice Chair’s Term of Office | The Chair and Vice Chair of the Board shall also be the Chair and Vice Chair of the Investment Sub-Committee. |
| Substitute Members Permitted | Designated substitutes only due to the skills and knowledge requirements. |
| Political balance rules apply | Yes, within West Northamptonshire membership. |
| Restrictions on Membership | Representatives must be derived from the membership of the Pension Committee. |
| Quorum | 4. |
| Number of ordinary meetings per Council year | A minimum of 4. |
| Voting rights | All representatives have equal voting rights. |
| Training requirements | Members may not take part on the meetings of the Investment Sub-Committee unless they are committed to the skills and knowledge requirements set out by the Chair. |

Terms of Reference

* Authority to implement the Fund’s investment strategy including setting benchmarks and targets for the Fund’s investment managers and reviewing performance against those benchmarks.
* Authority to review and maintain the asset allocation of the Fund within parameters agreed with the Pension Committee.
* Authority to appoint and terminate investment managers to the Fund, including through divestment from holdings within the ACCESS asset pool, and to monitor the performance of investment managers leading to review and decisions on termination where necessary.
* Authority to appoint and monitor and where necessary terminate external advisors and service providers solely relating to investment matters, for example, the Fund Custodian, independent investment advisers, and investment consultants.
* Authority to monitor the risks inherent in the Fund’s investment strategy in relation to the Fund’s funding level.
* Authority to monitor and review:
  + Legislative, financial and economic changes relating to investments and their potential impact on the Fund;
  + The investment management fees paid by the Fund and to implement any actions deemed necessary;
  + The transactions costs incurred by the Fund across its investment mandates and raise relevant issues and concerns with the investment providers as necessary;
  + The investment provider’s adoption of responsible investment considerations, including carbon benchmarking, corporate governance matters and a review of compliance with the UK Stewardship Code.
* Authority to receive reports from investment providers.
* Authority to undertake any task as delegated by the Pension Committee.
* Authority to refer any matter to the Pension Committee as they consider appropriate and to provide minutes and such other information as they may request from time to time.

Membership breakdown of the Investment Sub-Committee

| Representing | Number of Representatives | Term of Office | Method of Appointment |
| --- | --- | --- | --- |
| West Northamptonshire Council (the administering authority) | 4 | 4 years from Council election | Determined by West Northamptonshire Council. |
| North Northamptonshire Council | 1 | 4 years from Council election | Determined by West Northamptonshire Council. |
| All other employers | 1 | 4 years | Determined by non-West Northamptonshire Council employer representatives on the Committee. Details of process to be agreed by the Chair. |
| Scheme Members | 1 | 4 years | Determined by Unison. Where Unison fails to nominate a representative for any period of 6 months or more, nominations will be requested from all eligible active members and a representative will be picked following interviews. Details of process to be agreed by the Chair. |
| Total | 7 |  |  |

The Local Pension Board

The administering authority (West Northamptonshire Council) as scheme manager under Section 4 of the Public Service Pensions Act 2013 is required to establish a Local Pension Board in accordance with Section 5 of that Act and under Regulation 106 of the Local Government Pension Scheme Regulations 2013 (as amended).

The Board is independent of the Pension Committee and is not a committee constituted under Section 101 of the Local Government Act 1972 and therefore no general duties, responsibilities or powers assigned to this such committees, sub-committees or officers under the constitution, standing orders or scheme of delegation of the administering authority apply to the Board unless expressly stated.

Role and Function

The role of the Local Pension Board is to assist the administering authority (West Northamptonshire Council) in its role as scheme manager of the Northamptonshire Local Government Pension Scheme (LGPS). This covers all aspects of governance and administration of the LGPS, including funding and investments. The Local Pension Board’s responsibilities are:

To assist the administering authority in securing compliance with:

* the Local Government Pension Scheme Regulations 2013;
* other legislation relating to the governance and administration of the LGPS; and
* the requirements imposed by the Pensions Regulator in relation to the LGPS; and
* To ensure the effective and efficient governance and administration of the LGPS;

Membership, Chairing and Quorum

All Local Pension Board members shall have the right to vote in meetings.

The Local Pension Board shall meet a minimum of four times a year. The date, hour and place of meetings shall be fixed by the Board. The Chair may call additional meetings if necessary. Quorum shall be four Local Pension Board members, provided that the employer and member sides are both represented.

No business requiring a formal resolution shall be transacted at any meeting of the Local Pension Board unless the meeting is quorate. If it arises during the course of a meeting that a quorum is no longer present, the Chair shall either suspend business until a quorum is re-established or declare the meeting at an end and arrange for the completion of the agenda at the next meeting or at a special meeting. Only previously designated substitutes are permitted to attend due to the skills and knowledge requirements of Local Pension Board representatives.

The Chair and Vice-Chair of the Local Pension Board shall be elected by the Board at its annual meeting. The normal term of office for the Chair and Vice-Chair of the Local Pension Board shall be one year, subject to earlier removal by vote of the Local Pension Board.

Members may not be permitted to take part in meetings of the Local Pension Board unless they have complied with the training requirements as set out in the Public Services Pensions Act and in the CIPFA Skills and Knowledge requirements for Local Pension Board representatives.

Terms of Reference

The first core function of the Board is to assist the administering authority in securing compliance with the Regulations, any other legislation relating to the governance and administration of the Scheme, and requirements imposed by the Pensions Regulator in relation to the Scheme. Within this extent of this core function the Board may determine the areas it wishes to consider including but not restricted to:

* Review regular compliance monitoring reports which shall include reports to and decisions made under the Regulations by the Committee.
* Review management, administrative and governance processes and procedures in order to ensure they remain compliant with the Regulations, relevant legislation and in particular the Pension Regulator’s Code of Practice.
* Review the compliance of scheme employers with their duties under the Regulations and relevant legislation.
* Assist with the development of and continually review such documentation as is required by the Regulations including the Governance Compliance Statement, Funding Strategy Statement and Investment Strategy Statement.
* Assist with the development of and continually review scheme member and employer communications as required by the Regulations and relevant legislation.
* Monitor complaints and performance on the administration and governance of the scheme.
* Review the implementation of revised policies and procedures following changes to the Scheme.
* Review the outcome of internal and external audit reports.
* Review draft accounts and Fund annual report.
* Review the compliance of particular cases, projects or process on request of the Committee.
* Any other area within the statement of purpose (i.e. assisting the Administering Authority) the Board deems appropriate.
* The second core function of the Board is to ensure the effective and efficient governance and administration of the Scheme. Within this extent of this core function the Board may determine the areas it wishes to consider including but not restricted to:
* Assist with the development of improved customer services.
* Monitor performance of administration governance and investments against key performance targets and indicators.
* Monitor internal and external audit reports.
* Review the risk register as it relates to the scheme manager function of the authority.
* Assist with the development of improved management, administration and governance structures and policies.
* Review the outcome of actuarial reporting and valuations.
* Assist in the development and monitoring of process improvements on request of Committee.
* Any other area to ensuring effective and efficient governance of the scheme the Board deems appropriate.

Membership breakdown of the Local Pension Board

| Representatives | Number of seats | Term of appointment | Method of appointment |
| --- | --- | --- | --- |
| Scheme Employers | 3 | 4 years | One councillor representative determined by West Northamptonshire Council.  One councillor representative determined by North Northamptonshire Council.  One representative of any other Scheme Employer that participates in the Northamptonshire Pension Fund appointed via an open selection process. |
| Scheme Members | 3 | 4 years | Three representatives appointed via an open selection process. Any trade union members so appointed will represent Scheme Members. |

The Joint Committee (of the ACCESS asset pool)

Role and Function

The Joint Committee is the formal decision making body within the ACCESS asset pool. The Joint Committee has been appointed by the 11 administering authorities under s102 of the Local Government Act 1972, with delegated authority from the Full Council of each administering authority within the pool to be responsible for ongoing contract management and budget management in relation to the pooling of LGPS pension fund assets. The Joint Committee is supported by the Officer Working Group and the ACCESS Support Unit. Each administering authority within the ACCESS asset pool has signed and is bound by the terms of an Inter-Authority Agreement.

Membership, Chairing and Quorum

Each Council may appoint a substitute. Any such substitute must either meet the eligibility requirements or be an elected councillor of another council and serving as a member of the committee of a Council which discharges the functions of that Council as pension administering authority (established under Section 101 of the Local Government Act 1972).

The Joint Committee meet at least four times each year.

The quorum of a meeting is at least 8 members who are entitled to attend and vote.

Each elected Member has one vote.

The Joint Committee shall invite Observers from the local pensions boards appointed under section 5 of the Public Service Pensions Act 2013 from each of the Councils to attend meetings of the Joint Committee on such basis as it thinks fit, which shall be reviewed by the Joint Committee from time to time.

*(Kent County Council provides secretariat support to the Joint Committee and publishes electronic copies of agenda and unrestricted public items on their website).*

Terms of Reference (as detailed in the Inter-Authority Agreement).

Part 1 – Operating the Pool and taking advice

* The Joint Committee (JC) shall consult with and consider the advice of the Section 151 Officer Group (and, where requested, the Monitoring Officers and from appropriate professional advisers) in discharging its functions, recording, if appropriate, where such advice is not followed and the rationale for not doing so. It may decide to procure such professional advisers on such terms as it thinks fit. Accordingly, any procurement of advisers must comply with the constitution of the Council designated to undertake the procurement and that Council will enter into a contract with the appointed adviser on behalf of the Councils.
* The JC shall decide which functions shall be performed by the ACCESS Support Unit (ASU).
* The JC shall at all times have regards to the ACCESS Pool’s principles of governing and collaboration.

Part 2 – Functions in relation to the Operator(s)

* Specifying Operator services – Deciding, in consultation with the Councils, the specification of Services and functions that each Operator will be required to deliver including the sub-funds and classes of investments required to enable each Council to execute its investment strategy.
* Procuring an Operator – Agreeing the method and process for the procurement and selection of one of more Operators.
* Appointing an Operator –Making a recommendation to the Councils as to the identity of each Operator and the terms upon which each Operator is to be appointed.
* Reviewing the Performance of an Operator – Keeping the performance of each Operator under review and making arrangements to ensure that the JC is provided with regular and sufficient reports from the ASU to enable it to do so including but not limited to:
  + The performance of an Operator against its contractual requirements and any other performance measures such as the Service Level Agreement and Key Performance Indicators and officer recommendations on any remedial action;
  + Sub-fund investment performance;
  + Investment and operational costs including the annual review of investment manager costs;
  + Performance against the strategic business plan agreed by the Councils.
* Managing the Operator(s) – the JC shall:
  + Make recommendations to the Councils about the termination or extension of the Operator Agreement(s)
  + Make decisions about any other action to be taken to manage an Operator Agreement including the giving of any instruction or the making of any recommendation to the relevant Operator including but not restricted to recommendations on investment managers (with any regulatory constraints that may apply); and
  + Make recommendations to the Councils about appropriate arrangements to replace an Operator Agreement on its termination.

Part 3 – Functions in relation to management of Pool Assets

* The JC shall make recommendations to the Councils on the strategic plan for transition of assets that are to become Pool Assets.

Part 4 – Functions Concerning Pool Aligned Assets

* The JC shall make recommendations to the Councils about Pool Aligned Assets in accordance with this Agreement or any other delegation to the JC by the Councils.
* Specifying services of Pool Aligned Assets Provider(s) – Deciding, in consultation with the Councils, the specification of Services which any Pool Aligned Assets Provider will be required to deliver including the sub-funds and classes of investments required to enable each Council to execute its investment strategy.
* Procuring a Pool Aligned Assets Provider – Agreeing the method of and process for the procurement and selection of one or more Pool Aligned Assets Providers.
* Appointing Pool Aligned Assets Provider – Making a recommendation to the Councils as to the identity of each Pool Aligned Assets Provider and the terms upon which each Pool Aligned Assets Provider is to be appointed.
* Reviewing the Performance of a Pool Aligned Assets Provider – Keeping the performance of each Pool Aligned Assets Provider under review and making arrangements to ensure that the JC is provided with regular and sufficient reports from the ASU to enable it do so including but not limited to:
  + The performance of the Pool Aligned Assets Provider against its contractual requirements and any other performance measures such as any Service Level Agreement and Key Performance Indicators and office recommendations on any remedial action;
  + Investment performance of the Pool Aligned Assets Vehicle(s) or sub-funds, as appropriate;
  + Performance against the strategic business plan agreed by the Councils.

Part 5 – Functions Concerning Business Planning and Budget

* Having taken account of any advice from the Section 151 Officers Group (or, where relevant, recording the rationale for not following such advice), the JC shall:
  + Make recommendations to the Councils about the annual strategic business plan for the Pool;
  + Determine the budget necessary to implement that plan and meet the expenses of undertaking the Specified Functions (insofar as they will not be met by individual transaction costs paid by the Councils to the Operator) in accordance with Schedule 5 (Cost Sharing) of the Inter-Authority Agreement.
* Keep the structure created by this agreement under review from time to time and make recommendations to the Councils about:
  + The future of the pool
  + Any changes in Inter-Authority Agreement
  + The respective merits of continuing to procure operator services by means of a third party or by creation of an operator owned by the Councils.

Part 6 – Functions Concerning Communications

* The JC may agree a protocol for communications in respect of the Pool with third parties, including the LGPS Scheme Advisory Board, other LGPS administering authorities, press and relevant Government departments.

Part 7 – Review of this Agreement

* The JC is required to undertake a review of this agreement:
  + To be completed 18 months before the expiry of each and every Operator Agreement, including as a result of the exercise of any option to terminate an Operator Agreement;
  + Whenever a Council gives notice of withdrawal under clause 12 (Withdrawal from Agreement) of the Inter-Authority Agreement; or
  + At such times as a Council may request under Clause 11 (Variation of Agreement) of the Inter-Authority Agreement.

**Chief Finance Officer (Section 151 Officer)**

Management and administration of the Local Government Pension Scheme

Authority to maintain West Northamptonshire Council’s responsibility for the management and administration of the Local Government Pension Scheme Regulations with regard to overriding legislation and guidance including statutory guidance, including the exercise of the administering authority’s discretions.

(Further delegations to the Head of Pensions can be found in the administering authority’s discretions or within individual policy or strategy documents published on the Pension Fund’s website as approved by the Pension Committee).

Membership of the ACCESS Asset Pool Section 151 Officers Group

In relation to the Joint Committee (JC), a s102 committee of the Local Government Act 1972, of the ACCESS Asset Pool, the Section151 Officer shall be bound by the terms of reference for the Section 151 Officer Group as detailed in the Inter-Authority Agreement:

Part 1 – Governing Principles

* The Section 151 Officers will co-operate to support the activities of the Pool in providing advice to or in consultation with the JC and they shall always act in line with the Governing Principle and Principles of Collaboration as set out in the Inter-Authority Agreement except to the extent that it is inconsistent with the discharge of their personal statutory duties.

Part 2 - Functions in relation to the Pool

* In response to decisions made by the JC, the Section 151 Officers shall (in addition and without prejudice to their existing statutory responsibilities in relation to the proper administration of the financial affairs of their own Councils) ensure the appropriate resourcing, support, advice and facilitation to the JC including, without limitation, in the following ways:

Discharging Section 151 Officer Functions

* + Staffing and Resourcing: in relation to the provision of staff and resources to assist the JC in the exercise of its functions under this Agreement.
  + Cost Sharing: in accordance with any local arrangements within their Councils, ensuring that their Councils’ share of costs is provided to the relevant parties, whether under the business plan, budget or otherwise under Schedule 5 from time to time.
  + Pool Aligned Assets: providing the JC, the ASU (ACCESS Support Unit) and any other relevant staff resources with such support as is reasonably required to engage with Pool Aligned Assets Providers.

Advising the Joint Committee

* + Budget and Business Planning: making recommendations to the JC on budget and business plan matters, following input from the ASU in accordance with Schedule 5 of the Inter-Authority Agreement (Cost Sharing).
  + Reviewing and advising on budget variations throughout each financial year.
  + Risk and Performance: advising the JC on the identification of, and mitigation of any risk to the operation or success of the Pool.
  + Host Authority and Procurement Lead Authority Roles: making recommendations to the JC regarding the Host Authority and Procurement Lead Authority roles from time to time as necessary.
  + Amendments to the Inter-Authority Agreement: reviewing, in consultation with their respective Councils’ Monitoring Officers, any material changes to the Inter-Authority Agreement, in accordance with provisions of clause 11 of the Inter-Authority Agreement (Variation of Agreement).

Part 3 – Working arrangements and meetings

* The Section 151 Officers Group shall express its advice and decisions by as majority of those voting on a particular issue. Decisions may be made by email circulation, in a meeting (which may be conducted remotely) of which proper notice has been given.
* Each Council shall be represented at meetings of the Group by its Section 151 Officer, or his or her deputy or nominee.
* The Section 151 Officers Group may make any such working arrangements as they deem necessary. Any such arrangements shall be recorded in writing in a minute of a meeting of the group.
* Minutes of a meeting of the Section 151 Officers Group shall be deposited with the Host Authority and made available to the Monitoring Officer, Section 151 Officer or Head of Paid Service of any Council.

Governance Compliance Statement

This section sets out the extent to which Northamptonshire Pension Fund governance arrangements are compliant with guidance issued by the Secretary of State for Communities and Local Government;

| Principle | **Not Compliant** | **Partially Compliant** | **Fully Compliant** |
| --- | --- | --- | --- |
| 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) 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. |  |  | 🗸 |
| (c) that where a secondary committee or panel has been established, the structure ensures effective communication across both levels. |  |  | 🗸 |
| (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. 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) independent professional observers |  |  | 🗸 |
| (iv) expert advisers |  |  | 🗸 |
| (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. |  |  | 🗸 |
| C. Selection and role of lay members |  |  |  |
| (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 |  |  | 🗸 |
| (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. |  |  | 🗸 |
| D. Voting |  |  |  |
| (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. |  |  | 🗸 |
| 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. |  |  | 🗸 |
| (b) that where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form or secondary forum. |  |  | 🗸 |
| F. Meetings (frequency/quorum) |  |  |  |
| (a) that the Administering Authority’s main committee or committees meet at least quarterly. |  |  | 🗸 |
| (b) that an Administering Authority’s secondary committee of panel meet at least twice a year and is synchronised with the dates when the main committee sits. |  |  | 🗸 |
| (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 be represented. |  |  | N/A |
| G. Access |  |  |  |
| (a) that subject to any rules in the councils 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. |  |  | 🗸 |
| H. Scope |  |  |  |
| (a) that administering authorities have taken steps to bring the wider scheme issues within the scope of their governance arrangements. |  |  | 🗸 |
| 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. |  |  | 🗸 |