

AGENDA

Meeting: Wiltshire Pension Fund Committee
Place: Kennet Room - County Hall, Bythesea Road, Trowbridge,
BA14 8JN
Date: Thursday 12 December 2024
Time: 10.00 am

Please direct any enquiries on this Agenda to Ben Fielding - Senior Democratic Services Officer of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line: 01225 718656 or email: Benjamin.fielding@wiltshie.gov.uk

Press enquiries to Communications on direct lines (01225) 713114/713115.

This Agenda and all the documents referred to within it are available on the Council's website at www.wiltshire.gov.uk

Membership:

Voting Membership

Wiltshire Council Members:
Cllr Richard Britton (Chairman)
Cllr Gordon King
Cllr Stuart Wheeler
Cllr Gavin Grant
Cllr Robert Yuill

Swindon Borough Council Members

Cllr Kevin Small
Cllr Vijay Manro

Employer Body Representatives

Jodie Smart
Claire Anthony

Substitute Members

Cllr Sarah Gibson MP
Cllr Carole King
Cllr Christopher Newbury
Cllr Ian Thorn

Non-voting Membership

Observers
Stuart Dark
Mike Pankiewicz

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Public Participation

Please see the agenda list on following pages for details of deadlines for submission of questions and statements for this meeting.

For extended details on meeting procedure, submission and scope of questions and other matters, please consult [Part 4 of the council's constitution](#).

The full constitution can be found at [this link](#).

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For assistance on these and other matters please contact the officer named above for details

Items to be considered

Time

PART I

Items to be considered when the meeting is open to the public

- 1 **Membership and Apologies** 10.00am

To receive any apologies for absence or substitutions for the meeting.

- 2 **Minutes** (Pages 7 - 12)

To approve and sign as a true and correct record the Part I (public) minutes of the previous meeting held on 21 November 2024.

- 3 **Declarations of Interest**

To receive any declarations of disclosable interests or dispensations granted by the Standards Committee.

- 4 **Chairman's Announcements**

To receive any announcements through the Chairman.

- 5 **Review of Actions Log** (Pages 13 - 14)

To review progress on any actions requested by the Committee in previous meetings.

- 6 **Review of the Minutes of the Local Pension Board** (Pages 15 - 24)

To receive the minutes of the meeting of the Local Pension Board held on 7 November 2024. To review the summary of the recommendations made by the Board.

- 7 **Public Participation**

The Council welcomes contributions from members of the public.

Statements

If you would like to make a statement at this meeting on any item on this agenda, please register to do so at least 10 minutes prior to the meeting. Up to 3 speakers are permitted to speak for up to 3 minutes each on any agenda item. Please contact the officer named on the front of the agenda for any further clarification.

Questions

To receive any questions from members of the public or members of the Council received in accordance with the constitution.

Those wishing to ask questions are required to give notice of any

such questions in writing to the officer named on the front of this agenda no later than 5pm on **Thursday 5 December** in order to be guaranteed of a written response. In order to receive a verbal response, questions must be submitted no later than 5pm on **Monday 9 December**. Please contact the officer named on the front of this agenda for further advice. Questions may be asked without notice if the Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Committee members prior to the meeting and made available at the meeting and on the Council's website.

8 **Headlines and Monitoring (HAM)** *(Pages 25 - 70)*

A report for the committee's ongoing oversight of:

- Scheme, Regulatory, Legal and Fund Update
- Administration KPI update – 1 October 2024 to 30 November 2024
 - a) McCloud and Pension Dashboard updates
 - b) Pension Review update
- Risk Register
- Audit update
 - a) SWAP KC actions
 - b) Audit strategy 2025/26

9 **TPR General Code of Practice plan and self-assessment** **10.20am**
(Pages 71 - 74)

An update by the Fund Governance Manager on the progress for implementing changes to the Fund's internal controls as a result of the new general code of practice.

10 **Review of Cyber, Data Security & Business Recovery** **10.30am**
(Pages 75 - 116)

The Fund Operations Manager will present the Fund's cyber security policy for consideration by the Board and recommendation to the Committee. The presentation will also include a summary on the Fund's Business Continuity Plan.

11 **Risk Management framework update** **10.40am**
(Pages 117 - 126)

An update by the Head of Wiltshire Pension Fund concerning the progress of the Fund's new Risk Management a framework.

12 **Key Financial Controls** **10.50am**
(Pages 127 - 132)

An update by the Investment and Accounting Team Lead concerning the operational accounting arrangements.

13 **Payroll migration update** **11.00am**

The Fund Operations Manager will provide report concerning the completion of the payroll migration.

Please note this report will follow as a supplement.

14 **Committee Forward Work Plan** (Pages 133 - 136) **11.10am**

To review the work plan for the committee.

15 **Date of Next Meeting**

To determine the date of the next Committee meeting dates:

- Investment focused meeting 27 February 2025
- Administration focused meeting 20 March 2025

16 **Urgent Items**

Any other items of business which, in the opinion of the Chairman, should be considered as a matter of urgency. Urgent items of a confidential nature may be considered under Part II of this agenda.

17 **Exclusion of the Public** **11.15am**

To consider passing the following resolution:

To agree that in accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting for the business specified in Item Numbers 18 – 21 because it is likely that if members of the public were present there would be disclosure to them of exempt information as defined in paragraphs 1 & 3 of Part I of Schedule 12A to the Act and the public interest in withholding the information outweighs the public interest in disclosing the information to the public.

PART II

Item(s) during consideration of which it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed

18 **Minutes** (Pages 137 - 144) **11.20am**

To approve and sign as a true and correct record the Part II (private) minutes of the previous meeting held on 21 November 2024.

19 **Review of the Minutes of the Local Pension Board (Part II)**
(Pages 145 - 152)

To consider the Part II (private) minutes, and recommendations arising, from the last meeting of the Local Pension Board held on 7 November 2024.

20 **KPI Improvement Plan** **11.30am**

An update by the Administration Team Lead concerning progress against the KPI Improvement Plan.

Please note this report will follow as a supplement.

21 **Pension Review and Consultation** *(Pages 153 - 166)* **11.40am**

An update by the Head of Wiltshire Pension Fund concerning anticipated changes to the LPGS.

Wiltshire Pension Fund Committee

MINUTES OF THE WILTSHIRE PENSION FUND COMMITTEE MEETING HELD ON 21 NOVEMBER 2024 AT KENNET ROOM - COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

Present:

Cllr Richard Britton (Chairman), Cllr Kevin Small (Vice-Chairman), Cllr Gordon King, Cllr Vijay Manro, Cllr Stuart Wheeler, Cllr Gavin Grant, Cllr Robert Yuill, Mike Pankiewicz and Anthony Fletcher.

122 **Apologies**

Apologies for absence were received from Jodie Smart, Karl Read and Claire Anthony.

123 **Minutes**

The minutes of the meeting held on 10 October 2024 were presented for consideration.

After which, it was,

Resolved:

To approve and sign the minutes as a true and correct record.

124 **Declarations of Interest**

There were no declarations of disclosable interests.

125 **Chairman's Announcements**

The Chairman and Chris Moore, Investment and Accounting Team Lead provided an announcement that the Government had announced a further consultation into the future of the LGPS and Pooling and that whilst the consultation was talking about Funds it was only referring to the investments. The Fund was working on suitable comms for stakeholders and that most things would continue as before in terms of operations outside of the investments area.

Detail was provided that there were key three areas to the proposals:

- Reforming the LGPS Pools.
 - o Defining how they should operate, by being FCA regulated.
 - o Administering authorities to fully delegate implementation of investment strategy to the pools.

- AA to take their principal investment advice from the pool.
- Transfer all legacy assets to the pool management by March 2026.
- More in house skills.
- Boosting LGPS investment into their localities and regions of the UK
 - Working with local authorities and mayoral authorities on their priorities, then feeding this to the pool to assess and implement.
- Strengthening governance for the AA and pools
 - Skills and training for committee and board, independent advisor on committees.
 - Pool boards to have reps.

It was outlined that given the significant proposed changes and ranging impacts on the Fund's investments, it was decided that a specific session would be run on this at the next Committee meeting in December, to provide more detail, and to also provide officers more time to gather information to inform the session. This session would be in place of the planned training session on local and social investment, which was now deferred until the February meeting.

126 **Review of Actions arising from previous meeting(s)**

The Committee reviewed the Actions Log.

127 **Public Participation**

No statements or questions were submitted.

128 **Responsible Investment Update**

Chris Moore, Investment and Accounting Team Lead, presented a report on the Fund's quarterly responsible investment performance. The report included, but was not limited to that there had been some significant progress against priorities. The highlights included that progress had been made with the final nature-based allocation in the CLOPs portfolio. Additionally, Redington had also provided a paper on this area with the outcomes to be reported back to the Committee, with the Fund believing that it was important to continue with the manager selection in order to meet performance against its strategic asset allocation.

It was noted that the Employer Survey had recently closed and that the results were now being analysed. An Employer Forum was also set to take place on Thursday 28 November, with 50 attendees set to be present comprising of 31 individual employers.

It was outlined that a first draft of the Investment Report had now been completed and had been sent for design and that the report would include case studies and site visits, with it noted that c30% of the Fund's investments were within the UK.

Additionally, a full Q2 voting summary had also been attached to the agenda including highlights for responsible investments.

The Committee discussed the report with feedback provided that the report and the progress made was good. A point was raised regarding the attendees of the Employer Forum and the strength of the relationship of those attending and how might these be categorised across a spectrum of strong and weak relationships.

At the conclusion of debate, it was,

Resolved:

The Committee agreed to use this report as a basis for monitoring the progress that is being made towards implementing responsible investment policy.

129 **MiFID II Compliance and Declaration**

Chris Moore, Investment and Accounting Team Lead, presented an update requesting completion by members of their self-certification of MiFID II. The update included but was not limited to that MiFID II related to the professional investor status held by the Fund, with it noted that the Fund decided to opt for the status during the Committee meeting that took place on 13 September 2017. It was outlined that the committee completes this annual self-certification process as part of its assessment of maintaining professional client status.

It was outlined that previously the assessment had been made by asking each voting member of the committee to sign a self-certification form. This year it was proposed that the Fund made a collective assessment of its competence, or if preferred members can complete the individual signed declarations.

The Committee discussed the update with it suggested that within the Committee there was the ability to collectively ask the right questions and make informed decisions using advice given by the professional advisors supporting the Committee. A further point was raised in regard to the Government consultation paper that though the Fund had professional advisors available, it was questioned whether Committee members had sufficient knowledge to make challenges to those advisors and that the Committee and Pension Board would have to be at the same level.

A point was raised about the recent churn rate of the Committee with Membership often changing and that in the past there had been greater consistency, possibly suggesting that the knowledge base of the Committee had declined.

It was suggested that a recorded vote be taken should the Committee agree to collectively confirm their competence as apologies had been received from the voting Employer Body representatives on the Committee. Therefore, enabling the Committee to have an audit trail of the Membership who would need to complete declaration at a later date.

Lizzie Watkin, Treasurer of the Wiltshire Pension Fund stressed the importance of being evidence based with decisions and that there would be a need to identify risks and gaps in knowledge to ensure that training provided was targeted. This would therefore enable the Committee to fulfil its responsibilities in a robust manner with confidence.

A further point was raised regarding the local election in May and how this could potentially cause a further churn to the Committee Membership and that training would be important as well as ensuring that if a new Membership was to be assembled that they had a chance to get to know each other.

At the conclusion of debate, it was,

Resolved:

The Committee agreed:

For the Committee to confirm that collectively they have the requisite skills, experience and support to remain a professional investor.

For individual Committee Members to be aware and conscious of particular training that they might require and take responsibility to raise this with the Chairman or officers in order to receive training.

A recorded vote took place with all Members present voting unanimously on the resolution: Cllr Gavin Grant, Cllr Richard Britton, Cllr Kevin Small, Cllr Stuart Wheeler, Cllr Vijay Manro, Cllr Gordon King and Cllr Robert Yuill.

130 **Date of Next Meeting**

The following dates of the next meetings were confirmed:

- Administration focused meeting 12 December 2024
- Investment focused meeting 27 February 2025

131 **Urgent Items**

It was noted that the meeting set to take place on 27 February 2025 would clash with the Swindon Borough Council Annual Budget meeting. Therefore, this meeting date would be attempted to be changed.

132 **Exclusion of the Public**

It was,

Resolved:

To agree that in accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting for the business specified in Minute Numbers 12 - 15 because it is likely that if members of the public were present there would be disclosure to them of exempt information as defined in paragraphs 1 & 3 of Part I of Schedule 12A to the Act and the public interest in withholding the information outweighs the public interest in disclosing the information to the public.

133 **Minutes**

The private minutes of the meeting held on 10 October 2024 were presented for consideration, and it was,

Resolved:

To approve and sign the minutes as a true and correct record.

134 **Redington Investment Advisor Training**

The Wiltshire Pension Fund Committee received training on the new pension health check dashboard conducted by representatives from Redington.

135 **Quarterly Investment Update**

Chris Moore, Pension Administration Lead, presented a report on the Fund quarterly investment performance.

At the conclusion of debate, it was,

Resolved:

The Committee agreed to:

a) Use the investment reports and the update provided by officers and advisers at the meeting as a basis for monitoring the investment performance and implementation of the strategic asset allocation.

b) Approve that officers, working with the fund's investment advisor, design and implement a suitable approach to increasing the commitment to the existing affordable housing investment manager/s, to meet the 5% strategic asset allocation. Officers will report back to committee on how the increased allocation was fulfilled.

136 **Brunel Governance Update**

Chris Moore, Pension Administration Lead, provided a verbal update summarising the ongoing Brunel governance arrangements.

(Duration of meeting: 10.00 am - 12.00 pm)

The Officer who has produced these minutes is Ben Fielding - Senior Democratic Services Officer of Democratic Services, direct line: 01225 718656, e-mail: Benjamin.fielding@wiltshire.gov.uk

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Agenda Item 5

Wiltshire Pension Fund Committee - Actions Log					
Minute reference	Section	Meeting Action	Task owner	Target date for completion	Date completed
33 (28/03/24)	Scheme Employers (Covenant Risk)	For Officers to provide Councillors with a simplified Covenant Risk document of answers to questions they may experience at Town & Parish Council meetings	MA	10/10/24	10/10/24
66 (11/07/24)	Administration (Charging)	Officer to produce an administration charging paper for consideration by members.	JF	10/10/24	10/10/24
67 (11/07/24)	Governance (Risk Management)	To develop a plan to align & embed the Fund's current operational risk register with Wiltshire Council's over the next 12 months, taking account of internal audit recommendations and to advise members of its implementation	RB	11/07/25	
96 (19/09/24)	Investment (Local Investment)	To receive confirmation that all instructions in relation to the Pension Review submission and cover letter have been sent to other local authority members and the Brunel Pension Partnership	JD	21/11/24	21/11/24
97 (19/09/24)	Investment (Local Investment)	To consider approving the direction of travel around investing locally to a late meeting.	CM	27/02/25	
97 (19/09/24)	Investment (Training)	To receive a training session on the topic of social/local investment	CM	27/02/25	
107 (10/10/24)	Actuarial (Training)	Members to consider areas for training regarding the valuation process in consultation with Officers before confirming to Barnett Waddingham	JD	20/03/25	
121 (10/10/24)	Administration (Overpayment recovery)	The Committee agreed that a decision would be made on the next steps the Fund should take if outstanding monies are not received following a third chase attempt	JF	12/12/24	Agenda item
129 (21/11/24)	Investment (MiFID II Compliance)	Establish an evidence based skill gaps for members in relation to MiFID II	RB	20/11/25	
135 (21/11/24)	Investment (Affordable Housing)	To design and implement an approach to increasing the commitment to the existing affordable housing investment manager/s, to meet the 5% strategic asset allocation and report back to committee on how the increased allocation was fulfilled.	CM	27/02/25	

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Local Pension Board

MINUTES OF THE LOCAL PENSION BOARD MEETING HELD ON 7 NOVEMBER 2024 AT KENNET ROOM - COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

Present:

Mark Spilsbury (Chairman), Laura Fisher, Mike Pankiewicz and George Simmonds (Vice-Chairman)

Also Present:

Cllr Richard Britton and Cllr Robert Yuill

74 **Membership**

The Chairman reminded the Board that he would be stepping down as Chairman and Board Member as of 31 March 2025 and that his last meeting would be on 11 February 2025.

The Head of Wiltshire Pension Fund outlined the plans and timetable in place for a replacement Board Member, and it was anticipated that an appointment would be made by January 2025, with a formal handover being made at the Wiltshire Pension Fund Committee on 27 February 2025.

75 **Attendance of non-members of the Board**

The following Councillors attended the meeting:

- Cllr Richard Britton in his capacity as Chairman of Wiltshire Pension Committee.
- Cllr Robert Yuill in his capacity as a member of the Wiltshire Pension Committee.

76 **Apologies**

Apologies were received from Marlene Corbey and Karl Read.

77 **Minutes**

The Part I (public) minutes of the previous meeting held on 23 September 2024 were considered.

In addition, the Board noted it's latest Action Log.

Resolved:

The Board approved and signed the Part I (public) minutes of the previous meeting held on 23 September 2024 as a true and correct record, and the Board's action log was noted.

78 **Declarations of Interest**

There were no declarations of interest.

79 **Chairman's Announcements**

There were no Chairmans announcements.

80 **Public Participation**

There were no public statements or questions submitted.

81 **Minutes and Key Decisions of the Wiltshire Pension Fund Committee**

The Part I (public) minutes from the last ordinary meetings of the Wiltshire Pension Fund Committee meetings held on 19 September 2024 and 10 October 2024 were considered.

Resolved:

The Board noted the Part I (public) minutes from the ordinary meetings of the Wiltshire Pension Fund Committee held on 19 September 2024 and 10 October 2024.

82 **Headlines & Monitoring (HAM) Report**

The Board considered the report of Jennifer Devine - Head of Wiltshire Pension Fund which provided information highlighting key issues and developments to enable the Board to fulfil its monitoring role.

The report detailed updates in the following areas:

- Headlines
- Scheme, Regulatory, Legal and Fund Update
- Health Check Dashboard
- Risk Register
- Administration KPIs, including a strategic projects update
- Audit Update – KC actions update

Officers provided comment and responses to Board questions as follows:

- The topics covered during the Pension Awareness week held between 9-13 September 2024 were highlighted and good attendance and feedback was reported.

- Sample checking during quarter 3 had reduced to 83% and this was due mainly to grammatical oversights and there was a need to improve the quality of work undertaken to achieve a higher standard.
- It was confirmed that there were no concerns regarding the investment performance dipping into the amber rating for quarter 3, as the threshold for a green rating is 4.1% p.a. over 5 years and this quarter was 4.0% p.a. over 5 years.
- Confirmation of the funding level measures and methodologies employed by the previous and current actuaries was commented upon, with the funding level measure still unavailable due to the transition between actuaries. The new actuaries indicating that the level has remained stable since the 2022 evaluation, and officer anticipating that the rating will be green once the official information is received.
- The Board noted that the Pension Administration Standards Association (PASA) accreditation status was being sought and this was the 'Gold Standard' for local government pension funds.
- Budget monitoring and forecasting for the cost per member has been disrupted due to the new finance system in place, making accurate data unavailable at the present time.
- Staff engagement indicators were all moving towards a green rating due to improvements across the board.
- The rating of Member Services at 104% was due to the speed that an action had taken to complete.
- The changes in the risk register between July and September related to Fund Governance and Projects.
- The main recommendation from SWAP related to the integration with the Council's risk management framework. The Fund risk register has started to be updated following the recent workshop with the Council's Corporate Support team, with a target date to complete the update by the end of November 2024.
- The majority of the Administration KPI's would have a green rating for the December reporting period, with the top three priorities being deaths, retirements and refunds.
- Both Wiltshire and Swindon employers have onboarded to I-Connect

Resolved:

- a) to note the Fund updates.
- b) to endorse the risk, register in Appendix 3 & the summary of risk changes since the last review, as a true and fair view.
- c) to note the progress against the SWAP KC audit recommendations.

83 **KPI Improvement Plan**

The Board considered the update report of James Franklin, Administration Team Lead which highlighted progress against the KPI Improvement Plan.

The Board noted that reporting includes every case, and the Administration Team are on course to have less than 100 cases open at 31 December 2024, down from 3,000 currently. The Team is currently running with 3 vacancies.

Resolved:

That the KPI Improvement Plan be noted.

84 **Key Financial Controls**

The Board considered the report of Christopher Moore – Pension Fund Accounting and Investment Team Lead, which highlighted the significant issues in relation to the Fund's key financial controls.

The Team Lead reported that final sign off of the Full Wiltshire Council Accounts for 2019/20 had progressed, although a few additional issues were raised by Deloitte which officers are responding to. The sign off on the Pension Fund Accounts for 2020/21, 2021/22, 2022/23 continued to be delayed due to an issue within the Wiltshire Council figures, meaning the pension fund accounts have not received their final audit opinion.

Resolved:

The Board agreed to use the report to monitor progress against resolving the issues which have been identified.

85 **Pension Administration Strategy**

Resolved:

To defer consideration of the item until the next meeting of the Board on 11 February 2025.

86 **Integrated payroll system update**

The Board received a verbal update from James Franklin, Pension Administration Lead about transfer of the Fund's from Oracle to Altair.

The Team Lead was pleased to report that a successful migration took place on 25 October 2024, and all issues have been fixed, the project just needs to be closed off. A successful connection to HMRC has recently taken place and the first large PAYE payment is being made very shortly.

The Team Lead confirmed that staff involved in the integrated payroll system will now devote their time to their other day to day administrative duties and other tasks.

Resolved:

That the Pension Administrative Lead update about the transfer from Oracle to Altair be noted.

87 **Integrated immediate payments update**

The Board considered the report of James Franklin, Pension Administration Lead which provided an update on the impact to the Fund of immediate payments and payroll to scheme members following the Council's migration of service from SAP to Oracle.

The Pension Administration Lead informed that Board that since the last update in September 2024 where £17,896.10 was still outstanding, the current amount outstanding is £7,509.05. The Board noted that the Council's debt recovery process is currently being following to recover the outstanding amounts, and the action to be taken if outstanding amounts are not recovered, which includes legal action and raising the matter with the Council's Legal Services.

Resolved:

To note the Boards agreed actions the Fund should take if outstanding monies are not received.

88 **Cyber Security and Business Continuity update**

The Board considered the report of Mark Briggs, the Fund Operations Manager about the Fund's cyber security policy (appendix 2) and in addition, received a presentation about the Fund's Business Continuity Plan (appendix 1).

The Board noted that cyber risk is recognised as a real and growing threat and the aim of the Cyber Security Policy is to set out how the Fund intends to assess and manage cyber risk. The report detailed the Funds approach to cyber governance and indicated that the Fund would assess all advisers, providers and partner organisations identified by its Cyber Security Data Map to ensure they have appropriate arrangements in place to protect themselves against cyber threats.

The Board noted that when the contract is renewed with external providers, they would have their cyber security reviewed annually by the Pension Fund. The Operations Manager explained that he was sufficiently confident in this area and that staff would receive appropriate training.

Resolved:

That the Board recommends the Cyber Security Policy to the Wiltshire Pension Fund Committee.

89 **General Code of Practice Plan**

The Board considered the report of Mark Briggs, Fund Operations Manager on the progress being made to implement changes to the Fund's internal controls as a result of the new General Code of Practice.

The Operations Manager explained that the new Code consolidates 10 of the existing Codes into one Code and addresses the governance requirements arising from the UK's implementation of IORP II which expects trustees to have an 'effective system of governance' and the schemes to complete an 'own risk assessment'.

The Action Plan listed Training, Gap Analysis and Review or establish new policies as items requiring additional work.

The Board noted that work on the Plan and compliance needed to be completed by the end of April 2025. The filling of the Quality Assurance vacancy would help with the completion of the Plan; however, other officers would be tasked with responsibility to complete the Plan in the event that the vacancy was unfilled during this time.

Resolved:

To note the progress of implementing changes to the Fund's internal controls as a result of the new General Code of Practice.

90 **Employer Update**

The Board considered the report of Matt Allen, Employer Funding and Risk Lead which provided an update about employer related activities undertaken by the Fund.

The report provided detail in relation to employer scorecards, employer covenant exercise, Employer Forum, employer activity and triennial valuation. It was noted that all employers identified as high risk have been informed that they may incur higher employer contributions.

Resolved:

That the report be noted.

91 **Urgent Items**

There were no urgent items.

92 **Date of Next Meeting and Forward Work Plan**

The next ordinary meeting of the Board will be held on 11 February 2025.

The Board also considered the Scheme Year Forward Work Plan for the new scheme year and approved its content.

Resolved:

The Board noted the date of the next meeting and approved the Scheme Year Forward Plan.

93 **Exclusion of the Public**

The Board considered the recommendation to exclude the public.

Resolved:

To agree that in accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting for the business specified in Item Numbers 21-24 because it is likely that if members of the public were present there would be disclosure to them of exempt information as defined in paragraph 3 of Part I of Schedule 12A to the Act and the public interest in withholding the information outweighs the public interest in disclosing the information to the public.

94 **Minutes and Key Decisions of the Wiltshire Pension Fund Committee**

The Part II (private) minutes from the ordinary meetings of the Wiltshire Pension Fund Committee held on 19 September 2024 and 10 October 2024 were considered.

Resolved:

The Board noted the Part II (private) minutes from the ordinary meetings of the Wiltshire Pension Fund Committee held on 19 September 2024 and 10 October 2024.

95 **Brunel Governance Update**

Jennifer Devine, Head of Wiltshire Fund provided a verbal update summarising the ongoing Brunel governance arrangements.

Resolved:

That the verbal update from the Head of Wiltshire Fund be noted.

96 **LPB Minutes**

The Part II (private) minutes of the previous meeting held on 23 September 2024 were considered.

Resolved:

The Board approved and signed the Part II (private) minutes of the previous meeting held on 23 September 2024 as a true and correct record.

97 **Urgent Items**

There were no urgent items.

(Duration of meeting: 10.00 - 11.55 am)

The Officer who has produced these minutes is Stuart Figini of Democratic Services, direct line 01225 718221, e-mail stuart.figini@wiltshire.gov.uk

Press enquiries to Communications, direct line 01225 713114 or email communications@wiltshire.gov.uk

Wiltshire Council

Wiltshire Pension Fund Committee

12 December 2024

Recommendations of the Local Pension Board 07 November 2024

Minute at Board	Recommendation	Committee Agenda
Minute 82 – Risk Register Update	To endorse the Risk Register and summary of risk changes since the last review and to recommend the Committee they accept the proposed changes as set out in the HAM Report.	Item 08 – Headlines and Monitoring – Risk Register
Minute 88 – Cyber Security and BCP update	To recommend the Cyber Security Policy to the Pensions Committee.	Item 11 – Cyber, Data Security and Business Recovery

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WILTSHIRE COUNCIL

WILTSHIRE PENSION FUND COMMITTEE
12 December 2024

WILTSHIRE PENSION FUND HEADLINES AND MONITORING REPORT

Purpose of the Report

1. The purpose of this report is to provide the Committee with information in relation to various standard issues, to enable the Committee to fulfil its monitoring role.
 - a) Headlines
 - b) Scheme, Regulatory, Legal and Fund Update
 - c) Administration KPI update – 1 October 2024 to 30 November 2024
 - 1) McCloud and Pension Dashboard updates
 - 2) Pension Review update
 - d) Risk Register
 - e) Audit update
 - 1) SWAP Audit KC action log 2024/25
 - 2) Audit strategy 2025/26
2. This report is intended to highlight key issues and developments. Full detail is provided in the Appendices.

Report from Head of Wiltshire Pension Fund

3. This section summarises key events across the Pension Fund over the last quarter.
 - a) Investment performance for the quarter to Sep-24 was +1.9%, outperforming the combined benchmark for all portfolios of +1.3%. The fund value at the end of Sep-24 was £3.4bn.
 - b) The migration of the pensioner payroll from Oracle to Altair has now successfully completed.
 - c) Following a thorough revision of checks and controls and the roll out of extensive training for fund employers, several employers are currently being onboarded to iConnect.
 - d) The Annual Report and Accounts have been completed for 2023/24, although audit work is still ongoing. The Annual Report has been published online pending audit sign off.
 - e) The Government has launched the consultation “LGPS – Fit for the Future”, which details proposals for significant change to the LGPS. This important item is covered elsewhere on this agenda. The deadline to respond to the consultation is 16 January 2025.
 - f) Progress against the KPI Improvement Plan is behind schedule, and the team will not be able to deliver against the Plan’s next milestone at 31 December 2024. A paper setting out a proposed amended approach is elsewhere on this agenda.
 - g) The Fund’s report on Investing in the UK is due to be published in the next couple of weeks, showcasing several different UK investments that have been made and supporting the fact that the LGPS is already delivering at a high level in this area.
 - h) The salary benchmarking review has now been enacted, and this has led to being able to recruit two new officers in the member services team, starting soon. We are currently recruiting for some other roles. There is also significant other engagement and cultural work going on with the team, including the annual employee engagement survey. A verbal update can be provided if members would like more information.

- i) The Fund has won a couple of awards recently. Firstly the Fund’s Communications and Stakeholder Engagement Lead, Krystie Waterhouse, won the award for Excellence in Customer Service and Communications at the Professional Pensions Rising Star Awards 2024. And the Fund won the award for Investment Innovation at the LGC Investment Awards, in recognition of the Climate Opportunities portfolio. Congratulations to the team!

Scheme, Regulatory and Legal Update (Appendix 1)

- 4. A scheme update is included in paragraph 3 of this report. Regulatory legal updates have been provided via Barnett Waddingham October 2024 LGPS Pulse circular (Appendix 1). Key additional strategic Fund updates have been incorporated within the Fund’s risk register section of this report.

Health Check Dashboard (Appendix 2)

- 5. The Health Check Dashboard provides a snapshot of the Fund’s performance against its Business Plan objectives, and these are shown under the Fund’s seven pillars of customer service. Service Delivery KPIs, Investment performance, Funding level, Customer Service Excellence, Internal audit ratings, Cost per member and Staff engagement. This update provides commentary on trends from June to September.

Risk Register (Appendix 3a & b)

- 6. The version of the risk register presented in Appendix 3b relates to the month of September 2024. However, at the Committee’s request officers have also included the latest available version (the October version) in support of the September version reviewed by the Board at their last meeting.
- 7. For members to be able to monitor the key changes between versions submitted to meetings officers have provided a summary table below. Please note that this summary provides changes reviewed by the Board at their November meeting and the summary of changes covers the period July to September. The purpose of this summary of changes is intended to assist Committee members by focusing on all the key recommended changes endorsed by the Board during the period.
- 8. The summary of key changes between the July and September versions of the risk register are:

Risk Section	Section rating change	Key notes and mitigations during the period
Fund Governance	Green to Amber	<ul style="list-style-type: none"> a) The Pension Regulator has indicated that the pace of change to comply with the new general code of practice should quicken. Fund changes have been identified, however implementation via the constitution has been delayed due to member concerns. b) Member engagement with the approved training plan is also inconsistent.
Projects	Green to Amber	<ul style="list-style-type: none"> a) Procurement of an interface to assist with the implementation of the Pension Dashboard project has been slower than expected. The target deadline is December 2024. b) The Fund’s external providers have announced that they will not support MSS after October 2025. A project plan

		is to be created to migrate the Fund's services to the new platform
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9. Officers can advise that they held a workshop with the Council's Corporate Support team on 14 October. The workshop was intended to cover the wording of risks, the scoring of risks and risk appetite. Following this meeting the Fund officers started to update their risk register design prior to wider presentation to the rest of the management team. Further meetings were held on 18 and 25 November with a view to this exercise being completed by the end of November.

Administration KPIs (Appendix 4)

10. Tables 1 & 2 show the admin performance over the period from 1 August 2024 to 31 October 2024. November statistics were not available at the time of drafting. The Admin KPI picture has improved since the last update but not at the pace needed. The backlog has decreased by 326 cases since our last report, however the mid-month reports currently available show these gains have been wiped out since the payroll migration. Based on the current work position we will not be able to meet the target set for the 31 December 2024 checkpoint. A full update will be provided later in the meeting.
11. Table 3 provide some analysis of the open cases. Table 3 shows the number of cases older than 2 and 3 years have decreased slightly). The graph under the table shows the difference between completed and received cases which shows the team not keeping up with the incoming post. The second graph shows the continued trend of cases over SLA decreasing over the period with a slight increase in August.
12. We have now included a section detailing the current position onboarding employers onto iConnect. As you can see, we now have 138 employers onboarded and 41 manually submit data and we expect this project to be completed by 31 March 2024. The team will then focus on employer training to ensure submissions are made on time.

Audit update (SWAP KC audit) (Appendix 5)

13. Since the Committee meeting in October a summary of the following progress against that action plan has recorded below:
- The Complaints Monitoring & Reporting & the KPIs, Reports & Monitoring of Staff Productivity actions are considered complete by officers. Evidence of completion will be provided to SWAP.
 - **Risk Register** – Elements of the Fund's current risk management system require improvement, including integration with the Council's risk management framework and that some gaps identified need to be corrected:
Progress: Considerable progress has been made in relation to this action, which is recorded at 85% complete. A paper at agenda item 12 of this meeting updates the progress and requests officer recommendations for member approval. Subject to approval officers request a 3-month extension to complete the work.
 - **Quality Assurance** – To address weaknesses in the existing QA process, such as sample checking and trend analysis:
Progress: Officers has drafted a presentation and QA log. A policy will be drafted on appointment of a QA Lead. This action is considered 70% complete and the delay in its progress is subject only to the appointment of a suitable QA Lead. Officers request a 3-month extension to complete the work.
 - **i-Connect", the Employer Scorecard and Administrative Charging** – To complete the implementation arrangements for these employer related activities:

Progress: The administration charging strategy has been approved and i-Connect has on-boarded all but 14 employers, down from 35, including the large employers such as SBC. On-boarding of employers is now nearing a business-as-usual phase. The Employer Scorecard is designed, and officers will start to issue the cards in the new year. Officers consider the action 99% complete, however a request of a 3-month extension is made to complete the work.

Audit strategy 2025/26

14. The aims and objectives of the Fund’s package of commissioned audits is to ensure independent assurance that all the laws, regulations & practice by which the Fund operates are being appropriately adhered to. In addition, to enable a dynamic audit strategy by which the oversight of key operations, new practices and innovations can be monitored:

15. For the Scheme Year 2025/26 the proposed plan of audits recommended are:

Audit	Proposed auditor	Proposed completion date	Comments
Standard Annual Audits – 2025/26			
Annual Report & Accounts	Grant Thornton	30/09/2025	For sign off and publication by 1 st December 2025
Key Financial Controls	SWAP	30/06/2025	Review of the Fund’s internal controls
Audits targeting Fund innovations, progress improvements & new regulations, based on a risk identification approach			
TPR’s General Code of Practice	Barnett Waddingham/ Internal	31/07/2025	A review against the changes made by the Fund relating to tPR’s General Code of Practice.
Pension Dashboard	SWAP	30/09/2025	A “Go-live” ready review of internal controls prior to 31 October.
Payroll Migration – Unfunded Benefits	SWAP	30/09/2025	A review of internal controls relating to the migrated payroll from Altair to Oracle.
Customer Service Excellence	CSI	30/09/2025	To receive accreditation
Website Accessibility	Shaw Trust	30/11/2025	To receive accreditation

16. The Committee is asked to consider whether the range of audits set out above represent the complete range of audits which need to be commissioned.

Financial Implications

17. No direct implications.

Legal Implications

18. There are no known implications from the proposals.

Environmental Impacts of the Proposals

19. There is no known environmental impact of this report.

Safeguarding Considerations/Public Health Implications/Equalities Impact

20. There are no known implications currently.

Proposals

21. The Committee is asked:

- a) to approve the risk register recommendations made by the Board and the officer assessment of risk as presented in the September version of the risk register:
- b) to note the SWAP Key Controls action log and approve an extension to all outstanding audit actions to 31 March 2025:
- c) to approve the scope of audit recommendations for 2025/26.

JENNIFER DEVINE
Head of Wiltshire Pension Fund

Report Authors: Richard Bullen (Fund Governance Manager) and Jennifer Devine (Head of Wiltshire Pension Fund)

Unpublished documents relied upon in the production of this report: NONE

Appendices:

- Appendix 1 – Legal & Regulatory update
- Appendix 2 – WPF Health Check Dashboard
- Appendix 3a – Full risk Register 1 – September 2024 version.
- Appendix 3b – Full risk Register 2 – October 2024 version.
- Appendix 4 – Administration KPIs
- Appendix 5 – SWAP Key Controls action log

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LGPS Pulse

October 2024

Melanie Durrant | Partner

6 November 2024



Welcome...

... to the October edition of BW's LGPS Pulse, our monthly news round up.

The purpose of this note is to provide you with a summary of what has been going on in the LGPS community in the past month, and explain why it may be of interest to you.

Please do share it with other team members, Committee members and Board Members. The note is written to be shared with all stakeholders, so we hope you find it useful.

For more information on any topic please get in touch with your usual contact, or the team member mentioned in the relevant piece of news. An accessible version of this document is available on request.

Any feedback is welcome.



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What LGPS news has happened this month?

Rachel Reeves' budget?

Inheritance tax and pensions

The government will bring unused pension funds and death benefits payable from a pension into a person's estate for inheritance tax (IHT) purposes from 6 April 2027. For LGPS this effectively means that any death grant payable would always fall within the estate of the deceased member for IHT purposes. Scheme administrators will be responsible for reporting and paying any IHT due.

More details can be found in the [Technical consultation - Inheritance Tax on pensions: liability, reporting and payment](#) which runs to the 22 January 2025.

Use of Public Sector Net Financial Liabilities (PSNFL ex)

The budget contained a move to the use of PSNFL ex as a target for reducing debt by 2029-30. This measure is wider than the previously used Public Sector Net Debt (PSND) and includes items such as the Student Loan book.

PSNFL ex also incorporates funded public sector pension liabilities and assets (including LGPS) which has caused a bit of excitement amongst some commentators who have interpreted it as being in support of the government's desire to restructure the LGPS and direct its investment to UK growth assets. On the other hand it could well be that the motivation for the shift to PSNFL ex is entirely to provide more headroom for government borrowing and any link to the Pensions Review is purely coincidental.

We may find out which it is on 14 November when the Chancellor is due to address the Pensions Investment Review at her Mansion House speech.

For completeness, our previous blogs on the Pensions Review can be found [here](#) and [here](#).

Cost management, Benefit Design and Administration Committee

[Melanie Durrant](#) attended the Cost Management, Benefit Design and Administration Committee meeting on 28 October. Agenda and papers [here](#).

The meeting covered a lot of the current issues in the LGPS including McCloud, Pensions Dashboards (A [written statement issued by DWP on 22 October](#) confirmed the existing timetable (31 October 2025 connection date or public service pension schemes), Gender Pensions Gap and the Pensions Investment Review.

The update around McCloud was that annual statements this year do not need to include McCloud information, and next year it will be at each fund's discretion. Software providers are working to support funds in getting the relevant data onto the system and from our point of view, we are most interested in what data can be extracted for the 2025 valuation (in England and Wales).

The Scheme Advisory Board (SAB) are trying to better understand the number of employees opting out of the LGPS. It is difficult to get data from funds and employers on opt-outs so they will be issuing a further survey to employers. The idea is that if we can better understand why employees are opting out, then action can be taken to reduce it.

Based on discussions at the meeting, we understand that MHCLG will be prioritising survivor benefits (Goodwin), Gender Pensions Gap, opt-outs and also New Fair Deal is back on the agenda. We are anticipating something to be circulated on New Fair Deal next summer.

A lot of these issues were also discussed at the last LGPS Technical Group meeting on 4 October 2024 which was attended by [Gavin Paul](#).

GAD 2024 data collection email

Each Fund should have received an email from GAD around providing data as at 31 March 2024 for the purpose of the 2024 Scheme valuation which is done by GAD. This valuation is different to the local funding valuations and will be used to feed into the 2024 Cost management process. If you have any questions or would like any support in providing this information, please let your usual contact know.

Climate scenario analysis for the 2025 valuation (England and Wales)

The four actuarial firms met this month to agree a draft of the "high level" principles for funds to consider when looking at climate risk as part of the valuation process. The draft principles are now with GAD to review and we hope to have these finalised soon.

The principles cover the number and type of scenarios to be considered as well as looking at how it should be reported.

More details to follow but please get in touch with your usual BW contact if you have any questions.



Delay in implementing the Procurement Act 2023

The Procurement Act 2023 was due to come into force on 28 October 2024 but that has now been delayed until 24 February 2025. The Government has explained that the reason for the delay is to allow time to produce and publish a revised National Procurement Policy Statement. Although this delay doesn't have an immediate impact on LGPS funds, it is important to know about the delay.

Section 37

You may be aware of recent Court of Appeal ruling and this was covered in our August edition of Pulse.

Put simply, the case is around missing actuarial confirmation that contracting-out requirements continued to be met following amendment to a scheme's rules.

We now understand that GAD think there might be two benefit changes which could be caught, and they are considering the issue further with HMT. We anticipate hearing more news on this soon.

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Your essential LGPS guide - Public Sector quarterly

In the latest issue, we dive into current and crucial topics including the Pensions Review, the impact of a new Government and investment strategy evolution. We're also proud to announce some new advisory appointments and the results of our latest client survey.

If you didn't get a copy of the e-mail and would like one, please let your usual BW contact know or sign up to our newsletters [here](#).

New publications

The 2025 valuation: what to do with the surplus?

There's been a lot of talk about emerging surplus in Local Government Pension Scheme (LGPS) funds - maybe too much talk - with funding levels allegedly ranging from 80% to 200%. With the English and Welsh 2025 valuation fast approaching, now is a good time to look at what's actually happened since the last valuation on 31 March 2022, the estimated position now, and the outlook for the 2025 valuation.

[Barry McKay](#) has written a new blog [here](#) on how to approach dealing with a surplus ahead of the 2025 valuation.

McCloud guide for administrators

LGA updated their [guidance](#) to reflect the decisions made about inclusion of McCloud benefits in annual benefit statements (as detailed above). LGA have also delivered McCloud training which was very well attended so they will look to do more in the near future.

KC Opinion on Gaza

On 24 October the SAB published [Counsel opinion on the Local Government Pension Scheme and implications of the current events concerning Gaza](#). This is in response to a number of letters sent to administering authorities which allege that they are acting unlawfully by holding, and failing to divest from, investments in companies which have been linked to the ongoing situation in the Middle East.

The opinion concludes that although it may be that actions by Israel are in breach of international law in certain respects "it is in my view clear that local authorities, in their capacity as administering authorities, are not subject to obligations imposed directly by international law. Nor, in my opinion, is there any public law obligation to have regard to such matters."



Latest LGPC Bulletin

As mentioned previously, LGPC have released Bulletin 256 for October 2024, which can be found in full [here](#).

This bulletin contains updates for all LGPS stakeholders. In addition to some of the topics we have mentioned in this issue of Pulse, some other highlights to mention include:

- Pension increases next year should be 1.7% (based on September 2024 CPI) (just awaiting confirmation from Government in the next pension increase order)
- McCloud – LGA providing lots of training and there is lots of interest in this. There is also updated admin guidance available
- Pension Dashboards – lots of resources to help funds
- On 24 October MHCLG published [SF3 data for the year ending 31st March 2024](#).
- FSS guidance – project is close to close and next steps are for approval at a couple of meetings in November, It is hoped the Minister will adopt it as statutory guidance before the end of the calendar year.

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What have the BW public sector team been up to this month?

August academy accounting

Most of the August academy accounting reports for 2024 have now been issued. Each LGPS fund should have received a copy of the pre and post 31 August accounting briefing note. This note should be distributed to employers and their auditors.

The 31 August 2024 briefing note includes information on asset ceilings and updating mortality assumptions to use the CMI 2023 core model.

We have also published a webinar [here](#) to be useful to employers. Please share a link if you haven't done so already.

If you didn't get a copy of the note and would like one, please let your usual BW contact know.

BW public sector team news

[Matthew Paton](#) has returned from his six month sabbatical and we would like to welcome him back to the world of pensions.

We are also looking forward to welcoming Alison Murray to the public sector team on 2 December. With over 20 years of experience advising LGPS funds and their employers across the UK, Alison joins us from being Head of Public Sector (pensions) at Aon to strengthen our benefits and governance offering.



What is coming up next month?

We will have the Mansion House speech on 14 November where we are expecting an update on the Pensions Investment Review. We will report back to you on key announcements which could impact on the LGPS. It sounds like the rumour of “one merged fund” are unlikely to come to anything but we will just have to wait and see what is actually announced...

Future Events

LGC Investment Awards, London

Several Funds have been nominated for awards (full list [here](#)), with the ceremony to take place at The Waldorf Hilton on 29 November. We’ve been shortlisted for Consultant/Actuary of the year. We hope to see you there!

Burns Night Conference 2025 – 23 January 2025

Our famous Burns Night Conference will be taking place on 23 January 2025. We will cover hot topics in the LGPS and will be joined by the LGA.

Please register [here](#).



<https://www.barnett-waddingham.co.uk/comment-insight/public-sector/>

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However, this report is not intended to provide and must not be construed as regulated investment advice. Returns are not guaranteed, and the value of investments may go down as well as up, so you may get back less than you invest.

The information in this report is based on our understanding of current taxation law, proposed legislation and HM Revenue & Customs practice, which may be subject to future variation.

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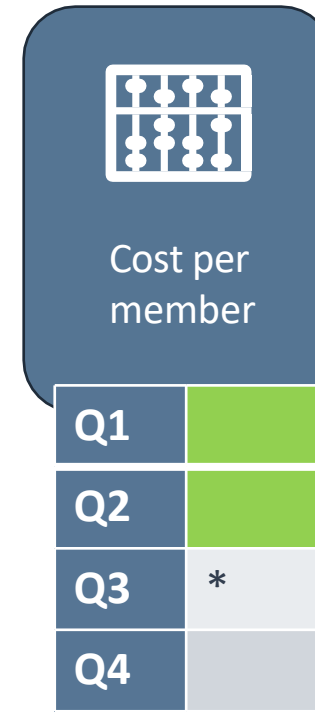
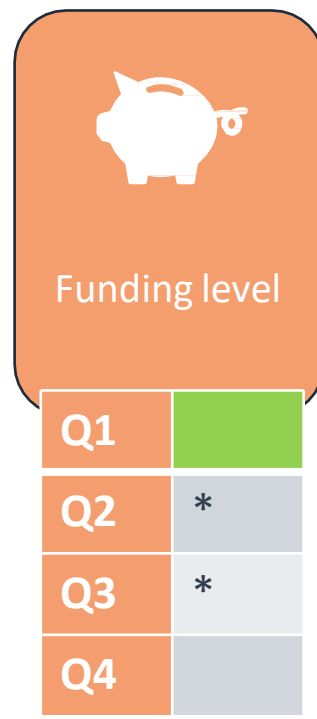
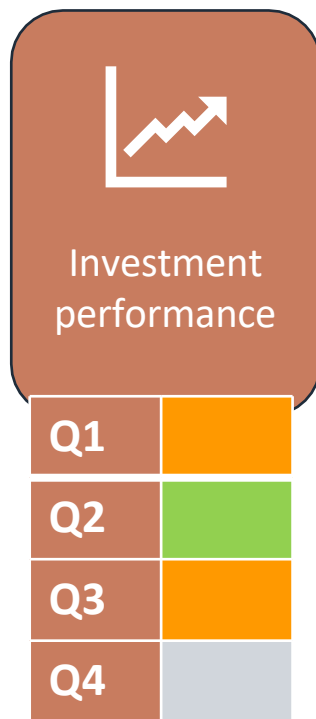
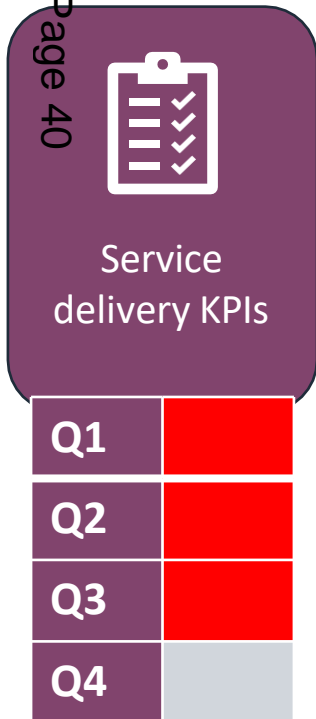


Wiltshire Pension Fund Health Check

A measure of the current health of the pension fund over the previous quarter, as outlined in the [Business Plan](#).

2024 Health Check Dashboard

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QTR3 – Jul - Sept 2024

* Due to data timings QTR is not yet available

Service Delivery KPI's



Service delivery KPIs

Q1

Q2

Q3

Q4

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Priority Category	Process	Target KPI	Cases processed	Cases open at end	Completed on target	Of which: Already beyond SLA
High	Deaths	95%	574	331	91%	47
High	Retirements	95%	911	400	43%	81
High	Refunds	95%	220	14	99%	0
High	Complaints	95%	5	1	N/A	1
Medium	Transfers Out	90%	376	244	63%	56
Medium	Transfers In	90%	72	26	72%	6
Medium	Aggregations	90%	651	1595	67%	468
Medium	Leavers	90%	2052	700	97%	46
Medium	Divorce	90%	68	20	91%	2
Medium	General	90%	1676	294	80%	69
Low	Starters	80%	1799	0	100%	0
Low	General - ABS	80%	7	1	100%	1
		Total	8411	3626	84%	777

Green would be at least KPI Target or higher
 Amber within 5% of KPI Target
 Red anything outside of 5% of KPI Target

Cases completed within SLA

Q1	81%
Q2	79%
Q3	84%
Q4	

Target to be at 95%

KPI Improvement Plan

Q1	
Q2	1177
Q3	777
Q4	

Backlog cases at 01/01/2024

1375

Target to be at < 100 backlog cases

Sample Checking

Q1	
Q2	100%
Q3	83%
Q4	

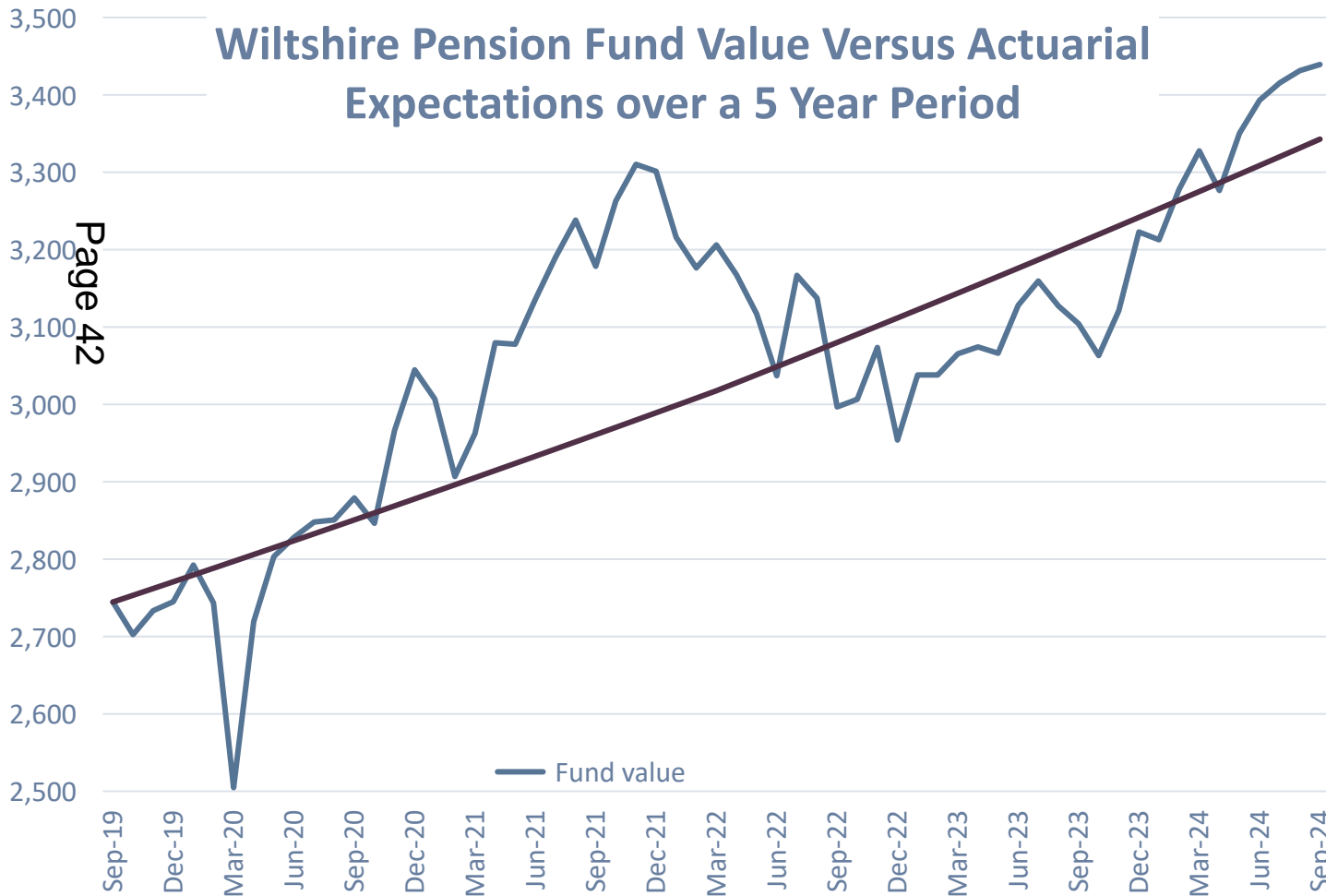
*Target to be at > 95%

To achieve an overall green rating all measures must be green and for amber at least two ratings must be green and two amber.

Investment Performance



Investment performance



Long term actuarial investment return target

4.1%

Investment Performance

3 Months 1.9%

1 Year 10.5%

5 Years 4.0%

Q1



Q2



Q3



Q4



RAG

Actual 5-year return %



> 4.1%



< 4.1% > 3.1%



< 3.1%

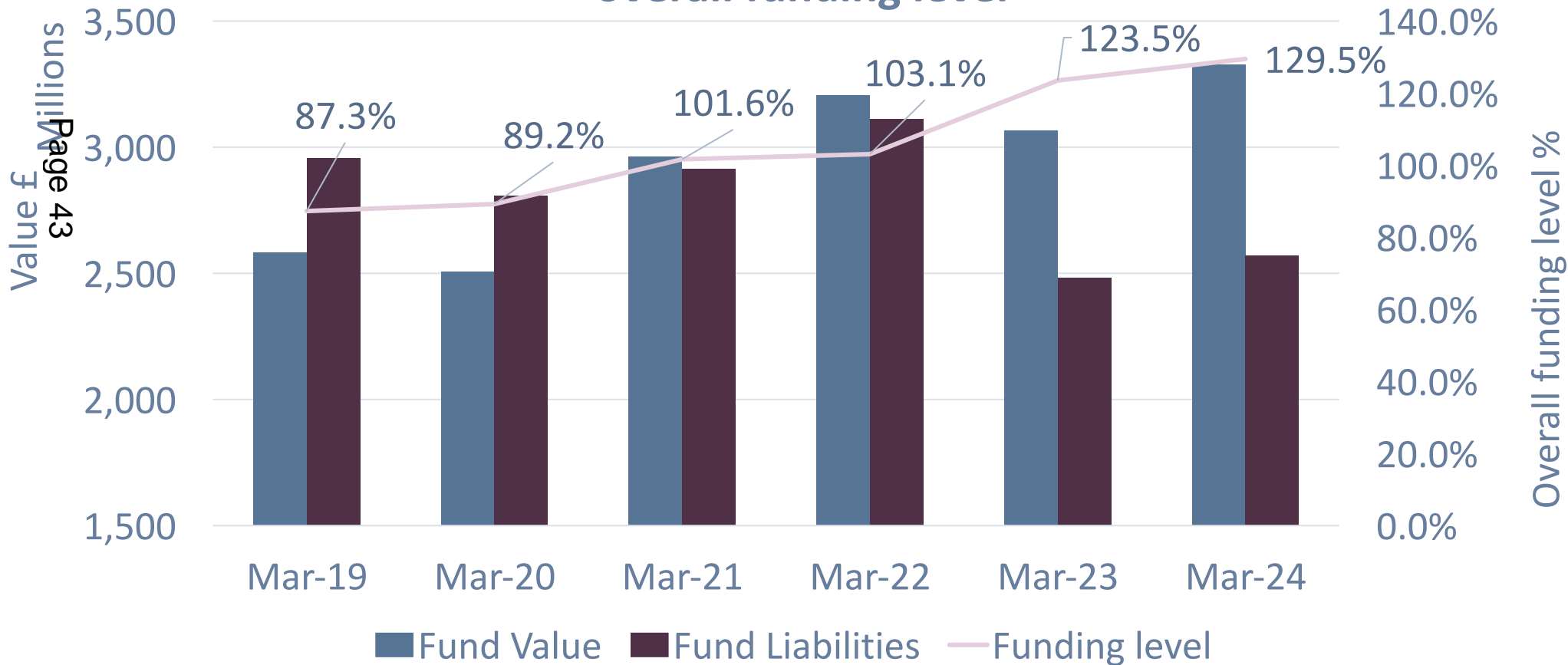
The actual fund value in the graph meets the actuarial expected value due to net cash inflow of c£100m over the period. Without this the gap would be smaller.

Funding Level



Funding level

Present value of Wiltshire Pension Fund assets, liabilities and overall funding level



Q1	Green
Q2	Grey *
Q3	Grey *
Q4	Grey

* Due to transfer of actuary funding level data not yet available for these periods

RAG	Funding %
Green	>100%
Orange	>90%
Yellow	<100%
Red	<90%

Customer Service Excellence



Customer Service Excellence

<p>Customer Insight</p>	<p>Culture</p>	<p>Information access</p>	<p>Delivery</p>	<p>Timeliness and Quality of Service</p>
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PASS	PASS	PASS	PASS	FAIL
10 compliant, one partial.	10 Compliant, one partial.	11 compliant, one partial.	9 compliant, 3 partial (3 allowed).	7 compliant, 3 partial (2 allowed).
			Partials: Meeting and publishing KPIs, customer complaints feedback.	Partials: Need to advise customers if there is a delay and meet KPIs and CS levels.

Q1	Fail
Q2	Partial
Q3	Partial
Q4	

	Customer service score*
Q1 2024	3/5
Q2 2024	2.5/5
Q3 2024	3.3/5

*4.3/5 at time of assessment

Internal Audit Rating

Key Controls Audit Rating – June 2024

Reasonable



SWAP audit rating, illustrating appropriateness and robustness of key controls

No/Limited assurance	■
Reasonable assurance	■
Substantial assurance	■

Internal audit actions progress

Not yet started, but not overdue

Not on track	■
Partially complete	■
Substantially complete	■



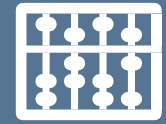
Audit ratings

Q1	■
Q2	■
Q3	■
Q4	■



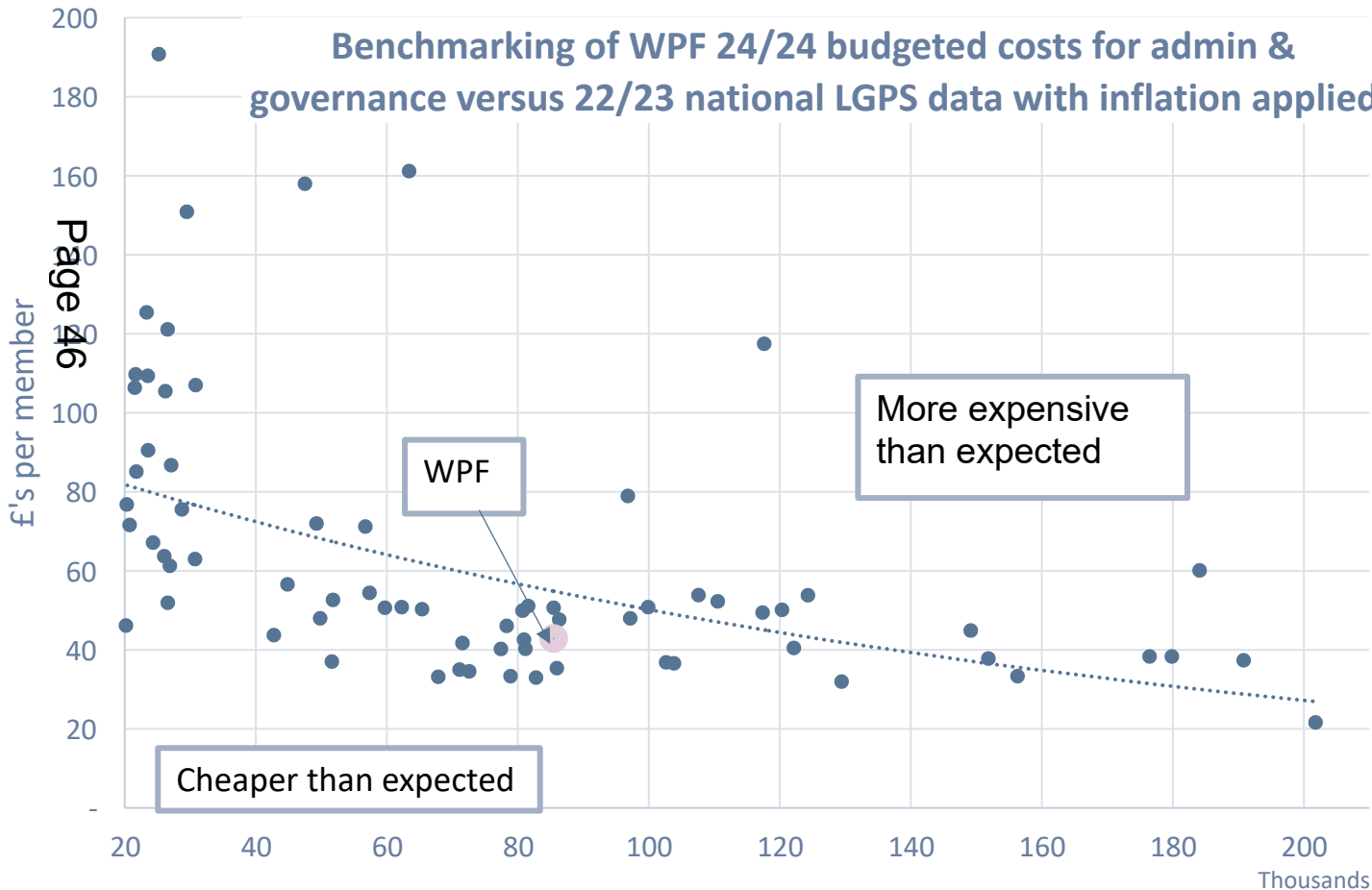
To be added in due course – PASA accreditation status

Cost per member



Cost-per-member

Benchmarking of WPF 24/24 budgeted costs for admin & governance versus 22/23 national LGPS data with inflation applied



QTR3 - Jul - Sept 2024

WPF Admin & Governance cost per member 24/25

£45.10

* New finance system has disrupted budget monitoring and forecasting, making accurate data unavailable at this time. Officer remain focused on value for money in all decisions.

Based on the benchmarking exercise expected Admin & Governance cost per member in 24/25 for WPF based on our size is **£55**

Q1	Green
Q2	Green
Q3	Grey *
Q4	Grey

RAG Cost per member relative to peers

Green	Costs below the expected cost line based on size
Orange	Costs greater than expected cost line by <10%
Red	Costs greater than expected cost line by >10%

Staff Engagement



Staff engagement

Key

<60%	Red
61-90%	Orange
91-100%	Green

Fund Focus open rates

Q1	60%
Q2	78.6%
Q3	79.5%
Q4	

*Q3 is based on July & August, Sept to follow.

Whole Fund Meeting Attendance

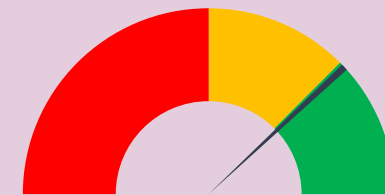
Q1	
Q2	68%
Q3	83%
Q4	

*Monitoring started in May

Q1	Orange
Q2	Orange
Q3	Orange
Q4	Grey

Team Productivity	Member Services	Employer Services
Q1	94%	79%
Q2	86%	77%
Q3	104%	74%
Q4		

2024 Staff Engagement Survey Result



Agreement levels

80%

Up from 68% last year!

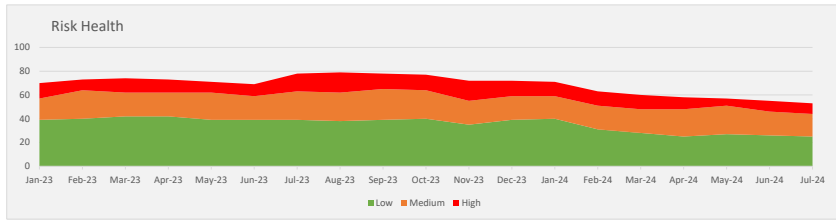
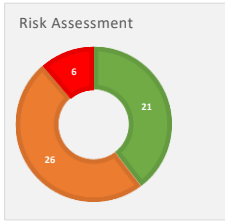
*Target 80%

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Committee Risk Register

Owner: Richard Bullen

Medium Overall Risk



Risk Area	Key Risks	Risk Assessment	Updates to note
Service Delivery	<p>A failure exists where levels of post and work volumes remain high creating a concern over the failure to meet the KPI targets. This includes backlogs which staff are seeking to reduce via the KPI Improvement Plan.</p> <p>A failure exists where the late payment of benefit and correct of benefits to members occurs, which in turn impacts the Fund's KPI targets.</p> <p>Inappropriate impact on service delivery due to network or system downtime, including proper management of system releases: & Failure to meet customer service levels in line with external accredited standards</p>	High	<p>Regular KPI meetings are held by management to ensure work is processed in accordance with the KPI Improvement Plan. Success against the KPI Improvement plan is reaping rewards and work volumes are becoming more manageable. In addition, benefits continue to be correctly paid including the recovery of payments due to the migration to Oracle.</p> <p>Weekly KPIs are now circulated and analysed and weekly insights reports have been published to the teams which show staff productivity.</p> <p>Embedding the use of bulk processing is better supporting Fund processes and output.</p> <p>Officers are working with key system providers and receiving quarterly report in order to monitor system downtime and the proper release of updated software.</p> <p>CSE & PASA accreditations are being project managed and will be introduced following signs that the KPI Improvement Plan has had a positive impact on delivery.</p>
Financial Management	<p>Failure to maintain an accurate employer contribution rate schedule, the Fund being unable to determine if it is receiving the correct contributions, or identify ceasing employers at an early stage is a key risk</p> <p>Failure to pay correct pensions, lump sums and other one off payments to pensioners.</p> <p>Failure to process Treasury Management actions on a timely basis, impacting budgeting and forecasting too.</p> <p>Failure to ensure that the running costs of the Fund continue to be aligned with the approved budget</p> <p>Failure to receive guidance relating to covenant reviews and processes could cause a financial risk to the Fund.</p>	Medium	<p>Officers maintain an Employer Contribution and Data Management Working Group to mitigate the risk of the contribution not being paid. An update is presented to members periodically.</p> <p>Officers ensure that the contributions rates are implemented & paid by all employers, and that this requirement is maintained.</p> <p>A covenant strategy is being implemented following approval of the Covenant policy.</p> <p>Officers have limited access to Oracle information to manage ledger coding & the recording of financial movements in the accounts. This has improved the Fund's ability to monitor payments and its running costs against its budget, as well as make financial returns. Procedural notes are being drafted.</p> <p>Officers are also seeking to establish active payroll reporting are part of their processes</p>
Fund Governance	<p>Failure to maintain the implemented risk and control framework and embed it into departmental culture</p> <p>Failure to conclude audits with external auditors, a number of which are several years old.</p> <p>A failure to update strategic and constitutional documentation of the Fund in order to be consistent with the new General Code of Practice</p>	Medium	<p>Officer training on the risk and control framework has been completed and regular meetings are held to reinforce the concept. Discussions relating to the integration with the Council's new Corporate Risk Management framework have gone well and officers have started to consider their strategy to implement the changes.</p> <p>Officers are working with the external auditors Deloitte and Grant Thornton to conclude historic audits.</p> <p>Officers are liaising with the Board and Committee concerning the sequencing of essential changes required in order to ensure strategic and constitutional documents are updated.</p>
Systems Management	<p>Failure to maintain the Fund's cyber security in accordance with this strategic requirement and the Fund's Business Continuity Plan.</p>	Medium	<p>Fund officers continue to liaise with the Council's Security Management and review its security arrangements including cyber insurance. Confirmation that the appropriate accreditations are in place are central to securing insurance.</p> <p>Quarterly cyber security checking to be put in place.</p>
Investment	<p>Failure of BPP to operate effectively and ensure funds are well managed, with investments being made on a timely basis to deliver their objectives.</p> <p>Failure to maintain sufficient and appropriately skilled resource to undertake RI and stewardship strategy tasks.</p> <p>Failure to effectively report the true Funding level to the Committee</p>	Medium	<p>The Fund is working with Brunel on pooling arrangements.</p> <p>A Central Govt. response on the future of pooling has been submitted by Fund officers concerning the strategic direction of BPP</p> <p>A new arrangement with BPP is enabling face to face visits concerning portfolio discussions</p> <p>Officers are working with the Evolve team to enable relevant Oracle reporting which can establish the Funding position of the Fund.</p>

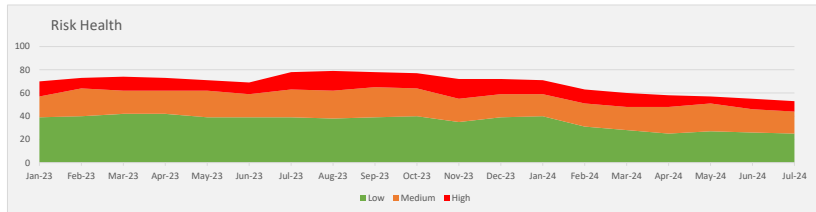
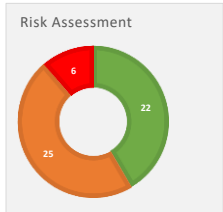
Compliance with Regulations	<p>Failure to anticipate changes in legislation which could impact the Fund adversely, specifically regarding compliance and resourcing.</p> <p>Failure to achieve statutory requirements & deadlines due to work volumes</p> <p>Failure to manage the Fund's data protection obligations due to breaches caused by a lack of understanding</p> <p>Failure to meet FCA MIFID II obligations by members having insufficient K&U to maintain the Fund's "Professional Client" status</p>	Medium	<p>Regular updates to the Committee and Board enable all stakeholders to monitor any potential changes in legislation. This work is supported by adviser guidance.</p> <p>Project planning and the holding of regular management meetings ensures deadlines are achieved.</p> <p>Communications concerning the Gov't's Pensions Review, including potential significant changes to the LGPS has caused concern. Fund officers are issuing communications of their own and liaising with Professional Advisers.</p> <p>Fund Officers will undergo data protection act refresher training and members will receive refresher guidance on MIFID as part of the Fund's annual exercise</p>
Performance	<p>Failure to deliver good customer service by maintaining performance in line with the KPI Improvement Plan. This includes poor operational performance, communication and implementation of new software and working practices</p>	Medium	<p>Weekly and Monthly meetings are held to ensure performance is maintained in line with the KPI Improvement Plan. Objectives are set to keep the plan on track. Note: Resource levels may limit progress.</p>
Employer Management	<p>Failure to maintain a list of current employer contacts requires ongoing improvement.</p> <p>Failure to effectively manage employer performance.</p> <p>Failure of employers not being set up, maintained or leaving the Fund correctly. This can effect the starting position for funding, employer liability adjustments, pooling or cessation arrangements due to untimely or incorrect information.</p>	Medium	<p>Exercises continue to be undertaken to update employer contacts, attend communication forums, review historic employer relationship issues and admission agreements and in particular issuance of employer scorecards. Where required and where empowered officers are also seeking to manage employer performance.</p> <p>New employer processes have now been embedded, however ongoing resource issues hamper progress. Officers have improved the tracking of information in relation to new set up and cessation work.</p>
Data Management	<p>Failure to meet statutory deadlines due to poor data provision from individual employers, particularly large ones which can heavily impact the Fund's data management.</p> <p>Failure to implement and maintain internal controls particularly in relation to I-Connect. Controls & checks by employers may impact data accuracy and timeliness, noting that information posted through both i-Connect & employer spreadsheets and can be provided late.</p> <p>Failure to obtain good data in respect of TUPE transfers or external payroll changes.</p> <p>Failure to correctly migrate the data associated with the pension payroll, including a special exercise concerning unfunded pensions.</p>	Medium	<p>To enable the i-Connect onboarding process officers continue to work with the outstanding employers, particularly major employers. Relevant data quality & financial checks continue.</p> <p>The Fund's employer services, accounting and project teams continue to work together to acquire the essential data from Wiltshire Council.</p> <p>Where other employers or their payroll providers are not providing data (including TUPE data) on a timely basis, or correctly, officers are actively contacting those organisations. Officers note that TUPE information is now steadily being received.</p> <p>Data in relation to the payroll migration from Oracle to Altair continues to be tested as part of parallel running. This includes a special exercises concerning unfunded pension benefits which will need to be returned to WC as a separate exercise and Heywood's migration of payroll data to the live platform.</p>
Stakeholder Engagement	No material risks are current identified in this area	Low	
Funding	No material risks are current identified in this area	Low	
Resourcing	<p>Failure to appropriately resource the Fund and adequately train staff to enable the service to be delivered in a sustainable and reliable way.</p> <p>In addition, key departures leading to a loss of crucial knowledge in the team.</p> <p>Failure to maintain an approved Committee training plan could increase the risk around a lack of knowledge and understanding in key areas</p>	High	<p>A recruitment campaign during the last few months has seen many of the vacancies filled. In addition, a training strategy is ongoing to bring new and existing officers up to speed within the department. Where a knowledge gap exists officers are still able to turn to external consultants and independent advisors for guidance.</p> <p>Whilst vacancies have been filled, key vacancies remain outstanding.</p> <p>The Board/Committee are following their approved training plans and a new training plan for 2024/25 has now been approved.</p>
Climate risk	<p>Failure to manage the risks in the investment portfolios, and/or to take advantage of the investment opportunities which arise from transition to a low carbon economy could cause the Fund to suffer material negative financial impacts.</p> <p>Failure in receiving updated climate data reporting could lead to poor decision making</p>	Medium	<p>The Fund has a climate change policy (within the responsible investment policy), decarbonisation targets, and has assessed alignment of all portfolios.</p> <p>The Fund reports against the requirements of the Task Force on Climate-related Financial Disclosures (TCFD).</p> <p>The investments overall are close to the SAA. Officers continue to liaise with BPP and other Funds in the group to ensure that the SAA of the Fund's climate change flightpath remains on track.</p>
Projects	<p>Failure of projects to be managed effectively, the key projects currently being McCloud and the Pensions Dashboard. Regular oversight is provided by the management team, Committee and Board to avoid projects failing.</p> <p>Failure of software applications being supported in the future such as MSS requires a project to be put in place to manage change to a new platform</p>	Medium	<p>McCloud calculation routines have been run and its is anticipated that only about 200 potential members will be effected.</p> <p>A Pension Dashboard interface procurement is underway with a view to being completed by December 2024.</p> <p>The external provider will not support MSS after October 2025. A project plan is to be created to migrate the Fund's services to the new platform.</p>
Reputational risk	<p>Failure to manage the Fund's reputation due to factors such as government policy, press attention, poor service delivery, controversial investments, failure to achieve our climate targets, failure to achieve statutory reporting requirements, breaches of law and regs, and other factors beyond the Fund's control.</p>	Medium	<p>Officers are monitoring the Fund's public image to manage signs of increased scrutiny on the LGPS and its potential impact on Fund's reputation</p>
Other External Risks	No "other" risks currently identified.	Low	

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Committee Risk Register

Owner: Richard Bullen

Medium Overall Risk



Risk Area	Key Risks	Risk Assessment	Updates to note
Service Delivery	<p>A failure exists where levels of post and work volumes remain high creating a concern over the failure to meet the KPI targets. This includes backlogs which staff are seeking to reduce via the KPI Improvement Plan.</p> <p>A failure exists where the late payment of benefit and correct of benefits to members occurs, which in turn impacts the Fund's KPI targets.</p> <p>Inappropriate impact on service delivery due to network or system downtime, including proper management of system releases; & Failure to meet customer service levels in line with external accredited standards</p>	High	<p>Regular KPI meetings are held by management to ensure work is processed in accordance with the KPI Improvement Plan. Success against the KPI Improvement plan is reaping rewards and work volumes are becoming more manageable. In addition, benefits continue to be correctly paid including the recovery of payments due to the migration to Oracle.</p> <p>Weekly KPIs are circulated and analysed and weekly insights reports are published to the teams which show staff productivity.</p> <p>Embedding the use of bulk processing is better supporting Fund processes and output.</p> <p>Officers are working with key system providers and receiving quarterly report in order to monitor system downtime and the proper release of updated software. CSE & PASA accreditations are being project managed and will be introduced following signs that the KPI Improvement Plan has had a positive impact on delivery.</p>
Financial Management	<p>Failure to maintain an accurate employer contribution rate schedule, the Fund being unable to determine if it is receiving the correct contributions, or identify ceasing employers at an early stage is a key risk</p> <p>Failure to pay correct pensions, lump sums and other one off payments to pensioners.</p> <p>Failure to process Treasury Management actions on a timely basis, impacting budgeting and forecasting too.</p> <p>Failure to ensure that the running costs of the Fund continue to be aligned with the approved budget</p> <p>Failure to receive guidance relating to covenant reviews and processes could cause a financial risk to the Fund.</p>	Medium	<p>Officers maintain an Employer Contribution and Data Management Working Group to mitigate the risk of the contribution not being paid. An update is presented to members periodically.</p> <p>Officers ensure that the contributions rates are implemented & paid by all employers, and that this requirement is maintained.</p> <p>A covenant strategy is being implemented following approval of the Covenant policy.</p> <p>Officers have limited access to Oracle information to manage ledger coding & the recording of financial movements in the accounts. This has improved the Fund's ability to monitor payments and it running costs against its budget, as well as make financial returns. Procedural notes are being drafted.</p> <p>Officers are also seeking to establish active payroll reporting are part of their processes</p>
Fund Governance	<p>Failure to maintain the implemented risk and control framework and embed it into departmental culture</p> <p>Failure to conclude audits with external auditors, a number of which are several years old.</p> <p>A failure to update strategic and constitutional documentation of the Fund in order to be consistent with the new General Code of Practice</p>	Medium	<p>Officer training on the risk and control framework has been completed and regular meetings are held to reinforce the concept. The integration with the Council's new Corporate Risk Management framework are underway with officers starting to implement changes to the Fund Risk Register.</p> <p>Officers are working with the external auditors Deloitte and Grant Thornton to conclude historic audits.</p> <p>Officers are liaising with the Board and Committee and Democratic Services concerning the sequencing of essential changes and their approval concerning constitutional documents.</p>
Systems Management	<p>Failure to maintain the Fund's cyber security in accordance with this strategic requirement and the Fund's Business Continuity Plan.</p>	Medium	<p>Fund officers continue to liaise with the Council's Security Management and review its security arrangements including cyber insurance. Confirmation that the appropriate accreditations are in place are central to securing insurance.</p> <p>Quarterly cyber security checking to be put in place.</p>
Investment	<p>Failure of BPP to operate effectively and ensure funds are well managed, with investments being made on a timely basis to deliver their objectives.</p> <p>Failure to maintain sufficient and appropriately skilled resource to undertake RI and stewardship strategy tasks.</p> <p>Failure to effectively report the true Funding level to the Committee</p>	Medium	<p>The Fund is working with Brunel on pooling arrangements.</p> <p>A Central Govt. response on the future of pooling has been submitted by Fund officers concerning the strategic direction of BPP. Following the Mansion House announcement a further consultation is underway.</p> <p>A new arrangement with BPP is enabling face to face visits concerning portfolio discussions</p> <p>Officers are working with the Evolve team to enable relevant Oracle reporting which can establish the Funding position of the Fund.</p>

Compliance with Regulations	<p>Failure to anticipate changes in legislation which could impact the Fund adversely, specifically regarding compliance and resourcing.</p> <p>Failure to achieve statutory requirements & deadlines due to work volumes</p> <p>Failure to manage the Fund's data protection obligations due to breaches caused by a lack of understanding</p> <p>Failure to meet FCA MiFID II obligations by members having insufficient K&U to maintain the Fund's "Professional Client" status</p>	Medium	<p>Regular updates to the Committee and Board enable all stakeholders to monitor any potential changes in legislation. This work is supported by adviser guidance. Project planning and the holding of regular management meetings ensures deadlines are achieved.</p> <p>Communications concerning the Govt's Pensions Review, including potential significant changes to the LGPS has caused concern. The Autumn budget was largely silent, however the Chancellor's Mansion House speech outlined future steps. Fund officers are liaising with Professional Advisers next steps. Fund Officers will undergo data protection act refresher training and members will receive refresher guidance on MiFID as part of the Fund's annual exercise</p>
Performance	<p>Failure to deliver good customer service by maintaining performance in line with the KPI Improvement Plan. This includes poor operational performance, communication and implementation of new software and working practices</p>	Medium	<p>Weekly and Monthly meetings are held to ensure performance is maintained in line with the KPI Improvement Plan. Objectives and targets are set to keep the plan on track. Note: Resource levels may limit progress.</p>
Employer Management	<p>Failure to maintain a list of current employer contacts requires ongoing improvement.</p> <p>Failure to effectively manage employer performance.</p> <p>Failure of employers not being set up, maintained or leaving the Fund correctly. This can effect the starting position for funding, employer liability adjustments, pooling or cessation arrangements due to untimely or incorrect information.</p>	Medium	<p>Exercises continue to be undertaken to update employer contacts, attend communication forums, review historic employer relationship issues and admission agreements and in particular issuance of employer scorecards. Where required and where empowered officers are also seeking to manage employer performance.</p> <p>New employer processes have now been embedded, however ongoing resource issues hamper progress. Officers have improved the tracking of information in relation to new set up and cessation work.</p>
Data Management	<p>Failure to meet statutory deadlines due to poor data provision from individual employers, particularly large ones which can heavily impact the Fund's data management.</p> <p>Failure to implement and maintain internal controls particularly in relation to I-Connect. Controls & checks by employers may impact data accuracy and timeliness, noting that information posted through both I-Connect & employer spreadsheets and can be provided late.</p> <p>Failure to obtain good data in respect of TUPE transfers or external payroll changes.</p> <p>Failure to correctly migrate the data associated with the pensioner payroll, including a special exercise concerning unfunded pensions.</p>	Medium	<p>To enable the I-Connect onboarding process officers continue to work with the outstanding employers, particularly major employers. Relevant data quality & financial checks continue.</p> <p>The Fund's employer services, accounting and project teams continue to work together to acquire the essential data from Wiltshire Council and other employers. All employers successfully provided their data in September. Where other employers or their payroll providers are not providing data (including TUPE data) on a timely basis, or correctly, officers are actively contacting those organisations. Officers note that TUPE information is now steadily being received.</p> <p>Data in relation to the payroll migration from Oracle to Altair has been successfully migrated. A special exercise concerning unfunded pension benefits which will need to be returned to WC can now commence.</p>
Stakeholder Engagement	No material risks are current identified in this area	Low	
Funding	No material risks are current identified in this area	Low	
Resourcing	<p>Failure to appropriately resource the Fund and adequately train staff to enable the service to be delivered in a sustainable and reliable way. In addition, key departures leading to a loss of crucial knowledge in the team.</p> <p>Failure to maintain an approved Committee training plan could increase the risk around a lack of knowledge and understanding in key areas</p>	High	<p>Many vacancies have been filled and a training strategy is ongoing to bring new and existing officers up to speed within the department. Where a knowledge gap exists officers are still able to turn to external consultants and independent advisors for guidance.</p> <p>Whilst vacancies have been filled, key vacancies remain outstanding. The Board/Committee are following their approved training plans and a new training plan for 2024/25 has now been approved.</p>
Climate risk	<p>Failure to manage the risks in the investment portfolios, and/or to take advantage of the investment opportunities which arise from transition to a low carbon economy could cause the Fund to suffer material negative financial impacts.</p> <p>Failure in receiving updated climate data reporting could lead to poor decision making</p>	Medium	<p>The Fund has a climate change policy (within the responsible investment policy), decarbonisation targets, and has assessed alignment of all portfolios. The Fund reports against the requirements of the Task Force on Climate-related Financial Disclosures (TCFD).</p> <p>The investments overall are close to the SAA. Officers liaise with BPP and other Funds in the group to ensure that the SAA of the Fund's climate change flightpath remains on track.</p>
Projects	<p>Failure of projects to be managed effectively, the key projects currently being McCloud and the Pensions Dashboard. Regular oversight is provided by the management team, Committee and Board to avoid projects failing.</p> <p>Failure of software applications being supported in the future such as MSS requires a project to be put in place to manage change to a new platform</p>	Medium	<p>McCloud calculation routines have been run and its is anticipated that only about 200 potential members will be effected.</p> <p>A Pension Dashboard interface procurement is underway with a view to being completed by December 2024. However, procurement has been slow and consequently the risk has increased due to volume of work required to be ready in time. Key issues are an interface appointment and data quality. The external provider will not support MSS after October 2025. A project plan is to be created to migrate the Fund's services to the new platform.</p>
Reputational risk	<p>Failure to manage the Fund's reputation due to factors such as government policy, press attention, poor service delivery, controversial investments, failure to achieve our climate targets, failure to achieve statutory reporting requirements, breaches of law and regs, and other factors beyond the Fund's control.</p>	Medium	<p>Officers are monitoring the Fund's public image to manage signs of increased scrutiny on the LGPS and its potential impact on Fund's reputation</p>
Other External Risks	No "other" risks currently identified.	Low	

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Appendix 3 – Administration KPIs

An analysis of the administrative performance over the period

1 August 2024 – 31 October 2024



Internally set targets

The Fund's internally set administration targets are set to help meet the goals of the Fund's business plan. The Fund also must meet certain disclosure targets, but these will now only be monitored on an exceptions basis (i.e. if we are failing).

Table 1 Performance over 1 August 2024 to 31 October 2024

Priority Category	Process	SLA (Working days)	Target KPI	Closing cases prior report	Terminated Cases	Cases Open at Start	Cases received	Cases processed	Cases open at end	Case Change	Completed on target
High	Deaths	5/10/20 days	95%	298	0	298	441	420	319	●	89%
High	Retirements	10/20 days	95%	329	0	329	916	877	368	●	38%
High	Refund	10 days	95%	16	14	16	217	225	8	●	100%
High	Complaints	5/46 Days	95%	3	0	3	2	3	2	●	67%
Medium	Transfer Out	10/20 days	90%	179	140	179	369	321	227	●	70%
Medium	Transfer In	10/15/20 days	90%	11	0	11	70	66	15	●	63%
Medium	Aggregation	23 days – 1 year	90%	1306	0	1306	769	595	1480	●	74%
Medium	Leaver	23 days – 46 days	90%	365	297	365	2469	2240	594	●	97%
Medium	Divorce	20 – 25 days	90%	17	13	17	52	50	19	●	86%
Medium	General	5/10/46/69 Days	90%	420	105	420	1451	1660	211	●	54%
Low	Starters	46 Days	80%	0	2	0	1812	1812	0	●	99%
Low	General – ABS	1/5 Days	80%	0	0	0	8	7	1	●	100%

*red alert shown for anything below 10% of tolerable performance and amber within 5%

Process	Reply Due	In Office	Of which: Currently within SLA	Of which: Already beyond SLA
Deaths	293	26	303	16
Retirements	263	105	323	45
Refund	8	0	7	1
Complaints	2	0	0	2
Transfer Out	132	95	194	33
Transfer In	11	4	13	2
Aggregation	552	928	1189	291
Leaver	389	205	552	42
Divorce	13	6	14	5
General	178	33	198	13
Starters	0	0	0	0
General - ABS	1	0	0	1
Total	1842	1402	2793	451



*Table 1 shows the Fund's process times against the timeframes set out

in the administration strategy

Table 2: Monthly breakdown of completion on target percentage

Priority Category	Process	SLA (Working days)	Target KPI	Financial	Yearly	Yearly	Yearly	August	September	October
				QTR4 Oct - Dec 2023	QTR1 Jan - Mar 2024	QTR2 Apr - Jun 2024	QTR3 Jul - Sep 2024	Completed on target	Completed on target	Completed on target
High	Deaths	5/10/20 days	95%	92%	77%	77%	91%	93%	90%	82%
High	Retirements	10/20 days	95%	70%	55%	63%	43%	73%	46%	37%
High	Refunds	10 days	95%	100%	99%	99%	99%	99%	100%	100%
High	Complaints	5/46 Days	95%					100%		0
Medium	Transfers Out	10/20 days	90%	66%	52%	68%	63%	76%	65%	69%
Medium	Transfers In	10/15/20 days	90%	68%	60%	44%	72%	50%	81%	88%
Medium	Aggregations	23 days - 1 year	90%	83%	77%	68%	67%	64%	90%	71%
Medium	Leavers	23 days - 46 days	90%	79%	84%	79%	97%	95%	95%	97%
Medium	Divorce	20 - 25 days	90%	80%	73%	66%	91%	95%	100%	88%
Medium	General	5/10/46/69 Days	90%			74%	80%	75%	90%	87%
Low	Starters	46 Days	80%			100%	100%	100%	100%	100%
Low	General - ABS	47 Days	80%				100%	100%		0

*red alert shown for anything below 10% of target KPI

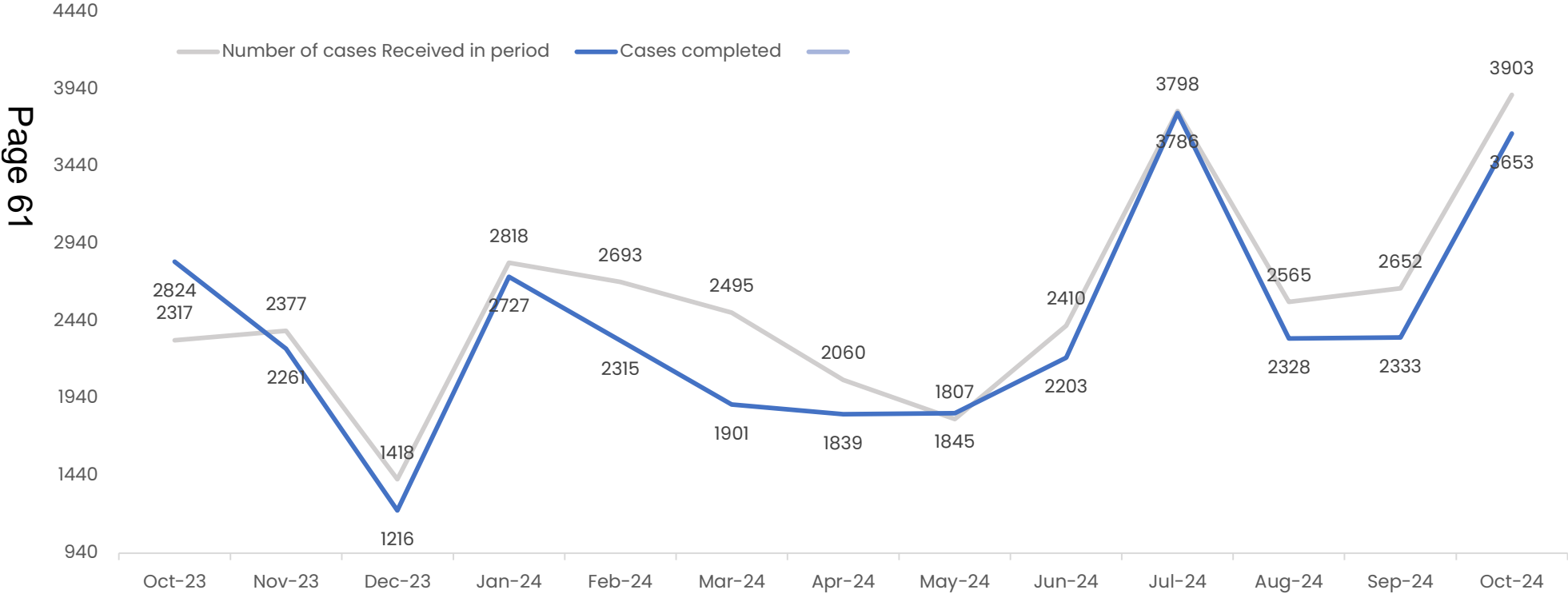
Table 3: 'In Office' (as at 31 October 2024)

*'In Office' refers to any cases that are currently ready to be worked on

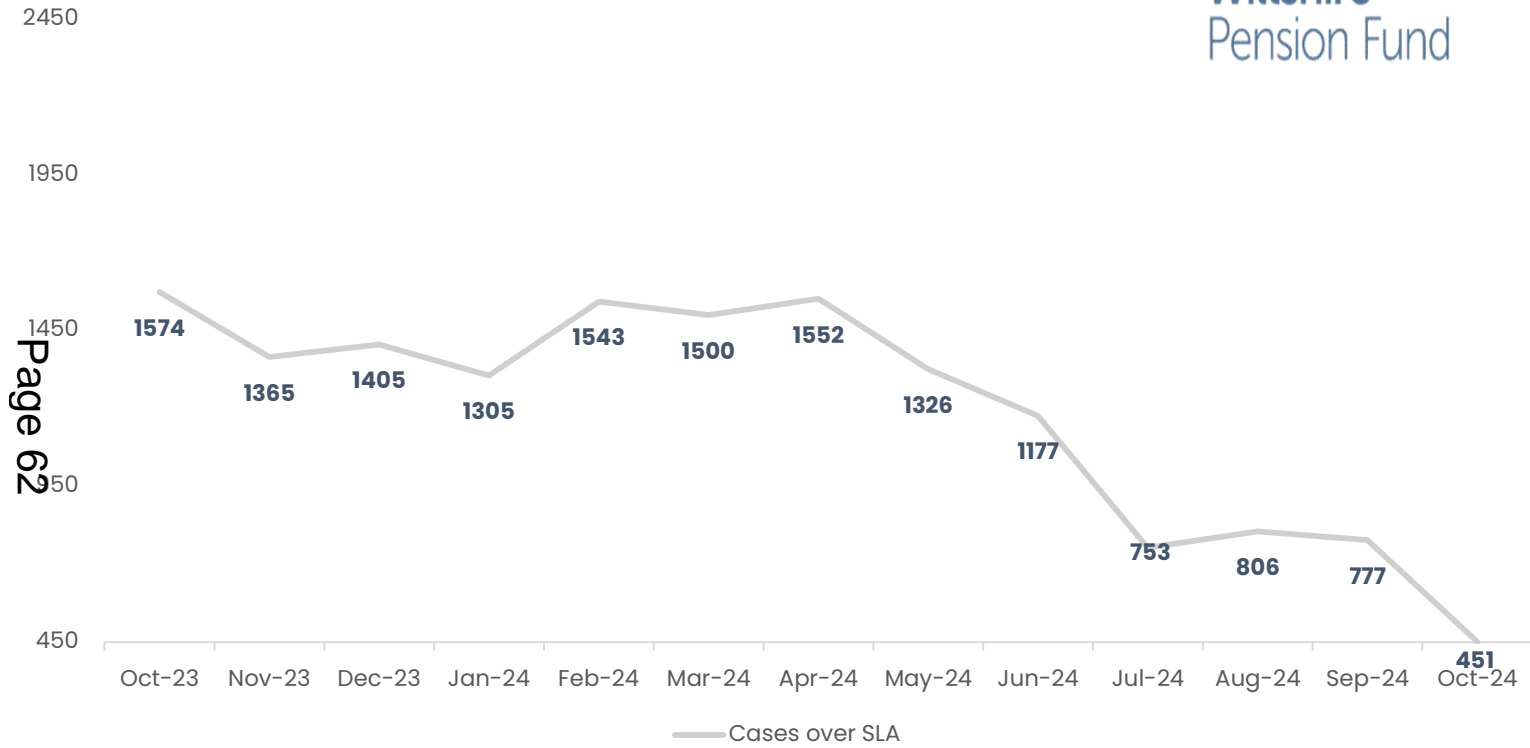
Priority level	Process	Age analysis (working days)							Total
		1-40	2-6 months	6-12months	1year +	2year +	3year +	4 year +	
High	Deaths	25	0	1	0	0	0	0	26
High	Retirements	95	8	1	0	1	0	0	105
High	Refunds	0	0	0	0	0	0	0	0
High	Complaints	0	0	0	0	0	0	0	0
Medium	Transfers Out	84	11	0	0	0	0	0	95
Medium	Transfers In	4	0	0	0	0	0	0	4
Medium	Aggregations	263	524	129	4	4	4	0	928
Medium	Leavers	204	1	0	0	0	0	0	205
Medium	Divorce	4	2	0	0	0	0	0	6
Medium	General	31	2	0	0	0	0	0	33
Low	Starters	0	0	0	0	0	0	0	0
Low	General - ABS	0	0	0	0	0	0	0	0
	Total	710	548	131	4	5	4	0	1402

*The leaver and aggregation scores are reliant on bringing case numbers down and therefore the existing KPI target scores are likely to worsen while older cases are cleared. With Officers and working on aggregations we can see that this is starting to have an impact on the statistics.

Comparison of cases completed in period vs cases received



Open cases over SLA



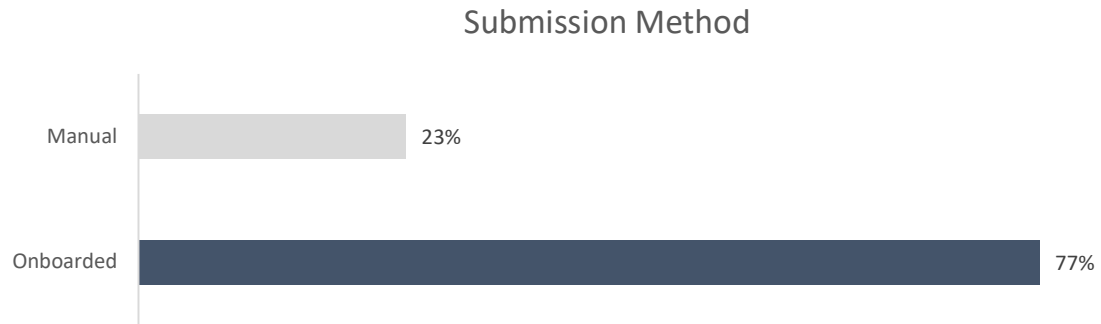
*August 2024 onwards includes all cases including cases on reply due



4. i-Connect onboarding progress figures at end of period

* I-Connect onboarding resumed with effect from 01/02/2024*

Manual Submissions	138	23%
Onboarded	41	77%
Total	179	100%



5. MSS (My Wiltshire Pension) take up

	Active	Deferred	Total
Registered	13,105	14,911	28,016
Percentage	47%	53%	100%

*Excludes members with password resets or disabled account.

Internal targets - Employers



6. i-Connect submission performance - as at 27/11/2024

completed 27/11/2024

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Size of Scheme	Aug			Sep			Oct		
	On-time	Late	Submitted on Target	On-time	Late	Submitted on Target	On-time	Late	Submitted on Target
Small	72	23	76%	85	14	86%	79	20	80%
Medium	7	3	70%	6	5	55%	8	3	73%
Large	1	4	20%	2	3	40%	1	20	5%
Total	80	30	73%	93	22	81%	88	43	67%

*size of scheme - small <250members, medium 250 members +, large >1000 members

*Newly onboarded employers are not included with the performance statistics as typically more support is needed in the initial months and therefore the normal deadlines do not apply.

*All employers onboarded on to i-Connect are required to submit their return by the 10th of the month following the month the data relates to.

*Figures pulled within the period required for the report - any submissions outside these dates will not be included

tPR Data performance measures

The Pension Regulator (tPR) helps regulate each LGPS's Fund compliance with various legislation. In respect of administrative performance, tPR focuses on Common and Conditional data measures. The Fund is required to submit its scores against these measures each year as part of its Scheme Return

98

tPR Common Data

Percentage score at 31 October 2024

Common Data various data measures it expects all Pension Funds to hold (e.g., name, address etc).

97

tPR Conditional Data

Percentage score at 31 October 2024

Conditional/Scheme Specific data scores are those data types which are needed for the administration of that specific scheme. For the LGPS, the Scheme Advisory Board (SAB) has determined the relevant data items.

93.8

Active Annual Benefit Statements (ABS)

Percentage score at 31 October 2024

*The Fund is required under the LGPS Regulations to produce active ABSs by the 31 August of each year The Fund currently uploads all ABS to the member portal. *stats for available data**

100

Pension Saving Statements

Percentage score at 31 October 2024.

All Pension Saving Statements for members with of Pension Input amount greater than £40,000 for the 2023/24 tax year were sent prior to the deadline of 5th October. 10 members had a Pension Input Amount greater than the Annual Allowance of £60,000.

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Appendix 1:

Table 1 – Key Controls Report 2024/25 - Progress against outstanding internal audit recommendations:

No	Priority score	Issue	Recommendation	Agreed management action	Agreed management timescale	Est. Progress	Progress at November 2024
1	2	Risk Register	<p>There are elements of the Fund’s current risk management system that require improvement and some gaps identified, such as:</p> <ol style="list-style-type: none"> 1) No documented risk management policy in place: 2) No guidance for officers on risk wording: 3) No set risk appetite: 4) Dates missing from the risk register to identify when a risk was added, reviewed, or updated; and 5) No recording of inherent risk on the register. <p>The Council has recently launched a new risk management framework, and the expectation is that the Pension Fund should now be working towards compliance with the Council’s own risk management framework.</p>	<p>The Pension Fund’s arrangements will be further developed to align with the Council’s framework. Plans are in place to perform a gap analysis and identify the necessary actions with the Pension Fund Committee.</p> <p>Officers will work with the S151 officer to ascertain what the risks to the Council are and where these sit as they do not form part of the operational risk register.</p>	31 December 2024	85%	<p>Agreeing risk management arrangements</p> <ol style="list-style-type: none"> 1) A paper was submitted to the Pension Fund Committee on 11 July, outlining the overall risk management situation. The recommendations were approved by Committee. Officers liaised with the s151 Officer, and the Corp. services team concerning the scoping and implementation arrangements. These were agreed. <p>Updating the Fund’s risk register</p> <ol style="list-style-type: none"> 2) Officers have implemented their project plan. A revised template has been drafted and Fund Managers requested to update their areas of risk by cause, event and effect, as well as allocate risk appetite scores in line with new impact framework. New and strategic risk are also being incorporated and a paper is being presented to the Committee in December. If approved, a policy will also be drafted and submitted to the Committee in due course once all work has been completed. <p>Integration with the Council’s Risk Management framework</p> <ol style="list-style-type: none"> 3) As above.
2	2	Quality Assurance	<p>A new Quality Assurance (QA) process, with a QA and Sample Checking Guide was approved in April 2024. The new process addresses weaknesses, namely:</p> <ol style="list-style-type: none"> 1) The number of cases to be quality checked (25 per week); and 2) A clear separation between the quality assurance and authorisation process. 	<p>Officers will create a log of the QA work that is taking place and will continue to develop this log and monitor the number of QA checks taking place each week.</p> <p>The policy has been updated to address the</p>	31 December 2024	70%	<ol style="list-style-type: none"> 1) Sample checking is being carried out and results are shared on the Fund’s health check performance dashboard for full transparency. 2) Full implementation of these actions is pending the successful recruitment of a Quality Assurance Lead.

			<p>However, the following issues exist with the process:</p> <ol style="list-style-type: none"> 1) There is no separate record (log) of the quality checks that are being carried out. This would help provide assurances that samples are representative the data to allow trend analysis work: 2) There is no monitoring of how many QA checks are carried out against the target; and 3) It should be written into the guide that the authorisation & QA of work should be separated, so that one person cannot complete both functions on a case. 	issue of quality checkers also carrying out authorisations.			
3	3	Introduction of "i Connect", the Employer Scorecard and Administrative Charges	<p>The Business Plan 2024-27 includes an objective to have all Employers using "i Connect" by 2027. In addition, the Fund should implement an Employer Scorecard and Administrative Charging for participating employers who are not using "i-Connect" correctly.</p> <p>The fund should also consider charging interest for late payments & completing the implementation of i-Connect before 2027.</p>	Officers will continue to encourage employers to join i-Connect. Officers have carried out research into how other Fund's administer interest for late payments and our own policy on this will be agreed as part of the overarching Administration Strategy.	31 December 2024	99%	<p>All employers migrated to i-Connect.</p> <ol style="list-style-type: none"> 1) The officers project plan to complete the migration of scheme employers to i-Connect is progressing well with many of the large employers now on i-Connect, including SBC. There are currently about 14 employers outstanding, down from 35 to migrate, noting that the process will fall into a business-as-usual arrangement whereby only new employers etc will need to be added to i-Connect as they arise. <p>Implement Employer Scorecards</p> <ol style="list-style-type: none"> 2) Officers have developed a scorecard for regular issuance to employers, however its issuance has been delayed due to officer recruitment needs. It will start to be issued by the Communications team in the new year and will at a later date add employer covenant results, currently being circulated separately. <p>Administrative charging, including interest for late i-Connect submission.</p> <ol style="list-style-type: none"> 3) A policy approving administrative charging of Scheme Employers to recover the Fund's additional costs placed on it as a result of poor administration practices by employers was made by the Committee in October.

4	3	Complaints Monitoring & Reporting	<p>Audit noted that the report from Altair contained a different number of complaints in 23/24 from that published in the final performance report. This indicates that the process relies heavily on manual intervention to obtain accurate complaints data.</p> <p>Altair reporting should be improved by upgrading Altair's existing workflows.</p>	<p>Officers agreed to update complaint reporting workflows to include clear column headings, mandatory field completions and closure determination statuses.</p>	30 September 2024	100% COMPLETED	<p>Update Altair Complaints reporting.</p> <ol style="list-style-type: none"> 1) Changes to Altair workflows and Insights reporting has been made. In effect, the reporting output is now being tested/review to confirm if it fulfils the requirement. 2) Report testing complete. Evidence file to be presented to SWAP.
5	2	KPIs, Reports & Monitoring of Staff Productivity (Outstanding 2023 action)	<p>We reviewed the KPI reports and identified the following issues:</p> <p>Inaccuracy of KPIs</p> <ol style="list-style-type: none"> 1) Aggregation KPIs were not accurate and excluded aggregations where a workflow had not been set up. 2) The Status 2 KPIs fall under the leavers data but did not include Status 2 members where a workflow had not been set up and did not include 'Status 2 Chase' workflows. 3) The backlog of transfers in allocations was not flagged as an issue. 4) The weekly KPI reports were not consistent with themselves as each week the closing position for the previous week did not agree to the new opening position. <p>KPIs not captured.</p> <ol style="list-style-type: none"> 1) No KPIs to monitor the progress of overpayment aged debt chasing. 2) No KPIs to monitor new joiners processing. 3) No KPIs to monitor amendments processing. <p>Data Quality reporting</p> <p>Active member data quality reporting is only completed on an ad hoc basis and the results are not reported to management to monitor.</p> <p>Staff Productivity</p>	<p>Officers will review the KPIs and address the inaccuracy issues identified.</p> <p>Officers will introduce KPI monitoring for overpayments, new joiners, amendments.</p> <p>Officers will regularly monitor the data quality for active members and ensure the requirements set by The Pensions Regulator are met.</p> <p>Officers will implement the staff productively monitoring report in the Employer Services Team.</p>	31 October 2024	100% COMPLETED	<p>It is considered by officers that all the elements within this recommendation have been completed. It was recognised that evidence will need to be prepared to demonstrate to SWAP that this action has been completed.</p> <p>Inaccuracy of KPIs.</p> <ol style="list-style-type: none"> 1) To evidence that the recommendation has been fulfilled <p>KPIs not captured.</p> <ol style="list-style-type: none"> 2) To demonstrate the monitoring arrangements for overpayments and aged debt chasing. <p>Data Quality Reporting</p> <ol style="list-style-type: none"> 3) To evidence that the recommendation has been fulfilled <p>Staff Productivity Reporting</p> <ol style="list-style-type: none"> 4) To evidence that the recommendation has been fulfilled

			The Member Services Team monitors staff productivity weekly through reporting however the same reporting has not yet gone live for the Employer Services Team.				
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WILTSHIRE COUNCIL

WILTSHIRE PENSION FUND COMMITTEE
12 December 2024

General Code of Practice Plan

Purpose of the Report

1. To update the Committee on the progress of implementing changes to the Fund's internal controls as a result of the new General Code of Practice.

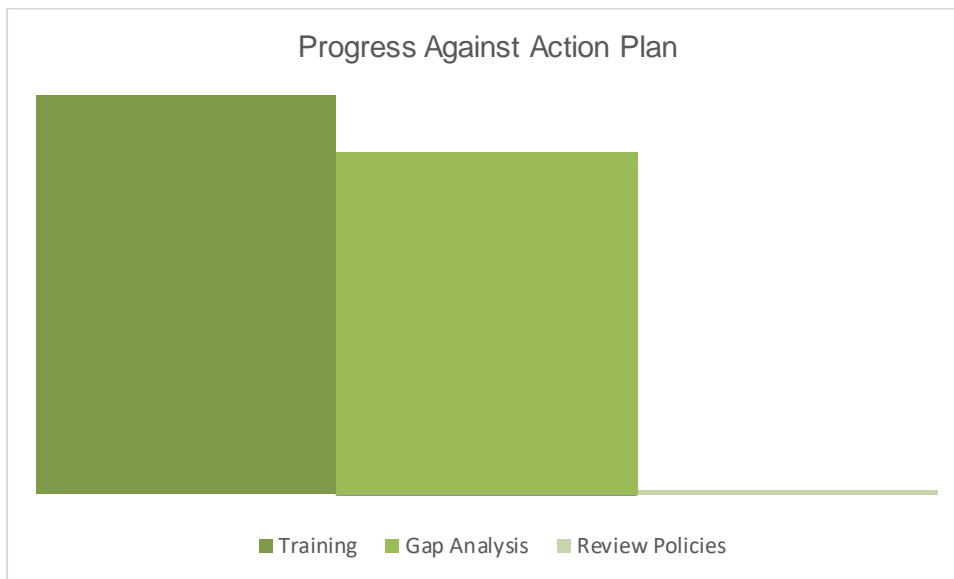
Background

2. The Pension Regulator's (tPR) General Code of Practice came into force on 28th March 2024.
3. The new General Code of Practice consolidates 10 of the existing Codes into one Code. It also addresses the governance requirements arising from the UK's implementation of IORP II which expects trustees to have an "effective system of governance" and schemes to complete an "own risk assessment".
4. We need to identify the required changes to our current processes, check current policies and procedures are fit for purpose, and implement changes where necessary.
5. In the new code, tPR refers to legal duties using the word 'must'. tPR's expectations are referred to using 'should'. tPR uses 'need' where there is no expectation or legal requirement in place, but that process is necessary to allow a scheme to operate. In some modules, tPR highlights expectations as a matter of best practice for certain schemes.
6. As a larger more sophisticated scheme, tPR would expect us to meet most of the 'should' expectations in the Code.
7. The new Code is far from just a consolidation of existing tPR standards and we are planning for a new workstream to ensure that no current activities cut across the requirements.

Action Plan

8. Training - do we understand the requirements of the new General Code of Practice?
9. Gap analysis - do we know what areas we will need to work on to be compliant?
10. Review or establish new policies - review our existing policies alongside the Code and consider whether additional policies will be required. Some may be new, for example considering climate change or cyber risk.

Progress against Action Plan



Training

11. Hymans Robertson provided the tPR General Code of Practice training sessions on 20th and 21st March 2024 for both members of the Committee and LPB and officers. This focused on the following three sections:

- tPR's expectations for the conduct and practice of those responsible for managing and administering the public sector schemes
- Themes from existing Codes condensed into shorter, topic-focused modules
- New modules covering current topics such as cyber security and scams

HYMANS  ROBERTSON

Fund Officers - TPR General Code of Practice - 2024

Ian Colvin and Alan Johnson
20th March 2024

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Gap Analysis

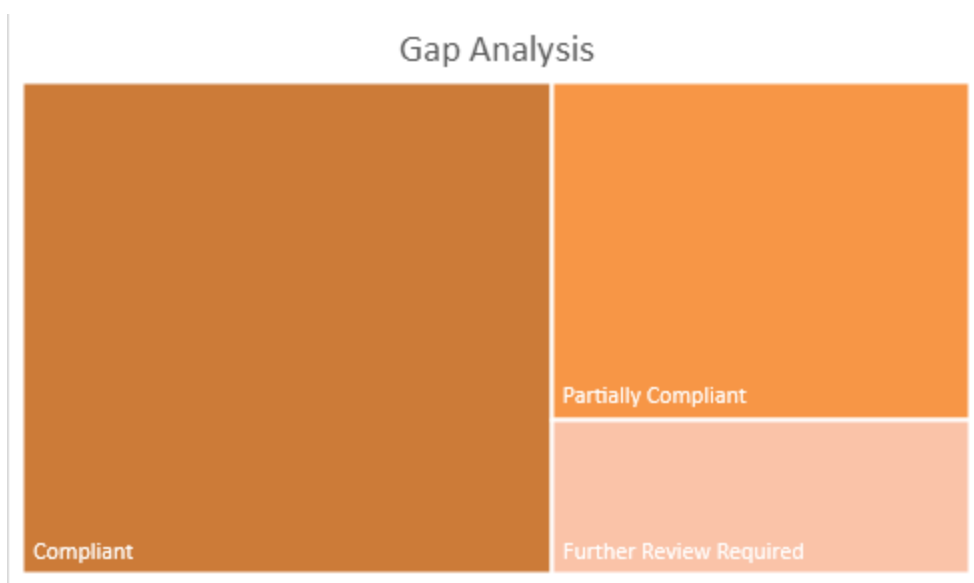
12. There are 43 areas of the Code covering Governance, Operations, Administration, Accounts and Investments.

13. Having reviewed each of these areas we have identified the following areas are Compliant, Partially Compliant or Further Review Required:

Compliant * (24)

Partially Compliant (13)

Further Review Required (6)



* To be Compliant in an area we must be confident we fulfil all 'must' and 'should' standards in the relevant area of the Code. One single item that is needing review will result in us being Partially Compliant in that area.

14. The majority of our Partially Compliant areas are where we have the relevant policies and procedures in place, but would want to strengthen them to bring them in line with our elevated standards.

Review or establish new policies

15. A full project plan has been prepared to scope out the policies requiring review. Priorities and timescales will be added to ensure we can illustrate progress made against the Code and reach our target of full compliance.

16. The role for the Quality Assurance Lead remains vacant, once this role has been appointed to we will be able to pick up the pace with progress towards evidencing full compliance.

Environmental Impact of the Proposal

17. Not applicable.

Financial Considerations & Risk Assessment

18. Not applicable

Legal Implications

19. There are no material legal implications from this report.

Safeguarding Considerations/Public Health Implications/Equalities Impact

20. There are no known implications at this time.

Proposals

21. The Committee is asked to note the progress of implementing changes to the Fund's internal controls as a result of the new General Code of Practice.

Jennifer Devine
Head of Wiltshire Pension Fund

Report Author: Mark Briggs, Operations Manager

Unpublished documents relied upon in the production of this report: NONE

WILTSHIRE COUNCIL

WILTSHIRE PENSION FUND COMMITTEE
12 December 2024

Business Continuity and Cyber Security

Purpose of the Report

1. To provide our cyber security policy for consideration by the Committee. The presentation will also include a summary on the Fund's Business Continuity Plan.

Background

2. Pension schemes hold large amounts of personal data and assets, which can make them targets for criminals. We need to take steps to protect our members and assets accordingly, which includes protecting them against 'cyber risk'.
3. Cyber risk is complex, rapidly evolving and requires a dynamic response. Our assessment of risk, controls and response plans should be reviewed regularly. Normally, this means at least annually and more frequently if there are substantial changes to our scheme's operations.
4. The Pension Regulator's (tPR) General Code of Practice came into force on 28th March 2024. Cyber Security is a new area that was introduced as part of this Code highlighting the importance that tPR is committing to this area.

Business Continuity Plan

5. The Business Continuity Plan (appendix 1 of the meeting pack) provides a framework for a coordinated response to a business disruption.
6. The plan includes:
 - establishing key service information
 - detailing the activation process for the plan
 - identifying priority functions undertaken by the service and the resources and timescales associated with their recovery
 - outlining the incident management procedures and key staff
 - identifying alternative workplace locations
 - identifying and providing contact details for staff, suppliers and partners
7. Wiltshire Council's Emergency Planning Resilience & Response Team has rated our Business Continuity Plan as GOLD and acknowledged the time and effort put into our plan.

Cyber Security Policy

8. It is recognised that cyber risk is a real and growing threat, and the aim of the Cyber Security Policy (Appendix 2 of the meeting pack) is to set out how the Fund intends to assess and manage cyber risk.
9. The Fund aims to ensure that:
 - cyber risk is integrated into the overall risk management approach of the Fund.
 - all involved understand cyber risk and their responsibilities in helping to manage it.
 - all data and asset flows relating to the Fund are identified to identify cyber risk.

- there is sufficient engagement on how those organisations are managing cyber risk.
- an incident response plan is maintained.

10. The Fund's approach to cyber governance is to follow the Seek, Shield, Solve and Review framework as summarised below:

- Seek – understand and quantify the risk.
- Shield – protect the funds and critical assets.
- Solve – be able to react and recover quickly.
- Review – check the effectiveness of our approach to cyber resilience.

11. The Fund will assess all advisers, providers and partner organisations identified by its Cyber Security Data Map (Appendix 2 of the meeting pack) to ensure they have appropriate arrangements in place to protect themselves against cyber threats, taking appropriate specialist advice as required. This will include assessing the Council as host for IT systems and services

Environmental Impact of the Proposal

12. Not applicable.

Financial Considerations & Risk Assessment

13. Not applicable

Legal Implications

14. There are no material legal implications from this report.

Safeguarding Considerations/Public Health Implications/Equalities Impact

15. There are no known implications at this time.

Proposals

16. The Committee is asked to consider and approve the business continuity and cyber security policy.

Jennifer Devine
Head of Wiltshire Pension Fund

Report Author: Mark Briggs, Operations Manager

Unpublished documents relied upon in the production of this report: NONE

WILTSHIRE PENSION FUND

BUSINESS CONTINUITY PLANNING

2024

Version 1.2

Business Continuity planning is the responsibility of everyone in the Council. Heads of Service are expected and responsible for completing a comprehensive plan at least once every 12 months which gives details on their service. This plan should then be signed off by their Director.

Staff within each service should be consulted throughout the plan writing process, any dependencies on another service/organisation, should also be consulted with.

Plan owners and deputies

Plan Owner(s)

Name: Jennifer Devine
Job Title: Head of Wiltshire Pension Fund
Location Base: Trowbridge County Hall
Signature: *Jennifer Devine*

Plan Deputy(s) (Activates BC Plan if owner isn't available)

Name: Mark Briggs
Job Title: Operations Manager
Location Base: Trowbridge County Hall
Signature: *Mark Briggs*

Verification (Plan owner's Director)

Name: Lizzie Watkin
Job Title: Director of Corporate Resources
Signature: *Lizzie Watkin*

Document Control

Version: 1.2
Date Published: 28/08/2024

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Section 1

Our Business Continuity Plan

1.0 Introduction

This section will not cover every potential incident that could occur, but should cover most of the potential outcomes, and aid in the return of services to a workable level.

Purpose

This Service Business Continuity plan provides a standardised business disruption plan for all Wiltshire Council services. It provides key service information to support the Head of Service (or nominated deputy) in returning the service to business as usual following a disruption.

This template links with several organisational plans including (*but not limited to*):

- Integrated Emergency Management Plan (Wiltshire Council)
- Wiltshire Pension Fund Business Plan
- IT Disaster Recovery Plan (Wiltshire Council)
- Cyber Security Policy and Cyber Security Response

Aim

The aim of this plan is to provide with a framework for a coordinated response to a business disruption.

Objectives

The objectives of this plan include:

- establishing key service information
- detailing the activation process for the plan
- identifying priority functions undertaken by the service and the resources and timescales associated with their recovery
- outlining the incident management procedures and key staff
- identifying alternative workplace locations
- identifying and providing contact details for staff, suppliers and partners

Scope

The plan will support Wiltshire Pension Fund to continue to deliver priority functions at a minimum acceptable level of service through business disruption as far as is reasonably practicable.

Completed plans will be uploaded and stored on the Emergency Planning SharePoint site.

<https://wiltshirecouncil.sharepoint.com/teams/EP/SitePages/Home.aspx> see Business Continuity section on left-hand menu of that page).

Key times and legislation

Key Times of Year / Month (returns, regular deadlines, events etc)

End of year – Finance Team

Payroll deadline – pensions put into payment by Member Services Team and paying regular pensions by Payroll Team

Bi-weekly payment dates for lump sums and other payments – Member Services and Employer Services Teams

i-Connect service – allowing circa 190 employers to provide us with contribution and pay data for their membership

Key Legislation / Regulations requiring urgent actions (legislation you work to, acts, laws or rules which govern your work?)

Principally the LGPS Regulations but also numerous others such as the Pensions Act, Public Services Pensions Act

Sharepoint link

This is where you can find all the Wiltshire Council BC Plans for 2024 (SharePoint)

[BC Plans 2023 SharePoint](#) (to be updated)

This is where you can find this Wiltshire Pension Fund BC Plan for 2024 (SharePoint)

[Business Continuity Plan](#)

2.0 Activation

This business continuity plan can be activated by its owner, the Service's Head of Service, or their nominated deputy.

If the incident has the potential to affect other Council services, or is beyond the capacity of the service, then Emergency Planning should be contacted. If this falls outside of working hours the On Call Duty Engineer should be contacted 07624 310636.

Plan owners may also be asked to activate or review their BC Plan by Emergency Planning if an organisation-wide incident is expected or occurring.

2.1 Responsibilities

Your initial responsibilities as a Head of Service (or BC Plan owner)

- Update your BC plan at least once every 12 months.
- Notify your Director of any issues you are experiencing.
- Notify your staff of any updates or changes.
- Notify any significant suppliers or partners of disruption as per your contacts list at the end of the plan.
- Communicate Your Plan - Consider having a WhatsApp group for emergencies – Set one up in advance, you don't have to use it unless something happens.

2.2 First Steps for any Incident

To be utilised during a disruptive event and your Business Continuity Plan is completed.

Keep Calm and Carry On.

Action	Completed?
Where can you get advice from? <ul style="list-style-type: none"> - Director or other Heads of Service - Media sources - Internal comms - Emergency Planning (for notification) 	
Notify Emergency Planning on EPRR@Wiltshire.gov.uk that you have activated your plans. Using the form detailed in Section 6.	
Start a log of what you are working on and the options you have available when making decisions, see the template in Appendix A.	
Look at what gaps you have in your high priority work streams. <ul style="list-style-type: none"> - Do you need more staff to allow the work to continue? - Do you need more time to allow the work to continue? - Do you need more space? - Do you need more resources? - Do you need another location to work from? 	
Can any of your staff be redeployed? Be prepared to offer some staff to other services.	
Contact other services in the council if you work with them regularly <ul style="list-style-type: none"> - How might their work be affected? - What won't you be able to provide them with? 	
Contact suppliers/partners/contractors <ul style="list-style-type: none"> - What won't you be able to provide or accept them with? - Inform them of how long the disruption might last for? - If communications are affected, how can they contact you? 	
Do you need any more information? Where could you get it from?	

3.0 Your Service's Functions

For each of the functions that your service provides, select the priority that best describes the possible affect(s) of a loss of your service as a result of a business disruption / emergency. One or more of the criteria in the category need to be met to be classified in the relevant priority.

If the service is not available within (x time) there could possibly be:

Priority A - Within 24 hours (e.g. you provide services on Christmas Day)

- Loss of Life
- Immediate risk to public health / public safety
- Involved in Emergency response
- National/International media interest in disruption affects
- Significant financial loss (>£5 million)

Priority B - Within 72 hours (e.g. you provide services over a bank holiday weekend)

- Short term risk to public health / public safety
- Breach of standard set by Governing body
- Regional media interest in disruption events
- Large financial loss (>£1 million)

Priority C - Within 7 days

- Minor risk to public health / safety
- Failure to meet statutory duty within 7 days
- Localised media interest in disruption to service
- Moderate impact on the delivery of Service Plan / Council Business Plan
- Limited number of complaints

In the next table we have split our Service down into its key functions .

* Allocate your Functions a Priority from A – C (A being the highest), In an incident you should always aim to continue A's and drop C's if capacity is limited

**RTO – The amount of time you can live without this operating before it causes unacceptable consequences (financial, reputation, welfare etc)

*** Minimum Number of Staff Required – How many staff as a minimum you need to operate this function before it causes unacceptable consequences

Team	Function	Details	Statutory?	*Priority (A-C)	**RTO Recovery Time Objective)	***Minimum Number of Staff required	Location	Public Facing
Accounts and Investments	Investments including cash transfers	Making investment instructions and cash transfers	Yes	A - Most Important	Between 12 - 24 hours	1	Can be home based	No
Accounts and Investments	Year end	Reporting on Year End	Yes	A - Most Important	Between 12 - 24 hours	1	Can be home based	No
Member Services	Pension calculations (in-house)	Providing members with pension calculations to allow them to make decisions about their benefits	Yes	B - Middle Importance	Between 2 - 7 days	5	Can be home based	Yes - Via Phone/Online
Member Services	Calculating pension benefits	Calculating pension benefits to put into payment and creating instructions	Yes	A - Most Important	Between 12 - 24 hours	5	Can be home based	Yes - Via Phone/Online
Member Services	Transferring benefits	Transferring pension benefits to and from other pension schemes in accordance with legislation	Yes	B - Middle Importance	Between 2 - 7 days	5	Can be home based	Yes - Via Phone/Online
Employer Services	i-Connect data	Reviewing data received from employers and ensuring correct contributions are paid	Yes	C - Least Important	More than 1 week	5	Can be home based	Yes - Via Phone/Online
Employer Services	Benefit confirmation	Providing members with confirmation of their benefits on starting and leaving n line with legislation	Yes	C - Least Important	More than 1 week	5	Can be home based	Yes - Via Phone/Online

Operations (Systems)	Systems administration	Providing administrators with access to Altair and all Altair related services	Yes	B - Middle Importance	Between 2 - 7 days	2	<i>Can be home based</i>	Yes - Via Phone/Online
Operations (Systems)	GOSS website	Providing members with access to our website	Yes	C - Least Important	More than 1 week	2	<i>Can be home based</i>	Yes - Via Phone/Online
Operations (Systems)	Pension Calculations (online)	Providing members with pension calculations to allow them to make decisions about their benefits	Yes	B - Middle Importance	Between 2 - 7 days	2	<i>Can be home based</i>	Yes - Via Phone/Online
Operations (Payroll)	New pensioners	Putting new pensions onto the payroll to be paid	Yes	A - Most Important	Between 12 - 24 hours	2	<i>Can be home based</i>	Yes - Via Phone/Online
Operations (Payroll)	Pensions Payroll	Making regular monthly pension payments to circa 19000 pensioners and dependants	Yes	A - Most Important	Between 12 - 24 hours	2	<i>Can be home based</i>	Yes - Via Phone/Online
Operations (Projects)	Ad hoc project management	Ensuring that projects are being completed within scope and time	Yes	C - Least Important	Between 2 - 7 days	1	<i>Can be home based</i>	Yes - Via Phone/Online
Employer Relations	Management of Employers	Ensuring admission agreements,	Yes	B - Middle Importance	Between 2 - 7 days	1	<i>Can be home based</i>	Yes - Via Phone/Online
Employer Relations	Employers funding	Ensuring that the funding levels reflect the employer liabilities	Yes	B - Middle Importance	More than 1 week	1	<i>Can be home based</i>	Yes - Via Phone/Online
Employer Relations	Training	Providing training to employers on their responsibilities	Yes	C - Least Important	More than 1 week	1	<i>Can be home based</i>	Yes - Via Phone/Online
			Choose an item.	Choose an item.	Choose an item.		Choose an item.	Choose an item.

4.0 Recovery Plan

Now that you have identified your priority services based on the criteria A -C consider the actions you will need to take to support the continuation of your department's activities and the re-establishment of your department back to business as usual (BAU). Consider how these priorities change over time and the measures required to be in place to manage the recovery of these activities.

Time since Disruption - *Prior to the Event (where warning has been received)*

	Activity	Recovery Measures	Role Responsible
1	Establish extent of potential BC event	Review potential event and how it will impact upon the service. Contact EPRR Team to inform them of the potential for a disruption to business, plan for event using the remainder of this plan as guidance.	Mark Briggs
2	Report event to Director	Report potential event to the head of service.	Mark Briggs
3	Notify team members of disruption	Identify any personnel and staffing issues as a result of the disruption. Make arrangements for ongoing communications with affected staff.	Mark Briggs
4	External communication	Consider who needs to be advised of the disruptions. Advise all suppliers and departments of the situation. Update the member and employer websites with a warning notification of the potential disruption.	Mark Briggs

Time Since Disruption - First Hour

	Activity	Recovery Measures	Role Responsible
1	Invoke Business Continuity	Contact EPRR Team to advise of an event causing disruption to the use of the station	Mark Briggs
2	Notify team members of disruption	Team members to view the online disaster recovery webpage with any instructions on what to do: https://markbriggs3.wixsite.com/wpfdisasterrecovery . Identify any personnel and staffing issues as a result of the disruption.	Mark Briggs
3	Identification of issue and degree of disruption	Identify what has failed and what aspects of work can no longer be completed.	Mark Briggs
4	Set up a senior management meeting	Identify the best way to set up a meeting and co-ordinate with all parties.	Mark Briggs
5	Contact vendors	Where possible contact all employers and third party service providers of the disruption.	Mark Briggs
6	Update websites	If possible, update our member facing websites with details of the disruption (if impacting members).	Mark Briggs

Time Since Disruption - 24 Hours

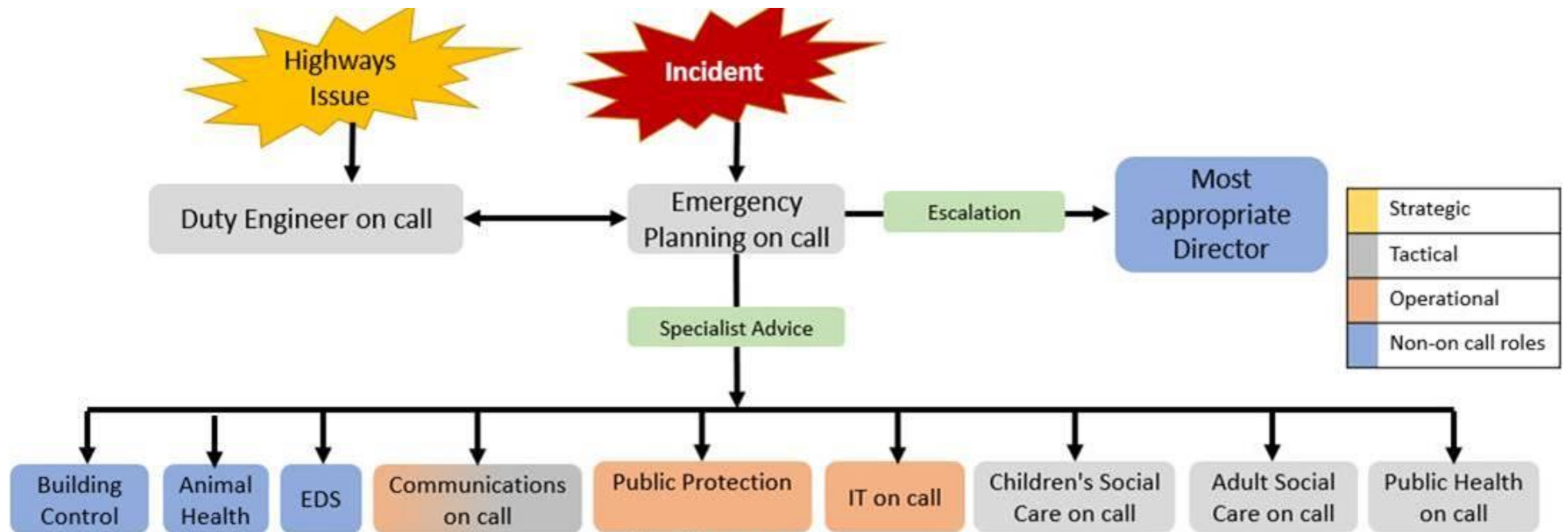
	Activity	Recovery Measures	Role Responsible
1	Monitor situation	Review actions taken by department and / or wider Service. Ensure ICT functioning as planned and consider liaising with Head of ICT.	Mark Briggs
2	Senior management meeting	Meet to identify priorities and tasks for each senior manager and area.	Mark Briggs
3	Partner and other agencies	Consider partners, suppliers and other agencies and who should be advised of the situation.	Mark Briggs
4	Ensure welfare	Review welfare arrangements and take action as required.	Mark Briggs
5	Prioritisation and action planning	Identify key aspects of work to be prioritised as part of the continuity plan and scope out what can be delayed until the disruption is over. Assign staff to specific actions to work as close to BAU as possible.	Mark Briggs
6	Identification of resource needed	If resources are needed to deal with the disruption identify who is best placed to work on the rectification	Mark Briggs
7	Managers to contact teams	Teams to be contacted by managers with continuity plan specific to the disruption and the priorities and actions scoped out in the previous activity.	Mark Briggs

Time Since Disruption - +7 days (review on-going until longer term arrangements in place or event over)

	Activity	Recovery Measures	Role Responsible
1	Communication	Ensure continued communication with all staff, internal and external stakeholders.	Mark Briggs
2	Investigation of alternatives	Where services continue to be disrupted investigate alternative methods of delivering our service.	Mark Briggs
3	Review of operational tasks	Ensure that all essential data processing operational tasks can be conducted after the disruption.	Mark Briggs
4	Review of response	Review and document the response and whether improvements to the business continuity plan are required.	Mark Briggs

5.0 Emergency Response and Escalation Structures

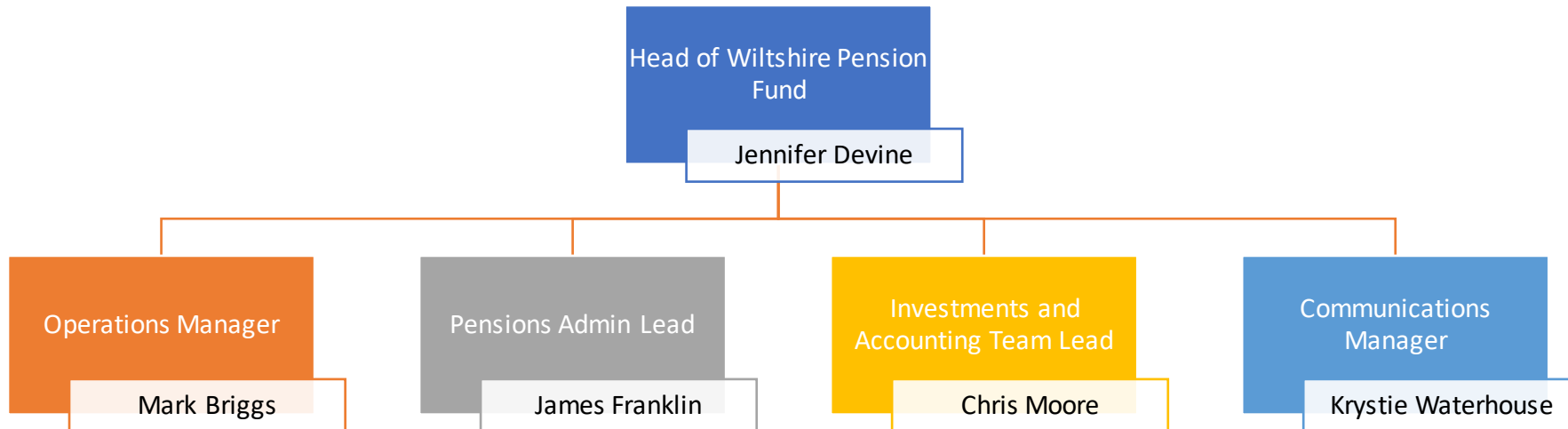
When the council is notified to an external incident that requires the response of council resources and is likely to have an impact on council services Emergency Planning coordinates the response and escalation in the following way:



5.1 Your Service Incident Response Team

Using the Blank flow chart below – detail how you would manage an incident within your departments. This will help you identify key people to support you in undertaking the actions required to return your departments services back to BAU.

This structure should remain the same for **ANY** disruptive event regardless of the situation.



6.0 Activation and Escalation

The activation document below should be completed and sent to Emergency Planning whenever your Business Continuity Plan is invoked. EPRR@wiltshire.gov.uk

This will allow EPRR to identify any support required and any impacts this disruption may have on other departments within the Council.

		Business Continuity Activation			Report:	1	Of	1
					Date:			
					Time:			
Incident								
1. Service Information								
Executive Director:								
Director:								
Service Name:								
2. Service Level Impacts								
Percentage of staff available:								
Situation Overview:								
3. Service Status								
Red	<input type="checkbox"/>	Amber	<input type="checkbox"/>	Green	<input type="checkbox"/>			
<i>Critical roles are currently not able to be covered</i>	<i>Staff have been moved to cover critical roles and there is some impact on non-critical areas</i>		<i>Limited or no impact</i>					
Comments	<i>Provide details of the red / amber impacts here.</i> <i>Include details of any mitigating actions taken or outstanding actions to be taken</i>							
4. Additional Information								
Issues Identified	<i>Details of any issues identified</i>							
Horizon Scanning	<i>Details of any potential future issues</i>							
Requests	<i>List any specific requests to the Council Incident Room e.g. Office Space / Fuel</i>							
5. Completed By								
Name:								
Contact Number:								
Email:								

6.1 Action Card

This card provides a guide of the actions you should consider when you enact your Business Continuity Plan.

BC Plan Activation Action Card (generic)	
Role	Responsibilities
<p>Head of Service Coordinate the response to, and, recovery of your service to a business continuity incident.</p>	<p>Maintain overview of your service</p> <ul style="list-style-type: none"> • Provide information about the impact on your service • Think about the (potential) impact on other services and the public, if your service is disrupted.
Advice Available from	Information Required
<ul style="list-style-type: none"> • Emergency Planning • Directors • Your Staff 	<ul style="list-style-type: none"> • Impacts on your service delivery (particularly Priority 1 functions) • Confirm the staffing levels available • Will the incident disrupt other Council Services?
Actions to Consider within the Role	
<ul style="list-style-type: none"> ➤ Activation of your service business continuity plan ➤ Start a log of the incident and record the information on the options available and record actions and decisions, documenting the justification for those decisions. (Appendix A) ➤ Report details of business continuity activation, additional staff and resources to Emergency Planning EPRR@wiltshire.gov.uk ➤ Prioritise services to be recovered ➤ Allocate staff to priority roles and notify all service staff of the disruption, identify additional staff for specific or additional service roles ➤ Consider the financial expenditure during the course of the disruptive event – use the form in Appendix B to log spend if needed. ➤ Consider whether the disruption will lead to regional or national media interest ➤ Contact contractors / partner organisations / Council Services and inform them that you are activating your business continuity procedures ➤ Identify gaps in critical service provision (checking with other Council services and partner organisations to ensure they are still able to deliver services) ➤ Provide mutual aid to other service areas (as required/requested) ➤ Consider messages that are required for the public linking with Comms 	
Plans/Procedures to Consider	Standing Down
<ul style="list-style-type: none"> • Integrated Emergency Management Plan • Service Level Agreements and Procedures 	<ul style="list-style-type: none"> • Notify staff in your service that the business disruption is over • Give a full briefing when handing over

Section 2

Risks and Resources

This section allows you to identify your dependencies within your departments, whether this is staff skills, workplace location, access to fuel etc.

Once identified, this section will allow you to understand the support you may require from other departments within the council to ensure you activities return to normal with as minimal disruption as possible.

7.0 Staff Skills

This table is to identify what easily transferable and in date skills your team has. This will be used to help with movement of staff to priority areas in a prolonged or major incident. We do not require the names and details of staff, just the number who have the below skill sets.

If you are a priority A service, you may not be able to release key staff to assist elsewhere. Only use the table below for staff completing functions that fall under Priority B and C.

Should there be any other specific skills your team have please state these in the bottom section.

Skill/ Qualification	Number of Staff with skillset	Comments
General Skills and Experience		
Delivering Training	3	
Driving (General)	25	
Interviewing Skills	5	
Customer Service Experience	10	
Statistics (Basic Data Analytical Skills)	5	
Minute Taking	5	
Report Writing	5	
Specialist Skills		
GIS Skills	0	
Resilience Direct	0	
My Wilts App (User)	0	
Website Content Editor	2	
DBS Checked	0	
Making Payments/Invoices	2	
Trained Loggist	0	
Driving		
Able to pull a small trailer and trained to do so (BE on driving license)	0	
Able to drive large vehicles and training to do so (C on driving license)	0	
Additional Team Specific Training		
<i>e.g. Chainsaw trained, languages</i>		

8.0 Identifying Risks

8.1 Staffing

Some individual roles within your team require specialist qualifications and suitable experience and knowledge. What measures have you put in place to cover long term absence to prevent disruption to your service.

Role	Skills required for role (qualifications, knowledge, experience)	Contingency / Training Plan
Pension Fund Accountant	Accountancy qualifications	This can be picked up by the senior management team with accountancy experience
Systems Manager	Knowledge of internal Altair system	Improvements to guides and shared knowledge between the Systems Manager and Senior
Investment Manager	Ability to make investment decisions on behalf of the Committee	Can be passed up to the Head of Pensions or external resources with specific LGPS investment knowledge utilised
Employer Funding and Risk Manager	Knowledge of the employer funding and legal obligations of employers	New member of staff to set up policies and procedures and share knowledge within the wider team
Technical Specialist	Technical specialism to be provided by third party	Technical specialism to be provided by outsourcing issues to a third party with specific LGPS legislative knowledge
Payroll Manager	Payroll knowledge	Running payrolls can be picked up by the payroll software provider in case of emergency together with training notes and the knowledge of the Payroll Officer
Communications Manager	Websites and comms specialism	Websites can generally be picked up by a few others in the team with historic knowledge. Specialists in our comms (mailchimp, etc.) can be resourced externally on short term contracts

8.2 Inability to access workplace

Working from home has become a staple of working life. It is imperative that staff are able to carry out their roles to their best ability whether they are in a Wiltshire Council space or at home.

The below resources may help with working from home set-ups that may assist in your contingency plan to mitigate risk.

[Wellbeingresources \(sharepoint.com\)](#)

[#WeAreWilts- Working from home \(sharepoint.com\)](#)

[Flexible working \(sharepoint.com\)](#)

8.3 Loss of IT Programs

It is vitally important that all services understand the importance of IT and technology in their service. **It is down to every individual service to work out what to do during a full or partial disruption to IT services for an indefinite amount of time.**

Not all programs are internally hosted (e.g Altair, PayGate), this means that should they stop working, this is not an internal IT issue and will need to be resolved by the programme supplier.

Regardless of whether your system and/or program is internally or externally hosted **you as a service have the responsibility to plan for the possibility of these going down.** How would you cope without them? You need to consider this.

Please complete the below table for the five outlined programmes (internal and external) plus any extra you use. This data will be shared with IT and is it therefore vital you consider the impacts a loss of IT will have on your service. If you aren't sure whether a program is internally or externally hosted, contact IT.

Please consider that any alternative work around for IT issues will need to consider Information Governance and GDPR regulations and legislation.

Program	Externally or Internally Hosted	Number of Users	Required for Statutory Service	*RTO	Time Critical Periods?	Work around	
						Short Term	Long Term (2+ weeks)
Example: Handle	External	12	No	Between 2 - 7 days	N/A	Nothing – we could live without this for a week	Need to use Paper based records and input into a spreadsheet
Microsoft Teams	Internal	35	Yes	Between 12 - 24 hours	Office hours	Seek to communicate using an alternative platform such as WhatsApp, mobile texting or Outlook (if working)	Establish an alternative platform for all to use – Zoom is a current backup used with other third parties
Outlook	Internal	35	Choose an item.	Between 12 - 24 hours	Office hours	Seek to communicate using an alternative platform such as WhatsApp, mobile texting or Teams (if working)	Establish an alternative email exchange or way to share information noting GDPR limitations
Shared Drives/Network Drives	Internal	35	Choose an item.	More than 1 week	Office hours	We have limited information on shared drives so are able to deal with short time period without access	We have limited information on shared drives so are able to deal with short time period without access
SharePoint	Internal	35	Choose an item.	Between 2 - 7 days	Office hours	The majority of member documentation is held on our Altair administration database. Scheme information, policies and procedures are on SharePoint	Seek to recreate the information gradually but some historic data could mean a halt to certain services
Fixed Line Telephony	Internal	35	Yes	Between 1 - 2 days	Office hours	Seek to communicate using an alternative program, potentially WhatsApp, mobile phones or Outlook (if it is still working) Add a warning to our webpage to ask members to contact us via our online 'contact us' page	Establish an alternative telephone exchange or way to share information noting GDPR limitations
Altair Pensions Administration System	External	35	Yes	Between 12 - 24 hours	Office hours	We have a major problem if we have no access to the Altair administration system, we are unable to operate as a service. There are back up tapes produced	We have a major problem if we have no access to the Altair administration system, we are unable to operate as a service. There are back up tapes produced

						daily and Heywoods have their own disaster recovery plan Work to focus on those cases that are highest priority if we can obtain any data, i.e. forthcoming retirements, etc.	daily and Heywoods have their own disaster recovery plan
Altair i-Connect	External	35	Yes	Between 1 - 2 days	24/7	As our main system for our 190 employers providing us with data the Altair i-Connect system is fundamental to our service. We would have to advise employers to delay providing us with the information	
Altair Member Self Service (MSS)	External	35	Yes	Between 1 - 2 days	24/7	We are becoming more and more reliant on our self-service offering. Without this we would struggle to keep on top of our daily processing so would have to prioritise the manual administration of high priority cases only during the recovery time	Potential requirement to obtain agency staff to cover the additional administration work. Focus on high priority cases only. This would leave a 'backlog' that would then need addressing in the long term
SAP Payroll	Internal	35	Yes	Between 12 - 24 hours	24/7	Wiltshire Council Payroll pay approximately 19000 pensioners and dependants on 25 th of each month	
Altair Payroll	External	35	Yes	Between 12 - 24 hours	Office hours	As a system for paying pensioners we are reliant on this working every month. IN the event of an emergency a repeat payment would of last month's payroll file would be pushed through the BACS bureau but this does have ongoing risk attached.	Depending on the time of the month, i.e. proximity to the payroll payment date, the same work around would be needed as the short term. A BACS file is saved each month on a USB drive for us to make a repeat payment in the event of an emergency.

							Real long term issues would need a tender and migration of payroll to a separate provider.
BACS Bureau	External	35	Yes	Between 12 - 24 hours	Office hours	Needed to pay our pensions and all adhoc payments. As the Council use the same BACS bureau we would potentially follow the same response	Review of other BACS Bureaus to make payments
Altair (Mortality)	External	35	Yes	Between 1 - 2 days	Office hours	Not being advised of deaths in a timely manner could result in more significant overpayments. This may involve additional resource to reclaim the overpayments but only a small issue	We do have the tell-us-once service and could rely on that for a short term
<i>*RTO – Recovery Time Objective - The amount of time you can live without this operating before it causes intolerable consequences (financial, reputation, welfare etc)</i>							

9.0 Adverse Weather (Flood, Wind, Heat, Cold, Snow)

This section should demonstrate what your service does in the event of adverse weather.

Action	Does your service have a role in this?	Details
Are you proactive with weather advice to any vulnerable groups?	No	
Does your service provide any additional functions when hot weather is expected?	No	
Does the official 'Heatwave' warning make a difference to your ways of working?	No	
What does your service do for the public when adverse weather is predicted?	No	
Are you proactive with cold weather advice to any vulnerable groups?	No	
Do you support homeless people with accommodation? Or any similar roles?	No	
Do you fill grit bins, salt roads/pavements, protect any infrastructure from the cold?	No	
What does your service do for the public when flooding is predicted?	No	
Do you have plans for staff when severe heat is predicted?	No	Usual wellbeing protocols
Do you reinforce any comms for severe weather (especially if staff work outside)?	No	
For snow – Do you advise not to come into the office unless it's necessary (assess the risk)?	Yes	Home-based working now but any in-person meetings to be held over Teams
What Council and private vehicles does your service use? Are they prepared for winter weather?	No	

Appendix A - Incident Event Log

Incident:

Log Started (Date and Time):

Log Started by:

Date and Time	Event / Issue / Request / Decision /	Action / Notes / Reason	Staff Initials

Appendix B - Finance arrangements

Heads of Service should collate details of all spending that is incurred during the incident and liaise with finance following the incident.

Details of Expenditure	Value (£)	Purchased By (Full Name)	Receipt (Yes/No)	Item Received (Yes/No)	Paid (Yes/No)

Appendix C - Contacts List - redacted

Document History and Version Control

Version	Date	Comments	Reviewer
1.0	05/01/2023	Initial Issue	EPRR – RI & MM
1.1	15/03/2023	Updates for WPF	MB
1.2	28/08/2024	Updated for 2024	MB

Wiltshire Pension Fund

Cyber Security Policy

Introduction

This document is the Cyber Security Policy of the Wiltshire Pension Fund ("the Fund"), part of the Local Government Pension Scheme ("LGPS"). It is recognised that cyber risk is a real and growing threat, and the aim of this policy is to set out how the Fund intends to assess and manage cyber risk.

Scope

This Cyber Security Policy applies to the Fund. The Fund is managed and administered by Wiltshire Council ("the Administering Authority") and whilst recognising that the Administering Authority uses its own services for ICT, it remains the responsibility of the Fund to assess the cyber security arrangements of both the internal arrangements and external arrangements.

Aims and objectives

In relation to cyber security, the Fund aims to ensure that:

- cyber risk management and cyber governance are integrated into the overall risk management approach of the Fund to reduce any potential loss, disruption or damage to scheme members, scheme employers or the Fund's data and/or assets.
- all those involved in the management of the Fund understand cyber risk and their responsibilities in helping to manage it.
- all data and asset flows relating to the Fund are identified and evaluated on a regular basis to identify the potential magnitude of cyber risk.
- there is sufficient engagement with advisers, providers, and partner organisations, including the Administering Authority, so that the Fund's expectations in relation to the management of cyber risk and cyber governance are clearly understood and assurance is gained on how those organisations are managing those risks.
- an incident response plan is maintained, and regularly tested, to ensure any incidents are dealt with promptly and appropriately with the necessary resources and expertise available.

Legislation and Guidance

The Fund is required to comply with the provisions of the Public Service Pensions Act 2013 and Pensions Act 2004 in relation to the establishment and operation of adequate internal controls to ensure the scheme is managed in accordance with the legal requirements. This includes data protection legislation which is particularly relevant in relation to the management of cyber risk.

Statement of Cyber Risk

The Fund holds and has responsibility for a large amount of personal data and financial assets which makes the Fund a potential target for cyber criminals. Some of the working of the Fund is outsourced to third party providers or provided by partner organisations. As a result, the Fund recognises that a substantial part of managing their cyber risk therefore means managing the cyber risk of these organisations. As well as deliberate cyber-attacks the Fund acknowledges that it is also exposed to accidental damage from cyber threats.

At a high level, the cyber risk to be concerned about is anything that damages the Fund, their members, or their employers because of the failure of IT systems and processes, including those of their providers and partner organisations. In practice, attention is focussed on several key areas:

- Theft or loss of member personal data
- Theft or loss of financial assets
- Loss of access to critical systems (e.g. the administration system)
- Reputational impact on the Fund, the Administering Authority, and employers
- Impact on members (e.g. the service members receive)

The Fund also recognises that, in addition to the direct effect of a cyber attack, there will be indirect effects such as the cost of rectifying any theft or loss of data or assets, meeting any regulatory fines or other financial settlement.

The Fund is aware that Information Security goes hand in hand with cyber security and as such the fund should take meaningful steps in protecting data held in other forms, such as in cabinets, paper form, SD cards etc.

This strategy sets out the Fund's approach to cyber governance. It includes how it intends to assess and minimise the risk of a cyber incident occurring as well as how they plan to recover should a cyber incident take place.

The Fund has researched the possibility of attaining cyber insurance to cover losses relating to damage to, or loss of information from, IT systems and networks but understands that the complexity around the requirements we would need in place, including those of our providers and partner organisations, means that obtaining such insurance would not be available.

Cyber Governance

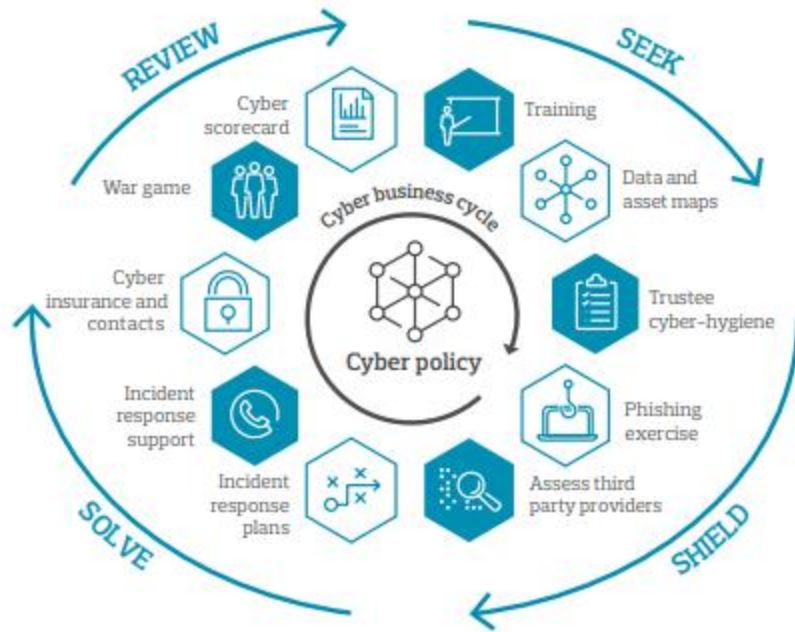
The Fund's approach to cyber governance is to follow the Seek, Shield, Solve and Review framework as summarised below:

Seek – understand and quantify the risk.

Shield – protect the Funds and their critical assets.

Solve – be able to react and recover quickly.

Review – check the effectiveness of their approach to cyber resilience.



The Fund's approaches in each of these areas is set out below:

Seek

Raise awareness, undertake training and assessment

Training:

- Pension Committee, Pension Board members and Fund Officers will receive regular training on cyber risk.
- The training may cover general cyber risk issues or explore a specific area of cyber risk.

Assessing Cyber Risk:

- The Fund will maintain a Data Map (an overview of where the Fund's data is held e.g. membership data and on what systems, for example with external managers, the Fund Actuary, etc.) that together document how the Fund's data flows between all the various stakeholders, advisers, providers, and partner organisations. This also categorises the frequency and materiality of these flows.
- This mapping supports a focused and proportionate approach to managing the risk of the data and asset flows with each stakeholder and external organisation.
- The Fund will undertake a high-level review of the Data Map every year, and as and when there is a change in supplier, or partner organisation. A more detailed review of the Data Map will be undertaken every three years.
- The Fund will seek regular assurance from the Administering Authority, in this instance acting as the ICT sponsor for a large part of the Fund's data (and from the key third party providers) that they assess and regularly review their attack surface to minimise the range of potential risks.
- The Fund will seek regular assurance from the Administering Authority (and from the key third party providers) that they regularly monitor any new threats which emerge and request that they advise the Fund when such threats are identified, including any steps to remedy these.

Risk Register

- Cyber risks are documented in the Fund's risk register, which is maintained by Fund Officers and updated on a quarterly basis. This information is considered as a regular item at Pension Committee and Pension Board meetings.

Shield

Set roles and responsibilities:

Responsible Officers

The Scheme Manager is the designated individuals for ensuring the cyber resilience framework outlined in this Policy is carried out for the Fund and ensuring they are satisfied with how cyber risk is being managed. The Scheme Manager is the Administering Authority and the responsibility has been delegated to the section 151 officer.

Oversight

The Pension Committee and Pension Board assists in ensuring the Fund meets its responsibilities and therefore will have oversight of this Policy.

Officers, advisers, providers, and partners

It is the responsibility of all Fund Officers to comply with this Policy. Fund providers and partner organisations will be made aware of this Policy and should provide regular reports on cyber risks and incidents.

Expectations of Pension Committee and Pension Board members and Fund Officers

Cyber Hygiene

Pension Committee and Pension Board members and Fund Officers are responsible for managing their own cyber risk and are encouraged to follow best practice in areas such as home working, use of personal email, password management and use of public networks.

Pension Committee and Pension Board members and Fund Officers are required to attend annual cyber security awareness training.

Pension Committee and Pension Board members and Fund Officers are required to confirm their adherence to this Policy on an annual basis and highlight any areas where adherence is not possible so that a secure alternative can be found.

Assessing advisers, providers, and partner organisations

The Fund will assess all advisers, providers and partner organisations identified by its Data Map to ensure they have appropriate arrangements in place to protect themselves against cyber threats, taking appropriate specialist advice as required. This will include assessing the Council as host for IT systems and services.

The Fund will take a proportionate approach to assessing each organisation depending on the level of risk they pose to the Fund (as highlighted by the Data Map), with those advisers, providers or partner organisations that pose the greatest risk being assessed first and with more scrutiny.

The Fund will require regular reports from its advisers, providers and partner organisations on cyber risks and incidents.

The Fund will determine how regularly and to what extent further reviews are required, with those organisations that pose the greatest risk being reviewed more regularly.

Solve

Incident response planning

Incident response plan

The Fund's incident response plan will be developed in conjunction with our key advisers and providers, the Administration Authority, and cyber experts.

The Fund will inform all providers, advisers, and partner organisations of who needs to be notified when reporting a cyber incident.

Incident response support

The Administration Authority has cyber expertise to provide incident response support, including in relation to the Fund in the event of a cyber incident.

The Fund has agreed with the Administration Authority that in the event of a cyber incident affecting the Fund, they would also be supported by resources from the Council's ICT team to provide incident response support.

Incidents should be reported through the Administration Authority's [Information Security and Cyber Security \(sharepoint.com\)](#) site using the 'Report an Incident' facility.

Financial impact and insurance

The Fund will, from time to time, assess the possible financial impact of a cyber incident on the Fund recognising that in practice the impact is highly variable depending on the nature of the attack.

Review

Review of elements relating to this policy

As highlighted throughout, the approaches to managing cyber risk as outlined in this Policy will be reviewed on a regular basis, including thorough regular testing of the incident response plan, regular review of the Data Map, and regular assessments of providers and partner organisations cyber resilience.

Review of this policy

This version of the Cyber Strategy was reviewed and agreed by the Pension Committee and Pension Board on XXX. It will be formally reviewed, at least every three years or earlier if our approach to assessing and managing cyber risk merits reconsideration.

Wiltshire Council Administrator of Wiltshire Pension Fund

Wiltshire Pension Fund is administered by Wiltshire Council, as such Wiltshire Council have their own policies and procedures on cyber security and information security in which Wiltshire Pension Fund must abide by.

All staff have the responsibility to keep information safe and must follow the 3 principles of information security:

- Confidentiality – Only authorised personnel have access to the information. Protections in place 2FA, passwords, encryption, authentication, and defence on cyber security.
- Integrity – Information we have has to be accurate and used for the purpose it is intended for. Must not be altered accidentally or maliciously.
- Availability – Information is accessible when needed by those who have the permissions to access such information.

More information on this [Information Security and Cyber Security \(sharepoint.com\)](#) and how staff can play their part: [Play your part - and help to keep our information safe \(sharepoint.com\)](#).

All staff must undergo yearly internal training in the following areas:

- Data protection
- Freedom of Information
- Records Management
- Information Security

Wiltshire Council policies can be found: [Information Governance Policies and Templates \(sharepoint.com\)](#)

References:

[Pensions-Cyber-Risk.aspx \(aon.com\)](#)

[Information Security and Cyber Security \(sharepoint.com\)](#)

[Play your part - and help to keep our information safe \(sharepoint.com\)](#)

[Information Governance Policies and Templates \(sharepoint.com\)](#)

Wiltshire Pension Fund Data Map

Data source and name of provider or partner organisation	Externally or Internally Hosted	Data held	Method to transfer or access data	Format of data	Risk assessment (RAG) and commentary of risk	Arrangements (proportionate) in place to protect against cyber threats
Altair (Administration System), Heywood	Externally Hosted	Personal, Financial	Secure hosted platform with MFA login	Electronic	MEDIUM Significant data held but proven secure system	
Altair (Payroll System), Heywood	Externally Hosted	Personal, Financial	Secure hosted platform with MFA login	Electronic	MEDIUM Significant data held but proven secure system	
Bacs Bureau, Paygate	Externally Hosted	Personal, Financial	Login and password	Electronic	MEDIUM Smaller amount of data held but linked to Fund bank account	
Docmail (document postal service), CFH	Externally Hosted	Personal, Financial	Login and password	Paper and Electronic	MEDIUM Access to system is less secure but data fully encrypted prior to posting	
My Wiltshire Pension portal, Heywood	Externally Hosted	Personal, Financial	Login, password and security questions	Electronic	HIGH Self service portal with higher potential of a cyber-attack. New "TME" version will have MFA login to improve access to data	
Main Wiltshire Website, GOSS	Hosted by Wiltshire Council	None	Login and password		LOW No data held but ability for members to provide information via online forms	

					Possibility of cyber-attack	
i-Connect, Heywood	Externally Hosted	Personal, Financial	Employers are provided with a login and password	Electronic	MEDIUM Access to system is less secure and significant amount of data passes through. However, more secure than employers passing spreadsheets via email	
Brunel Instruction Platform	Externally Hosted	Financial	Secure hosted platform with MFA login	Electronic	MEDIUM Significant risk to financial fraud but proven method of securing system	
StateStreet	Externally Hosted	Financial		Electronic	MEDIUM Higher risk as ability to trade	
Partners Group	Externally Hosted	Financial		Electronic	LOW Reporting only so no ability to fraudulently trade	
BlackRock	Externally Hosted	Financial		Electronic	MEDIUM Higher risk as ability to trade	
World Fund	Externally Hosted	Financial		Electronic	LOW Reporting only so no ability to fraudulently trade	
Grant Thornton (Auditors)	Externally Hosted	Personal, Financial		Electronic		
Deloitte (Auditors)	Externally Hosted	Personal, Financial		Electronic		
HMRC	Externally Hosted	Personal, Financial		Electronic	LOW Reporting only and no alternative available	
Office for National Statistics (ONS)	Externally Hosted	Personal, Financial		Electronic	LOW Reporting only and no alternative available	
Hymans (Actuary)	Externally Hosted	Personal, Financial		Electronic		

DocuSign	Externally Hosted	None	Login and password		LOW No data held but ability to forge signatures	
Microsoft Teams	Hosted by Wiltshire Council		Secure via WC network. Higher opportunity for fraudsters to access through phishing attacks	Electronic	LOW Generally, there is no data shared through Teams Internal access only so reliant on WC to manage attacks	
Outlook	Hosted by Wiltshire Council		Secure via WC network. Higher opportunity for fraudsters to access through phishing attacks	Electronic	MEDIUM Minimal data but most likely way for targeted attacks to occur. Regular training required for teams to ensure we know who we are providing data to and the use of password protected and encrypting files	
Shared Drives/Network Drives	Hosted by Wiltshire Council		Internal access only	Electronic	LOW Internal access only so reliant on WC to manage attacks. All external shared drives to go through information governance	
SharePoint	Hosted by Wiltshire Council		Internal access only	Electronic	LOW Internal access only so reliant on WC to manage attacks. All external shared drives to go through information governance	
SharePoint (Brunel-External)	Hosted by Wiltshire Council	Financial	MFA login	Electronic	LOW Sharepoint site for Brunel investment reports – Wiltshire specific area and all Clients area	

					Potential financial risk but minimal use of information	
Post, Royal Mail				Paper	LOW Received through WC postal system. Possibility of post being stolen and/or not disposed of securely – regular training to be given to staff.	
LinkedIn	Externally Hosted	No data	Login and password	Electronic	LOW Minimal data held but ability for Cyber-attack to create reputational damage.	
Mailchimp	Externally Hosted	Personal, Financial	Login and password	Electronic	MEDIUM Minimal data held but ability for Cyber-attack to create significant reputational damage with majority of members emails being held and access to issue bulk emails.	

WILTSHIRE COUNCIL

WILTSHIRE PENSION FUND COMMITTEE
12 December 2024

Risk Management Review

Purpose of the Report

1. To update the Committee on progress regarding the review of the Fund's risk management framework, and to seek approval for some proposals regarding risk appetite and scoring of the impact of risks.

Background

2. Following the introduction of Wiltshire Council's new corporate risk management system, SWAP recommended that the Pension Fund align with this new framework as part of the key controls audit in June 2024.
3. At the Committee meeting on 11 July 2024, members approved the following actions as a way forward:
 - To review in detail the Council's new risk management framework and develop a plan to embed these in the Fund's current operational risk register over the next 12 months.
 - To recommend that Corporate-level risks relating to the Pension Fund regarding funding risk and reputational risk should be included on the Council's risk register.
 - To incorporate SWAP's audit recommendations into the Fund's risk register
 - To work with the Council's risk management specialist to ensure that both the Council and Pension Fund are satisfied that the arrangements are compliant and effective for both parties.
4. This report provides a progress update, details some issues that have identified as part of the process of updating the Fund's risk management framework, and proposes some solutions for the Committee's approval.

Considerations for the Committee

Progress against the recommendations which were agreed in July 2024

5. Progress against the recommendations is detailed in the following table:

Recommendation	Progress update
To review in detail the Council's new risk management framework and develop a plan to embed these in the Fund's current operational risk register over the next 12 months.	This has been done. The Council's framework has been reviewed, and a new version of the Pension Fund's risk register has been prepared. This has been kept as close as possible to the original version for ease of use and simplicity, but additional columns have been added to incorporate the additional components. If the changes proposed today are approved, the policy will be drafted and brought to the Committee in

Recommendation	Progress update
	advance of the 12-month deadline for completing this piece of work.
To recommend that Corporate-level risks relating to the Pension Fund regarding funding risk and reputational risk should be included on the Council's risk register.	This has been done, and discussed, reviewed and approved by the s151 officer.
To incorporate SWAP's audit recommendations into the Fund's risk register.	See the table below.
To work with the Council's risk management specialist to ensure that both the Council and Pension Fund are satisfied that the arrangements are compliant and effective for both parties.	Excellent progress has been made here. The Council's risk management specialist has delivered a training session for the Pension Fund risk owners. Once the final changes are made to the Pension Fund's risk management framework, a final review will take place.

SWAP recommendations and progress

6. SWAP's observations regarding risk management in June 2024 identified several gaps which needed to be actioned. These are shown in the following table, along with progress updates:

SWAP observation	Progress update
No documented risk management policy in place	This will be done once all other amendments have been made and will be brought to the Committee for approval early next year. It is not possible to directly adopt the Council's policy due to the different lines of oversight and accountability, but the WPF policy will be consistent with the Council policy.
No guidance for officers on risk wording	We have adopted the Council's guidance in this area. The team have all received training from the Council's risk specialist on this topic. All risks are now worded in the format of "cause, event and effect".
No set risk appetite	We have adopted the Council's risk categories and appetite scores and mapped these to the Pension Fund's risk letters. The results of this exercise are provided later in this paper for the Committee's review and approval.
Dates missing from the risk register to identify when a risk was added, reviewed or updated	This was not a fair finding, as the risk register is saved every month to preserve the history and evidence of when risks are added, reviewed or updated. In the interests of maintaining the Pension Fund's risk register at a manageable size, no further action is proposed.
No recording of inherent risk on the risk register	We have adopted the Council's guidance in this area. The team have all received

SWAP observation	Progress update
	training from the Council's risk specialist on this topic. All risks are now scored using a 5x5 matrix, with scores recorded for original, target and current risk.

Adopting the Council's framework – challenges and solutions

7. As an important reminder, the Pension Fund is aligning with all the features of the Council's risk management framework, such setting risk appetite, scores for original, target and current risk, using a 5x5 scoring matrix, and wording risks in line with the Council guidance (cause, event, effect). However, due to some very key differences in the way the Pension Fund is governed, and the fact that an established risk register which managers were very actively engaged with already existed, the Council's risk register template has not been adopted, but instead adjustments to the existing operational Pension Fund risk register have been made to ensure alignment with the Council's framework.
8. This has enabled the following important features of the Fund's risk register to be maintained whilst achieving compliance with the Council's framework:
 - Mapping of each risk to a Pension Fund Strategic Vision Goal, as set out in the Pension Fund's Business Plan. This is more detailed and relevant than mapping to the Council's business plan, where everything would need to be mapped to "healthy organisation".
 - Maintaining the valuable feature where risks and controls are mapped together, something that is reviewed every month by the Fund's risk owners to ensure that important controls were being carried out and evidenced.
 - Mapping of each risk to a "letter", each of which refers to a risk area (such as "investment", "service delivery", "funding", "projects" etc etc), which enables risk to be assessed by area and aggregated up for Committee reporting.
9. One of the aspects of re-scoring all the risks using the 5x5 system that proved to be challenging was scoring impact. Likelihood was simple to score using the Council's framework, but the impact framework was not applicable to the Pension Fund. The Council's impact framework is included in Appendix 1 for reference. This refers to impact on the budgets of the "service", "directorate" and "council". This is not applicable for the Pension Fund due to it being financially separate, so an overspend on the Pension Fund's budget would never have implications for the directorate or council. Officers have therefore developed an impact framework which is Pension Fund specific. This is included in Appendix 2, and it is recommended that the Committee review and approve this framework for use in the Pension Fund's risk register.
10. Another aspect of the new framework is the inclusion of risk appetite. Under the Council's framework, risks are assigned two risk categories, and the risk appetite for the risk will be the lower of the appetite scores. Rather than assign risk appetite for every single risk, officers have taken the approach that risk appetite should be assigned to each risk area for the fund (mapped to a letter, as described in the last bullet point in paragraph 9 above). The risk appetites for the different risk areas of the Pension Fund are shown in Appendix 3. It is recommended that the Committee review and approve these risk appetites.

Recommended next steps

11. Officers' recommendations are:

- a) To note the progress made so far and endorse the approach taken as outlined in paras 8 to 10.
- b) To approve the adoption of a Pension Fund specific impact framework as set out in Appendix 2.
- c) To approve the methodology for applying risk appetite to risk areas, and the resulting risk appetite scores as set out in Appendix 3.

Environmental Impact of the Proposal

12. Not applicable.

Financial Considerations & Risk Assessment

13. There are no specific financial and risk assessments resulting from this report.

Legal Implications

14. There are no material legal implications from this report.

Safeguarding Considerations/Public Health Implications/Equalities Impact

15. There are no known implications at this time.

Proposal

16. The Committee is asked to approve the recommendations in paragraph 12.

Jennifer Devine
Head of Wiltshire Pension Fund

Report Author: Jennifer Devine, Head of Wiltshire Pension Fund

Appendix 1 – Council’s impact framework

Impact Score	Selected Example Indicators
<p>1 Negligible</p>	<ul style="list-style-type: none"> • Brief service disruption for less than a day affecting a project or team. • Incident occurred but no time lost. • Legal action against the Council unlikely. • Possible financial impact manageable within service budget. • Limited systems downtime with some services unavailable for a few hours.
<p>2 Moderate</p>	<ul style="list-style-type: none"> • Loss of service for 1-2 days affecting one or more services. • Slight injury to one or more people but no time lost. • Legal action against the Council possible. • Financial impact managing within existing Service budget. • Brief downtime of non-critical systems for 1-2 days.
<p>3 Substantial</p>	<ul style="list-style-type: none"> • Loss of service for 2-3 days affecting a single directorate. • Temporary injury to one or more people requiring limited time off work. • Legal action against the Council likely. • Financial impact manageable within existing Directorate budget. • Downtime of core systems for 2-3 days.
<p>4 Critical</p>	<ul style="list-style-type: none"> • Loss of service for 3-5 days affecting most directorates. • Severe injury to one or more people requiring sustained time off work over 3 months. • Legal action against the Council expected. • Financial impact manageable within existing Council budget. • System failure with critical systems unavailable for 3-5 days.
<p>5 Catastrophic</p>	<ul style="list-style-type: none"> • Loss of service for more than 5 days affecting the whole council. • Death or life-changing injuries to one or more people. • Legal action against the Council underway or almost certain.
	<ul style="list-style-type: none"> • Financial impact not manageable within existing funds. • Significant system failures with critical services unavailable for more than 5 days.

Appendix 2 – Proposed WPF impact framework

Impact Assessment	Impact Score	Fund Budget	Members / Employers	Investment & Funding	Reputation (fraud, governance, reporting)
Negligible	1	Negligible Financial impact manageable within existing funds with variance against forecast <2.5%	Impacts less 1% of members/employers Impact on an member/employer is unlikely.	The event would have minimal impact on the value of the funds total investments <0.2%. It would make a negligible change to the ongoing funding level <2%. It would have minimal adverse impact on the funds ability to meet its Responsible Investment priorities.	<ul style="list-style-type: none"> Minimal or no impact on public perception or stakeholder confidence. Isolated and easily rectifiable incident with no media attention or external audit issues. No breach of governance standards.
Moderate	2	Moderate Financial impact manageable within existing funds with variance against forecast 2.5-5%	Impacts less than 2.5% of members/employer Impact on an employer/member is possible i.e. contribution rate or funding level impacted	The event would have moderate impact on the value of the funds total investments <0.5%. It would make a moderate change to the ongoing funding level <5%. It would have some adverse impact on the funds ability to meet its Responsible Investment priorities.	<ul style="list-style-type: none"> Minor negative impact on reputation, limited to a small group of stakeholders, generating some informal complaints. Localised concern that may require additional internal controls but no external intervention. Minor non-compliance with governance standards, requiring simple corrective action.
Substantial	3	substantial Financial impact manageable within existing funds with variance against forecast 5-10%	Impacts less than 5% of members/employers Impact on an employer/s/member/s is likely i.e. contribution rate or funding level impacted	The event would have substantial impact on the value of the funds total investments <1.0%. It would make a substantial change to the ongoing funding level <10%. It would have substantial adverse impact on the funds ability to meet its Responsible Investment priorities.	<ul style="list-style-type: none"> Noticeable negative impact on reputation, raising concerns among key stakeholders and noticeable increase in informal complaints. Sustained regional media coverage or heightened scrutiny from regulatory bodies. Significant non-compliance with governance or reporting standards, requiring detailed remediation plans.

Critical	4	Critical Financial impact not manageable within existing funds with variance against forecast 10-20%	Impacts less than 10% of members/employers Impact on an employer/s/member/s is expected and will impact more than one employer i.e. contribution rate or funding level impacted	The event would have substantial impact on the value of the funds total investments <2.0%. It would make a critical change to the ongoing funding level <20%. It would have critical adverse impact on the funds ability to meet most its Responsible Investment priorities.	<ul style="list-style-type: none"> • Severe damage to reputation with potential for national media coverage. • Loss of confidence among a significant portion of stakeholders, including members and/or employers, with formal complaints received/escalated to external body. • Serious fraud or governance breach requiring immediate and extensive action to address.
Catastrophic	5	Catastrophic Financial impact not manageable within existing funds with variance against forecast >20%	Impacts over 10% of members/employers Catastrophic Employer impact including widespread contribution increases to the majority of employers.	The event would have substantial impact on the value of the funds total investments >3.0%. It would make a catastrophic change to the ongoing funding level >20%. It would prevent the fund being able to meet any of its Responsible Investment priorities.	<ul style="list-style-type: none"> • Irreparable reputational harm with international media coverage. • Loss of trust in the fund, leading to long-term damage to stakeholder relationships. • Systemic governance or fraud failure, potentially resulting in legal action, fines, or regulatory intervention.

Appendix 3 – Proposed risk appetite scores

The Council's risk categories:

New risk categories

Category	Appetite level	Appetite score
Environment	Cautious	8
Financial	Receptive	12
Governance	Cautious	9
Health and Safety	Minimalist	6
Information	Cautious	9
Legal	Cautious	9
Operations – Minimalist	Minimalist	6

Category	Appetite level	Appetite score
Operations – Cautious	Cautious	9
Operations - Open	Receptive	12
Procurement and Commissioning	Receptive	12
Reputational	Cautious	9
Security	Cautious	8
Technology	Receptive	12
Workforce	Cautious	9

The Pension Fund risk areas and appetite scoring (please note some letters are blank, they are spares in case a new risk area is identified in the future):

Letter	Risk Category	Appetite 1	Appetite 2	Appetite Score1	App Score 2	Total
A						
B	Compliance with regulations	Operations - minimalist	Legal	6	9	6
C	Performance	Operations - minimalist	Reputation	6	9	6
D	Systems management	Technology	Security	12	8	8
E	Climate risk	Financial	Operations - open	12	12	12
F	Projects	Operations - Cautious	Reputational	9	9	9
G	Funding	Financial	Operations - open	12	12	12
H	Data Management	Information	Operations - minimalist	9	6	6
I	Employer Management	Operations - Cautious	Legal	9	9	9
J	Investment	Financial	Operations - open	12	12	12
K	Service delivery	Operations - minimalist	Reputational	6	9	6
L	Financial management	Financial	Operations - Cautious	12	9	9

Letter	Risk Category	Appetite 1	Appetite 2	Appetite Score1	App Score 2	Total
M	Resourcing	Workforce	Operations - Cautious	9	9	9
N						
O						
P	Fund Governance	Governance	Legal	9	9	9
Q	Stakeholder engagement	Reputational	Operations - open	9	12	9
R	Reputational risk	Reputational	Operations - minimalist	9	6	6
S						
T	Other External Risks	Operations - Cautious	Technology	9	12	9

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WILTSHIRE COUNCIL

WILTSHIRE PENSION FUND COMMITTEE
12th December 2024

KEY FINANCIAL CONTROLS REPORT

Purpose of the Report

1. The purpose of this report is to highlight the significant issues in relation to the Fund's key financial controls.

Background

2. The purpose of this report is so that the Committee and Local Pension Board can easily review key areas of financial controls and monitor progress against planned improvements.

Key Considerations for the Committee / Risk Assessment / Financial Implications

Accounts and Annual Report

3. Final sign off for the full Wiltshire Council Accounts for 2019/20 has now been completed, after finalising the Council accounts Deloitte raised new issues on the pension fund accounts. Officers responded to these new questions and have provided amended financial statements and annual report. Minor changes were made to explanatory notes, no financial figures have changed. The signed annual report and accounts have been published on the funds website.
4. Sign off for the accounts on periods ending 2020/21 and 2021/22, 2022/23 continues to be delayed, the Pension fund accounts form a part of the full Council accounts and the delay, which is due to an issue within the Wiltshire Council figures, has meant the pension fund accounts have not received their final audit opinion. Audit sampling and review had been undertaken and all questions on the pension fund accounts had been responded to at the time. The Government have set a deadline of 13th December for all outstanding local government accounts up to 2022/23 to be published. Given constraints on resource and time it is expected Deloitte will be unable to provide an audit opinion on these outstanding accounts, leading to a disclaimer which would apply to the pension fund accounts. This would bring the matter to a conclusion, with focus being on the 2023/24 accounts. At the point of writing this paper this is still our understanding, I am waiting on a further response from the auditors on this matter.
5. Unaudited accounts and annual report for 2023/24 have been published, audit testing by Grant Thornton is well progressed with final samples and testing being undertaken. This has taken longer this year because the assessed higher audit risk due to implementation of new financial system during year, first time auditing the council and council not having previous financial year reports signed off. This lowered the materiality threshold and created a higher burden of testing and sampling. The in-depth review identified some amendments which will be required to the statements of accounts. The anticipated disclaimer opinion for the previous accounts will impact the opinion that can be given on the 2023/24 accounts. The new auditors will be unable to place reliance on the opening balances, leading to a qualification of the accounts in this area. This qualification would be present for a number of years until the accounts no longer contain figures from 2023/24, such as in the prior year comparatives.

Quarterly Financial Performance Dashboard

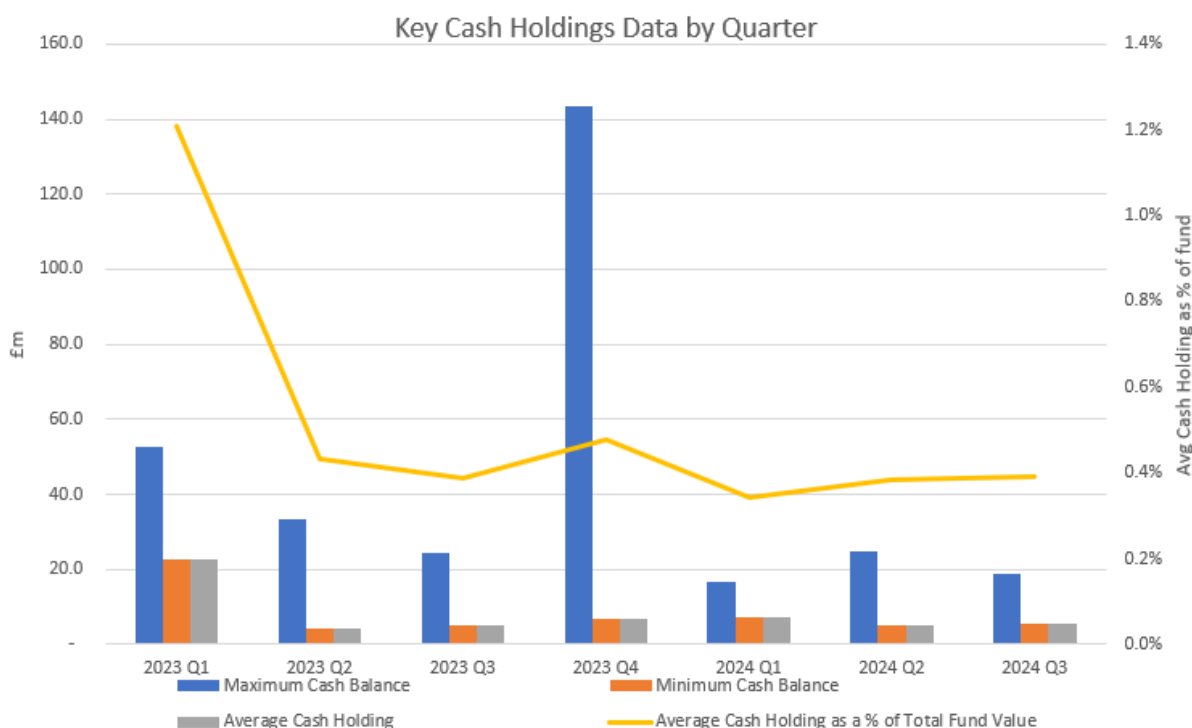
Wiltshire Pension Fund - Key Financial Controls Dashboard				
Control Area	RAG	Items reviewed under this control area	Comments on Performance	Ongoing Actions
	Nov			
1. Employer Contributions	Green	Timely and accurate payment of employer contributions each month.	See summary performance table for full details. Almost all employers paying on time and with the correct rate.	Employer contribution monitoring meeting
2. Cashflow, banking and capital calls	Green	Maximum and minimum cash balances, private markets capital calls and distributions and treasury performance.	See summary performance table for full details.	Weekly cashflow reconciliation and further development of weekly monitoring reporting.
3. Balance Sheet Reconciliations	Yellow	All balance sheet control codes are reviewed for accuracy and outstanding issues.	All control codes have been reviewed and checked, no unexplained balances prior to Evolve implementation. Year end balance sheet balances have been reviewed and are all acceptable. New bank reconciliation set up with move to Oracle and moved from corporate finance team to pension accountancy	Refreshing working documents for future work with Oracle system and rolling forwards previous year working papers. Clearing old balances rolled forward from SAP.
4. Altair Checks	Yellow	Check between the ledger and pension admin system (Altair) that any transactions, such as payments or receipts match the admin system.	New integrated payments process removes the need for these checks. New control measures will be designed.	Development of new reporting from Altair for immediate payments currently progressing.
5. Financial Budget Reporting	Red	Review of year to date and forecast operating budget performance, or any unusual monthly movements on the overall fund account.	Issues with the new system have prevented reporting against the budget expenditure. New starters in the finance team will bring capacity to address this issue.	Development of new integrated Budget reporting from Oracle in progress. Period closedown to ensure correct reporting. Intercompany recharges.
No material concerns	Green			
Minor issues	Yellow			
Major issues	Red			

6. The following table provides further details for performance dashboard item 1. Employer contributions. Three very small employers that are recently admitted to the fund remain outstanding on payments and that has been addressed by the team.

Quarter	Payroll Month	Paid contributions £000's				Average late and overdue contributions total days		Number of employers payments status		
		Total Payment	On Time Payment	Late Payment	Late Payment %	Days Late Recd	Days Overdue	On time	Late	Not Received
Q1	Apr-24	8,983	6,528	2,455	37.6%	3.0	-	167	9	-
Q1	May-24	8,958	8,126	832	10.2%	5.6	-	171	7	-
Q1	Jun-24	9,108	8,214	893	10.9%	19.8	-	172	6	-
Q2	Jul-24	9,145	9,119	26	0.3%	11.1	-	170	8	-
Q2	Aug-24	9,203	6,261	2,856	45.6%	10.6	37.0	166	10	2
Q2	Sep-24	9,141	8,154	987	12.1%	13.1	58.7	158	17	3
Total	Q1	27,049	22,868	4,180	18.3%	9.5	-	510	22	-
Total	Q2	27,489	23,534	3,870	16.4%	11.6	31.9	494	35	5

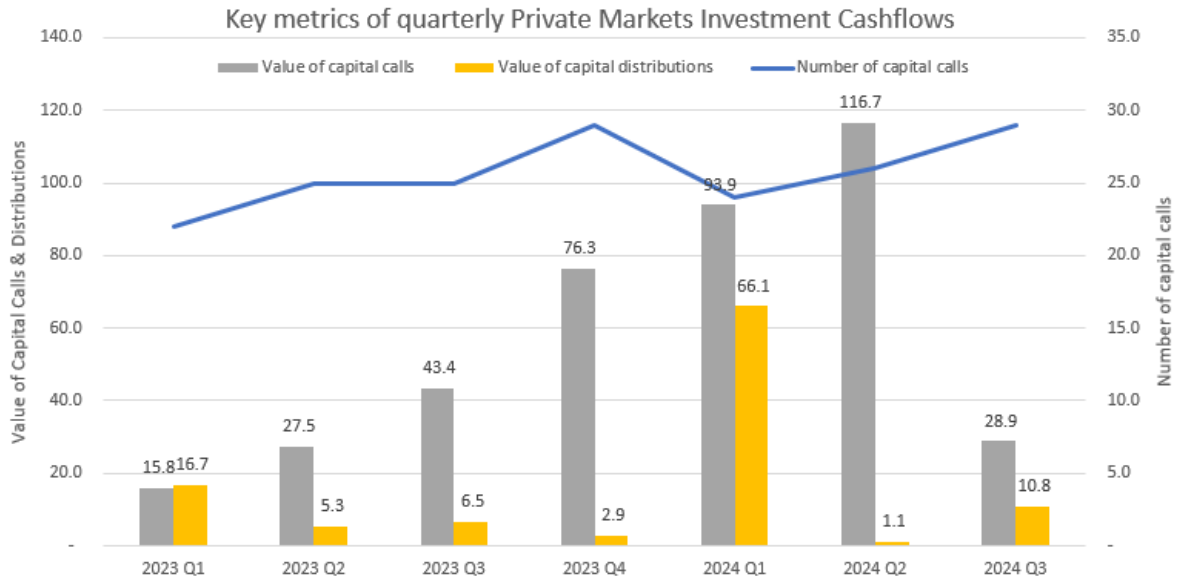
7. The majority of the late payments are received within a few days of the deadline and all employers who have not paid are contacted immediately after the deadline day to remind them to pay. A small number of employers increase the days late received, persistently late payments or employers where we have problems are discussed in the employer data and contributions working group are appropriate actions are agreed relevant to each employer. The payment dates were re-confirmed at the Annual Employer Forum on 27th November 2024 which should encourage employers to pay on the correct date.

8. The following graph provides further details for performance dashboard item 2. Cashflow, banking and capital calls.



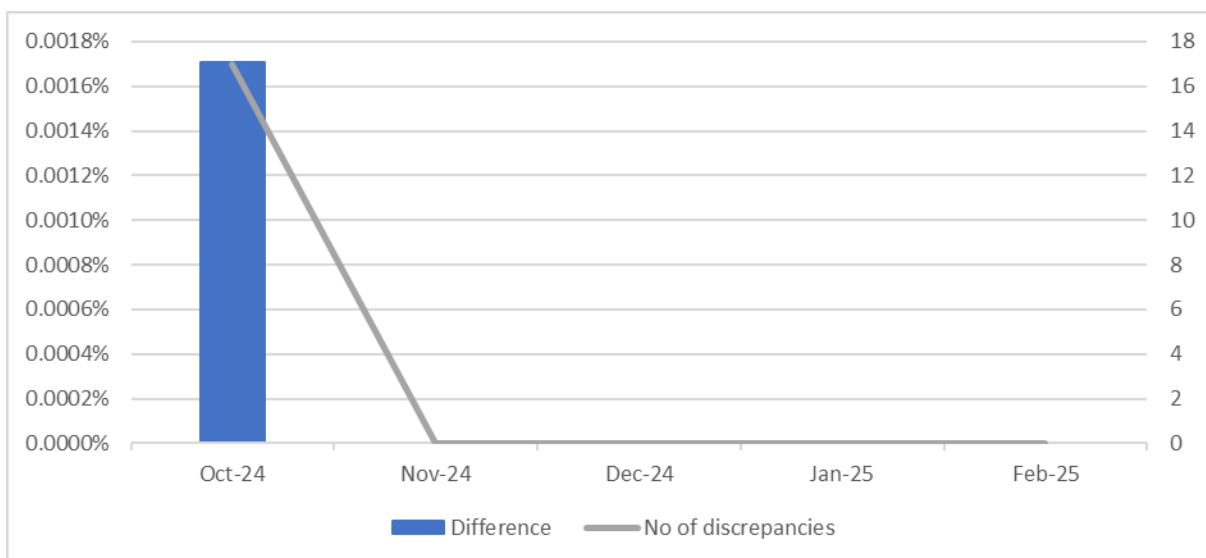
9. Cashflow activity for private markets capital calls have continued to be met as commitments are called. The large investments in Q2 2024 are payments to a new

investment commitment in Clops and to fund our existing commitment to an affordable housing fund.



Payroll reconciliations

10. Following the migration of the payroll from Wiltshire Council to our Integrated Payroll System we perform regular monthly reconciliations to ensure our Altair administration system continues to align following the processing of the pensioner payroll.
11. The reconciliation process to track the variance between the Altair pension admin system and the payroll has been running since the migration in October 2024. The reconciliation compares the annual pension payable on each system and quantifies the number of cases and value of discrepancies. In the first month there were discrepancies identified and these are reviewed by the administration teams.
12. The following graph shows the discrepancies between the two systems as a percentage of the payment being made and the number of records with discrepancies.



Budget reporting issues

13. Following the implementation of the Oracle system the ability to report against the operational fund budget has been disrupted. Invoices to suppliers are being paid and staff are being paid, the issue has been getting the reporting up and running, performing reconciliations etc. Now the accounting team is fully resourced and our understanding of the new evolve system has improved, budget reporting will be re-established.
14. Officers are approving spend in line with how the budget was set and within the staffing establishment that was agreed. However, given the inability to report and accurately forecast there is a risk of an unexpected overspend. There are potential expenditure risks this year, with a new actuary, investment advisor and the payroll implementation project being just a few.
15. We expect to have budget reporting and forecasting available for accounting periods after December 24, Q3, for reporting to the committee. We will also look to expand the reporting included in the KFC report in the new year to cover over areas we report on. This will include reconciliations and controls regarding the now fully operational integrated payroll and immediate payments system, and reporting on other key fund controls around employer contributions and data which are becoming more meaningful with more employers onboarding onto iConnect.

Council Financial Service Issues

16. We have recently been experiencing issues with services provided by the Council finance team. These have covered issues with VAT reclaims, intercompany transfer of costs, Payroll and financial periods closedown. The implementation of Oracle has created problems across all departments and created certain control issues. Officers continue to work with Council finance department to resolve these.
17. The fund has also made limited progress on drafting supporting schedules for the SLA between the council and the pension fund. This will require further work by fund officers and a renewed effort of engagement with the council team.

Environmental Impacts of the Proposals

18. There is no known environmental impact of this report.

Safeguarding Considerations/Public Health Implications/Equalities Impact

19. There are no known implications at this time.

Proposals

20. The Committee is asked to use this report to monitor progress against resolving the issues which have been identified.

Report Author: Chris Moore, Pension Fund Accounting and Investments Team Lead

Unpublished documents relied upon in the production of this report: NONE

Agenda Item 14

Wiltshire Pension Fund Committee - 2024/25									
Meeting:	07/06/24	07/07/24	09/09/24	07/10/24	07/11/24	07/12/24	07/02/25	07/03/25	Guidance comments
GOVERNANCE - Committee Specific	Comments								
Confirmation of annual election of Chair & Vice Chair	✓								Annual appointments made by Full Council
Review Committee's Terms of Reference (if and as required)				✓					This review should be in conjunction with the Board's ToR review and other strategic documents to ensure continuity. Lasted reviewed in July 2020.
Fund's annual budget setting							✓		Prior to 31st March each year
Budget Monitoring		✓		✓		✓		✓	Quarterly spend & allocation of costs review against budget
Budget Outturn		✓							Annual actual review of financial pension fund spend against the previous year's budget
Committee Annual Training Plan Update		✓						✓	To be completed following each Scheme year for subsequent inclusion in the Fund's AR&A
Training Item relevant to agenda	✓	✓	✓	✓	✓	✓	✓	✓	To be consistent with Members training & development strategy 4 year plan last undertaken with the Committee in Nov 2022, due next in 2026. The Committee should also compare itself against its own terms of reference core functions.
Committee effectiveness review									Quarterly review of Committee's work plan. Officers to update the next Scheme year's plan with annual reviews undertaken in calendar Q2
Forward Work Plan Review		✓		✓		✓		✓	
GOVERNANCE - Fund Specific	Comments								
Scheme Legal, Regulatory & Fund updates		✓		✓		✓		✓	Quarterly update by the Head of Pensions
Review of Risk Register		✓		✓		✓		✓	Quarterly review. Request risks to be added & changes made by Board prior to Committee
Updates & comments on the previous Committee & Board meeting minutes	✓	✓	✓	✓	✓	✓	✓	✓	Amongst other purposes Members should use the minutes to identify risks for inclusion in the risk register
Review Governance Compliance Statement				✓					Five year plan last approved on 30/03/2021. To form part of the changes arising from the Good Governance review. The self-assessment to be independently audited in 2025/26. Replaces tPR Code of Practice III
TPR General Code of Practice plan and self-assessment						✓			Complete 4 year training plan last approved on 16/12/2021. Annual reviews undertaken in Q4 each year
Review Fund Training Programme		✓						✓	Annual Report & Accounts to be completed & published by statutory deadline of 1st
Review the Fund's Annual Report & Accounts		✓							Audits include: AR&A's - Published by 1st December, Key Controls, TPR GCOP assessment & Payroll Migration III.
Approve Internal Audit Report scope						✓			Committee to liaise with the Audit Committee concerning the scope of Council's AR&A's and SWAP audits. Ensure audit recommendations are actioned.
Input into and monitor External & Internal Audit Reports		✓		✓		✓		✓	

Treasury Management Strategy					✓				Annual review, including cashflow forecasting and preferred bank account maintenance (Last reviewed 12/02/2023)
Review service providers, both internal & external. Include advisor appointments, processes, controls & SLAs								✓	Committee to receive an annual update from the Board on the effectiveness of the Fund's advisers
Review Actions from previous meetings	✓	✓	✓	✓	✓	✓	✓	✓	Addressed primarily during meeting agenda planning stage
GOVERNANCE - Fund Plans, policies & strategies									Comments
Review Business Plan (To include KPI Improvement Plan)		✓		✓		✓		✓	business plan 24/27 approved on 28/03/2024. KPI Improvement Plan approved on 14/12/2023 6 monthly checkpoints initially agreed
Review Pension Administration Strategy		✓							3 year plan last approved on 28/07/2022
Review Communication strategy								✓	3 year plan last approved on 16/12/2021. E-communication strategy update and customer service assessment
TPR Breach Policy (Internal escalation strategy)				✓					Last reviewed on 17/02/2022. To review as part of new TPR GCOP requirements
Review Compliance with FRC stewardship code	✓							✓	Last approved on 28/03/2024. Annually - Consider TCFD requirements as part of the process
Review Triennial Valuation Process				✓				✓	Next valuation currently due 31/03/2025
Review Investment Strategy Statement					✓				Annual review, last approved on 02/03/2023 (Ensure inclusion of MiFID II arrangements)
Review Fund "Responsible Investment Strategy"			✓						To be reviewed in conjunction with the Investment Strategy Statement. To cover Climate Change Statement. To also cover topical changes on policy relating to BPP & ESG
Review Admin Charging Policy									3 year plan last approved on 28/07/2022. No reviewed expected in 2024/25
Review Admin Authority Discretions									3 year plan last approved in 28/03/2024. No reviewed expected in 2024/25
Review Employer Cessations policy (New Employer Policy)									3 year plan last approved in 13/07/2023. No reviewed expected in 2024/25
Review Funding Strategy Statement									3 year plan last approved on 17/11/2022. Next Fund Valuation 31/03/2025
ADMINISTRATION									Comments
Receive an annual report of an complaint & IDPR cases, including a review of the Fund's procedures		✓							Covered in Low Volume Performance Report.
Review of Cyber, Data Security & Business Recovery							✓		Report sets out the arrangements in place & when they were last tested. Includes annual update on cyber administration following the PI exercise. To include reconciliations, cashflows and certificate of existence
Review of Payroll				✓					

Committee KPIs to monitor		✓		✓		✓		✓	performance reporting. Including outsourced backlog
Strategic Project reviews						✓		✓	Regular updates on strategic projects, for example McCloud and the Pensions Dashboard
Benchmark KPIs in Annual Report & Accounts information with other Funds								✓	Annual Report & Accounts must be disclosed each 1st December
Review of Annual Benefit Statement and Pension Saving Statement processes				✓					Percentage issued, action plan to issue outstanding ABSs & process improvement review
Review employers compliance (data)				✓					Ideally incorporate with ABS review process & update on Fund's Data Improvement Plan. Statistics on Employer Report
Payroll migration, i-Connect & Members Self-service update						✓			Present as part of a Fund digital platform update. Progress report on take up and functional developments
INVESTMENT PERFORMANCE & RISK									Comments
Investment Quarterly Progress Report	✓		✓		✓		✓		Provided by each Investment Manager, the Investment Adviser & the Investment Consultant, who summarise the information and offer independent assessment of the market generally.
Review Investment performance against Fund's benchmarking criteria	✓	✓	✓		✓		✓		To be presented quarterly and in conjunction with the draft Annual Report & Accounts
Investment Strategy Review / Asset Allocation Review	✓		✓		✓		✓		Quarterly review of strategy, plus an annual document last updated in 17/11/2022. To cover topical changes relating to BPP & SSC
Governance update relating to BPP	✓		✓		✓		✓		Quarterly (generally verbal) update on Brunel governance and operational issues
Cost transparency of BPP, Managers & the Custodian			✓						Usually presented in conjunction with the draft Annual Report & Accounts
Total number of Agenda Items:	9	17	9	17	9	15	8	18	

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