

Engagement Roadmap

West Midlands Pension Fund and Employers



Employer Engagement Roadmap

This guide covers:

- Background and Fund structure
- Purpose of the Engagement Roadmap
- Responsibilities of the Fund
- Expectations of the employer by the Fund
- Implications of low levels of engagement on successful partnerships
- What types of engagement will the Fund undertake?
- How will the Fund monitor and communicate areas of improvement with employers?
- Further information
- Contacts for discussion
- Appendices: Escalation Procedures
 - Benefit administration queries
 - Late and non-submission of monthly data
 - Data queries

BACKGROUND AND FUND STRUCTURE

The West Midlands Pension Fund is one of the largest pension funds in the United Kingdom with over 620 contributing employers. To maintain a high level of customer service, it is essential that the Fund develops strong partnerships with its stakeholders.

The City of Wolverhampton Council is the administering authority for the West Midlands Pension Fund under the Local Government Pension Scheme (LGPS). The LGPS is established by statute and its purpose is to provide death and retirement benefits for all eligible employees. The Fund is not a legal body in its own right, and all contracts and assets are held in the name of the City of Wolverhampton Council who became the administering authority under the Local Government Act 1985.

The Fund covers the seven districts in the West Midlands together with numerous other public sector employers. A full list of the employers within the Fund is contained within the Fund's annual report, available on request.

The City of Wolverhampton Council delegates responsibility for the administration and management of the Fund to the Pensions Committee which comprises 20 trustees (ten City of Wolverhampton Council members, one elected member from each of the six district councils and four (non-voting) trade union representatives), together with 12 Pensions Board members and 135 full-time equivalent staff.

The Managing Director of the City of Wolverhampton Council, who is also the Head of Paid Service, delegates certain responsibilities to the Director of Pensions who, in turn, delegates to officers.

In addition, the Fund has the statutory Local Pensions Board whose role is to assist in the good governance of the scheme by ensuring compliance with statutory and regulatory duty; they have no decision-making powers. The Local Pensions Board consists of an equal number of employer (6) and member (6) representatives.

All meet together as the Fund, which has ultimately responsibility for the management and administration of the West Midlands Pension Fund.

The Fund is always hard at work providing a customer-focused, quality service delivered cost-effectively, with the aim of securing the future of its members pensions:



This document has been created to define the methods by which the Fund will support employers in attaining the expected standards and to formalise the ways in which it will support performance and monitor compliance. Furthermore, the Employer Engagement Roadmap has been designed to compliment both the *Pension Administration Strategy* and the *Customer Engagement Strategy* to improve outcomes for all stakeholders of the Fund.

PURPOSE OF THE ENGAGEMENT ROADMAP

The Fund needs to ensure that employers are providing accurate, relevant and timely information to ensure compliance with the Local Government Pension Scheme Regulations 2013, the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 and other statutory requirements. The purpose of the Engagement Roadmap is to outline the framework the Fund has implemented to enhance the performance of both the Fund and its employers through partnering and support.

The Fund is dedicated to evolving, developing and communicating effectively with its members and employers to drive efficiencies and deliver value-for-money services.

The intentions of the Engagement Roadmap are:

- to ensure the Fund is able provide a high-quality pension service to members and employers in line with the agreed standards outlined in the Pension Administration Strategy (PAS);
- to develop a collaborative partnership with the Fund and scheme employers to improve efficiency, quality and service to Fund members;
- to ensure the performance standards expected from employers are reasonable, monitored and delivered ensuring both the Fund and its employers are able to meet statutory responsibilities whilst ensuring the delivery of good customer service to Fund members;
- to ensure the Fund has an efficient and effective monitoring procedure for ensuring employer performance in line with the PAS;
- to provide feedback and support to help aid improvement and where appropriate levy charges where the Fund identifies a failure to meet the required standards as required by the PAS; and
- to provide transparency and clarity to employers outlining the actions that may be taken where performance standards are not met and/or when persistent non-compliance occurs.

RESPONSIBILITIES OF THE FUND

- The Fund will endeavor to maintain accurate and up-to-date employer contact information through the regular feedback and contact it has with its employers, noting the reliance on employers to inform the Fund of any changes.
- The Fund will provide ongoing support tools for employers to include but not limited to:
 - employer coaching
 - employer peer group
 - Employer Brief (quarterly newsletter)
 - web portal access including online support guides
 - employer surveys
 - telephone and email support
 - technical pensions support/regulatory updates
 - bulk data import functionality via the web portal

EXPECTATIONS OF THE EMPLOYER BY THE FUND

The Fund requests that employers recognise the importance of ensuring the following:

- The Fund is to be kept informed of any personnel/ resource changes to facilitate engagement. Changes to contact details are to be communicated to the Fund in a timely manner to avoid delays in the transfer and exchange of information.
- Engage with the Fund at an early stage where issues are identified that may impact on performance and/or data quality. Changes to the organisational structure which may impact on the Employers ability to perform its statutory functions to be communicated at the earliest opportunity.
- Embrace the Fund's provision of support. By actively participating with the Fund, employers can help shape the future service provision and become partners for success. Through effective partnership working the identification of new working practices and solutions will help exceed member expectations.
- Keep the Fund updated on significant movement of membership profile. Notification should be given to the Fund in advance where possible of any employer initiatives, policy decisions or practices which impact on member benefits.

IMPLICATIONS OF POOR PERFORMANCE AND LOW LEVELS OF ENGAGEMENT

Where performance issues exist or levels of engagement are deemed to be low, the Fund will work with employers. However, if improvement is not seen there could be the following implications:

- Members may not receive accurate benefit information and/or benefits may not be paid on time.
- Increased complaints from members where information and/or benefits are unable to be provided in a timely manner or are incorrect.
- Payments being made to members in recognition of distress and inconvenience (as and when directed by the Pension Ombudsman) where poor performance impacts on the ability to provide correct information and/or benefits.
- Reputational and potential financial consequences for the Fund and/or its employers where under performance results in a breach report being made to The Pensions Regulator.
- Reduced capacity for the Fund and/or employer to be able to carry out statutory functions
- Increased administration costs for the Fund, which may be passed to the relevant employer.

WHAT TYPES OF ENGAGEMENT ACTIVITIES WILL THE FUND UNDERTAKE?

The Fund will provide support and training to employers to aid improvement and increases performance levels using the following channels:

- Employer dashboards
- Employer coaching
- Bespoke training sessions and workshops
- One-to-one meeting attendance at the Fund's office or employer premises.
- Employer Peer Group
- Online Videos
- Employer consultation groups
- Online guidance and assistance

HOW WILL THE FUND MONITOR AND COMMUNICATE AREAS OF IMPROVEMENT WITH EMPLOYERS?

Data Improvement Plan

The Fund's Data Improvement Plan sets down its responsibilities in relation to record keeping and data quality, providing assurance to members that their data is managed in compliance with the statutory obligations placed upon the Fund.

The plan identifies areas for improvement in the Fund's record keeping based on complex analysis of the information the Fund holds and receives from its employers about its members.

Trustees and Scheme Managers should review their data at least once a year and if there are any issues, put an improvement plan in place to address them. The improvement plan clearly sets out the steps to be taken to improve the data held.

Failure to maintain accurate records can put the Fund and its officers at risk of failing to meet their legal obligations which could result in the Regulator taking enforcement action to remedy and rectify inaccurate data. There is therefore both a legal and reputational risk to holding inaccurate data.

Employer Brief

The Fund's quarterly newsletter will be used to communicate on areas of interest and benefit to its entire employer base – to include but not limited to:

- Technical, regulative and legislative updates
- Provide details on upcoming member and employer events
- Feedback on employer events
- Top tips to drive efficiencies and increase capacity
- Information regarding the Fund's current focus and workloads
- Information deemed useful to aid employer administration

Next Steps

Where the Fund identifies a need for intervention, it will monitor performance and the rate of improvement with regards to data quality and timeliness of employer requirements via the use of employer dashboards initially. The Fund will request to meet with the employer to discuss a way forward.

Where all options have been exhausted with respect to support or where the offer of assistance from the Fund is declined or ignored by the employer, the Fund may use its powers under the LGPS Regulations 2013 which can extend to consideration of a report to The Pension Regulator.

The following circumstances may result in the Fund taking more formal action against an employer:

- Performance continues to fall below that expected, and no improvement can be measured.
- All reasonable steps have been taken and exhausted by the Fund to improve employer performance.
- The Fund's ability to perform statutory functions and/or measures has been impacted.
- Additional costs are being incurred by the Fund due to employer underperformance.

The Appendices to this document provide clarification of the escalation procedures the Fund intends to follow where the performance of an employer falls below the required level, and where one or more of the above situations has or is liable to occur.

FURTHER INFORMATION

This document should be reviewed in conjunction with the following documents which can be found at www.theFundonline.com/corporateinfo

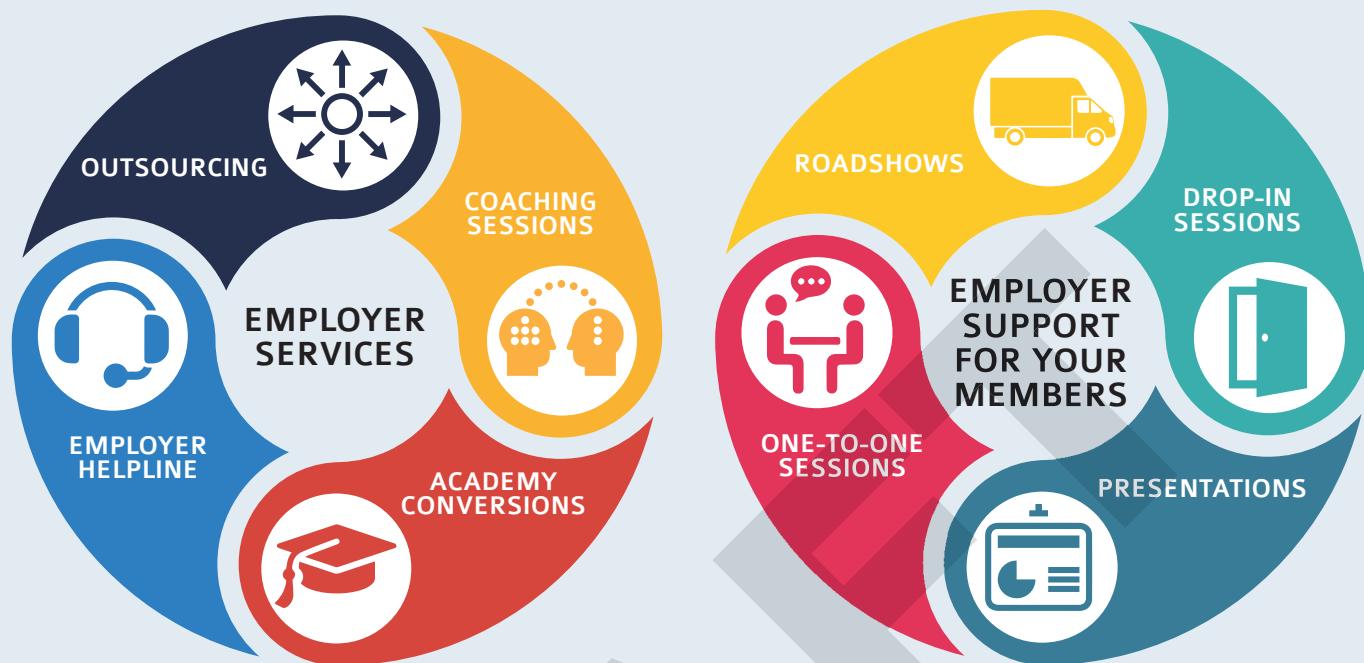
- Pension Administration Strategy (PAS)
- Customer Engagement Strategy
- Customer Engagement Plan
- Communications Policy Statement
- Service Plan

The Pension Regulator Code of Practice 14 (Governance and administration of public service pension schemes is referred to in this report. A full copy of this can be found at www.thepensionsregulator.gov.uk/codes/code-governance-administration-occupational-dc-trust-based-schemes.aspx

For more information on the rules governing the pension scheme, please visit <https://www.lgpsmember.org>

For more information on LGPS Regulations and Guidance, please visit <http://lgpsregs.org/schemeregs/lgpsregs2013/timeline.php>

CONTACTS FOR FURTHER DISCUSSION



For further information, please see contact details set out below:

WMPFemployerliaison2@wolverhampton.gov.uk

0300 111 6516

APPENDIX 1

ESCALATION PROCEDURES

a) Benefit administration queries escalation procedure

Timeline	Action	Responsible team/officer at the Fund	Employer contact level
Day 0	Original query raised with employer ¹	Benefit Operations – Pensions Administrator/Assistant	HR/Payroll/Pension Manager
Day 10	Contact the employer again to chase the response to the query ²	Benefit Operations – Pensions Administrator/Assistant	HR/Payroll/Pension Manager
Day 20	Contact the employer again to request response to the query and agree a date for response ³	Benefit Operations – Team Leader	HR/Payroll/Pension Manager
Day 25	Contact the employer to chase the response to the query ⁴	Benefit Operations – Team Leader	HR/Payroll/Pension Manager
Day 30	Contact the employer to confirm the details have been passed to Employer Services for further escalation ⁵	Benefit Operations – Team Manager	HR/Payroll/Pension Manager
By Day 40	Employer Services to contact employer to confirm a date for response on outstanding queries and/or agree a date for a formal meeting ⁶	Employer Services	HR/Payroll/Pension Manager

¹ When the original query is raised with the employer, the employer is advised that they have ten working days to respond to the query. The member should be updated of the current position at this point.

² When chasing the query, the Fund Officer should advise that a response is required within ten working days, at which point, the case will be referred to a team leader at the Fund for further escalation.

³ Where necessary the team leader will arrange for all outstanding queries to be collated for sending to the employer. An email will be sent alerting the employers that a query remains outstanding and will emphasise that delays may impact the calculation and payment of any member benefits due. When agreeing a date for response, the employer should be advised that the case will be referred to senior personnel within the employer if a satisfactory response is not received within the timescale agreed (suggest five working days, unless the employer offers an alternative mutually agreeable date).

⁴ When chasing the outstanding information, the employer should be advised that the case will be escalated internally at the Fund to the Employer Services team for raising further with the employer if a response/update is not received within five working days.

⁵ Contact the employer to confirm the issues have been escalated internally at the Fund due to the impact non-compliance is having on the provision of services to members by the Fund. Benefit Operations Manager and/or Team Leader to liaise with the Employer Services team to discuss what actions need to be taken in order to resolve the ongoing issues.

⁶ A suitable date for the response to the query to be submitted should be determined at this point (usually three working days). At this point, we should advise the employer that they may be registered on a performance monitoring log if there is no response to the query in the agreed timescale. In addition, a reminder to be made to the employer of the statutory and disclosure requirements which the Fund must adhere to. The Fund to also advise that, if required (particularly for retirements and deferments), we will write to the individual member within two months of the date of retirement/deferment to advise that due to outstanding queries with the employer the Fund has been unable to process their benefits until the queries are resolved.

b) Late and non-submission of monthly data and/or payment of contributions escalation procedure

Timeline	Action	Responsible team/officer at the Fund	Employer contact level
Day -7	Bulk reminder email ¹	Employer Services	Employer main payroll contact
Day 5	Overdue monthly submission bulk email ²	Employer Services	Employer main payroll contact
Day 10	Telephone call to be made to employer payroll contact ³	Employer Services	Employer main payroll contact
Day 20	Further emails and telephone calls to principal employer contacts.	Employer Services	HR/Payroll/Pension Manager
Day 30+	Email or telephone call to principal employer contacts ⁴	Data Manager/ Relationship Management Officer	HR/Payroll/ Pension Manager
Day 50	Email or telephone call to the employer to discuss the outstanding queries and agree a date for responses or a formal meeting ⁵	Head of Client and Funding Management	Head of Service/Director/Chief Executive
Day 90	Formal letter detailing poor performance to be issued requesting specific actions be taken ⁶	Head of Client and Funding Management	Head of Service/Director/Chief Executive

¹ An email will be sent reminding all employers of the deadline date and providing links to online tools to support with the process. The email urges the employer to make contact in advance in case of any issues that may delay or prevent timely submission and sets out the implications of non-compliance.

² An email will be sent alerting the employers that their monthly submission data file and/or contribution payment is now overdue and will state that delays may impact of the calculation of any member benefits. The email will once again provide links to online support tools and set out the implications of non-compliance.

³ If the monthly data has not been submitted and/or non-payment of contributions has occurred the employer or payroll representative will be contacted by the Employer Services team to find out what the issues are and when we can expect submission to commence. A follow-up email to be sent to the employer by the Fund to confirm the agreed actions.

⁴ Email or telephone contact to be made by the Data Manager or Relationship Management Officer on a weekly basis. Engagement with the employer to be documented by the Fund.

⁵ If continued non-submission and/or non-payment occurs, contact to be made by the Head of Client and Funding Management to arrange a formal meeting to discuss the implications of poor employer performance, both in terms of member benefits and possible breach reports being made to The Pensions Regulator. The employer will be reminded at this stage of its legal duty to make payment of contributions and the Fund's statutory duty to issue annual benefit statements to active members by the 31 August and, that failure to do so, could result in the Fund reporting both the Fund and the employer to The Pensions Regulator.

⁶ Continued non-compliance will result in the issuing of a formal letter by the Fund highlighting the issues experienced in obtaining statutory information from the employer. Details of engagement attempted, support given and issues arising as a result of the employer's poor performance to be included. The requirements of the Fund will be set out clearly within the letter together with the impact on the employer, the members and the Fund if significant efforts are not taken to improve the situation. A request for a face-to-face meeting will be made and notice given that additional costs may be reclaimed from the employer.

c) Data queries escalation procedure (including monthly submissions)

Timeline	Action	Responsible team/officer at the Fund	Employer contact level
Day 0	Monthly data or query response due to be received by the Fund ¹	N/A (Employer)	
By Day 20	Issue queries on data submitted to the employer ²	Business Performance and Data Team	Employer main payroll contact
Day 40+	Continuous email or telephone contact to be attempted by the Fund to the employer if no response received to outstanding queries ³	Business Performance and Data Team/ Employer Services	Employer main payroll contact Employer main payroll contact
By Day 50	Email or telephone call to the employer to discuss any outstanding queries and to agree a date for responses or a formal meeting ⁴	Data Manager/ Relationship Management Officer	Employer main payroll contact
Day 70+	Email or telephone call to the employer to invite to a formal meeting to discuss outstanding queries and agree an action plan ⁵	Head of Client and Funding Management	Head of Service/Director/Chief Executive
Day 90	Formal letter detailing poor performance to be issued requesting specific actions be taken ⁶	Head of Client and Funding Management	Head of Service/Director/Chief Executive

¹ To be received by 19th of each month together with the web remittance advice detailing financials.

² Data queries to be issued by the Fund within 20 working days. For larger employers and districts it is anticipated this may take up to 20 working days to collate however for smaller employers this may be less. A request to be made for query responses to be returned within 14 working days of the original queries being returned (to be extended to no more than 20 working days for larger employers dependent on volume and nature of queries, in which case the timeline would be extended by this amount).

³ Date of first reminder email issued to be dependent on size of employer. First reminder to be issued between 14 and 20 working days from date of original request by the Fund. Size of Employer is defined by the active member count being greater or less than 1,000.

⁴ Data Manager and/or Relationship Management Officer to make contact with the employer to discuss the outstanding requirements, offer additional support and discuss the implications of non-submission of data. Agreed actions to be confirmed by email from the Fund to the employer – email to state that non-compliance will result in the case being referred internally to the Head of Funding and Client Management to make contact with the employer's Director/Chief Executive.

⁵ The Head of Funding and Client Management to make contact with the Employer to discuss the outstanding requirements, and discuss the possibility that non-submission of data may result in the Fund levying a charge or in extreme cases submitting a breach report to The Pensions Regulator. The employer should be reminded at this stage of the Fund's statutory duty to issue annual benefit statements to active members by the 31 August and that failure to do so could result in the Fund reporting both the Fund and the employer to The Pensions Regulator.

⁶ Continued non-compliance will result in the issuing of a formal letter by the Fund, highlighting the issues experienced by the Fund in obtaining statutory information from the employer. Details of engagement attempted, support given and issues arising as a result of the employer's poor performance to be included. The requirements of the Fund will be set out clearly within the letter together with the impact on the employer, the members and the Fund if significant efforts are not taken to improve the situation. A request for a face-to-face meeting will be made and notice given that additional costs may be reclaimed from the employer.