WILTSHIRE COUNCIL

WILTSHIRE LOCAL PENSION BOARD 24 May 2023

PENSION FUND - LOW VOLUME PERFORMANCE MONITORING

Purpose of the Report

- 1. The purpose of this report is to update the Board on the Fund's performance measures for 2022/23 in connection with the following areas;
 - A) ICO Data Protection breach log;
 - B) tPR breach log;
 - C) Freedom of Information (FOI) log;
 - D) Subject Access Request (SAR) log.
 - E) Complaints log: &
 - F) Internal Dispute Resolution Procedures (IDRPs) log;

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, data quality & benchmarking. However, whilst officers report on high volume KPI's such as administration 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 presents 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 on these KPI's:
- a) **General Activity** Giving consideration to the circa 80,000 members being managed by the Fund and the volume of activity being experienced, as well as the general nature of that activity, this report suggests that a low impact of performance errors and variances is currently affecting the Fund's day-to-day operating practices. However, as outlined in the Pension Regulator's breach log reporting section, this report excludes the Fund's

- disclosure obligations for practical purposes. An area which would significantly alter the results included within this report.
- b) **Reporting to Committee –** In May 2022 the Board agreed that it would only recommend that this report is submitted to the Committee if it felt that a material operational need is present that would warrant the attention of the Committee. It would then only submit that part of the report requiring the Committee's attention on that exception basis only.

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 measures being monitored by officers on behalf of the Fund.

Jennifer Devine Head of the Wiltshire Pension Fund

Report Author: Richard Bullen - Fund Governance Manager