

CITY OF  
WOLVERHAMPTON  
COUNCIL

# Pensions Committee Meeting

Wednesday, 23 June 2021

Dear Councillor,

## **PENSIONS COMMITTEE - WEDNESDAY, 23 JUNE, 2021**

I am now able to enclose, for consideration at next Wednesday, 23 June, 2021 meeting of the Pensions Committee, the following reports that were unavailable when the agenda was printed.

<b>Agenda No</b>	<b>Item</b>
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10	<b><u>Customer Engagement Update</u></b> (Pages 3 - 20)
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[To note the 2021 Employer Engagement Roadmap.]

If you have any queries about this meeting, please contact the Democratic Services team:

**Contact** Fabrica Hastings

**Tel** 01902 5552699

**Email** [Fabrica.Hastings2@wolverhampton.gov.uk](mailto:Fabrica.Hastings2@wolverhampton.gov.uk)

**Address** Democratic Services, Civic Centre, First floor, St Peter's Square,  
Wolverhampton WV1 1RL

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# ENGAGEMENT ROADMAP

## WEST MIDLANDS PENSION FUND AND EMPLOYERS

JUNE 2021



West Midlands Pension Fund

## Employer training sessions

A comprehensive suite of live [webinar sessions](#) are available to all scheme employers to assist with day to day scheme administration, employers' roles and responsibilities within the Fund and navigation of the Fund's Employer Hub.

[Coaching sessions](#), held at the Fund offices, are also available – details of these events can be found on the Fund website.

## Monthly data collection (MDC)

Data requirements: Personal data/Financial data/Member employment details/Joiner data

How to upload your file:

- Use the file checker before starting process
- Via Employer Hub process
- No later than 19th of following month

Please see "[Monthly Data Submissions](#)" for more information on this process.

## Actuarial Valuation

Actuarial valuation reviews the funding level (the Fund assets relative to the Fund liabilities – the estimated cost of the benefits members has built up to date) and funding strategy to make sure the Fund has enough money to pay benefits as they fall due.

**Contribution setting** – the Fund actuary carries out the triennial valuation to certify the contributions required by each employer over the next three years.

**Assessing solvency** – the actuary is required to set contributions at a level which is expected to ensure the solvency and long-term cost efficiency of the Fund.

For more information, please click "[Valuation of the West Midlands Pension Fund](#)" for more information.

## Financial data collection

- Response to accounting standards bulk arrangements,
- Completion of covenant questionnaire
- Reconciliation statements

## Termination

Please see the Fund's "[Termination Policy](#)" document for more information regarding the cessation of an employer's participation in the Fund

## Application

### Admission Body

Please click "[Admission Body](#)" for more information

### Academies

Please click "[Academies](#)" for more information

## Discretionary policy statement

Under the LGPS scheme regulations employers are required to formulate, publish and keep under review a statement of policy on how they will exercise certain discretions under the new scheme. Five discretions an employer **MUST** have a policy in relation to:

- 1) Whether to permit flexible retirement
- 2) Whether to waive, upon the voluntary early payment of benefits, any actuarial reduction on compassionate grounds or otherwise.
- 3) Whether to 'switch on' the 85-year rule upon the voluntary early payment of deferred benefits
- 4) Whether to grant extra annual pension
- 5) whether to share the cost of purchasing additional pension

Please click "[Guides and sample documents](#)" for more information

## Annual Employer Health Check

The annual exercise provides employers with the opportunity to review and update information such as (but not limited to):

- Active member list/s (ensuring that any leaver documentation is submitted, where required)
- Employer Hub user/s
- Contact details

With a view to improve Annual Benefit Statement (ABS) production, thus increasing compliance with The Pension Regulator (TPR).

## Pension Administration Strategy

Sets out roles and responsibilities of employers to the Fund,

Please click "[Pension Administration Strategy](#)" for more information.

## Employer Support

The Fund provides excellent customer service to employers throughout every stage of their journey with the Fund. Details of the support offered can be found in [appendix 1](#).

Employers are also expected to engage with the Fund, at the earliest opportunity, where issues are identified that may impact on performance (including the payment of certified contributions) and data quality. If affordability concerns are raised, resulting from the current restrictions, employers can partake in the completion of the Fund's 'employer affordability assessment'- please [contact the Employer Services team](#) for further information.

# 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
- How the Fund will monitor and communicate areas of improvement with employers
- Further information
- Contacts for discussion
- Appendices
  - Engagement/support activities undertaken
  - Escalation Procedures
    - *Benefit administration queries*
    - *Late and non-submission of monthly data*
    - *Payment of contributions*
    - *Data queries*
    - *Provision of McCloud data*

## BACKGROUND AND FUND STRUCTURE

The West Midlands Pension Fund is one of the largest pension funds in the United Kingdom with over 743 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 West Midlands Integrated Transport Authority (WMITA) merged with the Fund with effect from 1st April 2019 and the roles, responsibilities and expectations set out in this document apply equally to the WMITA employers.

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's participating employers include 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**.

The Fund's Governance Compliance Statement, located on the Fund **website**, confirms the formal committee structure and includes details of employer representation and Fund interaction.

One of the Fund's key objectives is to provide 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.
- Ongoing support tools provided by the Fund are confirmed in **appendix 1**

## 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. Note it is an employers responsibility to create new user accounts in order to gain access to the Employer Hub.
- 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 are 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 meet 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.

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

### Data Management Strategy

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.

### 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 TPR.

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.

**Appendices 2a-2d** of 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](http://www.theFundonline.com/corporateinfo)

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

TPR Code of Practice 14 (Governance and administration of public service pension schemes) is referred to in this report (note this will be replaced with the singular code of practice, once introduced). A full copy of this can be found [here](#).

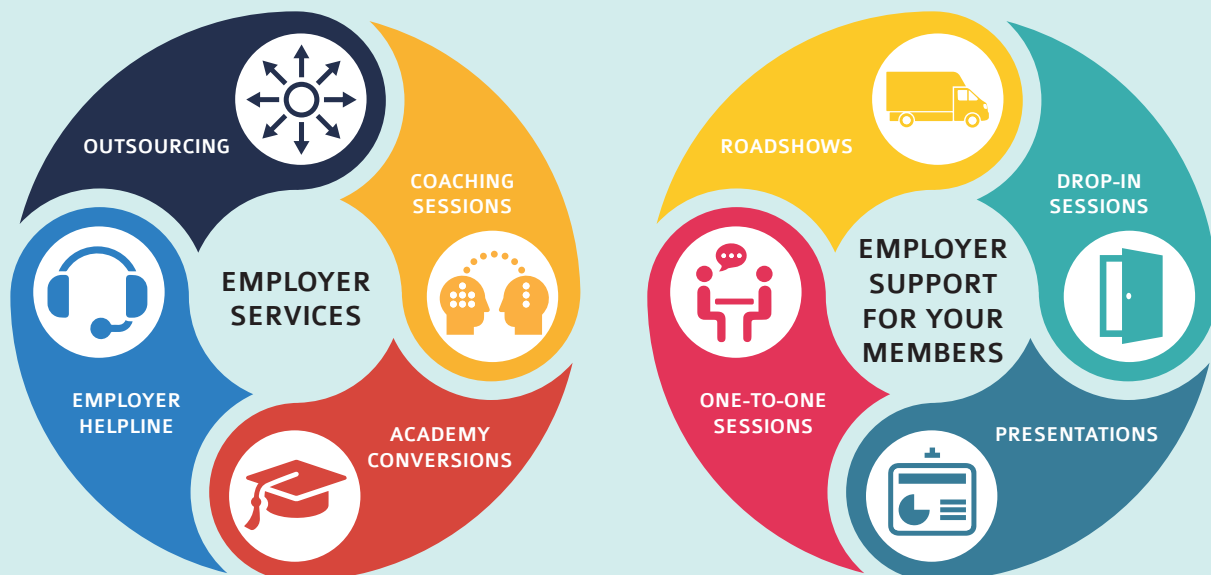
For more information on the rules governing the pension scheme, please visit

<https://www.lgpsmember.org>

For more information on LGPS Regulations and Guidance, please visit

<https://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

### Engagement/support activities undertaken by the Fund

The Fund will provide support and training to employers in order to support and increase performance levels using the following channels:

#### Employer Onboarding

Organisations named in the LGPS regulations as scheme employers and automatically participate in the scheme (i.e. academies, further and higher education corporations) and those who satisfy other conditions as confirmed in schedule 2 of the LGPS regulations), the Fund provide support throughout the employer onboarding process.

Support offered (but not limited to) includes;

- Consistent engagement including a dedicated Fund officer regarding the application process
- Website guidance and;
- Accompanying process guidance notes
- Webinars (Fund Induction and LGPS Basics)

Please note, similar assistance is provided with regards to the cessation of an employer's participation in the Fund. Further details can be located in the Fund's **termination policy**.

#### Website

In addition to the onboarding process, the employer section of the Fund website includes an abundance of information to ensure employers are able to complete their statutory functions, adhering to the Fund's requirements as set out in the Pensions Administration Strategy;

- Access to the Fund's Web Portal/Hub facility
- Support guides and video demonstrations
- Electronic forms
- Technical pensions support and regulatory updates
- Details of upcoming events/virtual sign up

#### Meetings, webinars, training events

- Employer coaching/webinars
- Bespoke training sessions and workshops
- One-to-one meeting attendance at the Fund's office or employer premises.
- Employer Support for members
- Annual General Meeting/Mid-Year Review

## **Employer Hub**

Those employers that have migrated to the Employer Hub have instant access to information such as;

- Employer Dashboards
- Active member lists
- Bulk data import functionalities (also available via the Web Portal)

Newsletters and email communications

The Fund's quarterly Employer Brief provides information deemed useful to aid employer administration, such as; legislative updates, member and employer events, feedback, Fund's current focus and workloads.

Occasionally, ad-hoc email communications are circulated to participating employers relating to specific or topical information.

## **Telephone and email support**

The dedicated Employer Services Team are on hand to assist with enquiries about the Fund and employer responsibilities. The team offers support to a variety of employer types and can be contacted on the following email address: **wmpfemployerliaison2@wolverhampton.gov.uk**

Alternatively, you can call the Fund's dedicated employer helpline on **0300 111 6516**.

## **Consultations, surveys and focus groups**

- Employer Peer Group
- Employer consultation groups
- Employer surveys

Further information regarding individual events/support can be found in the **Communications Policy Statement**.

## APPENDIX 2

### ESCALATION PROCEDURES

#### a) Benefit administration queries escalation procedure

This procedure will be monitored as roll out of new functionality is completed and usage develops.

Refund Timeline	Action	Responsible team/officer at the Fund	Employer contact level
Day 0	<ul style="list-style-type: none"> <li>Query to be raised over the phone with employer. If inconvenient with employer – arrange suitable time to call</li> <li>More complex query – S15 sent to employer</li> </ul>	Transactions and Exits – Pensions Assistant / Pensions Officer	Employer main payroll / Employer contact
Day 10	<ul style="list-style-type: none"> <li>Chaser phone call made to employer</li> <li>2nd S15 sent if required</li> </ul>	Transactions and Exits – Pensions Assistant / Pensions Officer	Employer main payroll / Employer contact
Day 20	<ul style="list-style-type: none"> <li>In the absence of a reply, assumption/s to be made where possible or process actioned with original information supplied by employer<sup>1</sup></li> <li>If outstanding query could be a serious detriment to Fund/member, an Operations Team Leader will contact employer to confirm a final response date</li> </ul>	Transactions and Exits – Pensions Assistant / Pensions Officer	HR / Payroll / Pension manager
Day 30	<ul style="list-style-type: none"> <li>In the absence of a reply, Employer Services to confirm a date for response and/or agree a date for a formal meeting</li> </ul>	Employer Support Officer / Relationship Management Officer	Head of Service / Director / Chief Executive

<sup>1</sup> Where assumptions have been made the Fund will advise the member accordingly, should they wish to query the pay information used with the employer. Assumptions can have a financial implication on employers and, if revisions are requested, can also result in a possible charge for benefit recalculations.

Deferment Timeline	Action	Responsible team/officer at the Fund	Employer contact level
Day 0	<ul style="list-style-type: none"> <li>Query to be raised over the phone with employer. If inconvenient with employer – arrange suitable time to call</li> <li>Query to be raised via Employer Webtray</li> <li>If unable to raise query via the Employer Webtray, S15 to be issued to employer</li> </ul>	Transactions and Exits – Pensions Assistant / Pensions Officer	Employer main payroll / Employer contact
Day 10	<ul style="list-style-type: none"> <li>Chaser phone call made to employer</li> <li>Reminder correspondence issued to employer</li> </ul>	Transactions and Exits – Pensions Assistant / Pensions Officer	Employer main payroll / Employer contact
Day 20	<ul style="list-style-type: none"> <li>In the absence of a reply, assumption/s to be made where possible or process actioned with original information supplied by employer<sup>1</sup></li> <li>If outstanding query could be a serious detriment to Fund/member, an Operations Team Leader will contact employer to confirm a final response date</li> </ul>	Transactions and Exits – Pensions Assistant / Pensions Officer / Operations Team Leader	HR / Payroll / Pension manager
Day 30	<ul style="list-style-type: none"> <li>In the absence of a reply raised via webtrays, a report will be issued to confirm all outstanding queries with the requirement that the queries are answered within 10 working days.</li> <li>Employer Services to confirm a date for response and/or agree a date for a formal meeting</li> </ul>	Operations Team Leader / Employer Support Officer / Relationship Management Officer	Head of Service / Director / Chief Executive

<sup>1</sup> Where assumptions have been made the Fund will advise the member accordingly, should they wish to query the pay information used with the employer. Assumptions can have a financial implication on employers and, if revisions are requested, can also result in a possible charge for benefit recalculations.

## b) Late and non-submission of monthly data escalation procedure

Timeline	Action	Responsible team/ officer at the Fund	Employer contact level
Day 1+	Overdue monthly submission email issued <sup>1</sup>	Employer Services / Employer Support Assistant	Employer main payroll / employer contact
Day 10+	Further emails and telephone calls to employer/payroll representative contacts <sup>2</sup>	Employer Support Assistant / Officer	Employer main payroll / employer contact
Day 20+	Email/telephone call to principal employer contacts to discuss required support regarding the outstanding queries and agree a file submission date <sup>3</sup>	Employer Support Officer / Employer Relationship Officer	HR / Payroll / Pension manager
Day 40+	Email/telephone call to the employer to discuss the outstanding queries and agree a date for a formal meeting <sup>4</sup>	Employer Relationship Officer / Relationship Management Officer	Head of Service / Director / Chief Executive
Day 70+	Notification to Senior Management Team of outstanding queries <sup>5</sup>	Relationship Management Officer	N/A
Day 90+	Formal letter issuance in addition to consideration of breach report to TPR and potential charge levied in accordance with the PAS. <sup>6</sup>	Assistant Director – Pensions / Director	Head of Service / Director / Chief Executive

<sup>1</sup> An email will be sent alerting the employer, and payroll representative (if different), that the relevant monthly submission data file is now overdue and will state that delays may impact of the calculation of any member benefits. The email will provide links to online support tools and set out the implications of non-compliance.

<sup>2</sup> A second reminder email will be issued to the employer and payroll representative to alert them that the relevant monthly submission data file remains outstanding. In the interim the employer/payroll representative will be contacted by the Employer Services team to discuss the proposed file submission date. A follow-up email to be sent to the employer by the Fund to confirm any agreed actions.

<sup>3</sup> Email or telephone contact to be made to senior employer/payroll representative contacts to discuss required support regarding monthly data submission and agree a submission date. The employer will be reminded at this stage of the Fund's statutory duty to issue ABSs to active members by the 31 August- failure to issue could result in the Fund reporting both the Fund and the employer to The Pensions Regulator. in addition to issuing a charge in line with the PAS.

<sup>4</sup> If continued and repeat non-submission or late submission is recorded, contact to be made, to senior contact/s, by the Employer Relationship Officer/Relationship Management Officer 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.

- <sup>5</sup> If continued and repeat non-submission or late submission is recorded, the Fund's Senior Management Team will be notified including details of engagement attempted, support given and issues arising as a result of the employer's poor performance.
- <sup>6</sup> 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. Expected employer action will be clearly set out within the letter, in addition to confirmation of any charges levied in accordance with PAS and confirmation of TPR report issuance (if completed). A request for a face to face meeting will be made.

**c) Payment of contributions escalation procedure**

Contributions due by 22nd of the following month

Timeline	Action	Responsible team/ officer at the Fund	Employer contact level
Up to Day 5	Overdue monthly contributions	Finance	Employer main payroll / employer contact
Up to Day 10	Telephone call to be made to employer payroll contact	Finance	Employer main payroll / employer contact
Up to Day 20	Further emails and telephone calls to principal employer contacts <sup>1</sup>	Employer Services	HR / Payroll / Pension manager
Up to Day 40	Email or telephone call to the employer to discuss the outstanding contributions and agree a date for payment or a formal <sup>2</sup>	Relationship Management Officer	Head of Service / Director / Chief Executive
Up to Day 90	Formal letter to arrange meeting to discuss implications of non-payment	Assistant Director – Pensions / Director	Head of Service / Director / Chief Executive

<sup>1</sup> If 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 payment. A follow-up email to be sent to the employer by the Fund to confirm the agreed actions.

<sup>2</sup> If continued non-payment occurs, contact to be made by the Relationship Management Officer to arrange a formal meeting to discuss the implications of non-payment and consideration of a report 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 ABSs 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. Also a charge could be issued in line with the PAS



#### d) Data queries escalation procedure (in respect of monthly data collection)

Timeline	Action/Status	Responsible team/officer at the Fund	Employer contact level
Day 0	Monthly data submission received by the Fund <sup>1</sup>	N/A (Employer)	
By Day 20	Monthly return feedback sent to the employer <sup>2</sup>	Business Performance and Data Team	Employer main payroll contact
By Day 40+	No employer response received by the Fund in relation to outstanding data on monthly return feedback <sup>3</sup>	Business Performance and Data Team/ Monthly Submission Data Lead	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 <sup>4</sup>	Monthly Submission Data Lead / Employer Relationship Officer	Employer main payroll contact / strategic employer contact
By Day 70+	Email or telephone call to the employer to invite to a formal meeting to discuss outstanding queries and agree an action plan <sup>5</sup>	Data Manager / Relationship Management Officer	Head of Service / Director / Chief Executive
Day 90+	Formal letter detailing poor performance to be issued requesting specific actions be taken <sup>6</sup>	Assistant Director – Pensions	Head of Service / Director / Chief Executive

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

<sup>2</sup> 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).

<sup>3</sup> 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.

<sup>4</sup> Monthly Submission Data Lead/Employer Relationship 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 Assistant Director (Pensions) to make contact with the employer's Director/Chief Executive.

<sup>5</sup> The Assistant Director (Pensions) 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 ABSs 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.

- <sup>6</sup> 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.

### e) Provision of data appropriate to the McCloud ruling

Please refer to the Fund **website** for more detailed guidance for requirements relating to the McCloud judgement.

Timeline	Action/Status	Responsible team/officer at the Fund	Employer contact level
Day 0	31st October 2021- Submission of all data (up to 31st March 2021) received by the Fund  31st May 2022- Submission of all data (for the period 1st April 2021 to 31st March 2021) received by the Fund	N/A (Employer)	
Day 20+	Overdue data submission email issued	WMPF McCloud Project Group	Employer main payroll / employer contact
Day 40+	No employer response received by the Fund in relation to outstanding McCloud data	WMPF McCloud Project Group	Employer main payroll / employer contact
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	WMPF McCloud Project Group / Employer Support Officer	Employer main payroll contact / strategic employer contact
Day 70+	Email/telephone call to principal employer contacts to discuss outstanding queries and agree an action plan	Employer Relationship Officer	Head of Services / Director / Chief Executive
Day 90+	Formal letter detailing poor performance to be issued requesting specific actions to be taken	Relationship Management Officer / Director of Pensions	Head of Services / Director / Chief Executive

West Midlands Pension Fund  
PO Box 3948  
Wolverhampton  
WV1 1XP