

Pensions Shared Service

Camden • Merton • Richmond
Waltham Forest • Wandsworth

Pensions Administration Strategy



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1. Introduction

This is the Pensions Administration Strategy (PAS) for Camden Pension Fund, Merton Pension Fund, Waltham Forest Pension Fund and Wandsworth Pension Fund relating to the Local Government Pension Scheme (LGPS). Camden Council, Merton Council, Waltham Forest Council and Wandsworth Council are the Administering Authority (also known as scheme manager) for their respective Fund. The Funds' pension administration service is provided by the Pensions Shared Service as part of a shared administration service.

In this PAS, the following terms will be used:

- **the Fund** which deals with LGPS investments, actuarial valuation processes and collection of contributions and is based at the respective Town Halls; and
- **the Pensions Shared Service** which deals with all other LGPS pensions administration on the Funds' behalf and is based at Wandsworth Town Hall; and
- **Employers** who participate in the LGPS as a scheduled body¹ or as a designating body, such as a town or parish council, or as a non-local government organisation (an admission body). In this PAS the term "Employers" also includes any other body or school that uses outsourced payroll services.

The LGPS is a statutory pension scheme and governed by regulations – available here: <http://lgpsregs.org/schemeregs/index.php> The current regulations governing administration are the LGPS Regulations 2013 (As Amended). In discharging their roles and responsibilities under these regulations, the Pensions Shared Service and Employers are also required to comply with any overriding legislation and follow any regulatory guidance or Code of Practice issued by The Pension Regulator regarding data quality, completeness and timeliness.

Any questions relating to this PAS should be directed to the Employers Team email address: pssemployers@richmondandwandsworth.gov.uk

2. Legislative Background

The Pensions Shared Service and all Employers must have regard to this PAS when carrying out their Scheme functions. Regulation 59 of the LGPS Regulations 2013 provides authority for the Pensions Shared Service to create

¹ Academies, County Councils, London Boroughs, Post-92 Universities and Further Education Colleges Participate in the LGPS as 'Scheduled Bodies' as listed in Schedule 2 of the LGPS regulations

a PAS which sets out requirements to facilitate best practice and efficient customer service in respect of the following:

- The levels of performance which the Pensions Shared Service and Employers are expected to achieve in carrying out their Scheme functions;
- Ensuring the Pensions Shared Service and Employers comply with statutory requirements in respect of those functions;
- Improving the communication between the Pensions Shared Service and Employers in order to carry out those functions.

This PAS includes a schedule of additional administration costs, in Appendix 3, in accordance with Regulation 70 of the LGPS Regulations 2013 which provides scope for pension funds to recover costs where, in its opinion, additional costs are being incurred due to an Employer's level of performance.

Levels of performance achieved, by both Pensions Shared Service and Scheme Employer, are reported as part of the Pension Administration Report at each Fund's Pensions Committee and Local Pension Board meeting and documented in each Fund's Annual Report and Accounts.

3. Aim

The aim of this PAS is for the Pensions Shared Service and Employers to work together to provide a high quality service to our members delivered through efficient working practices.

The efficient delivery of the benefits of the scheme is reliant upon effective administrative procedures being in place between the Pensions Shared Service and Employers.

The PAS should help ensure that the Pensions Shared Service and Employers understand their respective roles and responsibilities under the LGPS Regulations to deliver these administrative procedures.

The PAS sets out the expected levels of performance of the Pensions Shared Service and Employers. The PAS provides details about the monitoring of performance levels and the action(s) that could be taken where standards are not met by Employers and/or when persistent non-compliance occurs.

The PAS is implemented from 1 June 2020 following a period of consultation with the Pensions Shared Service's Employers. The Pensions Shared Service will continue to keep the PAS under review and update as required to reflect changes in scheme regulations and our working practices. The Local Pension Boards of the respective Funds, in their role of ensuring efficient administration and governance will also monitor the operation of the PAS.

4. Development of the Pensions Shared Service

i-Connect

The key to delivering efficiencies in our pensions administration is the full implementation of i-Connect which allows for the automation of transfer of member data from employers' payroll systems to the pensions administration system on a monthly basis, thus reducing the need for manual inputting; reducing the workload of end-of-year reconciliation and ensuring the maintenance of a stable and accurate membership database.

i-Connect brings many benefits for Employers including maintaining data in line with statutory rules thus avoiding the risk of being fined by the Pensions Regulator for breaching legislative time limits and other requirements. Accurate member records have a beneficial impact on employer pension contribution rates and a better service for members.

This PAS sets out a deadline, of 31 March 2021, for up to date monthly digital transfer of data from all Employers via i-Connect.

Member Self Service

The Pensions Shared Service is promoting its secure on-line portal which allows members, (active, deferred or pensioner) to view pension records and scheme documents.

The expectation is that this online portal will become the default method of Pensions Shared Service communication with members and improvement in customer service and information exchange is expected. Employers are expected to encourage their employees participating in the LGPS to register for this service.

If, by April 2021, an Employer has not achieved regular and timely submissions of i-Connect then administration recharges up to £20,000 (depending on size of Employer) will be levied on that Employer by the Pensions Shared Service. A table of potential recharges will be issued to each Employer by 30 September 2020.

5. Roles and Responsibilities

The Administering Authority's Roles and Responsibilities

The key responsibilities for the respective administering authorities (most of which are discharged by the Pensions Shared Service under the shared administration agreement) are to:

- administer the LGPS in respect of all scheme members (Active, Deferred and Pensioner members) in accordance with legislation and as set out in this PAS;
- maintain and review the Pensions Shared Service's Statements, Policies and Reports and all other matters relating to the governance of the LGPS;
- communicate and engage with Employers on LGPS matters;
- provide support/training to Employers; and
- maintain and develop an effective web presence for the benefit of members and Employers.

A guide to the administering authority's main roles and responsibilities are set out in **Appendix 2**. The list of functions, which concentrates on the main roles, rather than being an exhaustive list, sets out the key areas which involve interaction and liaison with Employers and/or scheme members.

The Employer's Roles and Responsibilities

The key responsibilities for the Employer are to:

- Ensure that LGPS information is communicated to eligible staff and participating members of the LGPS;
- Apply the LGPS via the collection and payment of the correct levels of pension contributions;
- Report information and data to the Pensions Shared Service as set out in this PAS or on request.

A guide to the employer's roles and responsibilities is set out in **Appendix 1**. The guide includes a summary of duties which defines the main functions of the employer role which, in turn, enables the Pensions Shared Service to deliver an efficient, accurate and high quality pension service to members.

Each Employer will designate a named individual to act as the main point of contact (**nominated representative(s)**) with regard to any aspect of administering the LGPS. A form will be sent to each Employer requesting that information. The key responsibilities for the nominated representative will be to:

- to act as a conduit for communications to appropriate staff within the Employer, for example, Human Resources, Payroll teams, Directors of Finance;
- to ensure that standards and levels of service are maintained;
- to ensure that details of all nominated representatives and authorised signatories are correct and to notify the Pensions Shared Service of any changes immediately;

- to arrange distribution of communications literature as and when required;
- to assure data quality and ensure the timely submission of data to the Pensions Shared Service;
- to assist and liaise with the Pensions Shared Service on promotional activities; and
- to ensure payments due to the Pensions Shared Service are made in accordance with legislation and as set out in this PAS.

Please let the Pensions Shared Service know immediately if a nominated representative leaves your organisation.

6 Performance Reporting

The performance of each Employer in providing all necessary data required by legislation and as set out in this PAS will be monitored.

In dealing with poor performance the Pensions Shared Service will:

- write to the Employer setting out the area(s) of poor performance; meet with the Employer, to discuss area(s) of poor performance and how these can be addressed;
- issue formal written notice, where no improvement is demonstrated by the Employer or where there has been a failure to take agreed action by the Employer, in accordance with regulation 70 of the LGPS Regulations 2013 the written notice will include:
 - the reasons for issuing the notice
 - the amount that the Employer has to pay
 - the relevant provisions of the PAS;
- issue an invoice for cost recovery;
- report any invoice for the cost of recovery to the respective Local Pension Board at the next available meeting and which may form part of the administration report in the Fund's published Annual Report.

Each Fund's Local Pension Board will monitor regularly the key performance measures. The Pensions Shared Service will seek, at the earliest opportunity, to work closely with Employers in identifying areas of poor performance, provide the necessary training and development to put in place appropriate processes to improve the level of service into the future. In the event of continued poor performance and a lack of any evidence of measures being taken to achieve improvement by an Employer the Pensions Shared Service will seek to recover any additional costs arising. A summary of the additional costs that the Pensions Shared Service will seek to recover is provided in **Appendix 3**. In addition, any third party costs or regulatory fines incurred by the Pensions Shared Service as a consequence of administrative failures or poor performance will be recovered from the respective Employer. These may include fines imposed by the Courts or the Pensions Ombudsman and

additional charges in respect of actuarial fees, legal fees, third party computer charges and additional printing and distribution costs.

The Pensions Shared Service will recover additional costs incurred in the administration of the scheme as a direct result of the poor performance of any Employer (including the Administering Authority). With the objective of ensuring fairness across employers in avoiding Employers paying more to cover the higher administration costs incurred by others. Where an employer fails to pay any amount due to the Pensions Shared Service (other than monthly contributions) within 30 days, interest for late payment may be charged accordingly. This includes charges and recharges levied under this PAS.

Feedback from Employers

The Pensions Shared Service will monitor its performance against the standards in this PAS, as set out in Appendix 2, from the event date (e.g. date of leaving/retirement or the date that all necessary data has been received/is available) to the date of the completion of the task.

Employers who wish to provide feedback on the performance of the Pensions Shared Service against the standards in this PAS should send their comments to: pssemployers@richmondandwandsworth.gov.uk

Please begin the subject line of your email with "Performance". Any feedback received will be responded to and incorporated into the reports provided by the Pensions Shared Service to the Local Pension Boards.

Audit

The Pensions Shared Service will be subject to regular audits of its processes and internal controls. The Pensions Shared Service and Employers will be expected to fully comply with any requests for information from both internal and appointed external auditors. Any subsequent recommendations made will be considered by the Pensions Shared Service and where appropriate duly implemented.

General Data Protection Regulations (GDPR)

In May 2018 the General Data Protection Regulation (GDPR) came into force. The regulation changed the way organisations process and handle data, with the key aim of giving greater protection and rights to individuals.

In addition, organisations have an obligation for better data management and a new regime of fines will be introduced for use when an organisation is found to be in breach of the GDPR. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk

Employers are under a statutory obligation, as detailed in Regulation 80 of the LGPS Regulations 2013, to provide certain personal data relating to their

Members to their pension administrators, including (but not exhaustively): the Pay Reference Number, Post Number, National Insurance Number, Surname, Forenames (or Initials), Title, Gender, Date of Birth, Address, Postcode, Date Pensionable Service Started, Marital Status, Hours, Weeks, Pay, Basic Employee and Employer Contributions Paid, Additional Employee and Employer Contributions Paid, Date Left Pensionable Service, Reason Left Pensionable Service and Periods of Absence from Pensionable Service.

The Pensions Shared Service along with each Fund has published a privacy notice in line with the GDPR requirements, setting out why certain data is held; the reason for processing the data; who it shares the data with and how long the data will be retained. Within the notice, members are also provided with additional information about their rights under the legislation.

The Pensions Shared Service on behalf of each Fund has issued to Employers a Memorandum of Understanding, which confirms the joint roles and responsibilities with regards to the sharing of information that enables the Pensions Shared Service to provide an efficient and effective service to scheme members and stakeholders.

These privacy notices and Memorandums of Understanding are available on our website **<https://pensionssharedservice.org.uk/gdpr-and-your-pension/>**

Employers should inform all new employees that their personal data is shared with the Fund and the Pensions Shared Service, in order for both to meet its statutory responsibility of administering the Local Government Pension Scheme.

Appendix 1 - The Employer's Roles and Responsibilities	
This table sets out Employers' Roles and Responsibilities:	
Function/Task	Performance Target
General information	
Confirm nominated representative(s) to Pensions Shared Service	By 15 April each year (to be submitted via email to pssemployers@richmondandwandsworth.gov.uk) or within 5 working days of a change in personnel.
Appoint a person (the adjudicator) to consider disputes under stage 1 of the pension internal dispute resolution process (IDRP) and provide full up to date contact details to the Pensions Shared Service	Notify the Pensions Shared Service within 30 days of becoming a scheme employer or following the resignation of the current adjudicator
Formulate, publish and keep under review policies in relation to all areas where the Employer may exercise a discretion within the LGPS	A copy of the policy document is to be submitted to the Pensions Shared Service by 30 April 2020 and thereafter within one month of any change in policy
Respond to queries from the Pensions Shared Service	Within 10 working days from receipt of enquiry unless stated otherwise
New Starters	
To ensure that pensions information is included as part of any new employment induction process, including in contracts of employment and appointment letters including signposting to LGPS guide on the PSS website: pensionssharedservice.org.uk	As part of standard contract/appointment templates
Ensure that the correct contribution percentage and banding for member's LGPS contributions is applied to their payroll record and notify the member of initial contribution rate and any subsequent changes. The notification must also notify the employee of the right to appeal, including the processes and timescales involved.	From date of commencement or joining the scheme.
Notify the Pensions Shared Service of new scheme joiners via the monthly i-Connect submission	Within 1 month of member's entry into the scheme via contractual enrolment, auto-enrolment, re-enrolment date or election to join.
Where the member has more than one employment with the same Employer, each membership shall be maintained and reported upon separately (via i-Connect)	From date of commencement or joining the LGPS or starting or ceasing additional employments.
Advise Pensions Shared Service of any opt outs that take place within first three months (when contributions are refunded through payroll)	As part of next i-Connect submission following receipt of the opting out notification
Changes in Circumstances	
Provide the Pensions Shared Service with the following member information: new joiners	To ensure that the Pensions Shared Service is informed of any relevant changes in the

• changes in member's circumstances which may impact Pensions Shared Service benefits (eg, movement in and out of the 50/50 scheme, marital or civil partnership status, maternity, paternity, career break, etc.) • employee and employer contributions and earnings • hours Forms and guidance can be obtained from our website Pensionssharedservice.org.uk	circumstances of members via i-Connect within four weeks of the event
Ensure members are notified of the option to pay Additional Pension Contributions following applicable unpaid absences.	Within 2 weeks of the return to work
In view of potential changes to the LGPS due to the "McCloud judgement", we ask Employers to keep service records for all members (including leavers) from 1 April 2014: The service details should include: • Marital Status • Contractual Hours • Remuneration changes • Contribution Rate • Employee Number and/or Post Number • Absence: Maternity, Paternity and Adoption and Unpaid leave of absence and Industrial Action Each employer must ensure that this information is available to the Pensions Shared Service, if required.	As part of Employer data retention policy
Contributions	
Remit employer and employee contributions to the Pension Fund Bank Accounts – monitored by the Fund	By 19th of the following month following deduction
Implement changes to employer contribution rates as the instructed by the Fund from the date specified by the Fund's actuary	In line with the Rates Adjustment Certificate issued by the Fund's actuary, following each triennial valuation or other relevant event as notified in writing
Arrange for the deduction of AVCs and payment over to the AVC provider(s) and then schedule to be sent to the Pensions Shared Service	Payment by 19th of the following month following deduction
Make additional fund payments in relation to early payment of benefits from ill-health, flexible retirement, redundancy or business efficiency retirement or where a member receives benefits early with Employer's consent and a funding strain cost arises	Within 30 days of receipt of invoice from the Fund

Monthly i-Connect Returns	
To provide a monthly return in accordance with the Pensions Shared Service specification that reconciles the employee, employer and any additional contributions paid to the Fund.	Via the i-Connect submission no later than the 19th of the month following that in which the contributions were deducted.
To ensure optimum accuracy of monthly i-Connect files received.	Less than 5% of the active member count as at 1 April to error on import into the pension administration system
The rectification of an accurate monthly data file where it has been necessary to return the file due to data inaccuracies	Within 15 days of receipt of file.
Annual Data	
To ensure the Pensions Shared Service receives accurate year to date information to 31 March through the month twelve i-Connect data submission. The Employer is required to forward to the Pensions Shared Service a statement [RecForm] balancing the amounts paid during the year with the total amounts submitted via i-Connect for the year and to include leavers.	No later than 15 April following the relevant year end
Members Leaving Employment Before Retirement (Early Leavers)	
To notify the PSS of the member's leaving date and reason for cessation of membership and all other relevant information via the Leavers Form. To ensure that all i-Connect submissions are up to date.	Within 20 days of leaving date. The leaver event is also to be reported via the i-Connect submission by the 19th of the following month. The i-Connect submission must clearly state the reason for leaving.
Death in Service and Terminal Illness	
To inform the Pensions Shared Service immediately of the death of a member via the Leavers Form, or when a member is suffering from a potentially terminal illness and to provide details of the next of kin.	Within 1 working day of contact from next of kin.
Actual Retirement	
To submit the appropriate leavers form to the Pensions Shared Service.	At least one month before retirement where possible but in all cases no later than 15 working days after retirement date.
Ill Health Retirement	
To determine based on medical evidence and the advice of one of the Administering Authorities approved Independent Medical Registered Practitioners (IMRP) whether an ill health award is to be made and determine which tier 1, 2 or 3.	To submit the appropriate form to the Pensions Shared Service at least one month before retirement where possible but in all cases no later than 15 working days after retirement date.
To keep a record of all Tier 3 ill health retirements, particularly in regard to the 18	As soon as a decision is made.

month review of their scope for gainful employment and any subsequent appointment with an IMRP for a further medical certificate. To inform the Pensions Shared Service if and when the pension should cease.	
Before making any decisions, managers and HR involved in managing a member's sickness absence should take account of the "Statutory Guidance on the Application of the LGPS III Health Retirement Regulations" available here https://www.lgpsregs.org/schemeregs/lgpsregs2013.php Additionally, refer to the Pensions Ombudsman's guidance on ill-health retirements available here: https://pensionssharedservice.org.uk/media/1127/pensions_ombudsman_ill_health_guidance.pdf	Before any decision on entitlement to ill health retirement benefits is made
Contracting out of services and functions	
Notify the Pensions Shared Service of the contracting out of services which will involve a TUPE transfer of staff to another organisation	Inform the Pensions Shared Service within five working days of the decision to contract out a service or function.
Ensure that bidders have access to relevant guidance including but not limited to the PLSA guidance "Navigating entry into the LGPS: For Local Government Contractors" available from the Pensions and Lifetime Savings Association website: www.plsa.co.uk	At the point of decision to contract out.
Change of payroll provider	
To confirm the decision to change to a new payroll provider along with the contact details of the new provider	As soon as possible and no later than 6 weeks prior to the transfer of duties and functions.
Ensure that a new payroll contract requires the provider to supply data via i-Connect. Ensure that all i-Connect submissions up to the transfer of responsibilities are made by the outgoing provider in accordance with the PAS. Ensure that the new supplier provides payroll references (specific to post) to the Pensions Shared Service	As soon as possible but no later than 20 working days before the first i-Connect submission.

Appendix 2 – The Administering Authority’s Roles and Responsibilities	
This table sets out the Administering Authority’s roles and responsibilities (most of which are discharged by the Pensions Shared Service under the shared administration agreement)	
Function/Task (carried out by Pensions Shared Service unless stated otherwise)	Performance Target
Governance	
Regularly review the PAS and consult with all scheme employers	Triennially review the PAS and in addition review it following any material changes in service delivery or regulations relating to the PAS and consult with all Employers on any changes
The Funds will review their respective Funding Strategy Statements at each valuation (or material event), following consultation with Employers and their Fund Actuary	Publish by 31 March following the valuation date, or as required
Review the respective Fund’s Communications Policy	Annually review and publish within 30 days of any revision to the policy being agreed by the respective Pension Fund Committees
Review the Fund’s Governance and Compliance Statement	Annually review and publish within 30 days of any revision to the policy being agreed by the respective Pension Fund Committees
The Fund should formulate and publish policies in relation to all areas where the Administering Authority may exercise a discretion within the LGPS	Annually review and publish within 30 days of any revision to the policy being agreed by the respective Pension Fund Committees
Notify the Employer of issues relating to the Employer’s unsatisfactory performance	If no response to the Pensions Shared Service’s request for action is received within 10 days; second request marked “escalation” to be issued; if no response within 10 days matter referred for cost recovery
Notify the Employer in writing of decision to recover additional costs associated with the Employer’s unsatisfactory performance	After 10 working days of second request for action and continued failure to improve performance as requested
Member Information/Data Quality and General Administration	
Provide support for Employers through a dedicated page on website; quarterly newsletter; forums; quarterly meetings; quarterly training sessions and ad hoc bulletins and alerts	Information given quarterly to nominated representative
Notify Employers and members of changes to LGPS regulations	Within 90 days of regulatory change
Produce Annual Benefit Statements (ABS) to active and deferred Scheme Members as at 31 March each year	By 31 August following end of year
Produce and issue Pension Saving Statements (PSS) to members who have exceeded their annual allowance	By 6 October following end of year (subject to receipt of all relevant information from the Employer)

Key Performance Indicators	
Issue and keep up to date links to web-based Employer guides	Within 30 days of any revision
To accurately create member records on the pensions administration system following notification from an employer of a new entrant to the LGPS.	Within 40 days of the i-Connect notification
The Pensions Shared Service will contact all new members, providing them with an activation key for 'Member Self Service' The Pensions Shared Service will respond to member requests for an activation key.	Within 30 days of the i-Connect notification of a new starter / member's request
Initial letter/acknowledgement of death of active/deferred/pensioner member	Within 5 days of notification
Deaths – Letter notifying amount of dependant's benefit	Within 10 days of completed forms and documents
Retirements – Letter notifying estimate of retirement benefits	Within 15 days of request (where practicable the Pensions Shared Service will deliver immediate retirement estimates to members via Member Self Service)
Retirements – Letter notifying actual retirement benefits	Within 15 days of (the latest of) the member's retirement date or the Pensions Shared Service receiving all completed forms/documents
Retirements – process and pay lump sum retirement grant	Within 15 days of (the latest of) either receipt completed forms and documents or the retirement date
Deferment – Calculate and notify deferred benefits	Within 30 days of date of Employer Notification
Transfer out – Letter detailing transfer out quote	Within 10 days of completed request form
Transfer in – Letter detailing transfer in quote	Within 10 days of receiving transfer details from sending scheme
Refund – Process and pay a refund	Within 10 days of (latest of) either completed forms/ documents or payable date
Divorce quote – Letter detailing cash equivalent value and other benefits	Within 45 days of request
Divorce Settlement – Letter detailing implementation of cash equivalent value and application of pension sharing order	Within 15 days of receipt of pension sharing order
Provide an acknowledgement and answer to scheme members/Employers/personal representatives/dependents and other authorised persons	Answer non-complex enquiries within 5 working days from receipt and for complex enquiries: acknowledge within 5 working days of receipt and reply substantively within 10 working days.

The timescales for completing the tasks above are measured from the date the Pensions Shared Service is in receipt of all the relevant information required to complete the task and is expressed in “working days”

Appendix 3 – Recovery of Additional Costs	
Task	Recharged Cost
Steps to recover additional administration costs will usually only be pursued after support and training had been offered by the Pensions Shared Service to address the underperformance.	
Late payment of Employer and / or Scheme Member contributions. Plus, any statutory charges.	£150 per occurrence (plus interest as defined in the LGPS Regulations)
Full Implementation of i-Connect (i.e. on time submissions of the i-Connect files for three payroll periods in a row)	From the 2020-21 year - Any late or incorrect submission of the i-Connect file will be charged at £75 per month. An “incorrect” file means a file with an error rate greater than 5% If by April 2021, full implementation has not been achieved then administration recharges up to £20,000 (depending on size of Employer) will be levied. Recharges will be levied to Employers on a similar basis in each subsequent April if i-Connect remains unimplemented.
Late provision of year end contributions returns in prescribed format – returns received after 30 April after the appropriate year end	£250 plus £100 for each week plus part week of continued non-provision.
Year End Data Queries – failure to respond to the Pensions Shared Service’s requests for information to resolve data queries within 10 working days	£50 per occurrence then £25 for every further 10 working days the information remains outstanding or where subsequent data returns are also inaccurate.
New member - failure to notify the Pensions Shared Service of a new member within 1 month of joining the LGPS	£50 per occurrence
Change Notification – failure to notify the Pensions Shared Service of a change to a member’s working hours, leave of absence with permission (maternity, paternity, career break) or leave of absence without permission (strike, absence without permission) – within 1 month of the change of circumstances	£50 per occurrence
Late provision of retirement leaver information, i.e. more than 15 working days after retirement date.	£50 per occurrence
Late notification of an early leaver i.e. more than 20 working days after date of leaving.	£50 per occurrence
Change of employer contact “nominated representative” details - the Pensions Shared Service not notified of contact change or new contact within 1 month of alteration	Reminder will be sent to Employers who do not respond. Following the second chase correspondence will be charged at £10 per communication.
Failure to notify the Pensions Shared Service of a contracting out involving a TUPE transfer before the transfer date.	£200 per occurrence
Failure to inform the Pensions Shared Service of a new Academy or Free School before their opening date.	
Fine from the Pensions Regulator	Amount determined by the Pensions Regulator
Fine from the Pensions Ombudsman (including “distress and inconvenience”	Amount determined by the Pensions Ombudsman

payments suggested by the its Early Resolution Service)	
No response (or inaccurate response) to queries and reminders raised by the Pensions Shared Service for information needed to perform a benefit calculation.	£50 per occurrence
No response to Pensions Shared Service request for LGPS discretions statement	£25 per reminder letter

Where the Pensions Shared Service determines that such additional costs should be recovered it will give written notice to the Employer stating the reasons, the amount, the basis of calculation and the relevant provisions of the PAS

Appendix 4 - Overriding Legislation
In performing the role of administering the LGPS, the Fund, the Pensions Shared Service and Employers must comply with overriding legislation (examples below) as amended
• The Occupational Pension Schemes (Disclosure of Information) Regulations 2015 • The Local Government Pension Scheme (Amendment) (Governance) Regulations 2015 • The Pensions Act 1995, 2004 and 2014 • Extant transitional regulations • The Discretionary and Compensation Regulations 2006 • The Disability Discrimination Act 2006 • The Finance Act 2004 • Employment Rights Act 2010 • HMRC legislation • Public Service Pensions Act 2013

Overriding legislation dictates the minimum standards that pension schemes should meet in providing information to the various associated parties including, importantly, members. The LGPS regulations also identify a number of requirements for the Fund, the Pensions Shared Service and Employers.

The PAS is designed to highlight the key areas for providing high quality administration of the LGPS but does not cover all regulatory requirements. Nothing in the PAS overrides or negates the duties of the Fund, the Pensions Shared Service or Employers of their obligations under the LGPS or overriding legislation.