

# Essex Pension Fund

Knowledge and Skills Training Strategy

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# 1 Introduction

This is the Training Strategy for the Essex Pension Fund (“the EPF”).

It sets out the strategy to be considered by the EPF Strategy Board (“the PSB”), and subsequently put to the EPF Advisory Board (“the PAB”) for their consideration, concerning the training and development of the:

- members of the PSB;
- members of the PAB;
- officers of the EPF responsible for the management of the EPF (the “Officers”).

The training strategy is established to aid the PSB and the PAB members in performing and developing personally in their individual roles and to equip them with the necessary skills and knowledge to challenge and act effectively within the decision making responsibility put upon them. A code of practice and a framework of knowledge and skills have been developed by CIPFA which Local Government Pension Scheme (LGPS) funds are expected to sign up to.

The objective of the CIPFA knowledge and skills framework is to determine and set out the knowledge and skills sufficient to enable the effective analysis and challenge of decisions made by officers and advisers to the s101 Pension Committee. In relation to the EPF, this is the PSB.

Essex County Council set up the PAB as its Local Pension Board as it was required to by the Public Service Pensions Act 2013. The same Act also amended The Pensions Act 2004 requiring the Pensions Regulator to issue a code of practice relating to the requirements of the knowledge and understanding of Board members i.e. members of the PAB. Guidance covering the knowledge and understanding of local pension boards in the LGPS has also been issued by the Shadow Scheme Advisory Board (SSAB) in January 2015. Although this has not been designated as statutory guidance it should be acknowledged as good guidance to which the PAB should refer to. The guidance for local pension boards issued by the SSAB is designed to assist the individual PAB members in undertaking their role to assist the Scheme Manager (the Essex County Council) in the effective governance and administration of the LGPS.

The training necessary to achieve the additional knowledge and skills will be contained in the appropriate training plan(s); an example for the PAB is given in the appendix.

## 1.1 Strategy Objectives

The EPF objectives relating to knowledge and skills are to:

- Ensure the EPF is managed and its services delivered by people who have the appropriate knowledge and expertise;
- Ensure the EPF is effectively governed and administered;
- Act with integrity and be accountable to our stakeholders for our decisions, ensuring they are robust and are well based, and regulatory requirements or guidance of the Pensions Regulator, the Scheme Advisory Board and the Secretary of State for Communities and Local Government are met.

To achieve these objectives –

**The PSB Members** require an understanding of:

- Their responsibilities as delegated to them by Essex County Council as an administering authority of an LGPS fund;

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- The fundamental requirements relating to pension fund investments;
- The operation and administration of the EPF;
- Controlling and monitoring the funding level; and
- Taking effective decisions on the management of the EPF.

**PAB members** must be conversant with –

- The relevant LGPS Regulations and any other regulations governing the LGPS;
- Any document recording policy about the administration of the EPF;

and have knowledge and understanding of:

- The law relating to pensions; and
- Such other matters as may be prescribed.

To assist in achieving these objectives, the EPF will aim for full compliance with the CIPFA Knowledge and Skills Framework and Code of Practice to meet the skill set within that Framework. Attention will also be given to the guidance issued by the Scheme Advisory Board, the Pensions Regulator and guidance issued by the Secretary of State. So far as is possible, targeted training will also be provided that is timely and directly relevant to the PSB's and PAB's activities as set out in the EPF's 3-year business plan. For example, funding strategy training will be given at the PSB meeting that discusses the Funding Strategy Statement.

Existing PSB and PAB members will have received and new members will receive induction training to cover the role of a local pension board and to understand the duties and obligations of an LGPS administering authority, including funding and investment matters.

All those with decision making responsibility in relation to LGPS pension matters as well as PAB members will:

- have their knowledge measured and assessed;
- receive appropriate training to fill any knowledge gaps identified; and
- seek to maintain their knowledge.

### **1.2 Application of the training strategy**

This training strategy will apply to all PSB Members and representatives with a role on the PSB and to all the PAB members. Other officers involved in the management and administration of the EPF will have their own personal training plans and career development objectives.

### **1.3 Purpose of training**

The purpose of training is to:

- Equip people with the necessary skills and knowledge to be competent in their role and ensure that knowledge and skills are recorded, assessed and maintained;
- Provide those with responsibility for governing of the EPF to evaluate the information they receive and effectively challenge it where appropriate;
- Support effective and robust decision making;
- Allow members of the PSB and PAB to recognise and manage potential conflicts of interest;
- Meet the required needs in relation to the EPF's objectives.

**1.4 Summary**

This training strategy:

- Assists in meeting the EPF’s objectives;
- Meets the business plan;
- Will assist in achieving delivery of effective governance and management;
- Will equip those responsible with appropriate knowledge and skills;
- Promote ongoing development of the decision makers;
- Lead to demonstrating compliance with the CIPFA Knowledge and Skills Framework;
- Lead to demonstrating compliance with statutory requirements and appropriate consideration of associated guidance.

**2 Meeting the business plan**

**2.1 Timely and relevant**

There will be times in the year when different circumstances will require specific training. For example, funding strategy training can be provided at the PSB meeting that discusses the Funding Strategy Statement.

It is vital that training is relevant to any skills gap or business need and training should be delivered in a manner that fits with the business plan.

The training plan will therefore be regularly reviewed to ensure that training will be delivered where necessary to meet immediate needs to fill knowledge gaps.

**3 Delivery of Training**

**3.1 Training resources**

Consideration will be given to various training resources available in delivering training to the PSB members, PAB members or officers in order to achieve efficiencies. These may include but are not restricted to:

For PSB and PAB members	For Officers
<ul style="list-style-type: none"> <li>• In-house*</li> <li>• Self-improvement and familiarisation with regulations and documents</li> <li>• The Pension Regulator’s e-learning programme</li> <li>• Attending courses, seminars and external events</li> <li>• Internally developed training days and pre/post PSB/PAB sessions*</li> <li>• Shared training with other funds or frameworks*</li> <li>• Regular updates from officers and/or advisers*</li> <li>• Circulated reading material</li> </ul>	<ul style="list-style-type: none"> <li>• Desktop / work based training</li> <li>• Attending courses, seminars and external events</li> <li>• Training for qualifications from recognised professional bodies (e.g. CIPFA, CIPP, PMI)</li> <li>• Internally developed sessions</li> <li>• Shared training with other funds or frameworks</li> <li>• Circulated reading material</li> </ul>

\*These may be shared training events for PSB and PAB members

### 3.2 Training Plans

To be effective, training must be recognised as a continual process and will be centred on 3 key points

- The individual;
- The general pensions environment;
- Coping with change and hot topics.

Training plans will be developed at least on an annual basis. These will be updated as required taking account of the identification of any knowledge gaps, changes in legislation, EPF events (e.g. the triennial valuation) and receipt of updated guidance.

Induction training will be provided for all new officers with pension responsibilities, new members of the PSB and PAB. This will involve covering the requirements of the training strategy alongside guidance and information on the requirements of their roles.

### 3.3 External Events

A log of potential external events which may count towards credits will be maintained on an ongoing basis by the Head of EPF. This will be updated as information on events becomes available and will be provided at PSB and PAB meetings.

After attendance at an external event, PSB and PAB members will be expected to provide verbal feedback at their following PSB/PAB meeting either during the meeting or to an officer covering the following points:

- Their view on the value of the event and the merit, if any, of attendance;
- A summary of the key learning points gained from attending the event; and
- Recommendations of any subject matters at the event in relation to which training would be beneficial to other PSB/PAB members.

Officers attending external events will be expected to report to their direct line manager with feedback covering the following points:

- Their view on the value of the event and the merit, if any, of attendance;
- A summary of the key learning points gained from attending the event; and
- Recommendations of any subject matters at the event in relation to which training would be beneficial to other officers.

## 4 On-going development

### 4.1 Maintaining knowledge

In addition to undertaking on-going assessment in order to measure knowledge and skills against the CIPFA requirements and identify knowledge gaps, Officers, PSB and PAB members are expected to maintain their knowledge of on-going developments and issues through attendance at external events and seminars.

Appropriate attendance at events for representatives of the PSB and PAB will be agreed by the appropriate chairman. Attendance at events for officers will be agreed via their relevant line manager.

A list of known future events and seminars will be presented at each PSB/PAB meeting.

The Head of EPF will decide an appropriate level of credits for attendance at an event depending on the type of event, its content and relevance to knowledge maintenance but based on the guide given in section 5 below. The level of credit may then be re-evaluated when receiving feedback (see 3.3 above).

In any event, attendance at events/seminars (which may include some internal training sessions) that are not direct training courses focussed on the CIPFA Knowledge Skills Framework or issued guidance but enhance and improve related on-going and emerging pension knowledge will count as one credit for each session of up to a half day.

Owing to the changing world of pensions, it will also be necessary to have ad hoc training on emerging issues or on a specific subject on which a decision is to be made by the PSB in the near future or is subject to review by the PAB. These will also count as credits in maintaining knowledge.

## 5 Recording Training

### 5.1 Training credits

As a measure of training given or knowledge level, PSB and PAB members are expected to have a minimum level of training credits. Credits will be awarded in recognition of attendance at training events, successful completion of recognised training assessment or for attendance at relevant industry events or seminars. This approach recognises that members of the PSB and PAB may have different learning styles, while at the same time requiring that an appropriate core level of knowledge is attained.

Credits will be awarded in accordance with the following guide:

Method of attaining credit	Number of credits awarded
Completion of a single module of the Pensions Regulators e-learning toolkit. There are 7 modules in total	1 credit per module passed and valid for 2 years
Attendance at a training event organised by the Essex Pension Fund. This would typically be held as part of a full PSB or PAB meeting.	1 credit per session
Successful completion of a knowledge assessment following a training event.	1 credit per assessment passed and valid for 2 years (a pass being awarded for achieving at least 2/3rds of the available marks)
Attendance at an approved conference, seminar or external training event	2 credit for a full day's attendance 1 credit for a half day's attendance

### 5.2 Number of credits required

Members of the PSB and PAB will be expected to accumulate 21 credits over a rolling 2 year period. 21 credits can be obtained by, for example, completing the Pension Regulator's e-learning toolkit, attending 7 EPF training events and passing 4 knowledge assessments.

These will be measured and monitored by the Head of EPF over rolling 2-year periods ending at the relevant prior meeting and recorded. The number of credits is set at a level that encourages both attendance at training sessions and assessment.

It is acknowledged that where an individual is new to the role there will be a lead-in period before the member will be expected to demonstrate the full range of knowledge and skills. However, in any event, the scoring of credits will be reset to zero as at 1 April 2015 following the introduction of the new governance arrangements.

### 5.3 Scorecard

For the purposes of disclosing the level of knowledge and understanding of the PSB and PAB through the scorecard mechanism at PSB meetings, the following will be recorded separately for the PSB and PAB:

- Total number of credits possible in the period in question i.e. the last 2 years starting at 1 April 2015 or later for a new member joining after that date, assuming one assessment takes place per meeting cycle;
- Total number of credits achieved in the same period.

The latter score will be flagged as green if this represents at least 90% of the potential target, amber for between 60% and 89% (inclusive) and red if below 60%.

Separately, the Head of EPF will hold a record of each individual's training credits split between attendance and assessment and will be shared with the chairman of the relevant PSB/PAB from time to time (see also section 8 below).

## 6 CIPFA Requirements

### 6.1 CIPFA Knowledge & Skills Framework

In January 2010 CIPFA launched technical guidance for Elected Representatives on s101 pension committees and non-executives in the public sector within a knowledge and skills framework. The framework covers six areas of knowledge identified as the core requirements:

- Pensions legislative and governance context;
- Pension accounting and auditing standards;
- Financial services procurement and relationship development;
- Investment performance and risk management;
- Financial markets and products knowledge; and
- Actuarial methods, standards and practice.

The Knowledge and Skills Framework sets the skills required for those responsible for pension scheme financial management and decision making under each of the above areas in relation to understanding and awareness of regulations, workings and risk in managing LGPS funds.

### 6.2 Local Pension Boards: A Technical Knowledge and Skills Framework

In August 2015 CIPFA extended the Knowledge and Skills Framework to specifically include members of local pension boards, albeit there exists an overlap with the original framework. The framework identifies the following areas as being key to the understanding of local pension board members;

- Pensions Legislation;
- Public Sector Pensions Governance;
- Pensions Administration;
- Pensions Accounting and Auditing Standards;
- Pensions Services Procurement and Relationship Management;

- Investment Performance and Risk Management;
- Financial markets and product knowledge;
- Actuarial methods, standards and practices.

### **6.3 CIPFA's Code of Practice on Public Sector Pensions Finance, Knowledge and Skills (the "Code of Practice")**

First published in October 2011 and redrafted in July 2013, CIPFA's Code of Practice embeds the requirements for the adequacy, acquisition, retention and maintenance of appropriate knowledge and skills required. It recommends (amongst other things) that LGPS administering authorities:

- formally adopt the CIPFA Knowledge and Skills Framework in its knowledge and skills statement;
- ensure the appropriate policies and procedures are put in place to meet the requirements of the Framework (or an alternative training programme);
- publicly report how these arrangements have been put into practice each year.

The PSB fully supports the intentions behind CIPFA's Code of Practice and has agreed to formally adopt its principles. This training strategy formally sets out the arrangements the EPF will take in order to comply with the principles of the CIPFA Knowledge and Skills Code of Practice.

## **7 Guidance from the Scheme Advisory Board**

### **7.1 General Principles**

The Scheme Advisory Board has taken note of the regulatory requirements and the principles of the Pension Regulator's code of practice and in January 2015 published Guidance for administering authorities to support them in establishing their local pension board. The Guidance includes a section designed to help local pension board members to understand their knowledge and understanding obligations.

Knowledge and understanding must be considered in the light of the role of a local pension board and Essex County Council will make appropriate training available to assist and support PAB members in undertaking their role.

### **7.2 PSB members**

Although the CIPFA knowledge and skills framework complements the code of practice that should be adopted by administering authorities there is no legal requirement for knowledge and understanding for members of a s101 pension committee. However, the view of the EPF is that members of the PSB should have no less a degree of knowledge and skills than those required in legislation by the PAB. Sections 7.3 to 7.5 below are therefore still relevant in the consideration of the training needs of PSB members.

### **7.3 Degree of Knowledge and Understanding**

The role of the PAB is to assist the scheme manager i.e. the administering authority. To fulfil this role, PAB members should have sufficient knowledge and understanding to challenge failure to comply with regulations, any other legislation or professional advice relating to the governance and administration of the LGPS and/or statutory guidance or codes of practice.

PAB members should understand the regulatory structure of the LGPS and the documentary recording of policies around the administration of the EPF in enough detail to know where they are relevant and where it will apply.

#### 7.4 Acquiring, Reviewing and Updating Knowledge and Understanding

PAB members should commit sufficient time in their learning and development and be aware of their responsibilities immediately they take up their position. The EPF will therefore provide induction training for all new PAB members [and this was carried out at their meeting held on 17 July 2015].

#### 7.5 Flexibility

It is recognised that a rigid training plan can frustrate knowledge attainment when too inflexible to reflect a change in pension law or new responsibilities required of PAB members. Learning programmes will therefore be flexible to deliver the appropriate level of detail required.

## 8 The Pensions Regulator

### 8.1 E-learning toolkit

The Regulator has developed an on line tool designed to help those running public service schemes to understand the governance and administration requirements in the public service schemes code of practice. The toolkit is an easy to use resource and covers 7 short modules. These are:

- Conflicts of Interests;
- Managing Risk and Internal Controls;
- Maintaining Accurate Member Data;
- Maintaining Member Contributions;
- Providing Information to Members and Others;
- Resolving Internal Disputes;
- Reporting Breaches of the Law.

These modules are designed to apply to all public service schemes and are not LGPS specific. Completion of the toolkit will not in itself provide PAB members with all the information they require to fulfil their knowledge and skills obligations. It does however provide a good grounding in some general areas and all PAB members will be expected to complete the full 7 modules over time.

## 9 Training records and certification

### 9.1 Progress and achievement

Personalised training plans will be used to document and address any knowledge gaps and update areas of learning where required and assist in the acquisition of new areas of knowledge in the event of change.

Progress and achievement will be certificated at least on an annual basis individually to all PSB members, PAB members and officers. These will detail:

- The current assessment of an individual's acquired knowledge;
- Their progress against achieving the credits from other internal/external training or events; and
- All training courses and events attended by them to date.

## 10 Risk

### 10.1 Risk Management

The compliance and delivery of this training strategy is at risk in the event of –

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- Frequent changes in membership of the PSB or PAB;
- Poor individual commitment;
- Resources not being available;
- Poor standards of training;
- Inappropriate training plans.

These risks will be monitored by officers within the scope of this training strategy and be reported where appropriate.

## Appendix

### PAB Training Plan - example

#### Training plan –

##### General –

Due to the new nature of local pension boards it is unlikely that members will be experts in all areas for which they can assist the Scheme Manager. Training of PAB members must therefore be structured and relevant to ensure individuals have and maintain the necessary knowledge and understanding to effectively meet their legal obligations to assist the EPF.

In accordance with section 248A of the 2004 Act, every individual who is a member of a Local Pension Board must:

be conversant with:

- the rules of the LGPS, in other words the Regulations and other regulations governing the LGPS (including the Transitional Regulations, earlier regulations and the Investment Regulations); and
- any document recording policy about the administration of the Fund which is for the time being adopted in relation to the Fund, and

have knowledge and understanding of:

- the law relating to pensions; and
- such other matters as may be prescribed.

The legal requirement for knowledge and understanding for members of a Local Pension Board i.e. the PAB does not apply to members of a Pension Committee (i.e. PSB). However, the requirement serves as a useful benchmark for the knowledge and understanding that a member of the decision-making PSB should have.

Given the role of the PAB to assist the Administering Authority, members of the PAB should have sufficient knowledge and understanding to challenge any failure by the Administering Authority to comply with the Regulations and other legislation relating to the governance and administration of the LGPS (which should be interpreted as including the Regulations and other legislation relating to investment and funding matters) and/or any failure to meet the standards and expectations set out the Pensions Regulator's Code of Practice No. 14.

Regulation 107(2) of the Local Government Pension Scheme Regulations 2013 only requires employer and scheme member representatives to have the capacity to represent their respective community. However regulation 109 of the Regulations requires the administering authority to have regard to guidance issued by the Secretary of State in relation to local pension boards. Whilst the guidance on the creation and operation of local pension boards issued by the SSAB is not (as yet) statutory, such guidance must be held up to be good practice. This training plan will therefore be in line with the guidance.

## The Training Strategy

The EPF Knowledge and Skills Training Strategy sets out the fund's objectives and approach with regard to the knowledge and skills required by both the members of the PSB and the PAB.

## The training plan

With the training strategy in place it is important to have an induction training event in place for all new PAB members. The purpose of this should be to advise them of their roles and responsibilities and how this is different from that of the PSB. It is the opportunity to familiarise them with the role ahead and where information can be obtained and perhaps importantly their terms of reference and remit.

The induction day should also be used to introduce them to the training strategy and their training plan for the tenure of their membership. It is suggested the induction takes no longer than a half day.

The training should then as far as is possible be structured along with the business they are conducting. This will not be known until the local pension board has met on a number of occasions so it is necessary to put something in place at an early stage but can be flexible enough to be able to change according to requirements.

The induction training event was in fact carried out at the PAB's first meeting held on 17 July 2015.

The training plan was as follows –

### Induction half day to cover –

#### Why are we here?

- The background to LPBs (the PAB)
- The Public Service Pensions Act
- The LGPS Regulations

#### Your role

- How it differs from the PSB
- Non decision making
- Conduct and conflicts
- Reporting of breaches
- Assist the scheme manager
- Data protection

#### Your responsibilities

- Terms of reference
- Policies
- Reporting

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### **Your knowledge and skills**

- Put a strategy/plan in place
- Maintaining records
- Knowledge gaps and maintaining knowledge

The induction half day will then followed by further training events to cover the following modules:

#### **Module 1**

Introduction to documents and recording policies of the administration of the LGPS in the EPF

Advise attendees of (but not limited to)

- any scheme booklets and information and communication channels
- relevant policies of the EPF
- the policies and documents the EPF is required to have in place to satisfy LGPS regulations
- the risk register
- valuation reports
- annual report and accounts

#### **Module 2**

Background and understanding of the legislative framework of the LGPS and general pensions legislation applicable to the LGPS

This will look at subjects like–

- the difference between the public sector (LGPS) and private sector pension arrangements
- local authority law and how administering authorities are constituted
- overview of the LGPS and the raft of regulations
- other legislation that impacts on the LGPS and its administration

#### **Module 3**

The role and responsibility of the administering authority (Administration, Funding and Investment) and the roles and responsibilities of employers in the EPF

This module will cover –

- the membership and the benefit structure of the LGPS
- record keeping and internal controls
- IDRPs
- statements and reports and accounts
- reporting breaches
- valuations and cessations
- permitted and restricted investments

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- appointment and management of investment managers and custodians

**Module 4**

The role of advisers and key persons, key bodies connected to the LGPS

Explaining the role of key advisers and bodies such as –

- The Pensions Regulator
- Financial Services Authority
- HMRC
- Pensions Ombudsman
- the fund actuary
- auditors