Guideline No. 4: Pension Plan Governance

Pension Plan Administrator Governance Self-Assessment Questionnaire

CAPSA has prepared the Pension Plan Administrator Governance Self-Assessment Questionnaire to help you, the plan administrator, assess how successfully your plan follows best practice governance principles.

You can use the questionnaire to determine which principles you have already instituted and which steps to take to improve the governance of your pension plan. To make the best use of the questionnaire, when you answer a question **Yes**, document the sources of the answer. When you answer **No**, note the areas that need more work and what you need to do to change the response to **Yes**.

Plan administrators may adapt the questionnaire to suit the needs of their pension plans.

The questionnaire should be completed and then reviewed regularly for purposes of continuous improvement. You may wish to appoint an individual to co-ordinate the completion of the questionnaire. This individual may wish to get help from those who have the best knowledge of particular issues. The primary responsibility for completing the questionnaire remains with you. You should approve the completed questionnaire. We recommend you complete or review and update the questionnaire annually.

The completed questionnaire **does not** have to be filed with the regulator of your pension plan, but should be kept on file for your future reference.

Self-Assessment Questionnaire

Principle 1: Fiduciary responsibility	Response	Comments /Actions / Where Documented	Timeframes: Implemented / Last Reviewed
a) Have you identified your fiduciary and other responsibilities to plan members and beneficiaries (i.e. those members currently accruing a pension, those who are in receipt of a pension, and any others who may be entitled to a benefit from the plan)?	☐ Yes ☐ No		
b) Have you identified any responsibilities to other stakeholders?	☐ Yes ☐ No		
c) Do any delegates have fiduciary duties? If yes, has the fiduciary role been clearly identified and communicated to the delegates?	☐ Yes ☐ No ☐ Yes ☐ No		
d) Is there a clear delineation between the plan administrator and other roles?	☐ Yes ☐ No		

Principle 2: Governance framework	Response	Comments /Actions / Where Documented	Timeframes: Implemented / Last Reviewed
Have you established and documented a governance framework for the administration of the pension plan?	☐ Yes ☐ No		

Principle 3: Roles and responsibilities	Response	Comments /Actions / Where Documented	Timeframes: Implemented / Last Reviewed
a) Have you identified your roles and responsibilities, including any necessary delegation, for the effective governance of the pension plan?	☐ Yes ☐ No		
b) Have you clearly documented expectations for yourself and each of your delegates?	☐ Yes ☐ No		

	Response	Comments /Actions / Where Documented	Timeframes: Implemented / Last Reviewed
c) Do you appropriately document decisions related to the pension plan?	☐ Yes ☐ No		

Principle 4: Performance monitoring	**Response**	**Comments /Actions / Where Documented**	**Timeframes: Implemented / Last Reviewed**
a) Have you established and documented clear measures for assessing the performance of all participants in the governance process?	☐ Yes ☐ No		
b) Do you have a regular performance monitoring, review and remedial process for all participants in the governance process?	☐ Yes ☐ No		

Principle 5: Knowledge and skills	**Response**	**Comments /Actions / Where Documented**	**Timeframes: Implemented / Last Reviewed**
a) Have you established an ongoing process to identify and fill any gaps in the knowledge and skills needed for the effective governance and administration of the pension plan?	☐ Yes ☐ No		
b) Do you, together with all delegates, have the necessary qualifications, resources and experience?	☐ Yes ☐ No		

Principle 6: Governance information	**Response**	**Comments /Actions / Where Documented**	**Timeframes: Implemented / Last Reviewed**
Have you established and documented a process to obtain and provide to governance participants appropriate information to carry out your fiduciary and other responsibilities?	☐ Yes ☐ No		

Principle 7: Risk management	**Response**	**Comments /Actions / Where Documented**	**Timeframes: Implemented / Last Reviewed**
a) Have you identified, assessed and prioritized the pension plan's risks?	☐ Yes ☐ No		

b) Do you have a continuous process to monitor and manage these risks?	☐ Yes ☐ No		

Principle 8: Oversight and compliance	**Response**	**Comments /Actions / Where Documented**	**Timeframes: Implemented / Last Reviewed**
a) Have you identified the legislative requirements, plan documents and any regulatory or plan-specific policies that apply to the pension plan?	☐ Yes ☐ No		
b) Do you have a documented process to ensure you comply with legislative requirements and pension plan documents and policies? If yes, does this process include a regular review to monitor changes to support future compliance?	☐ Yes ☐ No ☐ Yes ☐ No		

Principle 9: Transparency and accountability	**Response**	**Comments /Actions / Where Documented**	**Timeframes: Implemented / Last Reviewed**
Have you established and documented a communication process that: a) provides plan members, beneficiaries and other stakeholders with access to information about the pension plan as required by applicable legislation as well as any other information that you have identified as appropriate?	☐ Yes ☐ No		
b) informs plan members and beneficiaries about the process for asking questions and raising concerns?	☐ Yes ☐ No		
c) communicates how important decisions are made?	☐ Yes ☐ No		
d) informs members about the risks, benefits, options and responsibilities of membership in the pension plan?	☐ Yes ☐ No		

Principle 10: Code of conduct and conflict of interest	Response	Comments /Actions / Where Documented	Timeframes: Implemented / Last Reviewed
a) Do you have a code of conduct that sets out the expected behaviours for you as the plan administrator and your delegates?	☐ Yes ☐ No		
b) Does your code of conduct incorporate a conflict of interest policy that identifies and addresses potential conflicts of interest that may arise in particular circumstances of your pension plan, whether actual or perceived?	☐ Yes ☐ No		
c) Do your delegates have a code of conduct that incorporates a conflict of interest policy?	☐ Yes ☐ No		
Do you have processes in place to receive appropriate disclosure of conflicts and any breaches of the code of conduct?	☐ Yes ☐ No		

Principle 11: Governance review	Response	Comments /Actions / Where Documented	Timeframes: Implemented / Last Reviewed
a) Have you established and documented a process for a regular review of your pension plan's governance?	☐ Yes ☐ No		
b) Does your governance review process include methods to address identified governance shortfalls?	☐ Yes ☐ No		

Completed by:

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Name

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Title

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Date

Approved by: (if different)

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Name

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Title

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Date