

Progress Update on Agreed Management Actions

Appendix A

Table 1: Progress Updates on Actions Agreed from Internal Audit Reviews

Audit Review Title	Report Issued Date	Finding / Implication	Progress Update	Officer Responsible and Timescale
End to End Interfund Transfer In 2022/23 - Interfund Transfer Process Delays	May 2023	<p>Delays in the interfund process may impact on the member's ability to transfer their previous pension rights and impact on the benefits available to them when accessing their pension.</p> <p>A review of the reminder process is required which will consider the frequency of reminders issued, content within standard reminder documentation and how reminders are evidenced on the UPM system to provide for a complete audit trail.</p>	<p>The reminder process review has now been completed.</p> <p>The outcomes evidence that many of the delays are relating to delays in employers providing information. Whilst we have no control over the ceding schemes processes, action is being taken to assess how these issues can be escalated with the employers via engagement.</p> <p>The target has been extended to allow time to put a robust escalation process in place along with the following actions:</p> <ul style="list-style-type: none"> <li>• Review of the wording within the reminders to ensure employers are aware of the impact being caused due to no response.</li> <li>• Communication to the benefit teams to ensure all reminders are processed as new ones so we have evidence of the dates they were sent.</li> <li>• Further review of the intervals that reminders are be sent</li> </ul>	<p>Service Manager – Benefits</p> <p>Revised from September 2023 to December 2023</p>
End to End Interfund Transfer In 2022/23 - Lack of Escalation Procedure	May 2023	<p>A formal escalation route to report issues / concerns in relation to the receipt of pension contributions from the previous pension provider is required.</p>	<p>Pensions officers currently raise any issues around delays with their Team Leader or Service Manager and emails of this escalation are scanned to the members' file.</p> <p>There is however a lack of consistency in the timeframes for escalation, this will be addressed as part of the review of reminder intervals.</p>	<p>Service Manager – Benefits</p> <p>Revised from September 2023 to December 2023</p>

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Information Governance - Records Management / Document Retention Policy	2021 - updated by annual work programme of DPO	Although a Records Management Policy is in place, it is acknowledged that this is currently lacking a sufficient level of detail to make it a practical basis for determining document retention for the many different categories of records across the organisation.	<p>The initial draft suite of Data Protection documents was considered by SMT in September. Further amendments have been made in order to ensure distinct policies for scheme members and for corporate data protection.</p> <p>The breach process has been reviewed and a revised internal breach reporting form developed. This will be tested and then rolled out early in the new year.</p> <p>The review of the retention policy is scheduled to follow on from the above, however it is likely that, due to the large amount of work that will be required to carry out a robust review of this, the target date will need to be extended.</p>	<p>Head of Governance</p> <p>Revised from September 2023 to January 2024</p>
Pensions Admin System PIR - Improvement Plan	June 2023	An up-to-date Improvement Plan that captures all gaps and areas for improvement arising from the review of the Specification of Requirements is required to assist in monitoring delivery of agreed actions.	<p>Whilst the Improvement Plan and associated actions were being reviewed within the monthly account meetings, regulatory changes have impacted and delayed their implementation, these will be re-prioritised in the new year.</p> <p>The RAG rated actions in the plan were reviewed by the Interim Assistant Director – Pensions and the new Assistant Director- Pensions will continue to have oversight of these.</p>	<p>Service Manager - Pensions Systems</p> <p>Revised from September 2023 to January 2024</p>

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Pensions Admin System PIR - User Acceptance Testing	June 2023	Detailed and timely user acceptance testing is required to mitigate increasing the risk of adopting a system that is not fit for purpose and upon which to supplier has not fulfilled its contractual obligations.	<p>AMA: The work to be delivered by CIVICA on improvements to Monthly Data Collection and Aggregations is expected around August 2023. A plan and project management approach for UAT will be in place to ensure this is carried out promptly and properly documented in order to ensure the updates are rigorously tested and feedback provided to CIVICA as required. This UAT will involve the Systems team and relevant teams in Pensions Admin who are the main users of the processes being tested.</p> <p>Internally, any system improvements would be tested within 1 month of receiving a release with a focus on the changes mentioned in the release notes from CIVICA.</p> <p>The Database Management improvements require an update from CIVICA, which has been requested and is being monitored by the Head of ICT.</p> <p><u>Update:</u> The review of new MDC process has dropped down the list of priorities from both a CIVICA and SYPA perspective due to other work priorities. This will be a focus for the new year.</p>	<p>Service Manager - Pensions Systems</p> <p>Revised from September 2023 to January 2024</p>
PA - Pensions Savings Statements 2022/23 - I2 - Improvement Plan		An Improvement Plan that captures all issues / concerns arising from the annual Pension Savings Statement exercise is required to effectively manage and monitor delivery of agreed actions to full implementation and the Service's ability to address the concerns identified and complete the exercise by the deadline.	<p>The process has been dealt with in a timelier manner this year by working with the Benefits Team and employers to obtain pay figures and use estimated figures. This has enabled more cases to be processed by the deadline date.</p> <p>The target date has been changed to match the remainder of this project.</p>	<p>Team Leader - Support</p> <p>Revised from September 2023 to December 2023</p>

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Risk Management 2022/23 - Operational Procedures	August 2022	Lack of operational procedures and relevant training may result in uncertainty of roles and responsibilities, inconsistencies in processes, failure to adhere to requirements.	<p>AMA: As part of the plan to involve middle management in the risk management work, we will provide training and produce an operational guidance / procedure document for reference to complement and support the Risk Management Framework already in place.</p> <p><u>Update</u> The majority of this has been completed – specialist training was delivered to senior and middle managers together in September 2023. The risk management framework is in the process of being updated to reflect changes identified from the training and a full review of the strategic risk register was carried out in November 2023 involving middle managers as well as senior managers.</p> <p>The next stage is for middle managers to create their own Operational Risk Registers for each of the teams, which will be done on a phased basis.</p> <p>The Governance Team will aim to build their Operational Risk Register on Pentana to use as a template for other teams during January and February 2024.</p>	<p>Head of Governance</p> <p>Revised from September 2023 to February 2024</p>

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Table 2: Actions Fully Completed Since Last Report

Audit Review Title	Report Issued Date	Finding / Implication	Progress Update	Officer Responsible and Timescale
Pensions Admin System - LGPS User Group Action Log	June 2023	Failure to maintain an accurate and up to date Action Log, including the detailed actions required, by whom and when may result in a lack of clarity with regards to the actions required and a lack of a framework upon which these can be proactively managed, monitored and escalated where concerns arise.	Minutes and actions are now being taken in account meetings. A new Civica Account Manager has been appointed and we continue to work with them to progress actions.  <b>AMA Completed</b>	Service Manager - Pensions Systems  Completed September 2024

Table 3: Actions Added Since Last Report

Audit Review Title	Report Issued Date	Finding / Implication and Agreed Actions	Officer Responsible and Timescale
Procurement Compliance - Procurement Governance Framework	October 2023	<p>Guidance requires updating to mitigate the risk of not complying with legislative requirements and ensure a consistent approach be applied to procurement processes undertaken.</p> <p>AMA: A gateway approval document has already been created and is now being piloted. The Contract Standing Orders will be further updated as required to reflect the introduction of the Gateway Approval Document and to incorporate best practice requirements.</p> <p>Procurement guidance will be updated to ensure alignment with the revised CSOs and the Gateway approval document which will incorporate the standard templates required to facilitate and guide staff to follow the correct procurement procedures.</p>	Team Leader – Governance January 2024

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Procurement Compliance	October 2023	<p>Further assurance that legislative and regulatory requirements are in place mitigate the risk of supplier challenge.</p> <p>AMA: The Equality Impact Assessment and Data Protection Impact Assessment templates have already been developed and are currently being taken through a formal approval process internally before being included in the gateway approval document.</p> <p>The gateway approval document includes a form to evidence decisions made and the revised guidance will include the requirement for tender evaluation to be undertaken by a minimum of 2 officers.</p>	Team Leader – Governance January 2024
Procurement Compliance - Contract Register Format and Monitoring Arrangements	October 2023	<p>Risk of non-compliance with the requirements of the Local Government Transparency Code and ICO Model Publication Scheme as the YORTender contracts register is not in the recommended format per the Transparency Code.</p> <p>AMA: South Yorkshire Pensions Authority are not included in the scope of the LG Transparency Code although we do aim to meet its requirements as best practice. We have to use YORTender as our main contracts register as it is our system for contracts and procurements. Nevertheless, we will review and consider whether it would be useful to additionally publish contracts register information with any further details required separately on our website.</p> <p>The contracts register will be subject to enhanced monthly monitoring and management moving forward to ensure the accuracy of data / information publicised (i.e., contract values, durations including options to extend reconciled to contract documentation) for both new and existing contracts.</p>	Team Leader – Governance January 2024