

**Appendix C: Pension Administration Strategy 2018  
Outcomes of the Employer Consultation – June 2018**

<u>Meeting:</u>	<u>Attendee (employer):</u>
Employer Peer Group – 5 <sup>th</sup> June 2018	Bishop Cleary Catholic MAT Coventry CC Halesowen College Matrix Academy Trust Sandwell MBC Solihull College University of Wolverhampton Wolverhampton CC
Larger Employer Group - 6 <sup>th</sup> June 2018	Birmingham CC Birmingham City University Coventry University Dudley MBC Solihull MBC West Midlands Police Wolverhampton CC Wolverhampton University

	<b>Employer Comment</b>	Fund Response
<b>1.</b>	<b>Introduction and Regulatory Context</b>	
	No comments	
<b>2.</b>	<b>Aims</b>	
	No comments	
<b>3.</b>	<b>Roles and Responsibilities</b>	
4.2	Arrears payments (predominately relating casual workers) tend to be paid one month after the leave/retirement date, therefore expectations cannot be met. Employers we reluctant to submit leaver documentation prior to the payment date due to the revised forms which would need to be completed subsequently.	<b>ACTION/COMMENT:</b> No change proposed – In cases where arrears occur it is acknowledged there may be a consequential delay, however the timescales set are to enable statutory disclosure timescales to be met factoring in standard processing requirements.
4.3	Payroll teams are not always notified when a member leaves employment within 30 days of the month end date of leaving.	<b>ACTION/COMMENT:</b> No change proposed – Understand/acknowledge administrative issue for employers, but standards set are based on required processing time for the Fund with the member focus in line with disclosure requirements.

<b>3.1.2</b>	<b>Performance Measurements</b>	
	The performance measure deadlines seem difficult to meet?	These deadlines are aligned to The Pensions Act disclosure regulations with a member focus and allowing for required processing timescales for the Fund
2.6	Is there a timescale for when the Fund are required to respond to employer enquiries	The Fund has in place key performance indicators which set the standards the Fund expects to adhere to. Performance against these KPI's are reported to and reviewed by Senior Management on a monthly basis and to Pension Committee on a quarterly basis.
<b>3.2.1</b>	<b>West Midlands Pension Fund – Duties and Responsibilities</b>	
3.2.1 3.1	Can additional information be provided alongside monthly submission error feedback.	The Fund aims to provide regular feedback to participating employers on their performance, particularly that relating to monthly data submissions. The intention is to summarise this performance using a high-level dashboard and to issue associated guidance and notes on error messages to facilitate employers with self-monitoring progress.
<b>4.</b>	<b>Monitoring Performance</b>	
	Is Fund performance measured, and if so, can this information be shared with scheme employers?	The performance standards set out in the PAS confirm the processing requirements and expected standards from the Fund. Details of the Fund performance is shared at the Mid-Year Review/Annual General Meeting and via the Employer Peer Group and Employer Briefing Note.
<b>4.4</b>	<b>Charging Scales for Administration</b>	
	How has the charging structure been developed?	The charging structure aims to deliver proportional approach and reflecting the diversity within the employer base, with the aim of encouraging good performance. For charges based on timeliness, the provision of information this reflects the size of the active membership; for charges around quality of information this reflects the amount of rectification work required by the Fund.
	Is the same charging structure applicable to all employers?	Yes, the Fund reviews each employer's membership profile, before levying charges.
	Will the charges be based on individual monthly submission files?	Charges will be based on a cumulative average over a 12-month period. The swift rectification of errors will be taken into consideration prior to the Fund levying charges.
	Will employers be charged for errors that they are unaware of i.e. They haven't received an error report file for?	When levying charges, the Fund will factor in the timescales involved in the Fund issuing error reports to employers for action. The Fund will review and consider any employer appeals on a case-by-case basis.
	Will employers get charged for errors which have been rectified on the monthly	Employers will be charged for errors above the tolerance level set out in the PAS, that require rectification by the Fund.

	submission error report (highlighted in green)?	
	Can payroll providers be notified of the charges levied in advance of the employer notification, to ensure that a good reputation/rapport is maintained?	As far as possible, the Fund will initially notify payroll providers, where known, of any charges becoming due by the employer due to payroll performance, to allow the provider to liaise with the employer.
	How many charges were issued last year?	Approximately 260 issued,
	Why is the payment of future service contributions due to paid in full by 19th of the following month but submission of the member data file/web remittance advice due by 22nd of the following month?	<b>CHANGE TO BE IMPLEMENTED:</b> Timescales will be adjusted in PAS to reflect the requirement of payment of contributions and receipt of remittance advice by 19 <sup>th</sup> of month following the month due.
	Will employers still be charged for late submission of the data file if there is a delay with the Fund answering queries.	Data files are due monthly, and performance will be assessed based on monthly delivery, but averaged out over to the course of the year, with any charges applied annually. There is an expectation that once all employers are onboarded and up to date (allowing for lag in delivery during 17/18 onboarding) the Fund expects feedback on submissions to be provided within 20 working days, as per PAS. In line with the charging structure within the PAS, there is an employer appeal process.