

**Governance Policy and Compliance
Statement**
as at 16 December 2015

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Introduction

This Policy and Compliance Statement outlines the governance arrangements for the Essex Pension Fund, maintained by Essex County Council, as required by Regulation 55 of the Local Government Pension Scheme Regulations 2013 (“The Regulations”).

Under that provision all LGPS Funds in England and Wales are required to produce a Governance Compliance Statement, keep it under review, revise it following any material change in its delegation arrangements and publish it, following such consultation as it considers appropriate. The statement is required to set out:

- a. whether the administering authority delegates their function or part of their function in relation to maintaining a pension fund to a committee, a sub-committee or an officer of the authority;
- b. if they do 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 employing authorities (including authorities which are not 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;
- d. details of the terms, structure and operational procedures relating to the local pension board established under The Regulations.

Each administering authority is required to:

- a. keep the statement under review;
- b. make such revisions as are appropriate following a material change in respect of any of the matters mentioned in points a. to d., above; and
- c. if revisions are made, publish the statement as revised.

In reviewing and making revisions to the statement, the authority must consult such persons as it considers appropriate.

This Policy and Statement was made and approved by the Essex Pension Fund Board on 16 December 2015. There have been some changes to the governance arrangements since the previous Policy and Statement.

In 2013 the Public Service Pensions Act required that each public sector scheme establish a Pension Board. The subsequent amendments to The Regulations specify the role of the Board for LGPS funds. The Regulations require the creation of a Local Board to assist the scheme manager (in Essex Pension Fund’s case, The Essex Pension Fund Strategy Board and the Essex Pension Fund Investment Steering Committee):

- to secure compliance with the Local Government Pension Scheme (LGPS) regulations and any other legislation relating to the governance and administration of the LGPS;
- to secure compliance with requirements imposed in relation to the LGPS by the Pensions Regulator;
- in such other matters as the LGPS regulations may specify.
- secure the effective and efficient governance and administration of the LGPS for the Essex Pension Fund;
- provide the Scheme Manager with such information as it requires in order to ensure that any member of the Board or person to be appointed to the Board does not have a conflict of interest.

About The Essex Pension Fund

Under the Local Government Pension Scheme Regulations 2013, Essex County Council is required to maintain a pension fund (“the Fund”) for its employees and those of other Scheme Employers within its area.

Essex County Council therefore administers the Fund for its own employees and those of the 14 District/Borough/Unitary Councils and numerous other bodies. In total there are over 580 separate employing bodies in the Fund. The Fund excludes provision for teachers, fire-fighters and police officers, for whom separate arrangements exist but includes administrative and support staff for those organisations.

Benefits are prescribed by, and the Fund is invested in accordance with, the provisions of the following regulations under the Public Service Pensions Act 2013 (all as amended):

- Local Government Pension Scheme (LGPS) Transitional Provisions, Savings and Amendment Regulations 2014;
- Local Government Pension Scheme (LGPS) Regulations 2013;
- The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009

and other saved provisions from previous sets of LGPS regulations.

With effect from 1 April 2014 employee contributions have been banded according to employees’ annual pensionable pay. The rates payable vary from 5.5% to 12.5% of annual pensionable pay.

Membership Summary as 31 March 2015	
Active Members	50,965
Pensioner/Dependants	35,455
Deferred Members	44,038
Total	130,458

* Deferred pensioners are former active members who have chosen not to transfer their pension rights but retain their pension rights in the Essex Pension Fund until they are due for payment.

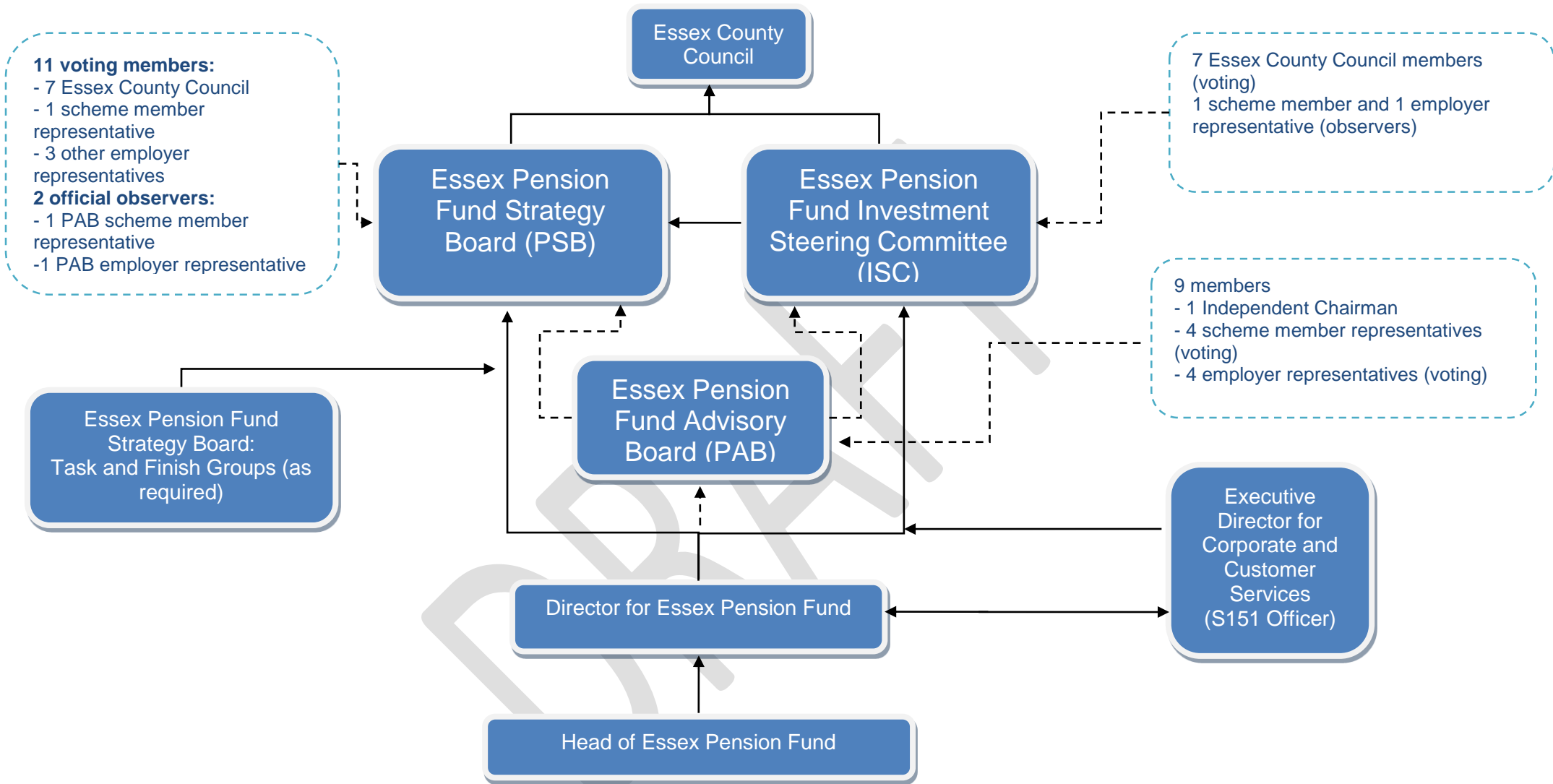
At the last triennial valuation of the Fund as at 31 March 2013 Fund assets were £3.958 billion, which represented 80% of the Fund's liabilities. Employers are responsible for paying employer contributions at rates determined by the fund actuary at each triennial valuation.

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Governance Structure

The Essex Pension Fund governance structure is illustrated below. This structure relates to the administering authority responsibilities only. Essex County Council is also an employer within the Essex Pension Fund. A separate governance structure and Scheme of Delegation is in place in relation to Essex County Council's employer responsibilities:

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Scheme of delegations for the Essex Pension Fund

Essex County Council (“the Council”) has delegated its functions in relation to the maintenance of the Essex Pension Fund as follows:

1. To the Essex Pension Fund Strategy Board (PSB) (formerly known as the Essex Pension Fund Board):

- i. To exercise on behalf of the Council all of the powers and duties of the Council in relation to its functions as Administering Authority of the Essex Pension Fund except where they have been specifically delegated by the Council to another Committee or to an officer. The delegation will include the following specific functions:
 - a. To monitor and oversee the work of the Investment Steering Committee through its quarterly reports.
 - b. To monitor the administration of the Pension Scheme, including compliance with The Regulations, to oversee the day to day administration and payment of pensions including the Internal Disputes Resolution Procedures. To ensure the Fund delivers best value and complies with best practice guidance where considered appropriate.
 - c. To exercise Pension Fund discretions on behalf of the Administering Authority.
 - d. To determine Pension Fund policy in regard to employer admission arrangements.
 - e. To determine the Pension Fund's Funding Strategy and approve its Funding Strategy Statement.
 - f. To receive periodic actuarial valuation reports from the Actuary.
 - g. To coordinate Administering Authority responses to consultations by Central Government, professional and other bodies.
 - h. To consider any views expressed by employing organisations and staff representatives.

2. To the Essex Pension Fund Investment Steering Committee (ISC):

- i. To approve and review annually the content of the Statement of Investment Principles.
- ii. To appoint and review Investment Managers, Custodian and Advisors.
- iii. To assess the quality and performance of each Investment Manager annually in conjunction with investment advisers and the Section 151 Officer.
- iv. To set the investment parameters within which the Investment Managers can operate and review these annually.
- v. To monitor compliance of the investment arrangements with the Statement of Investment Principles.
- vi. To assess the risks assumed by the Fund at a global level as well as on a manager by manager basis.

- vii. To approve and review the asset allocation benchmark for the Fund.
- viii. To submit quarterly reports on its activities to the Essex Pension Fund Board.
- ix. To approve the Fund's Treasury Management Strategy.

3. To the Executive Director for Corporate and Customer Services (S151 Officer):

- i. To act as the Council's officer appointed under section 151 of the Local Government Act 1972 and to make such decisions as are necessary for the proper administration of the Council's financial affairs.
- ii. To be the Proper Officer under Section 115 of the Local Government Act 1972.
- iii. To be responsible for all the Council's powers and duties with respect to pensions including the Essex Pension Fund and the Council's involvement with other pension schemes

Note 1: The Executive Director for Corporate and Customer Services is not empowered to change the managers of the Pension Fund unless the Chief Executive agrees following a recommendation from the ISC.

Note 2: The operational procedures related to these functions are carried out by the Essex Pension Fund.

4. To the Director for Essex Legal Services:

To act as the administering authority for the purposes of the pensions complaints procedure.

Under the Public Service Pensions Act 2013, the Essex Pension Fund's Local Pension Board is known as the Essex Pension Fund Advisory Board (PAB). The functions of the PAB are set out in its terms of reference and are summarised below:

The Essex Pension Fund Advisory Board

- i. To assist the Administering Authority:
 - a. to secure compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS;
 - b. to secure compliance with requirements imposed in relation to the LGPS by the Pensions Regulator (tPR).
- ii. To secure the effective and efficient governance and administration of the LGPS for the Essex Pension Fund ("EPF").
- iii. To help ensure that the EPF is managed and administered effectively and efficiently and complies with the tPR's Code of Practice (CoP –

“Governance and administration of public service pension schemes”)
No. 14.

- iv. To assist the Scheme Manager in this case the Administering Authority with such matters as the scheme regulations may specify.
- v. To be a “critical friend” to the PSB and the ISC.
- vii. To provide oversight of decisions made by the PSB to ensure that due process has been followed.
- viii. The Board may review any decision made by or on behalf of the Scheme Manager.
- ix. The Board will adopt a policy statement on reporting breaches identified under viii.
- x. At the invitation of the PSB, the Board may also undertake other tasks.
- xi. Appoint Observers to attend meetings of the PSB and the ISC.

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Board/Committee Representation

The Essex Pension Fund Strategy Board (PSB)

The Essex Fund Pension Strategy Board is composed as follows:

Representing	No	Term of Office	Comments
Essex County Council	7	until 2017 County Council Elections	
District/Borough Councils in Essex	1	4 years (from May 2015 until 2019 District/Borough Council elections)	Nominated by Essex Borough and District Leaders"/Chief Executives" Meeting
Unitary Councils in Essex	1	4 years (from May 2015 until 2019 Unitary Authority elections)	One from either Southend-on-Sea and Thurrock Councils
Scheme Members	1	4 years from date of appointment	Nominated by UNISON
Smaller Employing Bodies	1	2 years, from Employer Forum 2015 until Employer Forum 2017	To be nominated following voting by either eligible employers attending the Employer Forum or election process
Total	11		
PAB Employer representative (observer)	1	A review of the PAB is due to commence by October 2016 with any changes implemented by May 2017.	PAB Nomination
PAB Employee representative (observer)	1		PAB Nomination

All members of the Board have equal voting rights.

The Strategy Board is supported in the execution of its responsibilities by staff from the Authority's Pension Fund function as well as an Independent Governance and Administration Adviser and other advisers as considered necessary (e.g. the Fund Actuary).

The Strategy Board meets five times a year with one of the meetings set aside for consideration of Pension Fund strategy matters. Additional Task and Finish Groups can meet as necessary to consider and report to the Board on matters that require further consideration.

The Strategy Board also has a dedicated training plan which includes specific internal training sessions in order they may maintain an appropriate level of knowledge and skills to perform their role effectively.

The Essex Pension Fund Investment Steering Committee (ISC)

The Essex Pension Fund Investment Steering Committee is composed as follows:

Representing	No	Term of Office	Comments
Essex County Council (voting)	7	Until 2017 County Council Elections	
Total	7		
Employer representative (observer)	1	4 years (from May 2015 until 2019 District/Borough Council elections)	Nominated by Essex Borough and District Leaders"/Chief Executives" Meeting
Scheme Members (observer)	1	4 years from date of appointment	Nominated by UNISON,

The Investment Steering Committee is supported in the execution of its responsibilities by two investment advisers (one independent and one institutional) and staff from the Authority's Pension Fund function.

The Committee meets routinely on six occasions each year. Four of those meetings are primarily to meet with investment managers in order to review the performance of the investment managers against their benchmarks but two meetings each year in February and July are set aside for the consideration of ongoing investment strategy.

In addition special meetings of the Committee are held when required for the discharge of its functions in regard to such matters as the selection and appointment of investment managers.

The Essex Pension Fund Advisory Board (PAB)

The Essex Pension Fund Advisory Board is composed as follows:

Representing	No	Term of Office	Comments
Independent Chair (non-voting)	1	A review of the PAB is due to commence by October 2016 with any changes implemented by May 2017	
Essex County Council	1		
District/Borough Councils in Essex	1		Nominated by Essex Borough and District Leaders"/Chief Executives" Meeting
Unitary Councils in Essex	1		One from either Southend-on-Sea and Thurrock Councils
Smaller Employing Bodies	1		Essex Fire Authority
Scheme Members	3		2 deferred and 1 active member
Scheme Member	1		Nominated by UNISON
Total	9		

The Essex Pension Fund Advisory Board is appointed by Essex County Council as its Local Pensions Board in accordance with section 5 of the Public

Service Pensions Act 2013 and Part 3 of the Local Government Pension Scheme Regulations 2013.

The Essex Pension Fund Advisory Board has no delegated decision making ability, on behalf of Essex County Council.

With the exception of the Chair, who has no vote, all members of the Board have equal voting rights.

There are no substitute members.

The Pension Advisory Board is supported in the execution of its responsibilities by staff from the Authority's Pension Fund function as well as advisers to the fund such as the Independent Governance and Administration Adviser and other advisers as considered necessary (e.g. the Fund Actuary, institutional investment adviser).

The Pension Advisory Board meets at least twice per year.

The Pension Advisory Board will follow the dedicated EPF training plan which includes specific internal training sessions in order they may maintain an appropriate level of knowledge and skills to perform their role effectively.

The Pension Advisory Board reports its activities at the end of each financial year to the Authority and will be publicly disclosed.

Governance Compliance Statement: Section 101 Committees

As can be seen, Essex Pension Fund governance arrangements in respect of the PSB and ISC are fully compliant with the latest guidance issued by the Secretary of State for Communities and Local Government (issued in 2008):

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Description of Principle	Essex Pension Fund's Position	Future Action
<p>A Structure</p> <p>(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.</p> <p>(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.</p> <p>(c) that where a secondary committee or panel has been established, the structure ensures effective communication across both levels.</p> <p>(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.</p>	<p>The Essex Pension Fund Strategy Board was established as the Essex Pension Fund Board in 2008, changing its name on 1st April 2015 following the formation of the Essex Pension Fund Advisory Board. It is an overarching body to oversee the functions of the County Council as Administering Authority of the Fund, except where they have been specifically delegated to another committee or officers.</p> <p>Its functions include monitoring the administration of the Pension Scheme, exercising Pension Fund discretions and determining Pension Fund policy towards employer admission arrangements. Membership of the Pension Strategy Board is drawn from the County Council as well as other scheme employers and member representatives. All representatives have full voting rights and receive appropriate training and development.</p> <p>In addition to the Pension Strategy Board the Fund has also put in place an Investment Steering Committee (ISC). The role of the ISC is to oversee and approve all matters related to the Fund's investments. Their main role is to decide asset allocation, appoint investment managers and periodically review and monitor investment manager performance. All decisions of the ISC are ultimately ratified by the Pension Strategy Board.</p> <p>Membership of the ISC is drawn from the County Council representatives of the Pension Strategy Board, all of which have full voting rights as well as employer and member representatives from the Pension Strategy Board (who have observer status only).</p>	<p>The Fund has developed a rolling three year business plan, which includes the training, development and effectiveness of the Pension Strategy Board and ISC. This plan is reviewed quarterly.</p>

Description of Principle	Essex Pension Fund's Position	Future Action
<p>B Representation</p> <p>(a) that all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include:</p> <p>(i) employing authorities (including non-scheme employers, e.g. admitted bodies);</p> <p>(ii) scheme members (including deferred and pensioner scheme members);</p> <p>(iii) independent professional observers;</p> <p>(iv) expert advisers (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>The terms of reference of both the Pension Strategy Board and the ISC set out the term of office for individual members. The terms of reference of the Pension Strategy Board also sets out the mechanism by which representatives from different sectors of scheme employers are able to volunteer for membership of the Pension Strategy Board. For example:</p> <ul style="list-style-type: none"> • District and Borough Council representatives are nominated by the Leaders/Chief Executives of those organisations; • Member representatives are nominated by the individual unions; and • Small employing body representatives are nominated following voting by eligible employers attending the Pension Fund Employer Forum <p>All members of the Pension Strategy Board and ISC are treated equally in terms of provision of meeting papers, opportunity to contribute (full voting rights on the Pension Strategy Board) and knowledge and skills training.</p> <p>In addition, the Pension Strategy Board has appointed an independent governance and administration adviser to assist the Pension Strategy Board and its officers.</p>	

Description of Principle	Essex Pension Fund's Position	Future Action
<p>C Selection and Role of Lay Members</p> <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>This is clearly set out in the terms of reference of both the Pension Strategy Board and ISC.</p>	<p>Continually monitor and review to ensure that the functions of the Pension Strategy Board and ISC remain appropriate.</p>
<p>D Voting</p> <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>All members of the Pension Strategy Board have full voting rights. While voting rights of the ISC is limited to the County Council members only, this reflects the fact that ultimately it is the County Council that has the legal responsibility to pay all benefits from the Fund.</p> <p>The observer members of the ISC will of course have full voting rights as members of the PSB, when considering any decisions taken by the ISC that are subsequently referred to the PSB.</p>	<p>Continually monitor and review to ensure appropriate.</p>

Description of Principle	Essex Pension Fund's Position	Future Action
<p>E Training/ Facility Time/ Expenses</p> <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> <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>	<p>The Fund has put in place a comprehensive knowledge and skills training strategy in place, which covers all aspects of the CIPFA knowledge and skills framework.</p> <p>The document sets out the strategy agreed by the Pension Strategy Board concerning the training and development of:</p> <ul style="list-style-type: none"> • all the members of the Pension Strategy Board and the ISC; and • the officers of the Essex Pension Fund responsible for the management of the Fund. <p>The training strategy was established to aid members of the Pension Strategy Board and the ISC 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.</p> <p>In addition the Pension Fund has developed a full training strategy and plan, which ensures the Pension Fund is managed, and its services delivered, by people who have the appropriate knowledge and expertise and that they act with integrity and accountability to all stakeholders and decisions, ensuring they are robust and well-based.</p> <p>Member Allowance Scheme is set out in the ECC Constitution for the members carrying out their Board/Committee decision making responsibilities. Allowances are limited to the County Council members only.</p> <p>All costs associated with the attendance of training/conferences away from County Hall for all Board/Committee members that are relevant and within the training strategy plan are met by the EPF.</p> <p>Participating employers are also encouraged to allow facilities' time where relevant.</p>	<p>A training plan has been formed and will be rolled out from 2016.</p>

Description of Principle	Essex Pension Fund's Position	Future Action
<p>F Meetings – Frequency</p> <p>(a) that an administering authority's main committee or committees meet at least quarterly.</p> <p>(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.</p> <p>(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.</p>	<p>The Pension Strategy Board and ISC meet a minimum of four times a year.</p> <p>Meetings of both the Pension Strategy Board and ISC are arranged so that outputs from the ISC are available to the Pensions Strategy Board in a timely manner.</p>	

Description of Principle	Essex Pension Fund's Position	Future Action
<p>G Access</p> <p>(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.</p>	<p>All members of the Pension Strategy Board and ISC are provided access to all committee papers and documentation via the Pension Fund's on-line portal infoBOARD.</p>	
<p>H Scope</p> <p>(a) that administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.</p>	<p>The role of the Pension Strategy Board is to consider all aspects of the management and administration of the Essex Pension Fund. While certain day-to-day responsibilities have been delegated to officers and investment decisions to the ISC, via the County Council's scheme of delegation the Pension Strategy Board's remit includes monitoring the administration of the pension team, exercise of administering authority discretions and determining the Fund's policy in relation to the admission of new employers.</p>	
<p>I Publicity</p> <p>(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.</p>	<p>Full details of the governance arrangements of the Essex Pension Fund are contained within this Statement as well as additional detail being included within the Pension Fund Annual Report, which is available on the Fund's website www.essexpensionfund.co.uk.</p>	

Governance Compliance Statement: Essex Pension Fund Advisory Board

At present the latest guidance issued by the Secretary of State for Communities and Local Government does not extend to the governance arrangements of the newly formed local Board, the Essex Pension Fund Advisory Board (PAB). The following table sets out how the PAB complies with the requirements applicable to local pension boards, as set out in the LGPS Regulations, Scheme Advisory Board Guidance and The Pensions Regulator's Code of Practice No. 14.

Requirement	Essex Pension Fund's Position	Future Action
A - LGPS 2013 Regulations		
Where the Scheme manager is a committee of a local authority the local pension board may be the same committee if approval in writing has been obtained from the Secretary of State.	The PAB has been set up as a separate, stand-alone Board. Essex County Council has not taken steps to seek Secretary of State approval for the setting up of a joint arrangement with the PSB.	The County Council will monitor, with interest, the success of any scheme manager that does receive Secretary of State approval to the setting up of a joint arrangement.
Where the administration and management of a Scheme is wholly or mainly shared by two or more administering authorities, those administering authorities may establish a joint local pension board if approval in writing has been obtained from the Secretary of State.	The Essex Pension Fund is solely managed by Essex County Council.	
Only employer and scheme member representatives shall be entitled to vote	Although the PAB has an independent Chair voting rights only extend to the employer and member representatives	

Requirement	Essex Pension Fund's Position	Future Action
<p>The administering authority has established a fair and transparent process for the appointment of local pension board members</p>	<p>The terms of reference of the PAB set out the term of office for individual members. The terms of reference of the PAB also sets out the mechanism by which representatives from different sectors of scheme employers are able to volunteer for membership of the PAB. For example:</p> <p>Employers Representatives</p> <ul style="list-style-type: none"> • District and Borough Council representatives are nominated by the Leaders/Chief Executives of those organisations; and • Small employing body representatives are nominated following voting by eligible employers attending the Pension Fund Employer Forum. <p>Member Representatives</p> <ul style="list-style-type: none"> • Member representatives are nominated by the individual unions; and • by members individually. <p>All members of the PAB are treated equally in terms of provision of meeting papers, opportunity to contribute (full voting rights) and knowledge and skills training.</p> <p>In addition, the Pension Strategy Board has appointed an independent governance and administration adviser to assist the both the PSB and its officers.</p>	

Requirement	Essex Pension Fund's Position	Future Action
<p>The local pension board consists of at least 4 members of whom 2 are employer representatives and 2 scheme member representatives</p>	<p>The PAB includes a membership of 4 employer and 4 member representatives and an independent Chair. Each of the 4 employer and 4 member representatives has equal voting rights. The independent Chair has no voting rights.</p> <p>The PAB has no decision making powers.</p>	
<p>Employer and scheme member representatives have the capacity to represent their constituency.</p>	<p>The Fund has put in place a comprehensive knowledge and skills training strategy in place, which covers all aspects of the CIPFA knowledge and skills framework.</p> <p>The document sets out the strategy agreed by the PAB concerning the training and development of its members.</p> <p>The training strategy was established to aid members of the PAB 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 responsibilities put upon them.</p> <p>In addition the Pension Fund has developed a full training strategy and plan, which ensures the Pension Fund, is managed, and its services delivered, by people who have the appropriate knowledge and expertise and that they act with integrity and accountability to all stakeholders and decisions, ensuring they are robust and well-based.</p>	<p>A training plan has been formed and will be rolled out from 2016.</p>

Requirement	Essex Pension Fund's Position	Future Action
<p>Where the local pension board is not a joint body also exercising delegated decision making powers;</p> <p>a) no officer or elected member of the administering authority who is also responsible for the discharge of functions under LGPS 2013 may be a member of the local pension board, and</p> <p>b) any elected member of the administering authority who is a member of the pension board must be an employer or scheme member representative.</p>	<p>No officer or elected member on the PAB has any responsibility for the discharge of function under the LGPS Regulations as part of their normal duties.</p>	
<p>No person to be appointed to the pension board may have a conflict of interest.</p>	<p>All members of the PAB are required to adopt and adhere to the County Council's published conflict of interest policy. Where any conflict or potential conflict is identified it must be declared and any remedial action taken to resolve the conflict or potential conflict must be carried out in accordance with the County Council's stated conflicts policy in place at that time</p>	
<p>No member of a pension board may have a conflict of interest.</p>	<p>All members of the PAB are required to adopt and adhere to the County Council's published conflict of interest policy. Where any conflict or potential conflict is identified it must be declared and any remedial action taken to resolve the conflict or potential conflict must be carried out in accordance with the County Council's stated conflicts policy in place at that time.</p>	

Requirement	Essex Pension Fund's Position	Future Action
B – Training		
<p>There is a clear policy on training which complies with the Pension Regulator's code of practice no. 14</p>	<p>The Fund has put in place a comprehensive knowledge and skills training strategy in place, which covers all aspects of the CIPFA knowledge and skills framework.</p> <p>The document sets out the strategy agreed by the PAB concerning the training and development of its members.</p> <p>The training strategy was established to aid members of the PAB 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 responsibilities put upon them.</p> <p>In addition the Pension Fund has developed a full training strategy and plan, which ensures the Pension Fund, is managed, and its services delivered, by people who have the appropriate knowledge and expertise and that they act with integrity and accountability to all stakeholders and decisions, ensuring they are robust and well-based.</p>	
C - Expenses and facility time		
<p>There is a clear policy on the reimbursement of expenses and use of facility time</p>	<p>Provision has been made in the accounting procedures to identify the costs incurred in the establishment and operational costs of the local pension board. Participating employers are also encouraged to allow facilities' time where relevant.</p>	

Requirement	Essex Pension Fund's Position	Future Action
D - Conduct of members		
The members of a Local Pension Board should have regard to the 'Seven Principles of Public Life' ("the Nolan Principles")	All members of the PAB will have been made aware of the Seven Principles of Public Life as part of their initial induction and as part of regular reminders in ongoing training and development.	
E - Reporting Breaches		
There should be a policy in place for the reporting of breaches of the law.	It is the responsibility of all members of the PAB to understand their individual and collective responsibilities in this area and to familiarise themselves with the steps they should follow in the event a breach of the law is suspected.	
F - Internal reporting		
There should be a clear mechanism for the Pension Board to report its requests, recommendations or concerns	This is covered within the PAB terms of reference	