



West Midlands Pension Fund

West Midlands Pension Fund ICO Controller Checklist

Topic	Detail	Action	Evidence Provided
Lawfulness, fairness and transparency			
	Information we hold	The West Midlands Pension Fund has conducted an information audit to map data flows	The Fund has published on its website data maps which note the journey of our members' data through the Fund. These are available at www.wmpfonline.com/datamaps
		The West Midlands Pension Fund has documented what personal data we hold, where it came from, who we share it with and what we do with it	The Fund has published on its website a fair processing/privacy notice which details who we share information with and what information we hold. Further information is available at www.wmpfonline.com/dataprotection
	Lawful basis for processing personal data	The West Midlands Pension fund has identified a lawful basis for processing data.	The Local Government Pension Scheme ("LGPS") in England and Wales is an occupational pension scheme registered under section 153 of the Finance Act 2004 and its rules are currently set out in The Local Government Pension Scheme Regulations 2013 (SI 2013/2356) as amended (" LGPS Regulations "). The LGPS is administered locally by administering authorities which are defined in Regulation 2 of the LGPS Regulations and listed in Part 1 of Schedule 3 of the LGPS Regulations. Wolverhampton City Council (" Administering Authority ") is an administering authority under the LGPS Regulations. The Administering Authority manages and administers the



**West Midlands Pension Fund
ICO Controller Checklist**

			<p>West Midlands Pension Fund within the LGPS (the “Fund”) in accordance with its statutory duty under Regulation 53 of the LGPS Regulations.</p> <p>More information about the Fund’s lawful basis for holding information can be found in the Fund’s Data Protection Policy, available at www.wmpfonline.com/dataprotection</p>
	Consent	The West Midlands Pension Fund has reviewed how we ask for and record consent	<p>As a statutory occupational pension scheme, the West Midlands Pension Fund does not require consent of its members to hold their data, we do however obtain consent where any use of their information could be considered over and above the statutory requirement.</p> <p>More information is available on www.wmpfonline.com/dataprotection</p>
	Consent to process Children’s personal data for online services	The West Midlands Pension Fund hosts an online self-service platform, Pensions Portal	<p>As a statutory occupational pension scheme, the West Midlands Pension Fund does not require consent of its members to hold their data, we do however obtain consent where any use of their information could be considered over and above the statutory requirement.</p> <p>More information is available on www.wmpfonline.com/dataprotection</p>



**West Midlands Pension Fund
ICO Controller Checklist**

Individual's Rights			
	Right to be informed including privacy information	The West Midlands Pension Fund has provided privacy information to individuals	More information can be found at www.wmpfonline.com/privacynotice
	Communicate the processing of children's personal data	The West Midlands Pension Fund hosts an online self-service platform, Pensions Portal	As a statutory occupational pension scheme, the West Midlands Pension Fund does not require consent of its members to hold their data, we do however obtain consent where any use of their information could be considered over and above the statutory requirement. More information is available on www.wmpfonline.com/dataprotection
	Individual rights	The West Midlands Pension Fund has a process to recognise and respond to individuals' requests to exercise their rights under GDPR	More information can be found at www.wmpfonline.com/dataprotection
Accountability and Governance			
	Accountability	The West Midlands Pension Fund has an appropriate data protection policy	More information is available at www.wmpfonline.com/dataprotection
		The West Midlands Pension Fund	The Fund has in place an effective compliance monitoring program which



**West Midlands Pension Fund
ICO Controller Checklist**

		monitors our compliance with data protection policies and regularly reviews the effectiveness of data handling and security controls	is reported to committee on a quarterly basis.
		The West Midlands Pension Fund provides data protection awareness training for all staff.	All new employees are required to undertake an induction with the Fund's governance officer which covers Information Governance as well as completing an online mandatory E-Learning module on Protecting Information.
	Processor contracts	The West Midlands Pension Fund has a written contract with all processors and service providers	More information and an example agreement is available on the Fund's website www.wmpfonline.com/dataprotection
	Information risks	The West Midlands Pension Fund manages information risks in a structured way so that management understand the business impact of personal data related risks and manages them effectively.	The Fund has a risk management policy available on its website www.wmpfonline.com.corporateinformation as well as an Information Governance Framework. Copies of the framework policies are available at www.wmpfonline.com/dataprotection
	Data Protection by Design	The West Midlands Pension Fund has implemented appropriate technical and organisational measures to	The Fund has an Information Governance Framework. Copies of the framework policies are available at www.wmpfonline.com/dataprotection



**West Midlands Pension Fund
ICO Controller Checklist**

		integrate data protection into our processing activities	
	Data Protection Impact Assessments	The West Midlands Pension Fund understands when we must conduct a DPIA and have processes in place to action this	Copies of the Fund's DPIAs are available on its website at www.wmpfonline.com/privacyimpactassessment
	Data Protection Officer	The Fund has nominated a Data Protection Officer	The Fund's Data Protection Officer is Rachel Howe, Head of Governance and Corporate Services Please email Wmpfdataprotectionofficer@wolverhampton.gov.uk
	Management and responsibility	Decision makers and key people within the West Midlands Pension Fund demonstrate support for data protection legislation and promote a positive culture of data protection compliance across the Fund	Data Protection is a static agenda item on all pension committee and pension board meetings. It is monitored quarterly by the Senior Management Team.
Data Security, internal transfers and breaches			
	Security Policy	The West Midlands Pension Fund has an information security policy supported by appropriate security measures.	The Fund has an Information Governance Framework. Copies of the framework policies are available at www.wmpfonline.com/dataprotection



**West Midlands Pension Fund
ICO Controller Checklist**

	Breach notification	The West Midlands Pension Fund has effective processes to identify, report, manage and resolve any personal data breaches	<p>The Fund has a data breach process and this is outlined in the Fund's data protection policy</p> <p>A copy of the Fund's data protection policy can be found at www.wmpfonline.com/dataprotection</p>
	Internal transfers	The West Midlands Pension Fund ensures an adequate level of protection for any personal data processed by others on our behalf that is transferred outside of the EU	<p>The Fund requires all processors to enter into a data sharing agreement which requires all processors to provide an assurance statement as to their management of data</p> <p>A copy of the template agreement can be found on the Fund's website www.wmpfonline.com/datasharing</p>