ITEM No …5………..

REPORT TO: **PENSION SUB-COMMITTEE OF THE POLICY & RESOURCES COMMITTEE & PENSION BOARD – 17 OCTOBER 2022**

REPORT ON: **PENSION ADMINISTRATION PERFORMANCE – QUARTERLY UPDATE TO 30 JUNE 2022**

REPORT BY: **EXECUTIVE DIRECTOR OF CORPORATE SERVICES**

REPORT NO: **236-2022**

1. PURPOSE OF REPORT

This report provides information on the recent quarter's operational performance in relation to Pension Administration.

2. RECOMMENDATIONS

The Sub-Committee is asked to note the contents of the report.

3. FINANCIAL IMPLICATIONS

There are no direct financial implications.

4. BACKGROUND

This report focusses on statutory performance and is subject to ongoing development to provide enhanced reporting functionality to improve the quality of information on administration performance and compliance.

5. SERVICE SUMMARY

5.1. Summary of Statutory Performance Requirements

The following table summarises the performance of the fund administration against statutory requirements:

Category	Received			Completed				Average Days			
	Current	Prior	% change	Current	Prior	% change	Statute Days	Current	Prior	% change	Cases beyond statute 30/6/22
New Member	273	76	259%	349	0		60	30	0		
Estimate	212	204	4%	128	179	-28%	60	69	59	17%	7
Options	431	394	9%	331	290	14%	60	64	52	24%	37
Actual	221	276	-20%	203	284	-29%	60	19	17	12%	
TV In	35	36	-3%	19	38	-50%	60	28	53	-47%	
TV Out	128	147	-13%	140	96	46%	90	44	37	21%	
Deferred	342	267	28%	247	265	-7%	60	52	57	-9%	
Death	169	195	-13%	147	202	-27%	60	14	12	13%	
Death Grant	33	27	22%	27	32	-16%	60	55	63	-13%	
Dependant	58	75	-23%	69	70	-1%	60	37	28	30%	
Divorce	12	14	-14%	11	16	-31%	90	46	60	-23%	
Total	1717	1711	0%	1311	1456	-10%					44

The following provides further detail on statutory task data:

Overall Caseload:

- Although case volumes were lower than previous quarter, a small number of cases were out-with statute as noted above. During the quarter to June, the team have the following additional events that require administering:

  - Pension increase
  - Treasury revaluation
  - Annual accounts disclosures
  - Employer year end submissions and annual benefit statement processing.

In addition to the above, staff turnover also resulted in additional pressure during the quarter, and recruitment exercises are ongoing.

Covid Prioritised Tasks:

- **Issue of Pension Options & Pensions Brought into Payment**

  The team continues to give priority to the payment of benefits in line with TPR priorities. Over the period the following points are relevant:

  - Although a 11% reduction on combined caseload received, a 9% increase in Options for those entitled to receive payment of retirement benefits was received.
  - Although an increase of Options processed, the average case times fell out-with statute over the period, and there were 37 cases beyond statute at end of period.

- **Processing of Death Benefits, Payments of Death Grants, and Dependant Pensions**

  - A decrease of 13% of notified deaths were received over the period
  - Death Grant case complexity continues to result in fluctuating processing times and number of cases completed.

Other Statutory Tasks:

- **New Member Processing:** The introduction of IConnect in April 2021 had a significant effect of the number of new starters received since its introduction. The continuation of work with employers continues to result in a changeable number of new starts being processed.
- **Estimates:** Cases received during the quarter increased by 4%, With the introduction of the ability for members to process their own estimates via the Member Self Service Portal, these estimates are the more complex which cannot be processed via MSS by the member. A small number of cases were outstanding at the end of the quarter, and actions will be taken to rectify this with the next quarter.
- **Deferred Member Processing:** Staff turnover and delays in recruitment have reduced resources available. Despite this, the team were able to maintain statutory timeframes.
- **Outbound Benefit Transfers**: as with deferred member processing, this area was also affected by resource constraints, but statutory timeframes were maintained.
- **Inbound Benefit Transfers**: As per outbound transfers.
- **Divorces:** Case volumes processed remained stable in comparison to the previous quarter.

5.2. Other Pension Operations

The following table summarises the other operations undertaken in addition to statutory requirements:

	Received			Completed			Average Days		
Category	Current	Prior	% change	Current	Prior	% change	Current	Prior	% change

Amendment to Account	441	492	-10%	493	449	10%	40	15	168%
Certificates	34	18	89%	53	109	-51%	64	144	-56%
Other Admin Tasks	716	619	16%	782	763	2%	59	61	-3%
Other pensions processing	639	518	23%	485	521	-7%	96	234	-59%

5.3. Employer Contributions

During the quarter, there were 5 instances of late payment of monthly contributions, across 4 separate employers. The employers were contacted, and 3 of the employers reported that breach was as a result of staffing issues.

5.4. Annual Pension Increase and Treasury (CARE) Revaluation

The Pensions Increase (Review) Order was implemented to all pensions in payment and deferment wef 11th April 2022 and provided an increase of 3.1%. Both the Altair and Resourcelink systems had to be updated to reflect the change in pensioner, dependents and deferred pensions. The increase in pension in payment with effect from 11th April was £170,116.04.

Active CARE records were increased in line with the Treasury Order which provided an increase of 3.1% to all members. The Altair system was updated to reflect this following the upload of all 2021/22 year end data.

5.5. Employers and Member Online Portals

During the period all scheme employers made an IConnect upload.

Testing on the new bulk document uploader has continued, but has encountered issues due to member identification numbers which are not always unique. This is causing a large number of uploads to fail. It is hoped that over the next 6 months this will be able to be resolved and this service will be available to our pensioners through the member self-service portal.

As at 30th June 2022 registration to the Member Self Service Portal increased to 10412 from 8848 in the last quarter, an increase of 22.2%.

5.6 Employers submission of year end data

During the quarter employers submitted their year end data. This was uploaded into the Altair Pension System to enable updating of individual member records for items such as CARE pay for 2021/22, employee contributions paid 2021/22, and their Full Time Equivalent Pay for 2021/22. Employers were contacted for clarification or rectification where required, and guidance was provided to support employers who were encountering difficulties.

5.7 Accounts Disclosure Information

In the quarter Perth And Kinross, Dundee City Council, Angus Council, Tayside Contracts, Care Inspectorate and Scottish Social Services Council all submitted data for which pension, lump sum and transfer value data (Care Inspectorate and SSSC) was requested. All data was calculated, checked and returned to the employer for input into their annual accounts.

5.8 Call Centre

In the first full quarter of the call centre a total of 2920 calls were answered, which is a daily average of 45 calls.

Team members have reported that call quality has improved following the issue of new headsets, but there continues to some poor quality audio issues, and the team are engaged with IT to ensure best service provision for both callers and staff.

5.9 Prudential AVC

Disinvestment times remain as per the last quarter (approximately 4 weeks after the disinvestment instruction being issued). Scheme members and pension fund team members continue to report that telephone calls to the Prudential Customer Services Team still remain disappointing and unacceptable response times of in some cases of over 30 mins for calls to be answered.

The team continue to raise service issues with the corporate liaison management at Prudential.

5.10 Compliance

- **National Fraud Initiative (NFI):**

Currently awaiting contact from next of kin/relative for details provided on Death Certificates purchased in the 15 outstanding cases.

The next NFI exercise is in planning stages and staff training is planned for December.

- **GDPR:** During the quarter there were no recorded instances of a GDPR breach reported.

5.11 Recruitment

In June, an internal appointment to Senior Pensions Assistant Post created a vacancy for an additional Pensions Assistant, and due to timing of current recruitment drive, this was incorporated.

On 27th June 2022 recruitment interviews were held for the Pensions Assistant Posts. This was to recruit for 2 vacant Pensions Assistant Posts and 4 newly created posts. Unfortunately, of the 15 applications received, only 2 were selected as preferred candidates. A further recruitment exercise is underway.

On 28th June 2022 interviews were held for a Clerical Assistant Post and preferred candidate selected.

At the end of the quarter, staffing levels remained below establishment and recruitment exercises will continue in the next quarter.

OTHER ACTIVITIES

5.12 Queries & Complaints

- Approximately 4349 emails were received into the generic email account in the quarter to 30th June 2022, this equates to approximately 67 emails per working day over the quarter. Although the volumes reduced from the previous quarter (a reduction of 580 email messages), this however does not reflect emails received direct into staff email accounts.
- E mails continue to be a significant work allocation to all Pensions Assistants within the Team as they can require a considerable amount of time and review of member records to ensure that a full reply is provided.
- Over the quarter, there was one corporate complaint received. Following investigation, the complaint was upheld.

5.13 Carnoustie Golf Links

Following the exit of Carnoustie Golf Links the end of January 2022, communications are ongoing to ensure that the essential forms essential to close all members records are received. Whilst most members have now been advised of their benefits as at their last day of scheme membership, a small number of queries remain with the employer and their payroll provider.

5.14 Staff Training

- **Online pension surgery – transfers out**

Administering authorities received a notification from the LGA on 20 April 2022, inviting them to attend an online pension surgery on transfers out. The surgery was held on 12 May 2022 and provided a question and answer session. It provided practitioners with an opportunity to ask us any questions about their recently issued revised non-club transfers out guide. The team members involved in the transfer calculations attended this session and found it informative and useful.

- **LGA Training Courses**

In May and June 2022, the LGA provided Scottish Administering Authorities with two training courses on Aggregation and Transfers. These were provided both online via Microsoft Teams and also in a face to face environment. Staff from the Fund attended these courses and feedback was very positive with staff gaining a positive learning experience both from the presenter but also in the shared experiences of other Scottish Fund staff.

- **Pension System Providers Online Training Tool**

Training for new Clerical Assistants and Pensions Assistant utilising the Online Training Tool was undertaken in the period.

- **In House Training**

Face to face and Microsoft Teams based training was provided to the new employees carrying out Clerical Assistant and Pensions Assistant roles.

6 REGULATIONS

Details of regulatory matters are contained in Appendix 1.

7 POLICY IMPLICATIONS

This report has been subject to the Pre-IIA Screening Tool and does not make any recommendations for change to strategy, policy, procedures, services or funding and so has not been subject to an Integrated Impact Assessment. An appropriate senior manager has reviewed and agreed with this assessment (Ref: 447267151).

8 CONSULTATIONS

The Chief Executive and Head of Democratic and Legal Services have been consulted in the preparation of this report.

9 BACKGROUND PAPERS

None

ROBERT EMMOTT

EXECUTIVE DIRECTOR OF CORPORATE SERVICES **26 September 2022**

Appendix 1

REGULATORY COMMUNICATIONS

SPPA Circulars

On 10th May 2022 the SPPA issued a circular in relation to the miscellaneous amendments made to the current regulations. The circular can be found at https://pensions.gov.scot/sites/default/files/2022-05/LGPS_Circular_Miscellaneous_Amendments_Regulations_Scotland_2022.pdf

The changes include:

- **Election for payment of benefits upon attaining age 55**
  Clarification of the process by which early payment (election from age 55) is permissible for deferred and pension credit members. This was introduced into regulation wef 1st June 2018, but the 2022 Amendment Regulation provides clarification of certain policy issues.

- **Survivors Benefits**
  The 2022 Amendment Regulations change the rules on survivor pensions. In particular, the rules on what membership is when calculating survivor pensions in respect of membership before 1 April 2015.

  The changes are made in response to two court cases: Walker v Innospec and Goodwin v Department for Education. The changes place surviving same-sex civil partners, survivors of married same-sex couples and male survivors of female married members in a similar position to female survivors of male married members.

  The changes have effect for deaths occurring on or after 5 December 2005.

  The impact of this amendment requires a change in the Altair software to ensure that all future calculations are where appropriate past calculations are re0visited are calculated in accordance with this change. The LGA has confirmed that it will issue a technical guide to allow administering authorities with guidance as to what membership must be included when calculating survivor pensions in respect of membership before April 2015.

  The Scottish Public Pensions Agency confirmed the following in Circular 2022/04: "Where the recalculation of a partner's pension causes a reduction to the rate of an eligible child's pension, administering authorities will need to recalculate that child's pension and adjust future payments. We would not expect authorities to recoup past overpayments.

- **APC factors**
  The 2022 Amendment Regulations delete the requirement to base the APC amount on the member's gender. It is anticipated that GAD will issue new gender-neutral APC factors over the next few months.

- **Changes to actuarial valuations**
  The 2022 Amendment Regulations require valuations on both an ongoing and cessation basis. The regulations also require the rates and adjustment certificate for an employer to specify the amount of liabilities arising in respect of their members as at the valuation date, assessed on both an ongoing and cessation basis. The changes will apply from the next valuation as at 31 March 2023.

- **Termination assessments**
  Where an administering authority has obtained an actuarial valuation for an exiting employer, the 2022 Amendment Regulations limit its ability to obtain a revised valuation before the relevant payment is made. The regulations require that each valuation must remain fixed for 90 days. It is hoped that this change will provide exiting employers with greater certainty on the exit payment amount.

The 2022 Amendment Regulations also require administering authority to specify in a suspension notice the period during which it will apply. They may withdraw the notice earlier at their discretion.

- **Employer flexibilities**

  - **Deferred debt agreements**
    A deferred debt agreement is a written agreement between the administering authority and an exiting employer. Under the agreement, the employer's liability to pay an exit payment is deferred and the employer continues to pay secondary rate employer contributions
    .
    An administering authority may enter into a deferred debt agreement where:
    - the employer's last active member has left your fund,
    - policy on deferred debt agreements is specified in your funding strategy statement,
    - they have consulted the exiting employer, and
    - they have had regard to the views of an actuary appointed by you.

    The regulations further set out:
    - that the deferred debt agreement must provide for it to remain in place for a specified period
    - The period can be varied if you and the deferred employer agree
    - what must be in a deferred debt agreement
    - the circumstances when a deferred debt agreement ends
    - the employer's duties while a deferred debt agreement is in force.

  - **Amending employer contributions between valuations**
    For each fund valuation, you must obtain a rates and adjustment certificate prepared by an actuary. The certificate sets out the employer contribution rates for each year of the relevant three-year period.

    Currently, regulation 61(9) of the 2018 Regulations allows amendment of the rates and adjustment certificate between valuations in limited situations. For example, where an employer agrees to pay increased contributions to meet the cost of awarding additional pension.

    The 2022 Amendment Regulations amend the 2018 Regulations to provide you with a new discretion to be able to do so, but it will require an update to the funding strategy statement, setting out the policy on amending contributions between valuations.

    Once this is in place, authorities may exercise the discretion where:
    - it appears likely to you that the amount of the liabilities arising or likely to arise has changed significantly since the last valuation,
    - it appears likely that there has been a significant change in the ability of the employer (or employers) to meet scheme obligations, or
    - an employer (or employers) has requested a review of the employer contributions and has undertaken to meet the costs of the review.

    In revising the certificate, authorities must consult with the employer (employers) and have regard to the views of the actuary.

  - **Spreading exit payments**
    When an employer becomes an exiting employer, authorities must obtain:
    - an actuarial valuation as at the exit date of the fund's liabilities in respect of the employer's members, and
    - a revised rates and adjustment certificate showing the exit payment or exit credit due.

Where an exit payment is due, the employer must make the payment over such period as you consider reasonable.

The 2022 Amendment Regulations provide a discretion to spread the exit payment. To do this, authorities would need to obtain a revision to the rates and adjustment certificate. The revised certificate must show the proportion of the payment the employer will pay each year over such period as you consider reasonable.

Before authorities can exercise this, they must update their funding strategy statement, setting out your policy on spreading exit payments.

In revising the certificate, authorities must consult with the employer and have regard to the views of the actuary.

Wider Landscape

- **Proposed merger**
  Lothian Pension Fund and Falkirk Council Pension Fund have announced that they are exploring the possibility of a merger of their operations. The two funds have been working together for over a decade. Work to take this proposal forward will continue this year, subject to approval by the City of Edinburgh Council and Falkirk Council, and regulatory approval in Scotland and the UK.

- **HMRC Pension schemes newsletter 138**
  HMRC published Pension schemes newsletter 138 on 29 April 2022.

  The newsletter contains articles covering:
    - HMRC has updated its annual allowance calculator to include the 2022 to 2023 tax year
    - changes to Scheme Pays reporting deadlines in some cases following the introduction of the Registered Pension Schemes (Miscellaneous Amendments) Regulations 2022 (see Bulletin 223 for more information)
    - a reminder to act now to migrate your pension scheme to the Managing Pension Schemes service
    - accounting for tax returns for the quarter ending 31 March 2022 must be submitted through the Managing Pension Schemes service

- **HMRC - Managing pension schemes service newsletter April 2022**
  The newsletter set out that a new feature has been added to the Managing pension schemes service. The new feature allows administrators to migrate their schemes from the Pension schemes online service. The newsletter gave information the onboarding process as well as links to guidance. The newsletter also included information on:
    - recreating existing relationships on the Managing pension schemes service
    - adding new scheme administrators
    - authorising new practitioners
    - submitting Accounting for Tax (AFT) returns, pension scheme returns, and event reports on the Pension schemes online service
    - making payments for charges using the pension scheme tax reference number
    - updating information
    - future features that are expected shortly, such as bulk AFT reporting and updated financial information.

  Tayside Pension Fund fully migrated to the new service during April 2022.

- **The Pensions Regulator**
  TPR hosted a webinar on pension scams. The webinar gave:
    - details of the evolving pension scams landscape
    - information to support new duties to look for red and amber flags
    - details about the pledge to combat pension scams
    - updates from the Pension Scams Industry Group.

TPR has published a recording of the webinar on their website (https://www.thepensionsregulator.gov.uk/en/media-hub/speeches-and-speakers/pension-scammers-screw-up-lives-webinar)

- **Annual allowance changes**

The Government has changed the annual allowance rules. This has been done by section 9 of the Finance Act 2022 and the Registered Pension Schemes (Miscellaneous Amendments) Regulations 2022. The changes apply in certain situations where annual allowance calculations for previous years are retrospectively amended.

Where an employer becomes aware that information previously given was insufficient e new regulations require employers to provide further information to administering authorities. This will apply where an employer becomes aware that information they provided previously, for a Pension Input Period (PIP) falling within the 'relevant time', was insufficient to enable the authority to correctly calculate the annual allowance.

The 'relevant time' begins with the start of the tax year six years before the 'current tax year' and ends with the end of the 'current tax year'. The 'current tax year' means the tax year in which the employer became so aware. So, if this happens in tax year 2022/23, the following PIPs will fall within the relevant time:

  - April 2022 to 5 April 2023
  - April 2021 to 5 April 2022
  - April 2020 to 5 April 2021
  - 6 April 2019 to 5 April 2020
  - 6 April 2018 to 5 April 2019
  - 6 April 2017 to 5 April 2018
  - 6 April 2016 to 5 April 2017

The employer must provide the further information within three months of becoming aware the information was insufficient or, if later, on or before 6 July following the end of the relevant PIP. The further information must enable the administering authority to correctly recalculate the annual allowance.

The administering authority must recalculate the annual allowance for the relevant PIP. If the administering authority receives the further information from the employer for a PIP falling within the 'relevant time', it must recalculate the annual allowance. The 'relevant time' for this begins with the start of the tax year six years before the 'current tax year' and ends with the end of the 'current tax year'. The 'current tax year' for this purpose means the tax year in which the authority received the further information.

Administering authorities must also recalculate annual allowance amounts where there has been a change to the scheme rules. This will apply if the change results in a change to an annual allowance calculation for a PIP falling within the 'relevant time'. The 'relevant time' begins with the start of the tax year six years before the 'current tax year' and ends with the end of the 'current tax year'. The 'current tax year' for this purpose means the tax year in which the rule change is made.

After recalculating the annual allowance, if the member:

- exceeds the annual allowance for the relevant tax year - the administering authority must send a pension savings statement to the member. It must send this within three months of receiving the further information/the rule change being made or, if later, by the 6 October following the end of the relevant tax year. They must also send an event report telling HMRC within three months of the date they sent the statement to the member, or if later, by 31 January following the tax year to which the report relates. It is not relevant whether the administering authority had previously sent a pension savings statement for this period.

- does not exceed the annual allowance for the relevant tax year and the administering authority has previously sent a pension savings statement for that period, it must send an updated statement. It must send this within three months of receiving the further information/the rule change being made, or, if later, by the 6 October following the end of the relevant tax year.

Deadlines to make or amend mandatory scheme pays elections extended to allow members to make mandatory scheme pays elections by no later than 31 July in the year following that in which the 'relevant tax year' ends. 'Relevant tax year' means the tax year the member exceeded the annual allowance.

However, for members who received a pension savings statement as a result of a recalculation under step 2, this deadline will likely have expired. For these cases, section 9 of the Finance Act 2022 extends the deadline if:

- the administering authority gave the statement within the 'relevant time', and
- as a result of that statement, the member qualifies to elect for mandatory scheme pays.

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Relevant time' means a time falling:

- on or after 2 May in the year following the end of the relevant tax year, and
- before the end of the six-year period beginning with the end of the relevant tax year.

Where this applies, the member must instead give their election for mandatory scheme pays before:

- the end of the three-month period beginning with the day on which the administering authority gave the pension savings statement, or if earlier
- the end of the six-year period beginning with the end of the relevant tax year.

Though the 31 July deadline is extended in these cases, members remain unable to give a mandatory scheme pays election once they are entitled to payment of all their benefits under the scheme or, if earlier, once they have reached age 75.

The mandatory scheme pays deadline is not extended for members who previously qualified to elect for mandatory scheme pays in respect of the relevant tax year but chose not to. If the member did elect for mandatory scheme pays, the member will need to amend their initial election based on the recalculated amounts.

The new regulations have also changed the time limit for amending mandatory scheme pays elections. The time limit is set out in Regulation 4 of the Registered Pension Schemes (Notice of Joint Liability for the Annual Allowance Charge) Regulations 2011. Before, members had until the 31 July following the end of the four-year period beginning with the last day of the relevant tax year to amend an election. With effect from 6 April 2022, this has been extended by two years. So, if a member exceeded the annual allowance in tax year 2019/20, the new deadline for giving the amended notice is 31 July 2026. The deadline was previously 31 July 2024.

Administering authorities must report and pay annual allowance charges to HMRC using Accounting for Tax (AFT) returns. Authorities must use the return for October to December in the year following that in which the tax year ends. Though, it can choose to use a return for an earlier period.

However, where the member makes a mandatory scheme pays election by the extended deadline, the deadline will likely have expired.

For these cases, section 9 of the Finance Act 2022 extends the deadline. Where members elect for mandatory scheme pays after 30 September in the year following that in which the relevant tax year ends, the administering authority must report and pay the tax using the AFT return for the three-month period following the three-month period in which it receives the mandatory scheme pays election. Though it can choose to use the return for the period in which it received the election

- **Pensions Dashboards**

richard James recently published a blog 'Twelve months at the Pensions Dashboards Programme' (PDP).https://www.pensionsdashboardsprogramme.org.uk/2022/04/04/twelve-months-at-pensions-dashboards-programme/ Richard looks back over his first 12 months in the role as Programme Director and looks ahead to the next 12 months.

On 27 April 2022, the Pensions Dashboards Programme (PDP) published the April 2022 progress update report.https://www.pensionsdashboardsprogramme.org.uk/2022/04/27/april-2022-progress-update-report/ . The report outlines the programme's activity over the last six months. It also outlines the plans for the next six months.

On 29 April 2022 Chris Curry, PDP Principal, published a blog covering that report and hosted a webinar expanding on its content. https://www.pensionsdashboardsprogramme.org.uk/2022/04/29/pensions-dashboards-progress-insights-april-2022/ The blog covers:

- the need for pension schemes to act now to prepare for dashboards
- timelines and what to expect from DWP and the PDP
- ISP market development
- data matching and the need for improved data quality
- the process for partial matches.
- Blog on consumer protection

David Reid, PDP Head of Policy, published a blog covering the consumer protection landscape for pensions dashboards. https://www.pensionsdashboardsprogramme.org.uk/2022/05/11/consumer-protection-for-pensions-dashboards/

- **PASA good practice guidance on defined benefit (DB) transfers**

The Pensions Administration Standards Association (PASA) published Good Practice Guidance on DB transfers. PASA President, Margaret Snowdon OBE said of the guidance:

“The guidance is designed to support transfer processes which contribute to a better end-to-end member experience, ensure members and adviser communications are timely and helpful and to protect members from pension scams. We ask for the industry to work together to make defined benefit transfers faster, safer and better in order to improve member outcomes.”

https://www.pasa-uk.com/press-release-pasa-releases-good-practice-guidance-on-db-transfers/

- **PASA releases cybercrime protection checklist**

The PASA Cybercrime and Fraud Working Group has published a Cybercrime protection checklist for pension administrators. The checklist builds on cybercrime guidance published by the group in November 2020. It provides examples of steps administrators can take to assess their defences against cybercrime.

https://www.pasa-uk.com/press-release-pasa-releases-cybercrime-protection-checklist/