

WILTSHIRE COUNCIL

WILTSHIRE LOCAL PENSION BOARD
22 May 2024

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 2023/24 in connection with the following areas:
 - A) ICO Data Protection breach log:
 - B) tPR breach log:
 - C) Freedom of Information (FOI) log:
 - D) Subject Access Request (SAR) log:
 - E) Informal Complaints log:
 - F) Formal Complaints log:
 - G) Internal Dispute Resolution Procedures (IDRPs) log: &
 - H) Pension Ombudsman 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 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 Complaint Activity** – The report added two new sections in 2023/24 to enable clearer review of the information provided. The two additions were Informal Complaints to assist Customer Service Excellence reporting and Pension Ombudsman cases.

Overall complaint activity increased significantly during the scheme year, however in consideration of the circa 85,000 membership of the Fund the volume of recorded complaints was still within the level expected for a Fund of this size and nature. In regard to the increased recording, the key causes were as a result of the introduction of informal complaint recording, which by its nature involved lowering the threshold for identifying potential complaints, as well as improved recording methods. In addition, the execution of key projects during the year, such as the payroll rectification exercise and the payroll migration to Oracle also significantly increased the volume of complaints made. Consequently, this volume of complaints did impact response times, with a greater number falling outside of their target deadlines, however it should be noted that other than communication and service delivery issues many of the complaints raised weren't upheld. The reason being that many responses actually involved advising the correction of historic inaccuracies and communicating those historic issues appropriately.

- b) **Other General Activity** – Regarding the report's other areas of disclose concerning data, breaches of law and freedom of information requests, all saw low or decreasing levels of activity. Notable amongst these activities was the circa 40% fall in Pension Regulator's breach recording, again due to improved reporting arrangements and active scheme employer management of contribution submissions. Whilst there are also notable areas of improvement such as responding to FOI requests within 20 days and the management of Swindon Borough Council contribution submissions, these disclosures are not seen as significant.
- c) **Reporting to Committee** – As before the Board agreed that it would only recommend that this report is submitted to the Committee if it felt that a material operational need is present that would warrant the attention of the Committee. It would then only submit that part of the report requiring the Committee's attention on that exception basis only.

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.

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