



Pensions Administration Strategy 2018

June 2018

Pensions Administration Strategy 2018

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1) Introduction and Regulatory Context

This is the pension administration strategy of West Midlands Pension Fund (the Fund) in relation to the Local Government Pension Scheme (LGPS), which is administered by the City of Wolverhampton Council (the administering authority).

The pension administration strategy is kept under review and revised to reflect changes to LGPS regulations and Fund policies. This document sets out a framework by way of outlining the policies and performance standards to be achieved by the Fund and employers to enable provision of a cost-effective and high quality pension administration service.

The LGPS is a statutory scheme and governed by regulations. The current regulations appertaining to administration are the LGPS Regulations 2013 (As Amended). In discharging their roles and responsibilities under these regulations, the Fund and employers are also required to comply with any pertinent overriding legislation and take appropriate recognition of any regulatory guidance or Code of Practice issued by The Pension Regulator.

An efficient and effective scheme administration service requires the following:

- Clear point of contact, roles and responsibility
- Timely exchange of information and payment of contributions
- Complete and accurate notifications and communications
- Early notification of material changes
- Clear and timely responses to requests and queries

This strategy outlines the performance expected and the monitoring in place to support service delivery

2) Aims

In line with the Fund's objectives, the aim of the PAS is to partner with our employers to provide a high quality service to our members delivered through efficient working practices.

We do that through detailing the expected performance of the Fund and its employers in meeting both the legal and regulatory duty of scheme administration as set out in the Pension Regulator's Code of Practice.

The efficient delivery of the benefits of the scheme is reliant upon effective administrative procedures being in place between the Fund and scheme employers, most notably the timely exchange of accurate information in relation to scheme members.

The primary method of exchange is via the employer web portal providing a secure link which can be tracked for audit purposes.

This administration strategy sets out the expected levels of performance of the Fund and the scheme employers. The strategy provides details about the monitoring of performance levels and the action(s) that could be taken where standards are not met by employers and/or when persistent non-compliance occurs.

The administration strategy, of which this iteration is effective from June 2018, was introduced in April 2015, with revisions since that date captured in this document. The Fund will continue to keep the strategy and policy document under review and update as required to reflect changes in scheme regulations and Fund working practices.

3) Roles and Responsibilities

Overriding legislation dictates minimum standards that pension schemes should meet in providing certain pieces of information to the various parties associated with the LGPS. In addition, regulatory guidance sets out a number of requirements for the Fund and scheme employers to provide information to each other, scheme members and prospective scheme members, dependants, other pension arrangements or other regulatory bodies.

| Function/Task | | Expectation |
|---------------|--|---|
| 1) | General information | |
| 1.1 | Confirm nominated representative(s) to receive information from the Fund via the submission of a completed contact form via employer web portal | By 30 April each year (to be submitted via employer web portal) |
| 1.2 | Appoint a person (the adjudicator) to consider disputes under stage 1 of the pension internal dispute process (IDRP) and provide full up to date contact details to the Fund | Notify Employer Services at the Fund within 30 days of becoming a scheme employer or following the resignation of the current adjudicator |
| 1.3 | Formulate, publish and keep under review policies in relation to all areas where the employer may exercise a discretion within the LGPS ¹ | A copy of the policy document is to be submitted to the Employer Services team at the Fund within one month of the change in policy |
| 1.4 | Distribute any information provided by the Fund to scheme members/potential scheme members (eg, scheme benefits or benefit statement production) | In a timely manner, as required |
| 1.5 | Notify the Fund in advance of any employer initiatives, policy decisions or practices which could have an impact on LGPS member benefits | As soon as possible once the decision has been made or initiative/practice has been finalised as a minimum Where possible, earlier contact is preferable to enable the Fund to discuss and understand the implications |

| Function/Task | | Expectation |
|---------------|--|---|
| 2) | Contributions | |
| 2.1 | Remit employer and employee contributions to the Fund | By 19th of the following month |
| 2.2 | Implement changes to employer contribution rates as instructed by the Fund at the date specified by the Fund's actuary | In line with the Rates Adjustment Certificate issued by the Actuary following each triennial valuation or on commencement as a scheme employer within the Fund as notified in writing |
| 2.3 | Ensure and arrange for the correct deduction of employee contributions from a member's pensionable pay and throughout their membership in the scheme (including any periods of leave) | As required, typically monthly |
| 2.4 | Manage the deduction of all additional contributions or amend such deductions, as appropriate | As required |
| 2.5 | Arrange for the deduction of AVCs and payment over of contributions to the AVC provider(s) and inform the Fund as required | As required, typically monthly |
| 2.6 | Make additional fund payments in relation to early payment of benefits from flexible retirement, redundancy or business efficiency retirement or where a member retires early with employer's consent and a funding strain cost arises | Within 30 days of receipt of invoice from the Fund |

¹For further information on which regulations require a policy, please see Regulation 60 in The Local Government Regulations 2013 (www.lgpsregs.org)

| Function/Task | | Expectation |
|---------------|--|--|
| 3) | Contracting out of services | |
| 3.1 | Notify the Fund of the contracting out of services which will involve a TUPE transfer of staff to another organisation so that information can be provided to assist in the decision | Where possible, three months prior but at latest the point of deciding to tender |
| 3.2 | Work with the Fund to arrange for an admission agreement to be put in place when contracting out a service, and assist in ensuring it is complied with | Three months in advance of the date of contract |
| 3.3 | Notify the Fund if the employer ceases to admit new scheme members or is considering terminating membership of the Fund | As soon as the decision is made (early discussion with the Fund is encouraged) |

| Function/Task | | Expectation |
|---------------|--|--|
| 4) | General administration and change notifications in relation to active members | |
| 4.1 | Provide the Fund with the following member information on one monthly file (via employer web portal): <ul style="list-style-type: none"> • new joiners • changes in employees' circumstances which may impact Fund benefits (eg, movement in and out of the 50/50 scheme, marital or civil partnership status, maternity, paternity, career break, etc.) • employee and employer contributions and earnings | On a monthly basis, by the 19th of the following month, as part of the monthly submission upload via the employer web portal |
| 4.2 | Notify the Fund (via employer web portal) when a member is due to retire including an accurate assessment of final pay details and authorisation of the reason for retirement | <ul style="list-style-type: none"> • Notify the Fund when a member is due to retire: <ul style="list-style-type: none"> - up to one month following the date of retirement if the date of retirement is before normal pension age (NPA) or; - ASAP once final earnings are known, typically three weeks before and no later than one week after the date of leaving, if the member's benefits are payable on or after their normal pension age (NPA)¹ S4 retirement/death in service form (S4RB) to be submitted via employer web portal ² |
| 4.3 | Notify the Fund (via employer web portal) when a member leaves employment including an accurate assessment of final pay details | <p>Within 30 days of month end of date of leaving</p> <p>S4 early leaver form (S4EL/OPT) to be submitted via employer web portal²</p> |
| 4.4 | Notify the Fund (via employer web portal) of the death of a scheme member | <p>As soon as practicable, but within a maximum of ten days of the employer being notified</p> <p>S4 retirement/death in service form (S4RB) to be submitted via employer web portal²</p> |

¹Notification should not be given prior to the final earnings being known to avoid recalculation of member benefits

²On receipt of the appropriate S4 notification, where data is incomplete or inaccurate this may lead to delays in processing by the Fund should queries need to be raised

3.1.2 Performance Measurements

The table below sets out the areas that employer performance will be routinely measured. The Fund will periodically review other employer responsibilities to ensure performance is in line with the expectations detailed in this strategy.

| Performance Area | | Measurement (working days where applicable) |
|------------------|---|--|
| 1) | Contributions | |
| 1.1 | Remit employer and employee contributions to the Fund | <p>Payment of monthly employee and employer contributions in full by the 19th of the following month.</p> <p>Under the Pensions Act 2004 and the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014, The Pensions Regulator may be notified if the above measurement is not met.</p> |

| Performance Area | | Measurement (working days where applicable) |
|------------------|---|---|
| 2) | General administration and change notifications in relation to active members | |
| 2.1 | <p>Submission of a monthly data file and web remittance advice via employer web portal which includes the following in month data:</p> <ul style="list-style-type: none"> • new joiners • changes in employees' circumstances which may impact Fund benefits (eg, movement in and out of the 50/50 scheme, marital or civil partnership status, maternity, paternity, career break, etc.) • employee and employer contributions and earnings paid within that period | By the 19th of the following month |
| 2.2 | To ensure optimum accuracy of monthly data files received. | Less than 5% of the active member count as at 1 April to error on import into the pension administration system |
| 2.3 | The rectification of an accurate monthly data file where it has been necessary to return the file due to data inaccuracies | Within 20 days of receipt of file. |
| 2.4 | Notify the Fund when a member is due to retire including an accurate assessment of final pay details and authorisation of the reason for retirement | <ul style="list-style-type: none"> • Notify the Fund when a member is due to retire: <ul style="list-style-type: none"> - up to one month following the date of retirement if the date of retirement is before normal pension age (NPA) or; - ASAP once final earnings are known, typically three weeks before and no later than one week after the date of leaving, if the member's benefits are payable on or after their normal pension age (NPA) <p>S4 form to be submitted via employer web portal</p> |
| 2.5 | Notify the Fund when a member leaves employment including an accurate assessment of final pay details using the method stipulated by the Fund | <p>Within 30 days of month end of date of leaving</p> <p>S4 form to be submitted via employer web portal</p> |
| 2.6 | Respond to enquiries from the Fund in regards to member notifications and submitted forms (ie, S15, N15 etc) | Within ten days from receipt of enquiry |

In line with The Pension Regulator's Code of Practice, the Fund in conjunction with its employers has implemented a two-stage process for dealing with pension disputes when a member is unhappy with the first instance decision.

The table below details the expected timeframe for managing this internal dispute resolution process. Further details can be found in the Fund's *Internal Dispute Resolution Procedure*.

| Performance Area | | Measurement (working days where applicable) |
|------------------|--|---|
| 3) | IDRP | |
| 3.1 | Notify the Fund's compliance team of the receipt of a complaint under the IDRP process | Within two days of receiving the complaint |
| 3.2 | Notify the Fund's compliance team that the first-stage decision has been issued | Within five days of issuing the decision |
| 3.3 | Timeframe for resolution of IDRP | Two months |
| | Notifying if timeframe is not going to be met | Immediately when known not going to meet original timeframe |
| 3.4 | Responding to Fund enquiries when Fund dealing with Stage 2 | Within five days |

3.2 West Midlands Pension Fund

3.2.1 Duties and Responsibilities

In setting the expectation of employers, the Fund recognises that the relationship and delivery of services, is also reliant on the Fund's performance and duties to its employers.

The table below outlines the key responsibilities of the Fund, what actions it will take and the timescales of its own performance in delivering the service to members and employers. It is focused on the key activities which scheme employers and scheme members are involved in and should not be viewed as an exhaustive list.

| Function/Task | | Expectation |
|---------------|---|---|
| 1) | General information | |
| 1.1 | Regularly review the Fund's pensions administration strategy and consult with all scheme employers | In advance of the policy being adopted. Consultation will take place during the year of the triennial valuation |
| 1.2 | Regularly review the Fund's funding strategy statement at each triennial valuation, following consultation with scheme employers and the Fund's actuary | Publish by 31 March following the valuation date or as required |
| 1.3 | Regularly review the Fund's communication policy statement | Annual review and publish within 30 days of the policy being agreed by the Pensions Committee |
| 1.4 | Regularly review the Fund's termination policy statement and publish | Within 30 days of any changes being made to the policy |
| 1.5 | Review and communicate the Fund's publications listed below: <ul style="list-style-type: none"> • Annual Report • Annual Statement of Accounts • Governance and Compliance Statement | By 31 October following the year-end |

| Function/Task | | Expectation |
|---------------|---|---|
| 2) | Contribution requirements | |
| 2.1 | Consult with employers on the outcomes of the triennial valuation | At least three months in advance of the signing of the final rates and adjustment certificate |
| 2.2 | Notify employers of contribution requirements for three years effective from the April following the actuarial valuation date | At least six weeks before the Actuary signs off the rates and adjustment certificate |
| 2.3 | Notify new scheme employers of their contribution requirements | Within six weeks of receipt of the notification of admission application or commencement as a scheme employer |

| Function/Task | | Expectation |
|---------------|---|--|
| 3) | Support for employers | |
| 3.1 | Provide support for employers through: <ul style="list-style-type: none"> • A dedicated helpline • Employer coaching • Employer Peer Group • Employer newsletters • Online support guides • Feedback on data quality • Face-to-face meetings (one-to-one where appropriate) • Employer web portal query support • Email support • Member Services presentations and roadshows | <ul style="list-style-type: none"> • Dedicated helpline Monday - Thursday 8.30am - 5.00pm, Friday 8.30am - 4.30pm • Employer Forums to be held twice per annum (usually May/June and November/December) • Written communication as per the Fund's communication policy • Newsletters to be issued quarterly • Online support to be reviewed and updated regularly • Employer coaching and peer group content to be reviewed before each session for relevance and benefit. Sessions to be held quarterly for each. |
| 3.2 | Organise and provide coaching sessions on the roles and responsibilities of an employer in the Fund | Quarterly and upon request or as required for scheme employers |
| 3.3 | Notify scheme employers and scheme members of changes to the scheme rules | As per disclosure requirements with inclusion of an overview in the <i>Employer Brief</i> |
| 3.4 | Provide a facility (via employer web portal) for employers to calculate estimates and early retirement costs for active members | On an ongoing basis |
| 3.5 | Production and maintenance of an IDRPs employer guide | On an ongoing basis |

| Function/Task | | Expectation |
|---------------|--|---|
| 4) | General administration and member communications | |
| 4.1 | Produce annual benefit statements for active members as at 31 March and deferred members as at pensions increase date in April | By 31 August following the year-end |
| 4.2 | Produce and issue pension savings statements each year to members who have exceeded their annual allowance | By the end of the tax year, 6 October (provided receipt of all relevant information from the scheme employer) |
| 4.3 | Publish and keep up to date all forms required for completion by scheme members or employers | Within 30 days from any revision |
| 4.4 | Provide feedback on errors contained in monthly data submission files | Within 20 working days of the later of the 19th of each month or the date the file is received by the Fund |

3.2.2 Performance Measurements

The Fund routinely reviews performance across all areas including the Pension Administration Strategy, which is scrutinised by the Pensions Committee and Local Pensions Board. Regular reporting is undertaken, and performance is also reported annually in the Fund's annual report and accounts. The table below sets out the Fund's key performance indicators in relation to processing scheme member records and benefits.

| Performance Area | | Measurement (working days where applicable) |
|------------------|--|---|
| 1) | New joiners | |
| 1.1 | Set up a new starter and provide statutory notification to the member | Within 20 days of receipt of correct data file from a scheme employer |
| 2) | Transfers | |
| 2.1 | Transfer in quotations processed | Within ten days of receipt of all the required information |
| 2.2 | Transfer notification of transferred in membership to be notified to the scheme member | Within ten days of receipt of payment |
| 2.3 | Transfer out quotations processed | Within 20 days |
| 2.4 | Transfer out payments processed | Within ten days |

| Performance Area | | Measurement (working days where applicable) |
|------------------|--|---|
| 3) | Additional contributions | |
| 3.1 | Notify the scheme employer of any scheme member's election to pay additional pension contributions (APCs), including all required information to enable deductions to commence | Within ten days of receipt of election from a scheme member |
| 3.2 | Process scheme member requests to pay/amend/cease additional voluntary contributions (AVCs) | Within five days of receipt of request from scheme member |

| Performance Area | | Measurement (working days where applicable) |
|------------------|---|--|
| 4) | Leavers | |
| 4.1 | Notify members of their deferred options | Within ten days of receipt of the leaver notification |
| 4.2 | Deferred benefits calculated | Within 15 days of receipt of all necessary information |
| 4.3 | Deferred benefits processed for payment following receipt of election (and all necessary information) | Within five days |
| 4.4 | Refund payments | Within five days from receipt of all necessary information |

| Performance Area | | Measurement (working days where applicable) |
|------------------|---|--|
| 5) | Retirements | |
| 5.1 | Provision of retirement options to members | Within 15 days of receipt of all necessary information |
| 5.2 | New retirement benefits processed for payment following receipt of election | Lump-sum payment within five days of receipt of all necessary documentation First pension payment on next available payroll run |

| Performance Area | | Measurement (working days where applicable) |
|------------------|---|--|
| 6) | Deaths | |
| 6.1 | Acknowledgement of a death | Within five days of receiving the notification. |
| 6.2 | Notification of benefits payable to dependents will be issued | Within five days of receiving the required information |
| 6.3 | Payment of death lump-sum will be made information | Within ten days of receipt of all the required |

| Performance Area | | Measurement (working days where applicable) |
|------------------|--|--|
| 7) | Customer service | |
| 7.1 | 85% of calls received to the customer helpline to be answered | 85% |
| 7.2 | 85% of calls received to the employer helpline to be answered | 85% |
| 7.3 | Provide an answer or acknowledgement to scheme members/scheme employers/personal representatives/dependents and other authorised persons | Within ten days from receipt of enquiry |
| 7.4 | Acknowledge member complaints on initial receipt | Within five days of receipt |
| 7.5 | Issue full response to member complaints | Within 20 days of receipt |
| 7.6 | Monitor IDRPs cases and target completion of stage 1 and stage 2 reviews | Within two months. For further information, please see the Fund's IDRPs policy |

4) Monitoring Performance

4.1 Working with our Employers

The Fund recognises that engagement is key to helping us understand our employers' individual circumstances, their challenges and their outcomes. Engaging with employers helps to build positive working relationships and ensures processes create efficiencies and deliver outcomes on both parts. The consistent application of standards across all employers enables fair and value for money service

The Fund will seek to work closely with employers when identifying areas of poor performance. At the earliest opportunity, the Fund will provide training and development to aid improvement of service levels in the future. Where performance issues are identified, in the first instance, the Fund will work to resolve the issues informally. However, where this is not possible and persistent sub-standards occur (with no measurable improvement demonstrated by the employer), additional steps may be taken by the Fund in line with its powers under the LGPS Regulations 2013.

The Fund aims to meet the training and development needs of its employers using (but not limited to) employer coaching, quarterly bulletins, website guidance and through day-to-day contact via email and telephone. There is also an open invite to visit the Fund's office to meet with a member of the Employer Services team, subject to notice, to discuss any aspect of co-operation, expectations and responsibilities.

4.2 Approach to Managing Performance

Ensuring compliance with the LGPS regulations and this administration strategy is the responsibility of the Fund and scheme employers. This section describes the ways in which performance and compliance will be monitored.

The Fund and scheme employers are to ensure that all functions and tasks are carried out to the agreed quality standards. On a regular basis, the Fund will monitor, measure and report on both the Fund's and scheme employers' compliance with the agreed service standards outlined in this document.

The Fund will undertake a formal review of performance against the administration strategy on an annual basis and liaise with employers in relation to any concerns on performance. The Fund monitors its own performance against internal key performance indicators. Monitoring occurs on a monthly basis and is reported to the Fund's Pensions Committee on a quarterly basis. The performance of scheme employers against the standards set out in this document are incorporated into the reporting to the Committee, as appropriate, to include data quality. The Fund will also report back to employers about their individual performance, identifying any areas for improvement including outstanding data items.

Where persistent and ongoing failure occurs in relation to administration requirements and no improvement is demonstrated by an employer, and/or willingness is shown by the employer to resolve the identified issue(s). The following sets out the steps that will be taken in dealing with this situation:

- Write to the scheme employer, setting out area(s) of non-compliance with performance standards and offer support and, where applicable, request attendance at a training/coaching session.

- Where no improvement has been demonstrated by the employer, or where there has been a failure to take agreed action by the scheme employer, or no response is received to the initial letter, the scheme employer will be asked to attend a conference call/meeting with representatives of the Fund to discuss area(s) of non-compliance with performance standards and to agree an action plan to address them. Where appropriate, the originating employer will be informed and expected to work with the Fund to resolve the issues.
- If no improvement is seen within one month or a scheme employer is unwilling to attend a meeting to resolve the issue, the Fund will issue a formal written notice, setting out:
 - the area(s) of non-compliance with performance standards that have been identified;
 - the steps taken to resolve those area(s); and
 - provide notice that the additional costs will now be reclaimed.
- An invoice will be issued detailing the additional cost incurred, taking account of time and resources in resolving the specific area(s) of poor performance and in accordance with the charging scale set out in this document. A report will be presented to the quarterly Committee meeting detailing charges levied against scheme employers and outstanding payments.
- If poor performance continues, impacts the Fund's ability to perform statutory functions and/or measures are not being taken by the employer to address this, the Fund may need to report the employer to The Pension Regulator.

4.3 Policy on Charging Employers for Poor Performance

The LGPS regulations provide pension funds with the ability to recover from a scheme employer any additional costs associated with the administration of the scheme incurred as a result of the poor level of performance of that scheme employer. Where any such additional costs are to be recovered by the Fund, written notice will be provided stating:

- the reasons that the scheme employer's poor performance contributed to the additional cost;
- the amount of the additional cost incurred;
- the basis on how the additional cost was calculated; and
- the provisions of the administration strategy relevant to the decision to give notice.

It is the policy of the Fund to recover additional costs incurred in the administration of the scheme as a direct result of the poor performance of any scheme employer (including the administering authority). With the objective of ensuring fairness across employers in avoiding other employers paying more to cover the higher administration costs incurred by others.

Please note that 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 under this policy.

4.4 Charging Scales for Administration

The table below sets out the charges which the Fund will levy on a scheme employer who fails to meet the standards required. Each item is referred to in the 'Scheme Employer Performance Measurement' section of this document.

| Item | | Charge |
|------|--|---|
| 1) | Payment of future service contributions Failure to make payment of monthly employee and employer contributions ¹ in full by the 19th of the following month | £100 per occasion plus interest ² |
| 2) | Monthly data collection Failure to comply with the following requirements: <ul style="list-style-type: none"> • Submission of the member data file by 22nd of the following month • Submission of the web remittance advice by 22nd of the following month | £50 for each month the data file and/or web remittance advice is received after 22nd (ie, both items must be received so as to incur no penalty). There after for each monthly data file the charge will increase as follows: <ul style="list-style-type: none"> • 5p per member³ per working day late for the first month following the deadline • 10p per member³ per working day late for the second month following the deadline • 15p per member³ per working day late for the third month following the deadline and every month thereafter A minimum daily rate will be set at: <ul style="list-style-type: none"> • £5 per day for the first 30 days following the deadline • £10 per day for the second 30 days following the deadline • £15 per day for the third 30 days and thereafter following the deadline Assessment of the overall charge will be made in aggregate at year-end of 31 March (final monthly file to be received by 19 April) to include any charges in (3) below. Invoices will subsequently be issued where a charge is applicable. |
| 3) | Monthly data quality review⁴ Quality of the information provided to be below the acceptable tolerance level set at 5% of the employer active member count ³ (tolerance level will be assessed in aggregate until year-end date of the monitoring period) | The Fund will recover costs for the work involved to resolve these errors. Costs will be based on officer hourly rates, but will be determined based on the resources required to address errors above the tolerance in aggregate over a 12-month period and will be levied to include any charges incurred as a result of (2) above. |
| 4) | Quality and timeliness of the provision of data To provide the Fund with accurate data (as detailed in the regulations) in a timely manner as specified in this strategy | The Fund will recover costs for the additional work involved to resolve these issues, in the context of persistent poor performance. Costs will be based on officer hourly rates and will be determined based on the resources required. |
| 5) | Bulk member record amendments Correction or amendments of member records en masse as a result of employer initiatives, policy decisions or prior incorrect notifications | The Fund will recover the cost for the work involved. Costs will be based on officer hourly rates. |

¹Future service contributions including additional contributions, eg, APP and APCs

²Interest will be charged in accordance with Regulation 44 of the LGPS administration regulations, which states interest should be charged at Bank of England base rate plus one per cent

³For the purposes of monitoring and the application of charges the active member count will be set as at 1 April of the monitoring period (ie, based on the monthly data file for the 1 April in the monitoring period)

⁴A file will be rejected for one or more of the following reasons:

- Incorrect file layout
- Data formatting issues, eg, mandatory fields not populated, inclusion of incorrect characters, ie, speech marks, etc.
- The key financials in the data file do not balance with the final statement

4.5 Feedback From Employers

Employers who wish to provide feedback on the performance of the Fund against the standards in this administration strategy should email comments to wmpfemployerliaison2@wolverhampton.gov.uk

This feedback will be incorporated into the quarterly reports to the Committee.

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