

The Pensions Regulator Supervisory Report to the West Midlands Firefighter Pension Scheme Manager and Pension Board

Recommendations – Action Plan

*****Please note this action plan is in draft and may be subject to further changes and additions*****

Ref	Date	Subject	Action	Responsible	Completion date / Suggested timeframe	Status [Ongoing / Completed]
A	01/11	Pension Board Training and skills	PB to develop a formalised written training plan, reviewed at least yearly, which will cover emerging themes, such as cyber security. This will be published on a joint Pension Board filing system/Teams site (see Recommendation D1) to ensure all PB member can review as required and bring forward suggestions for training and development.	Pension Board	Implemented by February 2023	Ongoing
B1	01/11	Pension Board Training and skills	PB to develop a succession plan for both Scheme Member and Employer representatives, including undertaking a revision of role descriptions. This will include a proposal for hand-over between departing representatives and their replacements.	Pension Board	Implemented by March 2023	Ongoing
B2	01/11	Pension Board Training and Skills	PB to review its Terms of Reference for consideration by the Audit and Risk Committee (Scheme Manager) with regards to representative tenures to ensure these are staggered and include a suitable handover period.	Pension Board	Implemented by February 2023	Ongoing

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C	01/11	Pension Board Composition	Review appointment/election communications for Pension Board representatives to ensure that communications include information to encourage the widest possible number and range of candidates to apply.	Pension Board/Portfolio Team	Implemented by January 2023	Ongoing
D1	01/11	Pension Board Information Sharing	Implement a common Pension Board filing system/Teams site to enable Pension Board members to share relevant information and updates on a regular and ongoing basis between formal meetings.	Portfolio Team	Implemented by February 2023	Ongoing
D2	01/11	Pension Board Information Sharing	Scheme Manager to hold a session with Pension Board members to review information sharing arrangements and PB representatives' views on information sharing, knowledge and skills.	Scheme Manager	Held at March 2023 Audit and Risk Committee meeting	Ongoing
E1	01/11	Business Continuity Planning	Scheme Manager to receive a report on current Pension team BCP arrangements and testing and review their effectiveness with a view to making recommendations on their suitability.	Scheme Manager and Pensions Administration Team	Held at March 2023 Audit and Risk Committee meeting	Ongoing
E2	01/11	Business Continuity Planning	Pension Administration Team to develop and share with the Scheme Manager and Pension Board a set of procedural notes for key pensions administration tasks.	Pensions Administration Team	Completed by March 2023	Ongoing
F1	01/11	Information Sharing between SM, PB and Pension Administration Team	Written (rather than verbal) reports to be provided by the Pension Team on key issues to both the Pension Board and Scheme Manager as a standing item for all meetings.	Pensions Administration Team	To begin from March 2023 Audit and Risk Committee	Ongoing
F2	01/11	Information Sharing between SM, PB and Pensions Administration Team	Updates on key or urgent issues to be shared by Pensions Administration team on an ad-hoc basis into Pension Board joint Teams site/Filing system, and to Chair of Audit and Risk committee via email.	Pensions Administration Team supported by Portfolio Team	To begin from implementation of new filing/teams system as of February 2023	Ongoing

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G	01/11	Conflicts of Interest	Conflict of Interest Register, based on the TPR templated, to be created and stored on Pension Board filing system/Teams site where all PB members have access. Will be a standing item for all PB meetings. This document to be shared with The Pension Regulator.	Portfolio Team and Pensions Board	To begin from implementation of new filing/teams system as of February 2023	Ongoing
H	01/11	Risk Management	<p>Changes in formatting of the Risk Register to be made in line with TPR recommendations:</p> <ul style="list-style-type: none"> • utilising a cover sheet to provide a snapshot of the current risks, helping to clearly identify the current major risk(s) to the Scheme. The Scheme may wish to identify emerging risks in this location as well. • ensuring all risks have mitigating actions and owners • documenting closed risks <p>Incorporate relevant WMFS Corporate Risks within the PB Risk Register, to include Cyber Security (CR 7.3).</p>	Pensions Board RR subgroup	Completed by January 2023	Ongoing
I1	01/11	Digitisation of records	All records to be digitised and accessible to support data collection.	Pensions Administration Team	Completed	Completed
J	01/11	Data Improvement policy	Pensions Team to work with Data and Governance team on ensuring a Data Improvement Policy is in place for Pensions Data, either drawing on existing policy or developing a new policy if required.	Pensions Administration Team & Data and Governance Team	Completed by February 2023	Ongoing
K	01/11	Data Improvement Plan	Pensions Team, drawing on the Annual Data Review (Action L) to develop a Data Improvement Plan for any areas where data scores are not complete. This to be reported to both Scheme Manager and Pension Board and shared with TPR.	Pensions Administration Team	Following completion of Annual Data Review	Ongoing

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L	01/11	Annual data review	Pensions Team to undertake a pension data review, to assess the accuracy and completeness of member data, to be reported to the Pension Board and Scheme Manager.	Pensions Administration Team	Completed by January 2023	Ongoing
M	01/11	Recording data scores	Pensions administration team to record common and scheme specific data scores gathered as part of the Annual Data review (Action L) in Exchange.	Pensions Administration Team	Completed by January 2023	Ongoing
N1	01/11	Review of KPIs	Scheme Manager, working with Pensions Board, to review Key Performance Indicators	Scheme Manager, Pensions Board and Pensions Administration Team	Completed by February 2023	Ongoing
N2	01/11	Supporting narrative to KPs	All Key Performance Indicators to be accompanied by a written narrative (which may be provided alongside a verbal update). This narrative to be provided to both the Scheme Manager and the Pension Board	Pensions Administration Team	Completed by March 2023	Ongoing
O	01/11	Documentation of Data validation procedures	Pensions team to create a documented process for checking and validating data, to be shared with the Scheme Manager and Pensions Board, and reviewed annually.	Pensions Administration Team	Completed by March 2023	Ongoing
P	01/11	Pension Process Automation	Pensions Team to provide a report to the Scheme Manager on opportunities or limitations of automation within pension scheme processes for further consideration. Support to be provided by service digital and data team.	Pensions administration team & Digital and Data team	Completed by March 2023	Ongoing
Q1	01/11	Administrative Task Timescales	Pensions Team to provide a report to the Scheme Manager documenting expected administrative task timescales, to be shared with Pension Board.	Pensions administration team	Completed by March 2023	Ongoing

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Q2	01/11	Firefighter Pensions SAB Pensions Administration Strategy	Pensions Team to provide an update to the Scheme Manager on the Firefighter Pensions SAB Administration Strategy, and how it relates to the process used in the administration of the WMFPS.	Pensions administration team	Completed by March 2023	Ongoing
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