



**West Midlands Pension Fund (“The Fund”)
ICO Controller Checklist**

Topic	Action	Evidence Provided
Lawfulness, fairness, and transparency		
Information we hold	The West Midlands Pension Fund has conducted an information audit to map data flows relating to the for different membership statuses and data sharing relationships at the Fund.	<p>The Fund has published on its website data maps which note the journey of our members’ data through the Fund.</p> <p>These are available at Privacy Notice West Midlands Pension Fund (wmpfonline.com)</p>
	The West Midlands Pension Fund has documented what personal data we hold, where it came from, why we collect it, who we share it with and what we do with it	<p>The Fund has published on its website a privacy notice which details who we share information with, what information we hold and where we collect it.</p> <p>Further information is available at Data Protection West Midlands Pension Fund (wmpfonline.com)</p>

<p>Lawful basis for processing personal data</p>	<p>The West Midlands Pension Fund has identified a lawful basis for processing data to provide pension services to members</p>	<p>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”).</p> <p>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.</p> <p>City of Wolverhampton Council (“Administering Authority”) is an administering authority under the LGPS Regulations.</p>
<p>Consent</p>	<p>The West Midlands Pension Fund has reviewed how we ask for and record consent.</p>	<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 beyond the scope of our statutory function.</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.	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 beyond the scope of our statutory function. More information is available on www.wmpfonline.com/dataprotection
Individual's Rights		
Right to be informed including privacy information	The West Midlands Pension Fund has provided privacy information to individuals in our privacy notice listed on our website.	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 recognize and respond to individuals'	Data subject individual rights are covered in the Fund's privacy notice. More information can be found at www.wmpfonline.com/dataprotection

	requests to exercise their rights under GDPR.	
Accountability and Governance		
Accountability	The West Midlands Pension Fund has an appropriate data protection policy that outlines the Fund's compliance with Data Protection Laws.	More information is available at www.wmpfonline.com/dataprotection
	The West Midlands Pension Fund monitors our compliance with data protection policies and regularly reviews the effectiveness of data handling and security controls	The Fund has in place an effective compliance monitoring programme which is reported to committee on a quarterly basis.
	The West Midlands Pension Fund provides annual data protection awareness training for all staff.	All new employees are required to undertake an induction with the Fund's Governance and Risk Lead which covers Information Governance, Cyber Security 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 are available upon request.
Information risks	The West Midlands Pension Fund manages	The Fund has a risk management policy as well as an Information Governance Framework. A copy of the Data

	information risks in a structured way so that management understand the business impact of personal data related risks and manages them effectively.	Protection Policy is available on the website, with wider Information Governance policies available upon request. Data Protection Policy are available at: Data Protection West Midlands Pension Fund (wmpfonline.com)
Data Protection by Design	The West Midlands Pension Fund has implemented appropriate technical and organizational measures to integrate data protection into our processing activities.	The Fund has an Information Governance Framework. More information, available at: www.wmpfonline.com/dataprotection
Data Protection Impact Assessments	The West Midlands Pension Fund understands when required we must conduct a DPIA and have processes in place to action this.	This Copies of the Fund's DPIAs are available upon request
Data Protection Officer	The Fund has nominated a Data Protection Officer.	The Fund's Data Protection Officer is Rachel Howe, Head of Governance, Risk and Assurance. Please email: Wmpfdataprotectionofficer@wolverhampton.gov.uk
Management and responsibility	Decision makers and key people within the West Midlands Pension Fund demonstrate support and compliance of data protection legislation and promote a positive culture of data	Data Protection reporting is covered under a static agenda item on all Pension Committee and Local Pension Board meetings. It is monitored quarterly by the Senior Management Team.

	protection compliance across the Fund.	
Data Security, internal transfers, and breaches		
Security Policy	The West Midlands Pension Fund has an information security policy supported by appropriate security measures.	Governance Framework. More information, available at: www.wmpfonline.com/dataprotection
Breach notification	The West Midlands Pension Fund has effective processes in place to identify, report, manage and resolve and remedy any personal data breaches	The Fund has an Information Incident reporting process, and this is outlined in the Fund's data protection policy. A copy of the Fund's data protection policy can be found at www.wmpfonline.com/dataprotection
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.	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. A copy of the template agreement can be provided upon request.