



Pension Administration Strategy (Draft)

October 2024

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1. Introduction

This is the Pension Administration Strategy (the Strategy) of Derbyshire Pension Fund (the Fund) in relation to the Local Government Pension Scheme (LGPS), which is administered by Derbyshire County Council (the Administering Authority).

The LGPS is a statutory scheme and governed by regulations. The current regulations relating to administration are The Local Government Pension Scheme Regulations 2013 (as amended).

The following link to the Local Government Association's (LGA) "LGPS Regulations and Guidance" website provides an up-to-date version of the LGPS Regulations 2013, including changes made subsequently through amending statutory instruments:

lgpsregs.org/schemeregs/lgpsregs2013

The Administering Authority and the Fund's employers are required to comply with any relevant overriding legislation. This includes following any regulatory guidance or Code of Practice issued by The Pensions Regulator in discharging their roles and responsibilities under these regulations regarding:

- data quality
- completeness
- timeliness

The legal context for this Strategy is Regulation 59 of The Local Government Pension Scheme Regulations 2013, which allows Administering Authorities the opportunity to prepare a Pension Administration Strategy.

This Strategy sets out the standards of performance and best practice that the Administering Authority and the Fund's employers should aim to meet when carrying out their scheme functions. It is reviewed annually and will be revised to reflect changes to:

- LGPS regulations
- policies determined by the Administering Authority
- administrative practices executed by the Fund and its employers in fulfilling its functions

i-Connect is the standard method for the Fund's employers to submit member data to the Fund and is reflected as such in this Strategy.

Employers who have not engaged with the Fund on the process of implementing i-Connect must email the Fund (pensions.regs@derbyshire.gov.uk) to begin arrangements towards its implementation.

It is mandatory for all participating employers to implement i-Connect for the secure submission of monthly data to the Fund.

Unless the Fund allows an employer an exemption from i-Connect, costs incurred for the maintenance of separate procedures for receiving scheme member's data may be charged to employers who fail to adequately engage with implementation.

This strategy also includes a schedule of additional administration costs in accordance with Regulation 70 of the LGPS Regulations 2013, which provides scope for LGPS funds to recover costs where additional costs are being incurred due to an employer's performance level.

Performance levels achieved by both the Fund and scheme employers are reported:

- as part of a Pension Administration Report at the Administering Authority's Pensions and Investments Committee
- at Derbyshire Pension Board meetings
- in the Fund's Annual Report

This Strategy will be [is] published on the Fund's website (derbyshirepensionfund.org.uk/publications) and [has been] signposted to all participating employers in an Employer Newsletter. This will follow [is following] its formal approval by the Pensions and Investments Committee in its role as the Administering Authority of the Fund. A copy will also be [has been] submitted to the Secretary of State as required in Regulation 59.

2. Aims of the Strategy

The aims of this Pension Administration Strategy are to:

- support the provision of a high-quality pension service to Fund members delivered through efficient working practices
- clearly set out the respective roles and responsibilities of the Administering Authority and scheme employers
- ensure that the Fund operates in accordance with LGPS regulations and The Pensions Regulator's General Code of Practice
- set out the quality and performance standards expected of the Administering Authority and its scheme employers in relation to each other
- promote good working relationships and improve efficiency between the Administering Authority and its scheme employers for the benefit of Fund members
- provide a framework to enable administration costs relating to significant employer underperformance to be met directly by the employer responsible, rather than shared across all the employers in the Fund¹

The efficient delivery of the benefits of the scheme is dependent upon effective administrative procedures being in place between the Administering Authority and scheme employers, principally the timely exchange of accurate information in relation to scheme members.

This Strategy sets out the expected levels of performance of the Administering Authority and the scheme employers and provides details about the monitoring of performance levels.

The Strategy will be [is] implemented from [tbc] following consultation with the Fund's employers and will be kept under review and updated as required to reflect changes in scheme regulations and Fund working practices.

Derbyshire Pension Board, in its role of assisting the Administering Authority to ensure the effective and efficient administration and governance of the Scheme, will also monitor the operation of this Strategy: derbyshirepensionfund.org.uk/pensionboard

¹ Regulation 70 of the 2013 LGPS Regulations permits the recovery of additional costs from an employer where its level of performance has caused additional costs to the Fund

3. Record Keeping

Record keeping is an essential part of running a scheme such as the LGPS. Funds and their employers have a legal obligation to collate and maintain certain data, which is key to managing the scheme.

Derbyshire Pension Fund must keep accurate, up-to-date, and long-term records, within the parameters of data protection legislation to ensure it can govern and administer the Fund efficiently for all scheme members.

Employers provide the data needed by the Fund and must ensure that they are meeting their legal obligations to the scheme.

The Fund works to support employer meeting their LGPS responsibilities in the following ways:

- site visits or remote support
- training events
- electronic newsletters
- guidance and information on the Fund's website

The Fund has a legal duty to provide its members with accurate and timely information about their benefits, which cannot be issued without data from employers.

4. Development of the Fund's administration

This section provides information on areas where the Fund is developing its administration in order to improve efficiency and provide a better service for members.

4.1. i-Connect

i-Connect is a secure platform which automates the submission of pension data from an employer's payroll system to the Pension Fund each month. It is the Fund's primary source of scheme member data from employers.

The Fund's aim is for all participating employers to use i-Connect for submissions of monthly employee data who are members of the LGPS. Employers who do not engage with implementing i-Connect may be required to meet the costs of maintaining additional operational procedures.

i-Connect is an additional module of the Heywood pension administration platform. The i-Connect module allows the Fund's scheme employers to automate the transfer of member data from their payroll systems to the Fund's pension administration system (Altair) on a monthly basis.

By onboarding the Fund's scheme employers onto i-Connect, this efficient solution :

- reduces the need for manual inputting of pension related data
- allows ongoing data validation and a timelier resolution of queries
- reduces the workload of year-end reconciliation and reporting
- ensures the maintenance of a stable and accurate membership database
- ensures the Fund receives data in line with statutory rules thus avoiding the risk of enforcement action and financial penalties by The Pensions Regulator for breaching legislative time limits and other requirements

Maintaining up to date member records ensures the accurate calculation of employers' pension contribution rates and the provision of a better service for fund members.

Employers who have not engaged with the Fund towards commencing arrangements for the implementation of i-Connect must contact the Fund's i-Connect team by email without delay: pensions.regs@derbyshire.gov.uk

The team supports each employer in its transition to the i-Connect method of data submissions.

Where the Fund considers that an employer has not taken reasonable steps towards the implementation of i-Connect, the employer may be invoiced for the costs incurred in maintaining alternative procedures for the administration of data relating to active members of the Fund outside of the i-Connect process.

Such charges may be levied annually for employers who fail to engage with the Fund and continue to submit data to the Fund outside of i-Connect.

For participating employers who are considered by the Fund not to have made reasonable efforts to implement i-Connect for the submission of data for a scheme year (1 April to 31 March), the charging structure is as follows:

- costs relating to the preparation and administration of non i-Connect documentation; **£1,500 per employer reference code²**
- costs of the Fund's administration for data submissions and other member reporting outside of i-Connect;
- **“Time spent” costs based on charges for officer time (Section 8 – Performance monitoring)**. These costs may be in addition to any other costs incurred due to an employer's poor performance, as detailed elsewhere in this strategy.

4.2. Member Self Service: My Pension Online

The Fund maintains a secure, online portal to allow its members to:

- browse certain parts of their pension information
- update some of their personal information
- project their pension benefits

This online service is called 'My Pension Online' and for registered scheme members, it is the Fund's default method of communication with members.

The Fund is continuing to promote this service to scheme members. Employers will be expected to assist in the promotion of the My Pension Online service and encourage their employees who contribute to the LGPS to register for the service.

My Pension Online is the default method for supplying annual statements to active and deferred members, however, all Fund members can opt to receive their annual statement by post.

² Where employers have multiple Fund reference codes, costs will be per code.

5. Roles and responsibilities

The aims of this strategy will be achieved by:

- clearly defining the respective roles of scheme employers and the Administering Authority
- setting clear and achievable standards of service levels for the functions carried out by scheme employers and the Administering Authority
- setting clear procedural guidance for the secure and effective exchange of information between scheme employers and the Administering Authority, including the mandatory implementation of i-Connect by all participating employers
- monitoring service delivery, identifying poor performance and establishing a platform for the provision of support to improve performance where required
- applying additional charges where an employer consistently fails to meet deadlines and standards set out in this strategy, including not engaging with the implementation of i-Connect

6. Employer role and responsibilities

This section summarises and provides more detail about the employer's responsibilities, and the performance standards employers are expected to achieve.

The primary responsibilities for the employer are to:

- **Communicate** details of the LGPS to eligible staff
- **Apply** the scheme regulations
- **Report** information and pay contributions to the Fund

The delivery of an efficient and cost effective administration is dependent upon a successful joint working partnership between the Fund and individuals within or representing the scheme employer.

Each employer is asked to designate a main contact to liaise with the Fund. This helps to support and develop a joint working partnership with the Fund.

6.1. Main contact for each employer – Principal responsibilities

The principal LGPS related responsibility for an employer's main contact for the Fund is to be the Fund's primary contact for all matters relating to the LGPS, including:

- ensuring that all administration matters such as data submissions, payments, forms and responses to queries from the Fund are provided within required deadlines (where applicable) or without undue delay as set out in this Strategy and/or LGPS and related legislation
- ensuring that any functions carried out by third-party providers (for example, payroll provider) comply with this Strategy and relevant legislation
- ensuring that all other LGPS related responsibilities are met as required, including:
- arranging authorisations for signing forms and approving retirements
- ensuring applications for LGPS benefits and information related to applications are submitted to the Fund without undue delays (including applications from former employees (for example ill health related))
- correctly applying LGPS contributions to an employee's payroll record
- ensuring LGPS information is provided to LGPS eligible employees in a timely manner when commencing or joining the scheme, and at other relevant times where employee's options are available or decisions required

- promoting the Fund's My Pension Online member self-service portal
- acting as the employer's first contact point for employees who are eligible for the LGPS in respect of matters relating to pension contributions, employee information and LGPS applications
- being the primary contact point on LGPS strategic matters such as:
 - LGPS funding
 - covenant issues such as Bonds, Guarantees etc (where applicable)
 - the triennial actuarial valuation
 - the employer's LGPS Discretions Policy
 - appointment of an Adjudicator for Stage 1 appeals under the Application for the Adjudication of Disagreements Procedure (AADP)
 - consultations which invite employer responses

The employer remains fully responsible for any functions (for example payroll services) which may be carried out by a third-party provider.

6.2. Summary of employer responsibilities

This section summaries the main employer responsibilities that an employer is expected to provide.

LGPS arrangements

It is an employer's responsibility to:

- ensure that the standards and levels of service set out in this strategy are met and relevant regulations are complied with
- notify the Fund of any changes/mergers to the organisation which may impact on participation in the Fund including transfer of staff under TUPE, mergers with other organisations or another decision which may materially affect the employer's Fund membership.
- inform the Fund of changes to payroll provider or any other service delivery arrangements
- notify the Fund of breaches of LGPS and related statutory regulations
notify the Fund of all applications received, and resultant decisions made under the Adjudication of Disagreements Procedure (AADP)

LGPS eligibility

An employer will be responsible for:

- determining the eligibility for Scheme membership of your employees
- bringing eligible employees into the LGPS
- dealing with opt outs or moves between different sections of the scheme

LGPS contributions

When an employee commences an LGPS eligible position or elects to join the scheme, it must:

- assess and determine the appropriate LGPS employee contribution rate in compliance with LGPS regulations based on pensionable pay in each eligible post
- review each employee's LGPS contribution rate on 1 April each year, and at other times at the employers' discretion
- notify the member of their LGPS contribution rate, or their revised rate where their assessed contribution rate has changed

LGPS employers must ensure that on a monthly basis:

- LGPS data and contributions are recorded correctly for each employment on, including where applicable, the application of Assumed Pensionable Pay, and any Additional Pension Contributions (APC) and / or Additional Voluntary Contributions (AVC)
- employer and employee pension contributions (including APCs) are collected and paid to the Fund by the 19th of each month
- AVCs are paid to the relevant AVC provider
- CR1 forms are submitted to the Fund by the 19th of each month to accompany each payment of contributions

LGPS data

It is an employer's responsibility to:

- notify the Fund when employees start, join the LGPS, move to the 50/50 section, opt-out or leave by the methods set out in this strategy and in a timely manner
- implement and maintain the Fund's i-Connect provision for the secure submission of monthly data
- ensure that monthly i-Connect submissions reach the Fund by the 19th of the next month
- ensure the accuracy and completeness of monthly i-Connect submissions, including any additional information requested at various times (for example, at year-end - 31 March)
- provide leaver information (L1 – Leaver Form) for all employees aged 55 or over at date of leaving and for other employees where additional details are requested by the Fund (L3 – Leaver Form)
- provide other current and historic information as required by the Fund (for example, archive payroll data to assist with the application of the McCloud remedy)

Employer decisions

Employers are expected to make appropriate decisions for employees when required:

- for retirement applications and considerations for ill health retirement
- for appeals by undertaking the employer role at Stage 1 within the Fund's Application for the Adjudication of Disagreements Procedure (AADP) and providing information as required for Stage 2 or cases escalated to The Pensions Ombudsman
- by preparing, publishing and maintaining an LGPS Employer Discretions Policy and supplying the Fund with a copy of the published policy when agreed, and at times when changes are made

LGPS communications

Employers should provide employees with relevant LGPS information at appropriate times by:

- sharing communications with LGPS members when requested by the Fund
- sharing the Fund's website in all relevant electronic information sources and communications which reference pension matters
- liaising and assisting the Fund on promotional activities, including the promotion of My Pension Online

6.3. Employer responsibilities – Roles, Functions and Performance Targets

The following tables set out in more detail each employers roles in respect of the administration of the scheme in the areas of:

- Scheme Governance and Administration
- Individual Member Administration

The performance standards expected are expressed as targets expected in normal circumstances.

On an exceptional basis, it is accepted that it may not be possible to achieve the target indicated and a pragmatic approach will be adopted. This is subject to employers using their best endeavours to meet expected standards wherever possible.

6.4. Scheme Governance and Administration

This section details the functions which relate to overall governance and administration, rather than functions that relate to individual scheme members' benefits.

Employer contacts

Notification to the Fund of employer contacts:

| Function / Role | Description | Performance Target |
|--------------------------------|---|--|
| Main contact | Nominate a named main contact to liaise with the Fund. Notification by completion of AS12 form available from the Fund on request. | Within 1 month of employer joining the Fund or change to nominated contact. |
| All Authorised Contacts | Designate and confirm other nominated representative(s) (Payroll, HR, Finance) to act on behalf of the employer in respect of administering the LGPS by submitting the Fund's Authorised Signatory forms to pensions.regs@derbyshire.gov.uk AS12 and AS2 Authorised Signatories forms are available from the Fund on request. | Within 1 month of becoming a scheme employer or within 1 month of a change in nominated representative(s). |
| Appeals Adjudicator | Appoint a person to consider appeals under Stage 1 of the Applications for the Adjudication of Disagreements Procedure (AADP) and provide full, up to date contact details to the Fund. Notify the Fund by email to pensions.regs@derbyshire.gov.uk | Within 1 month of becoming a scheme employer or within 1 month of a change in adjudicator. |

Employer Discretions Policy

Setting an Employer Discretions Policy and notifying the Fund:

| Function / Role | Description | Performance Target |
|---|--|---|
| Preparing an Employer Discretions Policy | <p>Formulate and publish policies in relation to all areas where the employer may exercise a discretion within the LGPS (including providing a copy of the policy document to the Fund).</p> <p>Guidance available Employer discretions - Derbyshire Pension Fund</p> | To be kept under review and a revised statement published within 1 month of any changes and no later than 6 months after being informed by the Fund of any relevant change in regulations. |

Pension Contributions

Applying, paying, and reporting of pension and AVC contributions:

| Function / Role | Description | Performance Target |
|--|--|--|
| The Employer's Rate | Apply the employer contribution rate agreed with the Fund on becoming a scheme employer and adjust as instructed by the Fund from a date determined by the Fund. | Immediately on receipt of information from the Fund, effective from a date determined by the Fund following advice from the scheme actuary. |
| The Employee's Rate | <p>Calculate and review the correct employee contribution rate band for all members at commencement and on 1st April each year. Also, to be reviewed at intervals during the year at the employer's discretion.</p> <p>Current employee contribution bandings and rates available at Paying in - Derbyshire Pension Fund</p> | Immediately on commencement, on 1st April each year and as per the employer's discretionary policy on adjusting the employee's contribution rate at intervals during the year. |
| Assumed Pensionable Pay | Ensure the correct application of Assumed Pensionable Pay (APP) during periods of reduced or nil pay in accordance with the LGA's payroll guidance notes and training. Information available at Assumed pensionable pay - Derbyshire Pension Fund | Review of eligibility for APP immediately upon a member moving to reduced / nil pay. |
| Payment to the Fund | Arrange payment of Employee, Employer and any additional contributions <u>and</u> submit the Contributions Report form (CR1) to the Fund. | By the 19th of the month after collection from pay. |
| Payment of AVCs | Arrange payment of Additional Voluntary Contributions (AVCs) to the AVC provider(s) . | By the 19th of the month after collection from pay. |
| Salary Sacrifice Shared Cost AVC arrangements | Notify the Fund of the commencement of Salary Sacrifice Shared Cost AVC arrangements. | Immediately on the commencement of arrangements. |

Data Returns

Submission of i-Connect data returns to the Fund or, where employers have an exemption for i-Connect, submission of a Year-End Return:

| Function / Role | Description | Performance Target |
|---|--|--|
| i-Connect (Secure Data Transmission Service) | Provide monthly, accurate and complete submission of i-Connect data in the format required. | By 19th of the month following the relevant calendar month. |
| Queries from i-Connect submissions | To promptly resolve all queries relating to entries on i-Connect monthly submissions. | To respond fully to all queries from the Fund within 7 working days of receipt of the query. |
| Year-End Return (Employers not yet live on i-Connect) | Provide an accurate, fully reconciled and completed year-end return in the format set by the Fund, in documentation issued by the Fund. Arrange payment without delay of charges for submitting data outside of i-Connect. | By the date set by the Fund in the April following the year-end. |
| Queries from a Year-End Return | To resolve all queries returned from the year-end return. | To respond fully to all queries from the Fund within 3 weeks of receipt of the query. In circumstances where an employer submits a late year-end return limiting the Fund's time to complete its duties, the timescales may be reduced, as advised by the Fund. |

Communications

Supply of pension data to new and existing LGPS eligible employees and security of data submissions to the Fund:

| Function / Role | Description | Performance Target |
|--|--|---|
| LGPS content in Contracts | Ensure pensions information is included as part of any new employment induction procedures and included in all contract / appointment / adjustment communications for LGPS-eligible positions including signposting to the Fund's website - derbyshirepensionfund.org.uk | Review pension related content annually or immediately on receipt of revised details for LGPS contractual enrolment. |
| Fund Communications to Scheme Members | Distribute any information provided by the Fund to scheme members / potential scheme members including the promotion of My Pension Online. Refer new or prospective scheme members to the Fund's website derbyshirepensionfund.org.uk/newjoiners | Within 2 weeks of its receipt. Within 2 weeks of commencement of employment or change in contractual conditions. |

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|----------------------|---|---|
| Data Security | In accordance with the Memorandum of Understanding , ensure that any personal data submitted to the Fund outside of i-Connect is sent securely. | Ensure the security of all non i-Connect submissions to the Fund at the point of sending. |
|----------------------|---|---|

Ill health related matters

Determination of eligibility for ill health retirement in respect of active and former employees in compliance with LGPS regulations and without undue delays.

Notification to the Fund of all decisions relating to pension eligibility as a result of ill health.

| Function / Role | Description | Performance Target |
|--|--|---|
| Appointment of Independent Registered Medical Practitioner (IRMP) | Appoint a suitably qualified IRMP to provide a medical opinion on eligibility for LGPS ill health retirement. | Appointed IRMP in readiness to provide medical opinion on cases without undue delay . |
| Determination of eligibility (active employees) | Arrange for IRMP opinion where member may be eligible for ill health retirement (for example absence trigger points, health condition) Determine eligibility for ill health retirement following receipt of IRMP opinion. Notify Fund of decision in all cases via full completion of Medical Certificate. | Decisions must be made as soon as possible following receipt of IRMP opinion. Notification to Fund within 1 week of decision. |
| Determination of eligibility (former employees) | Arrange for IRMP opinion immediately following receipt of application for ill health retirement from former employee. Determine eligibility for ill health retirement following receipt of IRMP opinion. Notify Fund of decision in all cases through full completion of Medical Certificate. | Decisions must be made asap following receipt of IRMP opinion. Notification to Fund within 1 week of decision. |
| Determination of eligibility (Ill Health Tier 3 cases) | Arrange for IRMP opinion to review eligibility for continuation of Tier 3 ill health pension at 18-month review and other times as required. Determine eligibility following receipt of IRMP opinion. Notify Fund of decision in all cases via full completion of Medical Certificate. | Decisions must be made asap following receipt of IRMP opinion. Notification to Fund within 1 week of decision. |

Appeals

Notification to the Fund of all appeals submitted through the Applications for the Adjudication of Disagreements Procedure (AADP):

| Function / Role | Description | Performance Target |
|-----------------------------|--|--|
| AADP Stage 1 Appeals | The Employer's Adjudicator to notify the Fund of the receipt of a Stage 1 appeal through AADP. Notifications by secure email to pensions.regs@derbyshire.gov.uk | Within 1 week of receipt of the appeal. |

| | | |
|-----------------------------|---|--|
| AADP Stage 1 Appeals | The Employer's Adjudicator to notify the Fund of the decision in respect of an appeal at Stage 1 of AADP. Notifications by secure email to pensions.regs@derbyshire.gov.uk | Within 1 week of the decision. |
| AADP Stage 2 Appeals | The Employer's Adjudicator to provide the Fund with all documentation considered in the determination of the Stage 1 appeal for consideration in the adjudication of the appeal at AADP Stage 2. | Within 1 week of the receipt of the request from the Fund. |

Outsourcing / TUPE arrangements

Notification to the Fund of the arrangements for outsourcing of services/functions involving the TUPE of LGPS eligible employees:

| Function / Role | Description | Performance Target |
|---|---|---|
| Initial notification to Fund of intention to outsource | Notify the Fund of contracting out of services which will involve a TUPE transfer of LGPS eligible staff to another organisation to enable LGPS information to be provided to potential contractors. Guidance available at derbyshirepensionfund.org.uk/admissionbodies | At the point of deciding to tender. |
| Lead contacts | Notify the Fund of the main contacts managing the outsourcing of service provision before and during a contract where a prospective contractor may request to join the Fund. Notification form is available at derbyshirepensionfund.org.uk/admissionbodies | At determination of successful tender. |
| Admission arrangements for new contractor | Work with the Fund to arrange for the admission of a contractor as a new employer in the Fund. | A minimum of 2 months in advance of the date of contract. |
| Contractual arrangements | Provide the Fund with relevant details, including copies of documentation, of agreements relating to responsibility for an LGPS funding deficit or surplus and requirements for Bond or Guarantor. | Within 1 week of the signed contractual agreement with the contractor. |
| Changes to the contract | Notify the Fund of changes / extension / cessation of arrangements with a contractor. | As soon as decision is agreed. |
| Management of Admission Agreement | Assist the Fund in ensuring that the terms of the contractor's admission as a scheme employer (Admission Agreement) are complied with. | Notify the Pension Fund if the terms of the Admission Agreement have been breached. |
| LGPS funding | Maintain awareness of the employer's responsibility as the ultimate guarantor for any unpaid LGPS funding deficits when contractor exits the Pension Fund. | Ensure those responsible for finance matters are aware of pension responsibilities in respect of contractor's LGPS funding. |

Strain / Shortfall Payments to the Fund

Payment to the Fund of shortfall / strain costs and charges in respect of discretionary compensation / enhancements:

| Function / Role | Description | Performance Target |
|---|---|---|
| Shortfall / Strain payments to the Fund | Make shortfall / strain payments to the Fund in respect of early payment of benefits from redundancy, business efficiency and flexible retirements or where a member retires early with employer's consent. | Immediate payment upon receipt of invoice from the Fund. |
| Payments in respect of discretionary compensation and enhancement arrangements | Arrange payment of recharges in respect of pension members for example discretionary compensation or enhancement. | Immediate payment upon receipt of invoice from the Fund. |

Miscellaneous

Other pension-related arrangements with the Fund:

| Function / Role | Description | Performance Target |
|--|--|---|
| Payments in respect of FRS102/IAS19 reports | Payments in respect of FRS102 and IAS19 work carried out on behalf of employers by the Fund and the Fund's Actuary. | Immediate payment upon receipt of invoice from the Fund. |
| Payment of other actuarial charges | Payments in respect of all other work carried out on behalf of or relating to the employer by the Fund's Actuary including matters connected to funding reviews and data quality assurance undertaken by the Fund. | Immediate payment upon receipt of invoice from the Fund. |
| Payment for specific Fund services | Prompt payment of invoices issued by the Fund for specific services provided. | Immediate payment upon receipt of invoice from the Fund. |
| Non-standard enquiries from the Fund | Respond to enquiries from the Fund. | Within 2 weeks from receipt of the enquiry. |
| Non-compliance charges | Make payment of additional costs to the Fund associated with non-compliance with performance standards of the scheme employer. | Immediate payment upon receipt of invoice from the Fund. |
| Breaches of legislation | Respond to enquiries from the Fund relating to breaches of legislation. | Within 1 week of the request. |

Individual Member Administration

This section details the functions which relate to scheme member benefits from the LGPS:

- **New Starters**

Provision of information about new starters / joiners:

| Function / Role | Description | Performance Target |
|--|---|---|
| Standard contract wording | Ensure Fund approved wording relating to pensions is included in all contract / appointment communications for LGPS-eligible positions including direction to the Fund's web presence and signposting to registration for My Pension Online: derbyshirepensionfund.org.uk | As part of standard contract / appointment templates. |
| Enrolment and assess contribution banding | <p>LGPS eligible employees must be entered into the scheme from the commencement of their employment, except for employees with a contract of less than 3 months or casual / relief employees.</p> <p>Employees not subject to contractual enrolment must be offered the opportunity to join the LGPS from commencement, or automatically entered upon meeting auto-enrolment criteria.</p> <p>Assess and apply the appropriate LGPS employee contribution rate.</p> | From date of commencement or joining the scheme. |

| Function / Role | Description | Return method | Performance Target |
|---|---|---|--|
| Notifying the Fund of new entrants | Notify the Fund of new LGPS joiners. Evidence of an employee's election to join must be retained and copied to the Fund on request. If an employee is entered into the LGPS incorrectly, the employer is responsible for the reimbursement of employee contributions. | Monthly submission of i-Connect data transmissions. | Within 1 month of member's entry into the scheme by contractual enrolment, auto-enrolment, re-enrolment date or election to join. |

- **Changes**

Provision of information about changes to personal details, employment information and unpaid absence details:

| Function / Role | Description | Return method | Performance Target |
|------------------------------------|---|---|---|
| Changes to personal details | Notify the Fund of change, or correction to, employees' personal details: Name, Address, Marital / Civil Partnership Status, Date of Birth, NI number | Monthly submission of i-Connect data transmissions. | Within 1 month of the event or receipt of information. |

| | | | |
|--|--|---|--|
| Changes to Employment Details | Notify the Fund of changes or corrections in employment details, including changes in hours and moving to or from the 50/50 section. | Monthly submission of i-Connect data transmissions. | Within 1 month of the event or receipt of information. |
| Notification of Unpaid Absences | Notify the Fund of periods of unpaid absence not covered by Assumed Pensionable Pay (APP). | Monthly submission of i-Connect data transmissions. | Within 2 months of the event or receipt of information. |
| Dismissal (Gross misconduct and recovery of financial losses) | Notify the Fund where recovery of financial loss is sought from the dismissed employee's pension. | Contact the Fund directly at pensions.regs@derbyshire.gov.uk | Within 3 months of the employee's date of conviction. |

- **Additional Pension Contributions (APCs)**

Payment and reporting of Additional Pension Contributions to cover lost pension due to authorised unpaid leave or industrial action, or to boost the member's pension at retirement:

| Function / Role | Description | Return method | Performance Target |
|---|--|---|--|
| Notification to member of APC option – Buying lost pension | Ensure members are notified of the option to pay Additional Pension Contributions following absences not covered by Assumed Pensionable Pay (APP). | Not applicable. | Notify member within 2 weeks of the return to work. |
| APCs – Buying lost pension | Apply APCs on receipt of application from member and notify the Fund with a copy of the application. | Not applicable. | Apply to next available payroll and notify the Fund within 1 month of receipt of members application. |
| APCs – Buying extra pension | Apply APCs on receipt of receipt of notification from Fund. | Not applicable. | Apply to next available payroll. |
| APC adjustments and ceasing | Apply adjustments to APC amounts on notification from Fund. | Not applicable. | Apply to next available payroll. |
| Provision of APC data to the Fund | Include APC payments in member notifications to the Fund. | Notification of payments to the Fund by monthly i-Connect submission (or year-end return for employers not on i-Connect). | 19 th of the month following the payment period. |

- **Additional Voluntary Contributions (AVCs)**

Payment and reporting of AVCs to Fund and AVC provider:

| Function / Role | Description | Return method | Performance Target |
|---|--|---|--|
| Application of AVCs to payroll | Arrange for the deduction of AVCs from scheme member's pay following notification from AVC Provider. | Not applicable. | Commence deduction of AVCs on the next available payroll as advised by payroll provider. |
| Payment of AVC contributions to AVC Provider | Ensure payment of AVC contributions to AVC provider within required timescale. | Not applicable. | AVCs must be paid over to the AVC Provider by 19 th of the following month. |
| Provision of AVC data to the Fund | Include AVC payments in member notifications to the Fund. | Notification of payments to the Fund by monthly i-Connect submission (or year-end return for employers not on i-Connect). | 19 th of the month following the payment period. |

- **Opt-Outs**

Actions upon a member opting out of the LGPS:

| Function / Role | Description | Return method | Performance Target |
|---|---|---|--|
| Stop employee contributions | Apply an election to opt out of the LGPS to the member's payroll record. | Not applicable. | From the 1 st of the month for the next available payroll. |
| Notification to the Fund (within 3 months of joining) | If the member opts out within 3 months of joining, they are treated as having opted out upon entry and the employer is responsible for refunding the pension contributions. (Employer to retain copy of Opt-out form and provide to Fund only on request) | Notification of opt out through monthly submission of i-Connect data transmissions. | Within 1 month of the opt-out being actioned on payroll. |
| Notification to the Fund (3 months or more from joining) | If the member opts out 3 months or more from joining, the Fund will determine if the member is eligible for a refund of pension contributions and contact them directly. (Employer to retain copy of Opt-out form and provide to Fund only on request) | Notification of opt out through monthly submission of i-Connect data transmissions. | Within 1 month of the opt-out date. Where the opt-out is made within 3 months and is backdated to the start date, an L1 – Leaver form must still be submitted showing the scheme leaving date as the first date of employment. |

- **Notifications of Leaver**


Notification of pay, contributions and other details in respect of leavers and retirements, including the accurate determination of the Final Pensionable Pay for all cases where the member had LGPS membership before 1 April 2014:

| Function / Role | Description | Return method | Performance Target |
|---|--|---|--|
| Leavers under age 55 | Notification of leaver. | By monthly submission of i-Connect member data. Also, submission of L3 Form where requested, for employees with pre-2014 membership. | Within 1 month of date of leaving / opt out date. |
| Leavers aged 55 or over | Notification of leaver. | Submission of completed L1 - Leaver form. | For members in receipt of regular pay where the employer can accurately project pay to the date of retirement, up to 1 month prior. For members in receipt of variable pay, within 1 week of finalising the member's last contractual pay. |
| Redundancy / Business Efficiency and Flexible Retirement | Notification of employer decision and authorisation for payment of pension benefits. | Submission of completed L1 - Leaver form <u>and</u> letter to provide evidence of decision and agreement to shortfall / strain costs | For members in receipt of regular pay where the employer can accurately project pay to the date of retirement, up to 1 month prior. For members in receipt of variable pay, within 1 week of finalising the member's last contractual pay |
| Ill health Retirement Active members | Notification of employer decision relating to ill-health retirements. | Submission of completed L1 – Leaver form <u>and</u> Ill-Health Medical Certificate. | For members in receipt of regular pay where the employer can accurately project pay to the date of retirement, up to 1 month prior. For members in receipt of variable pay, within 1 week of finalising the member's last contractual pay. |
| Death in service | Notify the Fund of the death of an Employee. | Provide Next of Kin details on an L1 – Leaver form. ³ | Provide an initial notification within 3 working days of the employer being informed of the death of the employee. |

³ To ensure the timely calculation and payment of pension benefits to members and, where applicable, beneficiaries, employers using i-Connect are still required to submit a fully completed L1 – Leaver form in all such cases.

- **Scheme members with a progressive life-limiting condition**

Notification of members with progressive life-limiting conditions:

| Function / Role | Description | Performance Target |
|--|--|--------------------|
| Serious ill health  | Notify the Fund by email or phone without delay for guidance if an employee with LGPS membership has a progressive life-limiting condition. | Not applicable. |



*Where life expectancy is less than 1 year, benefits payable may be significantly affected by whether a scheme member dies whilst still in employment or after the termination of employment on grounds of ill health. **Please notify the Fund urgently.***

Communication with scheme members in respect of formal appeals against pension-related decisions

Actions to take on receipt of an appeal made by a member in respect of a pension-related decision:

| Function / Role | Description | Performance Target |
|-------------------------------------|---|--|
| AADP Stage 1 Acknowledgement | The employer's adjudicator to acknowledge receipt of the Stage 1 AADP. | Immediately. |
| AADP Stage 1 Decision | Determine appeals against the employer at Stage 1 of AADP in accordance with The Local Government Pension Scheme Regulations 2013 (Regs 74 and 75). | Within 2 months of receipt of the appeal. (Where a decision cannot be reached within 2 months, notify the appellant of reasons for the delay and the date when a decision can be expected to be reached). |

7. The Administering Authority's roles and responsibilities

The responsibilities for the Administering Authority are to:

- administer the LGPS in respect of all scheme members (Active, Deferred and Pensioner members) in accordance with this Strategy
- maintain and review the Fund's policies, strategies, statements, reports, and all other matters relating to the governance of the scheme. The Fund's policies, strategies and statements can be viewed on the Fund's website: derbyshirepensionfund.org.uk/publications
- communicate and engage with employers on LGPS matters
- provide support and training to scheme employers
- maintain and develop an effective web presence for the benefit of members and scheme employers

The list of functions, which concentrates on the main roles, rather than being an exhaustive list, sets out the areas which involve interaction and liaison with scheme employers and / or scheme members.

7.1 Scheme Governance and Administration

This section outlines the responsibilities of Derbyshire County Council as the Administering Authority for Derbyshire Pension Fund and the performance standards which scheme employers and scheme members should expect. It is focused on the activities which involve interaction with scheme employers and / or scheme members and should not be viewed as an exhaustive list.

- **Fund policies, strategies and statements**

Published Fund policies, strategies, and statements for periodic review:

| Function / Role | Description | Performance Target |
|---|--|--|
| Pension administration strategy | Roles and responsibilities for Employers and Pension Fund. | Annual review. |
| Admission, cessations and bulk transfer policy | Employer admissions and exits, including bulk transfer policy. | Annual review. |
| Communications policy | Statements of communications policy and strategy for communication development. | Annual review. |
| Complaints policy | Policy for Fund complaints procedure. | Annual review. |
| Fund discretions policy | Pension Fund's LGPS discretions. | Annual review. |
| Funding strategy statement | Actuarial strategy, including employer funding levels and calculation of contribution rates. | Reviewed at each Fund valuation and published by 31 March following valuation date or as required. |
| Governance policy and compliance statement | Statement of Fund governance arrangements. | Annual review. |

Reporting

Statutory and non-Statutory reports prepared by Fund involving employer information:

| Function / Role | Description | Performance Target |
|---|--|---|
| Annual Report | Annual report of Fund management and performance, including annual statement of accounts. | By 1 December each year. |
| Annual scheme return to The Pensions Regulator (TPR) | Information for TPR's maintenance of register of pension schemes (including employer details). | Upon receipt of scheme return notice from TPR. |
| Actuarial valuation | Triennial valuation to review each employer's LGPS funding position and set employer contribution rates for the following 3 years. | By 31 March of the year following the actuarial valuation date. |

| | | |
|--|---|--|
| Periodic reports on pension administration and employer performance to the administering authority and Derbyshire Pension Board | Information relating to pension administration against key performance indicators and employer performance. | As required by the administering authority and Derbyshire Pension Board. |
|--|---|--|

- **Fund Communications to employers**

Summary of communications to employers:

| Function / Role | Description | Performance Target |
|--------------------------------------|---|---|
| Employer forms | Maintain and publish all forms required for completion by scheme employers. | Within 1 month of any revision. |
| Changes in scheme regulations | Notify scheme employers of changes to key scheme regulations and requirements. | Within 1 month of the change(s) coming into effect. |
| Employer meetings | Host joint meetings for scheme employers, in person or remotely. | At least 1 per year . |
| New employer training | Provide training for new scheme employers. | All new employers invited to access training on employer responsibilities within 3 months of becoming a scheme employer. |
| Further employer training | Provide an ongoing programme of refresher or subject specific training or meetings with scheme employers. | As required. |
| Employer newsletter | Provision of a newsletter / briefing note to scheme employers. | Monthly . |
| Employer non-compliance | Notify a scheme employer of issues relating to its non-compliance with performance standards. | Within 1 month of a performance issue becoming apparent. |

- **Fund Communications – Scheme Members**

Summary of Fund communications to scheme members:

| Function / Role | Description | Performance Target |
|----------------------------------|--|--|
| Member forms | Publish and keep up to date all forms required for completion by scheme members or prospective scheme members. | Within 1 month of any revision. |
| Annual Benefit Statements | Issue Annual Benefit Statements to active and deferred members as at 31 March each year (on “My Pension Online” service or by post). | By 31 August following the year-end. |
| My Pension Online | Management of registrations to the member self-service website | Within 5 working days of submission of email address and within 1 working day of final registration. |

| | | |
|--------------------------------------|---|---|
| Member information sessions | Arrange information sessions for scheme members. | At least 1 programme of sessions per year. |
| Pension Saving Statements | Issue Pension Saving Statements each year to scheme members who have exceeded their Annual Allowance. | By 6th October , subject to the scheme employer having provided all required information. |
| Changes in scheme regulations | Notify scheme members of material changes to key scheme regulations. | Within 3 months of the change(s) coming into force. |

- **Pension contributions**

Summary of valuations and employer contribution rate reviews:

| Function / Role | Description | Performance Target |
|--|---|---|
| Fund valuation Consult with employers | Consult with employers on the outcome of the periodic Fund valuation. | At least 2 months before the issue of the final Rates and Adjustments Certificate. |
| Fund valuation Employer results – Funding level and contribution rate | Issue formal valuation results to individual scheme employer following the periodic Fund Valuation. | No later than 1 month before the issue of the final Rates and Adjustments Certificate. |
| New employers Pension contribution requirements | Notify new scheme employers of their contribution requirements. | Within 2 months of joining the Fund. |

- **Scheme Employer Admissions and Cessations**

Fund role regarding new employer admissions and employer exits: This includes Admission Bodies and Academies:

| Function / Role | Description | Performance Target |
|---------------------------------------|--|---|
| New employer admissions | Process the admission of new scheme employers into the Fund including signed admission, bond and guarantor agreements where required, and obtaining the Fund actuary's contribution rate / opening funding position report. | Within 2 months of date joining the Fund subject to the new scheme employer providing all relevant information upon request. |
| Bonds for new Admission Bodies | Arrange where required for employers who outsource services/functions to undertake, to the satisfaction of the Fund, a risk assessment of the level of bond in order to protect other employers participating in the Fund. (For example, where the original employer is not a guarantor in respect of pension liabilities) | To be completed before the body is admitted to the Fund subject to the new scheme employer providing all relevant information upon request. |

| | | |
|--|--|--|
| Bond reviews for Admission Bodies | Undertake a review of bonds or indemnity required to protect other scheme employers participating in the Fund. | Annually , or 3 months prior to bond expiry as necessary. |
| Employer exits | Carry out valuation assessments on cessation of admission agreements or a scheme employer ceasing participation in the Fund. | Within 2 months of a cessation, subject to the exited employer and other related parties providing all relevant information upon request. Where a cessation valuation reports a surplus position at the point of exit, the determination and payment of the exit credit to be completed within 6 months of the exit date. |

7.2 Individual Member Administration

This section details the Administering Authority functions which specifically relate to the administration and processing of scheme member benefits from the LGPS.

- **General Enquiries**

Responding to general enquiries from scheme members:

| Function / Role | Description | Performance Target |
|--------------------------------------|---|---|
| Enquiries from scheme members | Acknowledge or respond to written or verbal enquiries from scheme employers and scheme members or their representatives or dependents and other authorised persons. | Within 10 working days from receipt of an enquiry. |

- **New Scheme Joiners and 50/50 Elections**

Actions relating to new scheme members and 50/50 elections:

| Function / Role | Description | Performance Target |
|--|--|--|
| New scheme joiner | Set up a new scheme joiner and provide the statutory notification to the member. | Within 1 month from receipt of correctly completed starter form from a scheme employer. |
| 50/50 election from scheme member | Set up a new 50/50 section membership. | Within 1 month from receipt of correctly completed notification from a scheme employer. |

- **Aggregation, Transfers and Estimates**

Administration of aggregations, transfers and estimates:

| Function / Role | Description | Performance Target |
|---|---|---|
| Aggregations of LGPS memberships | Issue statement to scheme member relating to the aggregation of previous LGPS membership. | Within 2 months of receipt of all necessary information. |

| | | |
|--|--|--|
| Transfer-in requests Commencement | Commencement of transfer-in requests. | Within 1 month of receipt of request from scheme member. |
| Transfer-in requests Completion | Completion of transfer-in applications. | Information provided within 2 months of receipt of all required information. |
| Transfer out quotations Commencement | Transfer-out quotations issued. | Within 3 months of the date of request or up to 6 months if the reason for a delay is outside the Fund's control. |
| Transfer out quotations Completion | Transfer out payments processed and notification to scheme member. | If Transfer-Out finalised within 3-month guarantee period, payment made within 1 month of guarantee date. |
| Divorce administration – Requests for CETV | Cash Equivalent Transfer Value (CETV) estimates for divorce purposes. | Within 1 month of receipt of request. |
| Estimate requests – Employees and employers | Provide requested estimates of benefits to employees / employers including any additional shortfall / strain costs in relation to the early payment of benefits. | Within 2 months of receiving all required information from the employer. Bulk requests of more than 10 estimates per month will be subject to prior agreement between the Fund and the employer. ⁴ |

- **Additional Pension Contributions (APCs)**

Notifications to employers of APC applications for the purchase of extra pension:

| Function / Role | Description | Performance Target |
|---|---|--|
| Additional Pension Contributions – Notification to employers | Notify the scheme employer of any scheme member's election to purchase additional pension contributions, including all required information to enable deductions to commence. | Within 2 weeks of receipt of election from scheme member to meet the employer's next available payroll. |

- **Deferred Benefits / Refunds**

Administration of deferred members and refunds:

| Function / Role | Description | Performance Target |
|--|--|---|
| Deferred members | Deferred benefits options letter to members. | Within 2 months of the leaving date subject to the receipt of all necessary information. |
| Refunds of member contributions | Determine eligibility and process refund payments. | Within 2 months from receipt of all necessary information. |

⁴ Members are limited to one written estimate for a prospective retirement date within two years of the request, in any 12-month period

- **Retirements / Deaths**

Administration of retirements and deaths:

| Function / Role | Description | Performance Target |
|---|---|--|
| Retirement options to members who have ended active membership aged 55 or over | Provision of retirement options letters detailing member options. | Within 2 weeks from receipt of all necessary information. |
| Administration of retirement applications | Process of retirement benefits, including deferred benefits, for payment following receipt of a request to access benefits. | Within 1 month of retirement date or from the receipt of all necessary information with the first pension payment made on next available payroll run. |
| Death notification acknowledgement | Notification of death. | Acknowledge within 1 week of initial notification. |
| Administration of death benefits (Death grant) | Process of death grant for payment. | Within 2 weeks of receipt of all necessary documentation. |
| Administration of death benefits (Survivor's pension) | Processing of beneficiaries' pensions for payment. | Within 2 weeks of receipt of all necessary documentation. |
| Pensioner members – Issuing of payslips | Provide payslips to scheme members in receipt of a pension. | In March, April and May of each year and where the monthly pension amount changes by at least 1%. |

- **Appeals**

Administration of AADP Stage 2 appeals:

| Function / Role | Description | Performance Target |
|---|---|---|
| AADP Stage 2 appeal - Acknowledgement | Acknowledge receipt of AADP Stage 2 appeal. | Within 1 week of receipt of AADP Stage 2 appeal. |
| AADP Stage 2 appeal - Arrange adjudication | Decide adjudicator for completion of the AADP Stage 2 determination | Within 1 week of receipt of AADP Stage 2 appeal |
| AADP Stage 2 appeal - Preparation of information and evidence for chosen adjudicator | Prepare information and evidence as required for adjudicator to consider AADP Stage 2 appeal. | Within 2 months of receipt of the application, or such longer time as is required to process the application where further information or clarification is required. |
| AADP Stage 2 appeal - Notification of decision | Ensure the issue of a formal letter to the appellant following the adjudicator's determination of the AADP Stage 2 Application. | Within 1 week of the adjudicator's decision. |

8. Performance monitoring

The Fund and scheme employers must aim to ensure that all functions and tasks are carried out to the agreed standards set out in this strategy.

The Fund will monitor, measure and report on the Fund's and scheme employers' compliance with the agreed service standards outlined in this document on a regular basis to the Pension Board and Pensions and Investments Committee.

Where employers fail to meet required standards and attempts by the Fund to engage with the employer on improving standards are unsuccessful, the Fund will determine if the matter is reported to The Pensions Regulator.

The partnership between the Fund and scheme employers is important for the successful, ongoing administration of the scheme. The Fund has a duty to support employers in meeting their responsibilities and will work closely with employers which are struggling to meet their LGPS responsibilities, including the provision of appropriate training.

Regulation 70 of The Local Government Pension Scheme Regulations 2013 provides pension funds with the ability to recover any additional administrative costs that have been incurred, because of a scheme employer's underperformance.

Where an employer's continuing underperformance in meeting their responsibilities under this Strategy and LGPS regulations requires the Fund to assign additional time, resource, and incur the associated costs, the Fund will seek to recover the related costs from the employer directly.

This avoids other participating employers from being required to contribute towards the additional costs caused by the underperforming employer.

Employer self-assessment

Employers should monitor their own performance against the duties and responsibilities for participating employers and seek to improve performance where it is not achieving the required level of performance.

If employers have concerns about the data they provide, they should contact the Fund without delay. This will allow the Fund to help to resolve any issues and enable both parties to meet their requirements for the benefit of scheme members.

Fund monitoring of employer performance

The Fund will also monitor the employer's performance against the agreed performance levels and will work closely with employers in identifying any areas of poor performance, provide the opportunity for necessary training and development and put in place appropriate processes to improve the level of employer performance in the future.

Steps taken on identification of employer underperformance

Where the Fund identifies an employer regularly failing to meet deadlines and performance standards (for example data quality) or failure to engage with the Fund to resolve the identified issues, the Fund will commence the following steps:

1. The Fund will contact the employer to set out the area(s) of poor performance and requirements for improvement.

2. The Fund will agree an improvement plan with the employer setting out the outcomes required and a timescale for achieving and maintaining the improvements. The requirement to agree an improvement plan with an employer will be added to the Fund's log of statutory breaches of legislation.
3. Where the employer fails to engage with the setting of an improvement plan or fails to demonstrate steps taken as part of an agreed plan, the Fund will issue a formal written notice to the employer. The formal written notice will:
 - a. include the issues identified requiring improvement, and where applicable, the steps taken towards improved performance
 - b. give notice that the Fund will begin to seek recovery of additional administration costs
4. Within one month of the formal notice being issued, the Fund will clearly set out calculations of additional costs incurred from the initial notification of poor performance to the employer, taking account of time and resources in resolving the specific area of poor performance; and issue an invoice to the employer in accordance with the charging scales set out in this document.
5. In the event that the employer continues to fail to engage with the improvement plan, the Fund will issue further invoices to recover the costs of additional administration.
6. The Fund's management team will review the employer's engagement with the improvement plan and statutory breaches of legislation. Where unsuccessful, the Fund will determine if the matter is to be reported to The Pensions Regulator.

The Fund monitors its own performance against internal key performance indicators (KPIs). Monitoring is carried out on a monthly basis and is reported to the Pensions and Investments Committee (the Committee) and Derbyshire Pension Board (the Board) periodically. The performance of scheme employers against the standards set out in this document, including data accuracy, are also reported to the Committee and Board.

The Fund will report back to employers where required about their individual performance, identifying any areas for improvement including outstanding data items.

Where an employer declines to work with the Fund to resolve problems and consistently fails to meet its responsibilities under the LGPS Regulations, in addition to charging the employer for additional administration costs, the Fund (or stakeholders such as the Pension Board) has a duty to report such breaches to The Pensions Regulator, who has the regulatory power to take enforcement action and, if necessary, apply further financial penalties.

Additional administration charges

Summary of the Fund's determination of additional administration charges:

| Reason for charge or fine | Level of charge (£) |
|--|---|
| Late payment of Employer and / or Scheme Member contributions. | £150 per occurrence plus interest as defined in Regulation 71 of LGPS Regulations 2013. |
| Non-engagement of employer with i-Connect by end of scheme year. | Costs relating to the preparation and administration of non i-Connect documentation; £1,500 per employer reference code Costs per active member; £250 per active member |

| | |
|--|---|
| Late submission of monthly i-Connect data transmission. | £150 per occurrence. |
| Where an employer has not implemented i-Connect, the late provision of fully completed and accurate year end returns in the required format. | £1,000 per occurrence plus £100 for each week plus part week of continued non-provision. |
| Late provision of starter information, per case. | £100 initial charge plus £50 per month or part month of continued non-provision. |
| Late provision of leaver information, per case. | £100 initial charge plus £50 per month or part month of continued non-provision. |
| Charges for persistent incorrect and incomplete information provided by the Employer to the Fund (where the case has to be returned for incorrect information on more than 2 occasions). | £100 per case. |
| Fine from The Pensions Regulator. | Amount requested by The Pensions Regulator. |
| Fine from The Pensions Ombudsman. | Amount requested by The Pensions Ombudsman. |
| Delay causing unauthorised payments. | Cost of tax from HMRC and or reimbursement of charges imposed by HMRC on Derbyshire Pension Fund. |
| Fines from any other statutory body incurred due to the employer's actions. | As levied. |

If poor performance continues and impacts the Fund's ability to perform statutory functions and / or measures are not being taken by the employer to address this, the Fund will report the employer to The Pension Regulator.

Where it is necessary to ensure that members' benefits are not delayed unduly due to employers' underperformance in providing the required information, the Fund reserves the right to calculate and pay benefits based on the best information available. The basis of the calculation will be explained to the member and employer in each case, and further to completing the additional administration charges process. The costs caused by the need for a subsequent revision of benefits will be charged to the employer.

Underperformance charges will apply at the discretion of the Head of Derbyshire Pension Fund and will be calculated based on a combination of the standard tariff of charges plus time spent at the daily rate.

Charges for 'time spent' on underperformance issues will be made on a minimum half day or full day basis. For more than half a day, the full day charge will be made.

“Time spent” – Officer charges

Summary of officer charges for time spent on cases triggered by employer underperformance

| Time taken | Charge levels | | |
|--------------------|--|--|--|
| | Level 1 (Work at Senior Pensions Assistant Level) | Level 2 (Work at Pension Officer Level) | Level 3 (Work at Pension Administration Manager / Head of Pension Fund Level) |
| Daily ⁵ | £113 | £156 | £221 |
| Half day | £56 | £78 | £111 |

⁵ Based on hourly rates from Derbyshire County Council's Salary Scales 2023/2024. Level 1 (Salary point 15), Level 2 (Salary point 27) and Level 3 (Salary point 39)

Where an employer fails to pay any amount due to the Fund (other than monthly contributions) within 30 days, interest for late payment will be charged accordingly. This includes charges and recharges levied in respect of cost recovery.

Feedback from employers

Employers who wish to provide feedback on the performance of the Fund against the standards in this administration strategy should send their comments by email to the Fund's Regulations and Communications team: pensions.regs@derbyshire.gov.uk

Any feedback received will be incorporated into reports provided to the Pensions and Investments Committee and the Pension Board.

9. Audit

The Fund is subject to regular audits of its processes and internal controls. The Fund and its scheme employers are expected to fully comply with any requests for information from both internal and appointed external auditors. Any subsequent recommendations made will be considered by the Fund and where appropriate, implemented accordingly.

10. General Data Protection Regulations (GDPR)

In May 2018, the EU's General Data Protection Regulation (GDPR) came into force. The regulation changed the way organisations process and handle data, with the aim of giving greater protection and rights to individuals.

GDPR applies to the processing of personal data that is:

- wholly or partly by automated means, or
- the processing other than by automated means of personal data which forms part of, or is intended to form part of a filing system

The UK's Data Protection Act 2018 is the UK's implementation of GDPR and controls how personal information is used by organisations, businesses, and the government. Under the Data Protection Act 2018, everyone responsible for using personal data must follow strict data protection principles. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

Employers necessarily supply the Fund with personal data relating to their employees.

Personal data collected / held by the Fund includes:

- contact details: name, address, telephone number and email address
- identifying details: date of birth, national insurance number and employee number and folder reference

- assessment information: used to calculate and assess eligibility for benefits, for example length of service or membership and salary information
- financial information: relevant to the calculation or payment of benefits, for example bank account and tax details
- family information: dependents or personal circumstances, for example marital status and information relevant to the distribution and allocation of benefits payable on death
- health information: to assess eligibility for benefits payable on ill health
- criminal convictions: if this has resulted in a member owing money to their employer or the Fund and the employer or Fund may be reimbursed from the member's benefits

Employers are under a statutory obligation, as detailed in Regulation 80 of the LGPS Regulations 2013, to provide certain personal data relating to their members to their pension administrators, including (but not exhaustively): the Pay Reference Number, Post Number, National Insurance Number, Surname, Forenames (or Initials), Title, Gender, Date of Birth, Address, Postcode, Date Pensionable Service Started, Marital Status, Hours, Weeks, Pay, Basic Employee and Employer Contributions Paid, Additional Employee and Employer Contributions Paid, Date Left Pensionable Service, Reason Left Pensionable Service and Periods of Absence from Pensionable Service.

The Fund uses members' personal data to:

- contact members
- assess eligibility for pension benefits, to calculate benefits and to provide members (and their beneficiaries upon their death) with benefits
- identify members' potential or actual benefit options
- allow alternative ways of delivering benefits (for example under a power of attorney)
- carry out statistical and financial modelling and for reference purposes (For example when the Fund assesses how much money is needed to provide members' benefits)
- comply with the Fund's legal and regulatory obligations
- address queries from members and other beneficiaries and to respond to any actual or potential disputes concerning the Fund
- manage the liabilities of the Fund
- to support the sale, merger or corporate reorganisation or transfer of a business by employers that participate in the Fund

Employers must ensure that the personal data supplied to the Fund is correct. The supply of incorrect data (in particular, incorrect contact details) can lead to a data breach.

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. Breaches of personal data can expose the Fund / Administering Authority to substantial fines from the Information Commissioner's Office (ICO) www.ico.org.uk, financial claims from individuals whose personal information has been inappropriately disclosed, and to severe reputational damage.

Privacy Notice

The Fund has published a full privacy notice in line with GDPR requirements, setting out why certain data is held, the reason for processing the data, who it shares the data with and how long the data will be retained. Within the notice, members are also provided with additional information about their rights under the legislation. The privacy notice is available from the Fund's website: derbyshirepensionfund.org.uk/privacy

Memorandum of Understanding

The Fund has issued a Memorandum of Understanding to its employers, which confirms the joint roles and responsibilities with regards to the sharing of information which enables it to provide an efficient and effective service to scheme members and stakeholders. The Memorandum of Understanding is available from the Fund's website: derbyshirepensionfund.org.uk/GDPR

Employers should inform all new employees that their personal data is shared with the Fund, in accordance with the statutory responsibilities of administering the LGPS.