Cronfa Bensiwn
GWYNEDD
Pension Fund

Conflicts of Interest Policy

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1. Executive Summary

This report sets out a Conflicts of Interest Policy for the Gwynedd Pension Fund. It provides a clear framework for how actual, potential and perceived conflicts should be identified, declared, recorded, managed and reviewed.

The policy is designed to support robust governance, transparent decision-making and compliance with the expectations applying to Local Government Pension Scheme funds. It applies to members of the Pensions Committee, Pension Board members, relevant officers, advisers, managers, suppliers and any other person involved in Fund business.

2. Purpose and Scope

The purpose of this policy is to ensure that conflicts of interest are managed consistently, proportionately and transparently across the governance, management, administration and advisory arrangements of the Gwynedd Pension Fund.

The policy applies to:

- Members of the Pensions Committee.
- Members of the Pension Board.
- Officers of Cyngor Gwynedd involved in the Fund which includes the Head of Finance, Monitoring Officer and Senior LGPS Officer.
- Investment, actuarial, legal, governance, administration, benefits, procurement, accounting, audit and stewardship advisers.
- External managers, consultants, suppliers and service providers.
- Representatives of participating employers when involved in Fund business.
- Any other person invited to participate in Fund decision-making, review or advisory activity.

The policy should be read alongside the Fund's Governance Policy Statement, Investment Strategy Statement, Funding Strategy Statement, Administration Strategy, Communications Policy, Risk Management Policy, Cyngor Gwynedd's Constitution, Member Code of Conduct, Officer Code of Conduct, procurement rules, gifts and hospitality arrangements and whistleblowing procedures.

3. Legislative and Governance Context

Cyngor Gwynedd is the Administering Authority for the Gwynedd Pension Fund. The Fund's governance responsibilities are exercised through delegated arrangements, including the Pensions Committee and the Pension Board.

The Pensions Committee has delegated responsibilities including investment strategy, monitoring investment arrangements, certain pension administration decisions and scrutiny of the Fund's financial affairs.

The Pension Board assists the Administering Authority in securing compliance with LGPS regulations, other legislation and requirements imposed by The Pensions Regulator, and in supporting effective and efficient governance and administration of the Fund.

The principal legal and regulatory framework includes:

- The Local Government Pension Scheme Regulations 2013.
- The Public Service Pensions Act 2013.

- The Pensions Act 2004.
- The Pension Schemes Act 2026
- The Pensions Regulator's General Code of Practice.
- Relevant statutory guidance for LGPS administering authorities in England and Wales.
- Cyngor Gwynedd's Constitution, codes, protocols and local governance requirements.

Members of the Pensions Committee

In addition to the requirements of this Policy, all members and co-opted members of the Pensions Committee have an overriding requirement to follow and abide by Cyngor Gwynedd's Members' Code of Conduct. The Code contains provisions relating to personal interests, personal and prejudicial interests, their disclosure and limitations on members' participation where they have any such interest. Accordingly, for those members, disclosures under this policy are in addition to disclosures under the Code of Conduct.

Employees

Cyngor Gwynedd officers are required to adhere to Cyngor Gwynedd's Employees' Code of Conduct which includes requirements in relation to the disclosure and management of personal and pecuniary interests, and the provisions of this Policy do not override or remove those obligations.

4. Definition of a Conflict of Interest

For the purposes of this policy, a conflict of interest is any situation in which a person's ability to act solely in the interests of the Fund, or to carry out Fund-related duties objectively, could be impaired or could reasonably be perceived to be impaired by another interest or duty.

Type	Meaning	Example
Actual conflict	A direct and current conflict between Fund responsibilities and another interest.	A Committee member is involved in appointing an adviser and has a financial interest in one of the bidding firms.
Potential conflict	Circumstances that could develop into an actual conflict.	An officer involved in procurement is discussing future employment with a potential bidder.
Perceived conflict	A reasonable person could believe judgement may be influenced, even if the person considers they can act impartially.	A Board member scrutinises a supplier where a close family member holds a senior role.
Competing duty	A person owes duties to more than one organisation or group.	A councillor participates in Fund business while also holding responsibilities in a participating employer body.

Conflicts may be financial or non-financial. A non-financial interest can still be significant if it could influence, or appear to influence, a person's judgement.

5. Governance Principles

All individuals covered by this policy must:

1. Act honestly, objectively and in good faith.
2. Put the interests of the Fund, scheme members and beneficiaries first when carrying out Fund responsibilities.
3. Avoid situations where personal interests, external roles or other duties could improperly influence Fund business.
4. Declare conflicts at the earliest opportunity.
5. Consider whether a reasonable person could perceive that a conflict exists.
6. Comply with all decisions made under this policy to manage a conflict.
7. Protect confidential information.
8. Not use their position for personal gain or to benefit another person or organisation improperly.
9. Seek advice if they are unsure whether a conflict exists.
10. Keep declarations up to date.

Some interests are inherent in the LGPS structure. For example, a person may be a scheme member, an elected member, an employer representative or a member representative. Such interests do not automatically prevent involvement in Fund business, but they must be declared and managed where relevant to a particular matter.

6. Roles and Responsibilities

Role	Key responsibilities
Pensions Committee members	Declare interests in accordance with this policy and Cyngor Gwynedd's Member Code of Conduct; review agendas and reports in advance; declare conflicts at meetings; comply with the Chair's ruling on participation, withdrawal or voting; and maintain confidentiality.
Pension Board members	Declare interests on appointment and during their term; ensure that they do not have a conflict that would prejudice their ability to assist the Administering Authority; review meeting papers in advance; and comply with decisions on managing conflicts.
Officers	Declare relevant personal, financial, professional or other interests; comply with officer conduct requirements; ensure processes are fair and transparent; maintain the Conflicts Register where required; and escalate concerns promptly.
Head of Finance (s151)	Ultimately responsible for the proper administration of Cyngor Gwynedd, the administering authority's financial affairs.

Senior LGPS Officer	Responsible for ensuring the administering authority is appropriately managed and resourced in respect of all matters of the LGPS. This includes administration, investment and governance.
Monitoring Officer	Advise on member conduct, constitutional requirements and standards matters where relevant to conflicts of interest.
Advisers, managers and service providers	Disclose conflicts before appointment and throughout the contract; explain safeguards; notify the Fund promptly if new conflicts arise; comply with professional standards; and avoid improper use of confidential information.
Pooling company (WPP IM Co)	Disclose conflicts before appointment and throughout the contract; explain safeguards; notify the Fund promptly if new conflicts arise; comply with professional standards; and avoid improper use of confidential information.

7. Identifying, Declaring and Recording Conflicts

7.1 When conflicts should be considered

Conflicts should be actively considered:

- On appointment to a Committee, Board, officer or adviser role.
- Before accepting an advisory, management or supplier appointment.
- At the start of each Committee, Board or working group meeting.
- When personal, professional or financial circumstances change.
- During procurement, tender evaluation and contract management.
- During employer admission, exit, contribution, covenant or funding strategy matters.
- During pension administration decisions, appeals and complaints.
- When dealing with confidential or commercially sensitive information.
- During activity connected to investment pooling or collaborative arrangements.
- Members and co-opted member of the Pensions Committee are required by the Members Code of Conduct in all matters to consider whether they have a personal interest and whether the Code requires them to disclose that interest.

7.2 Declaration process

All individuals covered by this policy must complete a Declaration of Interests form on appointment, annually, whenever their circumstances change and whenever requested by the Fund. Individuals must submit a nil return where they have no interests to declare.

At the start of each formal meeting, the Chair will ask members and attendees to declare any interests in relation to the agenda. Any declarations and management actions will be recorded in the minutes. All members and co-opted members of the Committee are required to register any interests declared at the meeting in accordance with the requirements of the Members' Code of Conduct.

7.3 Conflicts Register

The Fund will maintain a Conflicts of Interest Register. The register should include the name of the individual or organisation, role, nature of the interest, whether the conflict is actual, potential or perceived, date declared, relevant matter, action taken, review date and date removed where applicable.

8. Managing Conflicts

The appropriate management action will depend on the nature, seriousness and context of the conflict. The aim is not necessarily to eliminate all conflicts, but to ensure that they are disclosed, assessed and managed in a proportionate and auditable way.

Management action	When it may be appropriate
Record only	Where the interest is minor and does not affect the matter under consideration.
Participation with safeguards	The individual may participate, but with limitations such as not receiving confidential information.
Non-participation in discussion	The individual may remain in the meeting but not contribute to the relevant item.
Withdrawal from the meeting	The individual leaves the room for the relevant item.
No voting	The individual is excluded from voting on the relevant matter.
Restriction from papers	The individual does not receive certain papers, reports or confidential information.
Removal from process	The individual is removed from a working group, procurement panel or evaluation process.
Independent advice	The Fund seeks legal, governance or other independent advice.
Alternative decision route	The matter is referred to another authorised person or body.
Resignation or contract review	In serious or persistent cases, an individual may be asked to resign from a role, or a contract may be reviewed or terminated.

8.1 Decision-making on conflicts

- Members and co-opted members are personally responsible for considering which provisions of the Code of Conduct may apply in any given situation and to act in accordance with their obligations under the Code. Nothing in this Policy overrides or removes that obligation.
- For Committee meetings, the Chair of the Pensions Committee, advised by the Monitoring Officer or relevant officer, will determine how a declared conflict should be managed.
- For Pension Board meetings, the Chair of the Board, advised by the Monitoring Officer or relevant officer, will determine how a conflict should be managed.

- For officer conflicts, the Senior LGPS Officer, Head of Finance or Monitoring Officer will determine the appropriate management action.
- For adviser or supplier conflicts, the Senior LGPS Officer, in consultation with the Head of Finance, Monitoring Officer or legal advisers where appropriate, will determine the appropriate action.
- Where the Chair has a conflict, the Vice-Chair or another appropriate person will determine how the conflict should be managed.

9. Specific Risk Areas

9.1 Gifts and hospitality

Individuals must not accept gifts, hospitality or benefits that could influence, or be perceived to influence, their judgement. All offers must be handled in accordance with Cyngor Gwynedd's relevant policies and registers. Particular care is required where offers are made by investment managers, advisers, actuaries, custodians, administrators, software providers, legal firms, employers, prospective suppliers or organisations involved in procurement or contract renewal.

9.2 Procurement and contract management

Anyone involved in scoping, evaluating, scoring, negotiating, awarding or managing Fund contracts must declare any interests in bidders, suppliers or related parties. Where a conflict is identified, the individual may be removed from the process or restricted from receiving documents.

9.3 Investment decisions

Investment decisions must be made in accordance with the Fund's Investment Strategy Statement, fiduciary responsibilities and relevant regulations. Conflicts may arise through financial interests, adviser relationships, access to market-sensitive information, political or campaigning positions, or personal relationships with investment providers.

9.4 Employer-related matters

Conflicts may arise in relation to admissions, exits, contribution rates, funding strategy, covenant assessments, cessation debts, payment plans, administration performance, data quality and discretions. A connection with an affected employer must be declared and managed.

9.5 Scheme member matters

Being a member of the LGPS does not, on its own, constitute a conflict. However, a conflict may arise where a person is involved in a decision that specifically affects their own benefits, a family member's benefits, or a small identifiable group of which they are part. Examples include appeals, ill-health matters, discretionary benefit decisions, overpayment recovery, transfers, aggregation decisions and complaints.

9.6 Confidentiality and information barriers

Confidential information obtained through Fund business must be used only for proper Fund purposes. Individuals must not share confidential information with unauthorised persons, use Fund information for personal gain, use Fund information to benefit another organisation improperly, or disclose commercially sensitive information. The Fund may establish information barriers, restrict access to papers or exclude individuals from discussions where necessary.

9.7 Advice and implementation

WPP IM Co provides the principal investment advice to partner funds on investment strategies and implements those strategies through underlying pooled products. A conflict may arise where pension funds

have different investment beliefs but implementation of a common approach would be beneficial to WPP IM Co.

10. Breaches and Reporting

A breach of this policy may include failure to declare an interest, incomplete or misleading declarations, participation in a matter despite a conflict, failure to follow a management decision, misuse of confidential information, acceptance of inappropriate gifts or hospitality, or failure by an adviser or supplier to disclose a conflict.

Breaches may be dealt with through advice or training, recording of the breach, referral to the Monitoring Officer, referral under standards or disciplinary procedures, review of Committee or Board membership, review or termination of adviser or supplier contracts, reporting to The Pensions Regulator or another body where required, and inclusion in the Fund's risk or breach reporting arrangements.

Any person who believes that a conflict has not been declared or properly managed should report the matter promptly to the Senior LGPS Officer, Head of Finance, Monitoring Officer, Chair of the Pensions Committee or Chair of the Pension Board. Concerns may also be raised through Cyngor Gwynedd's whistleblowing arrangements where appropriate.

11. Training, Monitoring and Review

Committee members, Board members and relevant officers will receive training on conflicts of interest as part of induction and ongoing training. Training should cover definitions of conflicts, declaration procedures, meeting procedures, procurement risks, investment conflicts, employer-related conflicts, gifts and hospitality, confidentiality and relevant LGPS case studies.

The Conflicts Register will be reviewed at least annually and reported to the Pensions Committee and Pension Board as appropriate. This policy will be reviewed at least every three years, or earlier if legislation, statutory guidance, regulatory expectations, governance arrangements or a significant conflict incident require it.

12. Publication

This policy should be made available to Committee members, Board members, officers, advisers, service providers, participating employers, scheme members and other stakeholders where appropriate. Publication supports transparency and confidence in the Fund's governance arrangements.

Appendix A: Declaration of Interests Form

This form should be completed on appointment, annually, whenever circumstances change and whenever requested by the Fund.

Name	
Role	
Organisation	
Date of declaration	
Employment, office or profession	
Directorships, partnerships or business interests	
Financial interests	
Roles with participating employers	
Adviser, supplier or investment connections	
Personal relationships, gifts and hospitality, or other interests	

Declaration: I confirm that the information provided is complete and accurate to the best of my knowledge. I undertake to update this declaration promptly if my circumstances change.

Signed: _____ Date: _____

Appendix B: Meeting Declaration Procedure

At the start of each meeting, the Chair should ask:

> "Are there any declarations of interest in relation to the items on today's agenda?"

Where an interest is declared, the minutes should record the name of the individual, agenda item, nature of the interest, whether the interest is actual, potential or perceived, and the action taken to manage the conflict.

Example minute wording: Councillor [Name] declared a potential conflict of interest in relation to agenda item [x], due to [brief reason]. Following advice from the Monitoring Officer, Councillor [Name] remained in the meeting but did not participate in the discussion or vote on the item.

Appendix C: Examples of Conflicts and Management Actions

Scenario	Conflict risk	Potential management action
Committee member connected to an employer	A contribution-rate or funding decision affects an employer with which the member has a senior role.	Declare the interest, do not participate in the discussion and withdraw from the vote.
Adviser acting for more than one LGPS fund	Advice may be influenced by obligations to another fund involved in the same opportunity.	Require disclosure, review safeguards and consider independent advice.
Officer with family connection to supplier	Tender evaluation could be perceived as compromised.	Remove the officer from the procurement panel and restrict access to tender documents.
Board member who is a scheme member	General LGPS membership may be relevant but does not normally prevent participation.	Record the interest. Further action only if the matter specifically affects the individual or a small identifiable group.
Hospitality from investment manager	Hospitality shortly before a contract review may appear to influence judgement.	Declare the offer and decline unless approved as proportionate under gifts and hospitality rules.

Meetings of the Pensions Committee

Members and co-opted member of the Pensions Committee have a duty, under the Members Code of Conduct, in all matters to consider whether they have a personal interest under the Code, and whether the Code requires them to disclose that interest. Meetings of the Pensions Committee shall follow Cyngor Gwynedd's established procedure for declaring and registering personal interests.