

Appendix 2 Gap Analysis Good Governance Review

Area	Ref	Proposal	Action Required by Harrow
A General	A1	MHCLG Statutory Guidance	Ensure compliance subject to statutory guidance
	A2	Single named officer responsible for all LGPS related activity for fund	Already Compliant (S151) is responsible for whole fund
	A3	Publish governance statement signed by S151 officer	Subject to statutory guidance A1
B Conflicts of Interest	B1	Funds to publish conflicts of interest policy including perceived conflicts identified in guidance	Harrow has Member conflicts of interest policy and guidance but this would need expanding to include all new requirements of guidance.
	B2	Guidance should refer to all those involved in management of LPGS to guide on fiduciary and statutory duty	Harrow would action this requirement and include on Pension Fund Committee (PFC) Work Programme
C. Representation	C1	Publish a policy on the representation of scheme members and non-administering authorities on its committees	Already set out in Pension Board Terms of Reference & Council Constitution in respect of PFC. Review current arrangements to ensure compliance.
D Knowledge and Understanding	D1	Requirement in Guidance for key individuals within LGPS including Officers and Members to have appropriate level of knowledge and understanding to undertake role effectively	Training programme already in place. Review current arrangements to ensure compliance
	D2	Requirement for Section 151 officer to carry our LPGS training as part of CPD	As D1
	D3	Administering authority to publish training policy	As above

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	D4	CIPFA to be requested to produce training policy and include LGPS training within training qualification	CIPFA Action
E Service Delivery for the LPGS function	E1	Publish Roles and Responsibilities Matrix to reflect scheme of delegation	New requirement
	E2	Publication of administration strategy	New requirement for Harrow
	E3	Report fund performance against set of indicators designed to measure standards of service	Harrow already reports against key indicators Expand Aon Dashboard.
	E4	Administering Authority must include Committee in Business Planning Process and agree budget allocated to deliver LGPS service over next financial year	Budget agreed as a part of the annual budget setting process but not currently reported to PFC in advance.
	E5	Administering Authority to consider pay and recruitment policies relevant to needs of pension function not apply general council staffing policies such as recruitment freeze	Council's terms and conditions of employment apply to pension function and include scope for market factor supplement.
F Compliance and improvement	F1	Biennial Independent Governance Review of the administering authority with a required improvement plan if any issues identified	New requirement
	F2	LGA to consider establishing a peer review process for LPGS funds	(LGA action)