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SPPA

 Scottish Public Pensions Agency
 Buidheann Peinneanan
 Poblach na h-Alba

Meeting	Scottish Police Pension Board
Meeting date	28 August 2024
Meeting time	14:15
Meeting location	Remote - Microsoft Teams

Pension Board members	Shirley Rogers	Chair
	Steven Whalley	Vice Chair
	Andrew Barker	Pension Board Member
	Brian Jones	Pension Board Member
	Darren Paterson	Pension Board Member
	David Christie	Pension Board Member
	Lorna Cunningham	Pension Board Member
	Sharon Dalli	Pension Board Member
Scottish Public Pensions Agency (SPPA) attendees		Corporate Governance Manager
		Employer Relationship Manager
		Programme Director
		Head of People
		Strategic Communications Lead
		Chief Operating Officer
		Risk and Assurance Manager
		Chief Financial Officer
		Data Protection and Information Governance Manager
		Senior Project Manager
Apologies		SPPA Head of Strategy and Communications
		SPPA Risk & Control Officer
		SPPA Finance Transactions Branch Manager
Minutes		SPPA Corporate Governance Lead

1. Welcome and apologies

- 1.1 The Chair welcomed all attendees and noted apologies from SPPA Risk & Control Officer, SPPA Head of Strategy and Communications and SPPA Finance Transactions Branch Manager.
- 1.2 No new interests were declared.

2. Minutes of the previous meeting

- 2.1 SPPA agreed to review feedback from the Board on the previous minutes and amend the document accordingly.

3. Chief Executive Overview

- 3.1 SPPA are striving to improve service delivery. Due to budget constraints there is significant pressure on the Agency to prioritise essential work. McCloud Remedy project work, alongside business as usual, is the Agency's number one priority.

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3.2 A review of the Terms of Reference for Pension Boards is underway. The Agency are working to define the term provided by The Pensions Regulator 'assisting the scheme manager'. The Agency are hoping to create stronger links between Pension Boards and Agency Boards and hope to share a first draft on this work by December 2024.

3.3 The Board recognised the challenges the Agency are facing and offered support, which was welcomed by the CEO.

4. Update from Chair

4.1 There are a number of challenges which are common across all Pension Boards. The Chair suggested that quarterly calls with the CEO could be formatted differently to incorporate feedback from all schemes.

5. Operations

5.1 Quarter 1 has been challenging for the Agency, with a 24% increase in awards, year on year. Quarter 2 has been even more challenging to date.

5.2 Formal complaints remain low. The Agency are looking at themes around dissatisfaction and how to capture these in a 'lessons learnt' exercise.

5.3 The group discussed phone and email satisfaction and how SPPA might best deploy resource to balance customer responses. The Agency are planning to run a contact hub pilot, looking at how they can provide basic responses quickly and more technical responses through a call back system. An improved strategy for customer communication can be produced through this pilot and impending webform implementation.

5.4 The sample size for data is fairly small although this shows some positive trends of customers receiving what they needed.

5.5 Police Scotland colleagues noted a dip in retirement rates.

5.6 Some board members participated in a short life working group. It was noted the session was helpful and further engagement of this type would be welcomed.

6. Annual Events

6.1 Annual Benefit Statements (ABS) for those unaffected by McCloud Remedy are on track.

6.2 ABS / Remedial Service Statements (RSS) for those affected by McCloud Remedy will not be processed by 31st August 2024. They are on track to be issued mid-September 2024.

6.3 The Board noted support from Police Scotland and Scottish Chief Police Officers Staff Association for the Agency taking the time needed to produce accurate statements but noted impact to interest of any delay.

6.4 The group discussed communications to members. SPPA have:

- Updated the website
- Produced circulars
- Provided staff association colleagues with McCloud Remedy project packages
- Utilised tools on the website such as latest news functionality

6.5 The Board noted support for the messaging from SPPA and welcomed continued engagement. It was agreed that the SPPA website would be communicated as the single source of truth.

6.6 Annual Allowance Statements (AAS) for members unaffected by McCloud Remedy are on track.

6.7 AAS for members affected by McCloud Remedy are likely to be delayed. SPPA will engage with the Board when further details are available for this.

6.8 The Board noted some dependencies:

- HMRC digital service – currently nonfunctioning – due to function again in September

- Tax support
- 6.9 SPPA have worked closely with Police Scotland colleagues to utilise a function on pay slips and the intranet to encourage sign up to the online membership portal. 64% of McCloud Remedy eligible members are currently signed up to this service. SPPA shared appreciation for, and welcomed more of, Police Scotland's engagement.
- 6.10 For those members who require it, AAS will be sent by post.
- 6.11 The Chair noted an offline meeting led by SPPA around ABS/RSS was really helpful and further engagement of this type would be welcomed. The Board commended SPPA for communications work around the McCloud Remedy project.

7. McCloud Remedy Project

- 7.1 The immediate choice section of the project is on track. The Agency are waiting on HMRC to confirm payment charges.
- 7.2 The timeline for the immediate detriment section of the project is dependent on when HMRC confirm this information.
- 7.3 The Agency have been issuing RSS for the deferred choice cohort since October 2023. 600 awards have been issued to date.
- 7.4 Communications from members around the project remains high.

8. Pensions Platform Programme

- 8.1 Some of the work within the project has been placed on hold to further concentrate on McCloud Remedy project work.
- 8.2 The Agency are seeking support from the Scottish Government Digital Assurance team to understand how some aspects of the project can transition into business as usual.
- 8.3 There is an intention to rationalise pensioner pay dates but this needs further work.
- 8.4 A conditional data dashboard is in development and is due to be implemented in October 2024.

There was a short break 15:30 - 15:40.

9. External Engagement

- 9.1 The SPPA Strategic Communications Lead set out priorities for the communications team over the coming months and welcomed feedback from Board members.
- 9.2 A co-ordinated campaign is being developed to increase member portal sign up rates across all schemes.
- 9.3 The current website format was implemented through user centred design work with members. A plan is being developed to improve areas of low satisfaction.

10. Risk

- 10.1 A new risk was highlighted relating to financial software.
- 10.2 This risk is sitting on the Scottish Government risk register, as well as that of the SPPA Executive Team. The CEO noted confidence that this risk is being managed appropriately and the current RAG status is likely to reduce in the coming weeks.
- 10.3 The Board noted positive improvements to the risk register and sought general assurance on controls. The CEO provided assurance that although some risks remain with a red RAG status, this is the nature of the climate at the moment and they are being managed appropriately.

11. Data Protection

- 11.1 There were no reportable data breaches or cyber incidents over the last quarter.
- 11.2 The Agency recently held cyber security awareness training sessions for staff.

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- 11.3 The Board queried the level of personal data required for certain communications from SPPA via email. The SPPA Data Protection and Information Governance Manager agreed to follow this query up and provide a response to the Board offline.
- 11.4 The SPPA Data Protection and Information Governance Manager re-assured the board around contract management, noting:
- There are currently 6 key contracts that handle data.
 - All suppliers are asked to provide cyber essentials certification, ISO certification and other assurance documents.
 - SPPA utilise a checklist throughout contract durations to ensure information is being processed in the way that has been agreed via contracts, and to keep a record of up to date data protection leads in organisations.
 - Under Article 28(3) of the General Data Protection Regulation (GDPR) the contract between the controller and processor must offer an equivalent level of protection for personal data. Suppliers are obligated to comply with this regulation.
 - Scottish Government contracts (which SPPA utilise) have standard terms and conditions that cover data protection.
 - SPPA carry out due diligence when procuring new suppliers through a rigorous procurement process including impartial scoring.
 - Suppliers are expected to carry out penetration testing which shows improvements that need to be made to systems, as well as highlighting mitigations and controls.
 - Contracts also include a clause around independent testing.
- 11.5 Cyber security / data protection training is planned for Pension Boards in 2024. This will cover how Pension Boards can be more careful with data.

P0824.01	SPPA to review the level of personal data required for emails circulated to members encouraging sign up to the online members portal
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12. Corporate Governance

- 12.1 The SPPA Corporate Governance Manager provided an update on the Agency's latest position in complying with The Pensions Regulator (TPR) Code of Practice and noted new modules in the General Code.
- 12.2 The Agency have an internal tracker to monitor compliance. This is not reviewed by The Pensions Regulator, although would be should TPR decide on supervision.
- 12.3 The group discussed breach reporting. SPPA provide TPR with a comprehensive rectification plan when submitting breach reports, and further information when requested for any follows ups.
- 12.4 The Board asked for an update on a breach reporting policy and further clarification around estimates and backdated pay awards.

P0824.02	SPPA to provide an update on breach reporting policy
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13. Finance

- 13.1 The SPPA Chief Financial Officer provided an overview of financial performance in the last quarter noting overpayments.
- 13.2 The Board requested that underpayments be reported going forward. SPPA agreed to review TPR requirements around reporting on under payments.

P0824.03	SPPA to provide an update on financial figures – reconciling the year to date figures with age outstanding data on overpayments
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P0824.04	SPPA to review The Pensions Regulator General Code and assess whether it's a requirement to report underpayments to the Pension Board
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14. Horizon Scanning

- 14.1 No live consultations are planned for the scheme.
- 14.2 In the forthcoming UK budget discussions, there is a suggestion around changing pension tax positioning.

15. Any Other Business

- 15.1 SPPA held sessions for the Board in July and August where annual exercises were discussed. The full governance structure did not apply to these sessions as they were interim updates and not extraordinary meetings, so minutes will not be uploaded to the SPPA website. The Chair noted the sessions were very useful.

16. Review of Outstanding Actions

- 16.1 The following actions were approved for closure:

P0624.01 P0624.02 P0624.06 P0624.08 P1123.03
P0624.03

P1122.07 and P0624.05 were approved for closure pending wider circulation of the relevant information.

- 16.2 New target dates and updates should be provided for the following actions:

P0624.07 P0224.14 P0624.04 P0624.09

17. Next meeting

- 17.1 The Chair thanked all in attendance and closed the meeting at 16:58.
- 17.2 Next meeting – 3 December 2024

Summary of new Actions

P0824.01	SPPA to review the level of personal data required for emails circulated to members encouraging sign up to the online members portal
P0824.02	SPPA to provide an update on breach reporting policy
P0824.03	SPPA to provide an update on financial figures – reconciling the year to date figures with age outstanding data on overpayments
P0824.04	SPPA to review The Pensions Regulator General Code and assess whether it's a requirement to report underpayments to the Pension Board

Version Control		
		Version number
Date minutes sent to chair	18 September 2024	V1.0
Date approved by chair	19 September 2024	V2.0
Date approved by Board/committee	14 October 2024	V3.0
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