

Report for: ACTION
Item Number: 12



Contains Confidential or Exempt Information	NO - Part I
Title	Pension Administration Strategy
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Member reporting	n/a
For Consideration By	Berkshire Pension Fund Board
Date to be Considered	26 November 2015
Implementation Date if Not Called In	n/a
Affected Wards	None
Keywords/Index	<i>Insert relevant key words</i>

Report Summary

This report deals with a revised and updated Pension Administration Strategy produced in accordance with Regulation 59 of the LGPS Regulations 2013 (as amended).

If recommendations are adopted, how will residents, fund members and other stakeholders benefit?

Benefits to residents, fund members and other stakeholders and reasons why they will benefit	Dates by which they can expect to notice a difference
1. Better governance and administration of the Pension Fund	Ongoing

1. Details of Recommendations

The Pension Administration Strategy has been prepared by the administering authority to support its strategic aim in providing the most efficient and cost effective service to Scheme members.

RECOMMENDATION: That Pension Board members approve the Pension Administration Strategy.

2. Reason for Recommendation(s) and Options Considered

The Royal Borough of Windsor and Maidenhead has prepared a Pension Administration Strategy in accordance with Regulation 59 of the LGPS Regulations 2013 (as amended). Whilst that regulation does not place a compulsion upon an administering authority to prepare and publish such a statement the administering authority's strategy is to adopt the highest possible standards of governance and administration in order to achieve the most efficient and cost effective means by which to deliver the best possible service to Scheme members and so such a strategy is deemed to be necessary.

The Pension Administration Strategy should be seen as a road map to success which sets out how the strategic aims of the administering authority can be achieved by working in partnership with its key stakeholders (Scheme members and Scheme employers).

The Pension Fund is seeking the approval of the strategy document in order to support officers in formulating and delivering to scheme employers, training with regard to their statutory obligations under scheme regulations.

The Pension Administration Strategy must be considered and referred to by both the administering authority and scheme employers when carrying out their administrative duties. Once approved, the Pension Administration Strategy will be circulated to Scheme employers for a period of consultation designed to run alongside the proposed scheme employer training.

3. Key Implications

Failure to meet the standards set out in the Pension Administration Strategy could have significant implications for the administering authority (Scheme Manager) and its Scheme employers. The Pensions Regulator has published a 'Compliance and Enforcement Policy for Public Service Pension Schemes' which can in the worst case scenario lead to fines being imposed for poor performance.

4. Financial Details

There are no direct financial implications in agreeing to this Pension Administration Strategy.

5. Legal Implications

None.

6. Value For Money

Not applicable.

7. Sustainability Impact Appraisal

There are no known implications.

8. Risk Management

The adoption of a Pension Administration Strategy with mitigate a certain amount of risk in particular the potential intervention of the Pensions Regulator where poor performance

9. Links to Strategic Objectives

Linked to the strategic objectives of the Pension Fund in accordance with overriding regulations.

10. Equalities, Human Rights and Community Cohesion

There are no known implications.

11. Staffing/Workforce and Accommodation implications:

None.

12. Property and Assets

None.

13. Any other implications:

None.

14. Consultation

Once approved the Pension Administration Strategy will be circulated to all Scheme employers for their comment.

15. Timetable for Implementation

To be implemented following completion of consultation period and all employer training.

16. Appendices

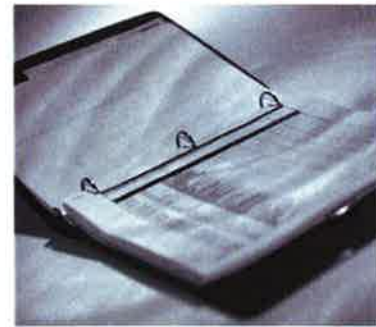
See attached Pension Administration Strategy.
Pension Regulator's compliance and enforcement policy for public service pension schemes.

17. Background Information

Local Government Pension Scheme Regulations 2013 (as amended), the Pensions Regulator's

Report History

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PENSION ADMINISTRATION STRATEGY

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INTRODUCTION

This Pension Administration Strategy has been prepared by the Royal Borough of Windsor and Maidenhead as the Administering Authority to the Royal County of Berkshire Pension Fund in accordance with Regulation 59 of the Local Government Pension Scheme Regulations 2013 and sets out the strategic aims of the Administering Authority with regard to how the LGPS should be governed and administered in Berkshire.

The Administering Authority will keep this strategy under review and make revisions as are appropriate following a material change in any of the matters contained in the strategy.

In preparing, reviewing or making revisions to this strategy, the Administering Authority will consult with its Scheme employers and publish the strategy statement to each Scheme employer and to the Secretary of State.

The Administering Authority and its Scheme employers must have regard to this pension administration strategy when carrying out their Scheme functions, including those functions carried out by the Administering Authority in its capacity as a Scheme employer.



The aim of this strategy is to set out a road map as to how the highest standards of administration can be achieved by adopting the most efficient and cost effective practices thereby ensuring a consistent approach to pensions administration across all Scheme employers in partnership with the Berkshire Pension Fund so that all Scheme members ultimately receive the highest standard of service in the most efficient and effective manner possible.

MATTERS TO BE CONSIDERED

All of the following matters are to be considered to ensure that the aims of this administration strategy are achieved.

Procedures for liaison and communication...

...between the Administering Authority and its Scheme employers with the aim of clarifying the roles and responsibilities of both the Administering Authority and the Scheme employers in administering the LGPS.

Establishment of levels of performance...

...that both the Administering Authority and its Scheme employers are expected to achieve including the setting of performance targets, the making of agreements about levels of performance and associated matters and such other matters as the Administering Authority considers appropriate.

Compliance with statutory requirements...

...setting out clear procedures which aim to secure that the Administering Authority and its Scheme employers comply with those statutory requirements and with any agreement about levels of performance.

Procedures for improving the flow of communication...

...between the Administering Authority and its Scheme employers to enable the Scheme functions to be carried out effectively and efficiently.

Circumstances for issuing notices of underperformance...

...under Regulation 70 of the Local Government Pension Scheme Regulations 2013 (*Additional costs arising from Scheme employer's level of performance*) on account of the Administering Authority considering that a Scheme employer's performance in carrying out its Scheme functions has been unsatisfactory and associated matters as considered appropriate.



Procedures for producing performance statistics...

...and the publication of an annual report dealing with the extent to which the Administering Authority and its Scheme employers have achieved the levels of performance established.

Production of a Pension Administration Service Level Agreement (SLA)...

...setting out the various responsibilities of the Administering Authority and the Scheme employer with workflows being monitored and findings reported to the Berkshire Pension Fund Panel, Pension Fund Advisory Panel and Pension Board as part of a Stewardship report.

In addition to the above the Administering Authority has power to consider any other matters that it believes to be appropriate for inclusion in this strategy and will consult with its Scheme employers and such other persons as required.

LIAISON AND COMMUNICATION



Pension administration relies largely on information supplied to the Administering Authority by its Scheme employers. The pension administration team can be contacted at any time during normal office hours on 0845 602 7237 although direct dial numbers are provided to all Scheme employers. An office helpdesk is also available at:

info@berkshirerpensions.org.uk

Each Scheme employer must nominate a pension liaison officer to deal with initial enquiries received from the Administering Authority. If preferred a number of officers can be nominated (up to a maximum of 4) by the Scheme employer in Appendix A to the Pension Administration Service Level Agreement, provided that their specific responsibilities are identified (e.g. HR or payroll; formulating policy statements; ensuring payment of monthly contributions and

submitting returns). The Scheme employer will inform the Administering Authority immediately if these details are amended in anyway.

The Scheme employer will provide the following details in respect of their pension liaison officer(s):

- Name;
- Position;
- Direct Telephone Number (if direct dial is available);
- Email contact details;
- Business address;
- Specific responsibilities of each officer (if more than one has been nominated).

The Administering Authority will maintain a schedule of pension liaison officers and ensure that all staff concerned with pension administration use the contact details provided by the Scheme employer.

The Administering Authority will maintain a Pension Fund website with a dedicated Scheme employer area. This will include (but is not limited to):

- General guidance and information on procedures for administering the Local Government Pension Scheme;
- Employer bulletins (*'Inscribe'*) used to communicate current issues pertaining to the Scheme;
- Copies of all standard forms (on-line where possible) to be used by Scheme employers when providing information to the pension administration team;
- Copies of all publications issued by the Administering Authority including newsletters, scheme guides and factsheets;
- A link to the LGPS Regulations, LGA Circulars, DCLG Guidance and consultation documents.



The Administering Authority will hold quarterly meetings with the pension liaison officers of the six Unitary Authorities to discuss current pension issues and administration procedures. An annual meeting will be held to which all Scheme employers will be invited in accordance with the Administering Authority's 'Statement of Policy Concerning Communications'.

Further details regarding communications between the Administering Authority and its Scheme employers are contained within the Royal County of Berkshire Pension Fund's 'Statement of Policy Concerning Communications'.

LEVELS OF PERFORMANCE

The Administering Authority has a number of service standards that it publishes to Scheme members. From these service standards a number of performance targets are set and need to be maintained.

The pension administration team works to a number of Key Performance Indicators (KPIs) that are reported to the Berkshire Pension Fund Panel, Pension Fund Advisory Panel and Pension Board as part of a Stewardship report.

The 4 main KPIs to be achieved are:

1 - Setting up a new member record on the pension administration system and produce an on-line membership certificate within 20 working days of receipt of all relevant information from the Scheme employer.

2 - Calculating leaver benefits and notifying members of their rights upon termination of pensionable employment within 20 working days of receipt of all relevant information from the Scheme employer.

3 - Calculating retirement benefits and notifying members of their benefit options within 5 working days of receipt of all relevant information from the Scheme employer

4 - Making payment of a retirement lump sum to a member within 30 calendar days of their retirement date subject to all relevant information having been received from the Scheme employer and the Scheme member.



The Administering Authority will consult with its Scheme employers if the KPIs are amended in anyway.

Many of the targets to be met by the pension administration team rely on the receipt of accurate data as supplied by Scheme employers. A key strategic aim of the Administering Authority is to ensure that pension data is accurate and up to date at all times thereby meeting all of the statutory requirements laid down in regulation and the standards set out in the Pensions Regulator's codes of practice. The Administering Authority is committed to working with Scheme employers to ensure that levels of performance meet the highest standards possible. In order to achieve this, the Administering Authority's strategy is to receive, send and provide data in an electronic format that is compliant with all Data Protection and Data Security requirements.

The level of performance of both the Administering Authority and Scheme employers will be continually scrutinised and reported to the Berkshire Pension Fund Panel, Pension Fund Advisory Panel and Pension Board. Where performance levels fall below expected targets steps will be taken to resolve the issues and if considered to be of a material significance, reported to The Pensions Regulator.

STATUTORY REQUIREMENTS

A number of statutory requirements are made by the Scheme regulations. For the purpose of this strategy statement the key requirements are detailed in this section of the strategy.

Each Scheme employer is required to produce, publish and maintain a statement of policy regarding the exercise of certain discretionary functions available to them in accordance with Regulation 60 of the Local Government Pension Scheme Regulations 2013 and Schedule 2 of the LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014. This policy statement must be kept under review and where revisions are made, the revised policy statement must be published before the expiry of one month from the effective date of revision. A copy of the policy statement must be sent to the Administering Authority.

Each Scheme employer must specify the name, job title, address and telephone/e-mail contact details of a person to whom applications under Stage 1 of the Internal Disputes Resolution Procedures should be made. When an amendment to these details is made, a notification of the change must be sent to the Administering Authority immediately.



Each Scheme employer must determine the rate at which its employees should contribute to the Scheme with effect from 1 April each year and where an employee holds more than one post, the rate applicable to each post. Where there is a material change to a member's pensionable pay in the course of a financial year, the employer may re-determine the contribution rate to be applied.

Each Scheme employer must pay to the Administering Authority all contributions deducted from the pay of its scheme members and the respective employer contributions. Payment must be made no later than the 19th of the month following the period for which the pension contributions have been deducted and (unless contribution data has been submitted on a monthly basis via i-Connect) a breakdown of the contributions between employee standard contributions, employee additional contribution and employer contributions, along with other supporting information, must be submitted to the Pension Fund at the same time.

Following the end of each financial year, a Scheme employer must (unless they have already submitted this data over the course of the year via i-Connect) submit a schedule to the Administering Authority, by 30th April, giving full and accurate data in the format determined by the Administering Authority in respect of each of their scheme members (and each post that their scheme members may hold).



Each Scheme employer must pay to the Administering Authority any charge identified by the Administering Authority as a result of the Scheme employer's decision to release any pension benefits prior to a member's normal retirement age (capital or strain cost). Such payments should be made within 21 calendar days from the date that the invoice is raised and issued by the Administering Authority.

Each Scheme employer must also pay to the Administering Authority any charge identified by the Administering Authority as a result of the Scheme employer's decision to award any additional benefits to a scheme member in accordance with its statement of policy regarding the exercise of certain discretionary functions. Such payments should be made within 21 calendar days from the date that the invoice is raised and issued by the Administering Authority.

IMPROVING THE FLOW OF COMMUNICATION

The Administering Authority is committed to the ongoing improvement in communication with its Scheme employers and Scheme members. The Administering Authority has produced a 'Statement of Policy Concerning Communications' which is available from the Pension Fund website www.berkshirerensions.org.uk.

For the purposes of this pension administration strategy the Administering Authority has a number of strategic aims for improving communication with Scheme employers. One area

that the Administering Authority is particularly keen to focus on is ensuring the highest standards of administration are maintained by having the most efficient and effective processes by which pension data is submitted by Scheme employers to the Administering Authority. One of the Administering Authority's key strategic aims is to work with Scheme employers in implementing and using i-Connect, a secure automatic data transfer system, as the method by which pension data is transferred between the Scheme employer and the Administering Authority.

i-Connect provides many benefits for both the Scheme employer and the pension fund that support the Administering Authority's strategic aims for improving levels of performance:

- Data is encrypted and submitted in real time on each occasion that a payroll is run meaning that, not only is data transmitted securely, Scheme members have instant access to the most up to date membership information;
- The need for Scheme employers to complete paper forms, spreadsheets and year end returns is removed;
- All membership data is submitted at the correct time thereby ensuring that no data is missing and eliminating the risk of data inputting errors;
- All data protection requirements are met and security risks are significantly reduced;
- Instant reconciliation of Scheme contribution payments;
- Addresses auto-enrolment obligations thereby minimising the risk of fines from the Pensions Regulator;
- Automatically maintains membership data in line with the requirements set out in Record-Keeping regulations and to the standard required by the Pensions Regulator.

Other key strategic aims of the Administering Authority are to:

- Provide Scheme employers with access to an Employer Self-Service (ESS) facility giving them access, through a secure link, to member data in respect of their own employees who are currently or have previously been members of the LGPS;
- Provide Scheme employers with training sessions to assist in understanding not only complex pension legislation but also procedures and processes to be adopted by Scheme employers with regard to their statutory responsibilities;
- Maintain a dedicated Scheme employers section on the Berkshire Pension Fund website and continue to develop on-line forms and administration guides;
- Provide direct dial numbers for all officers connected with the Pension Fund and not operate an automated telephony service;
- Commit to attending meetings with Scheme employers (or groups of Scheme employers) at their offices (or at a nearby location) to discuss all LGPS-related matters as set out in an agenda agreed between the Scheme employer (or employers as the case may be) and the Administering Authority;
- Have Scheme employers represented at meetings of the Pension Board by a number of appointed Scheme employer representatives. All Scheme employers will be encouraged to raise any issues with the Pension Fund through the Pension Board, the results of which will be circulated to all Scheme employers for reference or action.

WRITTEN NOTICE OF UNSATISFACTORY PERFORMANCE

In accordance with Regulation 59(2)(e) of the Local Government Pension Scheme Regulations 2013, an Administering Authority has to consider the circumstances in which it may give a written notice to any of its Scheme employers under Regulation 70 of those Regulations (additional costs arising from Scheme employer's level of performance), on account of the Scheme employer's unsatisfactory performance in carrying out its Scheme functions when measured against levels of performance established in accordance with this pension administration strategy and associated pension administration service level agreement.

The following are circumstances upon which the Administering Authority will issue written notices of unsatisfactory performance:

- Where, in the opinion of the Administering Authority, it has incurred additional costs as a result of a Scheme employer's unsatisfactory performance the Administering Authority will give a written notice to the Scheme employer setting out the reasons for forming its opinion, the amount the Administering Authority has determined the Scheme employer should pay in accordance with Regulation 69(1)(d) and the basis upon which the amount has been calculated;
- Where a Scheme employer fails to make payment of employee and employer contributions by the 19th of the month following the period in relation to which the contributions were deducted;
- Where a Scheme employer persistently fails to provide the necessary documentation in support of the contribution payment;
- Where a Scheme employer has failed to settle an invoice for any additional costs arising as a result of their early retirement decisions within the prescribed 21-day deadline;
- Where a Scheme employer has failed to notify the Administering Authority that one of its employees has become entitled to the release of their pension benefits and, as a result of which, payment of any lump sum is made later than 30 calendar days from the date that pension benefits become payable;



Governance and administration of public service pension schemes

On each occasion that any notice of unsatisfactory performance is issued it will be included in a Stewardship report presented at meetings of the Berkshire Pension Fund Panel, Pension Fund Advisory Panel and Pension Board.

Where the Pension Fund has become liable to pay interest due to the unsatisfactory performance of a Scheme employer consideration will be given to charging that interest payment to the appropriate Scheme employer.

Interest will be calculated in accordance with Regulation 71 of the Local Government Pension Scheme Regulations 2013 (one per cent above base rate on a day to day basis from the due date to the date of payment and compounded with three-monthly rests).

The Administering Authority will always assist the Scheme employer to resolve any issues but where persistent failure by a Scheme employer to meet payment deadlines can be evidenced,

or where a Scheme employer continually fails to meet statutory requirements and/or the performance standards set out in the pension administration service level agreement, further consideration will be given to whether or not that Scheme employer should be reported to the Pensions Regulator in line with Code of Practice number 14, 'Governance and Administration of Public Service Pension Schemes'.

PERFORMANCE STATISTICS AND REPORTS

Performance statistics will be produced in respect of both the Administering Authority and the Scheme employers and performance levels monitored closely.

The Administering Authority will keep records of the performance of each Scheme employer on an ongoing basis and report back to the Scheme employer as part of any meeting scheduled between the two parties.

The Administering Authority will produce and publish an annual performance report that will be made available to all Scheme employers. This will be published on the Royal County of Berkshire Pension Fund website and will include the KPIs for the pension administration team.

The Administering Authority will proactively assist Scheme employers who under-perform to improve their future performance.

Performance statistics to be recorded in respect of Scheme employers and reported to the Berkshire Pension Fund Panel, Pension Fund Advisory Panel and Pension Board as part of a Stewardship will include:

- All instances where a written notice of unsatisfactory performance has been issued, as prescribed in the relevant section of this strategy statement, and reasons for issuing those notices;
- A Scheme employers failure to provide monthly data to the Administering Authority within the prescribed deadlines set out in clauses 4.2.1 (*new scheme members*) and 4.2.2 (*contract variations*) of the pension administration SLA;
- A Scheme employers failure to notify the Administering Authority that a Scheme member has left the Scheme within the prescribed deadline set out in clause 4.2.3 (*Leavers: No entitlement to Immediate Release of Pension Benefits*) of the pension administration SLA;
- A Scheme employers failure to notify the Administering Authority of a Scheme member's retirement within the prescribed deadline set out in clause 4.2.4 (*Retirements (including Normal Age, Redundancy, Efficiency, Ill Health, Flexible and Voluntary Retirements) and Deaths*) of the pension administration SLA;
- A Scheme employer's failure to provide an annual return to the Administering Authority within the prescribed deadline set out in clause 4.2.9 (*Annual Returns*) of the pension administration SLA;
- A Scheme employer's failure to produce statements of policy as required by the Statutory Regulations within the prescribed deadlines set out by those Regulations;
- A Scheme employer's persistent failure to comply with the statutory requirements of the LGPS Regulations and associated legislation.

It is vital that all Scheme employers ensure that appropriate record-keeping is maintained and where they outsource their payroll, HR or pension administration functions to a third party, that the Scheme employer is clear that the legal responsibility for the provision of pension data to the Administering Authority lies with the Scheme employer and not the third party. Scheme employers must therefore ensure, as part of any contract entered into with a third party, that the third party has sufficiently robust processes in place to fulfil the statutory duties of the Scheme and the performance levels set out in the pension administration service level agreement.

PENSION ADMINISTRATION SERVICE LEVEL AGREEMENT

In order to achieve and monitor performance targets, the Administering Authority will consult with its Scheme employers and produce a Pension Administration Service Level Agreement (SLA) between itself and each Scheme employer, setting out the responsibilities of both the Administering Authority and the Scheme employer in administering the Local Government Pension Scheme.

The SLA is a contract or 'promise' made between the Administering Authority and the Scheme employer which sets out a mutually agreed set of performance standards and timescales by which certain duties and responsibilities are expected to be carried out.

Once agreed the SLA will be signed off by the Administering Authority in its capacity as both the Scheme Manager and the Pension Administrator and by an officer of the Scheme employer who is responsible for ensuring that the performance standards set out in the SLA are monitored and maintained and who can take any action felt necessary to resolve any unsatisfactory levels of performance.

Should a Scheme employer not sign off the SLA, having had the opportunity to enter into consultation with the Administering Authority concerning its content, it will be reported to the Berkshire Pension Fund Panel, Pension Fund Advisory Panel and Pension Board. The Scheme employer's performance will continue to be monitored in line with the standards set out in the SLA.

The Administering Authority will keep the SLA under review and consult with its Scheme employers should amendments be required.

SCHEDULE 1 – WRITTEN NOTICES OF UNSATISFACTORY PERFORMANCE

1	In accordance with Regulation 69(1)(d), where, in the opinion of the Administering Authority, it has incurred additional costs in line with Regulation 70 as a result of a Scheme employer's unsatisfactory performance, the Administering Authority will give a written notice to the Scheme employer setting out the reasons for forming its opinion, the amount the Administering Authority has determined the Scheme employer should pay and the basis upon which the amount has been calculated.
2A	Failure to make payment of monthly employee and employer contributions by the 19 th of the month following the period to which the contributions relate will result in the Administering Authority issuing a written notice of unsatisfactory performance. Where a Scheme employer persistently fails to make payments within the statutory deadline and the Administering Authority considers that this is of a material significance, the Scheme employer will be reported to the Pensions Regulator.
2B	Where a Scheme employer persistently fails to provide the necessary documentation in support of the contribution payment the Administering Authority will issued a written notice of unsatisfactory performance.
3	Failure to make payment of a capital cost owing to the pension fund within 21 calendar days from the date of issue of an invoice will result in the Administering Authority issuing a written notice of unsatisfactory performance. This will be reported as part of a Stewardship report presented at meetings of the Berkshire Pension Fund Panel, Pension Fund Advisory Panel and Pension Board and steps may be taken to recover the amount of interest lost by the Pension Fund calculated in accordance with Regulation 71 of the Local Government Pension Scheme Regulations 2013.
4	Where as a result of the Scheme employer's failure to notify the administering authority of a scheme member's retirement, interest becomes payable on any retirement lump sum paid, the Administering Authority will issue a written notice of unsatisfactory performance. This will be reported as part of a Stewardship report presented at meetings of the Berkshire Pension Fund Panel, Pension Fund Advisory Panel and Pension Board and steps may be taken to recover the amount of interest lost by the Pension Fund calculated in accordance with Regulation 71 of the Local Government Pension Scheme Regulations 2013.

NOTES

1. The Administering Authority has the power to charge a Scheme employer additional costs arising from the Scheme employer's level of performance in accordance with Regulation 70 of the Local Government Pension Scheme Regulations 2013 which will be referred to in all cases.
2. Payment of contributions is set out in clause 4.2.5 of the SLA.
3. Payment of capital costs is set out in clause 6.12 of the SLA.
4. Notifications of retirements is set out in clause 4.2.4 of the SLA. Regulation 71 of the Local Government Pension Scheme Regulations 2013 states that interest must be calculated at one per cent above base rate on a day to day basis from the due date to the date of payment and compounded with three-monthly rests. If late payment of a lump sum occurs as a result of a failure by the scheme member to provide information to the administering authority, the pension fund will be liable for the payment of any interest due.

Compliance and enforcement policy for public service pension schemes

June 2015

The Pensions
Regulator

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1. Introduction

The Pensions Regulator (the regulator) was established under the Pensions Act 2004 (the 2004 Act) as a non-departmental public body, sponsored by the Secretary of State for Work and Pensions, to regulate work-based pensions.

The Public Service Pensions Act 2013, together with the Public Service Pensions Act (Northern Ireland) 2014, introduces an expanded role for the regulator in overseeing the major work-based pension schemes for those working in the public services throughout the UK. Our expanded role includes regulating public service schemes in relation to the new governance and administration requirements introduced by those Acts¹.

This policy sets out our approach to compliance and enforcement in relation to public service pension schemes, which are those principally covering civil servants, the judiciary, local government workers, teachers, health service workers, fire and rescue workers and members of police and armed forces. It describes our expectations for compliance with relevant legal requirements and how we will proceed in cases of non-compliance, including when we may use our enforcement powers.

This document sits under our approach to regulating work-based pensions and our public service regulatory strategy. We refer throughout to provisions of English law. References to provisions of English legislation which do not apply to Northern Ireland or Scotland should be read as references to the provisions of any corresponding Northern Ireland and Scottish legislation.

¹
The Public Service Pensions Act 2013 (in NI, the Public Service Pensions Act (Northern Ireland) 2014) introduces new requirements about the governance and administration of public service pension schemes and extends our regulatory responsibility, including by making amendments to the 2004 Act (in NI, the Pensions (Northern Ireland) Order 2005).

1.1 Approach to regulation of public service schemes

Our public service regulatory strategy sets out how we approach the regulation of public service schemes in light of our statutory objectives. We aim to ensure that all schemes meet the new governance and administration requirements as soon as possible.

Our primary focus will be on educating and enabling schemes to improve standards of governance and administration and comply with legal requirements. We will also be developing our own systems and processes to enable us to better monitor standards, assess where schemes are falling short and best direct our resources to enable them to improve standards and become compliant. We will share this information with the public service schemes to enable them to understand how they are performing alongside their peers.

Public service pension schemes have a total membership of around 13 million and there are approximately 25,000 participating employers spanning the public, private and third sectors. These reforms are significant and those involved with public service schemes face complex and challenging conditions. There are new governance and administration requirements and therefore there may be some scheme managers and pension board members who will fail to comply with the duties because they have not fully understood them. In these cases, we will focus on working with schemes in the early stages of the new regulatory regime to help them become compliant.

We expect those involved in the governance and administration of public service schemes to comply with the law and strive to deliver good outcomes for members, recognising that governance and administration standards and practices impact upon the overall service provided to members and other beneficiaries throughout their membership, including the payment of the correct benefits to the right people at the right time.

However, we are aware that there may be situations where some schemes do not fulfil their responsibilities. We regard failures to address poor standards and non-compliance with the law as unacceptable. Should a scheme manager or pension board member (or other person responsible for complying with legal requirements) fail to comply with their legal requirements under pensions legislation, we may select from one or more of our enforcement options. These range from statutory compliance notices and monetary penalties, to criminal prosecution.

continued over...

1.1 Approach to regulation of public service schemes continued...

We expect scheme managers, assisted by pension boards as appropriate, to:

- ▶ identify and understand the root causes of an issue which is resulting in poor standards of governance and administration and non-compliance with legal requirements
- ▶ develop an improvement plan which will address the root causes of that issue within a reasonable time period, and
- ▶ demonstrate implementation of their plan.

Most of our activities will be focused on educating and enabling schemes to improve standards of governance and administration – particularly in the early stages of the new regulatory regime as schemes reform and adapt to meet the new legal requirements. We will focus on:

- ▶ promoting the public service code of practice and educational tools for public service schemes
- ▶ surveying schemes to understand the extent to which they are meeting the standards and practices we expect
- ▶ engaging with schemes to understand how they are addressing poor standards and non-compliance through the development and implementation of improvement plans, focusing on key risk areas, and
- ▶ undertaking thematic reviews, focusing on key risk areas, to gather information in relation to a particular issue or set of issues and report back to our regulated community about best practice and risks.

Where scheme managers or pension board members fail to address poor standards resulting in non-compliance with the law, we may consider escalating our activities and taking enforcement action.

In considering whether to use our regulatory powers, including any enforcement action, we will take into account all of the circumstances and will act fairly and proportionately.

We will keep this policy under review and update it as required.

1.2 Who does this policy relate to?

This policy relates to public service pension schemes established under the Public Service Pensions Act 2013 and Public Service Pensions Act (Northern Ireland) 2014, new public body pension schemes and other statutory pension schemes which are connected to those schemes. It is not relevant to schemes in the wider public sector which are not public service pension schemes within the meaning of section 318 of the Pensions Act 2004 or Article 2 of the Pensions (Northern Ireland) Order 2005.

This policy is relevant to anyone who has legal requirements or responsibilities relating to the management or administration of a public service pension scheme, or where those responsibilities have been delegated or outsourced – for example scheme managers, pension boards and administrators. It is also relevant to anyone else who could be subject to any of our statutory powers of investigation and enforcement, such as employers and professional advisers.

2. Risk framework

2.1 Our approach to risk in relation to public service pension schemes

In this section, we explain how we will take a risk-based and proportionate approach. A key aspect underpinning our approach is how we will identify and respond to risks and prioritise our activities. In setting our strategic approach to regulating public service schemes, we are primarily guided by two of our five statutory objectives:

- ▶ To protect the benefits of members of occupational pension schemes, and
- ▶ To promote, and to improve understanding of, the good administration of work-based pension schemes.

All public service schemes must be governed and administered in accordance with the requirements of the law. Across all public service schemes, governance and administration standards and practices impact upon the overall service provided to members and other beneficiaries, including the payment of benefits.

Code of practice 14² provides practical guidance for schemes to support them in improving standards of governance and administration and complying with the legal requirements. In considering where to focus our resources on improving standards we will initially concentrate on the risks we have identified as posing the greatest threats to the effective governance and administration of public service schemes and legal requirements not being met, as well as the protection of member benefits where relevant.

We will ensure that any action we take is proportionate and evidence-based. While our key risk areas will be consistent across all public service schemes, what we consider to be tolerable at a particular point in time may vary. We will develop internal risk assessment processes, which will support our operational activity and ensure we are targeted and proportionate. We will ensure our approach to managing risk is proportionate and consistent by obtaining and analysing information from a variety of sources in order to maintain an informed strategic view across public service schemes. This will enable us to:

- ▶ swiftly detect patterns and causes of potential non-compliant behaviour, and
- ▶ establish and maintain effective risk assessment processes to direct and inform our activities.

2
The Pensions Regulator is required to issue a code of practice relating to the following specific matters: i) Knowledge and understanding required by pension board members, ii) Conflicts of interest and representation, iii) Information to be published about schemes, iv) Internal controls, v) Scheme record- keeping, vi) Maintaining contributions, vii) Information to be provided to members, viii) Internal dispute resolution and ix) Reporting breaches of the law (section 90A of the 2004 Act).

2.2 Monitoring and reviewing our compliance activities

Gathering information

In order to maintain an informed strategic view, we will identify, obtain and analyse information from a variety of sources, which may include:

- ▶ scheme returns
- ▶ enquiries and reports we receive
- ▶ media analysis
- ▶ horizon scanning
- ▶ intelligence reports
- ▶ internal and external research, and
- ▶ exchange of information with key parties.

We are required to maintain a register of scheme information which forms the bedrock of information about schemes. We will assist managers for new public service schemes which have arisen out of the new legislation, to meet the legal requirement to register with us and we plan to introduce a bespoke version of the statutory scheme return for all public service schemes. This will request 'registrable information'³ (including information about the scheme, managers of the scheme and employers linked to the scheme) as well as other information which we may reasonably require to exercise our functions.

We plan to engage with schemes in the early stages of the new regulatory regime. While these interactions are primarily intended to enable schemes to raise standards of governance and administration and comply with the legal requirements, we will also gather information. This will be used to inform the risk-based prioritisation of our regulatory activities.

We will conduct an annual governance and administration survey with schemes to understand the extent to which they are meeting the standards and practices we expect. The first survey, which we plan to conduct in 2015, will comprise of a short online questionnaire. This will serve as an enablement tool for schemes and will help inform our risk assessment processes.

continued over...

³ 'Registrable information' is certain information relating to a scheme specified in section 60 of the 2004 Act. Managers must provide this information when registering a scheme and keep it up to date. The regulator must ask for this information in scheme return notices and record it in the register of pension schemes.

2. Risk framework

2.2 Monitoring and reviewing our compliance activities continued...

Generally, we do not expect to specify how schemes should evidence any improvement activities, although we may seek or require information in a certain format on a case-by-case basis. Wherever possible, we will seek to make use of information that has already been gathered or reported by a scheme, to avoid duplication and unnecessary burdens. We will be proportionate in our activities, focusing on key areas that will help managers and others involved with public service schemes to improve governance and administration standards and comply with the law, and we will consistently work to minimise burdens on schemes.

Reporting breaches of the law

People involved in running or advising public service schemes are required by statute to report 'materially significant' breaches of the law to us under section 70 of the Pensions Act 2004. Those people include scheme managers, members of pension boards, anyone else involved in the administration of a scheme, employers, professional advisers and anyone who is otherwise involved in advising the scheme manager in relation to the scheme. Our public service code of practice provides guidance on how to assess 'material significance'.

We expect whistleblowers to follow our guidance on reporting breaches, which requires two key judgements:

1. Does the reporter have reasonable cause to believe there has been a breach of the law?
2. If so, does the reporter believe the breach is likely to be of material significance to The Pensions Regulator?

Receiving a report of a breach will not necessarily result in enforcement action. It may inform our education and enablement activities or the focus of a thematic review. In line with our risk framework, we will initially concentrate on the risks we have identified as posing the greatest threats to the effective governance and administration of public service schemes and legal requirements not being met, as well as the protection of member benefits where relevant. We will assess reports against a range of risk factors to determine the best course of action.

continued over...

2. Risk framework

2.2 Monitoring and reviewing our compliance activities continued...

Whistleblowing is an important component in our public service monitoring activity. We understand that when an individual provides information to us it may have a potential impact on the relationship between them and those to whom they report, particularly in the case of a scheme manager and member of a pension board. Individuals can always opt to report anonymously to us. However, having an individual's contact details is useful in case we need to ask for more information so we can investigate the concerns raised.

The Employment Rights Act 1996 provides certain protection for employees and workers making a whistleblowing disclosure to us. We will seek to protect a reporter's identity (if requested) and will not explicitly disclose the information except where lawfully required to do so. We will take all reasonable steps to maintain confidentiality, but we cannot give any categorical assurances as the circumstances may mean that the identity of a reporter becomes apparent during the course of an investigation, or we may be ordered by a court to disclose it. We will ensure that individuals who provide information have a specific point of contact and any witnesses are supported throughout our process.

2.3 Risk-based prioritisation

When undertaking risk assessment, we will focus on risks in the following critical areas:

- ▶ **Knowledge and understanding⁴**
Members of pension boards must comply with the requirement to have the appropriate knowledge and understanding, to be able to assist their scheme manager effectively. Failure to do so is a breach of law.
- ▶ **Conflicts of interest⁵**
Scheme managers must ensure that pension board members do not have any conflicts of interest. A failure to do so is a breach of the law and could, for example, result in the advice and/or decisions of the pension board being open to challenge and, ultimately, the ineffective governance of the scheme.
- ▶ **Records⁶**
Legislation specifies the records that must be kept and failure to comply is a breach of the law. The completeness and accuracy of these records will be key to the effective and efficient operation of schemes, including ensuring that the right benefits are paid to the right person at the right time. This will be supported by operating appropriate internal controls.
- ▶ **Internal controls⁷**
Scheme managers must establish and operate internal controls. Failure to comply with this requirement is a breach of the law and it may also result in schemes not being run in accordance with the law and/or risks not being identified, mitigated and managed properly.
- ▶ **Member communication⁸**
The quality of the information provided to members in terms of accuracy, timeliness and clarity is an important factor in achieving good member outcomes. Failure to comply with disclosure requirements is a breach of the law and may indicate incomplete or inaccurate record-keeping and/or inadequate internal controls.
- ▶ **Dealing with internal disputes⁹**
Where we become aware of matters that are raised under internal dispute resolution procedures, this can be an indicator of wider systemic issues which may impact the effective governance and administration of schemes.

4
As required under section 248A of the 2004 Act.

5
Scheme regulations must require scheme managers to be satisfied that pension board members do not have a conflict of interest (section 5(4) of the Public Service Pensions Act 2013).

6
Section 16 of the Public Service Pensions Act 2013 and the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014 (in particular).

7
Section 249B of the 2004 Act.

8
Section 14 of the Public Service Pensions Act 2013, section 113 of the Pension Schemes Act 1993 and the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 (in particular).

9
Dispute resolution procedures must be made and implemented in accordance with section 50 of the Pensions Act 1995.

continued over...

2. Risk framework

2.2 Risk-based prioritisation continued..

In prioritising risk-based regulatory activities, we will consider factors such as schemes' ability and willingness to put matters right and the likely impact of the various types of intervention available to us.

We will adopt a 'test and learn' approach to investigations and regulatory action in relation to public service pension schemes. We plan to use a governance and administration survey, conducted in 2015, to baseline standards and monitor improvement in the following years. We will also learn through our early scheme engagements and feed that learning into the development of our risk-based approach.

3. Our activities to support compliance and enforcement

3.1 Education and enablement

In addition to Code of practice 14 providing practical guidance for schemes to support them to improve standards of governance and administration and comply with the legal requirements on how to comply with regulations, we will produce specific guidance for schemes through educational tools.

These will include e-learning modules aligned to the themes covered in code of practice 14, such as conflicts of interest, managing risk, internal controls and maintaining accurate member data.

We expect scheme managers and pension boards to make use of educational tools and products, whether they are products the regulator has provided, or others. This will help schemes address gaps in knowledge and understanding and assist in compliance. We will consider requests for us to attend training sessions for board members, although we will not lead these sessions.

The practical guidance in Code of practice 14 and the educational tools we have developed may also be used by employers and others to understand the legal requirements of the Public Service Pensions Acts and how their role may be relevant in helping scheme managers comply with them.

We will engage with scheme managers and pension boards to understand how they are addressing poor standards and non-compliance through the development and implementation of improvement plans, focusing on key risk areas.

We will encourage and facilitate those involved with different public service schemes to learn from each other via peer support, challenge networks and action learning sets. We will share best practice that we see as part of these engagements, working with scheme advisory boards, as appropriate, where they have a remit to promote best practice.

We plan to annually survey schemes to assess the extent to which they are meeting the standards and practices that we expect. We intend to publish the results of our surveys and encourage schemes to use the findings to review and refresh systems and controls, monitor risks and prioritise actions.

3.2 Thematic reviews

We will undertake thematic reviews, focusing on key risk areas, to gather information in relation to a particular issue or set of issues. The main purpose of these reviews will be to report back to our regulated community about best practice and risks. They will also improve our understanding of public service schemes and key risk areas, which will inform our activities and enable us to provide targeted and proportionate support.

Thematic reviews across all or part of the public service scheme landscape will be a particularly useful way for us to engage and communicate efficiently with the numerous scheme managers and pension boards of the locally administered schemes. Where appropriate, they will also enable us to engage and communicate with those to whom legal requirements or responsibilities relating to the management or administration of a public service pension scheme apply, or have been delegated or outsourced – for example, employers, administrators and professional advisers.

Selecting a theme for review

We will select the theme for each review based on key risk areas and issues that are identified through different channels, including:

- ▶ educating and enabling activities
- ▶ enquiries and reports we receive
- ▶ horizon scanning
- ▶ intelligence reports
- ▶ information from key parties, which may include scheme advisory boards
- ▶ media analysis.

We may select a theme based on a particular risk area such as record-keeping or internal controls, in order to understand practices in a particular area and help us develop our ongoing regulatory work.

Alternatively, we may choose to focus a review on a particular segment of public service schemes – for example, funded or unfunded, locally or centrally administered schemes – or groups involved in the management or administration of schemes such as scheme managers, pension boards, employers or administrators.

Participation in the review

Where we commence a review, we will expect scheme managers, pension boards and any other parties involved in the management or administration of public service schemes to respond to all requests for information or provide an explanation as to why they can't or won't supply the information. We expect to be able to gather the information on a voluntary basis, but if needed, we may also consider using our formal information-gathering powers under section 72 of the 2004 Act.

3.3 Enforcement

We may become aware of breaches of the law, or significant risks of breaches and a failure to address them, by any of the ways in which we gather information, as well as enquiries or reports we receive.

Actual or potential breaches may be identified via engagement with schemes, thematic reviews or reports. Where an actual or potential breach is identified, we will assess the risk and decide how to proceed.

We expect scheme managers, assisted by pension boards as appropriate, to:

- ▶ identify and understand the root causes of an issue which is resulting in poor standards of governance and administration and non-compliance with legal requirements
- ▶ develop an improvement plan which will address the root causes of that issue within a reasonable time period, and
- ▶ demonstrate implementation of their plan.

Generally, we expect to educate and enable scheme managers and pension board members, so they comply with legal requirements. However, where scheme managers or pension boards fail to address poor standards and non-compliance with the law within a reasonable time period, we will consider escalating our activities, undertaking further investigations and taking regulatory action where there has been a breach of pensions legislation. In certain circumstances we may consider it appropriate to go straight to enforcement action. Further information about how we undertake investigations, our powers and our decision-making process can be found in the Appendix on page 16.

A number of our powers extend to third parties such as employers, for example the power to provide information, education and assistance, or to issue third party notices when we believe a breach by a person is, wholly or partly, a result of a failure of another person.

Appendix

Our regulatory powers and decision-making process

Undertaking investigations

Where we investigate, we may need to make some further enquiries to gather evidence, including for those schemes where we have already made information requests as part of a thematic review. This could include assessing the individual circumstances, the context of any breach of the law, any factors which may affect a decision to take enforcement action and the form that enforcement action might take.

We may seek information, documentation or an explanation from scheme managers and/or pension boards or any other relevant person. A reasonable period of time will be allowed for a response to be provided, taking into account the complexity and amount of information requested and the breach to which it relates.

Before making decisions, we may ask scheme managers and/or pension boards to provide us with information or other evidence of compliance with legal requirements. This may include (but is not limited to) copies of:

- ▶ pension board meeting minutes
- ▶ pension board training plans or logs
- ▶ registers of interest
- ▶ risk registers
- ▶ third party contracts and service level agreements
- ▶ scheme-approved policies and procedures
- ▶ stewardship reports
- ▶ statements of assurance
- ▶ audit reports
- ▶ annual reports and accounts.

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Appendix continued...

Undertaking investigations continued...

We may also contact other persons or third parties if we believe they may be in possession of relevant information or documents. These parties may include:

- ▶ third parties giving advice or providing business services to scheme managers and/or pension boards, and
- ▶ participating employers.

We may gather information through written requests, telephone calls or face-to-face meetings.

All information and evidence gathered during an investigation which amounts to personal data will be held securely and disposed of in accordance with the Data Protection Act 1998. We will disclose information only where we can lawfully do so and in line with the 2004 Act¹⁰ and the Data Protection Act 1998, which govern the disclosure of information we receive in the exercise of our statutory functions.

Any investigation activity will only be undertaken when it is proportionate and reasonable to do so. We will record our decision-making and the justification for our actions and we will assess the risk of each case to ensure the appropriate course of action is taken. Investigations will be conducted in line with our legal obligations including compliance with the Human Rights Act 1998 and the Equality Act 2010.

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10
Sections 82 to 87
of the 2004 Act.

Statutory information-gathering powers

While we expect to be able to gather information on a voluntary basis, where a person fails to respond to information requests without explanation, or we otherwise consider it necessary, we may consider using our formal information-gathering powers.

Under section 72 of the 2004 Act, we can require any person to provide information, or produce any documents in the manner, place and period as specified in the notice.

If we consider it necessary and to be a reasonable and proportionate way of obtaining the relevant information we need during an investigation, we can enter premises at any reasonable time (potentially including those of an employer or other third party) and conduct an inspection for the purpose of investigating whether scheme managers and pension boards have not complied, or are not complying, with certain legislative provisions, as set out under section 73(2) of the 2004 Act.

We may conduct an inspection where we have reason to believe the information could not be obtained under a section 72 request as the information or documents may be destroyed or altered. In these circumstances, we may decide to inspect premises without prior notice and arrive at premises unannounced.

Where a person does not have access to the documents or the information requested in the section 72 notices or they require a longer period in which to locate or gather together the requested information, they should tell us, otherwise sanctions may be imposed for non-compliance with the notice¹¹. We will not refuse reasonable requests for an extension of time without good reason.

Where there is a failure to comply with a section 72 notice without reasonable excuse, we may consider criminal prosecution under section 77, or if false or misleading information is provided, under section 80 of the 2004 Act.

We may also consider the use of a 'Skilled Persons' report under section 71 of the 2004 Act. Provided the appropriate conditions are met, we may also use our powers to apply for a warrant under section 78 of the 2004 Act.

11
Section 77 of
the 2004 Act.

Deciding whether to take enforcement action

Once we have completed our investigations, we will determine what, if any, action should be taken in relation to a particular breach of the law, including enforcement action where there has been a breach of pensions legislation. Where enforcement action is undertaken, we will follow our case team and Determinations Panel procedures¹² which describe how determinations on cases are made and how they can be appealed.

In deciding our approach and whether to take enforcement action in relation to a breach of pensions legislation, we will take into account factors such as the immediacy and materiality of the risk or issue, or the reaction of the parties involved. We will focus on the outcome that the action would provide.

The factors we will consider when deciding whether or not to take enforcement action will vary on a case-by-case basis. However, a key factor will be the extent to which scheme managers, assisted by pension boards as appropriate, have taken steps to:

- ▶ identify and understand the root causes of an issue which is resulting in poor standards of governance and administration and non-compliance with legal requirements
- ▶ develop an improvement plan which will address the root causes of that issue within a reasonable time period, and
- ▶ demonstrate implementation of their plan.

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12
Available at: www.tpr.gov.uk/procedures

Deciding whether to take enforcement action continued...

Some general examples of other factors are provided below. These examples are not exhaustive, nor are they prescriptive or weighted in any way:

- ▶ The number of members affected.
- ▶ The extent to which there is a systemic problem.
- ▶ The financial impact on individual and/or groups of members.
- ▶ The severity and duration of the breach.
- ▶ Whether the breach could have easily been prevented.
- ▶ The degree to which practices relating to the breach in question are inconsistent with Code of practice 14.
- ▶ Whether the scheme manager or pension board has deliberately sought to conceal their non-compliant behaviour by giving false or misleading information to members and/or us.
- ▶ Whether members of pension boards are able to demonstrate that they have adequate knowledge and understanding and have training plans in place.
- ▶ Reaction of the scheme manager and pension board once the non-compliance has been brought to their attention. For example:
 - the speed and co-operation shown to resolve any issues brought to their attention
 - whether they accept responsibility for the non-compliance or demonstrate negative/non-compliant entrenched behaviours, and
 - willingness to engage and co-operate with us.
- ▶ The track record of the scheme manager and/or pension board in complying with their duties and obligations, and
- ▶ Evidence of dishonesty or wilful failures to comply.

Deciding what enforcement action to take

Our enforcement options derive from legislation. We may select from one or more enforcement options, which range from statutory compliance notices and monetary penalties to criminal prosecution.

Our enforcement powers can variously be applied to scheme managers, members of pension boards, employers or third parties such as administrators. We will ensure that we act in accordance with all our legal obligations, including those contained within the Data Protection Act 1998 and Human Rights Act 1998.

Statutory notices

If we believe that a breach of pensions legislation has occurred (as defined in section 13 of the 2004 Act) and that a statutory remedy is needed to secure compliance, we can issue statutory notices to scheme managers, pension board members or third parties, such as participating employers or outsourced payroll providers.

There are specific rules governing the use of different statutory notices. They may be used to direct a person to take, or not to take, specific actions within a specified timeframe. We will consider the circumstances in each case when deciding the most appropriate course to achieving compliance. We may consider the following interventions:

- ▶ Under section 13 of the 2004 Act, we may issue an Improvement Notice requiring specific action to be taken within a certain time, if a person has contravened pensions legislation. An Improvement Notice may direct compliance with a code of practice and will be preceded by a Warning Notice under section 96 of the 2004 Act.
- ▶ Under section 14 of the 2004 Act, we may issue a Third Party Notice requiring specific action to be taken (or to be refrained from being taken) within a certain time. This notice may be issued when we believe a contravention of pensions legislation is, wholly or partly, a result of a failure of another person (as defined in section 13 of the 2004 Act) and will be preceded by a Warning Notice under section 96 of the 2004 Act.

Non-compliance with a statutory notice may result in a penalty.

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Civil penalties

We may impose a penalty under section 10 of the Pensions Act 1995. The maximum amount of a penalty in relation to each breach is £5,000 in the case of an individual and up to £50,000 in any other case.

Other statutory powers and orders

We have a variety of statutory powers, which include the following:

- ▶ **Power to recover unpaid contributions**
If an employer does not make a contribution payment towards an occupational or personal pension scheme on or before the due date, we may, on behalf of the scheme manager, exercise such powers as the scheme managers have to recover that contribution payable under section 17 of the 2004 Act.
- ▶ **Power to appoint a skilled person**
Under section 14A of the 2004 Act, we can assist a pension board in the discharge of its functions where we consider it desirable for the purpose of ensuring compliance with pensions legislation (within the meaning given in section 13 of the 2004 Act). The pension board must have regard to the advice of the skilled person and their costs will be met by the scheme manager.

Publishing the outcome of activity

We may publish reports of our regulatory activities in order to encourage learning and show lessons learned through our work. A decision to publish a report (under section 89 of the 2004 Act) will be taken on a case-by-case basis in line with our publication policy. We will usually engage with those directly involved in advance of publication.

Publishing the outcomes of our regulatory activities is an important way of encouraging improved standards and practices. Publication also raises awareness of the risks to the good governance and administration of schemes and should assist others in avoiding problems.

Publication also enables third parties to understand how their actions may have an impact on schemes. We put great emphasis on preventing problems from occurring, providing guidance to build good practice in collaboration with the regulated community.

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Free online learning for those running public service schemes

Compliance and enforcement policy for public service pension schemes

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