

## WILTSHIRE COUNCIL

WILTSHIRE LOCAL PENSION BOARD  
20 May 2021

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### PENSION FUND – LOW VOLUME PERFORMANCE MONITORING

#### Purpose of the Report

1. The purpose of this report is to update the Board on the Fund's performance measures for 2020/21 in connection with the following areas;
  - A) ICO Data Protection breach log;
  - B) tPR breach log;
  - C) Freedom of Information (FOI) log;
  - D) Complaints log;
  - E) Internal Dispute Resolution Procedures (IDRPs) log; &
  - F) Subject Access Request (SAR) log.

#### Background

2. As part of the Fund's good governance arrangements it maintains a range of performance measures which sit alongside the Fund's KPI's such as administration, data quality & benchmarking. However, whilst officers report on high volume KPI's such as administration at each quarterly meeting, it was felt that to provide meaningful analysis of low volume performance measures such as those identified above the statistics would only warrant being presented to the Board on completion of each scheme year.
3. The scope of the compliance requirements for the maintenance of the low volume performance measures is identified below;
  - a) The Data Protection Act 2018 in respect of Data Protection breaches & Subject Access Requests
  - b) The Pension Regulator's Code of Practice 14 in respect of tPR breaches, complaints & IDRPs
  - c) The Freedom of Information Act 2000

#### Considerations for the Board

4. The tables illustrated in Appendix I present a summary of each of the performance measures, which are supported by both an introduction to the measure and an officer comment highlighting any themes which can be observed from the measures recorded.

#### Conclusions

5. In addition to the individual commentary provided in respect of each low volume performance measure set out in appendix I officers have drawn the following general conclusions on these KPI's;
  - a) **General Activity** – Giving consideration to the circa 77,000 members being managed by the Fund at this time the volume of activity being experienced, as well as the general nature of that activity indicates that a low impact of performance errors and variances is currently affecting the Fund's day to day operating practices. The

breaches, requests and dissatisfaction being recording is consequently well within the tolerance level expected of a service provider of the Fund's scale.

- b) **New Fund Website** – It is the intention of the new fund website to improve the member experience. As indicated in Appendix I, not only will the Fund seek to publish more information concerning its approach to its future investment strategy, but we'll also aim to ensure members, employers and other stakeholders alike have convenient access to make Subject Access and Freedom of Information Requests, as well as submit compliments, complaints & IDPR requests.
- c) **Scams & claim activity** – With the growth in scams and claims company activity, officers are conscious of the need for the Fund to remain vigilant concerning the processing and peer review of information. The processes in place which enable this low volume performance monitoring report to be prepared will also be used to monitor scam and claim activity and allow the Fund to take evidence-based decisions to mitigate any inappropriate activity.

### **Environmental Impact**

- 6) There is no environmental impact from this report.

### **Financial Considerations**

- 7) There are no immediate financial considerations.

### **Risk Assessment**

- 8) There are no risks identified at this time.

### **Legal Implications**

- 9) There are no immediate legal implications arising from this report.

### **Safeguarding Considerations/Public Health Implications/Equalities Impact**

- 10) There are no implications at this time.

### **Proposals**

- 11) The Board is asked to note the findings of the low volume performance measures being monitored by officers on behalf of the Fund.
- 12) In view of the low level of activity recorded within this annual report the Board is asked to recommend that the content of the report is only submitted to the Committee on an exception basis, where it feels that a material operational need is present that would warrant the attention of the Committee.

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