



City of Westminster

Pension Administration Strategy
City of Westminster Pension Fund
Effective from 1st April 2024



Contents

1. Introduction
 2. Purpose of the Pension Administration Strategy (PAS)
 3. Roles and Responsibilities
 - 3.1 The Employer's Roles and Responsibilities
 - 3.2 The Administering Authority's Roles and Responsibilities
 4. Performance Monitoring
 5. Communication, Resources and Available Support
 6. Feedback and Review Process
- Appendix A – Performance Standards - The City of Westminster Pension Fund Employer Targets and PAS Charges
- Appendix B – Performance Standards - The Administering Authority's Roles and Responsibilities
- Appendix C – Performance Standards - Employer Performance Benchmarking Guide

1. Introduction

This is the Pension Administration Strategy of the City of Westminster Pension Fund (COWPF “the Fund”) about the Local Government Pension Scheme (LGPS) Fund.

The administration of the Fund has primarily been outsourced to Hampshire Pension Services (HPS) from the 8th of November 2021. It’s important to note that whilst some administration documents and guides are in common with HPS, this PAS is specifically for COWPF. COWPF as an LGPS Administering Authority (AA) determines our PAS and its application.

This document:

- ♣ Confirms the purpose of the strategy and says what it is intended to achieve.
- ♣ Outlines the role of COWPF scheme employers and sets out their expected levels of performance.
- ♣ Outlines the role of COWPF and sets out its expected levels of performance.
- ♣ Explains how the performance of COWPF and its employers will be monitored.
- ♣ Explains what actions might be taken when employers do not meet the requirements.
- ♣ Confirms how COWPF will communicate with its employers.
- ♣ Details the resources and support that is available for employers to access the - Employer Hub Portal

The LGPS is a statutory scheme, established by an Act of Parliament. Regulation 59 of the LGPS Regulations outline the key responsibilities of administering authorities and fund employers. The regulations include specific provisions recommending the fund develops a Pensions Administration Strategy (PAS). The COWPF has had an agreed PAS for a number of years, and this is periodically reviewed by the Fund in consultation with the employers to ensure that the PAS remains fit for purpose.

The PAS includes a schedule of additional administrative costs under Regulation 70 of the LGPS Regulations 2013, which provides scope for pension funds to recover costs where additional costs are being incurred due to an employer’s level of performance.

The PAS is linked to the following statutory documents of the Fund which are available on COWPF website www.wccpensionfund.co.uk

- ♣ Retention Policy and Full Privacy Notice
- ♣ Communications Policy
- ♣ Annual Report
- ♣ Statement of Investment Principles

Under no circumstances does the PAS override any provision or requirement of the LGPS regulations nor is it intended to replace the more extensive guide provided by the Employers' Guide available on the Hampshire Pension Services website [Employer Administration Tools and Guidance | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/employment/employer-administration-tools-and-guidance) for day-to-day operations.

2. Purpose of the Pension Administration Strategy

The purpose of the PAS is to set out the relationship between the Fund and its member employers so that together we can meet our statutory obligations for members and beyond that gives members comfort in their pension with us. The PAS is being amended from April 1, 2024, following excellent work by our fund employers and administrators to clean COWPF data since we moved to HPS in November 2021. The COWPF is now in a position to broaden the PAS and to ensure progress made by everyone is maintained. The purpose of the PAS Summary is below.

- ♣ Provides clarity on the key roles and responsibilities of COWPF and its employers.
- ♣ Sets expectations and confirms the targets that COWPF and its employers need to work to
- ♣ Helps all parties to achieve regulatory compliance by providing a framework that is clear and user-friendly.
- ♣ Assists COWPF and its scheme employers in adhering to the Pensions Regulator's Codes of Practice
- ♣ Complements procedures that help all parties to meet their data protection and data quality responsibilities.
- ♣ Helps to ensure all parties provide the best possible service to scheme members and other relevant stakeholders.
- ♣ Emphasises the importance of the shared role that COWPF and its scheme employers have in ensuring excellent service delivery to scheme members.
- ♣ Promotes efficient working practices, hand in hand partnership with transparency and a culture of continual improvement.

3. Roles and Responsibilities

The purpose of the strategy set out in Section 2 will be achieved by:

- ♣ Clearly defining the respective roles of Scheme Employers and the Administering Authority
- ♣ Setting clear and achievable standards of service levels for the functions carried out by Scheme Employers and the Administering Authority
- ♣ Setting out clear procedural guidance for the secure and effective exchange of information between Scheme Employers and the Administering Authority
- ♣ Monitoring service delivery, identifying poor performance and establishing a platform for the provision of support to improve performance where required.

- ♣ Continuous development of resources via the use of digital technology and staff training for both the Fund and its employers
- ♣ Applying charges where an employer consistently fails to meet deadlines to ensure the resulting additional administrative strain is not a burden on all employers.

3.1 The Employer's Roles and Responsibilities

The primary responsibilities for the employer are to:

- ♣ Communicate the entitlement to benefit from the LGPS to all eligible staff who can join the COWPF.
- ♣ Communicate to new members of the Fund the Pension Portal address and how they can access information on their pension.
- ♣ Communicate to new members of the scheme that transfer requests must be made within 12 months of joining the Fund.
- ♣ Apply the scheme via the collection and payment of the correct levels of pension contributions.
- ♣ Report information and data to the COWPF as set out in this strategy.
- ♣ Determine and publish relevant employer discretions as required in the LGPS Regulations.

3.2 The Administering Authority's Roles and Responsibilities

The City of Westminster is an Administering Authority (AA) responsible for the provision of our own Local Government Pension Scheme Fund. The COWPF is invested for the benefit of all members as instructed by the COWPF Committee. The Pension Fund Committee has the support of internal AA Officers and qualified external advisors to ensure that the Fund is able to meet all future pension promises. The Pension Fund Committee is also supported by a separate Pension Board that has both employer and member representatives.

COWPF is responsible for ensuring that our appointed administration partner HPS is performing to our agreed contractual standards and is providing a reliable pension administration service to our members. Internal administration officers will support both HPS as our administrators and the funds employers to meet our high standards for members and ensure their expectations are met and exceeded where possible.

COWPF will ensure that any other third party engaged on behalf of the Fund is properly monitored to ensure our Fund remains strong.

The key responsibilities for the Administering Authority are to:

- ♣ Administer the LGPS in respect of all scheme members (Active, Deferred and Pensioner members) in accordance with this Strategy and in line with the LGPS and other regulatory requirements.
- ♣ Maintain and review the Fund's Statements, Policies and Reports and all other matters relating to the Governance of the scheme.
- ♣ Communicate and engage with employers on LGPS matters.
- ♣ Provide support/training to scheme employers.
- ♣ Maintain and develop an effective web presence for the benefit of members and scheme employers.

HPS have invested in an Employer Hub Portal which links into the pensions administration system. This portal empowers employers to conveniently submit data online, facilitating the review and update of their members' individual records and the prompt notification of employment-related changes to the COWPF.

Employers can submit various notifications and requests online. These include new starters, transitioning to the 50/50 scheme, updates to addresses, changes in personal circumstances, adjustments in work hours and breaks in service, leavers, opt-outs within a three-month period, and submission of ill health certificates.

COWPF expects all employers to sign up and use the Employer Hub. HPS offers regular training on various pensions subjects and in using the Employer Hub. Employers can request support from the Employer Pension Team pensions.employer@hants.gov.uk

A summary of the main roles and responsibilities of employers in the Fund are set out in Appendix A with the applicable PAS charge the fund can apply in each case. The summary is not intended to set out every employer responsibility or to override any employer responsibility as set out within the LGPS regulations or other statute.

Appendix B sets out the main summary of duties for the Administering Authority, defining the main functions, which enable the Pension Fund to deliver an efficient, accurate and high-quality pension service to scheme members.

4. Performance Monitoring

The strategy recognises that there is a shared responsibility for ensuring compliance with the LGPS regulations and the PAS.

COWPF will monitor employer performance across the following key areas:

- ♣ The submission of monthly data returns
- ♣ The payment of contributions and other payments due
- ♣ The number of queries, along with the rate and quality of responses
- ♣ The number of complaints received and IDRPs upheld against the employer and the COWPF where applicable.
- ♣ The annual return employer performance (A summary to Annual Return Employer Performance Benchmarking is set out in Appendix C)

The LGPS regulations grant pension funds the authority to recover administration costs incurred due to a scheme employer's underperformance from that employer. The COWPF has applied some PAS charges to employers following our move to HPS in November 2021 as we worked to remove a backlog of unprocessed leaver cases. The Fund has also applied PAS charges for the late submission of remittance and contribution data on a few occasions. The COWPF has centrally covered the administration costs of clearing administration backlogs to date and not recharged these directly to employers.

From April 2024 onwards any backlog of work that is directly related to any employer not fulfilling their duties and responsibilities as outlined in this PAS, will result in that employer specifically being PAS charged for the administration costs to deal with that backlog. The costs will be determined at the time of assessment of any backlog and advised to the employer at the time. This change is to ensure that fund employers who comply with the PAS are not contributing to the cost of dealing with any that do not.

If there were an administration backlog that was caused because of issues outside the control of an individual employer, the COWPF would cover those costs centrally.

COWPF, in partnership with our administration associate in HPS, will extend support to employers to fulfil our shared responsibilities to members. We appreciate and are open to feedback to improve services for both employers and members.

If you represent an employer struggling to meet the terms of this PAS, please contact us promptly so we can work together and avoid additional charges if we can resolve outstanding issues through mutual agreement between COWPF and the employer.

In cases of persistent employer failure to improve performance, we will take the following steps:

- ♣ The COWPF will engage with the employer to discuss areas of poor performance.
- ♣ An improvement plan with required changes and a timeline will be agreed upon if possible.
- ♣ If no improvement occurs within the agreed time frame, or if the employer fails to take action, a formal written notice will be issued, outlining identified issues and possible cost recovery.
- ♣ The Fund employer may be required to exit the COWPF for further accrual by their members. The COWPF would expect the employer to advise those members affected.
- ♣ Detailed calculations of losses or additional costs incurred in resolving poor performance will be provided.
- ♣ The COWPF may have to report the employer to The Pensions Regulator (TPR) for noncompliance with the TPR code. The COWPF will advise the employer if this action is being taken. The TPR may apply their own penalties separate to COWPF.

For more information about the work of The Pensions Regulator, you can visit the following link: <https://www.thepensionsregulator.gov.uk/en>

A schedule of charges is detailed in Appendix A.

5. Communication, Recourses and Available Support

The various channels of communication employed by the fund include:

1. The **City of Westminster Council Pension Fund** website is the main communication tool for both employers and scheme members.
 - ♣ **Employers** – a dedicated and secure employer section where employers can access procedure guides, information on courses run by the Fund. All employers are required to provide data through the UPM - Civica Employer Hub Portal.
 - ♣ **Scheme members** – access to up-to-date information about all aspects of the LGPS and the Member Self Service area where members can update personal details, review annual benefit statements, complete their own pensions estimates and access online tutorials.
 - ♣ **Contact Details** – Westminster City Council Retained Payroll and Pension contact information are available on the website, together with contact details for the Hymans Robertson Team, Investment and Pension Fund Committee and Pension Board.
2. **Scheme members** who have chosen to opt out of the Member Self Service will continue to receive postal communication. They will still be able to access up-to-date information about all aspects of the LGPS via our website.
3. **Employer newsletter** are issued to scheme members and all employing authorities and published on the COWPF website.
4. **Pension surgeries** may be arranged to support individuals or groups of individuals who need support with particular pension issues. Employers can contact the WCCCPF administration team to discuss the needs of members.
5. **Regular feedback** sent directly to employer representatives to provide notification of any scheme / administrative updates and developments.
6. **Employer workshops** to review scheme developments, and/or to resolve any training needs that employers may have.

For further information regarding our methods of communication, please see our Communications Policy which is located on our website.

6. Feedback and Review Process

COWPF is also accountable for its performance, and we welcome feedback from our Employers regarding the performance of the Fund against the standards in this administration strategy, as set out in Section 3. Comments should be sent to the Strategic Pension Lead Sarah Hay shay@westminster.gov.uk . Any feedback received will be incorporated into the quarterly reports provided to the Pension Board.

You should send any questions about this Pension Administration Strategy to the Strategic Pension Lead Sarah Hay.

Sarah Hay
Strategic Pension Lead
Westminster City Council
11th Floor
64 Victoria Street
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SW1E 6QP
E-mail: shay@westminster.gov.uk

Westminster City Council Pension Fund is not responsible for verifying the accuracy of any information provided by the employer for the purpose of calculating benefits under the provisions of the Local Government Pension Scheme. This responsibility rests with the employer.

Regulation 59 of the Local Government Pension Scheme (LGPS) Regulations 2013 is the regulation that allows COWPF to create this strategy.

Regulation 59 states that on creating or revising its strategy, the administering authority must consult with its employers.

The COWPF Pensions Committee approved this strategy on 7th March 2024.

It is effective from 1st April 2024 and we will keep it under review to ensure it remains up to date and meets the necessary regulatory requirements.

In preparing this pension administration strategy, we have consulted with our Fund employers and our third-party administrator. If we need to revise this strategy, we will notify our Fund employers and our third party administrator.

We will publish the current version of the strategy statement on our website at www.wccpensionfund.co.uk and will make paper copies available on request.

Appendix A	City of Westminster Pension Fund Employer Performance Targets and PAS Charges	
Administration Description	Performance Targets	Non-Compliance Charge
New Scheme Member		
Employer to send to the Administrating Authority the details of the new member.	Within 30 working days after the start of membership.	£100
Employers must enrol eligible staff into the LGPS when they reach their staging date or when members meet their eligible enrolment criteria	Advise COWPF of the new starter as per the standard fund process within 30 working days of the start of membership. Failure to comply with auto enrolment is a breach of the Pension Regulator code.	£100
Leavers		
Employer to send the Administrating Authority a completed leaver notification.	Within 30 working days after the end of membership. Except in retirement or death in service cases	£100
Refund contributions following opt out with less than 3 months scheme membership.	The employer's payroll should refund the member any LGPS contributions in the month the opt out is processed. The employer then has the standard 30 working days to update the fund of the leaver and provide a copy of the validated opt out election to the pensions administration team.	£100

Retirements and Death in Service		
Notification of retirement via online portal	No later than 10 working days after the member's final payroll has run.	£250
Ill Health Retirement notification notify the Fund via Ill Health Retirement (medical certificate) form or via online portal	No later than 10 working days after the member's final payroll has run.	£250
Ill-Health Retirement (Deferred members)	No later than 10 working days after the decision has been taken to grant ill health retirement.	£250
Death in Service	Provide an initial notification within 5 working days of the employer being informed of the death of the employee	No PAS charge determined.
Review payment of Tier 3 ill-health benefits	Within 3 months of being notified by the administrators to review.	No PAS charged determined but note failure to complete may result in the members pension being suspended until the review is complete.
Flexible retirement notification	No later than 10 working days after the member's final payroll has run accompanied by confirmation of the number of hours per week to be worked in the continuing job role.	£250

Contracting Out of Services		
Notify COWPF of an Outsourcing of staff in the LGPS	COWPF should be advised of any contracting out prior to the award of any contract. The Fund requires notification no later than the day of transfer to a new employer.	PAS charge no less than £250 from the 1 st of April 2024. The COWPF reserves an entitlement to increase that charge should the transfer involve more than ten people or there be a delay in advising the fund exceeding three months.
Contributions and Other Payments Due		
Apply the applicable employee contribution rate to eligible members salary as determined by the LGPS Regulations and review at least annually and whenever their salary rate is adjusted.	Payment date - payment must credit the pension fund bank account on or before 19th of the month following the month to which deductions relate (or previous working day if 19th is a weekend or public holiday)	£100 for receipt of late payment for each monthly payment. COWPF may seek recovery of under deducted LGPS employee contributions from an employer if the fund identifies an issue. The Fund may in exceptional circumstances PAS fine additionally employers to recover COWPF officer time to review complex contribution issues.

<p>Remittances and schedules</p>	<p>Remittances - a copy of the monthly remittance and schedule must be sent 3 working days prior to the date that payments are credited to the fund, to the following email addresses: WCCIMSupport@westminster.gov.uk and PensionFund@westminster.gov.uk</p>	<p>£100 per late remittance and £100 per late schedule. The COWPF may also PAS charge an additional £500 if there are three or more months in the prior 12 months where either payment, remittance or Schedule are late or inaccurate.</p>
<p>AVC</p>	<p>AVCs payments - should be paid monthly by 19th of the following month of deduction. AVC payments should be made directly to the COWPF AVC provider AEGON</p>	<p>Please note that if payment is made after the 19th day of the month following deduction, then the Fund may charge a PAS charge of £100 per late payment. In addition, the Fund expects the employer to meet any lost return as a result of late payment and credit that to the members AVC pot. Also in addition, meet the costs from the AVC provider for calculating those additional returns and pay the provider invoice.</p>
<p>APC, ARC, Added Year Contributions</p>	<p>Deductions should be applied as applicable in the LGPS regulations and notified to the employer by the member or COWPF.</p>	<p>Payment should be received with the next contribution payment as above received by the 19th day of the month following deduction.</p>
<p>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, or the employer 'switches on' the 85 year rule, and a financial strain cost arises</p>	<p>Within 30 days of date of invoice from the Fund</p>	<p>The Fund will PAS Charge an additional £250 per invoice received more than 60 days after the deadline.</p>

General Information		
Move members between the main scheme and the 50 50 scheme.	The employer is expected to move members into the relevant section of the scheme following receipt of the relevant certified election form. The administrator must then be advised within working 30 days of that change with a copy of the relevant election form.	No PAS charge determined. Compliance will help ensure data quality.
Methods of data exchange	All employers should use the Employer Hub transfer system, UPM, to submit data every month. All forms should be submitted using a secure method of data transfer via online portal. Additional information can also be supplied by email. However, employers must consider data protection when sending information by email and take appropriate steps to ensure data breaches do not occur.	No PAS charge determined but note employers will need to ensure that the administrator does have relevant data sent via other methods or PAS charges could be applied to missing data.
Control of System Access	Each employer must provide COWPF and our admin with a completed employer contact form. That form will provide and administration contact or contacts for day-to-day administration queries. A nominated payroll contact who will provide the authorised payroll users list and a finance contact responsible for the submission of monthly postings and coordination of the exception's reports. The employer or relevant representative must advise the administration team within 5 working days that a nominated contact who would have access to the employer hub has left the employer. This is to help maintain correct control of the system.	PAS Charge £100 if notified after 5 working days.

<p>Additional responsibilities (optional) of those using an external payroll provider.</p>	<p>Any COWPF Employer that moves or outsources their payroll provider must advise the administration team of the change of payroll at the earliest opportunity and no later than the day prior to the change of payroll service. The employers existing and new payroll providers will be expected to provide relevant data to ensure that the fund can account for all members.</p>	<p>PAS fine of £250 if advised of the transfer after the move to a new payroll provider. The existing payroll provider has 30 working days from the end of their last payroll period to provide their data and the new payroll provider has 30 working days from the last day of their first payroll period to provide the administrator with relevant data to complete the reconciliation exercise. Failure to comply would result in a PAS fine of £100 per member up to a maximum £500.</p>
<p>End of Year Data Return</p>	<p>The deadline for submitting the end of year return is the 30th of April every year or the last working day in April prior to the 30th</p>	<p>PAS fine of £100 if received after the deadline but before the 31st of May. PAS fine of £250 if received from the 1st of June.</p>
<p>Employer Performance Scoring Data Quality</p>	<p>Less than 2% of queries on active membership following the annual return processing with responses received to any queries raised by our administrators within 30 working days. More information on the Annual Performance Scoring is included in Appendix C.</p>	<p>PAS fine of £1000 is being introduced from the 1st of April 2024 for any employer that has had reported to them poor data quality for three years in a row going back to the performance year 22/23 moving forward. Poor data quality is defined as having queries on 5% of active membership or more and being slow to respond to administrator queries.</p>

Governance		
Employers must nominate an adjudicator to deal with appeals at stage one of the IDRPs where the dispute is against a decision the employer has made or is responsible for making. Employers are responsible for providing details of the IDRPs and the adjudicator in writing to members when informing them of decisions they have made	Within 20 days of change or becoming a scheme employer.	No PAS fine determined.
The employer is responsible for exercising the discretionary powers given to employers by the regulations. The employer is also responsible for compiling, reviewing and publishing its policy in respect of the key discretions as required by the regulations to its employees.	A copy of the policy document is to be submitted to the Fund within 20 days of the change in policy	No PAS fine determined.
Distribute any information provided by the Fund to scheme members/potential scheme members (e.g. scheme benefits or benefit statement production)	In a timely manner as required	No PAS fine determined.

Appendix B	City of Westminster Pension Fund Administering Authority Roles and Responsibilities	
Administration Description	Performance Targets	KPI Target
New Scheme Member		
Member to be set up on the UPM Pensions software	Within 15 days after the receipt of completed information from the employer	100%
Leavers		
Retirements to be Processed from both active and deferred status.	Within 15 days after receipt of all relevant information. This includes employer leaver information if retiring from active status at a fund employer.	100%
This includes all types of retirement, ill health, voluntary, redundancy and flexible retirement.	Members also need to complete the retirement declaration form which can be located on the member portal.	100%
Deferred Benefits	30 days from receipt of all relevant information from the employer.	100%

Reviews, Estimates and Transfers		
Tier 3 Ill Health Review	Reminder to be sent to the employer three months before review is due. Upon receipt of notification to suspend a tier 3 pension enact in the next payroll period. Upon notification to amend a Tier 3 ill health retirement to a tier 2, enact within 15 days as per the original retirement. Suspend pension if no response from employer three months after the review date.	100%
Employer Estimate Requests	20 days from receipt of all relevant information from the employer. Employers can request 2 estimates per individual in any 12-month period within our agreed costs. Additional estimates must be paid for and we ask employers to only request multiple estimates if there is a significant change in leaving date or member pay.	100%
Member Estimate Requests	20 days from receipt of all relevant information from the employer/ member. Most members can run accurate retirement estimates by accessing the facility on the member portal which is user friendly and the Annual Benefit Statement (ABS) available on the portal will provide an estimate of pension each year. Members can request 1 estimate per year by completing a request form available from our administrators Hampshire Pension Services (HPS). If active members of staff the employer will need to confirm the members pay before submitting to HPS to complete and return.	100%
Cash Equivalent Transfer Value (CETV) Request	CETV requests within 20 days although these could soon be run on the member portal. Where the member is still actively contributing to the scheme, the employer will need to confirm the salary details. A CETV specifically for divorce proceedings has to be run by the pensions administration team.	100%

Death in Service	Provide an initial notification to the next of kin within 5 working days of the employer advising the administrator of the death and providing the relevant final pay and contact information. Payment of any dependent pension benefits due will be processed within 5 days of receipt of relevant forms with payment in the next available pension payroll run.	100%
Death from deferred status	Initial contact will be made within 5 days of notification with the next of kin or appointed representative if known to the Fund.	100%
Death of a member in receipt of pension.	Initial contact will be made within 5 days of notification with the next of kin or appointed representative if known to the Fund.	100%
Payments		
Payment of Pension Lump Sums	Pension Lump Sums will be processed for payment within the 15 days retirement processing deadline with payment processing via BACS to normally take no more than 5 working days.	100%
Contribution Requirements	The COWPF will hold a pension fund valuation every three years to determine each employer's contribution rate. The Fund will consult with employers on their rate. The Fund aims to be more than 100% funded for all employers.	
Other Payments	The COWPF will pay other payments due on behalf of members within the agreed timescale for that payment type. This includes payments to HMRC.	100%

Contracts and Governance		
Appoint and monitor third party Contactors	The COWPF will appoint and monitor the performance off all relevant third-party contractors operating on behalf of the Fund. This includes the administrator Hampshire Pension Services and the Pension Fund Auditors	100%
Data Quality	The COWPF will constantly measure and monitor the quality of members data to ensure the fund is able to provide accurate information to members and pay members benefits as per our agreed timescales when due. Where an area for improvement is identified the Fund will take all reasonable steps to improve that data with consideration to the benefit from improvement and the cost.	
Reports to the The Pension Regulator and other Returns	The COWPF will complete any statutory return on behalf of the Fund. This includes the Pension Regulator	
Discretions	Will publish a policy outline its Administering Authority Discretions COWPF will maintain links to these discretions on WCC website https://www.wccpensionfund.co.uk	
Policies	Arrange for the reports and policies to be provided to all employers requiring such a information. COWPF regularly review the Fund's policies: <ul style="list-style-type: none"> • Retention Policy and Full Privacy Notice • Communications Policy • Annual Report • Statement of Investment Principles COWPF will maintain links to these policies on WCC website https://www.wccpensionfund.co.uk	

Security		
Cyber and Data security	Will be working with our administration partners and our Fund employers to ensure maximum security for our members data. This includes regular cyber security updates on the pension software and monitoring access via the employer hub.	
Employer and Member Support		
HPS Telephone Helpline	HPS will provide a helpline open between 9 am and 4.30pm Monday to Friday Telephone: 01962 845588	
HPS Email	E - mail: pensions.employer@hants.gov.uk Employers have a dedicated employer team to help them with any pension issue related to the LGPS	
Regular Training	Regular Training is offered by HPS to Westminster Pension Fund employers on a variety of areas. This training will be promoted throughout the year to employers but can be located per this link https://www.hants.gov.uk/hampshire-services/pensions/local-government/employers/training	

Appendix C

Employer Performance Benchmarking Guide

When we transitioned our pension administration service to Hampshire Pension Services (HPS) in November 2021, it was agreed to incorporate employer performance benchmarking into the annual returns process.

Hampshire Pension Services assesses Scheme Employers for timeliness, financial control, and data quality.

Timeliness - The deadline for submitting a complete and accurate annual return to Hampshire Pension Services is April 30th.

Financial control - The pension contributions from both employees and employers, as outlined in the annual return, should align with the contributions received by the COWPF, which are reported during the monthly reconciliation process. In the event of genuine reasons for any discrepancies, these reasons should be documented in the return to facilitate the reconciliation of contributions.

Data quality - The data provided in the annual return should align with the member records maintained by Hampshire Pension Services for the respective employer. This includes details regarding new starters, leavers, and any modifications to the records.

The benchmarking scores are provided in the following section:

	Timeliness	Financial control	Data quality
No issue	Return received before 30 April	No reconciliation issues	No or very minor data quality issues (below 2% of active membership)
Minor concern	Return received between 1 May and 31 May	Minor reconciliation issues and quickly resolved	Some data quality issues (between 2 and 5% of active membership)
Significant Concern	Return received more than a month late	Major reconciliation issues and/or slow/failed to respond	Major data quality issues (more than 5 queries or 5% of membership, whichever is higher) and/or slow/failed to respond

In our continuous commitment to upholding the utmost data quality standards for our COWPF members, we conduct an evaluation of Scheme Employer performance as a part of the annual return process.

For the financial year 2022-2023, we initiated the distribution of our first round of employer performance letters. During the previous financial year 2021-2022, COWPF assessed employer and payroll provider data and responses. However, at that time, we refrained from sending letters to employers or schools as our focus was on resolving historical queries and ensuring that employers and payroll providers understood the various requirements inherited by Hampshire Pension Services from the previous administrator.

For the financial year 2023-2024, we will be process of dispatching our second round of employer performance letters.

Looking ahead to the financial year 2024-2025, we will be introducing a **£1000** charge to employers for insufficient data quality, provided they have experienced issues for three years in a row. This fee will serve to offset some of the costs that the COWPF will have incurred to help deal with the data issues in order to maintain the data quality for the fund members involved.

As part of these initiatives, all scheme employers rated "red" in one or more areas during annual return benchmarking will receive a letter, requesting a review of their processes to improve future performance.

Employers with "red" ratings for data quality will undergo a data validation exercise to update information and ensure timely notifications for starters and leavers from the prior 1st of April. Employers who have failing data quality are required to complete this exercise.

Hampshire Pension Services will collaborate with payroll providers and employers to enhance their understanding of returns and address identified reporting issues.

Pensions Matters will raise employer awareness about the importance of notifying opt-outs and scheme section changes, particularly during re-enrolment.

Additionally, employer training for annual returns will be reviewed to highlight key checks before submission, and awareness and promotion of using Employer Forms and document uploads in the Employer Hub will be encouraged. Consideration will be given to potential charges for scheme employers who fail to provide necessary notifications, changes, or respond to queries.