

Annual Review of Objective Measures for Governance Related Policies and Strategies

Appendix 3

Objective	Monitoring arrangements	Assessment against requirements
Governance Policy		
Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies.	The Independent Adviser undertakes an annual review of the effectiveness of the Clwyd Pension Fund's governance arrangements, the findings of which are reported to the Committee and published.	Compliant – included in the 2020/21 Annual Report.
	The Pension Board prepares and publishes an annual report.	Compliant – included in the 2020/21 Annual Report.
	In line with the Regulations this document will be filed with the MHCLG (now DLUHC).	Compliant.
Ensure the Pension Fund is managed and its services delivered by people who have the appropriate knowledge and expertise	A Training Policy (now the Knowledge and Skills Policy) is in place together with monitoring and reporting of all training by Pension Committee members, Pension Board members and key officers in accordance with the Training Policy.	Compliant – Latest Policy approved September 2021. Monitoring information now included in Committee Governance update report
	The WPP Joint Governance Committee has a Training Policy in place with monitoring arrangements in accordance with the Inter Authority Agreement.	Compliant.
Act with integrity and be accountable to our stakeholders for our decisions, ensuring they are robust and well based	A Conflicts of Interest Policy is in place together with ongoing reporting and monitoring of the register of conflicts in accordance with the Conflicts of Interest Policy.	Compliant – Latest Policy approved September 2021. Declarations and monitoring carried out at each meeting.

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	The employers within the Fund, together with union representatives, are invited to an Annual Joint Consultative Meeting. Attendees receive presentations and have the opportunity to ask questions on the governance of the Fund.	Compliant.
	The Pension Fund Committee includes representatives from scheme members and most employers in the Fund.	Compliant.
	The Pension Board includes representatives from scheme members and employers in the Fund.	Compliant.
	The Pension Board prepares and publishes an annual report which may include comment on decision making.	Compliant – included in the 2020/21 Annual Report.
	The WPP Joint Governance Committee prepares an annual business plan which is brought to the Clwyd Pension Fund Committee for agreement in accordance with the Inter Authority Agreement	Compliant – last agreed at March 2021 Committee.
Understand and monitor risk	A Risk Policy and register in place and monitoring and reporting of risks is carried out in accordance with the Risk Policy.	Compliant - Latest Policy approved October 2020.
	Ongoing consideration of key risks at Pension Fund Committee meetings.	Compliant – in Committee Update reports.
Strive to ensure compliance with the appropriate legislation and statutory guidance and to act in the spirit of other relevant guidelines and best practice guidance	The Governance of the Fund is considered by both the External and Internal Auditors. All External and Internal Audit Reports are reported to Committee.	Compliant.
	The Fund has an Independent Adviser and their annual report includes reference to compliance with key requirements.	Compliant – included in the 2020/21 Annual Report.

Objective	Monitoring arrangements	Assessment against requirements
	The Fund carries out a compliance check, at least annually, against the relevant The Pension Regulator's Code of Practice.	Compliant – This was last done in September 2021.
	The Fund maintains a log of all breaches of the law in accordance with the Fund's breaches procedure which is reported on and monitored as outlined in that procedure.	Compliant – in Committee Update reports.
	The Pension Board prepares and publishes an annual report which may include comment on compliance matters.	Compliant – included in the 2020/21 Annual Report.
	The WPP Joint Governance Committee has a Breaches and Error Policy in place with monitoring arrangements in accordance with the Inter Authority Agreement.	Non-compliant.
Clearly articulate our objectives and how we intend to achieve those objectives through business planning, and continually measure and monitor success	All strategies and policies include reference to how objectives will be monitored.	Compliant.
	Ongoing monitoring against key objectives at Pension Fund Committee meetings.	Compliant – in Committee Update reports.
	Ongoing monitoring of business plan targets at Pension Fund Committee meetings.	Compliant – in Committee Update reports.
	Quarterly and annual updates against the WPP Joint Governance Committee's business plan and objectives are provided in accordance with the Inter Authority Agreement.	Compliant.
Ensure the confidentiality, integrity and accessibility of the Fund's data, systems and services is protected and preserved.	All information security breaches relating to data being issued insecurely by the Fund are recorded and reviewed.	Compliant – A number of member benefit statements contained membership data relating to other members. This was investigated and reported to the ICO, in line with the requirements.

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	All other incidents affecting confidentiality, integrity and accessibility of data, systems or services are recorded and reviewed.	Compliant
	The Fund has a cyber incident response plan in place.	Partially compliant – Work to produce this has begun and will be completed during the 2021/22 scheme year.
	The Fund has a business continuity plan and a testing schedule (including cyber incident testing) in place which is adhered to.	Partially compliant – Work to produce this has begun and will be completed during the 2021/22 scheme year.
	All Fund staff undertaken GDPR training in accordance with FCC's training programme.	Compliant
Risk Policy		
<p>Understand and monitor risk, aiming to:</p> <ul style="list-style-type: none"> • integrate risk management into the culture and day-to-day activities of the Fund • raise awareness of the need for risk management by all those connected with the management of the Fund (including advisers, employers and other partners) • anticipate and respond positively to change • minimise the probability of negative outcomes for the Fund and its stakeholders • establish and maintain a robust framework and procedures for 	<p>The Independent Governance Adviser will be commissioned to provide an annual report on the governance of the Fund each year, a key part of which will focus on the delivery of the requirements of this Policy.</p>	<p>Compliant – included in the 2020/21 Annual Report.</p>

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<p>identification, analysis, assessment and management of risk, and the reporting and recording of events, based on best practice</p> <ul style="list-style-type: none"> ensure consistent application of the risk management methodology across all Pension Fund activities, including projects and partnerships. 		
Conflicts of Interest Policy		
<ul style="list-style-type: none"> The identification and management of potential and actual conflicts of interest is integral to us achieving our governance objectives (as outlined above) 	<p>All declarations should be collated and recorded on the Fund's Register of Conflicts of Interests.</p>	<p>Compliant.</p>
	<p>In order for us to fulfil our obligations to manage and monitor potential conflicts of interests the Pension Fund Committee and the Pension Board must include an item on conflicts of interest at each meeting.</p>	<p>Compliant - This is a standing item for both the Committee and the Board.</p>
	<p>The Pension Board must also include an item on conflict of interest in its Annual Report.</p>	<p>Compliant – included in the 2020/21 Annual Report.</p>
	<p>The Fund's Register of conflicts of interest may be viewed by any interested party at any point in time. It will be made available on request by the Head of the Clwyd Pension Fund.</p>	<p>Compliant – there have been no requests for this in 2021/22.</p>
	<p>Review the Register of conflicts of interest on an annual basis and consider whether there have been any potential or actual conflicts of interest that were not declared at the earliest opportunity.</p>	<p>Compliant.</p>

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	Provide our findings to our Independent Adviser and ask them to include comment on the management of conflicts of interest in their annual report on the governance of the Fund each year.	Compliant – included in the 2020/21 Annual Report.
Breaches Policy		
<p>Ensure individuals responsible are able to meet their legal obligations and avoid placing any reliance on others to report.</p> <p>The procedure will also assist in providing an early warning of possible malpractice and reduce risk.</p>	<p>A report will be presented to the Pension Fund Committee on a quarterly basis setting out:</p> <ul style="list-style-type: none"> • all breaches, including those reported to The Pensions Regulator and those not reported, with the associated dates. • in relation to each breach, details of what action was taken and the result of any action (where not confidential) • any future actions for the prevention of the breach in question being repeated • new breaches which have arisen since the previous meeting. 	Compliant – in Committee Update reports.
	This information will also be provided upon request by any other individual or organisation (excluding sensitive/confidential cases or ongoing cases where discussion may influence the proceedings).	Compliant – no requests received.
Training Policy		
<ul style="list-style-type: none"> • Ensure that the Clwyd Pension Fund is appropriately managed and that its services are delivered by people who have the requisite knowledge and skills, and that this knowledge and expertise is maintained within the continually changing Local Government Pension 	Compare and report on attendance at training based on the following:	Results included in the 2020/21 Annual Report. Additional reporting is provided in Committee Update reports.

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<p>Scheme and wider pensions landscape.</p> <ul style="list-style-type: none"> Those persons responsible for governing the Clwyd Pension Fund have sufficient knowledge and skills to be able to evaluate and challenge the advice they receive, ensure their decisions are robust and well based, and manage any potential conflicts of interest. Those persons responsible for the management and governance of the Clwyd Pension Fund are expected to be committed to attending and engaging with suggested training in accordance with the Knowledge and Skills Policy. 	<ul style="list-style-type: none"> Individual Training Needs – ensuring a training needs analysis is carried out at least once every two years* which drives the content of the Fund's training plan. <p>*in exceptional circumstances, such as a major change to the Committee membership where induction training is being carried out, a training needs analysis may be deferred to a later date.</p>	Compliant – completed in Spring 2020.
	<ul style="list-style-type: none"> Hot Topic Training – attendance by at least 75% of the required Pension Fund Committee members, Pension Board members and senior officers at planned hot topic training sessions. This target may be focussed at a particular group of Pension Fund Committee members, Pension Board members or senior officers depending on the subject matter. 	Partially Compliant – attendance ranged from 56 to 67%.
	<ul style="list-style-type: none"> General Awareness – each Pension Fund Committee member, Pension Board member or senior officer attending at least one day each year of general awareness training or events. 	Partially Compliant – 77% of Committee and Board members achieved the requirement.
	<ul style="list-style-type: none"> Induction training – ensuring areas of identified individual training are completed within six months of appointment. 	Partially Compliant – Delivered within six months for all but one member.
	<p>Ask our Independent Adviser to provide an annual report on the governance of the Fund each year, a key part of which will focus on the delivery of the requirements of this Policy.</p>	Compliant – in Committee Update reports.