



Appendix 1

**Findings & Action Plan** 

Finding	Action			
A: New Enrolments  At the time of our audit about 60% of employers within the Fund were enrolled in the Fund's Pensions Administration System I-Connect which was introduced in 2020. We were advised that the Fund was having difficulty onboarding the remaining employers as they were unable and or unwilling to provide the data submissions in the required format to be uploaded into I-Connect. If an employer is not enrolled on I-Connect it has a negative effect on the time it takes the Fund to process administrative duties for those members and there is a greater risk of things being processed incorrectly as more manual entry and manipulation is required.  To help encourage employers to invest time in formatting their data, the Fund has discussed issuing additional administrative charges using an employer score card to determine employers which are more cumbersome.		which require additional administrative time and implement reasonable charges to address this.  We will continue to encourage employers to join i-Connect, prioritising the largest remaining employers.		
During our review we identified that the employer score cards have not been finalised and no employers have been issued charges for additional administrative time.	Priority	2	SWAP Reference	425
been issued charges for additional administrative time.		ble Officer	Head of Wiltshire Pension Fund and Employer Services Manager (once in post)	
	Timescale	2	30/09/2023	

#### **January 2024 Update**

We agree with the Fund's assessment of 50% progress made. Based on documentation received, the Fund has made good progress with documentation and resources required to encourage employers to join i-Connect. They have also produced an employer scorecard template. However, onboarding is currently paused.

Limited progress appears to have been made regarding finalising employer score cards and identifying employers which require additional administrative time. As mentioned in the Fund's update, they are reluctant to introduce additional charging, and consideration of trigger points and arrangements is to be determined.





#### **Finding**

#### **B: Overpayments**

When a member leaves the Fund, an overpayment maybe made due to processing delays and as such needs to subsequently be recovered by the Fund. At the time of our review there were member overpayments going back to 2016 amounting to £153,509, and in addition to this since 2021 £24,002 has been written off. We were informed that anything which is below £250 is automatically written off however, the Fund was not following the write off process for values above this amount.

We were also advised that the Fund does not review the outstanding overpayments on a regular basis. As mentioned in finding J below, there are no KPIs for chasing aged debt and as such it is not monitored in the management report.

#### **Action**

We will ensure outstanding overpayments are reviewed and chased on a regular basis. The monitoring of this will form part of the KPI (Action J) below.

We will ensure the aged debt is reviewed on a regular basis to determine if anything should be written off. This will follow the write off process contained in the overpayment's procedure.

Priority	2	SWAP Reference	426	
Responsi	ble Officer	Member Services Manager		
Timescal	e	30/04/2023		

#### January 2024 Update

We agree with the Funds assessment of 80% progress made. The fund has confirmed that a monthly report of aged debt is issued. We were provided with the Overpayments Policy which is satisfactory evidence of their agreed action having taken place. We have reviewed the new scheme of sub delegation and payment approval policy as part of our Pensions Payroll Implementation work and are satisfied with the contents of this document also.

The remaining 20% appears to consist of finalising the overpayments policy and the write off of overpayments on death procedure.





### Finding Action

#### C: Lump sum Payments

We reviewed a sample of members in receipt of lump sum payments because of death, transfers out of the Fund or retirement and determined if the agreed process had been followed. See summary of issues below.

#### Deaths:

• 2 out of 10 from the sample tested had been closed without final letters being sent to the beneficiary or the estate. The Fund had identified this as a reoccurring issue during our audit and as such were determining if a report could be run to identify any anomalies. The Fund advised that it will be introducing this report as an additional control which will be run on a quarterly basis.

#### Transfers out:

• 1 of the 11 lump sum payments made were signed off after the SLA deadline. This payment exceeded 100k, members of the Member Services Team were not aware that the Head of the Wiltshire Pension Fund has authority to sign off payments above this value and should be contacted if another staff member with authority is not available.

We will finalise the report to help identify death cases which have been closed without final letters being sent. We will ensure letters are sent for any cases identified and run the report to identify anomalies on a regular basis going forward, so issues are addressed in a timely manner.

We will ensure that all team members are aware of who has authority to sign off lump sum payments and to what level.

Priority	2	SWAP Reference	427	
Responsible Officer		Member Services Manager		
Timescale	2	30/04/2023		
Revised 1	ïmescale	31/07/2023		

#### January 2024 Update

We agree with the Fund's assessment of 70% progress made. The death casework report has been prepared. We have also been informed that members services have finalised the letter.

SWAP has already completed advisory work on the immediate payments system. Whilst advisory, assurance can be drawn from the fact that we reviewed segregation of duties as part of our work and were satisfied with the proposed controls. The payment approval policy was also reviewed as part of this work.

We have also been provided with some procedure notes to evidence the work that has taken place during review and update of said notes.





Finding	Action			
D: Transfers into the Fund				
In our previous audit in March 2022, we identified when a member transfers into the Fund, the 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	Any delay	nsure Altair is updated w	ighted in the weekly F	(PI report. This
in a false representation of assets and liabilities in the Fund's accounts. Since our previous audit the unallocated money has fallen from £5 million in July 2022 to £1 million at the time of our audit.	action is	also reflected in the Findi	ing J below regarding	KPIS.
We were advised that any cases that are not allocated within 20 days of receipt of the money fall outside of the Fund's SLA deadline and as such should be flagged as an issue. We reviewed the aging analysis for unallocated transfers in and noted there were 153 cases which date back to 2018. This has not been flagged in the weekly KPI and performance reports which go to the Management team as an issue. There is therefore a risk of this going unresolved.				
We reviewed a sample of 3 transfers in and noted all 3 had significant delays, including one which was sat with	Priority	2	SWAP Reference	428
the fund for 11 months before being actioned. This case had not been flagged as being overdue in the KPIs as				lanager
	Timescale	e	31/12/2023	

#### January 2024 Update

The Fund has stated 95% progress against this action, however there was not enough evidence available at the time of this follow up to enable our agreement with this assessment. We have been provided with the final, updated TV-in procedure. The document does state that funds should be allocated promptly within 5 days receipt, but the timescales are not strictly laid out and there is no mention of SLAs or the reason for the target. Based on this, we are not confident that we have enough evidence to suggest the aging analysis will improve going forward.

We have not been able to confirm whether the cases identified have been resolved.





# Finding Action E: Amendments

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:

#### Nomination change:

• 1 of the 8 nomination changes, the Fund had not saved evidence in Altair to support the reason for the nomination change.

#### Address change:

- 1 of the 10 address changes, the correspondence address had not been updated in Altair, the Fund had overwritten the address on a correspondence letter only.
- 1 of the 10 address changes, the Fund had been trying to trace a member since 2020 through a tracing agency called Target. A low match had been received back from Target, but a workflow task had not been set up to schedule a full search and as such no further progress has been made.

We will remind staff of the importance of saving evidence to support any changes made in Altair.

We will remind staff of the processes which should be followed when making address changes and ensure this is monitored as part of the Quality Assurance (Action K) below.

Priority	3	SWAP Reference	429	
Responsi	ble Officer	Member Services Manager		
Timescal	e	30/04/2023		
Revised 1	<b>Fimescale</b>	30/06/2023		

#### January 2024 Update

We agree with the Fund's assessment of 100% progress made against this action and note that this action may now be closed.





#### **Finding**

#### F: Aggregations Processing and Backlog

Aggregations are where a member has multiple pensions within the Fund (i.e. from different roles), it is a legislative requirement that these pensions are aggregated into one pension.

#### Aggregations Historical Backlog:

In our previous audit we found there were a number of unresolved aggregations resulting in a large backlog of work. Since our last audit the Fund has outsourced 3500 cases to a company called Hymans who have agreed to work through the cases over the next 11 months. However, during our review 500 additional cases were identified. We were advised that these had not been picked up in the original data to be outsourced as a workflow status had not been set against them in Altair and as such did not appear in the data.

#### Aggregations Ongoing Backlog:

We reviewed the process followed to manage future ongoing aggregations to determine if they are being processed in a timely manner to ensure a backlog does not occur again in the future. Aggregations processing is managed by the Employer Services Team however, we were advised that they do not have a robust workflow allocation process to manage this work. Furthermore, no targets have been set for processing the work and the manager believed that the team do not see the importance of completing this work and as such it is prioritised behind other tasks.

#### Action

We will ensure that the additional 500 aggregation cases identified are analysed and workflows are updated in Altair to ensure a complete picture is reported in the weekly KPI reports. A plan will be developed to ensure timely completion of these tasks and progress updates will be reported to the Pensions Committee on a regular basis.

We will determine if there are any other historical aggregations which have not been outsourced.

We will implement a robust process to ensure future aggregations are processed in a timely manner by setting defined SLAs for completion. This action also forms part of the Workflow (Action I) below.

We will ensure the SLAs for future aggregations are regularly monitored for adherence and included in the weekly KPI report. This action is also reflected in the Finding J below regarding KPIs.

We will remind staff of the importance of completing the aggregation tasks and any under performance in this area will be formally addressed.

Priority	1	SWAP Reference	430
Responsi	ible Officer	Head of Wiltshire Pension Fur Operations Manager a Employer Services Manager (on in post)	
Timescal	e	30/09/2023	
Revised 7	Timescale	31/03/2024	

#### January 2024 Update

We agree with the Fund's assessment of 70% progress made against this action. The Fund has good oversight and understanding of the work that Hymans is completing to clear the outstanding aggregations. We have been provided with a copy of the project updates from Hyman – a weekly update is received stating how many have been cleared, how many are outstanding, and totals and tallies can be confirmed from this. The Fund do note that the project may take longer than anticipated.

We were also informed of the KPI Improvement Plan and are aware of the Administration Strategy review that is currently underway. SWAP was not able to review and assess the KPI Improvement Plan during the recent KPI audit as the document was not made available to the audit team.





#### **Finding**

#### **G: Status 2 Members**

When a member leaves their employer, they will initially go from being an Active Member to a Status 2 Member in Altair. A Status 2 member represents a leaver where their future pension status has not yet been determined, for example if their fund is going to be deferred or if they will have a refund etc.

We reviewed a report which identified that there was a backlog of 4277 cases currently at the Status 2 stage. We compared this to the outstanding leavers referenced in the latest KPIs reported to management and noted that this only stated 3501 cases (circa of 1200 short). We were advised that the figures differed as the KPI report does not include Status 2 cases where a workflow has not been set up in Altair and it also does not include cases which have been assigned a 'Status 2 Chase' workflow.

Status 2 processing is managed by the Employer Services Team however, we were advised that they do not have a robust workflow allocation process to manage this work and no targets have been set for processing the work.

We were also advised that the Fund does not have a clear picture of the types of leavers that are currently unprocessed i.e., if they are deferments, aggregations, refunds etc. Without this information it is difficult for the Fund to forecast how long it is going to take to clear the outstanding work.

#### Action

We will ensure the KPI report is amended so that it captures all Status 2 outstanding cases clearly. This will form part of the KPI action in Action J below.

We will implement a robust allocation method to ensure Status 2 cases are processed in a timely manner against defined SLAs. This will form part of the Workflow (Action I) below.

We will monitor performance and formally address any underperformance in this area.

We will ensure that the leaver backlog is fully analysed as a priority (action timescale 28/02/2023), and a plan made to clear the cases which are not outsourced to Hymans in a timely manner.

Priority	2	<b>SWAP Reference</b>	431
Responsi	ble Officer	Head of Wiltshire Pension Fu and Employer Services Mana (once in post)	
Timescal	e	30/09/2023	
Revised <sup>-</sup>	Гimescale	31/03/2024	

#### January 2024 Update

We agree with the Fund's assessment of 70% progress made against this action. The number of outstanding Status 2 cases accurately reflects this percentage. Further analysis of the KPIs was covered as part of SWAP's KPI review.





Finding	Action				
H: Retired Members  Retired members are those who are over 75 years old and therefore have reached an age that their pension must be paid. The Fund confirmed that there were no retired members which had not been contacted however, they are currently waiting for a report to be written to enable bulk letters to be sent out to members on a		members in bulk.			
regular basis. In the absence of this, each retired member has to be contacted individually, taking away time	Priority	3	<b>SWAP Reference</b>	432	
which could be spent on resolving other issues highlighted in this report.	Responsi	ble Officer	Member Services Mar	nager	
		2	31/03/2023		

#### January 2024 Update

We agree with the Fund's assessment of 100% progress made against this action and note that this action is now closed.





#### **I: Workflow Management**

#### **Member Services Team**

Our previous audit identified that the Fund was using the workflow built into Altair to distribute tasks however, there were many flaws in this system and as such the team's work was not being effectively managed and allocated. Since our last audit, a new workflow system has been introduced for to help manage the tasks completed by the Member Services Team which distributes tasks by a pre-defined priority of high to medium. A report is distributed to the team 3 times a week, the team must complete the high tasks first followed by medium tasks once all high tasks have been completed. We reviewed the corresponding KPIs and noted that medium tasks were falling behind the SLA deadlines on a regular basis. This was supported by our sample testing which identified the following exceptions:

- Retirements for 2 out of 10 of the sample tested the Election form, quote and member declaration form
  was not sent within the SLA deadline.
- **Transfers out** for 6 out of 11 of the sample tested the letter of calculation was not sent out by the Fund within the SLA deadline. These cases were all set as medium priority as they were all LGPS funds.

**Employer Services Team:** 

The new workflow system referenced above has not been implemented in the Employer Services Team. We were advised that the Fund plan to do this, but they need to work out the best way to pull the data to enable it to work effectively. Our sample testing over the Employer Services Team task identified the following exceptions regarding SLA adherence which may not have occurred if the tasks were appropriately managed and prioritised:

- Name change 3 out of the 8 name changes were not processed within the SLA deadline.
- Nomination change 2 of the 8 nomination changes were not updated within the SLA deadline.
- Address change 1 out of 10 the address change was not updated within the SLA deadline.

Finding F regarding Aggregations and G regarding Status 2 Members also highlights issues with how tasks in the Employer Services Team are managed.

We will review how medium tasks are managed and ascertain if any of these should be re prioritised. This will consider if the backlog of tasks is impacting compliance with the SLA deadlines.

We will introduce a process to manage overpayments (see Finding B above).

We will implement a robust workflow system to manage the tasks completed by the Employer Services Team.

Priority	2	SWAP Reference	433
Responsi	ble Officer	Head of Wiltshire Pe and Employer Service (once in post), and Services Manager	s Manager
Timescal	е	30/06/2023	

#### January 2024 Update

We agree with the Funds assessment of 85% progress made against this action. The review of IWAS is complete and the process for managing overpayments is complete. However, the process for implementing a workflow management system is still ongoing, and the Fund clearly acknowledges this and this reflects the 15% progress remaining.





#### **Finding**

#### J: KPIs, Reports and Monitoring of Staff Productivity

A weekly KPI report is produced and monitored by the Management team to help determine if tasks are being completed in line with the agreed SLAs. We reviewed the KPIs report and identified the following issues:

#### **Inaccuracy of KPIs**

- The aggregations KPIs were not accurate as it did not include aggregations where a workflow had not been set up.
- The Status 2 KPIs fall under the leavers data but this was not accurate as it did not include Status 2 members where a workflow had not been set up and did not include 'Status 2 Chase' workflows.
- The backlog of transfers in allocations was not flagged as an issue.
- 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. We were advised that this has been raised with the systems external support team; Heywoods.

#### **KPIs** not captured

- There are no KPIs to monitor the progress of overpayment aged debt chasing.
- There are no KPIs to monitor new joiners processing.
- There are no KPIs to monitor amendments processing.

We also reviewed how the Fund monitors the data recorded for active members to ensure the data quality requirements set by The Pensions Regulator are met. We were advised that a data quality report can be run but this is only done on an ad hoc basis and the results are not reported to management to monitor.

Finally, we reviewed how the Fund monitors staff productivity and found a weekly report has been introduced for the Member Services Team. For each type of task, the management team have determined an average time it should take to complete. A report is then produced weekly to look at the tasks which have been completed against the team members availability. In return a productivity percentage is produced. This is not yet live for the Employer Services Team but is in the testing phase.

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We will review the KPIs and address the inaccuracy issues identified.

We will introduce KPI monitoring for overpayments, new joiners, amendments.

We will regularly monitor the data quality for active members and ensure the requirements set by The Pensions Regulator are met.

We will implement the staff productively monitoring report in the Employer Services Team.

Priority	2	SWAP Reference	434	
Responsible Officer		Head of Wiltshire Pension Fund and Employer Services Manager (once in post), and Member Services Manager		
Timescal	e	30/04/2023		
Revised <sup>-</sup>	Гimescale	30/09/2023		

#### January 2024 Update

We agree with the Fund's assessment of 70% progress made against this action. Terminated cases and additional KPIs were covered as part of SWAP's KPI review. Overpayment aged debt chasing is being reported on and the procedure for chasing up is under review.





#### Finding

#### **K: Quality Assurance**

Our previous audit identified that no quality assurance was being carried out over the work processed within the Employer Services and Member Services Teams. Our review found that the Member Services Manager and their deputy have been completing quality assurance reviews of the Member Services Team since May 2022, but we identified the following weaknesses in the process:

- The quality assurance sample is selected at random and is not proportionality split by Officers and transaction types. There is therefore a risk that the sample is not representative.
- The number of cases reviewed each month differed, ranging from 1 case up to 20 cases. The Fund has not defined how many cases should be reviewed each month.
- The quality assurance is being completed at the same time and by the same person that reviews and signs off the case. The sign offs are therefore not independently quality assessed.

We also identified that no quality assurance reviews have been carried out over the work completed by the Employer Services Team. We were advised that the Fund is hoping to have this in place by the end of January 2023.

#### Action

We will review the quality assurance process and ensure all samples are representative in terms of officer and transaction types. We will also define how many cases should be reviewed each month and ensure the reviewer has not been involved with the case previously We will continue to monitor adherence through the Risk and Controls register and management reports.

We will ensure a quality assurance process is implemented for the Employer Services Team and adherence is monitored on a regular basis.

We will ensure the issues identified in Finding E above are including in the quality assurance checks for amendments.

Priority	2	<b>SWAP Reference</b>	435	
Responsi	ble Officer	Head of Wiltshire Pension For and Employer Services Mana (once in post), and Mem Services Manager		
Timescal	e	30/04/2023		
Revised 7	Гimescale	30/09/2023		

#### January 2024 Update

The Fund has stated 90% progress against this action however, there was not enough evidence available at the time of this follow up to enable us to verify this assessment. We were informed that a more comprehensive peer review arrangement, built into checklists is being implemented as a replacement for sample reviews. Further detail around what quality assurance work is being developed would also be required.





Finding	Action	Перінд	organisations to succeed	
L: Pensions Payroll Reconciliation Project				
There has been an ongoing Payroll Reconciliation Project in the Fund as it became apparent that pensions payments to members were not always paid at the current rate. This was due to recording differences between the Pensions system, Altair, and the Council's payroll system, SAP. The work to rectify the differences has now been outsourced to a third party however, our review noted there were 35 outstanding cases still sat with the Fund to resolve. We were advised the following:	We will ensure the issues noted with the 35 outstanding cases still sat with the Fund are resolved.			
• 11 cases are not in the correct payroll area and they need to be altered by the Payroll Team, but the Payroll Team had not been informed of this;				
<ul> <li>4 cases have an issue on Altair which need to be resolved (not payment related); and</li> </ul>		•		
<ul> <li>20 cases have payment discrepancies that need to be resolved.</li> </ul>	Priority 1	SWAP Reference	436	
We were informed that no deadlines had been set to resolve the above issues and their resolution was not being formally monitored by management.	Responsible Officer	Head of Wiltshire Pension Fund and Operations Manager		
	Timescale 31/03/2023			

### January 2024 Update

The Fund has stated 100% progress against this action and we have been informed that all 35 cases have been dealt with. However, evidence to verify this assessment was not made available during the review.





Finding	Action			
M: Pension Fund's Risk and Controls Register				
Since our previous audit the Fund has introduced a Risk and Controls Register which is reviewed monthly to help determine if controls are operating effectively. The controls are linked to a list of risks to help determine a risk score.	We will continue to embed the Risk and Controls Register and formally address managers performance when controls are not updated ahead of the monthly risk and controls meeting.			
Each month it is the managers responsibility to document and evidence in the Risk and Controls Register if their controls for the month have been completed. We reviewed the minutes and registers from previous meetings and noted that not all managers have been updating the register and as such the output on corresponding risks is not accurate.	Priority	2	SWAP Reference	437
	Responsible Officer		Head of Wiltshire Pension Fund	
	Timescale		31/03/2023	
January 2024 Update				

We agree with the Fund's assessment of 100% progress made against this action and note that this action may now be closed.

However, having reviewed the risk register, we would advise some additional minor changes going forward.

- Basic training for officers on risk and control wording to ensure consistency throughout; and
- A 'last reviewed' column is added so it is clear when risks become overdue.