Cronfa Bensiynau Clwyd Clwyd Pension Fund



# FLINTSHIRE COUNTY COUNCIL

# Administering Authority for Clwyd Pension Fund

# **ADMINISTRATION STRATEGY**

[Month] 2019

[Key to draft: Proposed new text, Existing text to be removed]

# ADMINISTRATION STRATEGY

# **Introduction and Background**

This is the Statement outlining our Pension Administration Strategy for the Clwyd Pension Fund ("the Fund") and has been developed following consultation with employers in the Fund, Pension Board members and other interested stakeholders.

The aim of the administration strategy is to ensure both the Administering Authority ("AA") and the employers are fully aware of their responsibilities under the Scheme, and to outline the performance standards they are expected to meet to ensure the delivery of a high-quality, timely and professional administration service. These performance standards are explained further in the employer service level agreement.

Flintshire County Council (the "administering authority") is responsible for the local administration of the Fund, which is part of the Local Government Pension Scheme ("the LGPS"). The Fund comprises around 43 employers with active members, and approximately 47,000 scheme members (including active members, deferred and pensioner members).

Delivery of a high standard of administration service is not the responsibility of one person or organisation, but rather of a number of different parties, who between them are responsible for delivering the pensions administration service to meet the diverse needs of the membership.

This Strategy applies to all employers in the Fund. The Statement sets out the expected levels of administration performance of both the administering authority and the employers within the Fund, as well as details on how performance levels will be monitored and the action that might be taken where persistent failure occurs.

#### **Implementation**

This Strategy was first agreed in April 2016, and it outlines the level of service the administering authority would like to provide to scheme members and employers, as well as the role employers will need to play in providing that quality of service. It is recognised that the aims and objectives in this Strategy are ambitious in some cases and meeting these is dependent on the streamlining of processes and implementation of some quite radical changes to the existing ways of working .not least introducing some major new on-line functionality This Strategy is being implemented during a time which continues to present a number of challenges, not least:

- ongoing work to clear administrative backlogs accumulated during recent years
- recent high court judgements resulting in legislative retrospective changes to member benefits
- the need to complete a major scheme reconciliation exercise as a result of the introduction of the new State Pension
- continuing pressure on resources and budgets for employers and the administering authority
- the implementation of other expected national changes.

As part of the 201<mark>8/19</mark> business plan, progress has already been made in implementing improvements in the Clwyd Pension Fund Administration Section including:

- the continued implementation and roll out of i-Connect with one major employer (i-Connect is new software that will allow employer data to be loaded directly, and therefore more efficiently, into the pension administration software)
- reviewing the pension administration system work flow functionality
- developing more advanced work flow and management reporting functionality within the administration system
- the launch of the Fund's new website incorporating Member Self Service ("MSS") to scheme members
- initial work on a major review of the Fund's website

The 201<mark>9/20</mark> business plan includes further improvements to help deliver this Strategy including:

- implementing i-Connect with all other major employers
- implementing self-service web functionality to scheme members
- finalising the review of the Fund's website
- a thorough workforce review in relation to the Fund's Administration Team
- completing and monitoring a Data Improvement Plan in line with The Pension Regulator's ("TPR") requirements
- additional KPI monitoring and reporting.

This updated Strategy will be effective from 1 [month] 2019 and the performance indicators mentioned herein will demonstrate ongoing progress towards the Strategy's aims and objectives.

## **Regulatory Basis**

The LGPS is a statutory scheme, established by an Act of Parliament. The Local Government Pension Scheme Regulations 2013 provide the conditions and regulatory guidance surrounding the production and implementation of Administration Strategies.

In carrying out their roles and responsibilities in relation to the administration of the Local Government Pension Scheme the administering authority and employers will, as a minimum, comply with overriding legislation, including:

- Local Government Pension Scheme Regulations
- Pensions Acts 2004 and 2011 and associated disclosure legislation
- Public Service Pensions Act 2013 and associated record keeping legislation
- Freedom of Information Act 2000
- Equality Act 2010
- Data Protection Act 2003

- Finance Act 2013
- Relevant Health and Safety legislation and
- General Data Protection Regulations 2018 ("GDPR").

As a result of the Public Service Pensions Act 2013, the Pensions Regulator has responsibility for oversight of a number of elements of the governance and administration of Public Sector pension schemes including the LGPS. The Regulator has the power to issue sanctions and fines in respect of failings caused by the administering authority and also where employers in the Fund fail to provide correct or timely information to the administering authority. Should this happen, the administering authority would recharge any costs back to employers as set out later in this strategy.

More information relating to requirements of the Local Government Pension Scheme Regulations is included in Appendix A. This statement has been developed to include the information required by those provisions and to describe our approach in relation to meeting these requirements in the delivery of administration.

## **Our Aims and Objectives**

#### Mission Statement

The Clwyd Pension Fund Mission Statement is:

- to be known as forward thinking, responsive, proactive and professional, providing excellent customer focused, reputable and credible service to all customers
- to have instilled a corporate culture of risk awareness, financial governance, and to provide the highest quality, distinctive services within the resource budget
- to work effectively with partners, being solution focused with a 'can do' approach

In addition, we have specific aims and objectives in relation to our administration responsibilities as set out below.

#### Administration Aims and Objectives

The purpose of this strategy statement is to set out the quality and performance standards expected of Flintshire County Council in its role of administering authority and employer, as well as all other employers within the Fund.

The Administration Strategy has a number of specific objectives, as follows;

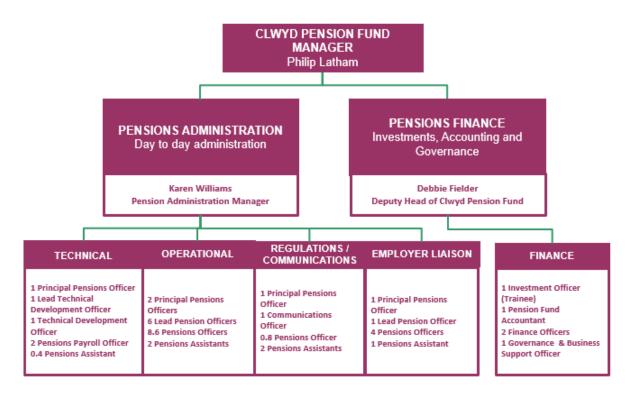
- Provide a high quality, professional, proactive, timely and customer focussed administration service to the Fund's stakeholders
- Administer the Fund in a cost effective and efficient manner utilising technology appropriately to obtain value for money
- Ensure the Fund's employers are aware of and understand their roles and responsibilities under the LGPS regulations and in the delivery of the administration functions of the Fund

- Ensure the correct benefits are paid to, and the correct income collected from, the correct people at the correct time
- Maintain accurate records and ensure data is protected and has authorised use only.

## **Delivery of Administration**

Flintshire County Council has delegated responsibility for the management of the Pension Fund to the Clwyd Pension Fund Committee, taking into consideration advice from the Pensions Advisory Panel and the Pensions Board. The Committee will monitor the implementation of this Strategy on a regular basis as outlined later in this statement.

Operationally, the administration of the Fund is undertaken 'in-house' within the Fund. The operational structure of the Pension Fund is illustrated in the schematic diagram below:



Most LGPS administering authorities provide the administration service from internal teams, although some have outsourced (or partially outsourced) their administration, and some utilise shared service administration arrangements across more than one Fund. Others outsource specific projects. The Administering Authority may, in exceptional circumstances, consider outsourcing some of its administration services.

In addition, the Administration Section will look for opportunities to work collaboratively with other administering authorities so as to reduce development costs and enhance the quality of information. This might include:

- working with other administering authorities through the Pensions Officer Group networks or the All Wales network to produce communications, which can then be customised further where necessary to the needs of the Fund
- participating in joint training sessions with other administering authorities.

## **Performance Standards – Quality**

#### Local Standards

The legislative and regulatory requirements are set out previously and in Appendix A. On top of these, the Fund and employers ensure that all administration functions and tasks are carried out to agreed local quality standards. In this respect the standards to be met are:

- compliance with all requirements set out in the employer service level agreement and this Administration Strategy Statement
- information to be provided in the required format and/or on the appropriate forms contained within the employer service level agreement
- information to be legible and accurate
- communications to be in a plain language style
- information provided or actions carried out to be checked for accuracy\* by an appropriately trained member of staff
- information provided or actions carried out to be authorised by an agreed signatory, and
- actions carried out, or information provided, within the timescales set out in this strategy statement

#### Secure Data Transfer

The Fund and its employers follow Flintshire County Council's data security guidelines when sending any personal data. Flintshire County Council uses Egress Switch to securely send data when required, which offers a combination of policy based gateway and desktop email encryption software to secure and control information sent to third parties. Egress Switch also uses;

- an authentication process
- password protection, and
- confirmation of receipt

to prevent any sensitive information from being accidentally sent to unauthorised recipients.

A key method of data transfer relating to the Fund's administration, is the receipt of information from employers in relation to scheme members. In order to meet the requirements set out in this document in a secure and efficient way (for both employers and the administering authority), Clwyd Pension Fund uses a secure data system

<sup>\*</sup> accuracy is defined as when we have received information, for example, from an employer, with **all** required areas completed **and** with no contradictory information which needs to be queried.

known as i-Connect for its larger employers (and acknowledges that it would not be cost effective to require smaller employers to use this). Any larger employers not submitting data using this data system, once it is made available to them, may risk compromising data security and quality. Consequently use of this system is compulsory to all employers in the Fund.

# Oversight of Compliance and Quality

Ensuring compliance is the responsibility of the administering authority and the employers in the Fund. The administering authority has a range of internal controls in place to assist with ensuring compliance and which are articulated in the Fund's risk register. However there are ways in which they are subject to elements of scrutiny or oversight:

#### Audit

The Fund is subject to a regular annual audit of its processes and internal controls. The administering authority, the Fund and the employers are expected to fully comply with any reasonable requests for information from both internal and approved external auditors. Any subsequent recommendations made will be considered by the Pension Fund Committee, and where appropriate duly implemented (following discussions with employers where necessary).

# <u>Local Pension Board (LPB), the national Scheme Advisory Board (SAB) or the Pensions Regulator</u>

The Public Service Pensions Act 2013 introduced greater oversight through these entities. As a result the LPB of the Clwyd Pension Fund was established from 1 April 2015. In addition, the Pensions Regulator's remit was extended to include the public sector, and a national Scheme Advisory Board was created. The administering authority and the employers are expected to fully comply with any guidance produced by the SAB and the Pensions Regulator. Any recommendations made from these entities will be considered by Flintshire County Council, in its role as administering authority, and where appropriate, duly implemented following discussions with employers where necessary.

## **Performance Standards – Timeliness and Accuracy**

Overriding legislation, including The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 (as amended), dictates minimum standards that pension schemes should meet in providing certain pieces of information to the various parties associated with the scheme. Further, the LGPS itself sets out a number of requirements for the administering authority or employers to provide information to each other, to scheme members and to prospective scheme members, dependants, other pension arrangements or other regulatory bodies. In addition to these legal requirements, local performance standards have been agreed which cover all aspects of the administration of the Clwyd Pension Fund. In many cases these go beyond the overriding legislative requirements.

The locally agreed performance standards for the Fund are set out in Appendix B. These standards are not an exhaustive list of the administering authority's and employers' responsibilities. Employers' responsibilities are provided in more detail in

the employers' service level agreement.

The locally agreed performance standards will be monitored on an ongoing basis by the administrating authority, the key standards which will be publicly reported on are extracted and shown in the table below.

These elements are measured against:

- 1. any legal timescale that should be met ("Legal requirement")
- 2. the overall locally agreed target time ("Overall case target")
- 3. the locally agreed target time for the administering authority to complete that task ("CPF Administration element target")

Generally the CPF Administration element target will be a shorter procedure within the overall case which is being measured by the Legal requirement and Overall case targets. This is because the Legal requirements and Overall case targets will generally include periods of time when the Fund is waiting for information to be provided by an employer or scheme member. The CPF Administration element target then measures the period of time it takes the Fund to carry out their element of work once the accurate\* information has been received.

<sup>\*</sup> accurate is defined as when we have received information, for example, from an employer, with **all** required areas completed **and** with no contradictory information which needs to be queried.

# Key Performance Indicators (KPIs)

Process	Legal requirement	Overall case target	CPF Administration element target
To send a Notification of Joining the LGPS to a scheme member	2 months from date of joining (assuming notification received from the employer), or within 1 month of receiving jobholder information where the individual is being automatically enrolled / re-enrolled <sup>1</sup>	46 working days from date of joining (i.e. 2 months)	3045 working days from receipt of all information
To inform members who leave the scheme before retirement age of their rights and options	As soon as practicable and no more than 2 months from date of initial notification (from employer or from scheme member) <sup>2</sup>	46 working days from date of leaving	15 working days from receipt of all information
Obtain transfer details for transfer in, and calculate and provide quotation to member	2 months from the date of request <sup>1</sup>	46 working days from date of request	20 working days from receipt of all information
Provide details of transfer value for transfer out, on request	3 months from date of request (CETV estimate) 3 or within a reasonable period (cash transfer sum) 4	46 working days from date of request	20 working days from receipt of all information
Notification of amount of retirement benefits	1 month from date of retirement if on or after Normal Pension Age <sup>1</sup> 2 months from date of retirement if before Normal Pension Age <sup>1</sup>	23 working days from date of retirement	10 working days from receipt of all information
Providing quotations on request for retirements	As soon as is practicable, but no more than 2 months from date of request unless there has already been a request in the last 12 months <sup>1</sup>	46 working days from date of request	15 working days from receipt of all information
Calculate and notify dependant(s) of amount of death benefits	As soon as possible but in any event no more than 2 months to beneficiary from date of becoming aware of death, or from a date of request by a third party (e.g. personal representative) <sup>1</sup>	25 working days from date of death	10 working days from receipt of all information

<sup>1 -</sup> The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013, as amended
2 - The Occupational Pension Schemes (Preservation of Benefit) Regulations 1991
3 - Occupational Pension Schemes (Transfer Value) Regulations 1996
4 - Pension Schemes Act 1993

#### Improving Employer Performance (where necessary)

This Strategy is focussed on good partnership working between the administering authority and the Fund's employers. However, it is recognised there may be circumstances where employers are unable to meet the required standards. The Principal Pensions Officer (either in the Technical or the Operations Team as appropriate) will seek, at the earliest opportunity, to work closely with employers in identifying any areas of poor performance or misunderstanding, provide opportunities for necessary training and development and put in place appropriate processes to improve the level of service delivery in the future.

It is expected that it will be extremely rare for there to be ongoing problems but, where persistent and ongoing failure occurs and no improvement is demonstrated by an employer, and/or unwillingness is shown by the employer to resolve the identified issue, we set out below the steps we will take in dealing with the situation in the first instance:

- The designated Principal Pensions Officer will issue a formal written notice to the person nominated by the employer as their key point of contact, setting out the area(s) of poor performance.
- The Principal Pensions Officer will meet with the employer to discuss the area(s)
  of poor performance, how they can be addressed, the timescales in which they
  will be addressed and how this improvement plan will be monitored.
- The designated Principal Pensions Officer will issue a formal written notice to the person nominated by the employer, setting out what was agreed at that meeting in relation to how the area(s) of poor performance will be addressed the timescales in which they will be addressed.
- A copy of this communication will be sent to:
  - The Pension Administration Manager
  - o The Director of Finance or other senior officer at that employer.
- The Principal Pensions Officer will monitor whether the improvement plan is being adhered to and provide written updates at agreed periods to the person nominated by the employer, with copies being provided to the Pension Administration Manager and the Director of Finance (or alternative senior officer) at that employer.

- Where the improvement plan is not being delivered to the standards and/or timescales agreed, the Principal Pensions Officer will escalate the matter to the Pension Administration Manager who will determine the next steps that should be taken. This may include (but is not limited to):
  - Meetings with more senior officers at the employer
  - Escalating to the Clwyd Pension Fund Advisory Board, Pension Fund Committee and/or Pension Board, including as part of the Fund's Procedure for Recording and Reporting Breaches of the Law
  - Reporting to The Pensions Regulator or Scheme Advisory Board, as part of the Fund's Procedure for Recording and Reporting Breaches of the Law.

# Circumstances where the Administering Authority may levy costs associated with the Employers poor performance

The Fund will work closely with all employers to assist them in understanding all statutory requirements, whether they are specifically referenced in the LGPS Regulations, in overriding legislation, or in this Administration Strategy Statement. The Fund will work with each employer to ensure that overall quality and timeliness is continually improved.

The 2013 LGPS Regulations provide that an administering authority may recover from an employer, any additional costs associated with the administration of the scheme, incurred as a result of the unsatisfactory level of performance of that employer.

Where an administering authority wishes to recover any such additional costs they must give written notice stating:

- The reasons in their opinion that the employer's level of performance contributed to the additional cost.
- The amount the administering authority has determined the employer should pay.
- The basis on which this amount was calculated.
- The provisions of the Administration Strategy Statement relevant to the decision to give notice.

The administering authority will generally not recharge to an employer any additional costs incurred by the Fund in the administration of the LGPS as a direct result of such unsatisfactory performance. However, in instances where the performance of the employer results in:

• fines being levied against the administering authority by the Pensions Regulator, Pensions Ombudsman or other regulatory body, an amount no greater that the amount of that fine will be recharged to that employer.

• the improvement plan as outlined in the last section of this statement is not being adhered to, the Pension Fund Committee may determine that any other additional costs will be recharged. In these circumstances, the Pension Fund Committee will determine the amount to be recharged and how this is to be calculated. The employer in question will be provided with a copy of that report and will be entitled to attend the Pension Fund Committee when this matter is being considered.

Whether or not interest will be charged on late contributions will be stated within the administering authority's separate policy on discretionary provisions.

# **Employer Liaison Team**

Understanding the continuing pressure on resources and budgets for employers and the administering authority, Flintshire County Council has established an Employer Liaison team which can provide assistance to employers by carrying out a number of the employer responsibilities on the employers' behalf. The Employer Liaison Agreement has a number of specific objectives which are aligned with this Clwyd Pension Fund Administration Strategy and which are as follows;

- Provide a high quality, professional, proactive, timely and customer focused service to the Employer
- Provide the agreed service in a cost effective and efficient manner utilising technology appropriately to obtain value for money
- Ensure the Employer is aware of and understands their role and responsibilities under the LGPS regulations and the Fund's Administration Strategy
- Ensure that accurate member information is provided to the Fund, in the correct format, within the agreed timescales
- Ensure data is protected and has authorised use only.

Subject to having access to the necessary systems and information, the Employer Liaison Team can carry out a number of responsibilities on behalf of an employer including:

- notification of new starters, changes in circumstances and leavers
- carrying out estimates of benefits (for example, for redundancy exercises)
- responding on behalf of the employer to queries from the Clwyd Pension Fund Operations and Technical teams, for example relating to year end submissions.

Any employer wishing to make use of this service will be expected to enter into a signed agreement which will include information relating to how the service is paid for by the employer. There may be opportunities to spread these costs, recognising the budgetary pressures that employers are currently subject to.

# **Measuring the Fund against the Administration Objectives**

The Administrating Authority will monitor the performance of the Fund in carrying out its responsibilities in relation to the scheme, and will regularly monitor performance by benchmarking against other Funds, using benchmarking clubs and other comparators available. How well the Fund performs will be reported in the Fund's Annual Report based on the statistics available at that time.

In addition, the Fund will monitor success against the administration objectives in the following ways:

Objectives	Measurement
Provide a high quality, professional,	Key Performance Indicators achieved in 90%
proactive, timely and customer	of cases* (100% for legal requirements).
focussed administration service to	
the Fund's stakeholders.	Annual satisfaction surveys with employers
	and scheme members achieving 90% of
Administra the Freed in a cost	scores in positive responses in these areas.
Administer the Fund in a cost effective and efficient manner	Cost per member is not in upper or lower
effective and efficient manner utilising technology appropriately to	quartiles when benchmarked against all LGPS Funds using national data (either SF3 or SAB)
obtain value for money.	Turius using national data (either 51 5 of 5Ab)
Ensure the Fund's employers are	Annual data checks (including ongoing
aware of and understand their roles	reconciliations) resulting in few issues that are
and responsibilities under the LGPS	resolved within 2 months.
regulations and in the delivery of the	
administration functions of the Fund.	Key Performance Indicators achieved in 90%
	of cases* (100% for legal requirements).
	Issues included in formal improvement notices
	issued to employers resolved in accordance
	with plan.
	Appual satisfaction surveys with employers
	Annual satisfaction surveys with employers achieving 90% of scores in positive responses
	in these areas.
	in those areas.
	All employers have signed up to their Service
	Level Agreements

Objectives	Measurement
Ensure benefits are paid to, and income collected from, the right people at the right time in the right	Positive results in audit and other means of oversight/scrutiny.
amount.	Key Performance Indicators achieved in 90% of cases* (100% for legal requirements).
	Minimal issues against the Fund identified by Internal Dispute Resolution Procedures and complaints.
	No breaches relating to incorrect benefit calculations as a result of errors that occurred purely within the Fund's Administration Team (e.g. not as a result of incorrect information from an employer).
Maintain accurate records and ensure data is protected and has authorised use only.	Annual data checks (including ongoing reconciliations) resulting in few issues that are all resolved within 2 months.
	Data improvement plan in place with ongoing evidence of delivered agreed improvements.
	No breaches of data security protocols.
	Positive results in audit and other means of oversight/scrutiny.

An overview of the Fund's performance against these objectives, in particular, the target standards for turnaround times, will be reported within the Fund's annual report and accounts. It will be reported, on an ongoing basis, to the Pension Fund Committee and Pension Board. In addition, these will be reported to The Pensions Regulator (if deemed appropriate) under the Procedure for Recording and Reporting Breaches of the Law (Breaches Procedure Policy).

If performance is substantially below standard (whether by a large margin for a short period of time or a small margin for a longer period of time) the administering authority will formulate an improvement plan. This will be reported to the Pension Fund Committee and Pension Board together with an ongoing update on achievement against the improvement plan.

#### **Key Risks**

The key risks to the delivery of this Strategy are outlined below. The Pensions Administration Manager and other officers will work with the Pensions Advisory Panel, Pension Fund Committee and Pension Board in monitoring these and other key risks and consider how to respond to them.

 Lack or reduction of skilled resources due to difficulty retaining and recruiting staff members and also staff absence due to sickness

- Significant increase in the number of employing bodies causes strain on day to day delivery
- Significant external factors, such as national change, impacting on workload
- Incorrect calculation of members' benefits, resulting in inaccurate costs
- Employer's failure to provide accurate and timely information resulting in incomplete and inaccurate records. This leads to incorrect valuation results and incorrect benefit payments.
- Failure to administer the scheme in line with regulations as listed under 'Regulatory Basis' in this Statement. This may relate to delays in enhancement to software or regulation guidance.
- Failure to maintain records adequately resulting in inaccurate data.
- Use of external printers/distributors resulting in possible data mismatch errors
- Unable to deliver an efficient service to pension members due to system unavailability or failure
- Failure to maintain employer contact database leading to information being sent to incorrect person

#### Approval, Review and Consultation

This Strategy Statement was originally approved in March 2016 and updated in March 2017 by the Clwyd Pension Fund Committee. It has subsequently been reviewed in June 2019 and this version is effective from 1 [Month] 2019.

It will be formally reviewed and updated at least every three years or sooner if the administration management arrangements or other matters included within it merit reconsideration, including if there are any changes to the LGPS or other relevant Regulations or Guidance which need to be taken into account.

In preparing the original Strategy, and updating it in June 2019, we consulted with the relevant employers, the scheme member and employer representatives on the Clwyd Pension Board and other persons considered appropriate. No formal consultation was carried out in March 2017 due to the nature of the changes. However scheme member and employer representatives were able to comment when it was approved at the Pension Fund Committee meeting in March 2017.

This Strategy Statement will be included within the Fund's Annual Report and Accounts and available on our website at: <a href="https://www.mss.clwydpensionfund.org.uk">www.mss.clwydpensionfund.org.uk</a>.

#### Costs

All additional costs relating to this Strategy Statement are met directly by the Fund unless mentioned otherwise.

#### **Further Information**

Any enquiries in relation to the day to day administration of the Fund or the principles or content of this Strategy should be sent to:

Karen Williams, Pensions Administration Manager

Flintshire County Council

County Hall

Mold

Flintshire

CH7 6NA

E-mail - karen.williams@flintshire.gov.uk

Telephone - 01352 702963

Any enquiries in relation to the services provided by the Employer Liaison Team should be sent to:

Kerry Robinson, Principal Pensions Officer - Employer Liaison Team

Flintshire County Council

County Hall

Mold

Flintshire

CH7 6NA

E-mail – <u>kerry.robinson@flintshire.gov.uk</u>

Telephone - 01352 702814

# Administration Legal Requirements within the LGPS

Regulations 72, 74 and 80 of Local Government Pension Scheme Regulations 2013 require the following:

#### Employer Responsibilities:

- To decide any rights or liabilities of any person under the LGPS (for example, what rate of contributions a person pays and whether or not a person is entitled to any benefit under the scheme) as soon as is reasonably practicable\*
- To formally notify that person of the decision in relation to their rights or liabilities in writing as soon as is reasonably practicable (including a decision where a person is not entitled to a benefit and why not), including information about their internal dispute resolution procedure
- To inform the administering authority of all such decisions made
- To provide the administering authority with such information it requires so it can carry out its functions including, within three months of the end of each Scheme year\*\*, the following information in relation to any person who has been an active member of the scheme in the previous year:
  - o name and gender
  - o date of birth and national insurance number
  - a unique reference number relating to each employment in which the employee has been an active member
  - o in respect of each individual employment during that year:
    - the dates during which they were a member of the scheme
    - the normal pensionable pay received and employee contributions paid
    - the pensionable pay received and employee contributions paid whilst there was any temporary reduction in contributions
    - the normal employer contributions paid
    - any additional employee or employer contributions paid
    - any Additional Voluntary Contributions paid by the employee or employer
- To appoint a person to consider complaints under stage 1 of the internal dispute resolution procedure relating to employer decisions (or a lack of a decision)\*\*\*

<sup>\*</sup>And at the latest within 1 month of the need for a decision

<sup>\*\*</sup>Note that, in practice, the Administering Authority will require this information by a specific date as outlined in the Service Level Agreement in order to meet statutory deadlines on benefit statements

<sup>\*\*\*</sup>Note that, in practice, employers in the Clwyd Pension Fund may use the same person to consider stage 1 IDRP complaints as used by the Administering Authority

## Administering Authority Responsibilities:

- To decide the amount of benefits that should be paid, including whether the
  person is entitled to have any previous service counting towards this for LGPS
  purposes, as soon as is reasonably practicable
- To formally notify that person of the decision in relation to the amount of their benefits in writing as soon as is reasonably practicable, including a statement showing how they are calculated and information about their internal dispute resolution procedure
- To appoint a person to consider complaints under stage 1 of the internal dispute resolution procedure relating to administering authority decisions (or a lack of a decision)
- To appoint a person to consider complaints under stage 2 of the internal dispute resolution procedure (which covers both employer and administering authority decisions or lack of decisions)
- To provide on request any information to an employer about a complaint under the internal dispute resolution procedure that may be required by an employer

Regulation 59(1) enables an LGPS administering authority to prepare a written statement ("the pension administration strategy") to assist in delivering a high-quality administration service to its scheme members and other interested parties. It sets out local standards which often go beyond the minimum requirements in overriding legislation as outlined above, and which the administering authority and employers should comply with.

The statement may contain matters mentioned below, as considered appropriate:

- Procedures for liaison and communication with the relevant employers in their Fund.
- The establishment of levels of performance which the administering authority and the employers are expected to achieve in carrying out their functions under the LGPS by:
  - i. the setting of performance targets;
  - ii. the making of agreements about levels of performance and associated matters; or
  - iii. such other means as the administering authority consider appropriate;
- Procedures which aim to secure that the administering authority and the employers comply with statutory requirements in respect of those functions and with any agreement about levels of performance.
- Procedures for improving the communication of information, relating to those functions, between the administering authority and the employers.
- The circumstances in which the administering authority may consider giving written notice to an employer on account of poor performance in carrying out its functions under the LGPS Regulations when measured against the agreed performance levels.

- The publication of annual reports, by the administering authority, dealing with:
  - the measurement of the administering authority and the employers achievements against the agreed performance levels, and
  - ii. such other matters arising from its pension administration strategy as it considers appropriate
- Such other matters as appear to the administering authority to be suitable for inclusion in that strategy.

Regulation 59(2)e allows an administering authority to recover additional costs from an employer, where the costs are directly related to the poor performance of that employer. Where this situation arises, the administering authority is required to give written notice to the scheme employer, setting out the reasons for believing that additional costs should be recovered, the amount of the additional costs, together with the basis on which the additional amount has been calculated.

In addition, regulation 59(6) also requires that, where a pension administration strategy is produced, a copy is issued to each of their relevant employers as well as to the Secretary of State. The Administering Authority must review this statement and make such revisions as are appropriate. It is a requirement that, in preparing or revising any pension administration strategy, that the administering authority must consult its relevant employers and such other persons as it considers appropriate.

Both the administering authority and employers must have regard to the current version of the pension administration strategy when carrying out their functions under the LGPS Regulations.

# **Performance Standards**

New Appointments	
Employer's responsibility	Target Service Standard
To ensure that pensions information is	
included as part of any induction process	
To provide each new employee with basic	Within one month of joining
scheme information	

New Scheme Members	
Employer's responsibility	Target Service Standard
Provide new members with starter forms and scheme guides, where not delegated to the Administering Authority	10 working days
Decide and ensure the correct employee contribution rate is applied	Immediately on joining in line with employer's policy, and each April thereafter (as a minimum)
Provide new starter information to the administering authority for each new employee joining the LGPS	10 working days
Forward completed starter forms completed by scheme members to the administering authority	3 working days from date of first deduction of contributions
Administering Authority's Responsibility	
To accurately record and update member records on the pension administration system	5 working day from receipt of all relevant information (or within 1 week for bulk uploads)
To apply for any transfer value details from a previous fund or scheme	5 working days from receiving all information
To send a Notification of Joining the LGPS to a scheme member	3015 working days

Changes in circumstances	
Employer's responsibility	Target Service Standard
Arrange for reassessment of employee contribution rate in line with employer's policy	If applicable, as per employer's policy
Notify the administering authority of any	10 working days from date of
eligible employees who opt out of the scheme	receiving opt out
within three months of appointment.	
Send a Notification of Change (or equivalent)	15 working days from date of
if legally required to a scheme member	change
Notify the administering authority of all other	15 working days from date of
relevant changes in the circumstances of	change
employees	

Refund any employee contributions deducted in error, or where the member opts out in writing within 3 months with no previous LGPS	Month following the month of election
membership.	
Administering Authority's Responsibility	
To accurately record and update member	5 working days
records on the pension administration system	
To send a Notification of Change (or	15 working days from receiving
equivalent) if legally required	information

Retirement Estimates (including ill-health)	
Employer's responsibility	Target Service Standard
Provide pay (and other membership) details when a member requests an early retirement estimate	8 working days
Administering Authority's Responsibility	
Providing quotations on request for retirements	15 working days from receipt of all relevant information
Providing provisional statement of retirement benefits for deferred members	1 month before retirement

Actual Retirements (including ill-health)	
Employer's responsibility	Target Service Standard
Notify the Fund when members are due to	As early as possible and no later
retire and reason for retirement (and	than 15 working days before date
authorisation where appropriate)	of retirement
Notify the Fund when a member leaves	8 working days from members
employment, including an accurate	final pay date
assessment of final pay	
Send a Notification of Entitlement to Benefit if	No later than 5 working days
legally required to a scheme member	before date of retirement
(including determining tier of ill-health	
retirement if applicable)	
Administering Authority's Responsibility	
To accurately record and update member	5 working days from receipt of all
records on the pension administration system	relevant information
Notification of amount of retirement benefits	10 working days from receipt of all
and payment of tax free cash sum	relevant information
Notification of amount of recalculated	10 working days from receipt of all
retirement benefits and payment of any	relevant information
balance tax free cash sum following updated	
information	

III-Health Retirements (additional responsibilities)	
Employer's responsibility	Target Service Standard
Appoint a qualified independent medical practitioner (from the approved list provided by the Administering Authority) in order to consider all ill health retirement applications, and agree this appointment with the Fund.	Within one month of becoming an employer within the Fund
To keep a record of all Tier 3 ill-health cases and to review these cases after 18 months	
Notify the Fund of the results of any review of Tier 3 ill-health cases with appropriate information to allow the Fund to recalculate benefits if necessary	5 working days of results of review
Send a Notification of Entitlement to Benefit (or change in benefit) to a scheme member following the review of his/her Tier 3 ill-health benefits	5 working days of results of review
Administering Authority's Responsibility	
To notify employers prior to scheduled	3 months prior to scheduled
discontinuation of benefit payments, and before updating the member records to "pensioner with deferred benefits".	discontinuation date

Members leaving before retirement	
Employer's responsibility	Target Service Standard
Notify the Fund of the member's date of (and	8 working days from member's
reason for) cessation of membership, and all other relevant information.	most recent pay date
Administering Authority's Responsibility	
To accurately record and update member	5 working days from receipt of all
records on the pension administration system	relevant information
To inform members who leave the scheme of	15 working days from receipt of all
their deferred benefit entitlement	relevant information
Provide a refund of contributions where	10 working days from receipt of all
requested	relevant information
Provide a statement of current value of	15 working days
deferred benefits on request	

Death Benefits	
Employer's responsibility	Target Service Standard
Notify the Fund of the death of a member and	8 working days of being notified
provide details of next of kin where available	
Administering Authority's Responsibility	
Write to next of kin or other contact requesting	5 working days from notification
information following the death of a scheme	
member	
Calculate and notify dependant(s) of amount	10 working days from receipt of all
of death benefits	relevant information
Decide who should be recipient(s) of death	7 working days from receipt of all
grant and pay death benefits appropriately as	relevant information
directed	

Transfers	
Administering Authority's Responsibility	
Obtain transfer details for transfer in, and	20 working days from receipt of all
calculate and provide quotation to member	relevant information
Request transfer value upon acceptance of	5 working days
transfer in	
Notify scheme member of benefits purchased	15 working days
by transfer in on receipt of payment	
Provide details of transfer value for transfer	20 working days from receipt of all
out, on request	relevant information
Provide payment of transfer value to	10 working days
appropriate recipient.	

Additional Benefits (APCs and AVCs)	
Employer's responsibility	Target Service Standard
Commence, cease or amend (as appropriate)	In month following election
deduction of APCs and AVCs	_
Administering Authority's Responsibility	
To provide information on APCs / AVCs on	10 working days from request
request to members and employers.	

Various Financial Obligations	
Employer's responsibility	Target Service Standard
Pay the Fund all employee contributions	Immediately when deducted from
deducted from payroll and all employer	pay but at the latest by the 19 <sup>th</sup>
contributions.	day of the following month.
Pay all rechargeable items to the Fund,	20 working days from receiving
including additional fund payments in relation	invoice (within standard invoicing
to early payment of benefits.	terms of 28 calendar days)
Pay all additional costs to the Fund associated	20 working days from receiving
with the unsatisfactory performance of the	invoice (within standard invoicing
employer	terms of 28 calendar days)
Administering Authority's Responsibility	
To allocate the received contributions to each	Prior to closing month end
employer's cost centre	
Issue invoice in relation to additional fund	10 working days of employer costs
payments in relation to early payment of	being confirmed
benefits	
Inform the employers of any new contribution	At least 1 month prior to the new
banding	contribution bands being
	introduced
Notify calculation and new value of pension	At least 2 working days before
following annual pensions increase	payment of revised pension

Annual Return, Valuation and Annual Benefit Statements		
Employer's responsibility	Target Service Standard	
Provide the Fund with yearend information to	By 30 April annually	
31 March each year, and any other		
information that may be required for the		
production of Annual Benefit Statements.		
Complete the Employer Compliance	By 30 April annually	
<b>Declaration</b>		
Administering Authority's Responsibility		
Process employer year end contribution	Within 1 month of receipt	
returns		
Produce annual benefit statements for all	In line with LGPS regulations	
active and deferred members.	timescales	
Provide information to the Actuary (or GAD as	As agreed between the Fund and	
appropriate) for both the triennial valuation	the Actuary.	
and for accounting purposes.		
Provide an electronic copy of the valuation	10 working days from publication	
report and associated certificate to each	of report	
employer, and to answer any questions		
arising.		

General	
Employer's responsibility	Target Service Standard
Confirm a nominated representative to receive information from the Fund, and to take responsibility for disseminating it within the organisation.	By effective date of admission or within 5 working days of previous representative leaving
Formulate and publish policies regarding all discretions that the employer may exercise, and provide a copy to the Fund.	Within 2 months of joining and also provided to administering authority every 3 years or whenever amended
Respond to enquiries from the Fund.	10 working days
Notify the Fund if the employer intends to outsource services that will involve TUPE transfers of staff, and work with the Fund to ensure an admission agreement is put in place and complied with or a bulk transfer arranged.	Initial notification immediately upon becoming aware of potential outsourcing, and at least 3 months prior to the start of the contract
Distribute any information provided by the Fund to members / potential members	5 working days
Put in place a Stage 1 Internal Dispute Resolution Procedure	Within 1 month of joining and before the effective date of any change to the existing procedure (e.g. an appointed person leaving)
Administering Authority's Responsibility	
Arrange for the setting up of an admission agreement where required	Within 3 months of all information being provided
Publish and keep up to date the Short Scheme Guide and Employers' Procedural Guide.	Updates made within 10 working days of any legislation changes but preferably before effective date
Publish and keep up to date all forms that members, prospective members and employers are required to complete.  Publish the Fund's annual report and accounts	Updates made within 10 working days of any legislation changes but preferably before effective date In line with CIPFA Guidance
and any report from the auditor  Provision of other responses to general	10 working days to provide initial
enquiries from scheme members and employers	response
Put in place a Stage 1 Internal Dispute Resolution Procedure	Before the effective date of any change to the existing procedure (e.g. an appointed person leaving)
Put in place a Stage 2 Internal Dispute Resolution Procedure	Before the effective date of any change to the existing procedure

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Pension Payments	
Administering Authority's Responsibility	Target Service Standard
Issue pension payments to designated bank accounts	To arrive on due date
Issue payslips to home addresses for those pensions where net pay has changed by £5 or more	Posted so as to arrive on the due date
Investigate returned payments and action appropriately	10 working days from receipt of return
Respond to pensioner queries in writing	10 working days from receipt of query
Implement a change to pension in payment	By next payroll period where change occurs more than 5 days prior to the payment date