

PASA Standards

Change Control
October 2021

Operational Controls and Procedures

Standard:

3.3 Change Control

PASA expects administrators have a fully documented change control procedure covering both major and minor changes to administration procedures and controls

Rationale:

Administration teams need to be able to deliver change without affecting normal service delivery. This is of increasing importance given the move to increased remote working of administration teams.

PASA does not expect administrators to undergo change for changes sake; however proactive identification of changes required is advantageous.

PASA does expect administrators to ensure procedures and mechanisms are in place to be able to deliver change (both business and arrangement change) without this affecting normal service delivery and ensure systems and processes are legislatively compliant. Administrators need to ensure their change procedure is robust and readily available across their organisation. It is a requirement changes are looked at in a logical manner across an organisation, and not in silos, ensuring the correct changes are carried out business-wide where required. Where the scope of change is unclear (whether legislative or business change) PASA expects administrators to demonstrate they have procedures in place to manage the risk of scope change.

General Principles:

PASA expects applicants for accreditation to be able to demonstrate:

- They have a process for identifying and recording changes identified in the business;
- They are reporting on the results;
- They have procedures in place to ensure service levels are undisrupted or there are contingency plans if services are likely to be disrupted as a result of the planned change;
- Any change request has a documented change plan where changes are identified, fully scoped, risk assessed, a delivery plan documented and signed off, resources allocated and the outcome of the change plan evidenced. Specifically testing outcomes from any process or calculation change should be retained and documented for the purpose of future audit and evidence of control. It is vital any change requests are managed ensuring service levels are undisrupted and maintained throughout the change life cycle;
- All change requests must be documented as outlined above - it is suggested these requests are signed off (agreed or rejected);
- All change requests, regardless of the outcome, should be captured, recorded and reported on throughout the change life cycle;
- All changes carried out should be planned not to disrupt the normal service delivery, where applicable;
- All change activity has a clear and regular governance review to ensure administrators and key stakeholders will receive progress reports on their change requests throughout the change lifecycle;
- If a change is implemented this will have passed appropriate quality measures, and the final change will be signed off by the senior user and project sponsor;
- Any lessons learnt from the change will be appropriately documented for future change initiatives or activities of Business As Usual (BAU).

Fundamentally:

- Change and BAU are clearly defined and separated in the operational environment either through structure or resource planning and allocation;
- Controlled, and fully documented and auditable changes can be implemented throughout the administration environment;
- Impact analysis should be undertaken prior to any change being undertaken;
- Defined changes are scoped, risk assessments undertaken, mitigating strategies agreed and a delivery plan documented;
- Independent sign off is obtained before any change progresses, where applicable;
- BAU Service levels are maintained throughout a change process;

- Specific Service levels, management information and governance boards, panels exist for change programmes, with supporting approval bodies in place;
- Independent management information is provided to track changes in flight;
- Routine changes such as actuarial factors to have a defined change and sign off process.

Outcomes:

Administrators implement change seamlessly, accurately and without disruption to normal service.

Measures/Evidence

- Major changes should have documented change plans, where changes are identified, scoped, risk assessed; a delivery plan documented and signed off; resources allocated and the outcome of the change plan evidenced. Specifically testing outcomes from any process or calculation change should be retained and documented for the purpose of future audit and evidence of control
- There should be a formal process for documenting minor changes as appropriate
- Undisrupted service levels are demonstrated through reporting to governing bodies¹ (refer to Standard 2.1 dealing with reporting);

¹ Governing Bodies should include, as appropriate, Trustees, Trustee Boards, Governance Committees and Boards and others charged with the oversight of the administration service delivery

Accreditation Approach

For TPAs and in-house teams:

PASA expects TPAs with multiple arrangements to take a reasonable approach involving:

- A standard documented approach to all arrangements within the TPA
- A dedicated change process

The accreditation team will:

- Ask for evidence of a controlled change management process (all changes within the business or for clients scoped, agreed and appropriate change governance in place)
- Look for evidence the results are reported to the business or governing body(ies) as appropriate
- Look for evidence the results are acted upon

PASA expects in-house teams to follow the same principles for change management as apply to TPAs. The accreditation team will:

- Ask for evidence of a controlled change management process
- Look for evidence the results are reported to the trustees
- Look for evidence the results are acted upon

For Master Trusts and Annuity Providers:

PASA expects Master Trusts and Annuity Providers (including those with multiple arrangements) to take a reasonable approach involving:

- A standard documented approach to all arrangements within the Master Trust and Annuity Provider
- A dedicated change process

The accreditation team will:

- Ask for evidence of a controlled change management process (all changes scoped, agreed and appropriate change governance in place);
- Look for evidence the results are reported to the governing body(ies);
- Look for evidence the results are acted upon;

For TPA's, in house teams, Master Trusts and Annuity Providers the accreditation team will check:

Where some services are outsourced to a third party, that change control reporting and control information is supplied by the appointed party at the same level as applies to the delegating party.

Timelines

PASA expect these controls and procedures to be present, available and in use.



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PASA is a Community Interest Company and our full name is Pensions Administration Standards Association CIC.

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