



Pensions Administration Strategy

London Borough of Sutton Pension Fund

July 2024

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1. Introduction

This is the pension administration strategy (“the Strategy”) of the London Borough of Sutton Pension Fund in relation to the Local Government Pension Scheme (LGPS). This is the current Strategy in force and replaces all previous versions.

The role of administering authority for the London Borough of Sutton Pension Fund is discharged by the shared pensions administration service and the shared finance service. Both of these services are hosted by Sutton Council. The shared HR service, hosted by Kingston Council, provides the pensioner payroll. In this Strategy, the following terms will be used:

- **Pension Fund (“the Fund”)** which deals with LGPS administration, investments, actuarial valuation processes and collection of contributions and is based at Civic Offices, St Nicholas Way, Sutton SM1 1EA.
- **Scheme Employers (“Employers”)** who participate in the LGPS as a scheduled body 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](#). In discharging their roles and responsibilities under these regulations, the Fund and Employers are also required to comply with any overriding legislation and follow any regulatory guidance or Code of Practice issued by The Pensions Regulator regarding:

- Data quality.
- Completeness.
- Timeliness.

This Strategy sets out the standard of performance and best practice that the Fund and the Employers should aim to meet when carrying out their scheme functions. It will be reviewed triennially and will be revised to reflect changes to:

- LGPS regulations.
- Policies determined by the Fund.
- Administrative practices executed by the Fund and its Employers.

This Strategy applies not only to existing Employers but will also apply to all new future Employers of the Fund. Schools (other than Academies, Free Schools and University Technical Colleges) are included under the relevant local authority even if they have their own payroll or have outsourced it to a third party.

If you require any further information about anything in or related to this Strategy, please contact the Fund by email at skemployers@sutton.gov.uk.

2. Legislative Background

The legal context of the Strategy is Regulation 59 of the LGPS Regulations 2013, which provides authority for Administering Authorities to create a pension administration strategy. This Strategy sets out requirements to facilitate best practice and efficient customer service in respect of the following:

- The levels of performance which the Fund and Employers are expected to achieve in carrying out their scheme functions.
- Ensuring the Fund and Employers comply with statutory requirements in respect of those functions.
- Improving communications between the Fund and Employers to carry out those functions.

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

This Strategy is published on the [Fund's website](#) and is signposted to all participating Employers as required. It is formally approved by Sutton Council's Pension Committee in its role as the Administering Authority of the Fund. A copy will also be submitted to the Secretary of State as required in Regulation 59 of the LGPS Regulations 2013.

The Strategy is implemented from 1 July 2024 following a period of consultation with the Fund and Employers.

The Local Pension Board, in its role of assisting the Fund to ensure effective administration and governance of the LGPS, will also monitor the operation of the Strategy.

3. Aims and objectives

The aims of this Strategy are to:

- Support the provision of a high-quality pension service to Fund members delivered through efficient working practices.
- Clearly set out the respective roles and responsibilities of the Fund and Employers.
- Ensure the Fund operates in accordance with LGPS regulations and Codes of Practice issued by The Pensions Regulator.
- Set out the quality and performance standards expected by the Fund and its Employers in relation to each other.
- Promote good working relationships, transparency and improve efficiency between the Fund and its Employers for the benefit of scheme members.
- Provide a framework to enable administration costs relating to significant Employer underperformance to be met directly by the Employer responsible, rather than shared across all the Employers in the Fund.

The efficient delivery of the benefits of the scheme is reliant upon effective administrative procedures being in place between the Fund and Employers, notably the timely exchange of accurate information in relation to scheme members.

The Strategy should help ensure that the Fund and Employers understand their respective roles and responsibilities under the LGPS regulations to deliver these administrative procedures.

This Strategy sets out the expected levels of performance of the Fund and Employers. The Strategy 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.

4. Development of the Fund's administration

Pensions Online

The Fund has a secure, online portal called [Pensions Online](#) to allow its members to:

- Update their personal information.
- View their pension record and scheme documents.
- Project their pension benefits.

This online service will become the Fund's default method of communication with scheme members.

The Fund is currently promoting this service to scheme members as set out in the Fund's Communications Statement in **Appendix 4**. Employers are expected to actively promote this online service and encourage their employees participating in the LGPS to register.

Pensions Online is the default method for supplying annual statements to active and deferred members, however, all active and deferred Fund members can request their annual statement by post each year as required.

Email is the default method for supplying payment advice slips and P60s to pensioner and dependant pensioner members, however, members can opt to receive their payment advice slips and P60s by post.

5. Roles and Responsibilities

The aims of this strategy will be achieved by:

- Clearly defining the respective roles of Employers and the Fund.
- Setting clear and achievable standards of service levels for the functions carried out by Employers and the Fund.
- Setting out clear procedural guidance for the secure and effective exchange of information between Employers and the Fund.
- Monitoring service delivery, identifying poor performance and establishing a platform for the provision of support to improve where required.
- Applying additional charges where an Employer consistently fails to meet deadlines and standards set out in this strategy.

5a. The Fund's Roles and Responsibilities

The responsibilities for the Fund 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 Strategy.
- Maintain and review the Fund's policies, strategies, statements, reports and all other matters relating to the governance of the scheme. The Fund's policies, strategies and statements can be viewed on the [Fund's website](#).
- Communicate and engage with Employers on LGPS matters.
- Provide support and training to Employers.
- Maintain and develop an effective web presence for the benefit of members and Employers.

A guide to the Fund'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.

5b. The Employer's Roles and Responsibilities

The key responsibilities for Employers are to:

- Communicate details of the LGPS to eligible staff and participating members of the LGPS.
- Apply LGPS regulations.
- Report information to the Fund as set out in this Strategy or upon request.

A guide to the Employer's roles and responsibilities are 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 Fund to deliver an efficient, accurate and high-quality pension service to scheme members.

Each Employer will designate a named individual to act as the main point of contact (nominated representative) regarding any aspect of administering the LGPS. Please let the Fund know immediately if a nominated representative leaves your organisation and the name and contact details of the replacement representative.

The key responsibilities for the nominated representative will be to:

- Act as a conduit for communications to appropriate staff within the Employer, for example, Human Resources, Payroll teams, Directors of Finance.
- Ensure that standards and levels of service that are set out in this Strategy are achieved.
- Ensure that details of all nominated representatives and authorised signatories are correct and to immediately notify the Fund of any changes.
- Assure data quality and ensure the timely submission of data to the Fund.
- Ensure payments due to the Fund are made in accordance with legislation and as set out in this Strategy.
- Ensure that the Employer has an up to date statement of Employer discretions.
- Arrange distribution of communications literature when required.
- Assist and liaise with the Fund on promotional activities.
- Inform the Fund of any TUPE of LGPS eligible staff.
- Inform the Fund of changes to an Employer's payroll provider or any other service delivery agreement.
- Notify the Fund of breaches of the LGPS and related statutory regulations.
- Notify the Fund of all applications received under the Internal Dispute Resolution Procedures (IDRP)

6. Performance Reporting

The partnership between the Fund and Employer's is important for the successful, ongoing administration of the scheme. The Fund has a role to support Employers in meeting their responsibilities. The cost of underperformance on the part of one Employer is to be charged to that Employer, rather than being shared across all Employers.

If Employers have concerns about the data they provide, they should contact the Fund without delay. This will allow the Fund to help resolve any issues and enable both parties to meet their requirements for the benefit of scheme members.

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

It is the responsibility of the Fund and the Employer's to comply with the LGPS regulations and the standards set out in this Strategy. This section describes how the Fund:

- Monitors performance and compliance.
- Addresses the costs of underperformance.
- Sets penalty charges.

6a. Monitoring Performance and Compliance

The Fund will monitor, measure and report on the Fund's and the Employers compliance with the agreed service standards outlined in this document on a regular basis to the Local Pension Board and Pension Committee.

The Fund monitors its own performance against internal key performance indicators (KPIs). Monitoring is carried out on a monthly basis and is reported to the Local Pension Board and Pension Committee periodically. The performance of Employers against the standards set out in this document, including data accuracy, are also reported to the Local Pension Board and Pension Committee.

The Fund will report back to Employers where required about their individual performance, identifying any areas for improvement including outstanding data items.

Where an Employer declines to work with the Fund to resolve problems and consistently fails to meet its responsibilities under the LGPS regulations, the Fund (or stakeholders such as the Local Pension Board) has a duty to report such breaches to The Pensions Regulator, who has the regulatory power to take enforcement action and, if necessary, apply fines.

6b. Addressing the Cost of Underperformance

The Fund monitors any additional costs incurred in the administration of the Scheme as a direct result of underperformance and reserves the right, at its own discretion, to recover these costs.

An invoice will then be issued to the Employer with a notification setting out the calculations of any additional administration costs incurred by the Fund, or additional cost, taking account of time and resources in resolving the specific area(s) of poor performance, in accordance with the charging scales set out in this document.

In addition to recovering additional costs, where an Employer has demonstrated continued underperformance, the Fund will take the following steps:

1. Write to the Employer

Setting out the area(s) of poor performance; and if necessary, meet with the Employer to discuss the area(s) of poor performance and how these can be addressed. This may include attendance at a training session if required.

2. Arrange a meeting with Fund representatives

An Employer will be asked to attend a meeting with representatives of the Fund to discuss area(s) of non-compliance with performance standards and to agree an improvement plan where the Employer has not:

- Demonstrated improvement.
- Taken the agreed actions.
- Responded to the initial letter.

Where appropriate in respect of Admission Bodies, the letting employer will be informed and expected to work with the Fund and the Admission Body to resolve the issues.

3. 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, the Fund may report the Employer to The Pension Regulator.

Such instances will be presented to the Pension Committee and the Local Pension Board detailing charges levied against Employers and outstanding payments. This will also be reported in the Fund's published Annual Report.

Where it is necessary to ensure that members' benefits are not delayed unduly due to Employers' underperformance in providing the required information, the Fund reserves the right to calculate and pay benefits based on the best information available. The basis of the

calculation will be explained to the member and Employer in each case, and further to completing the process above, the costs of additional administration caused by the need for a subsequent revision of benefits will be charged to the Employer.

6c. Charges

In the event of continued poor performance the Fund will seek to recover any additional costs arising.

A summary of the additional costs that the Fund will seek to recover is provided in **Appendix 3**. In addition, any third-party costs or regulatory fines incurred by the Fund because of administrative failures or poor performance will be recovered from the Employer. These may include:

- Fines imposed by The Pension Regulator.
- Additional charges in respect of actuarial fees, legal fees, third party charges.
- Additional printing and distribution costs.

The Fund will recover additional costs incurred in the administration of the scheme as a direct result of the poor performance of any Employer. 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 Fund (other than monthly contributions) within 30 days, interest for late payment may be charged accordingly. This includes charges and recharges levied under this Strategy.

7d. Feedback from Employers

The Fund will monitor its performance against the standards in this Strategy, as set out in **Appendix 2**, from the event date (e.g. date of leaving or the date that all necessary data has been received) to the date of the completion of the task.

Employers who wish to provide feedback on the performance of the Fund against the standards in this Strategy should email skemployers@sutton.gov.uk. Please begin the subject line of your email with "Performance of the Fund".

7. Audit

The Fund is subject to regular audits of its processes and internal controls. The Fund 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 Fund and where appropriate duly implemented.

8. Data Protection

The UK's Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulations. It controls how personal information is used by organisations, businesses and the government. Under the Data Protection Act 2018, everyone responsible for using personal data must follow strict data protection principles. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way which is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing

In addition, organisations have an obligation for better data management and a new regime of fines were introduced for use when an organisation is found to be in breach of data protection regulations. You can obtain further information about these rights from the [Information Commissioner's Office website](#).

Personal data collected / held by the Fund includes:

- Contact details: name, address, telephone number and email address.
- Identifying details: date of birth, national insurance number and employee number and folder reference.
- Assessment information: used to calculate and assess eligibility for benefits, for example length of service or membership and salary information.
- Financial information: relevant to the calculation or payment of benefits, for example bank account and tax details.
- Family information: dependents or personal circumstances, for example marital status and information relevant to the distribution and allocation of benefits payable on death.
- Health information: to assess eligibility for benefits payable on ill health.

- Criminal convictions: if this has resulted in a member owing money to their Employer or the Fund and the Employer or Fund may be reimbursed from the member's benefits.

Employers are under a statutory obligation, as detailed in Regulation 80 of the LGPS Regulations 2013, to provide certain personal data for their members, including (but not exhaustively): the payroll reference number, employment 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 Fund uses members' personal data to:

- Contact members.
- Assess eligibility for pension benefits, to calculate benefits and to provide members (and their beneficiaries upon their death) with benefits.
- Identify members' potential or actual benefit options.
- Allow alternative ways of delivering benefits (for example under a power of attorney).
- Carry out statistical and financial modelling and for reference purposes (for example when the Fund assesses how much money is needed to provide members' benefits)
- Comply with the Fund's legal and regulatory obligations.
- Address queries from members and other beneficiaries and to respond to any actual or potential disputes concerning the Fund.
- Manage the liabilities of the Fund.
- To support the sale, merger or corporate reorganisation or transfer of a business by Employers that participate in the Fund.

Employers must ensure that the personal data supplied to the Fund is correct. The supply of incorrect data (in particular, incorrect contact details) can lead to a data breach. A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. Breaches of personal data can expose the Fund to substantial fines from the Information Commissioner's Office, financial claims from individuals whose personal information has been inappropriately disclosed, and to severe reputational damage.

9. Privacy Notice

The Fund has published a privacy notice in line with the data protection 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 privacy notice is available from the [Fund's website](#).

Appendix 1 – The Employer’s Roles and Responsibilities

The following tables set out in more detail each Employers roles and responsibilities in respect of the administration of the LGPS in the areas of:

- Scheme governance and administration.
- Individual member administration.

The performance standards expected are expressed as targets expected in normal circumstances.

On an exceptional basis, it is accepted that it may not be possible to achieve the target indicated and a pragmatic approach will be adopted. This is subject to Employers using best endeavours to meet expected standards wherever possible.

Scheme Governance and Administration

Function / Task	Performance Target
Employer Contacts	
Confirm nominated representative(s) to the Fund	Within 30 days of Employer joining the fund or change to nominated representative
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 Fund	Notify the Fund within 30 days of becoming a Employer or following the resignation of the current adjudicator
Appoint an independent registered medical practitioner (IRMP) qualified in occupational health medicine and seek approval of the appointment from the Fund for the consideration of all ill-health retirement applications from active and deferred members	Within 30 days of becoming a Employer or within 30 days of a change in IRMP
Employer Discretions Policy	
Formulate and publish 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 within 3 months of becoming a Employer and thereafter within 30 days of any change in policy

Communications	
Distribute any information provided by the Fund to scheme members/potential scheme members including the promotion of Pension Online	Within 10 working days of receipt of the information or as stipulated by the Fund
Ensure that any personal data submitted to the Fund is sent securely	Ensure the security of all data submissions to the Fund at the point of sending
Respond to general queries from the Fund	Within 10 working days from receipt of enquiry unless stated otherwise
<p>Notify the Fund of any notifiable events including, but not restricted to, the following:</p> <ul style="list-style-type: none"> ● Material change in LGPS membership ● Material change in Employer payroll and/or pensionable pay ● Change in Employer's legal status or constitution ● A decision which will restrict the Employer's active membership in the Fund in future ● Any restructuring or other event which could materially affect the membership in the Fund in future ● Confirmation of wrongful trading ● Conviction of senior personnel ● Decision to cease business ● Breach of banking covenant 	Within 10 working days of becoming aware of such an event
Internal Dispute Resolution Procedures (IDRP)	
The Employer's Adjudicator to notify the Fund of the receipt of a Stage 1 IDRP	Within 5 working days of receipt of the appeal
The Employer's Adjudicator to notify the Fund of the decision in respect of a Stage 1 IDRP	Within 5 working days of the decision

The Employer's Adjudicator to provide the Fund with all documentation considered in the determination of the Stage 1 IDRPs for consideration in the adjudication of the IDRPs at Stage 2	Within 5 working days of the receipt of the request from the Fund
Outsourcing / TUPE arrangements	
Notify the Fund of contracting out of services which will involve a TUPE transfer of LGPS eligible staff to another organisation to enable LGPS information to be provided to potential contractors	At the point of deciding to tender
Notify the Fund of the main contacts managing the outsourcing of service provision before and during a contract where a prospective contractor may request to join the Fund	At determination of successful tender
Work with the Fund to arrange for the admission of a contractor as a new employer in the Fund	A minimum of 2 months in advance of the date of contract
Provide the Fund with relevant details, including copies of documentation, of agreements relating to responsibility for an LGPS funding deficit or surplus and requirements for Bond or Guarantor	Within 1 week of the signed contractual agreement with the contractor
Notify the Fund of changes / extension / cessation of arrangements with a contractor	As soon as decision is agreed
Assist the Fund in ensuring that the terms of the contractor's admission as an Employer are complied with	Notify the Fund if the terms of the admission agreement have been breached
Pension Contributions	
Apply the employer contribution rate agreed with the Fund on becoming a Employer and adjust as instructed by the Fund from a date determined by the Fund	Immediately on receipt of information from the Fund effective from a date determined by the Fund following advice from the scheme actuary

<p>Calculate and review the correct employee contribution rate band for all members at commencement and on 1st April each year in accordance with LGPS regulations.</p> <p>Also, to be reviewed at intervals during the year at the employer's discretion</p>	<p>Immediately on commencement, on 1 April each year and as per the Employer's discretionary policy on adjusting the employee's contribution rate at intervals during the year</p>
<p>Ensure the correct application of assumed pensionable pay (APP) during periods of reduced or nil pay</p>	<p>Review of eligibility for APP immediately upon a member moving to reduced / nil pay</p>
<p>Remit employer and employee contributions to the Fund bank account via BACS pursuant to the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014</p>	<p>By 19th of the following month following deduction</p>
<p>Provide monthly contribution schedules which are accurate and complete in the format required to reconcile the employer and employee contributions</p>	<p>By 19th of the following month following deduction</p>
<p>Arrange for the deduction of APCs and payment over to the Fund and the schedule to be sent to the Fund</p>	<p>Payment by 19th of the following month following deduction</p>
<p>Arrange for the deduction of AVCs and payment over to the AVC provider(s) and the schedule to be sent to the Fund</p>	<p>Payment by 19th of the following month following deduction</p>
<p>Notify the Fund of the commencement of AVC and Shared Cost AVC arrangements</p>	<p>Immediately on the commencement of arrangements</p>
Data Returns	
<p>Provide an accurate, fully reconciled and completed year end return in the format set by the Fund</p>	<p>No later than 7 May following the relevant year end</p>

<p>To resolve all queries returned from the year end return</p>	<p>To respond fully to all queries from the Fund within 30 days of receipt of the query.</p> <p>In circumstances where an employer submits a late year end return limiting the Fund's time to complete its duties, the timescales may be reduced, as advised by the Fund</p>
<p>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:</p> <ul style="list-style-type: none"> • Contractual Hours • Remuneration changes • Employee number and/or post number • Absence: maternity, paternity and adoption and unpaid leave of absence and industrial action <p>Each Employer must ensure that this information is available to the Fund if requested</p>	<p>As part of Employer data retention policy</p>
<p>Change of Payroll Provider</p>	
<p>To inform the Fund of a change of payroll provider along with the contact details of the new provider</p>	<p>As soon as possible and no later than 90 days prior to the transfer of duties and functions</p>
<p>Ensure that the Employer provides payroll references (specific to post) to the Fund.</p> <p>This notification should include previous payroll references</p>	<p>As soon as possible but no later than 20 working days before the first data submission</p>
<p>Other Payments</p>	
<p>Make strain payments to the Fund in respect of early payment of benefits from redundancy, business efficiency and flexible retirements or where a member retires early with Employer's consent</p>	<p>Within 30 days of receipt of invoice from the Fund</p>

Payments in respect of all work carried out on behalf of or relating to the Employer by the Fund's actuary including matters connected to funding reviews and data quality assurance undertaken by the Fund	Within 30 days of receipt of invoice from the Fund
Prompt payment of invoices issued by the Fund for specific services provided	Within 30 days of receipt of invoice from the Fund

Individual Member Administration

This section details the functions which relate to scheme member benefits from the LGPS.

New Starters	
<p>LGPS eligible employees must be entered into the scheme from the commencement of their employment, except for employees with a contract of less than 3 months or casual / relief Employees</p> <p>Employees not subject to contractual enrolment must be offered the opportunity to join the LGPS from commencement, or automatically entered upon meeting auto-enrolment criteria</p>	From date of commencement or joining the scheme
<p>Ensure that the correct contribution percentage and banding for member's LGPS contributions is applied to their payroll record and notify the member of the 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</p>	From date of commencement or joining the scheme
<p>Notify the Fund of new scheme joiners via the new starter Bulk Data Interface (BDI)</p> <p>Evidence of an employee's election to join must be retained by the Employer and a copy sent to the Fund</p> <p>If an employee is entered into the LGPS incorrectly, the Employer is responsible for the reimbursement of employee contributions</p>	Within 30 days of member's entry into the scheme via contractual enrolment, auto-enrolment, re-enrolment date or election to join

Changes in Circumstances

Notify the Fund of change, or correction to, employees' personal details: name, address, marital / civil partnership status, date of birth, NI number	Within 30 days of the event or receipt of information
Notify the Fund of changes or corrections in employment details, including changes in hours and moving to or from the 50/50 section	Within 30 days of the event or receipt of information
Notify the Fund of periods of unpaid absence not covered by assumed pensionable pay (APP)	Within 30 days of the event or receipt of information
Notify the Fund where recovery of financial loss is sought from the dismissed employee's pension	Notify the Fund where recovery of financial loss is sought from the dismissed employee's pension

Additional Pension Contributions (APCs)

Ensure members are notified of the option to pay APCs following applicable unpaid absences	Within 10 working days of the return to work
<p>Upon application from a scheme member to purchase lost pension, check the details of the application.</p> <p>If the Employer is in agreement with the APC application, send a counter signed application form to the Fund. The Fund will then review the application and advise if the member requires a medical report before the application is accepted.</p> <p>Once accepted by the Fund apply APCs</p>	Apply to next available payroll and notify fund within 30 days of receipt of members application
Apply APCs on receipt of notification from Fund	Apply to next available payroll
Apply adjustments to APC amounts on notification from Fund	Apply to next available payroll

Additional Voluntary Contributions (AVCs)	
Arrange for the deduction of AVCs from scheme member's pay following notification from AVC Provider	Commence deduction of AVCs on the next available payroll
Optant Outs and 50/50 scheme	
Apply an election to opt out of the LGPS to the member's payroll record	From the 1st of the month for the next available payroll
Apply an election to move to the 50/50 scheme of the LGPS to the member's payroll record	From the 1st of the month for the next available payroll
<p>If the member opts out within 3 months of joining, they are treated as having opted out upon entry and the employer is responsible for refunding the pension contributions.</p> <p>Evidence of an employee's election to opt-out must be retained by the Employer and a copy sent to the Fund</p>	Within 30 days of the opt-out being actioned on payroll
<p>If the member opts out 3 months or more from joining, the Fund will determine if the member is eligible for a refund of pension contributions and contact them directly.</p> <p>Evidence of an employee's election to opt-out must be retained by the Employer and a copy sent to the Fund</p>	Within 30 days of the opt-out being actioned on payroll

Type of Leaver	Function / Task	Performance Target
Leaver Notifications		
Leavers – Over 55	To notify the Fund of the member's leaving date and reason for cessation of membership and all other relevant information on the leaver form	Within 10 working days of leaving date / flexible retirement / opt out

Leavers – Under 55	To notify the Fund of the member's leaving date and reason for cessation of membership and all other relevant information on the leaver form	Within 20 working days of leaving date / opt out
Redundancy / Business Efficiency and Flexible Retirement	Notify the Fund of an Employer decision and authorisation for payment of pension benefits	Within 10 working days of the Employer making the decision
Death in Service	<p>Notify the Fund of the death of an employee who is a scheme member</p> <p>As part of this notification ensure the Fund is provided with next of kin details</p>	Within 3 working days of the Employer being notified of the death of an employee who is a scheme member
III Health Retirements		
Active Members	To determine based on medical evidence and the advice of one of the Fund's approved independent registered medical practitioners (IRMP) whether an ill health award is to be made and determine which tier to apply	No later than 10 working days after Employer decision

Deferred Members	To determine based on medical evidence and the advice of one of the Fund's approved Independent Registered Medical Practitioners (IRMP) whether an ill health award is to be made for the early release of deferred pension benefits on the grounds of ill-health	No later than 10 working days after Employer decision
Tier 3 Reviews	To conduct an 18-month review of tier 3 ill-health retirement awards and interim reviews at other times as requested by the member To notify the Fund of the Employers decision regarding the outcome of the tier 3 ill health review	No later than 10 working days after Employer decision

Function / Task	Performance Target
Scheme Members with a progressive life-limiting condition	
Notify the fund if an employee with LGPS membership has a progressive life-limiting condition	Immediately
Communication with scheme members in respect of formal appeals against pension related decisions	
The Employer's adjudicator to acknowledge receipt of the Stage 1 IDRP	Immediately
Determine appeals against the Employer at Stage 1 of IDRP in accordance with The Local Government Pension Scheme Regulations 2013 (Regs 74 and 75)	Within 2 months of receipt of the appeal Where a decision cannot be reached within 2 months, notify the appellant of reasons for the delay and the date when a decision can be expected to be reached

Appendix 2 – The Fund’s Roles and Responsibilities

Scheme Governance and Administration

This section outlines the responsibilities of the Fund and the performance standards which Employers and scheme members should expect. It is focussed on the activities which involve interaction with Employers and / or scheme members and should not be viewed as an exhaustive list.

Function/Task	Performance Target
Governance – Policies, Strategies and Statements	
Regularly review the Strategy and consult with all Employers	Triennially review the Strategy and in addition review it following any material changes in service delivery or regulations relating to the Strategy and consult with Employers on any changes
The Fund will review the Funding Strategy Statement at each valuation (or material event), following consultation with Employers and the Fund actuary pursuant to regulation 58	Publish by 31 March following the valuation date, or as required
Publish an investment strategy statement pursuant to regulation 7 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016	Triennially review and publish within 30 days of any revision to the policy being agreed by the Pension Fund Committee
Maintain the fund risk register	Quarterly
Review the Fund’s Governance and Compliance Statement pursuant to regulation 55	Triennially review and publish within 30 days of any revision to the policy being agreed by the Pension Fund Committee
The Fund should formulate and publish policies in relation to all areas where the Fund may exercise a discretion within the LGPS	Triennially review and publish within 30 days of any revision to the policy being agreed as above
Governance - Reporting	
Annual report of Fund management and performance, including annual statement of accounts pursuant to regulation 57	By 1 December each year

Publish the Fund's final audited and approved Accounts pursuant to regulation 56	By 31 July following the year-end (or other date as set by Government)
Information for TPR's maintenance of register of pension schemes (including employer details)	Upon receipt of scheme return notice from TPR
Submit a quarterly tax return to HM Treasury and pay the required tax charges	14th day of the second month following the end of the relevant period
Provide information and manage the production of admission, cessation and IAS19/FRS102 (financial statement) reports via the Fund actuary and share with those reports with Employers	As required
<p>Maintain a 'breaches of law' register and notify The Pension Regulator of any materially significant breaches, which may result from:</p> <ul style="list-style-type: none"> • A failure to issue annual benefit statements or pension savings statements in time • Errors and omissions identified by the internal dispute resolution procedure • Employer's failing to pay contributions on time or accurately • Other breaches of a legal requirement 	As soon as practicable
Information relating to pension administration against key performance indicators and employer performance	As required by the Fund and Local Pension Board
Fund Communications to Employers	
Provide Employers with year-end template and guidance	No later than 28th February before the year-end
Maintain and publish all forms required for completion by Employers	Within 30 days of any revision

Notify Employers of changes to key scheme regulations and requirements	Within 30 days of the change(s) coming into effect
Host joint meetings for all Employers, in person or remotely	As required
Provide training for new Employers	All new Employers invited to access training on employer responsibilities within 3 months of joining the scheme
Provide an ongoing programme of refresher or subject specific training or meetings with Employers	As required
Provision of a newsletter / briefing note to Employers	Quarterly
Notify the Employer of issues relating to the Employer's unsatisfactory performance	If no response to the Fund's request for action is received within 10 working days; second request marked "escalation" to be issued, if no response within 10 working 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
Fund Communications with Scheme Members	
Publish and keep up to date all forms required for completion by scheme members or prospective scheme members	Within 30 days of any revision
Management of registrations to the Funds online portal, Pension Online	Within 5 working days of activation key request
Issue annual benefit statements (ABS) to active and deferred members as at 31 March each year (on Pension Online or by post)	By 31 August following year end

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)
Provide payment advice statements to scheme members in receipt of a pension	Payment advice statements are either emailed to members monthly, or sent out via post in March and April each year and where the monthly pension amount changes by at least £5
Provide P60s to scheme members in receipt of a pension	By 31 May following year end
Pension Contributions	
Consult with Employers on the outcome of the periodic Fund valuation	At least 2 months before the issue of the final Rates and Adjustments Certificate
Issue formal valuation results to Employer's following the periodic fund valuation	No later than 1 month before the issue of the final Rates and Adjustments Certificate
Notify new Employers of their contribution requirements	Within 2 months of joining the Fund
Employer Admissions and Cessations	
Process the admission of new Employers into the Fund including signed admission, bond and guarantor agreements where required, and obtaining the Fund actuary's contribution rate / opening funding position report	Within 3 months of date joining the Fund subject to the new Employer providing all relevant information upon request
Arrange where required for Employers who outsource services/functions to undertake, to the satisfaction of the Fund, a risk assessment of the level of bond in order to protect other employers participating in the Fund	To be completed before the body is admitted to the Fund subject to the new Employer providing all relevant information upon request
Undertake a review of bonds or indemnity required to protect other Employers participating in the Fund	Annually, or 3 months prior to bond expiry as necessary

Carry out valuation assessments on cessation of admission agreements or a Employer ceasing participation in the Fund	<p>Within 2 months of a cessation, subject to the Employer providing all relevant information upon request</p> <p>Where a cessation valuation reports a surplus position at the point of exit, the determination and payment of the exit credit to be completed within 6 months of the exit date</p>
Pensioner Payroll	
Ensure payment of monthly pensions to pensioner and dependant pensioner scheme members	On the last Thursday of each calendar month.
Miscellaneous	
Calculate pensionable pay and determine a scheme member's final pay, when required	This is a Employer function by default, however, the Fund will calculate this on behalf of Employer's, unless an Employer wishes to do so themselves

Individual Member Administration

This section details the Fund's functions which specifically relate to the administration and processing of scheme member benefits from the LGPS.

Function/Task	Performance Target
General Enquiries	
Acknowledge to written or verbal enquiries from Employers and scheme members or their representatives or dependents and other authorised persons	Within 5 working days from receipt of an enquiry
Respond to written or verbal enquiries from Employers and scheme members or their representatives or dependents and other authorised persons	Within 10 working days from receipt of an enquiry

Change of scheme member personal details including but not limited to: <ul style="list-style-type: none"> ● Change of surname ● Change of address ● Change of marital status ● Change of bank details ● Update death grant nomination 	Within 10 working days from receipt of all required information
Implementation of a power of attorney / court of protection order	Within 10 working days from receipt of all required information
New Scheme Joiners and 50/50 Elections	
Set up a new starter pension record and provide the statutory notification to the member	Within 30 days of the Bulk Data Interface (BDI) notification and all other required information
Move member to the 50/50 section of the LGPS	Within 30 days of the notification and all other required information
Aggregations, Transfers and Estimates	
Issue statement to scheme member relating to the aggregation of previous LGPS membership	Within 20 working days of receipt of all necessary information
Commencement of transfer-in requests	Within 10 working days of receiving transfer details from sending scheme
Completion of transfer-in applications	Information provided within 30 days of receipt of all required information
Transfer-out quotations issued	Within 15 working days of the date of request
Transfer out payments processed and notification to scheme member	If transfer out finalised within 3-month guarantee period, payment made within 30 days of guarantee date
Cash equivalent transfer value (CETV) estimates for divorce purposes	Within 20 working days of request and receipt of all necessary information
Implementation of a pension sharing order	Within 10 working days of receipt of court approved pension sharing order

Provide requested estimates of benefits to scheme members	<p>Within 20 working days of receipt of all required information.</p> <p>If the member holds additional voluntary contributions (AVCs) within 20 working days of confirmation of the members fund valuation.</p> <p>Please note we will only provide members one estimate within a 12 month period</p>
Provide requested estimates of benefits to Employers including strain costs in relation to the early payment of benefits due to redundancy or business efficiency	<p>Within 20 working days of receiving all required information from the employer. Bulk requests of more than 10 estimates per month will be subject to prior agreement between the Fund and the Employer</p>
Additional Contributions	
Notify the Employer of any scheme member's election to purchase additional pension contributions (APCs), including all required information to enable deductions to commence	<p>Within 10 working days of receipt of election from scheme member to meet the employer's next available payroll</p>
Notify the Employer of any scheme member's election to purchase, amend or cease additional voluntary contributions (AVCs), including all required information to enable the change	<p>Within 10 working days of receipt of election from scheme member to meet the Employer's next available payroll</p>
Deferred Benefits / Refund of Pension Contributions	
Notify member of deferred benefits options	<p>Within 30 working days of date of leaver Notification</p>
Notify member of deferred refund benefits options	<p>Within 30 working days of date of leaver Notification</p>
Process refund payments	<p>Within 10 working days of all completed forms</p>
Retirements	
Provision of retirement options letters detailing member options	<p>Within 20 working days of request or receipt of leaver notification</p>

Process of retirement benefits, including deferred benefits, for payment following receipt of a request to access benefits	<p>Within 10 working days of the quoted retirement date or the Fund receiving all completed forms/documents</p> <p>Lump sum to be paid within 10 working days of quoted retirement date or the Fund receiving all completed forms/documents</p> <p>Pension to be paid from the Fund's next available Payroll</p>
Deaths	
Notification to dependants of their death benefits	Within 10 working days of notification along with all required information
Processing of beneficiaries' pensions for payment	Within 10 working days of completed forms and documents
Processing of death grant for payment	Within 10 working days of completed forms and documents
Appeals	
Acknowledge receipt of Stage 2 IDR appeal	Within 1 week of receipt of Stage 2 IDR appeal
Decide adjudicator for completion of the Stage 2 determination	Within 1 week of receipt of Stage 2 IDR appeal
Prepare information and evidence as required for adjudicator to consider Stage 2 appeal	Within 2 months of receipt of the application, or such longer time as is required to process the application where further information or clarification is required
Ensure the issue of a formal letter to the appellant following the adjudicator's determination of the Stage 2 Application	Within 1 week of the adjudicator's decision

The timescales for completing the tasks above are measured from the date the Fund is in receipt of all the relevant information required to complete the task and is expressed in working days unless stated otherwise.

Appendix 3 - Recoverable additional costs

The standard cost of administering the fund is factored into the contribution rates but there are circumstances that will require the recovery of additional costs.

Any such costs will be monitored by the Fund and the relevant party will be invoiced for payment, either annually or on an ad-hoc basis depending on the type of cost.

Performance penalties

This type of recovery is dealt with according to [regulation 70](#), which allows the Fund to levy such charges on account of an Employer's unsatisfactory performance in carrying out its functions. These recoveries are required as a penalty to ensure the smooth running of the LGPS.

The penalties will be calculated as follows:

Reason for Charge / Fine	Level of Charge (£)
Administration Charges / Fines	
Late payment of Employer and / or scheme member contributions. Plus, any statutory charges	£150 per occurrence plus interest as defined in Regulation 71 of LGPS Regulations 2013
Late submission of monthly contributions schedule	£150 per occurrence plus £25 per working day
Late provision of year end contributions returns in prescribed format	£1,000 plus £100 for each working week plus part week of continued non-provision
Incorrect submission of year end data resulting in a resubmission or manual intervention (An "incorrect" file means a file with an error rate greater than 5%)	£150 per occurrence
Failure to respond to the Fund's year end data query requests within 10 working days	£50 per occurrence then £25 for every further 10 working days the information remains outstanding
Late provision of starter information	£50 per scheme member

Failure to notify the Fund 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 scheme member
Late provision of leaver information	£50 per scheme member. If the late provision of leaver information generates additional cost for the fund this additional cost may also be recharged to an Employer
Charges for persistent incorrect and incomplete information provided by the Employer to the Fund (where the case has to be returned for incorrect information on more than 2 occasions)	£50 per occurrence
Governance Charges / Fines	
Failure to notify the Fund of a change to the Employers "nominated representative" contact information within 1 month of alteration	Reminders 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 Fund of a contracting out involving a TUPE transfer of staff eligible for LGPS membership before the transfer date. Failure to inform the Fund of a new Academy or Free School before their opening date	£500 per occurrence
No response (or inaccurate response) to queries and reminders raised by the Fund for information needed to perform a benefit calculation	£50 per occurrence
No response to the Fund request for LGPS discretions statement	£25 per reminder letter

Third Party Charges / Fines	
Fine from The Pensions Regulator	Amount determined by The Pensions Regulator
Fine from The Pensions Ombudsman (including “distress and inconvenience” payments suggested by the Early Resolution Service)	Amount determined by The Pensions Ombudsman
Delay causing unauthorised payments	Cost of tax from the HM Revenue & Customs (“HMRC”) and or reimbursement of charges imposed by HMRC on the Fund
Fines from any other statutory body incurred due to the employer’s actions	As levied

Underperformance charges will apply at the discretion of the Head of the Fund and will be calculated based on a combination of the standard tariff of charges plus time spent at the daily rate outlined below.

Charges for ‘time spent’ on underperformance issues will be made on a half day basis. For less than a quarter of a day, no charge will be made. For more than half a day, the full day charge will be made.

Time Spent - Officer Charges

Summary of officer charges for time spent on cases triggered by Employer underperformance:

	Charge levels		
Time Taken	Level 1 (Work at Pensions Assistant and Pensions Officer Level)	Level 2 (Work at Senior Pension Officer and Team Leader Level)	Level 3 (Work at Pension Administration Manager / Head of Pension Fund Level)
Daily	£180	£250	£450
Half Day	£90	£125	£225

Where the Fund 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 Strategy.

Actuarial and other fees

Any requests for advice or work that is outside of the requirements of a Fund as defined by the LGPS regulations will be recoverable from the relevant Employer or scheme member.

This may include:

- Legal advice concerning admission or cessation.
- Accounting valuation reports (FRS102, etc).
- Site visits or seminars.

Such recoveries will recharge the cost incurred from the third party provider with no uplift or administration fee. If the work is to be undertaken by the Fund itself, the fees will be agreed with the Employer or scheme member before work commences.

Strain costs

Pension strain costs can occur in a number of situations. Depending on the situation, the Employer may be liable for the costs or the costs will be paid from the Fund (the Employer's contribution rates include an element to cover these risks). The typical situations are as follows:

Type of Strain Cost	Who is responsible for payment?
Death	Fund
Ill health retirement	Employer (excluding Sutton Council)
Redundancy of scheme member over the age of 55	Employer
Retirement of an employee over the age of 55 on grounds of efficiency or where the Employer chooses to waive the actuarial reduction that would otherwise apply	Employer

Appendix 4 - Communication statement

This statement has been developed in accordance with [Regulation 61](#) of the Local Government Pension Scheme Regulations 2013 (Regulation 61) and takes into account guidance from The Pensions Regulator.

Regulation 61 requires that the statement covers:

- the provision of information and publicity about the Local Government Pension Scheme (LGPS) to scheme members, representatives of scheme members and Employers
- the format, frequency, and method of distributing such information or publicity
- the promotion of the LGPS to prospective scheme members and Employers

1. Objectives

The Fund's overriding objective is to ensure that it delivers clear, timely and accessible communications to its stakeholders. The Fund aims to achieve this by delivering communications to its stakeholders which are:

- **Targeted** - with the aim of delivering clear, accurate and effective communications to each different audience group, in terms of the style of content and the method of delivery.
- **Easy to understand** - providing clear and easy to follow explanations of pension issues, particularly where pension related decisions are being made.
- **Accessible** - ensuring that all scheme members and other stakeholders can access the Fund's services, online content, and communications equally.
- **Cost effective** – providing value for money by utilising technology to its fullest potential.

By communicating in this way, the Fund aims to:

- Communicate information about the Scheme's rules and regulations in an effective, jargonfree, and timely manner to the different groups of customers and stakeholders to enable them to make fully informed pensions decisions
- Keep members, Employers and other stakeholders informed about the management and administration of the Fund
- Keep members, Employers and other stakeholders informed about the Fund's investment portfolio
- Consult with key stakeholders on changes to policies and procedures that affect the Fund and its stakeholders
- Seek to continually improve the Fund's communication methods by requesting and analysing feedback

- Inform customers and stakeholders to enable them to make the decisions regarding pension matters.
- Work with Employers to enable them to fulfil their responsibility to communicate and share information with members in relation to the Scheme
- Enable equality of access to Fund communications
- Manage information securely to the standards required by the Data Protection Act 2018

2. Communication Methods

The statement will set out the channels of communication that will be communicated and their frequency.

Pensions Online

We are committed to using technology to enhance services, improve accessibility and broaden inclusion. We are developing our use of digital communication through our secure member portal, [Pensions Online](#). Members can access their pension account using the My Pension area of the website. This is a secure area that allows members to see the personal details we hold about them. They can also update information such as their death grant nomination and use a calculator to estimate their retirement benefits.

Wherever possible, we will use a digital first means of communication, however, we recognise that individuals may have specific needs with regards to the format or language of our communication. As such, reasonable alternative material will always be made available on request.

Annual benefit statements are published on [Pensions Online](#) by 31 August and unless requested, a scheme member will not receive a paper copy. Using [Pensions Online](#), active and deferred scheme members can view their statements, other documents and membership information.

Sutton Council Website

We shall maintain the Fund's web page on the [Sutton Council's website](#) to provide information about the LGPS. The website has been designed to be easily browsed, accessible and user friendly from desktop, laptop, tablet and smartphone devices and the contents shall be reviewed at least twice per year. This is where we will publish the key scheme documents, such as the annual accounts, policies and other statements.

As well as key scheme documents, the website contains downloadable forms and factsheets for members on a range of topics, including the Scheme guide, Additional Voluntary Contributions (AVCs), transfers etc. The web pages will not duplicate the core scheme information found on the [LGPS website](#) but rather link to it where possible and only add information that is specific to the Fund.

When it is prudent to share scheme updates to scheme members, these messages will be added to the Council website. These updates may include changes to the scheme regulations.

Email Communications

The Fund maintains secure email inboxes used by members and Employers for the submission of general and individual enquiries, the provision of information and other directed information. The details of each inbox and their purpose is explained in the following table:

Email Address	Purpose
skpensions@sutton.gov.uk	A general inbox for enquiries from members.
skemployers@sutton.gov.uk	For Employers to submit: <ul style="list-style-type: none">• forms and other information relating to individual members.• data returns, contribution payment reports and other payment and data based enquiries.• queries relating to LGPS regulations, communications, Employer training, all Fund events.

We will send emails to all members who have registered for Pension Online to alert them to any key updates made to the LGPS or their pensions.

Telephone Enquiries

The Fund has a dedicated Pensions Helpline number (020 8770 5290). The Helpline is currently available Monday to Friday 1.00pm to 5.00pm.

Post

You can write to the Fund at: Shared Pension Administration Service, Civic Offices, St Nicholas Way, Sutton SM1 1EA.

3. Communication to Members

Active and Deferred Members

On joining the Fund, new active members are provided with:

- confirmation of their LGPS membership
- a link to the LGPS information on the website
- forms and information to enable them to request a transfer-in of any previous eligible pensionable service

Each year, the Fund provides annual benefit statements to all active and deferred members. These statements summarise a member's pension account balance to the previous 31 March. These statements are currently uploaded to Pension Online. The provision of these statements is subject to Employers providing timely year end information to the Fund.

Pensioner Members

The Fund email payment advice slips and P60s to pensioner and dependant pensioner members, however, members can opt to receive their payment advice slips and P60s by post.

The Fund participates in the National Fraud Initiative and may share information with other bodies responsible for auditing or administering public funds for the purpose of preventing and detecting fraud.

Life certificates, or an alternative secure electronic solution, are delivered each year by the Fund, or by a specialist tracing service working on behalf of the Fund, to pensioners living abroad to ensure that they maintain eligibility for their pension benefits. The aim of the Life Certificate is to reduce the liabilities which result from pension overpayments following the death of pensioner members living overseas. The Fund's arrangements for the issue and delivery of Life Certificates or a secure electronic alternative are reviewed regularly.

4. Communications to Prospective members

We do not have details of prospective members of the scheme therefore communication with this group takes place via Employers. Employers are supported in promoting the scheme to all their eligible employees and information is provided to Employers to signpost their employees to the [LGPS website](#) to highlight the benefits of LGPS membership.

5. Communications to Employers

This Strategy aims to promote good working relationships between the Fund and its Employers in order to support the delivery of a high-quality service to members. It sets out clearly the standards of performance and best practice that the Fund and its Employers should aim to meet when carrying out their LGPS related functions and responsibilities.

Employer Forums

Face to face Employer events are provided when it is appropriate to do so; some are aimed at all Employers and others targeted at specific groups, such as academies.

During an actuarial valuation year, we shall hold meetings with Employers and the fund actuary to discuss the results and implications of the valuation and other actuarial matters.

Employer Training

Employer training is currently carried out as requested. It is conducted through individual meetings with Employers via Google Meet.

Employers are kept up to date with developments which impact on their application of the LGPS regulations by Employer newsletters, which are emailed to nominated Employer contacts. At least one Employer newsletter is produced each quarter.

6. Accessibility

The Fund aims to ensure that all members can equally access its services, online content and communications, and is committed to increasing digital access and delivery of services making the best use of technology.

The Fund's website is designed to ensure that new content meets the World Wide Web Consortium Accessibility Guidelines (version 2.1 AA standard), which is currently the recommended minimum standard for all council hosted websites. Alternative methods of communications will continue to be offered as required.

The LGPS and other pension schemes can prove confusing to its members. As such, all communication sent by us will be written using plain language where possible and where not, will include suitable definitions.

7. Local Pension Board and Pension Committee

The Local Pension Board assists the Fund in complying with LGPS governance and administration responsibilities and complying with the relevant requirements of The Pensions Regulator. Staff members of the Fund work closely with the Pension Board, attending meetings which are held at least quarterly, and ensuring that they have the information necessary to fulfil their duties and responsibilities. Information about the Pension Board and summaries of Pension Board meetings are published on the [Council's website](#).

The Pension Committee is responsible for the management and administration of the Fund on behalf of the Fund. Members of the Fund's team work closely with the Chair, Deputy Chair and Members of the Committee to ensure that they are fully informed about Fund matters and that they are fully supported in fulfilling their duties and responsibilities. Members of the Committee receive reports from Fund officers on matters to be determined or reviewed. Minutes of meetings (except for restricted items) are available from the [Council's website](#).

8. Sharing information with external bodies

From time to time the Fund may share scheme member and Employer information with the following external bodies:

- Scheme Members (including their authorised representatives)
- Prospective scheme members
- Cabinet Office
- Ministry of Housing, Communities & Local Government (MHCLG)
- Department for Work & Pensions (DWP)
- Government Actuary's Department (GAD)
- HM Revenue & Customs (HMRC)
- Local Government Association (LGA)
- The fund actuary (Barnett Waddingham LLP and Hymans Robertson LLP)
- The external auditor (KPMG LLP)
- The member data service provider (Accurate Data Service)
- The Pension Regulator (TPR)
- The Pensions Ombudsman (TPO)
- The Scheme Advisory Board (SAB)
- Trade Unions
- Other LGPS Funds
- Other Public Sector Pension Schemes (e.g. Teachers Pensions and NHS Pension Scheme)
- AVC Providers