

**HAMPSHIRE COUNTY COUNCIL****Decision Report**

<b>Decision Maker:</b>	Pension Fund Panel and Board
<b>Date:</b>	28 September 2015
<b>Title:</b>	Governance – Appointments Policy for the Pension Fund Panel and Board
<b>Reference:</b>	6950
<b>Report From:</b>	Director of Corporate Resources - Corporate Services

**Contact name:** Andrew Bouflower

**Tel:** 01962 847407

**Email:** andrew.bouflower@hants.gov.uk

## **1. Purpose**

- 1.1 The Pension Fund Panel and Board was established by the County Council at its meeting on 16 July 2015. The new committee was created pursuant to new regulations for Pension Fund Governance published on 28 January 2015 and following the County Council receiving approval from the Department of Communities and Local Government (DCLG) to combine its existing Pension Fund Panel with its Pension Board.
- 1.2 As this is the first meeting of the Panel and Board the committee needs to agree its Appointments Policy for Scheme Member and Employer representatives. This report outlines the decisions that are required.
- 1.3 Just prior to the County Council meeting on 16 July 2015, the Director of Corporate Resources received a letter from the Trade Union UNISON outlining concerns about Hampshire's formation of a Joint Panel and Board. This report shares those concerns with the Panel and Board and outlines how the County Council is complying with relevant regulations and legislation.

## **2. Appointments to the Panel and Board**

- 2.1 The draft appointments policy (contained in Appendix 1) is being reported to the Panel and Board for their approval. The composition of the new Joint Pension Fund Panel and Board as outlined in the draft appointments policy and in the County Council's application to DCLG is as follows:

9 County Councilors (appointed by the County Council)

3 scheme member representatives:

- 1 pensioner representative
- 1 employee representative
- 1 deferred representative to be appointed
- 1 substitute to be appointed

3 employer representatives:

- 1 Unitary Authority representative (rotated between Southampton and Portsmouth)
- 1 District Council representative nominated by HLOWLGA
- 1 Other employer representative to be appointed
- 1 substitute (the other Unitary Authority)

- 2.2 The division of roles for employer and scheme member representatives has been designed to ensure a wide representation on the Panel and Board and to include groups that have different interests in the Pension Fund, such as deferred members and non-Local Authority employers, who have previously not had the opportunity to be involved in the governance of the Fund.
- 2.3 The draft appointments policy provides for roles to either be filled by appointments from existing bodies e.g. HLOWLGA or through an application process.
- 2.4 The draft policy sets clear time limits for roles on the committee, to ensure that there is the opportunity to spread representation between the various individuals and bodies in the Fund and to allow a reasonable opportunity for individuals and bodies to be involved in the governance of the Fund.
- 2.5 The Panel and Board continues to have roles for substitutes both for County Council members and employer and scheme member representatives. Substitute members are encouraged to attend all Panel and Board meetings, even when not acting in their capacity as substitutes and can contribute to meetings at the discretion of the Chairman. Substitute members are also encouraged to participate in the full member training programme for the Panel and Board, so that they are prepared to participate in the committee if required.
- 2.6 The role of substitutes, along with the other functions of the Panel and Board, will be assessed as part of the review of the Panel and Board's first year of activity as part of its report back to DCLG to demonstrate that it has operated effectively.

### **3. Transition arrangements**

- 3.1 Part of the County Council's application to DCLG to form a Joint Panel and Board was that all previous Pension Fund Panel members could

serve on the Panel and Board as an interim measure. At the Council meeting on 16 July 2015 as well as approving the creation of the Panel and Board, the County Council also approved all of the previous Pension Fund Panel members being appointed to the new Panel and Board.

- 3.2 The Panel and Board must decide on the steps required to change its current membership to best meet the structure defined in the draft appointments policy in line with the approval that was given by DCLG.

### **Employer Representatives**

- 3.3 **Unitary Authorities** – the Panel and Board currently has two full members from Southampton City Council and Portsmouth City Council. The draft appointments policy approved by DCLG allows for one full member from a Unitary Authority to be rotated annually between Southampton and Portsmouth, with the other member acting as the Employer Representative substitute.
- 3.4 It is recommended that Panel and Board ask the Director of Corporate Resources to write to the Chief Executives of Southampton and Portsmouth City Councils, asking them to agree by 30 November 2015 who will be the representative for the first year.
- 3.5 **District Councils** – following the retirement of Cllr Leek from Basingstoke and Deane Borough Council, the Panel and Board has one District Council representative who has been nominated by HIOWLGA and was a member of the Pension Fund Panel from 2007.
- 3.6 Following Cllr Leek's retirement the Director of Corporate Resources has written to the Leader of HIOWLGA asking for them to nominate a single representative by 30 November 2015. The time limit for the representative defined in the draft appointments policy will then begin for whoever HIOWLGA nominate, subject to the member continuing to be a District Councilor and receiving HIOWLGA's nomination.
- 3.7 **Other employer representative** – following the changes above the Panel and Board will have a vacancy for a third employer representative. As outlined in the draft appointments policy the Panel and Board will seek to fill this role with a representative from one of the large constituent groups amongst the Fund's employers, such as the education sector or community admission group, which includes voluntary organisations.
- 3.8 It is recommended that Panel and Board give delegated authority to the Director of Corporate Resources to manage an application process to appoint an employer representative from a non-Local Authority employer in the Fund.

### **Scheme member representatives**

- 3.9 **Active member** – the Panel and Board currently has a representative from the Fund’s active members, who was appointed to the Pension Fund Panel in 2007 following a request for nominations from Trade Unions. The initial term for this role was until 2010, and was then extended to 2013 and then again pending the outcome of expected changes for Pension Boards.
- 3.10 Given the time that has already been served by the current employee representative on the Pension Fund Panel, it is recommended that the opportunity to be the Panel and Board’s active scheme member representative is offered to all eligible active members and delegated authority is given to the Director of Corporate Resources to manage an application process to appoint an active member representative.
- 3.11 The draft appointments policy allows for scheme member representatives to serve for 4 years, before having to re-apply for the position and to serve a maximum of 2 terms. Given the time he has already served it is recommended that the current employee representative be allowed to apply again (should he wish) and that his existing time served on the Pension Fund Panel count as a first term, allowing for a second 4 year term.
- 3.12 **Pensioner member** – the Panel and Board currently has a representative from the Fund’s pensioners, who was appointed to the Pension Fund Panel in 2013 following a competitive application process that was open to all of the Fund’s pensioners. The appointment was due to be for a term of 4 years, after which the representative would have to apply again for a second and final term.
- 3.13 Given the relatively recent appointment it is recommended that the current pensioner representative is allowed to continue as the representative on the Panel and Board, and that this first term is extended to run for 4 years from the commencement of the Panel and Board, in line with the draft appointment policy.
- 3.14 **Deferred member and substitute scheme member** - the Panel and Board will have vacancies for a third scheme member representative and a substitute scheme member representative. As outlined in the draft appointments policy, the Panel and Board will seek to fill the third scheme member representative role with a deferred pensioner, which is a group that the Pension Fund has specific responsibilities for, but which has not previously been represented in the governance of the Fund. It is intended that the role of substitute scheme member representative would be open to all scheme members; active, deferred and pensioner members.
- 3.15 It is recommended that Panel and Board give delegated authority to the Director of Corporate Resources to manage an application process to appoint deferred scheme member and substitute scheme member

representatives.

### **Timescales**

- 3.16 If the recommendations above are agreed by the Panel and Board it is intended that all of the necessary processes take place in order that the new membership of the Panel and Board is in place for new members to attend the meeting on 18 December 2015 as observers; they would not be able to vote on any matters should this be necessary.
- 3.17 The new representatives would not be able to be appointed as full co-opted members of the County Council until their appointments are made by the County Council at its meeting on 7 January 2016.

### **4. UNISON letter**

- 4.1 The Director of Corporate Resources received the letter contained in Appendix 2 on 13 July 2015 from the Trade Union, UNISON. The letter outlines a number of concerns that Hampshire's Joint Pension Fund Panel and Board does not meet the requirements of the regulations and other legislation:
- That as a 'finance committee' defined in the Local Government Act 1972, the Panel and Board cannot contain non-County Council members.
  - Paid employees of the authority cannot be members of the County Council, again defined in the Local Government Act 1972, which would prevent County Council employees being scheme member representatives on the Panel and Board.
  - That a joint committee cannot perform both the role of discharging the functions of the Administering Authority of the Pension Fund and that of a Local Pension Board.
  - Questioning whether having nine County Councilors in addition to three employer representatives is not in the spirit of the regulations for Local Pension Boards.
- 4.2 UNISON's conclusion is that Hampshire is not complying with the regulations and legislation and should withdraw its application to DCLG for a Joint Panel and Board.
- 4.3 The compliance with the regulations and legislation was a key consideration by the Director of Corporate Resources, Deputy Monitoring Officer and other officers that wrote Hampshire's application for a Joint Panel and Board. This has been reviewed following the receipt of the letter from UNISON, and officers remain confident about the compliance of the Joint Panel and Board, which has been endorsed by DCLG's approval of the new arrangement.
- 4.4 With regard to the specific points raised by UNISON the County Council's position is as follows:

- The Pension Fund Panel and Board is not a committee for regulating or controlling the finances of the County Council. The role of regulating or controlling the finances of the County Council is performed by the County Council (setting the budget) and then by the Executive acting within the budget framework. The assets of the Pension Fund are clearly defined, held separately and are not available for use to support the activities of the County Council. Section 13 (4) (fb) of the Local Government and Housing Act specifically provides for co-opted members of the County Council to have voting rights on a committee which is the scheme manager and pension board of a scheme under Section 1 of the Public Service Pension Act 2013.
- It is correct that employees of the County Council cannot be a member of the Pension Fund Panel and Board as it is a committee of the County Council, which is captured in the Panel and Board's draft appointments policy. The active scheme member representative will therefore need to be appointed from the employees of one of the other over 300 employers in the Fund.
- The Panel and Board's terms of reference (which were part of the application that was approved by DCLG) are clear that the Pension Fund Panel and Board will act in two distinct capacities. The terms of reference make it clear that the Pension Fund Panel and Board has different powers when acting in its distinct capacities.
- The Panel and Board clearly complies with the regulations, which allow for two separate regimes; one for independent boards and one for combined committees and boards. The relevant provisions for membership of a combined committee and board are set out in Regulation 107 (4) and provide for the administering authority to designate an equal number, which is no less than four in total, of the members of the committee as employer and scheme member representatives. The County Council has gone beyond this requirement by designating six employer and scheme member representatives. The County Council members of the Panel and Board act as quasi trustees and their duty is to act in the best interests of the Pension Fund, they are not representatives of Hampshire County Council as an employer of the Pension Fund.

## **5. Recommendations**

- 5.1 That the Pension Fund Panel and Board approve the appointments policy contained in Appendix 1 and the following specific actions required to implement the full membership of the Panel and Board:
- a) the Director of Corporate Resources writes to the Chief Executives of Southampton and Portsmouth City Councils, asking them to agree by 30 November 2015 who will be the nominated Unitary Authority representative for the first year.

- b) authority is delegated to the Director of Corporate Resources to manage an application process and to recommend to the County Council for appointment:
  - an employer representative from a non-Local Authority employer in the Fund;
  - an active scheme member representative from eligible scheme members;
  - a deferred scheme member representative;
  - a substitute scheme member representative.
- c) that the current active (employee) representative be allowed to apply to be the active member representative (should he wish) and that, should he be appointed, his existing time served on the Pension Fund Panel count as a first term, allowing for a second 4 year term.
- d) that the current pensioner representative is allowed to continue as the representative on the Panel and Board, and that his first term is extended to run for 4 years from the commencement of the Panel and Board, in line with the draft appointment policy.

5.2 That the Panel and Board notes the letter received from UNISON and the County Council's position that the Panel and Board is fully compliant with all regulations and legislation.

**CORPORATE OR LEGAL INFORMATION:****Links to the Corporate Strategy**

<b>Hampshire safer and more secure for all:</b>	no
Corporate Business plan link number (if appropriate):	
<b>Maximising well-being:</b>	no
Corporate Business plan link number (if appropriate):	
<b>Enhancing our quality of place:</b>	no
Corporate Business plan link number (if appropriate):	
<b>OR</b>	
<b>This proposal does not link to the Corporate Strategy but, nevertheless, requires a decision because actions are required to continue the appropriate investment of the Hampshire Pension Fund.</b>	

**Other Significant Links**

<b>Links to previous Member decisions:</b>		
<u>Title</u>	<u>Reference</u>	<u>Date</u>
<b>Direct links to specific legislation or Government Directives</b>		
<u>Title</u>		<u>Date</u>
Public Service Pension Act 2013		25/04/2013
Local Government Pension Scheme Regulations 2014: better governance and improved accountability		10/10/2014
LGPS Advisory Board: Draft Guidance on the creation and operation of Local Pension Boards in England and Wales		17/10/2014

**Section 100 D - Local Government Act 1972 - background documents**

The following documents discuss facts or matters on which this report, or an important part of it, is based and have been relied upon to a material extent in the preparation of this report. (NB: the list excludes published works and any documents which disclose exempt or confidential information as defined in the Act.)

<u>Document</u>	<u>Location</u>
None	

## IMPACT ASSESSMENTS:

### 1. Equalities Impact Assessment:

1.1. The County Council has a duty under Section 149 of the Equality Act 2010 ('the Act') to have due regard in the exercise of its functions to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation) and those who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

#### **Due regard in this context involves having due regard in particular to:**

- a. The need to remove or minimise disadvantages suffered by persons sharing a relevant characteristic connected to that characteristic;
- b. Take steps to meet the needs of persons sharing a relevant protected characteristic different from the needs of persons who do not share it;
- c. Encourage persons sharing a relevant protected characteristic to participate in public life or in any other activity which participation by such persons is disproportionately low.

### 1.2. Equalities Impact Assessment:

1.3. Equality impacts will be taken into account in ensuring that the appointment process for selecting scheme member and employer representatives is fair and open.

### 2. Impact on Crime and Disorder:

2.1. The proposals in this report are not considered to have any direct impact on the prevention of crime.

### 3. Climate Change:

a. How does what is being proposed impact on our carbon footprint / energy consumption?

No specific impact.

b. How does what is being proposed consider the need to adapt to climate change, and be resilient to its longer term impacts?

No specific impact.

## **Scheme Member and Employer Representatives Appointments Policy**

### **1. Summary**

- 1.1. This document outlines the role of Scheme Member and Employer Representatives for the Hampshire Pension Fund Panel and Board and the means by which they will be appointed.
- 1.2. This policy covers the three Scheme Member Representatives and three Employer Representatives on the Panel and Board plus a substitute member for each group (one Scheme Member Representative substitute and one Employer Representative substitute)

### **2. Objective**

- 2.1. The objective of this policy is that the Hampshire Pension Fund has Scheme Member and Employer Representatives who are most able to contribute to the governance of the Pension Fund and represent the broadest range of the Pension Fund's scheme members and employers.

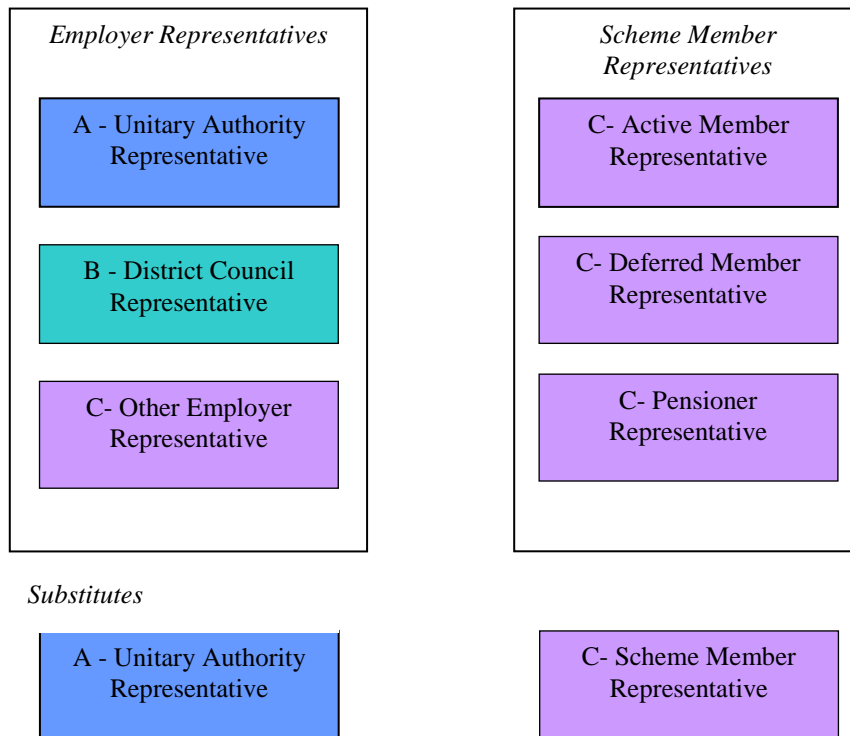
### **3. Role of the Employer and Scheme Member Representatives**

- 3.1. As members of the Hampshire Pension Fund Panel and Board, Employer and Scheme Member Representatives will be part of the committee responsible for the administration of the Local Government Pension Scheme (LGPS) in Hampshire and securing compliance with the Local Government Pension Scheme Regulations. As a committee of the County Council employees of Hampshire County Council cannot serve as members of the Panel and Board.
- 3.2. The Employer and Scheme Member Representatives will be charged with ensuring that the views of the employers/scheme members that they represent are considered in the decisions made in discharging the Panel and Board's responsibilities.
- 3.3. Employer and Scheme Member Representatives will need to be contactable and respond to questions and comments from the groups that they represent. As part of this role they will need to agree to some personal information, such as their name, contact details and a photo being published on the Pension Fund's website.
- 3.4. The Employer and Scheme Member Representatives will be required to attend a minimum of six Pension Fund Panel and Board meetings a year, plus formal Panel and Board training events. In addition as Panel and Board members Employer and Scheme Member Representatives will need to undertake training and development activities in their own time, including attending conferences, often in London.
- 3.5. The full details of the Pension Fund Panel and Board are contained in its Terms of Reference and Operating Procedures, including a link to the County

Council's Standing Orders with details of the policy for Expenses and Allowances.

#### 4. Application and Nomination Routes

- 4.1. In order to achieve the aim of having a broad representation of the Pension Fund's scheme members and employers the representative roles will be categorised as follows, with different appointment processes (A to C) for each, which are set out below.



**A – Unitary Authority Representative** – Each Unitary Authority of Southampton City Council and Portsmouth City Council will nominate an elected member to serve as their representative on the Panel and Board. The representative seat will rotate between the two cities each year (from September to August), with the city with the non-serving representative fulfilling the role of substitute Employer Representative.

Unitary Authority Representatives shall serve on the Panel and Board for as long as they continue to be an elected member of the city they are representing and they continue to receive the Unitary Authority's nomination.

**B – District Council Representative** – The Hampshire and Isle of Wight Local Government Association (HLOWLGA) will nominate an elected member from one of the 11 District Council's in Hampshire to serve as their representative on the Panel and Board.

The District Council Representative can serve for a maximum of 8 years as long as they remain an elected member of a District Council in Hampshire and continue to receive the nomination of HIOWLGA.

### **C – Other Employer Representative and Scheme Member Representatives**

Applications will be sought by the Hampshire Pension Fund for the other representative roles on the Panel and Board. Prospective applicants will be asked to complete a written application which will be assessed by officers of the Pension Fund and shortlisted applicants will be invited to interview as a final stage of the application process.

To meet the aim of ensuring broad representation from employers and scheme members priorities will be assigned in appointing to the following roles:

- An Employer Representative from one of the large constituent groups amongst the Fund's employers, such as the education sector or community admission group.
- A Scheme Member Representative from each of the three groups of members:
  1. Active member – working for an employer in the Pension Fund and contributing to the Fund.
  2. Deferred member – not yet retired and in receipt of a pension but who has previously contributed to the Fund.
  3. Pensioner – in receipt of a pension from the Fund.
- A Scheme Member Representative substitute from either of the three groups of active, deferred or pensioner.

A representative selected through an application process can serve for a 4 year term as long as they can continue to represent the employer/ scheme member group from which they originally came. At the end of their 4 year term an Employer or Scheme Member Representative can apply again, and if successful serve a maximum one further 4 year term.

## **5. Criteria for the selection of Employer or Scheme Member Representatives**

5.1. Within the priorities for representation from Employer and Scheme Member Representatives the following criteria will be used in the application process to select representatives:

- Able to represent either all employers or all scheme members.
- Has the capacity to be a member of the Pension Fund Panel and Board.
- Excellent communication and listening skills and the ability to work as part of a group.

- Good analytical skills, an aptitude for taking on new information and a commitment to continuous personal development.
- Highly numerate, ideally with a background in the Financial Sector.
- An awareness of pension fund and investment issues.
- Has no conflict of interest in holding or having held a senior management post at the Administering Authority, or a role in administering the Pension Fund; either currently or in the last 5 years.

## **6. Approval of appointments**

- 6.1. As a committee of Hampshire County Council all appointments to the Pension Fund Panel and Board via all three of the routes above (A, B and C) will be approved by the County Council according to its constitution.

Friday, 10 July 2015

Dear Carolyn

### **Hampshire County Council: LGPS Joint Pension Committee and Board**

I write to you about the proposed establishment of the LGPS joint board for your authority and request this letter be placed on the Cabinet meeting agenda please.

I understand that Hampshire County Council has obtained approval from the Department for Communities and Local Government (DCLG) to make its Pensions Fund Panel, the Local Pension Board (LPB), which it is required to establish under regulation 106 of the LGPS Regulations 2013. The possibility that a "scheme manager" for the purposes of the Public Service Pensions Act 2013 might be the LPB is envisaged by section 5(7) of the Act, provided that the scheme regulations permit such an arrangement. Regulation 106(2) does permit that, with the approval of the Secretary of State.

It would appear to us that the proposed Pension Fund Panel and Board will be both the local authority committee and the LPB at the same time. It does not seem to transmogrify from one to the other as appropriate.

Consequently, we have concerns as to whether the Pension Fund Panel meets the statutory requirements that apply to local authority committees and the requirements of the 2013 Act and the LGPS requirements that relate to LPBs at the same time, and all of the time.

### **Local Government Act 1972**

The duty of the County Council to manage and administer the Hampshire Pension Fund is a duty imposed on the County Council as a whole. If it delegates that duty to a committee, its power to do so must be identified; and it is in sections 101 and 102 of the Local Government Act 1972. These permit a local authority to discharge its functions by a committee, sub-committee, or officer of the authority; or by another local authority. Section 102(4) permits the membership of a committee to be extended to people who are not elected members of the authority, but:

1. The possibility of including non-elected members only applies where the committee concerned is not a "committee for regulating or controlling the finance of the local authority"; and
2. Membership cannot be extended to people who could not be members of the authority. That is provided for in section 104.

That duty is to perform all of the County Council's functions as an administering authority, and expressly includes the management and investment of the assets of the Hampshire Pension Fund. You will be aware that the question of ownership of an LGPS fund's assets is hotly contested, but as the law stands at the moment it is clear that they belong to the administering authority. That would make the Pensions Fund Panel and Board a committee for regulating the finance of Hampshire County Council.

As to the second point, the people who are not eligible for election to a local authority include anyone who holds any paid office or employment with the authority concerned. That is provided for in section 80(1) of the Local Government Act 1972. Employees of Hampshire County Council are therefore not eligible to be the scheme member representatives that the Pension Fund Panel. The Board terms of reference envisage that they will be. One member must be an employee according to the terms of reference.

Section 101 causes one further problem. Sub-section (4) says that any arrangement for the discharge of an authority's function by a committee cannot prevent the authority itself from exercising those functions. That means that the County Council's functions as an administering authority must be exercisable by the County Council as well as by the Pension Fund Panel and Board. Since the functions of the Pension Fund Panel and Board are indivisible into the part which are the function of the administering authority and part which is the function of an LPB, sub-section (4) cannot be given effect unless the County Council also retains the right to exercise the function of an LPB. That does not appear to be what the County Council intends and unless that distinction is drawn section 101(4) cannot be complied with.

### **The Pension Fund Panel and Board as an LPB under section 5 of the 2013 Act**

The County Council's intention is that the Pensions Fund Panel and Board will consist of nine county councillors, three member representatives and three employer representatives. Section 5 requires the regulations to provide for the establishment of an LPB which includes employer representatives and member representatives in equal numbers (without specifying what that number is).

An employer representative is defined as a person appointed *for the purpose* of representing the interests of employers. By implication, that means that the regulations cannot provide for the appointment of a certain number of employer representatives for the purpose of representing the employers' interests, and then add another number of members who also represent employer interests. Regulation 107 partially specifies the equal number: it must be no less than two employer representatives and two member representatives. It draws a distinction between LPBs which are "scheme managers" and LPBs which are not. In the former case, the employer and member representatives are *designated* as employer and member representatives; in the latter case they are *appointed* as employer and member representatives.

So there is a difference of approach between the Act and the Regulations. The Act looks at the purpose of the appointment. At least in the case where the LPB is also the scheme manager, the Regulations focus on the designation of a member as a representative of the employers or the members. If the framework of the Act is the starting point: then what is the purpose of appointing nine county councillors to the Pension fund Panel and Board – why are they there?

Looking at the role of the Pension Fund Panel and Board as defined in the terms of the 2013 Act (to advise the administering authority on compliance with the legislation and any other legal requirements), appointing a majority of LPB members whose role

it is to act as a critical friend to the very body that appointed them flies in the face of what the Act is intended to achieve.

'Designating' three members as employer representatives when nine other members 'happen' to be appointed by the scheme manager which 'happens' to be an employer is playing with words. If 'representing' the employers has any meaning separate from securing the effective management of the fund (which all LPB members are meant to achieve), then it is to be expected that the nine county councillors on the Pension Fund Panel and Board will represent the interests of Hampshire County Council, whatever their formal designation may be. Their core role as county councillors is to represent the interests of the council, as the guardian of the interests of the residents and taxpayers of Hampshire.

Amalgamating the role of the county council's section 101 committee and the role of the LPB needs cannot comply with the Local Government Act 1972 and the Public Service Pensions Act 2013 at the same time. An amalgamated committee must simultaneously manage the finances of the administering authority and include non-elected members. We do not believe that is legally possible.

We believe it is in all parties interest that your authority withdraws its request to establish a joint committee and board.

I have copied in Bob Holloway as the responsible civil servant for the LGPS at the Department for Communities and Local Government.

I look forward to your reply.

Best wishes

Jon Richards