

# Equality, Equity, Diversity and Inclusion (EEDI) Policy



West  
Northamptonshire  
Council



Cambridgeshire  
County Council

Administered in partnership

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## 1. Introduction and overriding principles

- 1.1 This is the Equality, Equity, Diversity and Inclusion (EEDI) Policy of Cambridgeshire Pension Fund managed by Cambridgeshire County Council as the Administering Authority.
- 1.2 Cambridgeshire County Council and West Northamptonshire Council work in partnership to administer the Cambridgeshire Pension Fund. Under this arrangement West Northamptonshire Council is the lead authority shared service partner.
- 1.3 The Committee, Board and Officers of the Cambridgeshire Pension Fund are committed to integrating best practice in EEDI in the governance of the Fund.
- 1.4 The Committee, Board and Officers of the Cambridgeshire Pension Fund believe that the consideration of EEDI issues is key to successful governance and ensuring the objectives of the Fund are met, particularly to ensure:
  - Quality decision making
  - Services for members, including communications, take into account the diversity and differing needs of the membership
- 1.5 This policy focuses on creating a climate and culture which recognises the importance of diversity. The Fund will not discriminate against anyone because of: age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race, religion or belief, sex, or sexual orientation as specified by law. In addition, the Fund also recognises the importance of diversity in the following areas (this list may not be exhaustive), culture, working style, thought, education, social background, special needs, neurodiversity or any other circumstance of those involved in the Fund's governance.
- 1.6 The Fund will ensure that all Committee and Board meetings, and Fund operations, take place in a spirit of inclusion, namely a positive culture that is tolerant, respectful to all, and encourages all to participate fully in their role and have access to career development opportunities, without concern that any perceived differences will inhibit them doing so.
- 1.7 This policy is mindful of the requirements of the Pension Regulator's Equality and Diversity Guidance issued in March 2023. The guidance outlines principles for how Equality, Diversity and Inclusion (EDI) issues should be approached. In addition, the publication of the Pension Regulator's General Code of Practice in January 2024 brought further focus to EDI issues.
- 1.8 This policy also aligns with the Cambridgeshire County Council Equality, Diversity and Inclusion Strategy 2023-2027.
- 1.9 Throughout the policy, the acronyms 'EEDI' and 'EDI' are used interchangeably, particularly in the context of the Pensions Regulator's guidance. The Fund has introduced 'Equity' into this policy as it believes that equity is an important aspect of achieving the objectives of this policy and that promoting equity will be a key theme in the developing agenda in the LGPS and Public Sector environment.

## 2. Objectives

### Fund:

2.1 The Funds' objectives related to this policy are as follows:

- To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator's Code of Practice.
- To ensure individuals responsible for managing the Fund and delivering its services have the appropriate knowledge and expertise.
- To manage the Fund in a fair and equitable manner, and manner and be accountable to the Fund's stakeholders.
- To continually measure and monitor success against the Fund's objectives.
- To promote the scheme and ensure members understand the benefits provided.
- To deliver clear, inclusive, accessible communications to stakeholders, including up-to date information in order that informed decisions can be made.
- To seek regular feedback from stakeholders and use that feedback to help shape Fund administration

### Policy:

2.2 The EEDI objectives related to this policy are as follows:

- To promote awareness and understanding.
- To promote transparency.
- To promote engagement through inclusive communications.
- To seek a diverse and inclusive Pension Committee, Investment Sub Committee and Local Pension Board.
- To ensure Fund documentation aligns with the EEDI principles of the Fund.
- To ensure that Environmental, Social and Governance (ESG) factors, including EEDI, are considered in investment decision-making, whilst maintaining fiduciary duty.

## 3. Purpose of this Policy

3.1 The purpose of the policy is to set out the commitment and approach of the Cambridgeshire Pension Fund to EEDI, ensuring where possible, those involved in managing the Fund are comprised of individuals with a broad range of characteristics, life experiences, expertise and skills leading to improved customer journey experiences for our members.

## 4. Scope

4.1 The policy applies to:

- officers of the Fund.
- members of the Pension Committee.
- members of the Pension Board.
- employers of the Fund.
- service providers.
- professional advisors.

## 5. Effective date

5.1 This policy was first approved by the Pension Fund Committee on 18 June 2025.

## 6. Review

6.1 This policy will be reviewed by Fund Officers annually and by the Pension Fund Committee every three years, and if necessary, more frequently to ensure it remains accurate and relevant.

Date of review	Effective Date	Type of review
Due June 2026		Officer

## 7. Legislative and related context

### Equality Act 2010

7.1 The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. Within the Act there is a public sector Equality Duty that came into force across Great Britain on 5 April 2011. It means that public bodies have to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees.

7.2 It also requires that public bodies have due regard to the need to:

- eliminate discrimination.
- advance equality of opportunity.
- foster good relations between different people when carrying out their activities.

### The Pensions Regulator

7.3 The Pensions Regulator guidance on EDI suggests that the administering authority should develop and maintain an EDI policy which includes:

- an agreed definition of EDI.
- the EDI aims of the Fund.
- an EDI training plan for the Fund.

7.4 The Pensions Regulator General Code of Practice also includes expectations where it is practical to do so within the governance arrangements of local authority pension scheme funds. The Cambridgeshire Pension Fund will review these in line with compliance against the Code.

## **Cambridgeshire County Council Equality, Diversity and Inclusion (EDI) Strategy**

- 7.5 The EDI strategy enables the council to achieve its vision and ambitions so that Cambridgeshire can become greener, fairer, and more caring for the people and communities we serve and support.
- 7.6 The strategy sets out three themes:
1. Our workforce: Foster an inclusive, supportive and safe working environment that attracts and retains diverse people who feel valued, respected, and empowered.
  2. Our communities: Further understand and work with our diverse communities across Cambridgeshire, developing local solutions which address the needs of our communities.
  3. Our services: Ensure people who use our services and residents have good quality public services that meet the diverse needs of our communities
- 7.7 This policy aims to support these themes in relation to activities undertaken by the Cambridgeshire Pension Fund where possible.

## **8. Cambridgeshire Pension Fund definitions**

### **Equality**

- 8.1 Equality is about ensuring that every individual has an equal opportunity to make the most of their lives and talents. No one should have poorer life chances because of the way they were born, where they come from, what they believe, or whether they have a disability. The Fund will seek to ensure that all scheme members, employers and those involved in managing the Fund have equal access to appropriate information and support.

### **Equity**

- 8.2 Equity and equality are interconnected concepts. Equity involves recognising that different people have different needs, experiences, and challenges, and that treating everyone the same is not sufficient to achieve fairness.
- 8.3 The Fund will seek to identify barriers and biases and take targeted action where viable to overcome specific inequalities, discrimination, disadvantages and marginalisation experienced by certain groups and individuals, including the protected characteristics under the Equality Act 2010. In some circumstances, people need to be treated differently to achieve meaningful equality of opportunity.

### **Diversity**

- 8.4 Diversity means variety. A diverse group is heterogenous, which means its component parts are different.

In the UK, it is illegal to discriminate against someone on the basis of certain protected characteristics. The Equality Act 2010 prohibits less favourable treatment on the basis of nine protected characteristics - Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation. It is also worth noting that everyone is different in a variety of visible and non-visible ways therefore 'diversity' captures differences which may not be immediately apparent upon meeting someone, for instance, sexual orientation, care experience, religion or belief, neurodiversity, socio-economic background and many forms of disability, including mental health conditions, albeit not all listed above would be classed as a protected characteristic.

- 8.5 The Fund will seek to recognise, respect and value differences in people leading to improved customer journey outcomes.

### **Inclusion**

- 8.6 Inclusion refers to an individual's experience within their workplace and in society, and the extent to which they feel respected, valued, and included. Inclusion means capturing the voices of all, allowing people to fully participate, irrespective of their individual characteristics. Inclusion is positively embracing differences to create a group where different perspectives and opinions are valued and encouraged.
- 8.7 The Fund will seek to ensure that a culture of inclusiveness is applied across the Committee and Board to enable effective decision making leading to improved customer journey outcomes.

## **9. Delivery**

- 9.1 The EEDI action plan sets out the Funds approach in the following areas:

- Training.
- Fund documentation – EEDI specific.
- Fund documentation – review to ensure align with EEDI approach.
- Fund appointments.
- Role of the Chair.
- Member communications.
- Investment decisions.
- Managing advisors and suppliers.

- 9.2 Details against each action can be found in Annex 1.

## **10. Monitoring**

- 10.1 Progress against the plan will be presented to the Pension Fund Committee and Pension Fund Board via Business Plan Updates at each meeting or where required as a separate report.

## **11. Reporting**

- 11.1 Full Council will have oversight of the EEDI outcomes via the Pension Committee & Local Pension Board Annual Reports.

## **12. Contact**

- 12.1 If you require further information about anything in or related to this EEDI Policy, please contact:

Michelle Oakensen  
Governance & Regulations Manager  
[Michelle.oakensen@westnorthants.gov.uk](mailto:Michelle.oakensen@westnorthants.gov.uk)

## Annex 1 - Equality, Equity, Diversity and Inclusion Actions.

Area	CPF Action
<p><b>Training</b></p> <ul style="list-style-type: none"> <li>- Support Pension Fund Committee, Investment Sub-Committee and Local Pension Board Members and Fund Officers to build and develop their EDI knowledge and understanding through regular training.</li> </ul>	<ol style="list-style-type: none"> <li>1. Introductory EDI training for all Pension Fund Committee/Investment Sub Committee members, Local Pension Board members.</li> <li>2. Fund Officer training – identify what Administering Authority provide Officers.</li> <li>3. Identify what additional training requirements (specific to the Fund) are needed for Officers (e.g., supplement with relevant training from item 1 above where required).</li> <li>4. Identify approach to EDI training going forward in terms of how often to add to training plan and also consider what information needs to be added to induction training plans.</li> </ol>
<p><b>Fund documentation – EDI specific</b></p> <ul style="list-style-type: none"> <li>- EDI definition.</li> <li>- EDI principles leading to EDI objectives.</li> <li>- Incorporating those objectives in a Fund-specific EDI policy.</li> </ul>	<ol style="list-style-type: none"> <li>1. Agree a definition of EDI for CPF</li> <li>2. Devise a list of EDI principles for CPF</li> <li>3. Build EDI principles into EDI objectives for a Fund-specific EDI Policy</li> <li>4. Determine timeline to develop a Fund-specific EDI Policy</li> </ol>
<p><b>Fund documentation – review to ensure aligns with EDI approach</b></p> <ul style="list-style-type: none"> <li>- <b>Terms of Reference</b> for Committees and Board (e.g., consider appointment decision makers/any appointment panel role, terms of office, reappointments etc with EDI lens).</li> <li>- <b>Communications Strategy and Communication Plan</b> (e.g., consider EDI requirements are being embedded in Fund’s communication approach).</li> <li>- <b>Administering Authority Discretions Policy</b> (e.g., considering EDI definition/principles aligns with Fund approach to making discretionary decisions).</li> </ul>	<ol style="list-style-type: none"> <li>1. Review Terms of references in line with EDI principles and determine if review needed ahead of regular review cycle.</li> <li>2. Review Communication Strategy and Communication Plan against EDI principles.</li> <li>3. Review Discretions Policy against EDI principles.</li> <li>4. Review ISS/RI beliefs against EDI principles.</li> </ol>

## Annex 1 - Equality, Equity, Diversity and Inclusion Actions.

<ul style="list-style-type: none"> <li>- <b>Investment Strategy Statement (ISS) and RI Beliefs</b> (i.e., considering EDI definition/principles aligns with Fund ISS and RI beliefs).</li> </ul>	
<p><b>Fund appointments</b></p> <ul style="list-style-type: none"> <li>- Encourage and maintain a diverse and inclusive Pension Fund Committee, Investment Sub-Committee and Local Pension Board, through open recruitment and the identification and removal of potential barriers to become a member of these Committees and Board.</li> <li>- Consider EDI from a Fund perspective when recruiting Officers.</li> </ul>	<ol style="list-style-type: none"> <li>1. Regularly review the Committees and Board membership to ensure a diverse spread of members with varied skills and experience by including questions on EDI in effectiveness reviews or training needs assessments carried out for Committees and Board.</li> <li>2. Consider whether EDI is embedded within WNC processes and training.</li> </ol>
<p><b>Role of the Chair</b></p> <ul style="list-style-type: none"> <li>- Be able to demonstrate elements of skills in debating, challenging, and negotiating with a particular ability to gather and understand diverse views.</li> <li>- Whilst displaying a balanced approach by treating members with respect and taking into consideration different viewpoints to reach a consensus.</li> </ul>	<ol style="list-style-type: none"> <li>1. Consider additional training for Chair.</li> <li>2. Consider any relevant requirements that might need to be reflected in Terms of Reference (aligns with review above).</li> </ol>
<p><b>Member communications</b></p> <ul style="list-style-type: none"> <li>- Encourage member engagement through the development of inclusive communications.</li> <li>- Where possible, ensure that web content follows <a href="#">Web Content Accessibility Guidelines</a> (WCAG) 2.2.</li> <li>- Obtain and review feedback from scheme members and scheme employers on Fund communication.</li> </ul>	<ol style="list-style-type: none"> <li>1. Regularly test communications against a scheme specific definition of EDI (and aligns with review of Strategy and Plan above).</li> <li>2. Check alignment with web requirements.</li> <li>3. Asking members and employers for their views on how the fund reflects its EDI values in the communications we provide to them.</li> </ol>

**Annex 1 - Equality, Equity, Diversity and Inclusion Actions.**

<p><b>Investment decisions</b></p> <ul style="list-style-type: none"><li>- Consider Environmental, Social and Governance aspects of investment decisions.</li><li>- Awareness of diversity and inclusion good practice such as if scheme investments are aligned with member's responsible investment preferences or religious beliefs.</li></ul>	<ol style="list-style-type: none"><li>1. Report against the principles of the UK Stewardship Code (Principle 2; explain governance and workforce resourcing)</li><li>2. Consider collecting member views on responsible investment issues.</li><li>3. Review AVC offerings periodically.</li></ol>
<p><b>Managing advisers and suppliers</b></p> <ul style="list-style-type: none"><li>- Consider the EDI policies of advisers and other third parties the Fund work with</li></ul>	<ol style="list-style-type: none"><li>1. Further engagement with LGPS pool (ACCESS) and asset managers.</li><li>2. Include questions on EDI for potential suppliers in procurement processes.</li></ol>