Consolidated Action Plan - Update

Consolidated Pensions Administration Action Plan	Completed / Resolved	Red	Amber	Green
		(Number of acti	ons in brackets)	
Knowledge & Understanding	(5) A training day was delivered to LPB members in Oct-19. A training log is being maintained, and a schedule of external conferences has been shared with LPB.LPB meetings are now scheduled quarterly. Two further training days are planned for 7 th May and 7 th October.	(1) Training Needs Analysis to be finalised to agree content of 2020 training days.	(1) Training for new LPB member to be arranged, once appointed.	(0)
Conflicts of Interest	(0)	(1) Policy to be updated. Draft is on this LPB agenda for comments, prior to seeking approval from Staff and Pensions Committee.	(0)	(0)
Publishing Information	(0)	(2) LPB ToRs have been reviewed and revised draft is on this LPB agenda. Draft ESG policy is also on this LPB agenda for comments prior to approval by Pension Fund Investment Sub-Committee.	(0)	(0)

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	(Number of actions in brackets)			
Managing Risks	Instead of ICT presenting cyber security policy to LPB, this will be done by Pensions staff having liaised fully with ICT colleagues. This is a TPR developing area but not currently a requirement. Proposal is to report to LPB during summer 2020. Risk Register now a standing item on Forward Plan.	Finance restructure will increase capacity and create new Technical Specialist role. Recruitment is underway for vacancies; Technical Specialist and interim Pensions Admin Delivery Lead are in post.	(0)	Outcome of audits to be reported to LPB (not due until Staff & Pensions Committee have considered). Interim Delivery Lead is leading continuous improvement of procedures for managing risk. Service is liaising with WCC to understand its cyber security policy and will present proposed Pensions cyber security policy later this year.

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Record Keeping	Breach regarding Annual Benefit Statements was reported to TPR and actions required to remedy have been documented and implemented.	Project proposal for i-Connect has been approved and Full Business Case is in development. Pensions Admin Strategy is on this LPB agenda for comments prior to approval by Staff & Pensions Committee. Use of KPIs for performance management is being embedded into service and independent	Draft Data Quality Improvement Plan has been produced. Backdated Data Changes report to be run to ensure all historic changes have been captured. Queries are being captured and updated continuously and used to undertake Root Cause Analysis to reduce issues at source. SLA between Pensions Admin & Employer Payroll services has	(2) Data quality checks are planned in run up to Annual Benefit Statement and Annual Returns deadlines.
		expert is advising on other potential measures, based on best practice.	been drafted in line with TPR Code and will be rolled out to all employers.	

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Maintaining Contributions	Plan to resolve outstanding WCC Payroll issues was produced, including actions from internal audit, responsibilities and process for escalation. Timetable for information requirements from WCC Payroll is agreed and being met, with monitoring arrangements in place. Pensions / WCC Payroll Working Group ToRs now include Fire Pensions.	Introduction of charges to employers who fail to make contributions on time is being introduced as part of Pensions Admin Strategy (see separate report on this agenda).	(2) SLA is being finalised and will be rolled out to all employers to ensure they understand their roles and responsibilities in progress. Use of Root Cause Analysis to resolve issues at source is underway.	(1) Measures will be introduced to assess employer covenants once new staffing structure and capacity is in place.
Providing Information to Members	(0)	(0)	(0)	(0)
Internal Dispute Resolution	(0)	(0)	(0)	(0)

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	(Number of actions in brackets)			
Reporting Breaches of the Law	(6) Breaches Policy has been approved by Staff & Pensions Committee. Breaches log is updated continuously and reviewed regularly to identify and consider potentially reportable breaches. Annual Allowance training sessions have been run both for staff and for members at risk of exceeding annual or lifetime allowance thresholds.	Pensions Admin Strategy sets out employers' responsibility to report breaches to Scheme Administrator (see separate report on this agenda).	(0)	(1) Annual allowances will be monitored throughout year – new procedures being put in place.
TPR Developing Areas	(1) Voting activity is now being reported to LPB elsewhere on this agenda.	(1) Draft Climate Change Strategy is included elsewhere on this agenda for comments, prior to approval by Pension Fund Investment Sub-Committee.	(0)	(0)
Total Actions	23	13	10	8