

FLINTSHIRE COUNTY COUNCIL

REPORT TO: **CLWYD PENSION FUND COMMITTEE**

DATE: **24th MARCH 2015**

REPORT BY: **CHIEF OFFICER (PEOPLE AND RESOURCES)**

SUBJECT: **CONFLICTS OF INTEREST POLICY**

1.00 PURPOSE OF REPORT

1.01 To ask Committee Members to consider the Fund's draft Conflict of Interests Policy.

2.00 BACKGROUND

2.01 Conflicts of interest have always existed for those with LGPS administering authority responsibilities as well as for advisers to LGPS funds. The Pensions Regulator and national LGPS Advisory Board now recommend that all LGPS administering authorities put in place a Conflict of Interest Policy for, as a minimum, the operation of their new local pension boards.

2.02 Conflicts of interest often exist in an LGPS environment as a result of an individual having a personal, business or other interest which might conflict, or be perceived to conflict, with their role in managing or advising LGPS funds. Further, an actual or potential conflict can arise due to an individual having other roles and responsibilities, for example as a member of the scheme, or as an elected member of an employer participating in the LGPS.

2.03 In the context of managing the Pension Fund, there are often situations that might not be considered personal and prejudicial interests that still need to be disclosed under the Flintshire County Council Members' Code of Practice. Accordingly it is good practice to create a Conflicts of Interest Policy to apply to all those involved with the management of the Fund, not just the local Pension Board members.

3.00 CONSIDERATIONS

3.01 The attached draft Policy includes examples of actual and potential conflicts in relation to pension fund management as well as setting out the process to be followed to manage these conflicts by all Pension Fund Committee members, Pension Board members, senior officers and advisers to the Fund. In most circumstances any such potential conflicts can be successfully managed, and therefore the focus of the policy is ensuring potential conflicts are identified and considered at the earliest possible stage and appropriate records are maintained to ensure transparency.

3.02 Jane Marshall from Eversheds legal advisers will present a training session to Pension Committee Members on conflicts of interest at 9.30am on the 24th March, immediately prior to the Pension Fund Committee meeting. The Democracy and Governance Manager will also be available to answer questions and provide advice on the proposed policy.

4.00 RECOMMENDATIONS

4.01 That Committee Members agree the Conflicts of Interest Policy.

5.00 FINANCIAL IMPLICATIONS

5.01 Any costs associated with delivering this policy will be recharged to the Clwyd Pension Fund.

6.00 ANTIPOVERTY IMPACT

6.01 None directly as a result of this report.

7.00 ENVIRONMENTAL IMPACT

7.01 None directly as a result of this report.

8.00 EQUALITIES IMPACT

8.01 None directly as a result of this report.

9.00 PERSONNEL IMPLICATIONS

9.01 None directly as a result of this report.

10.00 CONSULTATION REQUIRED

10.01 None directly as a result of this report.

11.00 CONSULTATION UNDERTAKEN

11.01 None directly as a result of this report.

12.00 APPENDICES

12.01 Appendix – Conflicts of Interest Policy

LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

Background Papers: None

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