



Cornwall Pension Fund

Administration Strategy

Approval Date December 2018

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1. INTRODUCTION AND BACKGROUND

- 1.1. This is the Pension Administration Strategy Statement for the Cornwall Pension Fund (“the Fund”) which has been developed following consultation with employers in the Fund. The aim of the strategy is to ensure both the Administering Authority and the employers are fully aware of their responsibilities under the Scheme, and to outline the performance standards they are expected to meet to ensure the delivery of a high-quality and cost-effective administration service. More detailed objectives of this strategy document are set out in Section 4.
- 1.2. Cornwall Council (the "Administering Authority") is responsible for the local administration of the Fund, which is part of the Local Government Pension Scheme (“the LGPS”). The Fund comprises over 130 employers with active members, and approximately 50,000 scheme members (including active members, deferred and pensioner members).
- 1.3. Delivery of a high quality administration service is not the responsibility of one person or organisation, but rather of a number of different parties, who between them are responsible for delivering the pensions administration service to meet the diverse needs of the membership.

2. IMPLEMENTATION

- 2.1. This Strategy Statement was approved by the Pensions Committee in December 2018. It is effective from 1 January 2019.

This Strategy applies to all existing employers in the Fund, and all new employers joining the Fund after the effective date above. The statement sets out the expected levels of performance of both the Administering Authority and the employers within the Fund, as well as details on how performance levels will be monitored and the action that might be taken where persistent failure occurs.

In preparing this Strategy we have consulted with the relevant employers and other persons considered appropriate.

We will review the Strategy to ensure it remains up to date and meets the necessary regulatory requirements at least every three years.

The Strategy will be available on our website at:

<https://www.cornwallpensionfund.org.uk>

2.2. Any enquiries in relation to the day to day administration of the Fund should be sent to:

- Cornwall Pension Fund
Fourth Floor, South Wing
County Hall
Truro
TR1 3AY
Email – pensions@cornwall.gov.uk
- Phone – 01872 322322

2.3. However, if you have an enquiry about the principles or content of this Strategy, please contact Matt Allen, Employer Liaison Officer:

- Cornwall Pension Fund
Fourth Floor, South Wing
County Hall
Truro
TR1 3AY
- E-mail – matthew.allen@cornwall.gov.uk or
 - pensions@cornwall.gov.uk
 - Phone - 01872 323563 or 01872 322322

3. REGULATORY BASIS

3.1. The LGPS is a statutory scheme, established by an Act of Parliament. The Local Government Pension Scheme Regulations 2013 (as amended) provide the conditions and regulatory guidance surrounding the production and implementation of an Administration Strategy.

3.2. In carrying out their roles and responsibilities in relation to the administration of the Local Government Pension Scheme the Administering Authority and employers will, as a minimum, comply with overriding legislation, including:

- Local Government Pension Scheme Regulations;
- Pensions Act 2011 and associated disclosure legislation;
- Freedom of Information Act 2000;

- Equality Act 2010;
- Data Protection Act 2018;
- Finance Act 2013; and
- Relevant Health and Safety legislation.

3.3. In particular, regulations 72, 73, 74, 75 and 80 of Local Government Pension Scheme Regulations 2013 require the following:

3.3.1. Employer Responsibilities:

- To decide any rights or liabilities of any person under the LGPS (for example, what rate of contributions a person pays and whether or not a person is **entitled** to any benefit under the scheme) as soon as is reasonably practicable
- To formally notify that person of the decision in relation to their rights or liabilities in writing as soon as is reasonably practicable (including a decision where a person is not entitled to a benefit and why not), including information about their internal dispute resolution procedure
- To inform the Administering Authority of all such decisions made
- To provide the Administering Authority with such information it requires so it can carry out its functions including as a minimum by the end of June each year the following information in relation to any person who has been an active member of the scheme in the previous year:
 - name and gender
 - date of birth and national insurance number
 - a unique reference number relating to each employment in which the employee has been an active member
 - in respect of each individual employment during that year:
 - the dates during which they were a member of the scheme
 - the normal pensionable pay received and employee contributions paid
 - the pensionable pay received and employee contributions paid whilst there was any temporary reduction in contributions
 - Full Time Equivalent pay for pre April 2014 service
 - the normal employer contributions paid
 - any additional employee or employer contributions paid
 - any Additional Voluntary Contributions paid by the employee or employer
- To appoint a person to consider complaints under stage 1 of the internal dispute resolution procedure relating to employer decisions (or a lack of a decision)

3.3.2. Administering Authority Responsibilities:

- To decide the **amount** of benefits that should be paid, including whether the person is entitled to have any previous service counting towards this for LGPS purposes, as soon as is reasonably practicable
- To formally notify that person of the decision in relation to the amount of their benefits in writing as soon as is reasonably practicable, including a statement showing how they are calculated and information about their internal dispute resolution procedure

- To appoint a person to consider complaints under stage 1 of the internal dispute resolution procedure relating to Administering Authority decisions (or a lack of a decision)
- To appoint a person to consider complaints under stage 2 of the internal dispute resolution procedure (which covers both employer and Administering Authority decisions or lack of decisions)
- To provide on request any information to an employer about a complaint under the internal dispute resolution procedure that may be required by an employer

3.4. Regulation 59(1) enables an LGPS Administering Authority to prepare a written statement ("the pension administration strategy") to assist in delivering a high-quality administration service to its scheme members and other interested parties, by setting out local standards which often go beyond the minimum requirements set out in overriding legislation as outlined above, and which the Administering Authority and employers should comply with. The statement can contain such of the matters mentioned below as they consider appropriate:-

- Procedures for liaison and communication with the relevant employers in their Fund.
- The establishment of levels of performance which the Administering Authority and the employers are expected to achieve in carrying out their functions under the LGPS by-
 - (i) the setting of performance targets;
 - (ii) the making of agreements about levels of performance and associated matters; or
 - (iii) such other means as the Administering Authority consider appropriate;
- Procedures which aim to secure that the Administering Authority and the employers comply with statutory requirements in respect of those functions and with any agreement about levels of performance.
- Procedures for improving the communication by the Administering Authority and the employers to each other of information relating to those functions.
- The circumstances in which the Administering Authority may consider giving written notice to an employer on account of that employer's unsatisfactory performance in carrying out its functions under the LGPS Regulations when measured against the desired levels of performance.
- The publication by the Administering Authority of annual reports dealing with—
 - (i) the extent to which the Administering Authority and the employers have achieved the desired levels of performance, and
 - (ii) such other matters arising from its pension administration strategy as it considers appropriate
- Such other matters as appear to the Administering Authority to be suitable for inclusion in that strategy.

- 3.5. Regulation 59(2) (e) allows an Administering Authority to recover additional costs from an employer where, in its opinion, they are directly related to the poor performance of that employer. Where this situation arises the Administering Authority is required to give written notice to the scheme employer, setting out the reasons for believing that additional costs should be recovered, the amount of the additional costs, together with the basis on which the additional amount has been calculated.
- 3.6. In addition, regulation 59(6) also requires that, where a pension administration strategy is produced, a copy is issued to each of the Fund's employers as well as to the Secretary of State. It is a requirement that, in preparing or revising any pension administration strategy, that the Administering Authority must consult the employers and such other persons as it considers appropriate.
- 3.7. Both the Administering Authority and employers must have regard to the current version of the pension administration strategy when carrying out their functions under the LGPS Regulations.
- 3.8. This statement, therefore, sets out the information required in accordance with regulation 59 and forms the basis of the day to day relationship between Cornwall Council as the Administering Authority and the employers of the Fund. It also sets out the circumstances where additional costs will be incurred as a result of the poor performance of an employer, together with the steps that would be taken before any such costs arose.

4. OUR ADMINISTRATION AIMS AND OBJECTIVES

- 4.1. The purpose of this strategy statement is to set out the quality and performance standards expected of Cornwall Council in its role of Administering Authority and its separate role as employer, as well as all other employers within the Fund. It seeks to promote good working relationships, improve efficiency and enforce quality amongst the employers and the Administering Authority. Our key objectives relating to administration are as follows;
 - Provide a high quality, seamless, informative, timely and customer focused administration service to the Fund's stakeholders.
 - Administer the Fund in a cost effective and efficient manner utilising technology appropriately, with the focus on a 'digital first' approach.
 - Be accountable and take responsibility for our actions.
 - Ensure the Fund's employers are aware of and understand their roles and responsibilities under the LGPS regulations and in the delivery of the administration functions of the Fund.
 - Ensure benefits are paid to, and income collected from, the right people at the right time in the right amount.
 - Maintain accurate records and ensure data is protected and has authorised use only.
 - Put in place standards for the Fund and its employers and ensure these standards are monitored and developed as necessary.

- 4.2. Our separate Communications Policy has a number of specific objectives relating to how we communicate with our stakeholders. This is available on our website: <https://www.cornwall.gov.uk/jobs-and-careers/cornwall-pension-fund/investments/regulatory-statements/>

5. COMMUNICATION

- 5.1 Good communication reminds, or alerts, employees to the value of the LGPS which aids recruitment, retention and the motivation of the workforce and negates misleading media information. Effective communication between an Administering Authority and its Fund employers reduces errors, improves efficiency and leads to good working relationships.
- 5.2 Where areas of improvement are identified from benchmarking or performance monitoring as indicated in the above section, our Employer Liaison Officer (see below) will be responsible for working closely with the employers in improving the identified weaknesses.
- 5.3 As part of the review process any new procedures or practices introduced will be kept under review to monitor achievement.

5.4 Communication with Employers

5.4.1 Employer key contact officers and meetings

Each employer in the Fund will designate a named individual to act as their key contact officer; this individual will be the main contact with regard to any aspect of administering the LGPS and the employer will ensure they keep the Administering Authority aware of the contact details for that person.

Our Employer Liaison Officer will contact, and where relevant, meet with the employer key contact officer to discuss any issues relating to the LGPS and/or raise any issues around the performance of the employer or services provided by the Administering Authority. Meetings will be arranged if necessary (particularly if specific issues around the performance of the employer arise). The contact details for the Employer Liaison Officer are shown on page 4.

5.4.2 Employer Guidance

The Employer Guidance will be maintained on the Cornwall Pension Fund website. It will outline all the key responsibilities and processes that must be carried out by each employer as well as specifying the format of all information to be provided. An e-mail will be issued to all employers when this guidance is updated, and all new employers will be provided with a link to this guidance when they join the Fund.

5.4.3 Newsletters

In addition to the employer guide, the Fund will also issue a periodic newsletter to employers, bringing to their attention areas of performance or quality where improvements were identified and the steps taken to address them. They will also include information relating to changes to scheme rules and employer procedures or responsibilities associated with them. These will be issued by e-mail as and when required.

5.4.4 E-mail Updates

Other information and procedural requirements, such as the annual year-end procedures, will be disseminated by e-mail.

5.4.5 Training sessions

The Fund will provide training to scheme employers as and when required or on request from the scheme employer. All new employers in the Fund will also be provided with training. Employers will be expected to attend any such training, particularly where significant performance issues have been identified.

5.4.6 Employer forums

The Fund will host an employer forum periodically to which all employers will be invited. The forum will include updates on recent developments within the LGPS or pensions generally, as well as to report and review the performance of the Pension Fund.

5.4.7 Employer specific events

The Pension Administration Team will also be happy to attend any employer specific events to assist employers to understand their responsibilities.

5.5 Information for Scheme Members:

5.5.1 Website

The Fund's website www.cornwallpensionfund.org.uk contains information about the Fund and the LGPS. More detailed information can be obtained at www.lgpsmember.org

5.5.2 Member Self Service

It is intended to introduce an on-line self-service facility throughout 2019, which will give members a more intuitive access to their own pension records, and this 'digital first' initiative should eventually result in fewer enquiries being dealt with by the Pension Administration Team, as members resolve many issues themselves.

5.5.3 Annual Benefit Statements

These statements are sent annually to all active and deferred scheme members. These are posted directly to members.

5.5.4 Newsletters

The Fund also issues a periodic newsletter to scheme members, bringing to their attention information such as changes to scheme rules. These are usually issued with annual benefit statements.

5.5.5 Individual Scheme member meetings

One to One meetings are available with a member of the Pension Administration Team as required at Cornwall Council offices.

5.5.6 Pension Presentations

Presentations are given to staff, managers, new employees etc. on pension related matters including as part of induction and pre-retirement sessions on request.

5.5.7 Helpline and email

Scheme members can contact the Pension Administration Team directly using the following contact details:

- E-mail – pensions@cornwall.gov.uk
- Telephone helpline – 01872 322322

6 DELIVERY OF ADMINISTRATION

- 6.1. Cornwall Council has delegated responsibility for the management of the Pension Fund to the Pensions Committee. The Pensions Committee has delegated some responsibilities to the Chief Operating Officer. Full details are set out in the Governance Policy Statement on our website <https://www.cornwall.gov.uk/jobs-and-careers/cornwall-pension-fund/investments/regulatory-statements/>
- 6.2. Operationally, the administration of the Fund is undertaken 'in-house' within Cornwall Council. Most LGPS administering authorities provide the administration service from internal teams, although some have outsourced (or partially outsourced) their administration, and some utilise shared service administration arrangements across more than one Fund. At this point in time, Cornwall Council believes in-house administration is the most appropriate method for ensuring the objectives of the Fund are met.

7. PERFORMANCE STANDARDS AND RESPONSIBILITIES

7.1. Quality

7.1.1. Local Standards

The legislative and regulatory standards are set out in Section 3. On top of these, the Administering Authority and employers will ensure that all functions/tasks are carried out to agreed local quality standards. In this respect the standards to be met are:

- compliance with all requirements set out in the employer guide
- information to be provided in the required format and/or on the appropriate forms contained within the employer guide and on our website
- information to be legible and accurate
- communications to be in a plain language style
- information provided or actions carried out to be checked for accuracy by an appropriately trained member of staff
- information provided or actions carried out to be authorised by an agreed signatory, and
- actions carried out, or information provided, within the timescales set out in this strategy document.

7.1.2. Secure data transfer

The Administering Authority and employers will follow Cornwall Council's data security guidelines when sending any personal data. This means that if data is sent by email it should be sent using a secure system such as Egress or Cryptshare and if this is not possible the data should be sent encrypted using Winzip or equivalent, with the password supplied separately.

7.1.3. Oversight of Compliance and Quality

Ensuring compliance is the responsibility of the Administering Authority and the employers in the Fund. However there are ways in which they will be subject to elements of scrutiny or oversight:

Audit - The Fund will be subject to a regular annual audit of its processes and internal controls. The Administering Authority and the employers will be expected to fully comply with any reasonable requests for information from both internal and approved external auditors. Any subsequent recommendations made will be considered by Cornwall Council and where appropriate duly implemented (following discussions with employers where necessary).

Local Pension Board, the national Scheme Advisory Board and the Pensions Regulator – The Public Service Pensions Act 2013 introduced greater oversight through these entities. As a result the Local Pension Board of the Cornwall Pension Fund was established in July 2015. In addition, the Pensions Regulator's remit was extended to include the public sector, and a national Scheme Advisory Board was created. The Administering Authority and the employers are expected to fully comply with any guidance produced by the Scheme Advisory Board and the Pensions Regulator. Any recommendations made by any of these entities will be considered by the Administering Authority, and where appropriate duly implemented (following discussions with employers where necessary).

7.2. Timeliness and accuracy

Overriding legislation dictates minimum standards that pension schemes should meet in providing certain pieces of information to the various parties associated with the scheme. The LGPS itself sets out a number of requirements for the Administering Authority or employers to provide information to each other, to scheme members and to prospective scheme members, dependants, other pension arrangements or other regulatory bodies. Locally agreed performance standards have been agreed which cover all aspects of the administration of the scheme, where appropriate going beyond the overriding legislative requirements.

For the avoidance of doubt “accuracy” in this Strategy is defined as when we have received a completed form or transfer of information with no gaps in mandatory areas and with no information which is either contradictory or which we need to query.

The target service standards below relate to a date of event being either the date the member started or left the Fund, or when relevant details changed such as commencing a period of long term absence. However where information is required in order to carry out that responsibility, the target service standard is from the date of receipt of all relevant information.

These locally agreed performance standards for the Fund are set out in the following tables. This table isn't an exhaustive list of the Administering Authority's and employers' responsibilities. Employers' responsibilities are provided in more detail in the Employers' Guide. Target standards shown in ***bold italics*** will be monitored and reported on.

New Appointments	
Employer's responsibility	Target Service Standard
To ensure that pensions information is included as part of any induction process	As required
To provide each new employee with basic scheme information	Within one month of start date
Administering Authority's Responsibility	
To provide employers (on request) with appropriate information for inductions	Within 10 working days of request

New Scheme Members	
Employer's responsibility	Target Service Standard
Provide new members with Election form	Within 10 working days of start date
Decide and ensure the correct employee contribution rate is applied	Immediately on joining in line with employer's policy, and each April thereafter (as a minimum)
Send a Notification of Joining the LGPS to a scheme member	Within 10 working days of start date
Provide new starter information to the Administering Authority for each new employee joining the LGPS. Where there is more than one contract of employment with the same employer, separate notifications of those employments will be required.	Within 1 month of start date
Forward completed New Entrant and Election forms completed by scheme members to the Administering Authority	Within 5 working days of receipt
Administering Authority's Responsibility	
Provide new members with scheme guides	Within 2 months of start date
To accurately record and update member records on the pension administration system	Within 5 working days of receipt of data
To apply for any transfer value details from a previous fund or scheme	Within 5 working days of receipt of request
To send a Notification of Joining the LGPS to a scheme member for an in-house payroll	Within 20 working days of receipt of data from employer
To send a Notification of Joining the LGPS to a scheme member for an external payroll	Within 10 working days of receipt of data from employer

Changes in circumstances	
Employer's responsibility	Target Service Standard
Arrange for reassessment of employee contribution rate in line with employer's policy	If applicable, as per employer's policy
Notify the Administering Authority of any eligible employees who opt out of the scheme within three months of appointment.	Within 10 working days of receipt of opt-out form
Send a Notification of Change (or equivalent) if legally required to a scheme member	Within 20 working days of change
Notify the Administering Authority of all other relevant changes in the circumstances of employees	Within 1 month of change
Refund any employee contributions deducted in error, or where the member opts out in writing within 3 months with no previous LGPS membership.	Month following the month of election
Notify the Fund of any periods of unpaid leave	Within 1 month of the member returning to work
Administering Authority's Responsibility	
To accurately record and update member records on the pension administration system	Within 15 working days of receipt of data
To send a Notification of Change (or equivalent) if legally required	Within 15 working days of receipt of data

Retirement Estimates (including ill-health)	
Employer's responsibility	Target Service Standard
Notify the Fund when a member is due to retire, including as accurate assessment of final pay as possible and reason for retirement (ensuring authorisation and available discretionary power where appropriate)	As early as possible and no later than 15 working days before date of retirement
Administering Authority's Responsibility	
<i>Providing quotations on request for retirements within 12 months of request</i>	<i>Within 20 working days of request</i>
Providing provisional statement of retirement benefits for deferred members	2 months before normal retirement date

Actual Retirements (including ill-health)	
Employer's responsibility	Target Service Standard
Notify the Fund when a member leaves employment, including an accurate assessment of final pay	Within 20 working days of leaving
Send a Notification of Entitlement of Benefit if legally required to a scheme member (including determining tier of ill-health retirement if applicable)	No later than 10 working days before date of retirement
Administering Authority's Responsibility	
To accurately record and update member records on the pension administration system	Within 10 working days of receipt of data
<i>Notification of amount of retirement benefits and payment of tax free cash sum</i>	<i>Within 10 working days of receipt of fully completed claim forms from member or date of leaving whichever is later</i>
Notification of amount of recalculated retirement benefits and payment of any balance tax free cash sum following updated information	Within 10 working days of receipt of information

Ill-Health Retirements (additional responsibilities)	
Employer's responsibility	Target Service Standard
Appoint a qualified independent medical practitioner in order to consider all ill health retirement applications, and agree this appointment with the Fund.	Within one month of becoming an employer within the Fund
To keep a record of all Tier 3 ill-health cases and to review these cases after 18 months	
Notify the Fund of the results of any review of Tier 3 ill-health cases with appropriate information to allow the Fund to recalculate benefits if necessary	Within 5 working days of receiving results of review
Send a Notification of Entitlement of Benefit (or change in benefit) to a scheme member following the review of his/her Tier 3 ill-health benefits	Within 5 working days of receiving results of review
Administering Authority's Responsibility	
To notify employers prior to scheduled discontinuation of benefit payments, and before updating the member records to "pensioner with deferred benefits".	3 months prior to scheduled discontinuation date

Members leaving before retirement	
Employer's responsibility	Target Service Standard
Notify the Fund of the member's date of (and reason for) cessation of membership, and all other relevant information.	Within 10 working days of leave date
Administering Authority's Responsibility	
To accurately record and update member records on the pension administration system	Within 10 working days of receipt of data
To inform members who leave the scheme (and are not eligible for immediate benefits) of their options and their deferred benefit or refund entitlement as applicable	Within 20 working days of receipt of data
Provide a refund of contributions where requested	Within 20 working days of receipt of request
Provide a statement of current value of deferred benefits on request	Within 10 working days of receipt of request

Death Benefits	
Employer's responsibility	Target Service Standard
Notify the Fund of the death of a member and provide details of next of kin where available	Within 5 working days of notification
Administering Authority's Responsibility	
Write to next of kin or other contact requesting information following the death of a scheme member	Within 10 working day of notification
<i>Calculate and notify dependant(s) of amount of death benefits</i>	<i>Within 10 working days of receipt of all relevant information</i>
<i>Decide who should be recipient(s) of death grant and pay death benefits appropriately as directed</i>	<i>Within 10 working days of receipt of all relevant information</i>

Transfers	
Employer's responsibility	Target Service Standard
Notify the Fund if the employer intends to outsource services that will involve TUPE transfers of staff, and work with the Fund to ensure an admission agreement is put in place and complied with or a bulk transfer arranged.	Initial notification within 5 working days of becoming aware of potential outsourcing
Administering Authority's Responsibility	
Liaise with new provider to arrange admitted body status	Within 5 working days of receipt of notification from scheme employer.
<i>Obtain transfer details for transfer in, and calculate and provide quotation to member</i>	<i>Within 20 working days of receipt of information</i>
Request transfer value upon acceptance of transfer in	Within 10 working days of receipt of acceptance
Notify scheme member of benefits purchased by transfer in on receipt of payment	Within 10 working days of receipt of payment
<i>Provide details of transfer value for transfer out, on request</i>	<i>Within 20 working days of receipt of request</i>
Provide payment of transfer value to appropriate recipient.	Within 10 working days of receipt of payment request

Additional Benefits (APCs and AVCs)	
Employer's responsibility	Target Service Standard
Commence, cease or amend (as appropriate) deduction of APCs and AVCs	In month following election
Administering Authority's Responsibility	
To provide information on APCs / AVCs on request to members and employers.	Within 10 working days of request

Various Financial Obligations	
Employer's responsibility	Target Service Standard
Electronically pay the Fund all employee contributions deducted from payroll and all employer contributions.	By 22 nd of the month following the month in which contributions were deducted from pay.
Pay all rechargeable items to the Fund, including additional fund payments in relation to early payment of benefits.	Within 20 working days from receiving invoice
Pay all additional costs to the Fund associated with the unsatisfactory performance of the employer	Within 20 working days from receiving invoice
Administering Authority's Responsibility	
To allocate the received contributions to each employer's cost centre	Within 5 working days of receipt of contributions
Issue invoice in relation to additional fund payments in relation to early payment of benefits	Within 10 working days of retirement date (or information being received if later)
Inform the employers of any new contribution banding	Within 5 working days of receipt of information
Notify member of calculation and new value of pension following annual pensions increase	No later than 2 working days after payment of revised pension

Annual Return, Valuation and Annual Benefit Statements	
Employer's responsibility	Target Service Standard
Provide the Fund with year-end information to 31 March each year, and any other information that may be required for the production of Annual Benefit Statements.	By 30 April annually
Administering Authority's Responsibility	
Process employer year end contribution returns	Within 2 months of receipt of data
<i>Produce annual benefit statements for all active and deferred members.</i>	<i>By 31 August each year in line with LGPS regulations timescales</i>
Provide information to the Actuary (or GAD as appropriate) for both the actuarial valuation and for accounting purposes.	As agreed between the Fund and the Actuary.
Provide an electronic copy of the valuation report and associated certificate to each employer, and to answer any questions arising.	Within 5 working days of receipt of report

General	
Employer's responsibility	Target Service Standard
Confirm a nominated representative to receive information from the Fund, and to take responsibility for disseminating it within the organisation.	By effective date of admission to the Fund or within 5 working days of previous representative leaving
Formulate, publish and review policies regarding all discretions that the employer may exercise, and provide a copy to the Fund.	Within 3 months of joining the Fund and also provided to Administering Authority every 3 years
Respond to enquiries from the Fund.	Within 10 working days of receipt
Distribute any information provided by the Fund to members / potential members	Within 10 working days of receipt
Put in place a Stage 1 Internal Dispute Resolution Procedure	Within 3 months of joining the Fund and before the effective date of any change to the existing procedure (e.g. an appointed person leaving)
Administering Authority's Responsibility	
Arrange for the setting up of an admission agreement where required	Within 3 months of all information being provided
Publish and keep up to date the Scheme Members' Guide and Employers' Procedural Guide.	Updates made within 20 working days of any legislation changes
Publish and keep up to date all forms that members, prospective members and employers are required to complete.	Updates made within 10 working days of any legislation changes
Publish the Fund's annual report and accounts and any report from the auditor	By 1 December annually
<i>Provision of other responses to general enquiries from scheme members and employers</i>	<i>Within 10 working days of receipt</i>
Put in place a Stage 1 Internal Dispute Resolution Procedure	Before the effective date of any change to the existing procedure (e.g. an appointed person leaving)
Put in place a Stage 2 Internal Dispute Resolution Procedure	Before the effective date of any change to the existing procedure (e.g. an appointed person leaving)

Pension Payments	
Administering Authority's Responsibility	Target Service Standard
Issue pension payments to designated bank accounts	To arrive on payment due date
Issue payslips to home addresses where net pension payment varies by more than £5 from the previous month	Posted so as to arrive on the payment due date
Investigate returned payments and action appropriately	Within 10 working days of payment being returned
<i>Respond to pensioner queries in writing</i>	<i>Within 10 working days of receipt</i>
<i>Implement a change to pension in payment</i>	<i>By next payroll period</i>

For the avoidance of doubt, date of receipt of anything by the Administering Authority is deemed to be the same day where receipt is before 5pm and is deemed to be the following day when receipt is after 5pm.

8. IMPROVING EMPLOYER PERFORMANCE (WHERE NECESSARY)

- 8.1. The Employer Liaison Officer will seek, at the earliest opportunity, to work closely with employers in identifying any areas of poor performance or misunderstanding, provide opportunities for necessary training and development and put in place appropriate processes to improve the level of service delivery in the future.
- 8.2. Where persistent and ongoing failure occurs and no improvement is demonstrated by an employer, and /or unwillingness is shown by the employer to resolve the identified issue, the following sets out the steps we will take in dealing with the situation in the first instance:
 - The Employer Liaison Officer will write to the person nominated by the employer as their key point of contact, setting out the area(s) of poor performance.
 - The Employer Liaison Officer will meet with the employer to discuss the area(s) of poor performance and how they can be addressed.
 - Where no improvement has been demonstrated by the employer, or where there has been a failure to take agreed action by the employer, the Employer Liaison Officer will consult with the Head of Pensions and if considered appropriate, will issue a formal written notice to the employer setting out the area(s) of poor performance that has been identified, the steps taken to resolve those area(s) and giving notice that the additional costs may now be reclaimed.
 - The Employer Liaison Officer will clearly set out the calculations of any loss or additional costs resulting to the Fund / Administering Authority, taking account of time and resources in resolving the specific area of poor performance; and

- The Fund will make a claim against the employer, setting out the reasons for doing so, in accordance with the Regulations.
- The employer will be offered the option of attending a specific training course hosted by either the Administering Authority or an external organisation in order to improve performance, as an alternative to paying any financial penalty.
- The Fund will consider whether a material breach has occurred which requires a report to The Pensions Regulator.

8.3. Circumstances where the Administering Authority may levy costs associated with the employer's poor performance

Cornwall Pension Fund will work closely with all employers to assist them in understanding all statutory requirements, whether they are specifically referenced in the LGPS Regulations, in overriding legislation, or in this Administration Strategy. Cornwall Pension Fund will also work with them to ensure that overall quality and timeliness is continually improved.

The Regulations provide that an Administering Authority may recover from an employer any additional costs associated with the administration of the scheme incurred as a result of the unsatisfactory level of performance of that employer. Where an Administering Authority wishes to recover any such additional costs they must give written notice stating:-

- The reasons in their opinion that the employer's level of performance contributed to the additional cost;
- The amount the Administering Authority has determined the employer should pay;
- The basis on which this amount was calculated; and
- The provisions of the pension administration strategy relevant to the decision to give notice.

Any additional costs incurred by the Fund in the administration of the LGPS as a direct result of such unsatisfactory performance will be recovered from the employer. The circumstances where we will recover such additional costs from the employer include:

- persistent failure to provide relevant information to the Administering Authority, scheme member or other interested party in accordance with specified performance targets (as a result of either quality of information, format of information or timeliness of delivery)

- failure to pass relevant information to the scheme member or potential members, either due to poor quality or not meeting the agreed timescales outlined in the performance targets
- failure to deduct and pay over correct employee and employer contributions to the Fund within the stated timescales
- instances where the performance of the employer results in fines being levied against the Administering Authority by the Pensions Regulator, Pensions Ombudsman or other regulatory body.
- Payment of contributions by cheque rather than electronic transfer unless otherwise agreed by the Administering Authority

In addition, interest will be charged on late contributions in line with the LGPS Regulations.

8.4. Calculation of costs incurred

For a persistent failure to resolve an isolated case satisfactorily we will recharge costs from the point in time at which a formal letter is written to the employer until the case is resolved, at a rate of £100 for each hour an officer spends trying to resolve the matter, exclusive of VAT.

For persistent and ongoing failure to meet targets, following the intervention to assist the employer concerned, we will recharge the additional costs due to the employer's unsatisfactory performance at the rate of £100 per hour spent, exclusive of VAT, from the point in time that the formal letter was sent, until performance improves.

For payment of contributions by cheque, unless otherwise agreed by the Administering Authority, the Fund will charge £50 plus VAT per cheque processed.

Where the performance of the employer results in fines or additional costs being levied against the Fund we will recharge the full costs it has incurred to the relevant employer.

All such costs or fines will be levied against the scheme employer, even where the fault may lie with an external provider appointed by the scheme employer.

9. PERFORMANCE MEASURES AND IMPROVEMENT PLANS

We will monitor performance as Administering Authority in carrying out our responsibilities in relation to the scheme, and will regularly monitor performance by benchmarking against other administering authorities, using benchmarking clubs and other comparators available. How well the Fund performs will be reported in the Fund's Annual Report based on the statistics available at that time. We will monitor success against our administration objectives in the following ways:

Objectives	Measurement
Provide a high quality, seamless, informative, timely and customer focused administration service to the Fund's stakeholders.	Key target service standards (highlighted in table above) achieved in 90% of cases*. Annual satisfaction surveys with employers and random scheme members achieving 80% of scores in positive responses in these areas.
Administer the Fund in a cost effective and efficient manner utilising technology appropriately.	Cost per member is not in upper quartile when benchmarked against other Councils.
Be accountable and take responsibility for our actions	Annual satisfaction surveys with employers and scheme members achieving 80% of scores in positive responses in these areas.
Ensure the Fund's employers are aware of and understand their roles and responsibilities under the LGPS regulations and in the delivery of the administration functions of the Fund.	Annual data checks (including ongoing reconciliations) resulting in few issues that are resolved within 2 months. Key target service standards (highlighted in table above) achieved in 90% of cases*.
Ensure benefits are paid to, and income collected from, the right people at the right time in the right amount.	Mainly positive results in audit and other means of oversight/scrutiny. Key target service standards (highlighted in table above) achieved in 90% of cases*.
Maintain accurate records and ensure data is protected and has authorised use only.	Annual data checks (including ongoing reconciliations) resulting in few issues that are all resolved within 2 months No breaches of data security protocols Mainly positive results in audit and other means of oversight/scrutiny
Put in place standards for the Fund and its employers and ensure these standards are monitored and developed as necessary.	As outlined against the objectives above.

*We also expect employers to meet targets in 90% of cases.

An overview of our performance against these objectives and in particular our target standards for turnaround times will be reported within the Fund's annual report and accounts.

Where performance is substantially below standard (whether by a large margin for a short period of time or a small margin for a longer period of time) the Administering Authority will formulate an improvement plan which will be incorporated into the Fund's annual Business Plan. This will be reported to the Fund's Pensions Committee together with an ongoing update on achievement against the improvement plan.

10. KEY RISKS

The key risks to the delivery of this Strategy are outlined below. The Head of Pensions, the Pensions Administration Manager and the Pension Investment Officer will work with the Pensions Committee in monitoring these and other key risks and considering how to respond to them.

- Changes in government / legislative requirements meaning responsibilities are changed / removed / added
- The administration system provider not providing a robust system or not making changes to the system in a timely manner
- Key staff at the Administering Authority leaving and not being replaced with staff with similar experience, and without appropriate transitional handover
- Pensions staff not having suitable resource and/or knowledge to undertake their responsibilities
- Employers not having suitable resource and/or knowledge to understand their responsibilities
- Government or other pressure to outsource or merge pension teams
- Employers not accepting or being aware of their responsibilities in relation to the Fund
- Lack of engagement by the Pensions Committee on administration matters