

3. ADMINISTRATION STRATEGY & COMMUNICATIONS POLICY – PART A: BACKGROUND, PURPOSE & REVIEW

3 ADMINISTRATION STRATEGY & COMMUNICATIONS POLICY

Part A: Background, Purpose and Review

1. Background

- a. As stated in the Governance Policy Statement, it is the responsibility of the Cumbria Pensions Committee to exercise the Council's responsibility as 'Administering Authority' for the management of Cumbria Local Government Pension Scheme (Cumbria LGPS).
- b. The Council delegates its functions in respect of the Fund to its Pensions Committee and discharges specific elements of the administration functions of the Fund to:
 - i. The Director of Finance (S151 Officer); and
 - ii. Lancashire County Council (LCC) who provide this service through Local Pensions Partnership Administration (LPPA).
- c. The Administration Strategy (Parts B & C) is set out so as to illustrate the key roles and responsibilities of both the Administering Authority, LPPA, and the scheme employers in the administration of the scheme, highlighting the expected quality and performance standards required of all parties.
- d. The Communication Policy (Part D) is the overarching policy for the Cumbria Pension Fund and sets out the administering authority's policy concerning communications with members, representatives of members, prospective members, and scheme employers.
- e. The Complaints Process for the Cumbria LGPS is set out in part E of this policy.

2. Purpose

- a. **Administration Strategy:** Regulation 59 of the Local Government Pension Scheme Regulations 2013 (the 2013 regulations) allows for the administering authority to prepare and publish, following consultation with Fund Employers, a 'Pension Administration Strategy' to facilitate best practices and efficient customer service in respect of the following:
 - Procedures for liaison and communication with Fund employers;
 - The establishment of performance levels which the administering authority and fund employers are expected to achieve;
 - Procedures to ensure compliance with statutory requirements in connection with the administration of the LGPS;
 - Procedures for improving the methods of passing information between the administering authority and fund employers;

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- The circumstances when the administering authority may consider recovering additional costs that have been incurred due to the unsatisfactory performance of a Fund employer; and
 - Any other matters that the administering authority consider suitable for inclusion in the 'Pension Administration Strategy.'
- b. **Communications Policy:** Regulation 61 of the 2013 regulations states that an administering authority must prepare, maintain and publish a written statement setting out its policy concerning communications with:
- members;
 - representatives of members;
 - prospective members; and
 - Fund employers.

In particular the statement must set out its policy on—

- the provision of information and publicity about the Scheme to members, representatives of members and Fund employers;
- the format, frequency and method of distributing such information or publicity; and
- the promotion of the Scheme to prospective members and their employers.

3. Compliance & review

The undertakings set out within this Pension Administration Strategy and Communications policy will be reviewed and published at least annually to ensure they reflect any changes in scheme regulations and Pension Fund policies and procedures. As required by regulation 59(4) of the 2013 regulations Fund employers will be consulted on any changes to the Administration Strategy.

**3. ADMINISTRATION STRATEGY & COMMUNICATIONS POLICY –
PART B: ADMINISTERING AUTHORITY / LPPA UNDERTAKINGS**

Part B: Administering Authority (and Local Pensions Partnership Administration) Undertakings

1. Liaison and Communication

- 1.1. The Fund has staff dedicated to the provision of Pensions Administration within the core Pensions Team. Additionally, staff at Local Pensions Partnership Administration (LPPA) provide administration services for the Fund. LPPA will act as primary contact for employers in respect of all areas of pension administration. The team are responsible for core aspects of communication and employer liaison.
- 1.2. The Fund aims to use the most appropriate communication medium for the audiences receiving the information. This may involve using more than one method of communication. This table sets out our current methods of communication.

The Administering Authority (either via LPPA or the core team) will:

Activity	Main contact
1.3. Ensure that Employer Forums and Conferences are held on a regular basis and actively seek to promote the LGPS via attendance at the following events, in conjunction with the employer: <ul style="list-style-type: none"> • Pre-retirement courses • New starters induction courses • Annual pension surgeries 	LPPA & core team
1.4. Provide a Helpdesk and online member contact form for enquiries for both members and employers. The Helpdesk contact phone number is 0300 323 0260	LPPA
1.5. Develop and actively promote the use of electronic/online facilities for data sharing and communication purposes between employers, Fund members and the Service.	LPPA
1.6. Develop and actively promote the use of member and employer online self-service systems and provide day to day access and query support.	LPPA
1.7. Provide Scheme information, including: <ul style="list-style-type: none"> • New starter information and documentation; • Scheme guides and fact sheets for both members and employers; • Annual newsletters; and • Employer bulletins (as and when appropriate). 	LPPA

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Activity	Main contact
1.8. Provide employer training (as appropriate), for example: <ul style="list-style-type: none"> • Pension basics and general employer administration functions; • Changes to the regulations; • New technological developments; and • Navigation of systems. 	LPPA & core team
1.9. Carry out annual employer visits for employers with more than 100 members.	LPPA
1.10. At the request of Fund employers provide appropriate attendance at seminars (e.g. pre-retirement or induction courses),	LPPA
1.11. In conjunction with the pensions' team at Cumbria, arrange and facilitate one-off 'Road Shows' where there are material and/or extensive regulatory changes in respect of the Scheme.	LPPA & core team
1.12. Publish, on the Cumbria County Council website, (www.cumbria.gov.uk/Finance): <ul style="list-style-type: none"> ○ the Fund's Annual Report and Accounts; and ○ the Fund's triennial valuation report; and ○ the Fund's Policies, including the Funding Strategy Statement and Investment Strategy Statement. 	Core team
1.13. Undertake appropriate consultation with Fund members and employers as required.	Core team

2. Administration of the LGPS and Compliance

Activity	Main contact
2.1. Maintain and update members' records regarding additional contributions.	LPPA
2.2. Calculate service credits, additional pensions or maximum cash on retirement where appropriate based on fund values received from the Additional Voluntary Contribution (AVC) providers.	LPPA
2.3. Maintain and keep up to date additional contracts for members' contributions and provide information to employers on request on members' contributions regarding breaks in service / maternity/paternity/adoption and leave of absence.	LPPA

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Activity	Main contact
2.4. Ensure that appropriate policies and procedures are in place and all relevant parties aware of their responsibilities in relation to reporting / recording legal breaches.	Core team
2.5. Account to Her Majesty's Revenue and Customs in respect of income tax on pensions, refunds of AVCs and commutation of pensions where appropriate.	LPPA
2.6. Provide information as required to Core team in relation to quarterly and annual HMRC event reporting.	LPPA
2.7. Complete quarterly and annual event reporting and payment of tax in accordance with HMRC requirements.	Core team
2.8. Process pensioner payroll year end routines and comply with HMRC PAYE legislation.	LPPA
2.9. Update systems and member records each year.	LPPA
2.10. At each Actuarial Valuation period, provide the required data in respect of each member and provide statistical information on member movements over the valuation period in order that the Fund Actuaries can determine the assets and liabilities of the Fund.	LPPA & core team
2.11. Reconcile contributions and update fund member personal and financial data received from employers in the LGPS2014 Data Collection File every pay period.	LPPA & core team
2.12. Create member records for all new starters admitted to the LGPS. Send a welcome letter to all members, by email if possible.	LPPA
2.13. Apply any retrospective adjustments to career average pay and accrual rates as informed by employers.	LPPA
2.14. Update and maintain a member's record for any changes received in their circumstances.	LPPA
2.15. Update member records in line with absence notifications, and set up APC arrangements to cover lost benefits as appropriate.	LPPA
2.16. Provide every active, deferred and pension credit member a benefit statement each year.	LPPA
2.17. Provide all members earning £100,000 or more per annum, or on member requests, with annual pension saving statements and information regarding Annual Allowance tax implications.	LPPA

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Activity	Main contact
2.18. Implement Mandatory and Voluntary Scheme Pays at a member's request in accordance with the approved policy.	LPPA
2.19. Process early leavers (deferred benefits / refunds) within 15 working days of the receipt of form LPPA Employer – Leaver form. Pensions Increase Order will be applied to all deferred benefits each year in line with the annual Pensions Increase (Review) Order.	LPPA
2.20. Arrange payment of retirement benefits and create a new record for ongoing pension scheme membership if applicable	LPPA
2.21. Calculate and pay benefits within 5 working days of receipt of notification or date of entitlement, whichever is the latter.	LPPA
2.22. Arrange to make pension payments on the last banking day of each month.	LPPA
2.23. Make payment of compensatory added years pensions as agreed on behalf of the employer in connection with redundancy retirements.	LPPA
2.24. Apply Pensions Increases to pensions on the due date.	LPPA
2.25. Implement changes in pensioner's circumstances within 10 working days of the receipt of the information.	LPPA
2.26. Implement changes in spouse / dependant's circumstances.	LPPA
2.27. Make payments to the member's estate / nominated beneficiary within one month of receipt of the required documentation.	LPPA
2.28. Produce and distribute P60s to pensioners by the 31st May each year.	LPPA
2.29. Produce monthly reports and invoices for Pension strain costs to be recovered from employers.	LPPA & core team
2.30. Raise invoices on at least a quarterly basis to employers to recover payments of compensatory added years pensions arising from redundancy retirements.	Core team
2.31. Comply with the principal regulations (as amended from time to time) relevant to this Pension Administration Strategy Statement.	Core team
2.32. Prepare the Annual Report and Accounts of the Cumbria Pension Fund.	Core team

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Activity	Main contact
2.33. Ensure the appropriate policies, including the Funding Strategy Statement and the Investment Strategy Statement, and Administering Authority discretions are formulated, reviewed and publicised in accordance with the scheme regulations.	Core team

3. Performance

- 3.1. In accordance with good practice and as recommended by the Pensions Regulator¹ the Fund has a suite of performance targets to ensure it is delivering an efficient, effective and customer-focussed service. These targets will be kept under continual review to ensure that they are appropriate and reflect current circumstances and regulatory requirements.
- 3.2. The minimum performance targets set are shown below. Performance against these targets is reported to the Pension Fund Committee. The Annual Administration Report is reported to the Pension Fund Committee in June each year and is available in the Pensions Committee minutes on the Council's website² and key statistics are included in the Cumbria LGPS Annual Report.

3.3. Performance Targets

Performance Standard	Working Days	SLA	LPPA Target
New Starters to be admitted into the Fund	10	90%	95%
Action transfers into the Fund	10*	90%	95%
Action transfers out of the Fund	10*	90%	95%
Provide an estimate of pension benefits to employers or scheme members	10	90%	95%
Process deferred benefits for scheme members	15	90%	95%
Payment of death benefits	5*	90%	95%
Payment of retirement benefits	5*	90%	95%
Pay refunds to scheme members	5*	90%	95%
Respond to general correspondence	10	90%	95%
Aggregation of scheme member records	30	90%	95%

*Revised performance standards from 1 April 2022

¹ Paragraph 42 of Code of Practice no.14: 'Governance and administration of public service pension schemes

² <http://councilportal.cumbria.gov.uk/mgCommitteeDetails.aspx?ID=150>

Part C: Employer Undertakings

1. Liaison and Communication

- 1.1. The employer shall nominate a person / persons who will act as the primary contact(s) for general administration, HR & payroll, financial and regulatory/discretionary issues with Local Pensions Partnership Administration (LPPA) or the core team.
- 1.2. The employer will facilitate an annual visit by LPPA with the appropriate primary contact.
- 1.3. The employer shall nominate an authorised signatory/signatories in respect of all documents and instructions received by LPPA or the core team.
- 1.4. The employer shall endeavour to ensure representation at Employer Forums and Practitioner Conferences as specified in Section 1.1.
- 1.5. The employer shall undertake to ensure that all personnel dealing with the Local Government Pension Scheme as part of their day to day role undergo appropriate training.
- 1.6. Where an employer contracts a third party HR or payroll provider the employer must authorise LPPA or the core team if they wish LPPA or the core team to deal directly with the payroll provider in matters of pensions administration or finance. However, this in no way enables an employer to delegate responsibility for the performance of any required actions (either regulatory responsibilities or requirements set by the Fund administering authority).
- 1.7. The employer shall inform the Fund of any outsourcings of services which involve or may potentially involve TUPE transfers of members of the LGPS as soon as possible to ensure that appropriate pensions information can be included in the tender documentation.

2. Performance Levels

- 2.1. Performance achieved by the Employer in relation to the following will be monitored by LPPA and the core pensions team (as appropriate):
 - Payment of contributions collected, completion and submission of remittance advice to the core team;
 - Submission of annual returns as required to the core team;
 - Submission of LPPA LGPS 2014 Payroll Data Collection File every pay period; and
 - Notification of leavers.
- 2.2. The Fund will regularly report to employers on their individual performance and how this compares to other employers within the Fund. This will identify any

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areas for improvement including outstanding information and / or payments due to the Fund.

- 2.3. Employer performance will be reported to the Pensions Committee on an exception basis.

3. Administration of the LGPS and Compliance

3.1. Contributions

- 3.1.1. The employer will ensure that both employee and employer contributions are deducted at the correct rate (plus any additional contributions as LPPA may request the employer to collect). The employer must record the scheme section (50/50 or Main) in accordance with any election made by the scheme member; and deduct contributions as appropriate. The employer must maintain a policy to review employee tiered contribution rates, and notify LPPA of any changes (see 3.6.3).
 - 3.1.2. All contributions, but not Prudential, Standard Life, Scottish Widows or Utmost Life AVC's, must be paid to the Cumbria Pension Fund on a monthly basis and in any case before the 19th of the month following that in which they were deducted. Non-compliance may result in a financial penalty against the employer and may result in a breach report to the Pensions Regulator.
 - 3.1.3. A remittance advice must be completed and returned to the Core team by 19th of the calendar month following the month in which the contributions were deducted.
 - 3.1.4. The employer will ensure that employee's Utmost Life, Scottish Widows, Standard Live and Prudential AVC's are paid direct to the provider as soon as possible after deduction; but in any event before the 19th of the month following that in which they were deducted as stated above.
- 3.2. Deficit contributions** - Where it has been identified, through the triennial valuation, that an employer has deficit contributions to pay, payment must be made to the fund no later than by the end of the financial year indicated on the employer valuation schedule. Payment can be made as an immediate one off payment or by 12 monthly instalments, with each monthly payment due no later than the last day of the month in which it is scheduled. Any surplus contributions identified in the employer valuation schedule can be offset against employer contributions paid to the Fund in the financial year.
- 3.3. Pension Strain** - Each month LPPA will arrange for the core team to issue an invoice to the employer reflecting the cost of any non-ill health early retirements processed in the previous quarter. The employer must pay the amount within one month of the date of the invoice.

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- 3.4. Rechargeable Pensions** - Where amounts of discretionary pension are paid by LPPA on the employer's behalf, the quarterly amounts will be recharged to the employer and payment must be made within 30 days of invoice date.

This also applies in respect of other rechargeable pension e.g. where the employer has liability to pay for pre 1.4.1974 pensions increase payments and other unfunded pensions.

- 3.5. Year End Information** - The employer will provide information requested by the core team at year end by no later than that set out in the timetable provided by the Administering Authority at year end. The employer will also provide information requested by LPPA at year end no later than that set out in the timetable provided by the Administering Authority at year end.

3.6. Processing

- 3.6.1. Data Collection file** - Employers must submit the LPPA LGPS2014 Payroll Data Collection file promptly at the end of every pay period. Data on this file must reconcile to contributions paid over each month, and must contain accurate figures of pensionable pay, including assumed pensionable pay where appropriate, for LPPA to post to individual member records. Files should be at the latest submitted by 10th of the month following pay period end.

- 3.6.2. New Starters / Disclosure of Information** - At the latest, on the first day of employment, the employer will provide all new starters with LGPS information and request that the employee completes a LPPA Member – Enrolment Form.

The employer will notify the member of their formal admittance to the scheme, and the contribution rate they will pay.

If the employee opts out of the LGPS with less than three months active membership, the employer must refund contributions through payroll. The employer must not encourage employees not to join, or to opt out of the scheme.

The employer must continue to monitor the workforce in line with Automatic enrolment legislation, and re-enrol eligible employees to the LGPS at their re-enrolment date.

Employers must submit the LPPA LGPS2014 Payroll Data Collection file promptly every pay period, from which LPPA will arrange for scheme membership for any new starters.

- 3.6.3. Adjustments of Career average pay** - Employers must submit form LPPA Employer – Pension Pot Adjustments in the following circumstances:
- Where a retrospective change is made to the scheme section and the scheme section was reported incorrectly in a previous pay period;
 - Where a member is brought into the scheme retrospectively and arrears of contributions are recovered;

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- Where a leaver is overpaid, and pensionable pay has been reported incorrectly in a previous pay period.

3.6.4. Changes in circumstance - Employers must submit the LPPA LGPS2014 Payroll Data Collection file promptly every pay period, from which LPPA will arrange for the update of scheme member records in the following circumstances -

- Change of hours / weeks;
- Change of contract;
- Change of tiered contribution rate; and
- Change of address.

3.6.5. Absence - Employers must submit the LPPA LGPS2014 Payroll Data Collection file promptly every pay period, which will provide LPPA with information regarding employees who are absent, including assumed pensionable pay where relevant. On return from the following absences, the member will have suffered a loss of pension benefits, and the employer must write to the member with information on how to buy back these benefits through payment of an Additional Pension Contribution (APC).

- Additional Maternity, Paternity or Adoption Leave on no pay
- Unpaid Leave of absence
- Strike

If the member elects to pay APCs to buy lost pension within 30 days of returning from unpaid leave, the employer must fund 2/3rds of the cost. The exception to this is strike where the employee must pay the full cost.

The employer must submit form LPPA Employer – Return from Absence within 10 days of return from unpaid leave.

3.6.6. Benefit Estimates & Annual Benefit Statements - Employers must submit the LPPA LGPS2014 Payroll Data Collection file promptly every pay period. Where LPPA have queries on the data or status of any member these must be dealt with by the employer within 5 working days, so that LPPA data is always correct and up to date ready for benefit estimate requests.

Where a fund member requests a benefit estimate for voluntary retirement, they should be directed by the employer to My Pension Online in the first instance. Once registered, the member can process their own estimate, or view their most recent benefit statement.

If the member requests a more complex estimate, or is retiring within the next 12 months, then the employer can request the estimate from LPPA by completing the e-form LPPA Employer – Estimate request. Or the member can request this themselves.

Where a fund member or employer requires an early retirement estimate which requires the employer's consent for example for flexible retirement or redundancy retirement, there may be a potential cost to the employer and the employer should ensure they obtain an estimate of this cost from LPPA prior to consenting to the retirement.

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Therefore, the estimate request must be made by the employer, through completion of e-form LPPA Employer – Estimate request.

- 3.6.7. Early Leavers** - The employer will send completed form LPPA Employer – Leaver Form to LPPA when an employee leaves employment (or ‘opts out’ of the scheme) with no entitlement to immediate payment of retirement benefits. The employer will send the form as soon as reasonably practicable and no later than 10 working days after the final payment of salary following termination from the scheme membership.
- 3.6.8. Payment of benefits where employment is continuing** - The employer will send LPPA Employer – Confirmation of Flexible Retirement form to LPPA as soon as the flexible retirement has been approved.

Completed LPPA Employer – Leaver form and LPPA Member – Personal Details form will also be forwarded to Local Pensions Partnership Administration together with all supporting documentation, as soon as reasonably practicable and no more than 5 working days after the final payment of salary following the date of termination.

The employer will set up a new employment record with a new pay reference number to enable separate reporting of pension cumulative and membership from the retired post.

- 3.6.9. Retirements** - Employers must always request an estimate of retirement benefits where they are considering allowing a fund member to retire with early payment of pension (e.g. redundancy and employer consent retirements). There is likely to be a cost to the employer which should be considered before allowing the retirement. With the exception of Cumbria County Council, this does not apply to ill health retirements.

The employer will send a LPPA Employer – Intention to Retire form to Local Pensions Partnership Administration as soon as it is known that an employee is leaving with an entitlement to immediate payment of pension benefits or is aged 60 or over.

Completed LPPA Employer – Leaver forms and LPPA Member – Personal Details forms will also be forwarded to Local Pensions Partnership Administration together with all supporting documentation, as soon as reasonably practicable and no more than 5 working days after the final payment of salary following the date of leaving.

Where an employer determines that preserved pension benefits are to be paid early, notification, including the date that benefits are to be brought into payment, will be provided to LPPA within 5 working days following the date of the decision together with all supporting documentation.

Likewise, the employer should notify the member within 5 working days following the date of the decision, if their application has been refused.

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- 3.6.10. Death-in-service** The employer will send a completed LPPA Employer – Leaver form to Local Pensions Partnership Administration following the death of a member within 5 working days of being informed of the employees' death. The LPPA Employer – Leaver form must provide details of informant and next of kin, if known.
- 3.6.11. Terminal Illness** Where an employee is suffering from terminal illness and limited life expectancy, employers should contact the Fund for guidance at the earliest opportunity.
- 3.7. Reporting legal breaches** – Employers must ensure that appropriate policies and procedures are in place and all relevant parties aware of their responsibilities in relation to reporting / recording legal breaches to the Pensions Regulator.

4. Online Communication and Information Sharing

- 4.1. Data Sharing** - LPPA and the core team undertake to develop alternative methods of data capture to automate processes and ensure that fund member data held is accurate and up to date. The employer will commit to the online/electronic requirements of LPPA and the core team.
- 4.2. Self-service** - LPPA undertakes to develop member and employer self-service system functionality to improve customer service and provide instant access to pension information. The employer will commit to the use of the self-service system and commit to promote member self service to their active members.
- 4.3. e-forms** - LPPA undertakes to develop alternative methods of data capture to automate processes and ensure that fund member data held is accurate and up to date, including the development of e-forms. The employer will commit to the online/electronic requirements of Local Pensions Partnership Administration, including the requirement to use e-forms.
- 4.4. Access** - The Employing Authority can authorise that specified employees are granted access to all active fund member records for that employer using Altair Employer Services. The employer must be satisfied that the individuals that are authorised have received appropriate information security training, and that system access is used for pension administration purposes only. The employer must observe its obligations under the General Data Protection Regulations from May 2018 implemented under the Data Protection Act 2018 arising in connection with use of the account and must not do anything which might imply a breach by Local Pensions Partnership Administration of such Act. The employer shall comply with obligations equivalent to those imposed on a data controller by the seventh principle of the Data Protection Act.

5. Circumstances for recovery of Additional Costs

- 5.1. Underperformance** - Where the Administering Authority considers that the Employer has underperformed against the performance levels set out at part C

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of this statement, the Administering Authority will seek to recover additional costs under regulation 70 of the Local Government Pension Scheme Regulations 2013 if it is economic to do so.

- 5.2. Late Payment** - In addition the Authority will seek to recover interest on late payment of contributions under the terms of regulation 71 of the Local Government Pension Scheme Regulations 2013 calculated at 1% above base rate on a day to day basis from the due date to the date of payment and compounded with 3 monthly rests.
- 5.3. New Employers** – In addition to any actuarial or legal fees payable by new employers and admission bodies the Authority will charge a flat rate administration charge of £250 towards the costs involved. This also includes newly converted academies joining Multi Academy Trusts (MAT) or those leaving MATs and entering into alternative arrangements.

6. Other Matters

- 6.1. Employer Decisions** - Any decision made by the employer under the scheme regulations should be notified to the member within 10 working days of the decision being made and must be accompanied by a statement in respect of their right of appeal.
- 6.2. Policies (Employer Discretions)** - Each employer is required to produce, publish, and maintain a statement of policy regarding the exercise of certain discretionary functions available to them within the LGPS regulations. New employers are required to provide the Fund with a copy of the policy statement within 3 months of their admission date. The policy statement must be kept under review and where revisions are made; the revised policy statement must be sent to the Fund and made readily available to all employees within the employing authority within one month of the effective date.
- 6.3. Employer Terminations from the Fund** - Each employer is required to notify the Fund should they decide to cease the addition of new scheme members or if they are considering terminating membership of the Pension Fund. Notification should be made as soon as the decision has been taken, allowing the Pension Fund to instruct the actuary to carry out calculations if applicable.
- 6.4. Funding Strategy Statement (FSS) and Investment Strategy Statement (ISS)** – the employer will ensure, where appropriate, they respond to formal consultations on the FSS and / or the ISS. Where no response is received from an employer the Fund will view this as acceptance of the proposal(s).

Part D: COMMUNICATION POLICY

1. Cumbria Pension Fund recognises the government's objective to help people save for their retirement and will aim to: -
 - Actively encourage the provision of good pension information in plain English and the promotion of pensions in the workplace.
 - Increase transparency and build trust, confidence and engagement in pension saving as the norm.

2. To achieve its aim the Administering Authority will undertake to: -
 - Provide clear, accurate and timely communication about the Local Government Pension Scheme to all stakeholders.*
 - Actively promote the Scheme to prospective members and their employers.
 - Take a multimedia approach in recognition that different styles and methods of communication suit different stakeholders
 - Use and encourage the use of electronic/online communication and information sharing.
 - Support Fund employers, providing publicity and information toolkits, to enable employers to fulfil their responsibility to communicate and share information with members in relation to the Scheme.
 - Treat information security with the upmost importance.

3. Communication Programme

The Fund will regularly review the format, frequency and method of communication. The following programme is currently in use.

Information	Stakeholder*	Format	Frequency	Communication Channel
Actuarial Valuation	All Stakeholders	Formal Report	Triennial	Website & Forum
Fund Policy & Statements	All Stakeholders	Website	As amended	Website
Annual Benefit Statements	Members	Online ** paper	Annual	Online portal (with email alert)/by post
Customer Satisfaction Survey	All Stakeholders	Website/ email	Ongoing	Click Question
Member Guides	Members	Website	On or before employment On request	Via employer HR/payroll departments Email/internet/mail

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Information	Stakeholder*	Format	Frequency	Communication Channel
Employer Updates	Employer	Website, online	As required	Email/website
Pensioner payslips/P60's	Member	Online self-service, paper	Annually	Online portal/email/mail
Employer Guide	Employer	Website	As amended	Online/email
Employer training	Employer	Presentation /Webcast	In line with agreement/on request	Face to face/website/webinars
Factsheets	All members	Website / paper	As required / on request	Website/email
Individual member information	All Stakeholders	Self- service /paper	As required	Website/email
Employer information pack	Employers	Website/ paper	On admission	Website/email
Newsletters	Members	Website/ email/ paper	Annual	Website/email
Scheme change & legislative change	All Stakeholders	Presentation /webcast/ website	As required / on request	Face to face/website
Fund report & accounts	All Stakeholders	Website**	Annually	Website
Performance standards	All Stakeholders	Website	As amended	Website
Query***	All Stakeholders	Telephone/ email/ online/letter	Mon – Fri	Telephone/email/online contact form /letter

*Stakeholders are defined as members, representatives of members, prospective members and employers (members are defined as active, deferred or pensioner members).

** unless otherwise requested.

*** Investment Decision queries – will be responded to in line with the Fund's stated positions as detailed in the Investment Strategy Statement (ISS) (in particular sections 4.7 Responsible Investing, Stewardship and Corporate Governance and Annex A Investment Beliefs). Such queries will be responded to in accordance with the Administering Authority's Freedom of Information procedures.

Scheme Regulations and Overriding Legislation

Cumbria Pension Fund undertakes to comply with Local Government Pension Scheme Regulations and the relevant Overriding Legislation. In particular, the Fund undertakes to comply with the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 [2013/2734]. A full list of Scheme and related legislation is set out below: -

Local Government Pension Scheme Regulations 2013 [2013/2356]
Local Government Pension Scheme (Transitional Provisions and Savings) Regulations 2014 [2014/525]
Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2000 [2000/1410]
Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 [2013/2734]

And the following including any relevant regulations made under the legislation set out below:

Finance Act 2004 [c.12]
Pension Schemes Act 1993 [c.48]
Pensions Act 1995 [c.26]
Pensions Act 2004 [c.35]
Pensions Act 2008 [c.30]
Public Service Pensions Act 2013 [c.25]
Welfare Reform and Pensions Act 1999 [c.30]
Pensions (Increase) Act 1971 [c.56]
Data Protection Act 2018
General Data Protection Regulations 2018
Income Tax (Earning and Pensions) Act 2003 [c.1]

Part E: Complaints Policy for Cumbria LGPS

1. Definition of a complaint

- 1.1.** Cumbria LGPS puts the satisfaction of its Scheme Members at the heart of its business and we always strive to provide a high quality service. However, we are aware that sometimes things can go wrong, and if you are unhappy with the services provided by the Fund you have the right to make a complaint.
- 1.2.** Cumbria LGPS defines a complaint against the Fund as an expression of dissatisfaction about the standards of service; non-compliance with LGPS Regulations; actions or lack of action by the Fund or LPPA acting on behalf of the Fund.
- 1.3.** Any complaint against an employer of the Fund should be made directly to the respective employer and addressed through their complaints process.

2. Who can make a complaint?

- 2.1.** Any scheme member or individual receiving a service from the Fund may make a complaint against the Fund.
- 2.2.** Third parties acting on behalf of scheme members may make a complaint against the Fund, however checks will be undertaken to ensure the authenticity of the third party and that they have the consent of the scheme member to act on their behalf.
- 2.3.** Where a person who is the subject of the complaint does not have capacity to give consent, as defined by the Mental Capacity Act, then a best interest decision will be made about accepting or rejecting the complaint. Any such decisions will be communicated to the complainant.

3. How to make a complaint?

- 3.1.** All complaints associated with the Fund will initially be considered by LPPA. Complaints should be submitted in writing by:
 - E-mail to LPPA.Complaints@localpensionspartnership.org.uk; or
 - In writing to: LPPA
PO Box 1382
Preston
PR2 0WQ
- 3.2.** When submitting a complaint, please provide sufficient information to enable LPPA to identify:

- Your name;
- Your National Insurance number;
- Your Employer (where relevant); and
- Any other details that will help LPPA identify your pension record.

4. What will happen to my complaint?

4.1. LPPA will acknowledge receipt of your complaint within 5 working days. It will then commence a review of your complaint and will:

- Respond to you fully within 30 working days or update you on progress after 30 working days.
- Keep you informed of progress in resolving your complaint.
- Resolve your complaint within 8 weeks or provide you with a detailed update at that point.
- Provide a clear written outcome to your complaint.

4.2. In dealing with your complaint LPPA will:

- Treat all complaints fairly.
- Be objective.
- Learn from every complaint.
- Put right faults in our processes.
- Address any training requirements with the LPPA team and the Cumbria Fund team.

5. What if I am dissatisfied with your response to my complaint?

5.1. If you remain dissatisfied following a response to your complaint from LPPA then you can raise an internal dispute following the Internal Dispute Resolution Procedure (IDRP).

5.2. The IDRP is a formal complaints procedure. This is a two stage process although many complaints are resolved at the first stage. Any complaint you make will be treated seriously and considered thoroughly and fairly.

5.3. Full details of the IDRP process are available on the LPPA website at: **www.lppapensions.co.uk/customer-care/internal-dispute-resolution-procedure/**

5.4. If you remain dissatisfied with the outcome of your complaint after having been considered through the IDRP process, you can refer your complaint to the Pensions Ombudsman. Details are available on the Pensions Ombudsman's website at: **www.pensions-ombudsman.org.uk/**

6. Other sources of help.

6.1. The Money and Pensions Service (MAPS)

MPAS is a free service and is part of the Money and Pensions Service which is an arm's length body, sponsored by the Department for Work and Pensions. It has replaced The Pensions Advisory Service. Moneyhelper is there to make money and pension choices clearer for people. MAPS provides independent and impartial information about pensions, free of charge, to members of the public. It is available to assist members and beneficiaries of the scheme with any pensions query they may have or any general requests for information or guidance concerning their pension benefits.

www.moneyhelper.org.uk/en/pensions-and-retirement

6.2. The Pensions Regulator

This is the regulator of work-based pension schemes. The Pensions Regulator has powers to protect members of work-based pension schemes and a wide range of powers to help put matters right, where needed. In extreme cases the Regulator is able to fine trustees or employers and remove trustees from a scheme.

www.thepensionsregulator.gov.uk/

6.3. The Pension Tracing Service

Holds details of all pension schemes. If you were in a scheme in the past and have lost touch with them, the tracing service may be able to help you track them down. Details are available at:

www.pension-tracing-service-uk.co.uk/pension-trace/

6.4. The Pensions Ombudsman

The Pensions Ombudsman has a dispute resolution team who will try to resolve complaints where members or beneficiaries cannot resolve the matter with the scheme administrators. If this still does not resolve the complaint an application can be made, within 3 years of the event (or within 3 years of when you first knew about it), to the Pensions Ombudsman's legal team for an adjudication.

The Pensions Ombudsman can investigate and determine any complaint involving maladministration of the scheme or matters of fact or law and his/her decision is final, binding and enforceable in court. Matters where legal proceedings have already started cannot be investigated. More information can be found here

www.pensions-ombudsman.org.uk/