



SURREY PENSION FUND COMMITTEE REPORT

SURREY COUNTY COUNCIL

SURREY PENSION FUND COMMITTEE

DATE: 21 MARCH 2025

LEAD OFFICER: NEIL MASON, LGPS SENIOR OFFICER

SUBJECT: CONFLICTS OF INTEREST POLICY

SUMMARY OF ISSUE:

This report considers a proposed draft Conflicts of Interest Policy applicable equally to Pension Fund Committee and Local Pension Board Members along with Officers and Advisors involved in the management of the Surrey Pension Fund.

RECOMMENDATIONS:

It is recommended that the Pension Fund Committee:

1. To approve the Surrey Pension Fund Conflicts of Interest Policy.

REASON FOR RECOMMENDATIONS:

To optimise the performance of the Surrey Pension Fund (the Fund), by more effectively recognising the distinct relationship and management of conflicts of interest with Surrey County Council by having a Surrey Pension Fund Conflicts of Interest Policy. This meets the newly added term of reference for the Pension Fund Committee.

DETAILS:

Background

1. At its meeting on 8 October 2024, Full Council of Surrey County Council (the Council) agreed to amend the Pension Fund Committee Terms of Reference to acknowledge the potential conflict of the Council in its dual role as the Administering Authority of the Surrey Pension Fund (the Fund) and a scheme employer of the Fund.
2. The following was added to the Terms of Reference:

“j) To consider and approve an annual conflict of interest policy, which shall include how the potential conflict of Surrey County Council in its dual role as Administering Authority for and scheme employer of the Surrey Pension Fund is managed.”
3. Accordingly, this report presents Annexe 1, the proposed Surrey Pension Fund Conflict of Interest Policy (the Policy) for consideration and approval by the Committee.

4. The Policy applies equally to all parties involved in the administration, management and governance of the Fund. The Fund has worked with Barnet Wadingham with drafting the Policy. It is intended that the Policy applies to:
- a) Members of the Pension Fund Committee (including elected and co-opted members)
 - b) Members of any sub-committee of the Pension Fund Committee (including elected and co-opted members)
 - c) Members (employer and member representatives) of the Local Pension Board
 - d) Officers of Surrey County Council involved in the management and governance of the Fund
 - e) Third parties including advisers and suppliers to the Fund (including to the Committee, any sub-committee, the Board and Officers).
5. The Policy recognises the Council's dual role of the Fund administering authority and as one of (circa) 500 employers in the Fund (albeit it is the largest employer). It provides specific examples of circumstances where a conflict may arise. This addresses the recommendation of the Council's Internal Audit and the outcomes of the Scheme Advisory Board's Good Governance Review.
6. The Policy recognises the Council's Constitution as it applies to Councillors, Members of the Committee and Board, and officers and advisors. As such it is not intended that this Policy conflicts with the provisions dealing with conflicts under the constitution of the Council.
7. The Policy was presented to Local Pension Board at its meeting on 21 February 2025 for comment and noting.

CONSULTATION:

8. The Chair of the Pension Fund Committee and Chair of the Local Pension Board have been consulted on this report.

RISK MANAGEMENT AND IMPLICATIONS:

9. Any relevant risk related implications have been considered and are contained within the report.

FINANCIAL AND VALUE FOR MONEY IMPLICATIONS:

10. Any relevant financial and value for money implications have been considered and are contained within the report. The cost of the resources necessary for implementing the changes recommended above and for delivering the administering authority role is met from the pension fund (under Regulation 4(5) of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009).

LEGAL IMPLICATIONS:

11. The Council's Legal and Democratic Services teams have been consulted, and their comments and amendments have been included in the proposed Policy.

EQUALITIES AND DIVERSITY:

12. There are no equality or diversity issues.

OTHER IMPLICATIONS:

13. There are no other implications.

NEXT STEPS:

14. The following steps are planned:
 - a) On approval, the Policy will be formally adopted.

Contact Officer:

Colette Hollands, Head of Accounting and Governance

Annexes:

1. Surrey Pension Fund Conflicts of Interest Policy – Annexe 1

Sources/Background papers:

1. None

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