Appendix 1:

Table 1 – TPR self-assessment March 2022 - Progress against outstanding internal review findings*:

No	Priority score	Issue	Recommendation	Management actions	Agreed management timescale	Est. Progress	Progress at 14 October 2022
1	Not stated	Review the of Fund's tPR breach policy	To update the Fund's tPR breach policy and processes in a manner agreeable to all stakeholders To ensure that the updated policy is consistent with the Regulator's new code of practice	1)　　To agree and establish an evidential basis for identifying "material significance". 2)　　To agree and establish the escalation steps on identification of a "materially significant" breach, which is agreeable to stakeholders and consistent with the spirit of the Regulator's code of practice 3)　　To approve an updated policy on issuance of the new code of practice	30 April 2023	**60%**	A draft breach policy has been prepared. However, Fund officers are waiting for final publication of new code of practice before it can be finalised. This is now expected in 2023, hence the agreed management timescale set. As part of this exercise, feedback is being sought on the definition of "material significance" in circa 25 different scenarios. Based on officer agreement of the interpretation of each definition, the existing escalation process will be enhanced and incorporated into the draft breach policy.
2	Not stated	Contract Management reviews	To address low regularity of contract management reviews of the Fund's service providers, both externally and internally	1)　　To prepare an action plan in which all manages undertake regular reviews of key service providers in their area to monitor that service providers performance, against the services they have agreed to provide. Plus, record and report that performance. 2)　　For assigned managers to actively contribute towards the preparation of service provider appointments and re-tenders	31 December 2022	**50%**	Contract Management meetings have been held by officers to agree the framework for the completion of regular contract management reviews. A first draft of a Fund procurement & contract management policy has been prepared, designed to integrate with the Council's procurement department processes. Feedback was received on the first draft on 12 October and a second draft is currently being prepared. A contract management schedule is also being updated. Managers have been allocated to lead on the monitoring of performance for each Fund service provider.
3	Not stated	Departmental System access control reporting	To evidence the review of staff access to Pension Fund systems and to clearly highlight the different	1)　　To assist the transparency of the Fund's security arrangements, reporting requirements	31 December 2022	**40%**	Whilst system access controls are in place within the department, an overarching policy and reporting framework is yet to be implemented, which will give

| | | | responsibilities the WC ICT Dept, Heywood's and the Dept. staff have, in connection with the completion of those responsibilities

In particular:

a) The activities set out in the "Personal Data Security" procedure, namely** | should be introduced into the Fund system access controls policy

2) To draft the reporting framework which will be reviewed | | | visibility to the co-ordination and monitoring of the tasks being completed and when.

The delay in progressing the drafting of this policy and reporting framework is primarily due to prioritisation and resource allocation within the department. However, this self-assessment seeks to enable the monitoring of this action's completion. |

*Findings are only those which were different to the SWAP Audit March 2022

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5.1 – Annual review of licences

5.4 – Business Continuity & Disaster Recovery Plan

5.6 – Staff Declaration of Interests form

5.9 – Database (Altair) access level rights for all WPF staff

5.10 – Access by staff to Altair outside of the Pension Dept.

5.12 – Record the authorisation levels for Fund staff (Financial)

5.16 – Where required, keyholders that maintain access to the cabinets & safes

5.30 – List of authorised WPF staff to transfer data to Hymans Robertson & Heywood's

5.7 – Maintenance of a central control schedule of all the above