

Bath & North East
Somerset Council



Avon Pension Fund

Pensions Administration Strategy Statement 2019

November 2019



Administration Strategy Statement 2019

Contents

Introduction

1. Aims	p2
2. Legislative Framework	p2
3. Key Objectives for the Fund and Scheme Employers	p3
4. Achieving the Objectives	p3
(a) Communications	
(b) Training	
(c) ICT Strategy	
(d) Performance Framework	
5. Implementation and Review	p8

Annexes

Annex 1	Legislative Framework for Administration Strategy	p9
Annex 2	Communications Policy Statement	p18
Annex 3	ICT Strategy	p28
Annex 4	Employer Performance Standards	p33
Annex 5	Customer Service Charter	p36
Annex 6	Schedule of Additional Admin Charges	p40
Annex 7	Schedule of Chargeable Services	p42

Pensions Administration Strategy Statement 2019

INTRODUCTION

The Local Government Pension Scheme (LGPS) Regulations 2013 allow Pension Fund Administering Authorities to prepare a Pensions Administration Strategy (“the Strategy”) for the sole purpose of improving the administrative processes within their LGPS Fund. In discharging their roles and responsibilities under these regulations, the Fund and scheme employers (“employers” or “employer”) are also required to comply with any related overriding legislation and have regard for any regulatory guidance or Code of Practice issued by the Pensions Regulator (TPR)

Previously, the 1st April 2015 represented a key milestone in the governance arrangements of the LGPS. From this date the Pensions Regulator undertook responsibility for setting standards of administration and governance on all administrative aspects of the scheme, whilst Local Pensions Boards established under PSPA 2013 were introduced to provide an independent scrutiny role to ‘assist’ the Fund with its ‘regulatory compliance, effective and efficient administration and governance’.

This document details the revised pension administration strategy of the Avon Pension Fund (“the Fund”) in relation to the Local Government Pension Scheme. The strategy is kept under review and revised to reflect changes to LGPS regulations and Fund policies. The document sets out the framework, outlining the policies and performance standards to enable provision of an efficient, cost-effective and high quality pension administration service ensuring the Governance and administration requirements of the TPR continue to be properly addressed as they fall to the Fund and employers.

The Local Pension Board will have responsibility for monitoring the implementation of the Strategy, including performance standards and will formally report to the Pensions Committee on both.

1. AIMS

The aim of this Strategy is to continue progress towards a seamless, automated pension service, employing appropriate technology and best practice which both significantly improves the quality of information overall and the speed with which it is processed to provide better information for Employers and stakeholders and a more efficient service to members. The Strategy recognises that significant work will need to be undertaken in achieving requirements and both the Fund and its Employers will need to work in partnership to meet this challenge.

2. LEGISLATIVE FRAMEWORK

The Fund and its Employers must have regard to this Strategy when carrying out their Scheme functions. The Strategy is made in accordance with Regulation 59 of LGPS Regulations 2013 which allows administering authorities to prepare a Pension Administration Strategy following consultation with its Employers to facilitate best practices and efficient customer service in respect of the following:

- the establishment of levels of performance which the administering authority and its Employers are expected to achieve in carrying out their Scheme functions

- ensuring the Fund and its Employers comply with statutory requirements in respect of those functions
- improving the communication between the administering authority and its Employers of information relating to those functions.

The Strategy can also set out circumstances in which the Fund may consider giving written notice to any of its Employers under regulation 70 for additional costs on account of that Employer's unsatisfactory performance in carrying out its Scheme function.

Levels of performance achieved must be included within the Fund's Annual Report along with other matters arising from the Strategy that are considered appropriate.

All relevant regulations are set out fully in **Annex 1**.

3. KEY OBJECTIVES

The key objectives of this Strategy are to ensure that:

- The Fund and Employers are aware of and understand their respective roles and responsibilities under the LGPS Regulations and in the delivery of administrative functions (largely defined in the Service Level Agreement)
- The Fund operates in accordance with LGPS regulations and is aligned with The Pension Regulator in demonstrating compliance and scheme governance.
- Communication processes are in place to enable both the Fund and Employers to proactively and responsively engage with each other and other partners.
- Accurate records are maintained for the purpose of calculating pensions entitlements and Employer liabilities, ensuring all information and data is communicated accurately, timely and in a secure and compliant manner
- The Fund and scheme employers have appropriate skills and that guidance/training is in place to deliver a high quality service and effectively contribute to the changing pensions agenda
- Standards are set and monitored for the delivery of specified activities in accordance with Regulations and minimum standards as set out in the Service Level Agreement
- Administrative services are developed and delivered digitally as outlined in the ICT Strategy, in order to streamline processes and maximise efficient use of resources.

4. ACHIEVING THE OBJECTIVES

There are presently over 400 employers in the Fund differing in size, structure and capability which represents a significant logistical challenge to the management of information, processes and services within the Fund. It is clear that because of these differences a "one size fits all approach" would be unlikely to deliver workable solutions; however standard ways of operating applicable to different employer groups would bring benefits. The number of employers within the scheme continues to grow as does the demand for more accurate and timely information, needed to improve liability management at both the local and national level. Furthermore, the Pensions

Regulator is seeking higher levels of compliance and the Fund will be required to demonstrate heightened governance and administrative efficiency.

There are four key elements necessary to achieving the Fund's administrative objectives:

- A Communications Policy that:
 - (i) Ensures members have accessible and timely information on all aspects of their pensions benefits and informs and enables decisions in respect of their pensions
 - (ii) Enables Employers to make effective decisions in the management of risks and liabilities as well as facilitates engagement in the wider pensions debate
- A training plan that will offer direct engagement and support to employers and continue to enhance staff knowledge and skills to ensure efficient administration compliant with the Pensions Regulator requirements.
- An IT Strategy which will deliver high quality, efficient and integrated digital services to employers and members in an increasingly regulated and financially complex environment.
- A performance framework which will support the effective working of the Fund and enable both the Fund and Employers to deliver continuous improvement and move towards a higher standard of service.

(a) Communications

The Fund aims to provide clear, relevant, accurate, accessible and timely information to all stakeholders. To this end, the Funds' communications strategy is already well developed providing a wide range of solutions for all parties.

Continued development to the website and online services will aim to provide stakeholders with a single secure access point to relevant services and a range of tools to help streamline and improve efficiency, support good governance and be cost effective. Online services will be available through all devices and formats.

The Communication Policy Statement is attached as **Annex 2**.

The Customer Service Charter is attached as **Annex 5**

(b) Training and Engagement

The objectives of the Fund have always been to keep stakeholders informed of new developments providing training courses and workshops for Employers and the Fund's staff alike when new Regulations are implemented or are under consideration. Additionally training is offered on an ongoing basis to new scheme employers or relevant new HR/Payroll staff.

With this in mind, it is important that both Employers and the Fund ensure that their staff have the right level of skills and knowledge to support any changes, starting with a sound foundation of existing regulations and administrative processes.

Notwithstanding future changes, there is an ongoing need to continuously maintain the quality of member records and the administrative processes by improving the quality of information received from Employers.

The aims of the training strategy are therefore:-

- To maintain a high standard of customer service for members and Employers

- To ensure that relevant staff within each Employer have sufficient knowledge and skills to effectively discharge administrative processes
- To ensure that Employers are fully aware of the risks involved in poor administration and maintenance of member pension records and if they fail to discharge of their discretionary functions
- Recognising the continued growth in employer portfolio – provide ongoing training platform on relevant employer responsibility
- To support the implementation of new technology within the Fund enabling greater self service for the Employer and streamlined administration
- To continually develop the technical skills and competencies of the Fund's staff and retain knowledge in the application of historic regulations
- To identify and develop staff to become the future managers and professionals of the Fund as part of a workforce development plan
- To ensure that members of the Pensions Committee and Local Pension Board also receive adequate training to properly discharge their function.
- Develop a new chargeable resource package to offer direct engagement/support to employers to ensure compliance with regulatory and TPR requirements.

To achieve this:

- The Fund will work with Employers' Human Resources, Payroll and other key staff to identify relevant skills and knowledge gaps and present an appropriate training programme
- Organise workshops and forums for Employers to debate new issues as they emerge
- Continue to invest in specific technical training and professional development of Fund staff
- Promote an ongoing programme of Committee and LPB member training and participation in national events to support governance arrangements.

This training strategy will ensure that both the Fund and Employers have a common understanding of their obligations under their Local Government Pension Scheme and that administrative processes are designed and in place to maximise efficiency and effectively manage risk.

The Fund will provide training for Employers' relevant staff, to build up and maintain a level of professional expertise which together with the Employer's own systems and processes will enable Employers to deliver information required by the Fund to efficiently administer the Scheme.

(c) IT Strategy

The ICT vision for Pensions Administration is to be able to “deliver high quality, efficient and integrated digital services to employers and members” in an increasingly regulated and financially complex environment.

The strategy builds upon the work already undertaken to achieve a digital step change between Fund and Employers in the use of technology to promote a significant degree of self-service. Further development in design solutions are needed to achieve greater efficiency in the wake of growing demand and releasing resources to support the control framework of the digital model and support employers at the front end and with higher value service.

Full details of the ICT Strategy are contained separately in **Annex 3**

(d) Performance

The Administration Strategy has a statutory obligation to set performance standards and publish both the targets and achievement against those targets. The purpose of doing so is to secure and monitor continuous improvement of the administration function. **Annex 4** details the performance measures and proposed targets which will be monitored. The outcomes will be subject to external scrutiny by The Pensions Regulator, the Local Pensions Board and the Pensions Committee. Information is also published in the Pensions Fund' Annual Report. It should be noted that many of these targets are set to ensure compliance with *statutory* requirements that already exist.

Service Level Agreement

New Service Level Agreements ("SLAs") will be agreed with Employers to set and monitor performance at the local level and will include all the targets for both the Fund and the Employer and will include areas relating to TPR compliance and chargeable Fund resource to enable employers to meet compliance requirements.

The aggregated performance will be reported to the Pension Committee and Local Pension Board on a quarterly basis.

Reporting on Performance

The Pensions Regulator codes of practice require scheme managers to keep records of information pertaining to both common and scheme specific data across all membership categories. The Pensions Board will play an independent scrutiny role to 'assist' the Fund with its regulatory compliance and has the authority to report any serious concerns to the Pensions Regulator.

Assessment of the levels of administrative performance requires that agreed performance standards are continuously monitored and the results fed back to Employers. This will be achieved by the production of a quarterly Performance Report for each Employer to keep them fully informed of the efficiency of service delivery to the Scheme Members. The Performance Report will contain the key areas of performance and will be a working document. Reports will also take into account any TPR compliance issues and where the Fund identifies poor quality or missing data it will put a data improvement plan in place to address these issues.

The Performance Report will measure the efficiency of service processes covering early leavers, retirements, estimates and deaths in service between the Employer and the Fund to enable effective benefit processing and payment. The Report will also include, if appropriate, details of any complaints from members or employers and discretions not exercised or kept up-to-date by employers.

Review meetings to consider the findings will be held regularly with employers and will identify problem areas and devise an action plan to improve service delivery. Information from the Performance Report will be made available to the Avon Pension Fund Committee and LPB and details of performance review will be included in the Fund's Annual Report.

(i) Performance failures

As stated at the outset, the purpose of this Strategy is to secure improvement across the Administrative processes of the Fund. Both the Fund and each Employer need to play their part in ensuring this. However in areas of continuous poor performance the Fund has the ability to

apply financial penalties and will ultimately do so but this will be actioned only as a matter of “last resort”.

Where in the opinion of the Fund, it incurs additional costs because of an Employer’s poor performance in carrying out its functions, the Fund will:

- a) give written notice to the Employer that it will be invoiced for an extra monetary amount in respect of these costs (in addition to its standard pension contributions)
- b) specify the basis on which the extra amount is calculated and the provisions of the Strategy which are relevant.

If an Employer disputes the allocation of costs it would have the opportunity to raise this with the Fund in the first instance. Employers also have access to the Avon Pension Fund Committee on which Employers have representation.

- c) The Pension Regulator imposes a statutory obligation to scheme managers and to the Local Pensions Board to report failures which are likely to be of material significance.

(ii) Opportunity to improve

It is the Fund’s intention that a poorly-performing Employer will be given the opportunity to improve its performance before additional costs are imposed upon it. However, if in the opinion of the Fund, that Employer fails to improve, the Fund will, after consultation with the Employer, issue an invoice payable by the Employer. The amount of the invoice will represent the cost to the Fund of the Employer's poor performance, plus any resultant additional work undertaken by the Fund's officers.

A schedule of penalty charges is detailed in **Annex 6** and are payable within 30 days of date of issue.

(iii) Passing on “Statutory” Fines and charges

Where the Fund incurs a fine or charge for a breach of its statutory duties which is as a result of the Employer’s performance failure (such as failing to provide the Fund with a change in a member’s circumstances or supplying inaccurate or inadequate information for an employee member), the Fund reserves the right to require the Employer to reimburse it within 28 working days of the payment of the fine or charge.

Chargeable services

In certain circumstances additional services may be required by an employer. The Avon Pension Fund is able to offer chargeable services to employers in the following circumstances:

- Failure by an employer to meet the agreed data standards
- Request by the employer for additional assistance

A schedule of chargeable services is detailed in **Annex 7**

Governance - Role of the Pensions Committee and Local Pension Board

The Avon Pension Fund Committee is widely representative of all the Employers in the Fund (reflecting best practice) and as such has a duty to ensure that the Administration of the Fund is carried out efficiently and cost effectively.

The Local Pension Board comprises of an equal number of member and employer representatives and an Independent Chairperson and has a duty to assist the administering authority in securing compliance with appropriate regulations ensuring the effective and efficient governance and administration of the Scheme.

The roles and responsibilities of both the Pensions Committee and Local Pensions Board are set out in the related Terms of Reference which form part of the Fund's Governance and Compliance Statement which is available on the Fund's website.

The Committee and LPB already receive quarterly reports in respect of the Fund and Employers administrative processes and performance and this is further enhanced with information regarding matters of compliance required by the Pensions Regulator in respect of data. The summary results reported will be scrutinised by the Board and Committee who will take action where appropriate.

The Committee annually reviews all Administrative targets and the costs of service delivery and will continue to do so in order to inform future changes to the Administration Strategy.

5. IMPLEMENTATION AND REVIEW

The Strategy sets out the key objectives of all the major areas of pension administration within the Fund and takes effect from 01 October 2019 following a full consultation exercise with Scheme Employers.

The Strategy will be further reviewed in 2022.

Local Government Pension Regulations 2013

Pension Administration Strategy

59. —(1) An administering authority may prepare a written statement of the authority's policies in relation to such of the matters mentioned in paragraph (2) as it considers appropriate ("its pension administration strategy") and, where it does so, paragraphs (3) to (7) apply.

(2) The matters are—

- (a) procedures for liaison and communication with Scheme employers in relation to which it is the administering authority ("its Scheme employers");
- (b) the establishment of levels of performance which the administering authority and its Scheme employers are expected to achieve in carrying out their Scheme functions 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 considers appropriate;
- (c) procedures which aim to secure that the administering authority and its Scheme employers comply with statutory requirements in respect of those functions and with any agreement about levels of performance;
- (d) procedures for improving the communication by the administering authority and its Scheme employers to each other of information relating to those functions;
- (e) the circumstances in which the administering authority may consider giving written notice to any of its Scheme employers under regulation 70 (additional costs arising from Scheme employer's level of performance) on account of that employer's unsatisfactory performance in carrying out its Scheme functions when measured against levels of performance established under sub-paragraph (b);
- (f) the publication by the administering authority of annual reports dealing with—
 - (i) the extent to which that authority and its Scheme employers have achieved the levels of performance established under sub-paragraph (b), and
 - (ii) such other matters arising from its pension administration strategy as it considers appropriate; and
- (g) such other matters as appear to the administering authority after consulting its Scheme employers and such other persons as it considers appropriate, to be suitable for inclusion in that strategy.

(3) An administering authority must—

- (a) keep its pension administration strategy under review; and
- (b) make such revisions as are appropriate following a material change in its policies in relation to any of the matters contained in the strategy.

(4) In preparing or reviewing and making revisions to its pension administration strategy, an administering authority must consult its Scheme employers and such other persons as it considers appropriate.

(5) An administering authority must publish—

- (a) its pension administration strategy; and
- (b) where revisions are made to it, the strategy as revised.

(6) Where an administering authority publishes its pension administration strategy, or that strategy as revised, it must send a copy of it to each of its Scheme employers and to the Secretary of State as soon as is reasonably practicable.

(7) An administering authority and its Scheme employers must have regard to the pension administration strategy when carrying out their functions under these Regulations.

(8) In this regulation references to the functions of an administering authority include, where applicable, its functions as a Scheme employer.

Additional costs arising from Scheme employer's level of performance

70. —(1) This regulation applies where, in the opinion of an administering authority, it has incurred additional costs which should be recovered from a Scheme employer because of that employer's level of performance in carrying out its functions under these Regulations.

(2) The administering authority may give written notice to the Scheme employer stating—

- (a) the administering authority's reasons for forming the opinion mentioned in paragraph (1);
- (b) the amount the authority has determined the Scheme employer should pay under regulation 69(1)(d) (payments by Scheme employers to administering authorities) in respect of those costs and the basis on which the specified amount is calculated; and
- (c) where the administering authority has prepared a pension administration strategy under regulation 59, the provisions of the strategy which are relevant to the decision to give the notice and to the matters in sub-paragraphs (a) or (b).

Statements of policy about exercise of discretionary functions

60. —(1) A Scheme employer must prepare a written statement of its policy in relation to the exercise of its functions under regulations—

- (a) 16(2)(e) and 16(4)(d) (funding of additional pension);
- (b) 30(6) (flexible retirement);
- (c) 30(8) (waiving of actuarial reduction); and
- (d) 31 (award of additional pension),

and an administering authority must prepare such a statement in relation to the exercise of its functions under regulation 30(8) in cases where a former employer has ceased to be a Scheme employer.

(2) Each Scheme employer must send a copy of its statement to each relevant administering authority before 1st July 2014 and must publish its statement.

(3) A body required to prepare a statement under paragraph (1) must—

- (a) keep its statement under review; and
- (b) make such revisions as are appropriate following a change in its policy.

(4) Before the expiry of a month beginning with the date any such revisions are made, each Scheme employer must send a copy of its revised statement to each relevant administering authority, and must publish its statement as revised.

(5) In preparing, or reviewing and making revisions to its statement, a body required to prepare a statement under paragraph (1) must have regard to the extent to which the exercise of the functions mentioned in paragraph (1) in accordance with its policy could lead to a serious loss of confidence in the public service.

(6) In this regulation a relevant administering authority in relation to a Scheme employer, is any authority which is an appropriate administering authority for that employer's employees.

Statements of policy concerning communications with members and Scheme employers

61. —(1) An administering authority must prepare, maintain and publish a written statement setting out its policy concerning communications with—

- (a) members;
- (b) representatives of members;
- (c) prospective members; and
- (d) Scheme employers.

(2) In particular the statement must set out its policy on—

- (a) the provision of information and publicity about the Scheme to members, representatives of members and Scheme employers;
- (b) the format, frequency and method of distributing such information or publicity; and
- (c) the promotion of the Scheme to prospective members and their employers.

(3) The statement must be revised and published by the administering authority following a material change in their policy on any of the matters referred to in paragraph (2).

Pension fund annual report

57. —(1) An administering authority must, in relation to each year beginning on 1st April 2014 and each subsequent year, prepare a document ("the pension fund annual report") which contains—

- (a) a report about the management and financial performance during the year of each of the pension funds maintained by the authority;

- (b) a report explaining the authority's investment policy for each of those funds and reviewing the performance during the year of the investments of each fund;
- (c) a report of the arrangements made during the year for the administration of each of those funds;
- (d) for each of those funds, a statement by the actuary who carried out the most recent valuation of the assets and liabilities of the fund in accordance with regulation 62 (actuarial valuations of pension funds), of the level of funding disclosed by that valuation;
- (e) the current version of the statement under regulation 55 (governance compliance statement);
- (f) for each of the funds, the fund account and net asset statement with supporting notes and disclosures prepared in accordance with proper practices;
- (g) an annual report dealing with—
 - (i) the extent to which the authority and the Scheme employers in relation to which it is the administering authority have achieved any levels of performance set out in a pension administration strategy in accordance with regulation 59 (pension administration strategy), and
 - (ii) such other matters arising from a pension administration strategy as it considers appropriate;
- (h) the current version of the statement referred to in regulation 58 (funding strategy statement);
- (i) the current version of the investment strategy under regulation 7 (investment strategy statement) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016;
- (j) the current version of the statement under regulation 61 (statements of policy concerning communications with members and Scheme employers); and
- (k) any other material which the authority considers appropriate.

Public Service Pensions Act 2013

2013 c. 25 Administration

17 Regulatory oversight

(1) Schedule 4 contains provision relating to the regulation of schemes under section 1, new public body pension schemes and connected schemes.

(2) The Secretary of State may by order make—

(a) provision consequential on Schedule 4, and

(b) further provision for, or in connection with, the regulation of public service pension schemes within the meaning of the Pensions Act 2004 (as amended by that Schedule).

(3) The provision referred to in subsection (2) includes provision made by amending any legislation (including this Act).

(4) An order under this section may make different provision for different purposes.

(5) An order under this section is subject to—

(a) the affirmative procedure, if it amends primary legislation, and

(b) the negative procedure, in any other case.

SCHEDULE 4 Regulatory oversight [section 17]

Amends the Pensions Act 2004 to cover Public Service Pensions and the Pension Regulator involvement

Section 16

Records

- (1) The scheme manager for a scheme under section 1 and any statutory pension scheme that is connected with it must keep such records as may be specified in regulations made by the Secretary of State.

The Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014

Records

3. For the purposes of section 16 of the 2013 Act, the scheme manager for a public service pension scheme must keep the records which are specified in regulations 4 to 6.

Records of member and beneficiary information

4.—(1) In respect of member and beneficiary information, the records which are specified are—

(a) the name of each member and of each beneficiary;.

(b) the date of birth of each member and of each beneficiary;.

(c) the gender of each member and of each beneficiary;.

(d) the last known postal address of each member and of each beneficiary;.

(e) each member's identification number in respect of the scheme;.

(f) the national insurance number of each member who has been allocated such a number; and.

(g) in respect of each active member, deferred member and pensioner member—.

(i) the dates on which such member joins and leaves the scheme;.

(ii) details of such member's employment with any employer participating in the scheme including—.

(aa) the period of pensionable service in that employment; and.

(bb) the amount of pensionable earnings in each year of that employment..

(2) In respect of each member's rights and, where applicable, of each beneficiary's entitlement, to any benefits which are not money purchase benefits, injury benefits or compensation benefits under the scheme, the records which are specified are—

(a) any formula or formulas used for calculating the member's or beneficiary's pension or benefit;.

(b) the percentage to be applied in respect of revaluation for each year to the member's accrued rights to benefits under the scheme; and.

(c) any increase to be applied to the pensioner member's or beneficiary's pension or benefit in payment in each year..

(3) In respect of each member's rights to any money purchase benefits under the scheme, the records which are specified are—

(a) any investment decisions taken by, or in relation to, the member;.

(b) any investments held on behalf of the member; and.

(c) any anticipated date of retirement notified by the member..

(4) In respect of pension credits under section 29(1)(b) of the Welfare Reform and Pensions Act 1999(1) (creation of pension debits and credits) or under article 26(1)(b) of the Welfare Reform and Pensions (Northern Ireland) Order 1999(2) (creation of pension debits and credits), the records which are specified are records of any information relevant to calculating each member's rights under the scheme which are attributable (directly or indirectly) to a pension credit.

(5) In respect of pension debits under section 29(1)(a) of the Welfare Reform and Pensions Act 1999 or under article 26(1)(a) of the Welfare Reform and Pensions (Northern Ireland) Order 1999, the records which are specified are records of any information relevant to calculating any reduction in each member's rights under the scheme which are attributable to a pension debit.

Records of transactions

5. In respect of transactions, the records which are specified are—

(a) any employer contribution or member contribution paid in relation to each active member;

(b) payments of pensions and benefits including the date of the payment;

(c) except where the payment is a payment under paragraph (b) or (f), payments made by, or on behalf of, the scheme manager to any person including—

(i) the name and address of the person to whom payment was made; and

(ii) the reason for that payment;

- (d) any movement or transfer of assets from the scheme to any person including—
 - (i) the name and address of the person to whom the assets were moved or transferred; and
 - (ii) the reason for that transaction;
- (e) the receipt or payment of money or assets in respect of the transfer of members into or out of the scheme including—
 - (i) the name of that member;
 - (ii) the terms of the transfer;
 - (iii) the name of the scheme into or out of which the member has been transferred;
 - (iv) the date of the transfer; and
 - (v) the date of receipt or payment of money or assets;
- (f) payments made to any member who leaves the scheme, other than on a transfer, including—
 - (i) the name of that member;
 - (ii) the date of leaving;
 - (iii) the member's entitlement at that date;
 - (iv) the method used for calculating any entitlement under the scheme; and
 - (v) how that entitlement was discharged;
- (g) payments made to any employer participating in the scheme;
- (h) any amount due to the scheme which has been written off in the scheme's accounts; and
- (i) any other payment to the scheme including the name and address of the person from whom it is received and, where a payment is made in respect of a member, the name of the member in respect of whom it is made.

Records of pension board meetings and decisions

6.—(1) In relation to any pension board meetings, the records which are specified are records relating to any such meeting including—

- (a) the date, time and place of the meeting;
- (b) the names of all the members of the pension board invited to the meeting;
- (c) the name of any person who attended the meeting and the capacity in which each attended; and
- (d) any decisions made at the meeting.

(2) In relation to any other decision made by the members of the pension board in the exercise of their functions as members of the pension board, the records which are specified are records relating to any such decision including—

(a) the date, time and place of the decision; and

(b) the names of the members of the pension board who participated in making the decision.

(3) In relation to any decision made by a committee or sub-committee of the pension board which has not been ratified by the pension board, the records which are specified are records relating to any such decision including—

(a) the date, time and place of the decision; and

(b) the names of the members of the committee or sub-committee who participated in making the decision.

Amendment of the Occupational Pension Schemes (Scheme Administration) Regulations 1996

7. For regulation 16A of the Occupational Pension Schemes (Scheme Administration) Regulations 1996) (exemptions from the requirement to notify the Authority or the member of a late contribution payment) substitute—

“Exemptions from the requirement to notify the Authority or the member of a late contribution payment

16A.—(1) Subject to paragraph (3), where an amount corresponding to any contribution payable on behalf of an active member of an occupational pension scheme—

(a) is deducted from that member’s earnings in respect of any employment; and

(b) is not paid to the trustees or managers of the scheme within the period of 19 days beginning on the first day of the month after which the deduction is made,

the trustees or managers do not need to give notice of the failure to pay that amount within that period to the Authority or member in the circumstances specified in paragraph (2).

(2) The specified circumstances are where the trustees or managers of the scheme are exempt from the requirement—

(a) to secure the preparation, maintenance and revision of a payment schedule for the purposes of section 87(1) of the 1995 Act (schedules of payments to money purchase schemes), by virtue of regulation 17; or

(b) to prepare, review and if necessary revise a schedule of contributions under section 227 of the 2004 Act (schedule of contributions), by virtue of any of sub-paragraphs (a) to (i) and (k) to (m) of regulation 17(1) of the Occupational Pension Schemes (Scheme Funding) Regulations 2005.

(3) Paragraph (1) does not apply in circumstances where the scheme is a public service pension scheme.

(4) For the purposes of this regulation—

“the 2013 Act” means the Public Service Pensions Act 2013;

“connected”, “new public body pension scheme” and “statutory pension scheme” have the meanings given in section 37 of the 2013 Act (general interpretation);

“public service pension scheme” means—

(a) a scheme established under section 1 of the 2013 Act (schemes for persons in public service);

(b) a new public body pension scheme;

(c) any statutory pension scheme which is connected with a scheme referred to in para (a) or (b).

Explanatory note for this amendment

Under section 49 of the Pensions Act 1995 (c. 26) trustees or managers must notify the Pensions Regulator and the member where there is a late payment of a contribution where such late payment is likely to be of material significance to the Pensions Regulator’s functions. Regulation 16A of the Occupational Pensions Schemes (Scheme Administration) Regulations 1996 sets out exceptions to that duty. The amendments mean that managers of public service pension schemes under the 2013 Act cannot benefit from the exception and will now be subject to the duty to notify.

Communications Policy Statement 2019**Our communication aims:**

The Avon Pension Fund is committed to delivering a consistently high level of performance and customer service to its members, employers and stakeholders. Effective communication is at the core of this commitment.

Our communication aims are to:

- provide clear, relevant, accurate, accessible and timely information to all our audiences and stakeholders
- support members to enable them to make informed decisions about their pensions by making information available
- use plain language and avoid unnecessary jargon
- listen and respond appropriately to feedback we receive
- become an digital communication-based Fund, utilising new communication technology (web, email, social media)
- be compliant with all legislative requirements with regard to communicating with members, such as the Pensions Regulator

What the policy statement covers

The policy outlines the communications we provide to various audiences such as our stakeholders, audiences and interested parties.

The communications matrix highlights our audiences, methods of communication and their frequency.

How do we communicate?**Digital plans**

When deciding how best to communicate we take into consideration our audience's needs and requirements, regulatory and compliance factors, as well as cost implications for the Fund. We aim to use the most appropriate and effective means of communication for the audiences receiving the information.

Our aim is to conduct the majority of communication with members in electronic/digital format (via our website, online member self-service and email). We follow Disclosure Regulations, which say that we should write to members about changes to their pension and that they can request in writing for continued use of paper-based communications, even if the Fund conducts the majority of its communications digitally. The 'my pension online' facility also allows members to choose how they wish to be communicated with. Members can change their preferences at any time.

The Fund's Digital Road Map and ICT Strategy outline the actions the Fund is taking to move to more digital communications.

Access to communication

We want to ensure that all members can access our services, whatever their needs. All print and electronic communications are designed with consideration for those with additional needs. Our communications media is measured against accessibility standards and we can arrange large print, audio or Braille versions of all printed literature.

Increasingly we are using electronic forms of communication, but we will always offer members the opportunity to receive paper copies by post. Face-to-face and telephone communications will continue to be important channels for members to interact with the Fund and vice-versa.

Customer service

The Fund prides itself on delivering the highest level of customer service to our members, employers and stakeholders. Our Customer Service Charter accompanies the Communications Policy Statement. This outlines standards that customers can expect from us and methods to contact us, including how to make comments, compliments or complaints.

Commitment to staff training and development

We recognise that knowledgeable, experienced and enthusiastic staff is key to delivering good communication and customer service. We are committed to training and developing members of staff to enable delivery of an effective pensions administration service.

Freedom of Information (FOI)

We comply with FOI requests within statutory guidelines and timescales

Data Protection

The security of members' personal data is the Fund's highest priority. Under General Data Protection Regulations (GDPR) the Fund publishes a Privacy Notice, which outlines for members how their data is store, managed and shared. This notice will be reviewed on an annual basis. The Fund has processes in place to ensure that personal data is managed securely and has a reporting process in place if any data protection breaches occur. In respect of communication, the Fund does not share members' personal data with third parties for promotional purposes.

Feedback and surveys

The Fund actively encourages and responds to feedback from members and employers. The website is a key route for member feedback, with online surveys available. The Fund also gathers feedback through letters/correspondence with members. Feedback is formally reported to the Pensions Committee on a quarterly basis.

Who we regularly communicate with:

- Scheme members (active, deferred and pensioners)

- Employing authorities (referred to as “Employers”)
- Prospective scheme members
- Prospective employers
- Representatives of scheme members (trade unions)
- Avon Pension Fund Committee
- Avon Pension Fund Board
- Brunel Pension Partnership Ltd
- Other bodies / organisations – such as:
 - Media
 - Investment managers
 - Actuary
 - Other Funds
 - Department for Communities and Local Government (DCLG)
 - Local Government Association (LGA)
 - The Pensions Regulator
 - Advisers / consultant

Fund communications matrix

This outlines the current (as of July 2018) communication channels, their target audience and frequency

Communication material	Audience	Electronic	Paper based	Website	Face-to-face	Frequency	Reviewed
Avon Pension News (newsletter)	Active members	✓	✓	✓		Twice a year (one with ABS)	Ongoing
Avon Pensioner News (newsletter)	Pensioner members	✓	✓	✓		Once a year (with P60)	Ongoing
Deferred Pension News (newsletter)	Deferred members	✓	✓	✓		Once a year (with ABS)	Ongoing
Website: (www.avonpensionfund.org.uk)	Members / public	✓		✓		Ongoing	6 monthly review
Literature/publications/guides	Members	✓	✓	✓		Ongoing	Ongoing
“my pension online” (member self-	Members	✓	✓	✓		Ongoing	Ongoing

service)							
Pension clinics and seminars	Members				✓	Quarterly	Ongoing
Member Drop-In Sessions	Members				✓	Weekly	Ongoing
Annual Benefit Statements	Active & Deferred members	✓	✓	✓		Annual	Annually
Telephone and email contacts	Members/employers/public			✓			Ongoing
New starter packs	Active members	✓	✓	✓		On Request	Annually
Statutory notice / Welcome letter for new starters	Active members	✓	✓			On Joining	Ongoing
Website (www.apfemployers.gov.uk)	Employers	✓		✓		Ongoing	6 monthly review
Employer monthly data updates / iConnect	Employers	✓		✓		Ongoing	Ongoing
Annual Report and Accounts	Members/employers/public	✓		✓		Annual	Annually
Employer email updates and bulletins	Employers	✓		✓		Ongoing	Ongoing
Employer training videos	Employers	✓		✓		Ongoing	Ongoing
Employer training and workshops	Employers	✓		✓		Ongoing	Ongoing
Employers' Conference	Employers				✓	Once a year	Ongoing
Employer Forums	Employers				✓	At least twice a year	Ongoing
Investment Forum	Employers				✓	Once a year	Ongoing

Methods of communication

1. What the Fund provides for *scheme members*

It is essential that scheme members are provided with appropriate information regarding the pension scheme and their own benefits, to enable them to make informed choices and decisions.

Scheme members are:

- **Active members** (people who are currently in the employment of a participating employer)
 - **Deferred members** (people who have left the employment of a participating employer, but who have not yet retired)
 - **Pensioners** (people who are in receipt of a pension from the Fund)
-
- ***Scheme literature/publications/guides***

The Fund produces all paper-based and electronic communications, such as brochures, guides or individual letters in a corporate and branded style. A short guide to the Local Government Pension Scheme and a fuller more detailed guide are available to active members (and prospective members). These guides are available electronically on the Fund's website, and in hard copy format (also available in Braille and audio versions) on request. Forms and factsheets are also available from the website or upon request in hard copy. Often these are sent as part of correspondence with members.

- ***Internet***

The Avon Pension Fund has two websites, one of which is aimed at members.

www.avonpensionfund.org.uk is the Fund's public website for members, prospective members and the wider population. It's the Fund's main information resource for these different audience types. As well as an information resource on the LGPS the website contains downloadable forms and factsheets for members as well as being the portal for "my pension online" (see below for more details).

This website provides a customer-focussed content platform, with information relevant to the various audiences and member life stages. The site has self-service functionality such as online forms (a contact us form) and integration with "my pension online". The website and my pension online are accessible and compatible with mobile platforms, such as tablets and smart phones.

- ***"my pension online" (member self-service)***

Through the Fund's public website, scheme members can securely access their pension details held on the Fund's pension database. This facility allows members to check their personal details, update contact details, update expression of wish forms, submit queries and produce estimates of their potential LGPS benefits.

Pensioner members have the facility to view their Pensions Payment Advice slips and P60s, as well as notify the Fund of bank or building society changes.

- **Newsletters**

For active members the Fund produces its newsletter *Avon Pension News* at twice a year, with one issue being posted with the Annual Benefit Statement. For deferred members a newsletter is produced once a year and sent with the Annual Benefit Statement. The newsletter contains articles on changes to the LGPS regulations, summary of the Fund's Annual Report and Accounts and any relevant information and promotional messages for members. The newsletter is currently posted to members, but it is also available electronically on the Fund's public website and through "my pension online".

For pensioner members, *Avon Pensioner Newsletter*, is produced at once a year and is posted out to members along with their pay slip (usually in April). The newsletter includes information about pensions increase, pay day dates and reminders about changes of address or bank details. The newsletter is also available electronically online and through "my pension online".

- **Pension clinics and seminars**

We will hold pension clinics for members at least quarterly at rotating venues. Additional clinics, held at the request of employers, will be considered, however, charges may apply. A pension clinic involves pensions officers visiting a venue to discuss benefits on a 'one-to-one' basis with active members who have pre-booked appointments.

Member Drop-In Sessions

Members can attend our drop-in sessions which are held at the Keynsham One-Stop-Shop every Tuesday between 10 am – 12:30pm & 1:30pm – 4pm to discuss their benefits on a "one-to-one" basis with a pensions officer. The Member Services team are also available for queries over the telephone during the Fund's office opening hours which are Monday to Thursday 8.30am to 5pm and Friday 8.30am to 4.30pm.

- **Annual Pension Benefit Statements**

Each year all active and deferred members are sent an Annual Pension Benefit Statement. Statements are sent by post to the home address or, alternatively, can be viewed on "my pension online".

The statement summarises the basic information we hold about them such as date of birth, hours of work, pay for pension purposes and gives estimates of the current and future value of the member's benefits. It also shows an estimate of the survivors' pension benefits.

Members may also request an estimate of benefits at any time, by phone, letter or email.

- **Pay advice slips and P60**

The Fund issues payslips to scheme pensioners in April each year. The April advice shows the effect of the annual pension increase on the gross monthly pension for both April & May. We do not send pensioners a pay slip during the rest of the financial year unless their pension amount changes by £5 or more. Early in the financial year pensioners also receive a P60 advice.

- ***Telephone and email contacts***

The Fund has a dedicated telephone number (01225 395 100) and a free phone number for pensioners (0800 0644 155).

The fund has a generic email address for all member enquiries:

avonpensionfund@bathnes.gov.uk

2. What the Fund provides for NEW / PROSPECTIVE MEMBERS

- ***New starter packs***

Each member joining the scheme receives access to a new starter pack, issued by their employer along with their contract of employment. This pack contains a scheme guide that explains rights, benefits and options for the new employee, as well as information on transferring previous pension benefits. In most instances this pack is sent electronically via a web link to the Fund's website. Hard copies of the pack are available upon request from the employer.

- ***Website***

The Fund's website (under the 'Thinking of joining' section) contains information on joining the LGPS and the benefits of the scheme.

- ***Utilising employer communications***

The Fund actively works with employers to utilise their existing communication channels, such as intranets and noticeboards, to promote the pension scheme and its benefits to employees, where appropriate.

3. What the Fund provides for EMPLOYERS

To assist employers participating in the scheme, the Fund has a range of communication materials and methods to help increase their understanding of pension issues and to fulfil their responsibilities as scheme employers. By continuing to work in partnership we are all able to provide a better service to our members.

- ***Internet***

www.apfemployers.gov.uk is the website specifically dedicated to employers. The site is username and password protected and holds details specific to individual employer organisations, which only they can access (with the Fund having administrator rights). This is a popular and well-received resource as provides a wealth of information and guidance for employers. There are downloadable forms and factsheets, online bookable training system and links to the Employer Self Service facility (see below).

- ***i-Connect / Monthly data uploads***

This enables employers to transfer and update data electronically to the Fund on a monthly basis. This includes uploading new starters, pay changes and changes of member details. This process interfaces directly to the Fund's pension database system through a controlled process.

- The submission of monthly data via i-Connect will be a mandatory requirement for all scheme employers. The Pension Fund Committee has approved a target date of 31st December 2020 to complete implementation. Failure to engage with the Fund to implement the process may be subject to penalty charges as set out in Annex 6.

- ***Annual Report and Accounts***

Our annual report, which contains the Fund's statement of accounts is available on both websites and a link is emailed to the employers.

- ***Email updates and bulletins***

Regular monthly as well as ad hoc email messages and updates are sent employers with information about issues and training opportunities.

- ***Employers' Conference***

All employers are invited to this annual event which includes presentations on topical pension issues including regulation changes and any overarching legislation.

- ***Employer training and workshops – non chargeable services***

The Fund offers a programme of training to all employers on the LGPS and their role in administering the scheme. Training and workshop sessions will cover the full range of administrative and regulatory activities, as well as specific topics, for example employer discretionary policies. Training and workshops are advertised on the employers' website, through email bulletins and newsletters, and are bookable online. Sessions available include:

- Employer Responsibilities
- I-Connect Implementation
- Support through payroll/payroll provider change
- HR responsibilities training
- Data requirement sessions
- Employer annual visit

- ***Employer training videos***

The Fund has developed a suite of short training videos available to employers. These cover areas such as the Year End process.

- ***Employer Forums***

These forums keep employers up-to-date with LGPS developments and provide a forum to discuss common issues and share good practice. These are held at least twice a year.

- ***Investment Forum***

The Investments Forum focuses on the investment strategy and actuarial developments. This is held once a year.

4. What the Fund provides for PROSPECTIVE EMPLOYERS

The Fund provides information to prospective employers to ensure they understand the LGPS Regulations, their implications and the role of a scheme employer.

The Fund will provide information which facilitates a smooth transition in respect of prospective employers to which LGPS members may TUPE transfer, such as schools which become academies and contractors providing a service to a scheme employer. Information is available on the APF employers' website.

5. What the Fund provides for It's STAFF

Regular team meetings and briefings take place with staff to keep them updated with the activities of the fund. Regular email bulletins are also sent along with training events and briefings on specific topics. All newsletters and other communications to members are shared with staff to ensure they are familiar with what the Fund is saying.

6. What the Fund provides for AVON PENSION FUND COMMITTEE

The Avon Pension Fund Committee meets quarterly to monitor activities of the Fund and its administration and takes decisions as necessary. It gives the Fund its strategic direction.

The Committee exercises a wide range of powers over Fund administration under its Terms of Reference. The Investment Sub Committee meets more regularly to review investment performance and examine opportunities for improvement in investment strategy.

Reports of these bodies are made available to the public in advance on request and at meetings. The reports and minutes of these meeting are also available on the website.

7. What the Fund provides for AVON PENSION FUND LOCAL PENSION BOARD

- A dedicated page on the Avon Pension Fund website, including details of the Board and publication of its Annual Report
- Ad hoc articles in newsletters, if required

8. Liaison with other organisations

The Fund maintains regular and ad hoc communications with the following organisations, providing information and responses where necessary:

- Trade Unions
- The media
- South West Area Pensions Officers Group (SWAPOG)
- South West Investment Managers (SWIM)
- Local Government Association (LGA)
- CIPFA Pensions Panel
- Brunel Pension Partnership Ltd

ICT Strategy

The ICT vision for Pensions Administration is to be able to “deliver high quality, efficient and integrated digital services to employers and members” in an increasingly regulated and financially complex environment.

The strategy builds upon the work already undertaken to achieve a digital step change between Fund and Employers in the use of technology to promote a significant degree of self-service. Further development in design solutions are needed to achieve greater efficiency in the wake of growing demand and releasing resources to support the control framework of the digital model and support employers at the front end and with higher value service.

Drivers for change

Whilst many of the drivers for change have been known and emerging for some time, demand growth and the financial climate are now the catalysts for greater focus on IT as the Fund and Employers grapple with a number of significant pension changes.

- There has been significant growth in employers and membership bringing with it a commensurate growth in demand, fuelled by the need for information about the Care Scheme and the ongoing downsizing and reorganising of public sector service provision
- The Care scheme itself requires far more data to be maintained about employees, compounded by the necessity to regularly auto enrol opted out members and the data management requirements of the Pensions Regulator
- The membership structure is highly complex with alternative working patterns created almost daily as employers look for increasing flexibility across the workforce.
- The Government Actuaries department also demands greater granularity of data as its cost sharing mechanism is applied as part of the valuation cycle.
- In the current financial climate, there is a need to operate as efficiently as possible and reduce the strain on the public purse and the Fund must play its part.
- The needs of employers are changing with many unaware of their complex pensions' obligations and requiring the Fund to vary its service offer.
- Finally technology has taken major steps forward over the past decade in particular and the digital economy is now accessible to a wider community through mobile applications development, changing clients expectations about the way they want to engage with the Fund and want the Fund to engage with them

ICT Service Delivery Objectives

ICT is now critical to the daily operations of the Fund Administration and is a key enabler of service improvement, sustainability and good governance. Its objectives can therefore be stated as;

- A. To manage control and make available accurate and timely member data to inform decision making and inform members and stakeholders about their respective benefits and liabilities
- B. To make this information available via multimedia channels in a secure way to ensure that members and employers are able to access information and services through all available technology
- C. To enable self-service in all communications and transactions between the Fund, its members and Employers
- D. To enable a fully digitised operating environment where all casework is electronically managed and processed
- E. To enable services to be delivered at any location, at any time from any device
- F. To manage technology risk and provide business continuity
- G. To ensure that technology skills are continuously developed and refreshed
- H. To ensure that ICT support arrangements are capable of supporting a highly digitised operating environment and continuously developing efficiency and improvement opportunities
- I. To establish meaningful partnerships with software providers enabling the fund to realise its service delivery ambitions
- J. To establish effective partnerships with stakeholders, employers and other agencies and organisations delivering innovation and service excellence

ICT Improvement Strategy

Whilst the Fund has invested significantly in ICT over the years there is further work that needs to be undertaken in order to enhance service provision and strengthen governance and development of this important area. The ICT Strategy therefor has several strands;

- Maximising the use of existing technology
- Developing new facilities and services
- Building effective partnerships with key partners
- Developing Management information
- Investing in core skills
- Ensuring services are tailored to customer needs

Maximising the use of Existing Technology

Improving our existing functionality has now taken priority, in particular mobilising case management automation, integrating existing work arounds into core product, data transfer to and from employers and extending self-service facilities. The full programme proposal is contained in the attached appendix.

Developing new facilities and services

The Fund has identified a number of developments which enable improved interaction with customers and employers. These include enhancements to the web-site and its functionality; building connectivity with related service providers (eg AVC) to provide a one stop shop for pensions; provision of employers self-service discretionary policy tool; improving access channels to better reflect modern communication tools; improving mobility of staff to enable improved localised services; improved sign posting of services and a greater emphasis on self- service.

Building effective business partnerships with Suppliers

A legacy of the way the ICT market has developed in the LGPS world is that there are very few providers and one with a dominant market share. Development when not driven by legislation is by means of consensus forcing a one paced response to demands. If the Fund is to manage its demand pressures a different relationship needs to be established whereby the Fund can advance its ideas and innovations in partnership with a committed supplier. This may mean that the Fund engages in more development and testing but will be rewarded with a more bespoke product rather than one which is designed by someone else. However it may also mean that the Fund will test the market to ensure that its suppliers are delivering value for money and the innovative solutions demanded of the future

Developing management information

As the Fund continues its transformation journey the need for timely and useful management information is a necessity in ensuring effective and relevant service delivery in the digital age. Such information in respect of performance, quality and accuracy, permeates all aspects of our service whilst information on demand growth is important in shaping services going forward. Compliance plays an increasingly important part in the need to develop good quality data sets particularly as the TPR sets out its agenda and the cap and collar mechanism has a bigger influence on contribution rates and benefits. Understanding more about the membership structure and performance is key to effectively managing it

Investing in core skills

It is expected that over the next five years the focus of administration will move away from processing data to controlling information flows and customer engagement, requiring a change in some roles and an increase of ICT infrastructure support as systems grow in use and complexity. The Fund will need to continue to invest in these emerging core skills and will need to consider how it can maintain its resilience possibly through greater collaboration and partnership

Ensuring services are tailored to customer needs

Pensions are hugely complex to the extent that most people will need some financial advice at some point in order to maximise their benefits or run the risk of not doing so. Government freedoms also mean that individuals need to consider the totality of their pensions together and this may even impact on career choices, opting in or out and personal relationships. Whilst not overtly stated the direction is clear in that we need to work more closely with other agencies if we are to help individuals navigate this complex path. More importantly though our communication strategies and the tools we use will be crucial to getting that message across

Key Delivery Stages

Compared to some peers the APF is in a strong starting position from which to make further improvements but nevertheless the developments will require a programmed approach over a period of time

The proposed delivery stages will incorporate existing planned work, some of which will operate in parallel as follows;

Work Stream 1

Phase (i): Complete implementation of i-Connect

This enables the transfer of pension data between employers and the Fund to update member records on a continuous basis with minimum intervention. The implementation is ongoing across all employers and is due to be completed by the end of 2020.

Phase (ii) Harmonising monthly contribution & i-Connect submission

The next phase will aim to reconcile employee contributions paid to i-Connect submissions to enable employers to submit one payment and one return each month to meet all the Fund's requirements, utilising the existing Employer Relationship Management system (ERM)

Work Stream 2 Creating a shared development Agenda with Software Suppliers

This focuses on a number of critical areas:

- Consolidating the Employer entry portals to a single access channel which caters for all categories of employer and transaction including online leaver forms and the ability to send all types of correspondence and files via i-Connect
- Developing the self-service agenda for employers effectively automating processes and removing Fund intervention
- Continued development of the Member Self Service (MSS) facility and requirements for the planned Pensions Dashboard.

Work Stream 3 Investing in Core skills

This will primarily support work stream 1 to ensure sufficient system knowledge to support the activities of the administration. There will be ongoing user training as part of the Fund's training programme or project implementations for specific stakeholder groups. It is anticipated that embedded working can take place with our suppliers to enhance systems knowledge.

Work Stream 4 Developing services for customers

This will involve both enhancements to systems and website to provide a suite of information and functionality delivering more relevant information to users, targeted where possible, greater use of nationally available material such as video and training suites, and greater self-service functionality.

The aim will be to have more documents available to view on My Pension Online (for example retirement packs and estimates) to streamline processes, reduce postage and improve the customer experience.

Pensioner members will also benefit from the development of better online provision of their P60s and payslips, accessed through My Pension Online.

Work Stream 5 Developing management information

This work stream continues to prioritise the Pensions Regulator Improvement plan requirements and will be developed in line with further clarification of scheme specific data from the TPR in 2019.

As more employers move to i-Connect submissions adequate monitoring and control needs to be in place to ensure submissions are on time and the data is accurate as well as mitigating any risks to the integrity of the Fund's data held on Altair.

Work Stream 6 New Employer Website

A new employer website is in initial development stages and will be in place in early 2020. The new site will be a more interactive experience for employers and link directly to all aspects of the Service Level Agreement and supporting information. It will also contain more bite size training videos to assist employers understanding of responsibilities.

This outlines service standards and response times that you can expect from us. Service standards for employers are covered in Service Level Agreements.

Who	Service	Actions / triggers	Timescale
New active members	Transfers in	Acknowledge the member’s request for transfer details, calculate the estimated benefits that a transfer value will buy for the member and issue a quotation, following receipt from the member’s previous scheme and any additional essential information required from Her Majesty’s Revenue and Customs (HMRC)	Within 10 working days
		Confirm the actual benefits purchased by the transfer value to the member, following receipt of payment from the member’s previous scheme and confirmation (where necessary) of the member’s accrued guaranteed minimum pension (GMP) from HMRC	Within 10 working days
Existing active members	Benefit estimates	Issue a quotation, following request, in line with estimate policy	Within 10 working days
	Annual Pension Benefit Statement	Send member statement, provided pay details are received from employers promptly after the close of each financial year and that we hold all of the relevant information Statement sent to the member, either by post (to their last known address) or electronically through “my pension online” via the Fund’s website The statement will show: <ul style="list-style-type: none"> • the estimated current value of their accrued benefits • the value of their prospective benefits at normal pension age • the estimated current value of their death-in-service benefits 	Annually (by 31 August)
	Retirements	Send details of the benefits payable following receipt of a leaver notification from the employer Pay the member’s tax-free cash lump-sum, following receipt of the information required from the member	Within 5 working days Within 5 working days
	Deaths	Send acknowledgement of death and request for death certificate, following notification of the death	Within 5 working days

		Make payment of death benefits following receipt of all necessary information/documentation	Within 5 working days
	Early leavers	We will send details of the benefit options available, following receipt of leaver information required from the employer We will send notification of deferred benefits either following receipt of a members leaver option form or following no response from the leaver hold letter after 30 days	Within 5 working days Within 20 working days
	Refunds	Provide member with a quotation of the refund payable following no response from the leaver hold letter after 30 days Pay a refund following member's request for payment and bank details	Within 10 working days Within 10 working days
	Transfers out	Issue a quotation (guaranteed for three months) following member's request and confirmation of the member's accrued GMP/State Second Pension from HMRC Pay the transfer value, once confirmation from the member that the transfer is to be made and all of the information we require to make payment is received and necessary checks have been carried out on the receiving scheme	Within 10 working days Within 10 working days
	Newsletters	Send, either electronically or by post, a newsletter (Avon Pension News) to members	At least twice a year
Deferred members	Benefit Estimates	Issue a quotation, following request, in line with estimate policy	Within 10 working days
	Annual Pension Benefit Statement	Provide each deferred member with a benefit statement, showing the current value of their preserved benefits, provided we have a current address	Once a year
	Deferred Benefits into Payment	Provided we hold a confirmed address we will issue the deferred member with a retirement pack. If we cannot confirm the address we will make every effort to trace the deferred member	Within 1 month prior to NPA
	Newsletters	Send, either electronically or by post, a newsletter to members	At least once a year
Pensioner members	Changes in personal details	Update a pensioner's payroll record with any changes to personal details following receiving written notification (by post or email) Due to the nature of payroll administration, such changes may not take effect until a subsequent	Within five working days

		payroll has been run. Confirmation of changes to bank details will be advised on the next available pay advice	
	Newsletter	We will send, either electronically or by post, a newsletter (Avon Pensioner News) to pensioners. This will be sent out with the pension pay advice slips	At least once a year
	Deaths	Acknowledge receipt of a notification of the death of a pensioner and start action to put into payment any dependants' benefits, following notification	Within 5 working days

Customer Service Charter 2019

The Avon Pension Fund aims to give a consistent level of service to customers, in an efficient, effective and courteous way, no matter how customers contact us.

Our **Customer Standards** apply to all our services and mean that customers can get the responses they need, consistently across the entire Fund. When dealing with enquiries, we will:

- Be helpful, polite and accessible, identifying and addressing any specific needs with sensitivity, tact and diplomacy
- Aim to deal with things as quickly as possible and follow through to deliver what we promise, dealing with any problems that arise
- Ensure that the information we give is timely, accurate and comprehensive
- Ensure we treat our customers fairly
- Use appropriate technology to manage and fulfil our customer requests , recording contact details accurately and securely, and treating communications confidentially
- Where appropriate, provide enquiry references so that details can quickly be recalled, if needed
- Regularly ask for feedback about our customer service – and use this feedback to help shape the services we deliver
- Ensure our services are easy to access, no matter which way we are in contact, as detailed in the table below.

In return we need you, our customer, to:

- tell us clearly and succinctly the nature of your enquiry
- give us the correct information at the right time
- let us know if you no longer require a service, or wish to cancel an appointment we have previously made for you
- inform us of any change to circumstances such as address, status and contact details
- tell us if we exceed your expectations or don't deliver a service to your satisfaction
- treat our staff courteously and politely

When we are in contact	Our Customer Standard
<p>In Person</p> <p>Whenever we meet, whether you visit us at any of our offices and facilities or if we arrange to come to you.</p>	<p>We will:</p> <ul style="list-style-type: none"> • Offer a welcoming efficient service • Ensure our identity badges are visible at all times • Display opening times and be open when we say (our office opening hours are Monday to Thursday 8.30am to 5pm and Friday 8.30am to 4.30pm) • Provide a safe, tidy and clean environment for you to visit and use • See you as soon as possible at our drop-in clinics, which are on a first-come-first-served basis • Aim to minimise the amount of time you wait to see someone, and; • Keep you informed of current waiting times
<p>By Phone</p> <p>When we need to use the phone.</p>	<p>We will:</p> <ul style="list-style-type: none"> • Publish our contact phone numbers to allow easy access to our most frequently requested services and aim to answer 80% of calls within 45 seconds (15 rings) during service opening hours. • Route enquiries and requests to the most appropriate trained and knowledgeable person/team to deal with your enquiry • Always answer the phone giving our name and department • We will take a message and ensure the right person calls you back if we cannot respond immediately
<p>In Writing (email or letter)</p> <p>Whether you write to us by email, letter or via our online webpage forms.</p>	<p>We aim to:</p> <ul style="list-style-type: none"> • Respond to all written enquiries within 10 working days. This means either: <ul style="list-style-type: none"> ○ A full response to your enquiry, or; ○ If we need to take longer to give a fuller response, we'll tell you why and what the next steps are, or; ○ Some email or web-based requests may be automatically acknowledged immediately and provide information about next steps • Write clearly and concisely, so that information is easy to read and

	<p>understand</p> <ul style="list-style-type: none"> • Include a named contact person and phone numbers in our correspondence when appropriate • Use email wherever possible but use another method if it's your preference or a statutory requirement
<p>By web and web-self service</p> <p>We provide many self-serve online services, available to use 24/7.</p>	<p>We will:</p> <ul style="list-style-type: none"> • Make more of our services available online, to use at a time that suits you • Ensure our online services can easily be found on our website, are clear and easy to use • Operate secure online services, where your personal data is safe • Explain clearly how to contact us in other ways if you need support
<p>However you contact us</p> <p>For some specific types of customer request we work to defined business processes or statutory timescales.</p>	<p>Comments, compliments and complaints</p> <p>We welcome feedback about any aspect of the service we provide.</p> <p>You can make a comment, compliment or a complaint by contacting:</p> <p>Geoff Cleak Pensions Manager Avon Pension Fund Bath and North East Somerset Council Lewis House Manvers Street Bath BA1 1JG</p> <p>Email: avonpensionfund@bathnes.gov.uk</p> <p>What if your complaint has not been resolved or you're not satisfied with the outcome?</p> <p>If you are not satisfied with any decision affecting you, you have the right to ask for it to be looked at again under the formal complaint procedure, known as the Internal dispute Resolution Procedure (IDRP). More information can be found on our website at:</p> <p>http://www.avonpensionfund.org.uk/customerservice/complaintsprocedure.htm</p> <p>Freedom of Information (Fol) requests</p> <ul style="list-style-type: none"> • We are required to respond within 20 working days

	Data Protection
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- We are required to respond to subject access requests about personal data within one month

Schedule of additional admin charges, fines and penalties for non-compliance Annex 6

Most employers submit accurate data and pay correct pension contributions on time. However when there is **late or inaccurate submission of data or late payment** of contributions the consequent costs to the fund are met from *all* employer's contributions which is unfair.

In order to promote efficiency, reduce costs and better target the costs of non-compliance, the following **additional** charges will be made.

Item	Trigger	Additional charge
Monthly contributions LGPS50 forms	Late submission	£50 per occasion
Monthly contributions	Late payment	Interest at base rate plus 1% as per the 2013 LGPS regulations
Year End LGPS51 form and Pensionable Pay data	Late submission Queries in excess of 10% of membership at year end	£250 per occasion plus £100 per month or part <i>thereof</i>
Fine received from regulatory body eg HMRC, TPR, ICO	APF receive fine as a result of a breach by an employer	Amount of the fine will be re-charged
Disproportionate work	Any data submissions or actions that create a disproportionate amount of work eg <ul style="list-style-type: none"> - Data cleansing exercise required due to incomplete / inaccurate data returns - Incomplete / inaccurate data received as part of an outsourcing of members to a new employer - Re-calculation of member benefits due to incorrect data - Re-runs of annual benefit statements due to incorrect data 	£50 per hour of additional work

i-Connect charges

The submission of monthly data via i-Connect is mandatory for all employers from 1 January 2021. The following penalty charges may apply if:

- Any existing employer is not live by 31 December 2020
- Any new employer admitted to the scheme between 1 October 2020 and 31 December 2020 is not live by 31 March 2021
- Any new employer is not live within the first 3 months of admission to the scheme if admitted after 31 December 2020
- Once live a monthly return is late

Number of Active members	Penalty charge for failure to start monthly i-Connect returns	Per additional month late or part thereof	Once i-Connect monthly returns are live, penalty charge for one late return during the tax year (after 22 nd of month)	Once i-Connect monthly returns are live, penalty charge for second late return during the tax year (after 22 nd of month)	Once i-Connect monthly returns are live, penalty charge for third or more late return during the tax year (after 22 nd of month)
0-10	£250	£50	Warning	£250	£250 and report to TPR
11-99	£500	£100	Warning	£500	£500 and report to TPR
100 - 999	£750	£150	Warning	£750	£750 and report to TPR
1000 +	£1,000	£250	Warning	£1,000	£1,000 and report to TPR

Any remedial work required as a result of an employers' i-Connect data submission being incorrect or corrupting the data integrity of the Altair data base will be treated either in line with the disproportionate work charge of £50 per hour or if it is necessary for the software supplier (Heywood) to correct the data, their charges will be passed on.

In certain circumstances additional services may be required by an employer. The Avon Pension Fund is able to offer chargeable services to employers in the following circumstances:

- Failure by an employer to meet the agreed data standards
- Request by the employer for additional assistance

As set out below:

Service offered	Location
Additional visits to provide: <ul style="list-style-type: none"> • Data cleansing service following continued non-compliance with data requirements • If IConnect submissions are discontinued APF will assist the employer to re-start submissions 	Employer offices
For some payroll software (eg ITrent) APF is able to offer a service to assist with the development of an IConnect extract	Employer offices
Running bespoke training sessions : <ul style="list-style-type: none"> • Employer Responsibilities • Data Requirements • HR Training • Others as requested and agreed 	Employer offices
Consultancy services are available either from senior officers or external partners in the following areas: <ul style="list-style-type: none"> • Dealing with IDRPs cases • Writing discretionary policies • Annual & Lifetime Allowance • Understanding pension liabilities • Outsourcing services & TUPE Please note these services do not offer advice, but offer guidance to ensure compliance with regulations.	Employer offices
Pension Clinics for members. APF officers can:	Employer offices

<ul style="list-style-type: none"> • provide individual pension information to members • present information to a group of staff 	
<p>Local Government Pension Committee (LGPC) training events for scheme employers</p> <p>The LGPC provides training events for scheme employers including topic-specific workshops and a 3 day residential course for those involved in LGPS administration. Details at: http://www.local.gov.uk/events</p>	<p>Nationwide locations</p>

For **Non Chargeable Services** – please refer to Annex 2 for non-chargeable services provided by the Fund to scheme employers.

Chargeable services agreement

The details of the service required and being supplied will be set out in a signed agreement as follows:

<p>Chargeable services provided by APF to _____ employer</p>
<p>APF have agreed to provide the following services: <i>Insert details of service agreed</i></p>
<p>Date to be provided:</p>
<p>Cost of services:</p>
<p>Signed by employer’s Lead Officer:</p>
<p>Date:</p>
<p>Signed by APF Employer Services Manager:</p>
<p>Date:</p>

Charge rates

The charges for these services are based on an hourly rate (including all overheads) depending on the grade of the pension officer that is supporting the employer.

Grade of Pension Officer	Hourly rate
Assistant Officer	£30
Pensions Officer	£35
Senior Pensions Officer	£40
Team Leader	£50
Dept Manager	£60
External providers	On request