

WILTSHIRE COUNCIL

WILTSHIRE LOCAL PENSION BOARD
05 May 2022

PENSION FUND – LOW VOLUME PERFORMANCE REPORT

Purpose of the Report

1. The purpose of this report is to update the Board on the Fund's performance measures for 2021/22 in connection with the following areas.
 - a) ICO Data Protection breaches;
 - b) tPR breaches;
 - c) Freedom of Information (FOI) requests;
 - d) Complaints;
 - e) Internal Dispute Resolution Procedures (IDRPs); &
 - f) Subject Access Requests (SAR).

Background

2. As part of the Fund's good governance arrangements, it maintains a range of performance measures which sit alongside the Fund's KPI's such as administration casework, data quality & benchmarking. However, whilst officers report on high volume KPIs, such as casework completion at each quarterly meeting, it was felt that to provide meaningful analysis of low volume performance measures such as those identified above, the statistics would only warrant being presented to the Board on completion of each scheme year.
3. The scope of the compliance requirements for the maintenance of the low volume performance measures is identified below.
 - a) The Data Protection Act 2018 in respect of Data Protection breaches & Subject Access Requests
 - b) The Pension Regulator's Code of Practice 14 in respect of tPR breaches, complaints & IDRPs
 - c) The Freedom of Information Act 2000

Considerations for the Board

4. The tables illustrated in Appendix I present a summary of each of the performance measures, which are supported by both an introduction to the measure and an officer comment highlighting any themes which can be observed from the measures recorded.

Conclusions

5. In addition to the individual commentary provided in respect of each low volume performance measure set out in appendix I officers have drawn the following general conclusions from these performance measures;
 - a) **Complaints & IDRPs** – Whilst completion of the payroll reconciliation exercise has been slower than expected the preparation to complete such a complicated exercise has been considerable. A quiet success of this project, which has carried enormous reputational risk to the Fund, has been the minimal number of complaints and IDRPs

experienced. Consideration of the basis of anticipated complaints and the taking of legal advice to mitigate those complaints has led to this minimal experience.

- b) **Upholding of Complaints & IDPRs** – Of the 13 Complaints & 9 IDPRs only two were upheld and 1 partially upheld. This represents quite a low complaint success rate. In the spirit of treating customers fairly members may wish to consider whether the Fund's defences maybe overly robust in defending its interests.
- c) **Fund Website** – To improve the stakeholder experience the Fund should ensure members, employers and other all other interested parties have a convenient framework by which to make Subject Access and Freedom of Information Requests. It is recommended that such a framework is provided in a similar manner to other activities such as submitting compliments, complaints & IDPR requests.

Environmental Impact

- 6) There is no environmental impact from this report.

Financial Considerations

- 7) There are no immediate financial considerations.

Risk Assessment

- 8) There are no risks identified at this time.

Legal Implications

- 9) There are no immediate legal implications arising from this report.

Safeguarding Considerations/Public Health Implications/Equalities Impact

- 10) There are no implications at this time.

Proposals

- 11) The Board is asked to note the findings of the low volume performance report being monitored by officers on behalf of the Fund.

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