

Finding	Action												
<p><b><u>A: New Enrolments</u></b></p> <p>We reviewed a sample of 25 new joiners to the scheme and determined if they had been enrolled in line with the agreed process. 14 of the selected sample were enrolled outside of the i-Connect system, 11 were enrolled using i-Connect. We noted the following issues:</p> <ul style="list-style-type: none"> <li>• 1 of the 14 new joiner spreadsheets received from the employer outside of i-Connect had not been saved in the SharePoint repository and 2 of these were entered into the Altair system after the expected SLA deadline.</li> <li>• 12 of the 25 new joiner enrolments were sent activation keys and new joiner letters after the expected SLA deadline.</li> </ul> <p>We reviewed 3 new enrolment reconciliations from May, August and October 2021. The reconciliations should be signed off by the Employer Services and Systems Manager however none of the reconciliations were. We also noted that the reconciliations were time-consuming, taking up to 2 weeks to complete. This is mainly because many false errors are produced as the data used is not like for like.</p>	<p>We will remind staff to ensure new joiner spreadsheets are saved in the SharePoint repository.</p> <p>We will monitor the timeliness of the distribution of new joiner letters and activation keys and take further action if this is not improved.</p> <p>We will ensure reconciliations are appropriately signed off. We will also review the reconciliation process itself to see if efficiency improvements can be made.</p> <table border="1" data-bbox="1348 737 2110 914"> <tr> <td data-bbox="1348 737 1456 790"><b>Priority</b></td> <td data-bbox="1456 737 1702 790">2</td> <td data-bbox="1702 737 1926 790"><b>SWAP Reference</b></td> <td data-bbox="1926 737 2110 790"></td> </tr> <tr> <td data-bbox="1348 790 1702 849"><b>Responsible Officer</b></td> <td colspan="3" data-bbox="1702 790 2110 849">Head of Wiltshire Pension Fund</td> </tr> <tr> <td data-bbox="1348 849 1702 914"><b>Timescale</b></td> <td colspan="3" data-bbox="1702 849 2110 914">31<sup>st</sup> May 2022</td> </tr> </table>	<b>Priority</b>	2	<b>SWAP Reference</b>		<b>Responsible Officer</b>	Head of Wiltshire Pension Fund			<b>Timescale</b>	31 <sup>st</sup> May 2022		
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<p><b><u>B: Contributions</u></b></p> <p>The Fund is currently establishing a schedule which states the contribution rates each employer should pay. This process needs to be finalised and the Fund needs to develop a mechanism to ensure the correct rates are recorded and controlled going forward.</p> <p>It was also noted that there was not clear ownership within the Fund for resolving contributions issues.</p>	<p>We will ensure the employer contribution rates schedule is finalised and procedures are put in place to make sure it is well controlled going forward.</p> <p>We will discuss roles and responsibilities with the team to ensure there is clear ownership with raising and resolving issues.</p> <table border="1" data-bbox="1348 1295 2110 1466"> <tr> <td data-bbox="1348 1295 1456 1348"><b>Priority</b></td> <td data-bbox="1456 1295 1702 1348">2</td> <td data-bbox="1702 1295 1926 1348"><b>SWAP Reference</b></td> <td data-bbox="1926 1295 2110 1348"></td> </tr> <tr> <td data-bbox="1348 1348 1702 1423"><b>Responsible Officer</b></td> <td colspan="3" data-bbox="1702 1348 2110 1423">Head of Wiltshire Pension Fund</td> </tr> <tr> <td data-bbox="1348 1423 1702 1466"><b>Timescale</b></td> <td colspan="3" data-bbox="1702 1423 2110 1466">31<sup>st</sup> May 2022</td> </tr> </table>	<b>Priority</b>	2	<b>SWAP Reference</b>		<b>Responsible Officer</b>	Head of Wiltshire Pension Fund			<b>Timescale</b>	31 <sup>st</sup> May 2022		
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<p><b><u>C: Lumpsum Payments</u></b></p> <p>We reviewed a sample of members in receipt of lumpsum payments because of death, transfers out of the scheme or retirement and determined if the agreed process had been followed. See summary of issues below.</p> <p><b><u>Death Payments:</u></b></p> <ul style="list-style-type: none"> <li>• 8 out of 10 letters requesting supporting information were sent out after the SLA deadline</li> <li>• 3 out of 10 final payment authorisations were processed after the SLA deadline</li> <li>• 1 out of 10 payments did not have a death grant decision form on file</li> <li>• 1 out of 10 of the payments signed off were processed by the same person involved in the calculation</li> </ul> <p><b><u>Transfers Out:</u></b></p> <ul style="list-style-type: none"> <li>• 5 out of 10 letters of calculation were generated after the SLA deadline</li> <li>• 1 out of 10 letters of calculation were not peer reviewed</li> </ul> <p><b><u>Retirements:</u></b></p> <ul style="list-style-type: none"> <li>• 1 out of 10 members were contacted after the SLA deadline</li> <li>• 2 out of 10 payments were not followed up in a timely manner when documents had not been received from the member</li> <li>• 2 out of 10 payments were authorised by the same person that was either involved with producing the actual calculation or peer reviewing the actual calculation</li> <li>• Members can submit requested documents through the My Wiltshire Portal. However, this functionality is currently not working as there is a bug in the system. We noted 1 instance where the forms from the My Wiltshire Portal were filled out and returned to the Fund via email. However, these forms do not require signatures and subsequently were not appropriately signed by the member, but the payment was still processed.</li> <li>• We were advised that bank details will soon be auto populated to the Altair database from information filled out by the member using the Member Self Service System (MSS), but this is not yet in place.</li> <li>• It was noted that it isn't clear what date should be used for retirement calculations, the retirement date, or the date payable.</li> </ul>	<p>We will monitor the timeliness of processing lumpsum payments and take further action if this is not improved.</p> <p>We will remind staff of the importance of saving necessary documentation to support transactions on members files.</p> <p>We will review the payments approval process and structure to ensure payments are always approved independently by someone who has not been involved in calculating the payment.</p> <p>We will investigate the bug in the My Wiltshire Portal which is preventing members from submitting documents and ensure any forms received from members via email are signed.</p> <p>We will advise staff which date should be used when processing retirement payments and update process notes accordingly.</p> <table border="1" data-bbox="1339 1007 2128 1198"> <tr> <td data-bbox="1339 1007 1453 1054"><b>Priority</b></td> <td data-bbox="1453 1007 1720 1054" style="background-color: #FFD700; text-align: center;">2</td> <td data-bbox="1720 1007 1944 1054"><b>SWAP Reference</b></td> <td data-bbox="1944 1007 2128 1054"></td> </tr> <tr> <td data-bbox="1339 1054 1720 1131"><b>Responsible Officer</b></td> <td colspan="3" data-bbox="1720 1054 2128 1131">Head of Wiltshire Pension Fund</td> </tr> <tr> <td data-bbox="1339 1131 1720 1198"><b>Timescale</b></td> <td colspan="3" data-bbox="1720 1131 2128 1198">31<sup>st</sup> October 2022</td> </tr> </table>	<b>Priority</b>	2	<b>SWAP Reference</b>		<b>Responsible Officer</b>	Head of Wiltshire Pension Fund			<b>Timescale</b>	31 <sup>st</sup> October 2022		
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<p><b><u>D: Transfers into the Fund</u></b></p> <p>Money received from members previous funds is recorded in the SAP system on the general ledger as an asset, but the corresponding liability is not always recorded on the members file in the Fund’s Altair system. This can result in a false representation of assets and liabilities in the Fund’s accounts.</p>	<p>We will carry out a reconciliation to identify transfers in that have been processed in the SAP system but not in Altair. We will ensure Altair is updated with any missing liabilities and embed the new process to monitor transfers in are accurately processed going forward.</p> <table border="1" data-bbox="1344 446 2128 590"> <tr> <td data-bbox="1344 446 1456 502"><b>Priority</b></td> <td data-bbox="1456 446 1736 502">2</td> <td data-bbox="1736 446 2128 502"><b>SWAP Reference</b></td> <td data-bbox="2128 446 2128 502"></td> </tr> <tr> <td data-bbox="1344 502 1736 550"><b>Responsible Officer</b></td> <td colspan="3" data-bbox="1736 502 2128 550">Head of Wiltshire Pension Fund</td> </tr> <tr> <td data-bbox="1344 550 1736 590"><b>Timescale</b></td> <td colspan="3" data-bbox="1736 550 2128 590">31<sup>st</sup> May 2022</td> </tr> </table>	<b>Priority</b>	2	<b>SWAP Reference</b>		<b>Responsible Officer</b>	Head of Wiltshire Pension Fund			<b>Timescale</b>	31 <sup>st</sup> May 2022		
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<p><b><u>E: Amendments</u></b></p> <p>We reviewed a sample of amendments made to members files and determined if the correct process was followed; this included changes to the members name, address and nominated beneficiary. See summary of issues noted below:</p> <p><b>Name change:</b></p> <ul style="list-style-type: none"> <li>1 of the 7 name changes did not have a marriage certificate saved on the file to evidence the name change.</li> </ul> <p><b>Nomination change:</b></p> <ul style="list-style-type: none"> <li>5 of the 12 nomination changes were processed after the expected SLA deadline.</li> </ul> <p><b>Address change:</b></p> <ul style="list-style-type: none"> <li>1 of the 25 address changes were processed after the expected SLA deadline.</li> <li>A tracing agency called Target is used when the Fund is not able to contact a member using the address recorded. Target help locate the member, and they notify the Fund of a change of address. 3 out of the 25 address changes reviewed were because of a notification from Target, however the notification was not saved on the members file as evidence.</li> </ul>	<p>We will remind staff of the importance of saving evidence to support any changes made in Altair.</p> <p>We will monitor the timeliness of processing amendments and take further action if this is not improved.</p> <table border="1" data-bbox="1344 1165 2128 1331"> <tr> <td data-bbox="1344 1165 1456 1220"><b>Priority</b></td> <td data-bbox="1456 1165 1736 1220">2</td> <td data-bbox="1736 1165 2128 1220"><b>SWAP Reference</b></td> <td data-bbox="2128 1165 2128 1220"></td> </tr> <tr> <td data-bbox="1344 1220 1736 1292"><b>Responsible Officer</b></td> <td colspan="3" data-bbox="1736 1220 2128 1292">Head of Wiltshire Pension Fund</td> </tr> <tr> <td data-bbox="1344 1292 1736 1331"><b>Timescale</b></td> <td colspan="3" data-bbox="1736 1292 2128 1331">31<sup>st</sup> October 2022</td> </tr> </table>	<b>Priority</b>	2	<b>SWAP Reference</b>		<b>Responsible Officer</b>	Head of Wiltshire Pension Fund			<b>Timescale</b>	31 <sup>st</sup> October 2022		
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<p><b>F: Monitoring</b></p> <p>The Fund’s Altair system has a workflow functionality which can be used to automatically distribute and monitor tasks for the team to carry out. We reviewed the workflow and noted there is a backlog of tasks going back to 2013, see further details under finding H below. The Fund was unable to quantify how much work was in the backlog or clarify if the status of tasks was correct. This makes managing deadlines difficult and prevents the Fund from producing forward looking KPIs.</p> <p>A monthly performance dashboard is currently being produced to record reconciliation checks between the Altair and SAP systems. This needs to be finalised and updates should be reported to the Pensions Committee. The Fund should also consider if the one-off payments module should be purchased so BACs payment runs can be directly produced out of the Altair system. This would reduce the risk of errors between SAP and Altair and eliminate the need to carry out as many checks. In our previous reports we have raised actions to carry out a full reconciliation between Altair and SAP, this has not been done.</p> <p>No quality assurance over the Fund’s processing is conducted by management to ensure work is carried out correctly.</p> <p>The Fund maintains its own operating budget. Some services are provided by the Council and then recharged to the fund, for example, payroll, legal, internal audit etc. However, the Fund do not receive underlying data from the Council to substantiate the amounts recharged.</p>	<p>We will review the process of distributing tasks to team members and ensure there is a robust process to monitor SLAs and team capacity / backlog. KPIs will be reported to the Pensions Committee regularly.</p> <p>We will finalise the monthly performance dashboard and report updates to the Pensions Committee regularly.</p> <p>We will carry out a full reconciliation between Altair and SAP and ensure this is done on a regular basis.</p> <p>We will consider if the one-off payments module in Altair should be purchased.</p> <p>We will review and embed the formal quality assurance process to help ensure work is carried out by the team correctly.</p> <p>We will liaise with the Council to obtain underlying data to support the amounts recharged to the Fund by the Council yearly.</p> <table border="1" data-bbox="1348 901 2123 1072"> <tr> <td data-bbox="1348 901 1456 949"><b>Priority</b></td> <td data-bbox="1456 901 1736 949"><b>1</b></td> <td data-bbox="1736 901 2123 949"><b>SWAP Reference</b></td> </tr> <tr> <td data-bbox="1348 965 1736 1029"><b>Responsible Officer</b></td> <td colspan="2" data-bbox="1736 965 2123 1029">Head of Wiltshire Pension Fund</td> </tr> <tr> <td data-bbox="1348 1029 1736 1072"><b>Timescale</b></td> <td colspan="2" data-bbox="1736 1029 2123 1072">31<sup>st</sup> July 2022</td> </tr> </table>	<b>Priority</b>	<b>1</b>	<b>SWAP Reference</b>	<b>Responsible Officer</b>	Head of Wiltshire Pension Fund		<b>Timescale</b>	31 <sup>st</sup> July 2022	
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<p><b><u>G: Projects</u></b></p> <p>In addition to the Fund’s everyday tasks, there are currently two main projects; i-Connect Enrolments and Pensions Payroll Reconciliations. We reviewed the project methodology for both and noted the following issues:</p> <ul style="list-style-type: none"> <li>• There is not a formal project plan, issues or risk log for the i-Connect Enrolments project and further work could be done to proactively bring the project to a close.</li> <li>• The Pensions Payroll Reconciliation project is more formally managed however the project Gantt chart does not include task statuses, so you are unable to get a clear picture of project slippage and the subsequent impact on key milestones and dependencies. Meeting actions are not formally captured, and update progress reports are not produced or communicated to the Pensions Committee.</li> </ul>	<p>We will review the project methodology used to manage the Funds projects and implement changes to help improve oversight and efficiency.</p> <p>We will consider ways to proactively progress the i-Connect project, for example employer site visits.</p> <table border="1" data-bbox="1346 544 2125 708"> <tr> <td data-bbox="1346 544 1458 587"><b>Priority</b></td> <td data-bbox="1458 544 1733 587">2</td> <td data-bbox="1733 544 1957 587"><b>SWAP Reference</b></td> <td data-bbox="1957 544 2125 587"></td> </tr> <tr> <td data-bbox="1346 587 1733 667"><b>Responsible Officer</b></td> <td colspan="3" data-bbox="1733 587 2125 667">Head of Wiltshire Pension Fund</td> </tr> <tr> <td data-bbox="1346 667 1733 708"><b>Timescale</b></td> <td colspan="3" data-bbox="1733 667 2125 708">31<sup>st</sup> July 2022</td> </tr> </table>	<b>Priority</b>	2	<b>SWAP Reference</b>		<b>Responsible Officer</b>	Head of Wiltshire Pension Fund			<b>Timescale</b>	31 <sup>st</sup> July 2022		
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<p><b>H: Operational Backlog</b></p> <p><b>Aggregations:</b></p> <ul style="list-style-type: none"> <li>As noted in our previous report, the Fund has accumulated processing backlogs for aggregations. Progress has been made to clear the backlog, but it remains an ongoing issue. We note that regular progress updates are reported to the Pensions Committee but an improvement plan to help clear the back log has not been drafted (as recommended in our previous report).</li> </ul> <p><b>Frozen refunds:</b></p> <ul style="list-style-type: none"> <li>If a member leaves the scheme in the vesting period (this is currently 2 years but was previously 3 months after joining the scheme), they are entitled to a refund of their contributions. The Fund write to members to inform them of their refund entitlement, and until refunded their fund sits as a frozen refund on the Altair system. There is a back log of frozen refunds amounting to circa 2 million pounds and dating back to 1974 which have not been followed up on since the initial letter was sent to the member.</li> </ul> <p><b>Retired members:</b></p> <ul style="list-style-type: none"> <li>There are 107 members on the Altair system who are over 75 years old and therefore have reached an age that their pension must be paid. The Fund are currently looking at the ones overdue and determining the next steps required.</li> </ul> <p><b>Status 3 members:</b></p> <ul style="list-style-type: none"> <li>Status 3 members are ex members that no longer have any liability in the Fund because they have received a refund or because they have transferred out of the Fund, but the members personal is still recorded in the Altair system. This is a breach of data protection regulations as the Fund should only keep personal data when it is necessary. In the Funds Data Retention Policy, it is stipulated that members' personal data should be minimised after 7 years of leaving the Fund and deleted after 15 years. There are 4652 member files where the information should be minimised and 14809 member files which should be deleted.</li> </ul>	<p>We will review the backlog of aggregations, frozen refunds and retired members and take necessary steps to ensure this is progressed where possible.</p> <p>We will develop controls to monitor backlog in these areas going forward and report updates to the Pensions Committee regularly.</p> <p>We will review the data stored for status 3 members and determine a way to remove any personal data which is no longer necessary.</p> <table border="1" data-bbox="1337 1034 2121 1201"> <tr> <td data-bbox="1337 1034 1447 1082">Priority</td> <td data-bbox="1447 1034 1722 1082">1</td> <td data-bbox="1722 1034 1984 1082">SWAP Reference</td> <td data-bbox="1984 1034 2121 1082"></td> </tr> <tr> <td data-bbox="1337 1082 1722 1158">Responsible Officer</td> <td colspan="3" data-bbox="1722 1082 2121 1158">Head of Wiltshire Pension Fund</td> </tr> <tr> <td data-bbox="1337 1158 1722 1201">Timescale</td> <td colspan="3" data-bbox="1722 1158 2121 1201">31<sup>st</sup> May 2022</td> </tr> </table>	Priority	1	SWAP Reference		Responsible Officer	Head of Wiltshire Pension Fund			Timescale	31 <sup>st</sup> May 2022		
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<p><b><u>I: System Access Review Follow Up</u></b></p> <p>The Fund carried out an internal review of pension systems access in January 2020 and several actions were raised. We reviewed the progress of the actions raised in the report and found all actions apart from one had been implemented. Issue 1.6 of the report remains outstanding, this states that the Fund should create a schedule of software licenses for systems used within the Fund.</p>	<p>We will create a schedule of software licenses for systems used within the Fund. Going forward the results of the annual access review will be reported to the Head of Service.</p> <table border="1" data-bbox="1326 375 2123 518"> <tr> <td data-bbox="1326 375 1442 418"><b>Priority</b></td> <td data-bbox="1442 375 1720 418">2</td> <td data-bbox="1720 375 1982 418"><b>SWAP Reference</b></td> <td data-bbox="1982 375 2123 418"></td> </tr> <tr> <td data-bbox="1326 418 1720 483"><b>Responsible Officer</b></td> <td colspan="3" data-bbox="1720 418 2123 483">Head of Wiltshire Pension Fund</td> </tr> <tr> <td data-bbox="1326 483 1720 518"><b>Timescale</b></td> <td colspan="3" data-bbox="1720 483 2123 518">31<sup>st</sup> May 2022</td> </tr> </table>	<b>Priority</b>	2	<b>SWAP Reference</b>		<b>Responsible Officer</b>	Head of Wiltshire Pension Fund			<b>Timescale</b>	31 <sup>st</sup> May 2022		
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