



Wiltshire Pension Fund Administration Strategy Appendix

Appendix 1: Service Level Agreement - employers

Important: A failure to meet the timeframes stated may result in the Fund's applying the process outlined in its Escalation Policy.

1). High level Summary of key responsibilities:

Task	Deadline
Pay contributions and send remittance	19 th of calendar month following the date of contribution deduction
Submit i-Connect return	19 th of calendar month following the date of contribution deduction
Pay any AVC/APC/ARC/Added Years contributions to AVC provider and additional contributions to the Fund.	19 th of calendar month following the date of contribution deduction
Retirement forms: Complete and send to the Fund	At least two working days before the date of retirement
Death in Service form: Complete and send to the Fund	Within 5 working days of the death
Fund individual member additional data requests: Respond to the relevant officer	5/10 working days depending on priority level of the task.
Refund contributions through payroll (less than 3 month opt outs)	Next available payroll
Advise the Fund of a change payroll provider and TUPE transfers	At least 3 months before the changes occur.
Other tasks (infrequent) – See below for detail.	Other tasks – See below for further detail.

Note: For any employer which is still in the process of transitioning to i-Connect, the Fund will outline the additional data requirements and deadlines that will apply until the employer is fully onboarded on i-connect.

2). More detailed explanation (by task)

A). Paying contributions, submitting i-Connect returns, refunds through payroll (All employers – monthly)

Description	Performance Target
<p>1a). (All employers) Paying employee and employer contributions to the Fund.</p> <p><u>Note:</u> Employee contributions: Employee contributions should be deducted based on the relevant year’s contributions bands, as advised by the Fund each year. Employer contributions: Employer contributions are outline on the Fund’s website and are set by the actuary.</p> <p>1b). Submit remittance advice, in the format determined by the Fund and revise from time to time, to accompany the payment</p>	<p>19th calendar day of the month following the month of deduction.</p>
<p>2). (All employers) Submit an i-Connect return through the i-Connect portal.</p> <p>Further information is available on our website regarding the exact data requirements. Note: This process replaces the need to provide starter, leaver and change of details notifications.</p> <p>Important: It is essential that the information provided is checked before submission to ensure the Fund is able to calculate and maintain members’ pensions correctly. Any errors or suppressions, i.e. the target update file cannot be applied because of the issue, should be resolved prior to processing.</p>	<p>19th calendar day of the month (following the month of deduction)</p>

<p>3. (If applicable) Pay any other additional payments due to the Fund</p> <p>Payment of additional fund payments (for example strain costs) in relation to early payment of benefits from flexible retirement, redundancy, business efficiency retirement and any other payment due under Wiltshire Pension Fund charging policy as stated on our website.</p>	<p>To be received within 30 calendar days of receipt of the invoice from Wiltshire Pension Fund, or within the timescales specified if different.</p>
<p>4. (If applicable) Pay across Additional Voluntary Contributions (AVC) and other Additional contributions:</p> <p>Arrange payment of contributions to the relevant AVC provider(s) and all other additional contributions (added years, APCs and ARCs should be payable to the Fund.</p>	<p>Pay over contributions to the AVC provider(s) and the Fund by the 19th calendar day of the month</p>

B). Other key employer responsibilities (currently performed outside of i-Connect)

Currently, the following regular information needs to be submitted outside of i-Connect as and when the relevant situation arises:

Task	Employer Target timeframe
<p>Retirement Form: Submit a fully completed and accurate retirement form for voluntary retirements*, redundancies age 55+, ill health retirements and members reaching age 75. Ill Health retirement forms should also be accompanied by an ill health certificate.</p> <p><i>*Officers are investigating changing the process for voluntary retirements which may alter this requirement.</i></p>	<p>At least 2 days <u>before</u> the member's retirement date</p>
<p>Death in service form: For any deaths of LGPS members whilst still employed, complete and submit a death in service form to the Fund.</p>	<p>5 working days.</p>
<p>Data requests: Provide accurate and timely pay figures and other data. Most commonly this would be CARE or Pension Remuneration figure requests but it could also relate to any other key data needed to process a case.</p>	<p>5 working days, if the data requested relates to a process which will result in a payment to the member (or a beneficiary) – e.g. a retirement process, or a requirement to meet a statutory deadline (for example, send a pension saving statement.</p>

	10 working days otherwise. For larger data requests, a timeframe will be set at the time of the request.
Refunds through payroll: If a member opts out within 3 months of starting, the contributions deducted should be refunded through payroll (as required by the LGPS Regulations).	As per description.

C). Other ad-hoc employer responsibilities

Other ad-hoc and less frequent employer responsibilities are outlined below:

1). Review of Tier 3 Ill Health Benefits

Description		Employer target (working days)
1.1	To review Tier 3 ill-health pensions in payment after 18 months of commencement and, if required after 3 years.	As per description
1.2	To notify member in writing if Tier 3 pension ceases.	As soon as is reasonably practical after IRMP advice.
1.3	To notify member of any uplift from Tier 3 to Tier 2 benefits.	Provide Fund with relevant ill health certificate signed by IRMP within 10 days and notify the member as soon as is reasonably practical

2. Early payment of deferred benefits on grounds of ill health

Description		Employer target (working days)
2.1	Acknowledge any request for early payment on ill-health grounds made by the member (and former employee)	Request acknowledged within 5 days.
2.2	Employer to arrange for IRMP referral	Within 15 days

2.3	Notification to member of any award determined.	Within 10 days of decision being made following IRMP assessment.
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3). Additional Pension Contributions (APCs)

Description		Employer responsibility and target (working days)
3.1	Send any new, completed APC contacts to the Fund.	Employer to deduct extra contributions from member's pay based on the instructions set out on the form within 10 days of instruction from the Fund or the next available payroll, whichever is soonest
3.2	Lost pension contract (enquiry/application sent to scheme employer) Note: Applications for buying back the lost pension must be within 30 days of the member returning to work for the member to only pay 1/3 and the employer to contribute 2/3. (If there is an administrative delay the employer can extend the 30 day limit to share the cost)	Employer to provide a quote to the member detailing the amount of lost pay/pension as soon as the members return to work is confirmed. Employer to provide application to the Fund within 10 days of receipt of members election to proceed.

4. Internal Dispute Resolution Procedure (IDRP) Stage 1 Appeal against determination of scheme employer

Description		Employer target (working days)
4.1	Acknowledgement sent to applicant on receipt of Stage 1 application	Within 5 days of request
4.2	Forms to be issued to the employer's Stage 1 adjudicator	Within 2 days
4.3	Stage 1 adjudicator to give written notice of the decision to the applicant and a copy to the employer and to the Fund (this should also include information on further appeal rights under Stage 2)	Within 2 months of the date on which the application was received If no such notice can be given by this date an interim reply should be issued

		with an explanation as to the reasons for the delay and an expected decision date
4.4	The Employer to act on any actions arising from the Stage 1 decision The Fund to act on any actions arising from the Stage 1 decision, if appropriate after the employer has carried out their actions (this could include recalculation of the applicant's benefits)	Within 10 days of receiving the decision

5. Internal Dispute Resolution Procedure -Stage 2 – Appeal against the employer

Description		Employer target (working days)
5.1	Acknowledgement sent to applicant on receipt of Stage 2 application	Within 5 days of request
5.2	Forms to be issued to the fund/employer's Stage 2 adjudicator	Within 2 days
5.3	Stage 2 adjudicator to give written notice of the decision to the applicant and a copy to the employer and to the Fund (this should also include information on further appeal rights)	Within 2 months of the date on which the application was received If no such notice can be given by this date an interim reply should be issued with an explanation as to the reasons for the delay and an expected decision date
5.4	If applicable the Employer to act on any actions arising from the Stage 2 decision The Fund to act on any actions arising from the Stage 2 decision, if applicable after the employer has carried out their actions (this could include recalculation of the applicant's benefits)	Within 10 days of receiving the decision

6. TUPE and Employer Discretions

6.1	TUPE transfers out (if they occur): Inform WPF of all cases where a prospective new employer or admitted body may join the fund as the result of reorganization or TUPE transfers and to pay all charges due under WPF charging policy.	Notify the Employer Relationship Manager at least 3 months before the date of the transfer or reorganisation and ideally before any tender process commences (if relevant).
6.2	Change of payroll provider: Advise the Fund of the change and work with Fund officers to put appropriate processes in place and to enable staff to be trained.	At least 3 months before the change occurs
6.3	Employer Discretions Policy	To produce and maintain an employer's discretion policy with 3 months of joining the Fund and within 3 months of being advised of any changes to legislation.

Appendix 2: Fund Service Targets

The Fund has split its processes into three different priorities levels, which are defined as follows, in order to manage its resources effectively.

Priority Level	Definition
High priority	<ul style="list-style-type: none">• The process is expected to result in a payment directly to the member (or a beneficiary) in the near future; or• Key statutory deadlines exist.• Answering queries related to high priority case work.
Medium priority	<ul style="list-style-type: none">• The process does not result in a payment directly to the member, but the task still needs to be completed by Fund officers and a failure to complete the task in a timely manner could result in subsequent complications or delays (for example to high priority cases).• All standard queries (except those related to high priority cases).
Low priority	<ul style="list-style-type: none">• The member is able to self-serve this information using My Wiltshire Pension but has requested for the Fund to provide this information instead.

Note: All timeframes stated below exclude 'out of office' time, whether that is waiting for a response from the employer, member or an (independent) third party such as another Pension Fund.

The priority levels help determine the Fund's management of tasks in busy times and inform the setting of target levels, the approach to governance reporting and the level of urgency assigned to taking remedying action.

Overview and 'tolerable' thresholds

In recognition, of the complexity that exists in certain cases and the reliance the Fund sometimes has on other parties, the Fund is aware there will be occasions where it is unrealistic for these targets to be met for certain cases. Therefore, the Fund has set a tolerable performance threshold (the minimum acceptable levels) which includes an allowance for these exceptions. The tolerable percentage is defined as the percentage of successful completions in each category that the Fund considers to be the minimum acceptable level of performance without further action being required.

A summary of all higher volume processes is outlined in the table below. This is followed by a more detailed description for each target (which also includes the lower frequency events).

Task number	Priority Level	Task Description	Turnaround time (Working days) – excludes ‘out of office’ query time)	KPI (Minimum Acceptable level)	Disclosure Regulations requirement
1.1/1.2	High	Active to retirement quotes	5 days (unless the request is received before the retirement date, in which case, 10 days)	95%	1 month after NPA
1.3	High	Process actual retirement	10 days	95%	None
2.1	High	Retirement from deferred status – issue quote from request (only applicable if online process not used)	10 days	95%	1 month
2.2	High	Retirement from deferred status – process benefits from date of instruction.	10 days	95%	None
5.1	High	Death benefits – acknowledgement of death	5 days / 10 days	95%	None
5.2	High	Notification of benefits payable to dependants – process and sending letter	10 days	95%	None
5.3	High	Death grants – make determination and process	10 days / 20 days	95%	None
6.1	High	Refund payment requests – process	10 days	95%	None
7.1	High	Scheme employer led estimate requests (redundancy) – issue quote	10 days	95%	None
11.1	High	Produce Annual Benefit Statements	31 August	99%	31 August
11.2	High	Send out AVC statements (legacy providers only)	31 August/within 4 weeks of receipt	100%	31 August
11.3	High	Issue Pension Saving Statements for Annual Allowance	6 October	95%	6 October
12.1	Medium	Issue starter packs	1 month from date of receipt	95%	1 month
13.1	Medium	Early leaver disclosure notification	2 months from date of receipt	95%	2 months
14.1	Medium	Deferral of benefits – process	20 days from the date deferred benefits are established	90%	None

15.1	Medium	Internal aggregation: A1, B1, D1	2 months from date that need to aggregate occurs (a new starter or leaver)	90%	None
15.2	Medium	Internal aggregation: D2, D3	1 month from the date of the member's election	90%	None
15.3	Medium	Internal aggregation: A2, B2 & C2	1 month from election or 13 months from starting otherwise	90%	None
15.4	Medium	External aggregation – transfer in	1 month from receiving payment and all required information.	90%	None
15.5	Medium	External aggregation – transfer out	1 month from all information being in place	90%	None
17.1	Medium	Divorce – issue quote	20 days	90%	3 months from request
17.2	Medium	Divorce – Implement Pension Sharing Order	25 days from receipt of all required information	90%	4 months from receipt of all information
18.1	Medium	Transfer in – quotation	15 days	90%	2 months from date of request
18.2	Medium	Transfer in – Issue member with letter	20 days	90%	None
19.1	Medium	Transfer out – Make payment	20 days	90%	None
20.1	Medium	Respond to general enquiries	5 days / 10 days	90%	None
21.1/21.2	Low	Member led estimate – issue estimate	20 days	80%	2 months
21.3	Low	Transfer out quote – provide quote	20 days	80%	3 months
21.4	Low	New Expression of wish completion	20 days	80%	None
21.5	Low	Change of name or address	20 days	80%	None

High priority processes – more detailed explanation

1. Retirements (from active status)

Description		Fund target (working days)	Disclosure Legal Requirement
1.1	Voluntary Retirement: Quote and options issued	The Fund will issue the member with a quote and claim forms within 5 days of receipt of all the required retirement information (and AVC fund value if applicable), or 10 days if the request is received before the retirement date. <i>(Note: This process is currently being reviewed and may be replaced with a member-led process)</i>	No later than 1 month after Normal Pension Age. OPPS Regs 2013 20(2)
1.2	Ill Health and redundancy retirement: Options issued	The Fund will issue the member with a quote and claim forms within 5 days of receipt of the retirement notification and ill health certificate (and AVC fund value if applicable).	No later than 1 month after Normal Pension Age. OPPS Regs 2013 20(2)
1.3	Retirement benefits paid (all active retirement types)	The Fund will process benefits for payment within 10 days of receipt of correctly completed member forms (and receipt of AVC funds, if applicable). The lump sum will be paid on next council pay run (usually a further 5 working days after the Fund has processed the benefits). The first monthly pension will be paid on next available pensions payroll run. Note: No retirement benefits can be paid out before the retirement date.	N/A

2). Retirements from deferred status (excluding ill health) early payment

Description		Fund target (working days)	Legal Requirement
2.1	Retirement quote and options issued	The member will be issued with a quote and claim forms within 10 days of request (if member has an AVC then fund value will also need to be received by the provider) Note: This process is also available online.	1 month
2.2	Retirement benefits paid	Benefits processed for payment within 10 working days of correctly completed forms (and receipt of AVC fund, if applicable). Lump sum payment made on next council pay run (usually a further 5 working days after the Fund has processed the benefits) First monthly pension paid on next available pensions payroll run	N/A

3. Early payment of deferred benefits on grounds of ill health

Description		Fund target (working days)	Legal Requirement
3.1	Member notified of benefits due, in relation to the award determined by the employer	The Fund will send a letter or email within 10 days of the fund obtaining all relevant information required by the employer	N/A
3.2	Retirement benefits paid.	The Fund will process the benefits for payment within 10 days of receipt of correctly completed member forms. The lump sum will be paid on next council pay run (a further 5 days) The first monthly pension will be paid on next available pensions payroll run.	N/A

4. Review of Tier 3 Ill Health Benefits

Description		Fund target (working days)	Disclosure Legal Requirement
4.1	To review Tier 3 ill-health pensions in payment after 18 months of commencement and, if required after 3 years.	The Fund will issue a reminder letter to the employer 25 days prior to the 18-month review.	N/A
4.2	To notify member in writing when Tier 3 pension ceases.	(If applicable) The Fund will stop the Tier 3 pension in payment and notify the member within 10 days of all required documents from employer.	N/A
4.3	To notify member of uplift to Tier 2 benefits.	(If applicable) The Fund will award and notify the member of the Tier 2 uplift within 10 days of receipt of the all required documents from the employer.	N/A

5. Death benefits

Description		Fund target (working days)	Legal Requirement
5.1	Acknowledgement of death and request for further information made	<p>Next of Kin/Family member notifications: The Fund will send an acknowledge and request for further family details within 5 days of being notified of the death.</p> <p>Third party notifications (e.g. tracing agents, National Fraud Initiative): The Fund will write to the last known address of the deceased within 10 days of receiving the third-party notification, to try to establish the next of kin. If no response is received, the Fund will contact a tracing agent within 3 months of the third party notification to establish the next of kin and executor of the estate (if any).</p>	N/A

5.2	Notification of benefits payable to dependants	The Fund will send a final confirmation letter of amounts payable and process the payments within 10 days of receipt of all required information. The first monthly payment will be paid on the next available pay run.	2 months from date of notification of the death. OPPS Regs 2013 – Reg 21.
5.3	Death grant paid	Complex cases: Determination and payment instruction made within 20 working days of the Fund receiving all required information (excludes query time) Non-complex cases: Determination and payment instruction made within 10 working days of the Fund receiving all the required information (excludes query time)	N/A

6. Refund payments

	Description	Fund target (working days)	Legal Requirement
6.1	Refund payments	The Fund will process the refund ready for payment within 10 days of receipt of all necessary information from the member/employer. The actual payment will be made within a further 5 days.	None

7. Estimate requests (employer led)

	Description	Fund target (working days)	Legal Requirement
7.1	Scheme employer led estimate requests (redundancy/flexible retirement)	The Fund will issue the employer with the strain costs and a summarised member quote within 10 days of receipt of all the required information. If the employer requests that the Fund issues a detailed quote direct to the member, this will be issued within 5 days.	N/A

8. Complaint management

Description		Fund target (working days)	Legal Requirement
8.1	Responding to scheme members complaints	The Fund will issue an acknowledgement of the complaint within 5 days of its receipt.	None
8.2	Issuing full response to members complaints	A full response to the complaint will be issued within 25 days	None
8.3	Monitoring IDRPs cases in accordance with Stage 1 and Stage 2 reviews	An IDRPs response will be issued within 2 months (see the Fund's full IDRPs procedure)	None

9. Internal Dispute Resolution Procedure (IDRP) Stage 1 – Appeal against determination of WPF

Description		Fund target (working days)	Legal Requirement
9.1	Acknowledgement sent to applicant on receipt of Stage 1 application	Within 5 days of request	N/A
9.2	Forms to be issued to the Fund's stage 1 adjudicator	Within 5 days of request	N/A
9.3	Stage 1 adjudicator to give written notice of the decision to the applicant and a copy to the Fund (this should also include information on further appeal rights under Stage 2)	<p>Within 2 months of the date on which the application was received</p> <p>If no such notice can be given by this date an interim reply should be issued with an explanation as to the reasons for the delay and an expected decision date</p>	<p>Within 2 months of the date on which the application was received</p> <p>If no such notice can be given by this date an interim reply should be issued with an explanation as to the reasons for the delay and an expected decision date</p> <p>LGPS Regs 2013 75 (1)</p>

9.4	The Fund to act on any actions arising from the Stage 1 decision	Within 10 days of determination of receiving the decision	N/A
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10. Internal Dispute Resolution Procedure (IDRP)- Stage 2

Description		Fund target (working days)	Legal Requirement
10.1	Acknowledgement sent to applicant on receipt of Stage 2 application	Within 5 days of request	N/A
10.2	Forms to be issued to the fund/employer's stage 2 adjudicator	Within 10 days	N/A
10.3	Stage 2 adjudicator to give written notice of the decision to the applicant and a copy to the employer and to the Fund (this should also include information on further appeal rights)	Within 2 months of the date on which the application was received If no such notice can be given by this date an interim reply should be issued with an explanation as to the reasons for the delay and an expected decision date	Within 2 months of the date on which the application was received If no such notice can be given by this date an interim reply should be issued with an explanation as to the reasons for the delay and an expected decision date
10.4	If applicable the Employer to act on any actions arising from the Stage 2 decision The Fund to act on any actions arising from the Stage 2 decision, if applicable after the employer has carried out their actions (this could	Within 10 days of receiving the decision	Within 2 months of receiving all documentation from member/employer or to provide a holding reply for a further 2 months with explanation as to why no decision can yet be reached. LGPS Regs 2013 75(1)

	include recalculation of the applicants benefits)		
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11. Annual member statements

	Activity	Fund (and legal) target
11.1	<p>Annual Benefits statements (ABS) All active and deferred members are issued an ABS for the year ending 31st March</p>	All ABSs to be published on My Wiltshire Pension by 31 st August or sent via post if the member has requested paper statements.
11.2	<p>Additional Voluntary Contribution (AVC) annual statements The Fund's is required to send out year end statements from the legacy AVC providers to relevant members. The legacy AVC provider produces the statements.</p>	All legacy AVC statements to be issued by 31 st August following the most recent year or within 4 weeks of receipt if later. Prudential are responsible for issuing their own statements.
11.3	<p>Pension Saving Statements (PSS) for Annual Allowance All members who have exceeded the standard Annual Allowance are issued a PSS for the year ending 5th April</p>	All PSSs to be issued by 6 th October following the tax year end date (providing the employer has submitted all required data)

Medium priority processes

12). Starters Packs

Description		Fund target (calendar days)	Legal Requirement
12.1	To issue a starter pack	To issue a starter pack with one calendar month of the date starter notifications were due to be uploaded to i-Connect (19 th of the month following submission)	1 month from receipt of data from the employer. (OPPS Regs 2013 6(5)) Also, 2 months from the start date (OPPS Regs 2013 6(6))

13). Early leaver disclosure information

Description		Fund target (working days)	Legal Requirement
13.1	Early leaver options letter	To provide a generic statement of the member's rights within 2 months of receipt of the leaver information (unless specific leaver information has already been provided). For members eligible to receive a refund, to advise members of the refund and transfer amount within 2 months of receipt of the leaver information.	2 months from date of leaving OPPS Regs 2013 16(3)

14). Deferred benefits

Description		Fund target (working days)	Legal Requirement
14.1	Confirmation of deferral of benefits.	Member notified of deferred benefit entitlement within 20 days of the leaver notification (excluding any time where WPF is waiting for a query response from the employer)	None

15). Internal and external (intra-fund) aggregation of LGPS benefits

Description		Fund target (working days)	Legal Requirement
15.1	Internal aggregation of active member benefits with frozen refund benefits (A1, B1, C1, D1)	The Fund aggregate these benefits within 2 months of receiving notification from the employer of the new starter or leaver information (as relevant). Note: the member has no other option in these circumstances.	None
15.2	Internal aggregation of active member benefits with pre-2014 benefits (D2 & D3)	The Fund will notify the member of the option to aggregate these benefits as part of the starter pack issued by the Fund. The Fund will aggregate these benefits within 1 month of receiving a positive election form.	None
15.3	Internal aggregation of active member benefits with pre/post or post 2014 benefits (A2, B2 & C2)	The Fund will notify the member of the option to aggregate or keep these benefits as part of the starter pack issued by the Fund. If the Fund does not receive an election from the member, the Fund will formally aggregate these benefits within one month of 12 month election window expiring (i.e. after 13 months from starting) If the Fund does receive a positive election within the 12 month window, the Fund will aggregate the benefits within 1 month of receiving that election. If the Fund receives a negative election, no further action will be required.	None
15.4	Intrafund/external aggregation – transfer in	The Fund will process the aggregation with 1 month of receiving the required data and payment from the other Fund. The Fund will attempt to identify such aggregations, using the NI database, on a quarterly basis.	None
15.5	Intra-fund/external aggregation – transfer out	The Fund will process the aggregation and make payment within one month of receiving all the required information, including a positive election. If no election is received, the Fund will make the payment within one month of the 12 month election window expiring.	None

16). Additional Pension Contributions (APCs)

Description		Fund target (working days)	Legal Requirement
16.1	Extra pension contract (application sent direct to the fund)	On receipt of extra pension application from a member, to issue the employer with an instruction to deduct extra contributions within 10 days of application from the member and to update the pension record within 10 days of application.	N/A
16.2	Lost pension contract	To set up a contract on the pension database within 10 days of receiving the application from the employer	N/A

17. Divorce: Provision of quote

Description		Fund target (working days)	Legal Requirement
17.1	Issue pension quotation to member.	Within 20 days of all required information being received	3 months from date of request. (Source: The Pensions on Divorce etc. (Provision of Information) Regulations 2000)
17.2	Implementation and notification of Pension Sharing Order (PSO).	Within 25 days of receipt of all required information being received	4 months from receiving all required information and admin charges.

18). Transfers in

Description		Fund target (working days)	Legal Requirement
18.1	Transfer in quotation	Member issued with a quotation within 15 days of receiving CETV of previous pension benefits.	2 months from date of request OPPS Regs 2013 14(4)
18.2	Transfer in completion confirmation	Member issued with confirmation letter within 20 days of receiving all Funds and other information required.	N/A

19). Transfer out payments

Description		Fund target (working days)	Legal Requirement
19.1	Transfer out payments	Payment made to new pension scheme within 20 days of receipt of all relevant documents	N/A

20). General enquiries

Description		Fund target (working days)	Legal Requirement
20.1	Responding to scheme members email and written requests	Response issued within 10 days <u>Note:</u> In some circumstances this may be an acknowledgement of receipt with next steps outlined rather than a full resolution.	None

Low priority processes

These tasks are treated as lower priority processes, because in all cases, members can generate this information themselves using the member self-service portal, My Wiltshire Pension.

21. My Wiltshire Pension tasks

Description		Fund target (working days)	Disclosure Legal Requirement
21.1	Member led estimate requests (active members)	Member issued with quotation within 20 days of the Fund receiving all required information.	2 months from date of request (automatically fulfilled through self-service) OPPS Regs 2013 Reg 16(3)
21.2	Member led estimate requests (deferred members)	Member issued with quotation within 20 days of completion of estimate request form	2 months from date of request (automatically fulfilled through self-service) OPPS Regs 2013 Reg 16(3)
21.3	Transfer out quotation (including requests from Financial advisors)	Member issued with required information within 20 working days of receiving all the required information.	3 month from the date of request (automatically fulfilled through self-service functionality) OPPS The Occupational Pension Schemes (Transfer Values) Regulations 1996, 11 (1B)
21.4	Entering or altering expression of wish details.	Within 20 working days of receiving of receiving all the required information.	
21.5	Change of name or address	Within 20 working days of receiving of receiving all the required information.	

Appendix 3: Employer escalation policy

1. Introduction

The purpose of this policy is to outline the Fund's approach to resolving any data, processing and payment issues with employers.

The Fund wishes to work closely in partnership with all its participating employers to enable it to efficiently and effectively administer their employees and former employees' pensions. The Fund also works in a highly legislated, complex environment which means that its data requirements are not always straightforward, yet it is required to process data within certain timeframes to remain compliant with legislation and also to provide high quality customer service to members. The Fund also considers onboarding on to i-Connect to be a mandatory employer requirement and therefore, a failure of an employer to onboard onto i-Connect will also be considered under this policy

The aspiration of the Fund is always to focus on preventative approaches with employers, such as training and support, to limit the occasions when an escalation of issues is necessary. As part of the Fund's 2022 business plan, the Fund is committed to providing improved employer training materials and periodic performance reporting to employers.

2. Scope of this policy

The policy covers the Fund's approach to all data and payment issues outlined within the Pension Administration Strategy.

3. Approach

The Fund will monitor employers' performance against the targets set out within the Pension Administration Strategy and will use the approach outlined in section 4 where the timeframes are breached.

In all cases, the Fund wishes to work closely and support the employer to resolve the issues identified.

The approaches outlined in section 4 are a guide to the approach the Fund will use, and the Fund reserves the right to take an alternative approach where it is necessary and proportionate to do so.

4. Escalation approaches by process

a). i-Connect administration submissions (if relevant) and payment of contributions – indicative process

	Issue identified	
	Return or contributions not received by the deadline	Materially incorrect or a poor-quality return is received
<p>i). Monthly i-Connect upload</p> <p>ii). Rectifying queries identified by i-Connect.</p> <p>iii). Payment of employer and employee contributions (Starts at step 2).</p>	<p>Step 1: <u>7 days prior to deadline (i-Connect only)</u> A reminder email will be sent by the i-Connect system to the appropriate i-Connect employer contact, as identified by the employer.</p> <p>Step 2: <u>3 Working days after deadline</u> If an i-Connect file has still not been processed, then a late reminder email will be sent by the i-Connect system. For late contribution payments, the Fund’s accounts team will contact the designated contact.</p> <p>Step 3: <u>7 Working days after deadline</u> If no response is received, the Employer Services/Accounts team will make further contact with the employer and escalate the matter to more senior roles within the employer’s structure.</p> <p>Step 4: <u>If step 3 does not promptly resolve the matter</u> If issues remain, the Fund will consider and apply further steps such as:</p> <ul style="list-style-type: none"> • Escalation to more senior roles within the employer and/or the Fund; and/or • The implementation of an administration surcharge; • Write to Scheme members (employees to make them aware of the issues) and/or • Reporting the matter to the Pension Regulator. 	<p>1.) The Fund’s Employer Services team will highlight any errors or suppressions that have not been resolved prior to processing. They will send an email to the appropriate employer contact, as identified by the employer within 10 working days of submission. Issues must be resolved by the employer prior to the next monthly submission.</p> <p>2.) If issues are not resolved by the employer prior to the next monthly submission the matter will be referred to the Employer Relationship Manager who will phone and/or email the employer contacts, escalating to more senior roles within the employer’s and Fund’s structure as necessary.</p> <p>3). If errors persist, the Fund will consider and apply further steps such as:</p> <ul style="list-style-type: none"> • Escalation to more senior roles within the employer and/or the Fund; and/or • The implementation of an administration surcharge; • Write to Scheme members (employees to make them aware of the issues) and/or • Reporting the matter to the Pension Regulator.

Repeated issues:

In addition to the escalation approach above, if after resolving the issues relating to a particular month, similar issues occur again on more than one occasion, the Fund reserves the right to move towards the final steps on the escalation process labelled above.

b). Individual benefit administration cases and other ad-hoc requests – indicative process

Note: For particularly urgent cases, the timeframes outlined below may be condensed.

Issue identified	
Information not received by the deadline or in the stated timeframe	Materially incorrect or poor-quality information is received
<p>Step 1: <u>Deadline missed</u> A member of the Employer or Member Services team will send a reminder email and, if appropriate, a phone call.</p> <p>Step 2: <u>5 working days after the reminder in step 1</u> If no response is received, a further email will be sent to the same email address and also to the employer's main pension contact. A phone call may also be made.</p> <p>Step 3: <u>10 working days later</u> If no response is received, the matter will be referred to the Employer/Member Services Manager or Employer/Member Services Work Management Officer who will phone and email the employer contacts, escalating to more senior roles within the employer's structure.</p> <p>Step 4: <u>If step 3 does not resolve the matter</u> If issues remain, the Fund will consider and apply further steps such as:</p> <ul style="list-style-type: none">• Escalation to more senior roles within the employer and/or the Fund; and/or• The implementation of an administration surcharge;• Write to Scheme members (employees to make them aware of the issues) and/or• Reporting the matter to the Pension Regulator.	<p>1). A member of staff will summarise the area of concern and email the appropriate employer contact with these, offer further explanation and support and set out a timeframe for re-submission.</p> <p>2). If problems persist, the team will offer further support and assistance, including if appropriate and practical, a face to face visit.</p> <p>3). If the employer does not engage with the support offered or fails to respond, steps 2 onwards from the adjacent column will apply.</p>

Repeated issues:

In addition to the escalation approach above, if after resolving the issues relating to a particular month, similar issues occur again on more than one occasion, the Fund reserves the right to move towards the final steps on the escalation process labelled above.

d). General data and employer engagement issues

Where general data or employer engagement issues arise, normally as highlighted by the Fund analysis of an employer's data submission against the timeframes within this document, the Employer Relationship Manager, or a suitable colleague, will initially offer support and training and seek the engagement of a senior member of the employer concerned. If the approached outlined is unsuccessful, the matter will be raised internally with the Fund and the Fund will take an approach which is proportionate with the issue faced which could be further support or the levy of additional administration charges, as outlined in section 5 below, and reporting to the Pension Regulator.

5). Administrative charges

In conjunction with the Fund's charging policy, where the Fund considers that it has incurred additional costs (including officer's time) as a result of an employer's poor level of administrative performance, Regulation 22 of the Local Government Pension Scheme Regulations 2013 allows the Fund to recover these costs.

The Fund very much considers this approach a last resort which it will only use if it feels it has exhausted all other reasonable means of improving the employer's performance.

Where such a situation arises, the Fund will apply a charge based on a double of the hourly rate of staff involved multiplied by the estimated number of hours involved. The Fund will raise an invoice for such a charge and provide a breakdown of the charge and send it to the employer accordingly.

Note i: Where orders or instructions issued by The Pensions Regulator, the Pensions Ombudsman or other regulatory body require financial compensation or a fine to be paid by Wiltshire Pension Fund, or by any officer responsible for it, and it is due to the default, omission or otherwise negligent act of the employer, the sum concerned will be recharged to the employer.

Note ij: In addition, where the Fund incurs costs related to the stage 1 review of the Internal Dispute Resolution Procedure (IDRP) which are due to an employer's action or lack of action, these costs will be charged to the employer. Similarly, the employer will pay for all costs where the IDRP is aimed solely at the employer and the costs will be apportioned between employer and Fund where the IDRP is targeted at both the Fund and employer.

Appendix 4: Overriding legislation

Introduction

Overriding legislation dictates the minimum standard by which the WPF and Scheme Employers must meet in providing various items of information. In addition, regulatory guidance sets out a number of requirements for the Fund and scheme employers to provide information to each other, scheme members, prospective scheme members and dependants.

Relevant legislation

In discharging their roles and responsibilities under the LGPS Regulations, the Administering Authority and scheme employers are required to comply with the following regulations, which require scheme employers to supply information on time.

- The Occupational Pensions Schemes (Disclosure of Information) Regulations 1986;
- The Pensions Act 1995;
- The Disability Discrimination Act 1995;
- The Data Protection Act 2018;
- The Freedom of Information Act 2000;
- The Pensions Act 2004;
- The Finance Act 2004;
- The Discretionary and Compensation Regulations 2006;
- The Age Discrimination Act 2006;
- The Pensions Act 2008;
- Employment Rights Act 2010;
- Public Services Pension Act 2013;
- The Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014;
- The Pensions Regulators Code of Practice no.14 Governance and Administration of Public Service Pension Schemes

The Pensions Acts provide for fines to be levied on Pension Scheme Administrators, where information is not processed in a timely manner.