

INTERNAL AUDIT UPDATE

Purpose of the Report

1. The purpose of this report is to present to members the final Internal Audit Report prepared by the South West Audit Partnership (SWAP) in respect of the Wiltshire Pension Fund. This report was issued on 7 October 2020.

Background

2. The internal auditor undertook an audit covering the Fund's processes concerning its key financial controls, the Data Protection Act 2018/GDPR & MiFID II during September. The final report, including agreed management actions, is attached for consideration by the Local Pension Board (see Appendix A).
3. In summary the final Audit Report on all three of these areas gave an opinion of 'reasonable assurance', stating;

"generally sound system of governance, risk management and controls were in place. However, some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the areas audited".

4. The auditor made five recommendations for improvements, all of which are contained in the attached report.

Considerations for the Board

5. For members information the five recommendations were;
 - a) **Page 7** – Officers to liaise with each other to ensure that a review of the member contribution issues raised are undertaken promptly, to future-proof the processes used and ensure appropriate efficiencies have been made (**Medium priority**);
 - b) **Page 8** – To ensure that the Altair workflow for processing death grants is updated to include the check on the NI database, on notification of a death at the beginning of the process (**Low priority**);
 - c) **Page 9** – To ensure that a Data Officer is set up with the access required to the Fund's Docmail system and inducted on its use (**Low priority**);
 - d) **Page 10** – The Head of Pension Administration and Relations will ensure (**Medium priority**):
 - 1) That officers complete a review of the Docmail system's DPIA to ensure that all risks relating to the processing of personal data have been captured and appropriately mitigated; &
 - 2) That all staff and managers with specific responsibilities for the completion of DPIAs receive any further training required to complete the procedure effectively.
 - e) **Page 11** – The Governance and Performance Manager will ensure (**Low priority**):
 - 1) That a review of the current DPIA procedure and standard DPIA template takes place so that they consistently reflect the procedures & are clear and easy to follow, providing both a risk scoring methodology and assessment guidance; &
 - 2) The above documents should then be re-communicated to all relevant staff and

managers and their feedback invited to ensure good understanding of the procedures.

6. The appendix to the audit report, also included within this pack, shows the responses from the majority of the team in respect to a short survey from SWAP concerning data protection. The results from this survey was positive and showed a good level of confidence in individual's roles and responsibilities.

Environmental Impact of the Proposal

7. There is no known environmental impact of this proposal.

Safeguarding Considerations/Public Health Implications/Equalities Impact

8. There are no known implications at this time.

Financial Considerations & Risk Assessment

9. There are no financial considerations resulting from this proposal although the paper reviews risk as part of the audit.

Proposals

10. The Board is asked to note the findings of the SWAP audit report and the management responses stated within the report.

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

Appendices:

- Appendix 1 – SWAP Audit Report.
- Appendix 2 – Appendix to SWAP Audit report