

Glasgow City Council

Strathclyde Pension Fund Committee

Item 8

2nd September 2020

Report by Director of Strathclyde Pension Fund

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Training Policy, Practice and Plan		
Purpose of Report:		
To present a training policy and practice statement for the Strathclyde Pension Fund together with a training plan for 2020/21.		
Recommendations:		
The Committee is asked to NOTE the contents of this report and to APPROVE the training policy and practice statements set out in Appendix B and the 2020/21 training plan set out in Appendix D.		
Ward No(s):	Citywide: ✓	
Local member(s) advised: Yes □ No □	consulted: Yes □ No □	
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1 Regulatory Background

Appendix A sets out the legal and regulatory background to training requirements for those involved in the management of pension schemes together with the role of the Pensions Regulator in this regard.

2 Practice and Policy Statements

CIPFA (the Chartered Institute of Public Finance and Accountancy) maintains a Code of Practice on Public Sector Pensions Finance Knowledge and Skills. The Code recommends that all organisations responsible for the financial management of public sector pension schemes should adopt CIPFA's practice and policy statements. These are set out in Appendix B.

3 Strathclyde Pension Fund - Training Plan 2020/21

3.1 Objective

The objective of the training plan is to ensure that all staff, Committee members and Board members with a role in the management and governance of the Strathclyde Pension Fund are fully equipped with the knowledge, skills and understanding to discharge the duties and responsibilities allocated to them.

3.2 Knowledge and Skills Framework

The CIPFA framework sets out the following key areas:

- Pensions legislations and guidance
- Pensions governance
- Funding strategy and actuarial methods
- Pensions administration and communications
- Pensions financial strategy, management, accounting, reporting and audit standards
- Investment strategy, asset allocation, pooling, performance and risk management
- Financial markets and product knowledge
- Pensions services procurement, contract management and relationship management

Committee and Board members should have an understanding of the general principles in these areas. All members should have some understanding, and collectively the committee and board need to have sufficient knowledge and skills to carry out their respective functions.

Senior officers are required to have a detailed knowledge of their areas of responsibility.

A detailed Knowledge and Skills Framework including links to sources of information is attached at Appendix C.

3.3 Strategy

Individual training needs will vary, and members are encouraged to assess their own requirements against the Knowledge and Skills Framework. The training plan will ensure that a variety of opportunities are available both for introductory training and for ongoing development on a regular basis. Training will be delivered using existing resources wherever possible. Members should advise the Director of any specific training needs and these will be addressed either individually or collectively.

3.4 Plan

The training plan for 2020/21 is set out in Appendix D.

3.5 Records

Appropriate records of the learning activities of the committee and board and their respective members will be maintained.

3.6 Review and Assessment

The Director of Strathclyde Pension Fund will assess overall training needs and objectives, and review the Training Plan annually.

4 Review of 2019/20 Training Plan

Key items offered as part of the 2019/20 training plan included the following.

- Induction training for new committee and board members
- Committee/ Board Briefings on:
 - Credit Markets (Oak Hill Advisors)
 - Infrastructure Investment (JP Morgan)
 - Thematic Investing (Lazard)
 - Actuarial Valuation 2020/Longevity Trends (Hymans Robertson/Club Vita)
- Attendance at:
 - LGC Investment Seminar
 - Scottish LGPS Conference
 - PLSA Investment Conference
- Support in completing TPR Public Service Toolkit

In addition, many agenda items considered at Committee and Board meetings are to note for information.

5 Policy and Resource Implications Resource Implications:

Financial: Any costs of delivering internal elements of the

training plan will be met from the Fund in common with the other costs of administering the scheme and in accordance with the Local Government

Pension Scheme Regulations.

Legal: Appendix A sets out the legal and regulatory

background to training requirements.

Personnel: None

Procurement: None

Council Strategic Plan: Strathclyde Pension Fund aligns with the theme

of a well governed city. The Training Plan is an important element in the Fund's governance.

Equality and Socio-Economic Impacts: Does the proposal support the Council's Equality Outcomes 2017-22 Equalities issues are addressed in the Fund's Responsible Investment strategy, in the scheme rules which are the responsibility of Scottish Government and in the Fund's Communications Policy which has been the subject of an Equalities Impact Assessment.

What are the potential equality impacts as a result of this report?

No specific equalities impacts.

Please highlight if the policy/proposal will help address socio economic disadvantage.

Sustainability Impacts:

Environmental: Environmental issues are addressed in the

Fund's Responsible Investment strategy.

Social, including opportunities under Article 20 of the European Public Procurement Directive:

Social issues are addressed in the Fund's Responsible Investment strategy

Economic: Economic issues are addressed in the Fund's

Responsible Investment strategy.

Privacy and Data Protection impacts:

None.

6 Recommendation

The Committee is asked **to NOTE** the contents of this report and **to APPROVE** the Training Policy and Practice Statements set out in Appendix B and the 2020/21 Training Plan set out in Appendix D.

1 Myners Principles/ CIPFA / LGPS Regulations

Training expectations for pension fund trustees were defined in the 2001 Myners Principles. They were revised and updated in the revised principles published in 2009. Principle 1 *Effective Decision Making* reads as follows.

Administering authorities should ensure that:

- decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to make them effectively and monitor their implementation; and
- those persons or organisations have sufficient expertise to be able to evaluate and challenge the advice they receive, and manage conflicts of interest.

Administering authorities are required by the Local Government Pension scheme regulations, to state within their Statement of Investment principles the extent of their compliance with the principles and guidance and the reasons for any non-compliance.

2 CIPFA Code of Practice

During 2011 CIPFA launched a Code of Practice on Public Sector Pensions Finance Knowledge and Skills. The Code seeks to embed the requirements for the acquisition, retention and maintenance of appropriate knowledge and skills. The Code of Practice is underpinned by four key principles:

- 1. Organisations responsible for the financial administration of public sector pension schemes recognise that effective financial management, decision-making and other aspects of the financial administration of public sector pension schemes can only be achieved where those involved have the requisite knowledge and skills.
- 2. Organisations have in place formal and comprehensive objectives, policies and practices, strategies and reporting arrangements for the effective acquisition and retention of public sector pension scheme finance knowledge and skills for those in the organisation responsible for financial administration and decision-making.
- 3. The associated policies and practices are guided by reference to a comprehensive framework of knowledge and skills requirements such as that set down in the CIPFA Pensions Finance Knowledge and Skills Frameworks.
- **4.** The organisation has designated a named individual to be responsible for ensuring that policies are implemented.

The Code of Practice recommends that all organisations responsible for the financial management of public sector pension schemes should adopt CIPFA's practice and policy statements. The proposed statements for adoption by the Strathclyde Pension Fund are set out in Appendix B.

3 The Pensions Regulator (TPR)

3.1 Background

From 1st April 2015 the Pension Regulator (TPR) became responsible for regulatory oversight of public service pension schemes including the LGPS as a result of the Public Service Pensions Act 2013. In January 2015 TPR published a Code of Practice for the Governance and Administration of Public service Pension Schemes.

3.2 TPR Code of Practice

3.2.1 Overview

The code is particularly directed at scheme managers and the members of pension boards and is structured as a reference document to be used by them to inform their actions in the core areas of:-

- governing your scheme
- managing risks
- administering your scheme and
- resolving issues.

3.2.2 Governing your scheme

This part of the code covers:

- knowledge and understanding required by pension board members
- conflicts of interest and representation, and
- publishing information about schemes.

3.2.3 Knowledge and Understanding

The code provides that a member of the pension board of a public service pension scheme must be conversant with:

- the rules of the scheme, and
- any document recording policy about the administration of the scheme which is for the time being adopted in relation to the scheme.

A member of a pension board must have knowledge and understanding of:

- the law relating to pensions, and
- any other matters which are prescribed in regulations.

The degree of knowledge and understanding required is that appropriate for the purposes of enabling the individual to properly exercise the functions of a member of the pension board.

3.2.4 Practical Guidance

The legislative requirements about knowledge and understanding only apply to pension board members. However, scheme managers should take account of this guidance as it will support them in understanding the legal framework and enable them to help pension board members to meet their legal obligations.

Schemes should establish and maintain policies and arrangements for acquiring and retaining knowledge and understanding to support their pension board members. Schemes should designate a person to take responsibility for ensuring that a framework is developed and implemented.

However, it is the responsibility of individual pension board members to ensure that they have the appropriate degree of knowledge and understanding to enable them to properly exercise their functions as a member of the pension board.

3.3 Public Service Toolkit

The Pensions Regulator has developed a toolkit for anyone involved in the governance and administration of public service pension schemes. This includes scheme contacts, scheme managers, pension board members, administrators and professional advisers. The Public Service toolkit is an excellent means to learn about managing public service pension schemes and to increase knowledge and understanding. Training modules include the key areas of:

- Conflicts of interest
- Managing risks and internal controls
- Maintaining accurate member data
- Maintaining member contributions
- Providing information to members and others
- · Resolving internal disputes and
- Reporting breaches of the law.

The toolkit is updated regularly.

The toolkit is available at:

http://www.thepensionsregulator.gov.uk/public-service-schemes.aspx

4 MiFID

The Markets in Financial Instruments Directive is the EU legislation regulating firms providing services to clients linked to 'financial instruments' (shares, bonds, units in collective investment schemes and derivatives), and the venues where those instruments are traded. Strathclyde Pension Fund is generally treated as a Professional Client under MiFID II. This category applies to a client who possesses the experience, knowledge and expertise to make its own investment decisions and duly assess the risk those investment decisions incurs. If SPF was unable to demonstrate such experience, knowledge and expertise, the default treatment would be as a retail investor. Retail investors enjoy greater protection but restricted access to investments under MiFID regulations.

Training Policy and Practice Statements

Policy Statement

- Glasgow City Council, as administering authority for the Strathclyde Pension Fund, recognises the importance of ensuring that all staff and members charged with financial administration and decision-making with regard to the Fund and the local government pension scheme are fully equipped with the knowledge and skills to discharge the duties and responsibilities allocated to them.
- The Council therefore seeks to utilise individuals who are both capable and experienced and will provide or arrange training for staff and members of the pensions decision-making bodies to enable them to acquire and maintain an appropriate level of expertise, knowledge and skills.

Practice Statement

- Glasgow City Council, as administering authority for the Strathclyde Pension Fund, adopts the key recommendations of the Code of Practice on Public Sector Pensions Finance Knowledge and Skills.
- The Council recognises that effective financial administration and decisionmaking can only be achieved where those involved have the requisite knowledge and skills.
- Accordingly the Council will ensure that it has formal and comprehensive objectives, policies and practices, strategies and reporting arrangements for the effective acquisition and retention of the relevant public sector pension scheme finance knowledge and skills for those in the organisation responsible for financial administration and decision-making.
- These policies and practices will be guided by reference to the comprehensive framework of knowledge and skills requirements as set down in the CIPFA Pensions Finance Knowledge and Skills Frameworks.
- The Council will report on an annual basis how these policies have been put into practice throughout the financial year.
- The Council has delegated the responsibility for the implementation of the requirements of the CIPFA Code of Practice to the Director of Strathclyde Pension Fund, who will act in accordance with the Council's policy statement, and with CIPFA Standards of Professional Practice (where relevant).

Area	Knowledge and Skills	Sources
Pensions	General pensions framework	
legislations and guidance	A general understanding of the pensions legislative framework in the UK.	Induction Training
ana garaanse	A general understanding of other legislation that is relevant in managing an LGPS fund e.g. Freedom of Information, General Data Protection Regulations (GDPR) and local authority legislation.	http://www.scotlgpsregs.org/land scape/relatedleg.php
	Scheme-specific legislation	Induction Training
	A general understanding of the legislation and statutory guidance specific to the scheme and the main features relating to benefits, administration, funding, governance, communications and investment including:	http://www.scotlgpsregs.org/sch emeregs/lgpsregs2018/timeline. php
	 A general understanding of the LGPS (Scotland) Regulations 2018. 	
	 A general understanding of the LGPS (Scotland) (Management and Investment of Funds) Regulations 2010. 	http://www.lgpsregs.org/timeliner egs/scot/maninvst/miidx10.htm
		Administration Strategy
	An awareness of LGPS discretions and how the formulation of the discretionary policies impacts on the fund, employers and scheme members.	https://www.spfo.org.uk/index.as px?articleid=16030
	A regularly updated awareness of the latest changes to the scheme rules and current proposals or potential changes to the scheme.	Periodic committee papers.

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A general understanding of the requirements of statutory guidance from the Responsible Authority, Scottish Government.

A general understanding of the requirements of the TPR Code of Practice.

An awareness of the requirements of guidance from the Scheme Advisory Board.

An awareness of the requirements of guidance from the Government Actuary's Department.

An awareness of other guidance relevant to the LGPS, such as from CIPFA.

https://pensions.gov.scot/

https://www.thepensionsregulato r.gov.uk/en/public-servicepension-schemes/furtherresources/public-service-codeof-practice

https://lgpsab.scot/

Induction Training.

Periodic committee papers.

Knowledge and Skills Matrix

Area	Knowledge and Skills	Sources
Pensions	An awareness of the LGPS regulations main features and requirements relating to the	https://edrms/Livelink/llisapi.dll?f
Governance	pension scheme governance.	unc=ll&objaction=overview&obji
	An awareness of statutory and other guidance relation to pension scheme governance	<u>d=142524686</u>
		Induction Training
	including statutory governance guidance, TPR Code of Practice, CIPFA/SOLACE,	Induction Training
	Scheme Advisory Board guidance and the Myners principles.	https://www.thepensionsregulato
	Pension regulators, Scheme Advisory Board and other bodies	r.gov.uk/en/about-us/how-we-
		regulate-and-enforce
	A general understanding of how the roles and powers of the Scottish Government,	
	TPR, the Pensions Advisory Service and the Pensions Ombudsman relate to the	https://www.pensionsadvisoryse
	workings of the scheme. A general understanding of the role of the Scheme Advisory	rvice.org.uk/
	Board and how it interacts with other bodies.	https://www.papaiana
		https://www.pensions-
	General constitutional framework	ombudsman.org.uk/
	A general understanding of the role of the administering authority in relation to the LGPS.	
	EGI G.	Induction Training
	A general understanding of the role of pension committees in relation to the fund,	Annual Report
	administering authority, employing authorities, scheme members and taxpayers.	, iiiiidai repert
	An awareness of the role and statutory responsibilities of the CFO and monitoring	Annual Audit Report
	officer.	
	Fund specific governance	Terms of Reference
		Tollio di Nololollo
	A strong understanding of the terms of reference and delegated responsibilities of the	https://www.glasgow.gov.uk/cou
	pension committee (including any sub-committees), the pension board and any other	ncillorsandcommittees/committe

delegated responsibilities to senior officers.

A general understanding of the stakeholders of the fund and the nature of their interests.

A general understanding of who the key officers responsible for the management of the fund are, how the pension team is structured and how services are delivered.

A general understanding of the fund's strategies, policies and other key documents.

A general understanding of how risk is monitored and managed, and the fund's current key risks.

A general understanding of how conflicts of interest are identified and managed.

A strong understanding of how breaches in law are recorded and managed, and if necessary reported to TPR, including each individual's personal responsibility in relation to breaches.

A general understanding of the fund's knowledge and skills policy and associated training requirements.

An awareness of the fund's process for dealing with complaints, including its Internal Dispute Resolution Procedure.

A general understanding of how the effectiveness of the fund's governance is reviewed.

Service Delivery

e.asp?bodyid=17&bodytitle=Stra thclyde+Pension+Fund+Commit tee

https://www.spfo.org.uk/index.as px?articleid=15814

Committee Papers

https://www.spfo.org.uk/index.as px?articleid=20809

Policy Documents

https://www.spfo.org.uk/index.as px?articleid=16026

https://www.thepensionsregulato r.gov.uk/en/public-servicepension-schemes/schememanagement

Training Plan

Committee Reports

Internal Audit Reports

A general understanding of the required budget and resources needed to manage and administer the fund.	Business Plan
A general understanding of the annual business planning cycle and budget setting. A general understanding of the fund's key performance indicators and other	Business Plan
performance measures.	
A general understanding of the fund's business continuity policy and cyber security policy.	Risk Policy
	Risk Register https://www.spfo.org.uk/index.as
	px?articleid=20464

Area	Knowledge and Skills	Sources
Funding strategy and actuarial methods	An awareness of the LGPS regulations main features and requirements relating to funding strategy and the setting of employer contributions including associated guidance.	Funding Strategy https://www.spfo.org.uk/index.as px?articleid=16031
	A general understanding of the role of the fund actuary. A general understanding of the funding strategy statement and the expected delivery of the funding objectives.	Induction Training
	A general understanding of the key risks to the fund relating to the funding strategy. Valuations A general understanding of the valuation process, including developing the funding	Actuarial Valuation
	strategy in conjunction with the fund actuary, and inter-valuation monitoring. An awareness of the costs to the employer including employer contributions and early retirement strain costs.	https://www.spfo.org.uk/index.as px?articleid=14494
	An awareness of the different types of employer that participate in the fund A general understanding of the importance of employer covenant, the relative strengths of the covenant across the fund's employers, and how this impacts the funding strategy adopted.	
	A general understanding of any legislative and/or benefit uncertainty and the impact of	Committee Reports

this on the funding strategy.

A general understanding of the Scheme valuation and other work carried out by the Government Actuary's Department and the impact this has on the valuation process (i.e. cost management process/Section 13 report).

Committee Papers

New employer and exits

A general understanding of the implications of including new employers into the fund and of the exit of existing employers.

A general understanding of the relevant considerations in relation to the different types of new employer, e.g. outsourcings, alternative delivery models and also the considerations in relation to bulk transfers.

Administration Reports

Area	Knowledge and Skills	Sources
Pensions administration and communicatio ns	An awareness of the LGPS regulations main features and requirements relating to: - administration and communications strategies, - entitlement to and calculation of pension benefits, - transfers in and out of the scheme, - employee contributions and - the delivery of administration and communications. including associated guidance.	Induction Training
	A general understanding of the fund's pensions administration strategy including how it is delivered (including, where applicable, the use of third party suppliers and systems) performance measures and assurance processes. A general understanding of the fund's communications policy including how it is delivered (including, where applicable, the use of third party suppliers and systems), performance measures and assurance processes. A general understanding of best practice in pensions administration, e.g. performance and cost measures. A general understanding of the fund's processes and procedures relating to:	Pension Administration Strategy Communications Policy https://www.spfo.org.uk/index.as px?articleid=14498 Administration Reports

- member data maintenance and record-keeping including data improvement plans and relationships with employers for data transmission
- contributions collection.

An awareness of how the fund interacts with the taxation system in relation to benefits administration, including the annual and lifetime allowances.

A general understanding of additional voluntary contribution (AVC) arrangements including:

- the AVC arrangements that exist
- the choice of investments to be offered to members
- the provider's investment and fund performance,
- the payment of contributions to the provider
- the benefits that can be received by scheme members,
- how and when the AVC arrangements, including the investment choices, are reviewed.

Induction Training

Prudential

https://www.pru.co.uk/rz/localgo v/?utm_source=redirect&utm_m edium=301&utm_campaign=/rz/localgov/scotland/avcs/

Knowledge and Skills Matrix

Area	Knowledge and Skills	Sources
Pensions financial strategy,	A general understanding of the Accounts and Audit Regulations and legislative requirements relating to role of the committee and individual members in considering and signing off the fund's accounts and annual report.	Annual Report
management, accounting, report and audit standards	A general understanding of the various elements of income and expenditure to the fund, including the operational budget.	Business Plan
	A general understanding of the cashflows of the fund and how risks are managed to ensure appropriate cash is available to pay benefits and other outgoings.	Financial Statements
	A general understanding of the role of both internal and external audit in the governance and assurance process.	Audit Reports

Area	Knowledge and Skills	Sources
Investment strategy, asset allocation, pooling, performance and risk	An awareness of the LGPS regulations main features and requirements relating to investment strategy, asset allocation, the pooling of investments and responsible investments including associated guidance.	Induction Training
management	Investment strategy	
_	A general understanding of the key risks that the fund is exposed to and how a fund's	Risk Policy
	investment strategy should be considered in conjunction with these risks.	https://www.spfo.org.uk/index.as px?articleid=16026
	A general understanding of the risk and return characteristics of the main asset classes (equities, bonds, property), and the need to balance risk versus reward when determining the investment strategy.	Investment Strategy Review
		Statement of Investment Principles
	A general understanding of the role of these asset classes in long-term pension fund investing.	https://www.spfo.org.uk/index.as px?articleid=16026
	A general understanding of the fund's cashflow requirements and how this impacts on the types on investments considered.	Business Plan

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	A general understanding of the importance of monitoring asset returns relative to the	Investment Reports Investment Advisory Panel reports
	Performance of the committee	Training Plan
	An awareness of the Myners principles and the need to set targets for the committee and to report against them.	
	An awareness of the range of support services, provided to the committee who supplies them and the nature of the performance monitoring regime.	
	Responsible Investment	
	An awareness of the latest developments and requirements in the area of responsible investment.	Responsible Investment Reports
	An awareness of the UK Stewardship Code and the United Nations Principles of Responsible Investment ('UNPRI') and whether the fund is a signatory to these.	

A general understanding of the fund's approach to responsible investment including how views on Environmental, Social and Governance issues are incorporated into the fund's investment strategy.

Risk Management

A general understanding about how to manage and reduce risk and lessen impact of risk on assets when it arises.

Risk Policy

https://www.spfo.org.uk/index.as px?articleid=16026

Area	Knowledge and Skills	Sources
Financial	Financial markets	
markets and products knowledge	A general understanding of the primary importance of the investment strategy decision.	Induction Training
	A general understanding of the workings of the financial markets and of the investment vehicles available to the pension fund and the nature of the associated risks.	Investment Reports
	An awareness of the restrictions placed by legislation on the investment activities of LGPS funds.	
	MiFID II	
	A general understanding of MiFID II requirements relating to the knowledge of decision makers.	Training Plan

Area	Knowledge and Skills	Sources
Pensions	Understanding public procurement	
services procurement, contract	An awareness of the main public procurement requirements of UK and EU legislation and the use of national frameworks within the context of the LGPS.	Induction Training Committee Reports
management and	Fund suppliers	Committee Reports
relationship management	Awareness of the key decision makers in relation to the fund's procurements.	
gee	A general understanding of the fund's suppliers and providers, and their roles in the management of the fund.	Committee Briefings
	An awareness of how the fund's suppliers are monitored, including:	
	- the Myners principles, and	Investment Advisory Panel reports
	- the need for strategic objectives for investment consultants.	Toponto
	Supplier risk management	Induction Training
	A general understanding of the nature and scope of risks for the pension fund and of the importance of considering risk factors when selecting external suppliers and	maddion framing
	providers.	Audit Reports
	A general understanding of how the pension fund monitors and manages the performance of their external suppliers and providers, including business continuity and cyber risk.	

Strathclyde Pension Fund - Training Plan 2020/21

i. Introductory training will be provided to any new committee and board members at the earliest opportunity.

ii. Regular Briefings

The practice of holding a briefing session on a relevant or topical issue during each of the quarterly meetings of the Committee and Board will continue. Briefing papers will also be produced to update the Committee and Board in respect of significant developments in relevant areas.

iii. Training Sessions

Ad-hoc internal training sessions will be organised to address particular issues or decisions as they arise. A session on development of the climate change strategy will be arranged at an early date.

iv Public Service Toolkit

The toolkit is available at:

http://www.thepensionsregulator.gov.uk/public-service-schemes.aspx

Relevant staff, Committee members and Board members should use the toolkit to develop their own knowledge and understanding as they consider appropriate.

The toolkit includes brief assessments as part of each of its individual courses or modules. Completion of the modules will assist individuals in identifying any further training needs.

v. Individual Assessment and Training

Further training will be provided on the basis of individual needs identified through completion of the Public Service Toolkit courses or at other times. Committee and Board members should contact the Director or officers to discuss any individual training needs. Assessment of overall progress will be used as the basis for planning future briefings and training sessions.

vi. External Training Events

Committee and Board members will be advised of appropriate external training events which they may wish to attend. Events are likely to be held virtually for the foreseeable future.
