

## Appendix 1:

**Table 1 – Key Controls Report 30/04/2019 - Progress against internal audit recommendations:**

No	Priority score	Issue	Recommendation	Agreed management action	Agreed management timescale	Progress at 12 August 2020
1	2	There is a workload backlog within the team, and individual team members productivity is not being monitored.	We recommend that the Improvement Plan be put in place, as intended, to prioritise the workflow and reduce the backlog of work.	Officers will follow the details of the Data Improvement Sub Plan to aim to reduce down work in the identified areas of deferred benefit processing and aggregation to business as usual levels.	31 March 2020	<u>Behind target:</u> *Initiatives introduced: Auto-task allocation, revised starter process, revised leaver process (stage 1, stage 2 in progress), continuing rollout of i-Connect, realignment of aggregation workflows and *Staff are continuing to work overtime to help with resourcing. *Further staff resource and funding is being sought at the Committee meeting on 17 December 2020.
6	3	Reconciliations to ensure accurate data is held is not being completed on a frequent basis.	We recommend that a full reconciliation be undertaken between Altair and SAP Payroll. This recommendation is carried over from last year's audit report.	A full reconciliation between Altair and SAP Payroll will be completed.	1 December 2019	<u>Behind target:</u> Analysis of GMP and payroll reconciliation close to completion. Rectification due to be undertaken in 2021. We are now receiving monthly data cuts from Payroll. A paper detailing the current position of this whole Fund reconciliation is to be presented to the Pension Committee at their meeting on 17 December 2020.

**Table 2 – Pensions Fund Key Controls Review 06/10/2020 - Progress against internal audit recommendations:**

No	Priority score	Issue	Recommendation	Agreed management action	Agreed management timescale	Progress at 17 December 2020
1	2	Some weaknesses and inefficiencies identified in relation to the new procedure for the i-Connect system.	We recommend that senior officers liaise to ensure that a review of the member contribution issues raised in our finding is undertaken promptly, to future-proof the processes used and ensure appropriate efficiencies are made.	Senior Officers to find a satisfactory solution which enables the appropriate checks to take place in an efficient way.	January 2020	<u>On target:</u> Since early November i-Connect now has a reporting tool which will produce a report of all contributions (date specific) in an Excel file. This is now being used in preference to manually typing in contributions value from i-Connect into a master spreadsheet. The Fund's accounting team have rolled out a new approach to receiving remittance advice from employers which once fully embraced by employers will lead to easier cross-checks between contributions paid and contributions expected based on the membership data.

2	3	Checks of the "National Insurance" (NI) database are not consistently completed during the early stages of the sampled death grant payments.	We recommend officers ensure that the Altair workflow for processing death grants is updated to include the check of the NI database on notification of death at the beginning of the process. This is to ensure efficiency by the Fund acting accordingly where it is identified that the member has an alternative pension fund of higher value than that held with WPF.	Officers agree with the recommendation and will make this change.	30 November 2020	<b>Completed:</b> This has now been added to all relevant workflow tasks (i.e. sooner in the process that was previously being undertaken) and the written procedure has also been updated.
3	3	A Data Officer has not yet been set up to use the automated Docmail system.	We recommend that the Data Officer is set up with the access required to the Docmail system and is inducted on its use as required.	We agree with this action and will ensure that the data officer concerned, as well as other relevant new staff, are set up on Docmail. Part of the set-up process requires involvements from IT which may cause some delay.	31 October 2020	<b>Completed:</b> The officer is now successfully set up and printing from Docmail, in addition to receiving training on how to use the printing tool. It is a Pension Dept. requirement that all new starters have access to a Docmail account and receive the relevant training.
4	2	We identified several issues in relation to the guidance and training for, and the completion of, Data Protection Impact Assessments (DPIA).	We recommend that officers: Complete a review of the Docmail system's DPIA to ensure that all risks relating to the processing of personal data have been captured and appropriately mitigated to the satisfaction of the Fund. Ensure that all staff and managers with specific responsibilities for the completion of DPIAs receive any further training required to complete the procedure effectively.	We agree with this recommendation and we will action accordingly.	17 December 2020	<b>On target: 1.</b> The Docmail system's project plan & DPIA has been reviewed by the Fund's Project Manager & both documents are being updated to demonstrate that control of this exercise has been maintained. <b>Completed: 2.</b> After discussion with relevant staff and managers with specific responsibilities for the completion of DPIAs determined that additional training was not required. The outcome of the discussion discovered that knowledge & understanding were not the source of the issue, but the pressure of overall work commitments was, which had led to a shortfall in the completion of good administrative housekeeping within the department.

5	3	We identified several issues in relation to the guidance and training for, and the completion of, Data Protection Impact Assessments (DPIA).	<p>We recommend that the Governance and Performance Manager:</p> <p>1.Reviews the current DPIA procedure and standard DPIA template to ensure they consistently reflect the procedures, are clear and easy to follow, and to provide risk scoring methodology and assessment guidance.</p> <p>2.The above documents should then be re-communicated to relevant staff and managers and their feedback invited to ensure they have a good understanding of the procedures to be used.</p>	We agree with this recommendation and we will action accordingly	17 December 2020	<p><b>On target:</b> 1. It is noted that pages 7 &amp; 8 of the Fund's Privacy Impact Assessment should be completed by Information Governance (IG) and signed off on page 10 by IG. However, as IG have no form of their own, or completed the Fund's form, Fund Officers propose to change the Fund's DPIA form in order to manage the outcome &amp; just request IG provide an indication of approval for our DPIA. Namely an email response. Consequently, our policy &amp; procedure can then remain unchanged.</p> <p><b>Completed:</b> 2. The Fund's Project Manager consulted on the use of current DPIA procedure and standard DPIA template, the outcome of which is specified in 1 above.</p>
6	3	The Fund has not received formal acceptance from one of their Investment Managers of their wish to be treated as a 'Professional Investor' in relation to the MiFID II.	We recommend that officers seek a formal, written acceptance of the Fund's re-categorisation as Professional Investors and how they will be treated in respect of this status, from any Investment Managers who have not yet returned a formal acceptance.	We agree with this recommendation and we will action accordingly	tbc	<p><b>Completed:</b> Officers have written to the outstanding investment manager concern the Fund's wish to be treated as a 'Professional Investor' in relation to the MiFID II and a positive response has been received.</p>