



West Midlands Pension Fund

PENSION ADMINISTRATION STRATEGY 2025

1 October 2025

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1. Introduction

This is the Pension Administration Strategy (PAS) of West Midlands Pension Fund (WMPF) in relation to the Local Government Pension Scheme (LGPS, “the scheme”) which is administered by the City of Wolverhampton Council (the administering authority).

We work in partnership with more than 800 participating employers to support 360,000 members. Our employers and members provide public services supporting communities across the West Midlands. Our vision is to create sustainable futures for all.

1.1 The purpose of the Pension Administration Strategy (PAS)

The PAS is designed to provide a structured framework within which we can deliver high-quality administration. It also serves as a comprehensive guide to the roles, responsibilities, procedures, and performance required to ensure that we achieve our regulatory requirements and drive best practice.

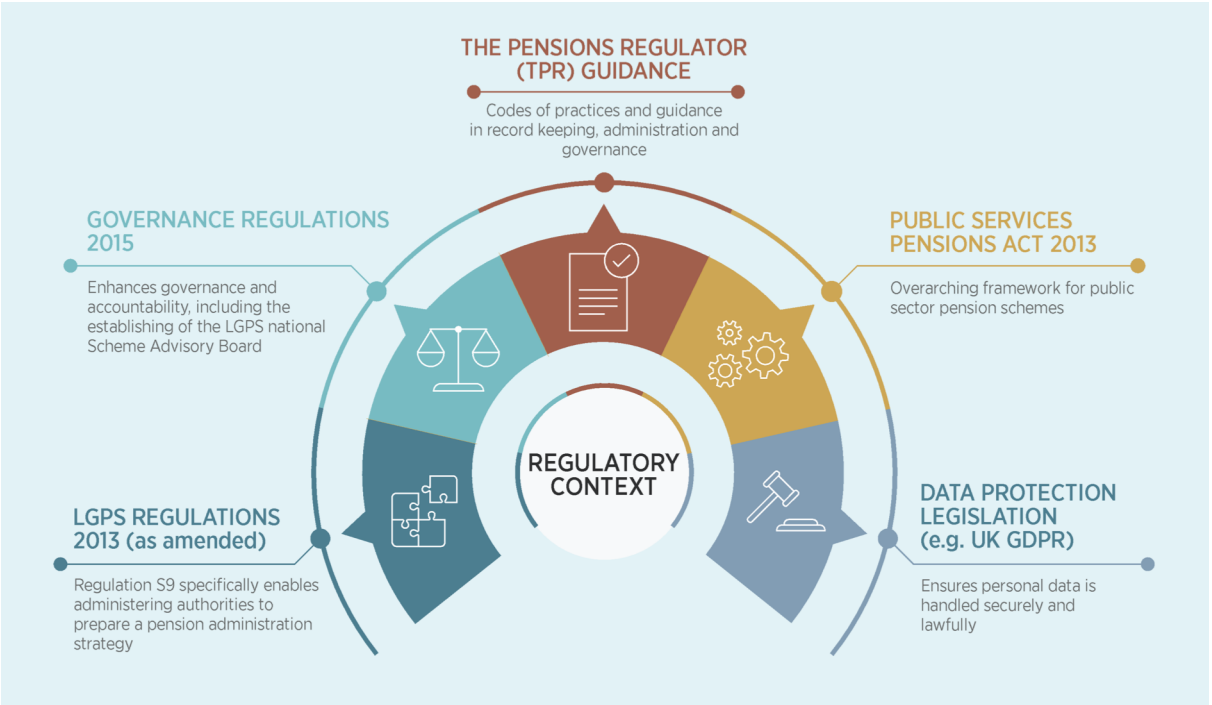
In implementing this strategy, we aim to enhance overall customer experience, improve operational efficiency, and uphold the highest standards of governance and compliance. This document serves as a roadmap for achieving these goals, providing clear guidance and direction for all involved in line with industry best practice.

Our PAS:

- outlines the policies, performance standards, and expectations for us and our scheme employers.
- is developed through a consultative process to ensure the provision of a cost-effective and high-quality pension administration service.
- is regularly reviewed and updated to reflect changes in LGPS regulations, our policies, and operational procedures.

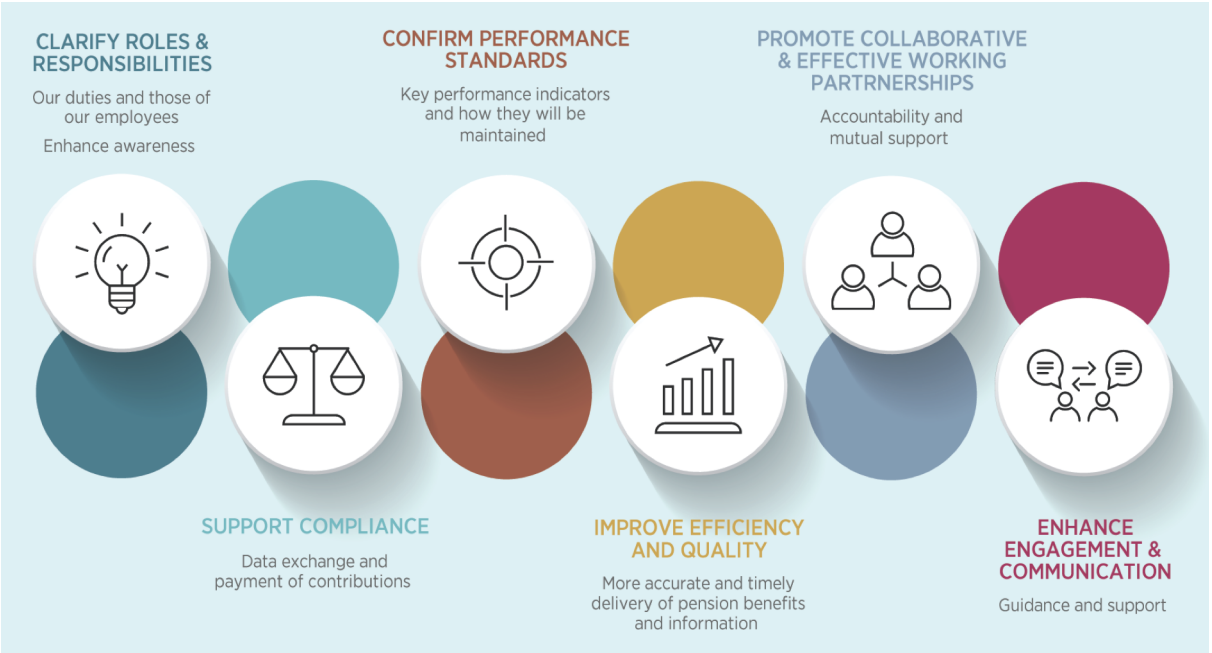
1.2 Regulatory context

Our PAS is grounded in the LGPS Regulations and operates within a robust legal and regulatory framework designed to ensure transparency, accountability, and high standards of service delivery.



2. Aims

Our vision, as outlined in our Corporate Strategy for 2025-2028, is to create sustainable futures for all. To achieve this, our PAS aims to empower our employers to partner with us, ensuring our members receive the right information at the right time.



3. Roles, responsibilities, and performance standards

3.1 Scheme employer roles, responsibilities, and performance standards

3.1.1 Scheme employers who outsource their payroll and/or pension administration to a third-party provider

If you outsource your payroll/pension function you, as a scheme employer, remain responsible for fulfilling the requirements of the PAS and relevant scheme regulations.

As a scheme employer you must:

- actively monitor your payroll provider's work to verify compliance.
- ensure that potential payroll providers are fully aware of LGPS requirements.
- ensure robust processes are in place for the exchange/return of payroll data upon the cessation of a payroll provider's contract.
- maintain records of historical pay and service data.

3.1.2 Acceptable methods of data exchange

You, or your designated third-party payroll provider, must use our secure employer portal Employer Self-Service (ESS) for the submission of interface files (including monthly data, exit interfaces, and standard (member changes) interfaces). Interfaces submitted in any other way will not be accepted unless they are sent with prior approval from a WMPF officer.

Our preferred method for you to communicate with us about member- or employer-related queries is through an Admin Referral case in ESS. This method presents a secure, two-way communication tool that saves a clear audit trail to the relevant member or employer record. Email is an accepted method of communication, but you and your payroll provider must give regard to data security and ensure that you comply with relevant data protection and information management regulations.

3.1.3 Scheme employer duties and timescales

The expectations set out in Table 1 below:

- detail 'what' the expectations on you are, 'how' you can achieve those expectations, and 'when' those expectations should be completed.
- apply to all scheme employers as defined in the LGPS regulations.
- are designed to ensure that we, and our scheme employers, can provide high-quality service to members.
- comprise regulatory, WMPF, and scheme-specific requirements.
- are required to be fulfilled to ensure efficient and timely administration of the scheme.
- assume that where information is required, it will be submitted in full.
- refer to working days/weeks (Monday to Friday, excluding bank holidays) where timescales are given.

Table 1

What	How	When
1.1 Employer administration		
1.1.1 <ul style="list-style-type: none"> • Notify WMPF of employer representatives for the following contact types: <ul style="list-style-type: none"> - day-to-day queries - finance - payroll provider - strategic contact - Internal Dispute Resolution Process (IDRP) adjudicator - MAT head office representative (where applicable). • Notify WMPF of a change in designated contact. 	<ul style="list-style-type: none"> • Following receipt of contact list contained in onboarding confirmation. Complete and return it to WMPFEmployerLiaison2@wolverhampton.gov.uk • Request and contact list from and return it to WMPFEmployerLiaison2@wolverhampton.gov.uk or use the 'Contact us' form. 	<ul style="list-style-type: none"> • Within ten days of entry to the scheme. • No later five days after the change happens.
1.1.2 <ul style="list-style-type: none"> • Notify WMPF of any key changes affecting the scheme employer (notifiable events). Changes may include but are not limited to: <ul style="list-style-type: none"> - contracting out of service - mergers - bulk transfers of staff (including TUPE) - termination of service contracts - policy decisions (for example, restructure or change in employer status/constitution) - material changes in membership profile and/or payroll (for example, a change in active membership or payroll value exceeding 10%, or changes with significant implications for day-to-day operations). <p>Some events may trigger the need for a contribution review between triennial valuations. Early engagement with WMPF is recommended.</p>	<ul style="list-style-type: none"> • Information about, or confirmation of, notifiable events should be sent to WMPFEmployerLiaison2@wolverhampton.gov.uk 	<ul style="list-style-type: none"> • Preferably two months in advance of the event, but as soon as possible once known. • Review legal drafts within three days.
1.1.3 <ul style="list-style-type: none"> • Prepare, publish, and keep under review an employer discretionary policy. • Send a copy of the discretionary policy to WMPF. 	<ul style="list-style-type: none"> • With reference to the scheme regulations and WMPF support on discretionary policies. • Send new or updated discretionary policies to WMPFEmployerLiaison2@wolverhampton.gov.uk 	<ul style="list-style-type: none"> • Within one month of entry to the scheme. • Within one month of a change in the policy.
1.1.4 <ul style="list-style-type: none"> • Engage and comply with current, new and emerging legislative requirements. 	<ul style="list-style-type: none"> • Review and act upon communications sent from WMPF. 	<ul style="list-style-type: none"> • As per communicated requirements.

What	How	When
1.1 Employer administration		
1.1.5 • Respond to requests or queries from WMPF including, but not limited to: - leaver notifications (e.g., pay, service) - contributions/payments - employer onboarding or cessation - interface submission.	• Respond via the method the query was sent.	• Within ten days. - Priority cases marked as 'Timeline' within three days.
1.1.6 • Attend employer training.	• Book onto available training on WMPF's website .	• Upon entry to the scheme. • Upon the recruitment of new staff. • When required as a refresher. • Under direction of WMPF if performance/compliance is judged to be below expectations.
1.1.7 • Complete employer health check.	• Upon receipt of instructions from WMPF, following the guidance provided.	• As per communicated requirements.
1.1.8 • Assess employer data quality and performance.	• Use management of information (MI) dashboards and reporting in ESS.	• At least annually where active member count is less than 1,000. • Quarterly where active member count is greater than 1,000.
1.1.9 • Request the following user account actions: - creation of new users - amendments to existing accounts - revocation of access for users no longer employed at the employer - authorisation of third-party payroll provider access.	• Superusers to request all actions via WMPFEmployerSystemSupport@wolverhampton.gov.uk • ESS acceptable use policy is available on WMPF website .	• As required. • For revocations, immediately upon employee leaving the role or the third-party payroll contract ending.
1.1.10 • Review user access to ESS.	• Use management of information (MI) dashboards and reporting in ESS. • ESS acceptable use policy is available on WMPF website .	• At least annually.

What	How	When
1.2 Contributions and payments		
1.2.1	<ul style="list-style-type: none"> • Apply appropriate contribution rates to, and deduct appropriate employee contributions from, members' pay. • Review members' contribution rates and apply any changes as necessary. 	<ul style="list-style-type: none"> • Use contribution rate tables available on the LGPS website. • Upon members' entry to the scheme. • Upon significant changes to members' pay but at least annually.
1.2.2	<ul style="list-style-type: none"> • Pay employee and employer contributions to WMPF in line with certification from WMPF's actuary. 	<ul style="list-style-type: none"> • Contribution rates applied at the last actuarial valuation can be found here. • Contributions must be paid electronically (e.g. by Bacs/CHAPS) upon submission of a monthly data file and associated web remittance advice (WRA). • Bank details are available upon request from WMPFEmployerLiaison2@wolverhampton.gov.uk • Monthly: no later than 19th of the following month, to reach WMPF's account by 22nd of the month (for example, January's contributions must reach WMPF's account no later than 22nd February).
1.2.3	<ul style="list-style-type: none"> • Deduct additional pension contributions (APCs) from members' pay where appropriate. • Include the deduction in the monthly data file. • Pay the contributions to WMPF. 	<ul style="list-style-type: none"> • Following receipt of instruction from WMPF to deduct APC contributions and based up original member APC contract. • Include APC deduction in column AB (member regular deduction) and AH (employer regular contribution) or AC (lump sum) on monthly data file. • Monthly: no later than 19th of the following month. • Lump sum: no later than 19th month following deduction of the lump sum.
1.2.4	<ul style="list-style-type: none"> • Deduct additional voluntary contributions (AVCs) from members' pay where appropriate. • Include the deduction in the monthly data file for reconciliation. • Pay the contribution to the AVC provider. 	<ul style="list-style-type: none"> • Following receipt of an instruction from the AVC provider to deduct AVC contributions. • Include AVC deduction in column AD (regular deduction) and AJ (employer contribution) on monthly data file. • Monthly: no later than 19th of the following month.
1.2.5	<ul style="list-style-type: none"> • Manage deduction of other, historic, additional contributions (ARCs/Reg 55/part-time buy-back). • Include the deduction in the monthly data file for reconciliation. 	<ul style="list-style-type: none"> • Based upon original member contract. • Include deduction in column AE (ARC), AF (Reg 55) or AK (part-time buy-back) on monthly data file. • Monthly: no later than 19th of the following month.

What	How	When
1.2 Contributions and payments		
1.2.6	<ul style="list-style-type: none"> Refund the contributions of any members that have opted out of the scheme with less than three months' service. Notify WMPF of any members that have opted out of the scheme with less than three months' service. 	<ul style="list-style-type: none"> Refund via employer payroll. Notify WMPF via the monthly submission process on Employer Self-Service (ESS) using WMPF's file layout. In line with employer payroll schedule. Monthly: no later than 19th of the following month (for example, January's monthly data file must be submitted no later than 19th February).
1.2.7	<ul style="list-style-type: none"> Pay costs relating to the early payment of benefits arising from employer discretionary decisions (strain costs). Pay invoices in relation to any standard fees/charges/ other costs. 	<ul style="list-style-type: none"> Send purchase order number (if required) and remittance advice/notice to WMPFAccountsReceivable@wolverhampton.gov.uk Following receipt of invoice from WMPF, make electronic payment (bank details available on invoice). Payment to be made within one month of the receipt of invoice.
1.3 Data submission		
1.3.1	<ul style="list-style-type: none"> Submit a breakdown of employer and employee earnings and contributions (monthly data file) and associated web remittance advice (WRA) using the WMPF file format. 	<ul style="list-style-type: none"> Via the interface submission process on ESS using WMPF's file layout. Monthly: no later than 19th of the following month (for example, January's monthly data file must be submitted no later than 19th February).
1.3.2	<ul style="list-style-type: none"> Notify WMPF of any scheme entrants (new joiners) on the monthly data file. 	<ul style="list-style-type: none"> Via the interface submission process on ESS using WMPF's file layout. Monthly: no later than 19th of the following month (for example, January's monthly data file must be submitted no later than 19th February).
1.3.3	<ul style="list-style-type: none"> Submit changes to member information (e.g., name updates, contribution rate changes, scheme section changes) using the WMPF file format (standard interface). 	<ul style="list-style-type: none"> Via the interface submission process on ESS using WMPF's file layout. As and when required, but no later than one month after the change.
1.3.4	<ul style="list-style-type: none"> Submit a summary of employer and employee earnings and contributions (final statement). 	<ul style="list-style-type: none"> Via admin referral on ESS upon request using WMPF's layout when provided. Annually: usually within two months of year-end.

What	How	When
1.3 Data submission		
1.3.5 <ul style="list-style-type: none">• Notify WMPF when a member is due to leave the scheme through:<ul style="list-style-type: none">- retirement (including ill-health)- leaving employment (deferment/refund)- opting out of the scheme with more than three months service- death of the member.	<ul style="list-style-type: none">• Via the exit interface submission process ESS using WMPF's file layout.	<ul style="list-style-type: none">• Retirements:<ul style="list-style-type: none">- as soon as possible once final pay figures are known but, in general, no sooner than six weeks before or three weeks after the date of retirement¹.• Deferments/refunds:<ul style="list-style-type: none">- no later than one month after the date of leaving/opting out.• Death:<ul style="list-style-type: none">- Within ten days of receipt of notification.
1.4 Member administration		
1.4.1 <ul style="list-style-type: none">• Issue form A1 (declaration of previous pension rights) to members upon their entry to the scheme.• Send member-completed form A1 to WMPF.	<ul style="list-style-type: none">• Issue as part of your employee onboarding process. Form A1 is available here: WMPF Form A1.• Send via DMT@wolverhampton.gov.uk	<ul style="list-style-type: none">• Issue no later than thirty days after the new employee joins your organisation.• Submit within ten days of receipt of completed form.
1.4.2 <ul style="list-style-type: none">• Support the distribution of member-specific communications from WMPF.	<ul style="list-style-type: none">• Distribute materials received from WMPF.	<ul style="list-style-type: none">• As and when required.
1.4.3 <ul style="list-style-type: none">• Determine active and deferred member eligibility for ill health retirement and notify WMPF of the outcome.• Review payment of 'tier 3' ill-health benefits and notify WMPF of outcome.	<ul style="list-style-type: none">• As per WMPF guidelines and in line with internal organisational procedures.	<ul style="list-style-type: none">• In line with internal organisational procedures and WMPF submission requirements (active members).• Review after 'tier 3' benefits have been in payment for eighteen months.

¹ Where notifications fall outside this time-frame or where internal tolerance thresholds are exceeded, we will engage with employers to understand the reasons. If remedial work is required as a result, this may lead to a charge in line with our charging policy.

3.2 West Midlands Pension Fund roles, responsibilities, and performance standards

3.2.1 WMPF duties and timescales

Table 2 outlines our key responsibilities, the actions we will take, and the expected timescales for our performance in delivering services to both you and our members. The table focuses on the main activities that directly involve scheme employers and members but should not be considered a complete list of all our duties.

In all cases where we are responsible for processing member data or benefits, the timescales stated below will apply from the date we receive all necessary information from all relevant parties. Where timescales are given, they refer to working days/weeks (Monday to Friday, excluding bank holidays).

Table 2

What	How	When
2.1 Scheme administration		
2.1.1	<ul style="list-style-type: none"> • Manage the triennial actuarial valuation exercise. • Consult with employers on the provisional outcomes of each triennial valuation. • Confirm final contribution rates following consultation period. 	<ul style="list-style-type: none"> • Liaise with employers and the WMPF actuary to ensure accurate calculation of employer rates for the following three years. • Engage with employers through the following channels: <ul style="list-style-type: none"> - email - website - face-to-face events - webinars. • Final rates to be issued in writing to the designated strategic contact.
		<ul style="list-style-type: none"> • Value the fund every three years, the next cycle commencing April 2025. • Consult three months in advance of the signing of the final rates and adjustment certificate. • Confirm rates no later than 31 March prior to the year the rates come into effect.
2.1.2	<ul style="list-style-type: none"> • Prepare, publish and keep under review relevant policies/ documents. 	<ul style="list-style-type: none"> • With reference to the scheme regulations reflecting best practice, appropriateness, effectiveness and compliance.
		<ul style="list-style-type: none"> • Annually, as required, but at least every three years.

What	How	When
2.1 Scheme administration		
2.1.3 <ul style="list-style-type: none">• Provide an online platform for employers to facilitate:<ul style="list-style-type: none">- data exchange- management of information (MI)- production of estimates to ascertain strain costs.	<ul style="list-style-type: none">• Periods of downtime to be monitored by WMPF systems support and any issues addressed immediately.• Employer Services team to support where the functionality is unavailable.	<ul style="list-style-type: none">• Functionality to be available to enable employer self-service at all times.
2.1.4 <ul style="list-style-type: none">• Publish relevant member or employer scheme forms.• Keep forms under review.	<ul style="list-style-type: none">• Forms to be made available on the WMPF website.	<ul style="list-style-type: none">• Review annually.
2.2 Employer administration		
2.2.1 <ul style="list-style-type: none">• Update scheme employers' designated contacts.	<ul style="list-style-type: none">• Upon instruction from an existing employer contact.	<ul style="list-style-type: none">• Within ten days of receipt of instruction.
2.2.2 <ul style="list-style-type: none">• Manage any key changes affecting the scheme employer (notifiable events). Changes may include but are not limited to:<ul style="list-style-type: none">- mergers- bulk transfers of staff- termination of service contracts- policy decisions- material changes in membership profile.	<ul style="list-style-type: none">• In line with internal and regulatory requirements.	<ul style="list-style-type: none">• As and when required.
2.2.3 <ul style="list-style-type: none">• Respond to queries raised by employers.	<ul style="list-style-type: none">• Respond via the method the query was sent.	<ul style="list-style-type: none">• Within ten days.
2.2.4 <ul style="list-style-type: none">• Engage with employers about current, new and emerging legislative requirements.	<ul style="list-style-type: none">• Through the following channels:<ul style="list-style-type: none">- email- website- face-to-face events- webinars.	<ul style="list-style-type: none">• As required.
2.2.5 <ul style="list-style-type: none">• Create and deliver a comprehensive suite of employer training.	<ul style="list-style-type: none">• Ensure training is available for employers and payroll providers to book through the WMPF website.	<ul style="list-style-type: none">• At least two sessions per month.
2.2.6 <ul style="list-style-type: none">• Issue employer health check.	<ul style="list-style-type: none">• Issue health check requirements and associated guidance to all main employer contacts.	<ul style="list-style-type: none">• Annually

What	How	When
2.2 Employer administration		
2.2.7 • Action the following user account requests: - creation of new users - amendments to existing accounts - revocation of access for users no longer employed at the employer.	• Upon receipt of user declaration/email confirmation from employer.	• Within five days
2.2.8 • Review user access to ESS and disable inactive accounts.	• Accounts that have not been active for twelve months at point of check will be disabled.	• Annually.
2.2.9 • Achieve 85% of employer calls answered.	• Via dedicated employer helpline: 0300 111 6516	• Helpline available: Monday to Thursday: 8:30am to 5:00pm Friday: 8:30am to 4:30pm.
2.3 Contributions and payments		
2.3.1 • Notify new scheme employers of their contribution rate.	• In line with the admitted body and academy factsheets , rates will be communicated to employers by email to the designated contact.	• Within six weeks of receipt of necessary information.
2.3.2 • Allocate employee and employer contributions received.	• Upon receipt of electronic payment (e.g. Bacs/CHAPS) and submission of a monthly data file and associated Web Remittance Advice (WRA).	• Within five days of receipt of necessary information.
2.3.3 • Instruct employer to create and implement payment schedule for additional pension contributions (APCs).	• Following receipt of employer-authorised contract, instructions will be sent to designated employer contact.	• Within fifteen days of the receipt of election from a scheme member.
2.3.4 • Issue invoices for costs relating to the early payment of benefits arising from employer discretionary decisions (strain costs). • Issue invoices in relation to any standard fees/charges/ other costs.	• Send by email to the designated employer finance/ invoice contact.	• Strain cost invoices to be issued within one month of retirement finalisation. • Other cost invoices to be issued within one month of fees/charges being confirmed.

What	How	When
2.4 Data submission		
2.4.1 <ul style="list-style-type: none">Process new entrants and return member reference number to employer.Issue certificate to member.	<ul style="list-style-type: none">New joiner records created upon notification by employer.Using contact details/method supplied on notification from employer.	<ul style="list-style-type: none">Process new entrants no later than twenty days after receipt of file.Issue certificate within forty days.
2.4.2 <ul style="list-style-type: none">Monitor submission of monthly data files.Escalate cases of non-submission.	<ul style="list-style-type: none">Engage with employers whose files are 40 days or more late.Follow agreed escalation procedure.	<ul style="list-style-type: none">Weekly.As required.
2.4.3 <ul style="list-style-type: none">Report issues/errors found after analysis of interface files back to employers.	<ul style="list-style-type: none">On standard feedback template via secure email or employer referral workflow.	<ul style="list-style-type: none">Within one month of submission.
2.4.4 <ul style="list-style-type: none">Issue requirements for final statement completion.Review employer final statements.	<ul style="list-style-type: none">By email to designated employer contacts with guidance accessible on WMPF website.After receipt from employer.	<ul style="list-style-type: none">No later than one month prior to year-end.No later than 30 June.
2.5 Member administration		
2.5.1 <ul style="list-style-type: none">Process member-completed form A1 and trigger transfer-in investigation where required.	<ul style="list-style-type: none">Upon receipt from employer.	<ul style="list-style-type: none">Within one month of submission.
2.5.2 <ul style="list-style-type: none">Produce annual benefits statements for both active (ABS) and deferred (DBS) members.	<ul style="list-style-type: none">Following receipt of member earnings, hours, and service data and upon resolution of outstanding employer queries relating to membership records.Statements will be sent via the members' preferred communication channel.	<ul style="list-style-type: none">Targeting production by 31 August following the previous scheme year end.
2.5.3 <ul style="list-style-type: none">Issue transfer-in/out quotation, forms and regulatory guidance notes/leaflets.Process transfer-out payment.Process transfer-in payment.	<ul style="list-style-type: none">Following transfer investigation request from member.Payments to be made to the relevant third-party provider.Payment received from relevant third-party provider.	<ul style="list-style-type: none">Within ten days of receipt of necessary information.Within fifteen days of receipt of all necessary information, regulatory requirements are being met and internal due diligence procedures completed.Within fifteen days of receipt of receipt of payment and paper work from third party provider.

What	How	When
2.5 Member administration		
2.5.4 • Produce and issue divorce quotation. • Implement pension sharing order.	• Quote issued to member and relevant third-party (if applicable). • Communication issued to member and relevant third-party (if applicable).	• Within forty-five days. • Within eighty days.
2.5.5 • Produce and issue pension savings statements (PSS) where necessary.	• Identify members that have exceeded the annual allowance. • Statements will be issued to members.	• No later than 6 October following the end of the previous scheme year.
2.5.6 • Process the relevant benefits when a member leaves the scheme through: <ul style="list-style-type: none"> - retirement (including ill-health) - leaving employment (deferment/refund) - opting out of the scheme with more than three months service. Determine eligibility for refund where indicated - death of the member. 	• Upon receipt of notification from employer.	• Retirements: <ul style="list-style-type: none"> - quotes issued within fifteen days - lump sum issued within fifteen days. • Deferred into payment: <ul style="list-style-type: none"> - quotes issued within fifteen days - lump sum issued within fifteen days. • Deferment/refund: <ul style="list-style-type: none"> - confirmation of benefits to be issued within thirty days. - refund payment made within ten days. • Death: <ul style="list-style-type: none"> - acknowledgement and relevant forms issued (where appropriate) within five days - notification of benefits payable to dependants within ten days - payment of any pension payable made on the next available payroll - payment of death grant within ten days.

4. Supporting employers

We are committed to providing comprehensive support to you as a scheme employer to ensure the effective administration of the pension scheme. A range of resources and support channels are available to assist you in fulfilling your responsibilities.

You can access assistance through the following channels:

- **Telephone support:** our Employer Services team is available to answer queries and provide guidance during working hours on 0300 111 6516.
- **Email support:** you can submit an enquiry by email to the following addresses:
 - For general queries: WMPFEmployerLiaison2@wolverhampton.gov.uk
 - For queries related to Employer Self-Service (ESS) and data submission: WMPFEmployerSystemSupport@wolverhampton.gov.uk
 - For valuation and accounting queries: WMPFValuation@wolverhampton.gov.uk
- **One-to-one support:** we offer the opportunity for meetings with Employer Services officers. These can be arranged to discuss specific issues, provide tailored guidance, or deliver bespoke training.
- **Resources and guidance**
 - Our website (www.wmpfonline.com) serves as a central hub for employer information and guidance. You can find a wealth of resources, including:
 - Employer guides and manuals
 - Training and events
 - Legislation and regulation updates
 - Forms and templates.

5. Monitoring and measuring performance

Employer engagement is crucial for understanding individual circumstances, challenges, and outcomes.

Our engagement with our employers fosters positive working relationships and ensures efficient processes that benefit both you and our members. By ensuring the consistent application of standards we can deliver a fair and cost-effective service.

We will collaborate with you to address performance that's below the expected standard. Where performance is deemed to be at risk, early intervention through training and development will be provided to support improvement. The initial resolution of performance issues will be informal; however, persistent non-compliance without measurable improvement may lead to further action in accordance with LGPS Regulations 2013.

We will address employer training and development needs through our employer education programme, newsletters, website guidance, and routine email and telephone contact. Meetings with our Employer Services team can be requested to discuss cooperation, expectations, and responsibilities, subject to notice.

Together, we and our scheme employers must ensure that all functions and tasks set out in the PAS are carried out to the agreed standards. We will monitor, measure, and report on both our own and your compliance with the service standards detailed in this document. We encourage you, as employers, to review your own performance using the self-service tools and dashboards available in ESS.

We will undertake an annual review of performance against this PAS and will contact you about any performance concerns. The performance of scheme employers against the standards in this document, including data quality, will be incorporated into reports to the committee as appropriate. We monitor our own performance against key performance indicators monthly, and the outcome is reported quarterly to our Pensions Committee. Persistent non-compliance will be addressed in line with the escalation procedure outlined in Appendix 1.

In all cases we will take mitigating circumstances, such as system failure, business continuity events etc, into consideration and take a pragmatic approach when making decisions. We aim for any areas of concern to be resolved through proactive engagement and early intervention. However, if issues cannot be resolved, the matter will be escalated to our Senior Leadership Team.

5.1 Issue resolution and escalation

The impact of non-compliance is far-reaching and can affect (but is not limited to) the following areas:

Failure to pay and/or submit contributions data	Accounting disclosure production Contribution rate setting Benefit statement production Reports to tPR
Failure to respond to queries	Benefit statement production Contribution rate setting Member benefit processing delays
Failure to submit leaver notifications	Benefit statement production Contribution rate setting Member benefit processing delays
Failure to maintain contact information	Important communications missed
Failure to notify us about significant employer events	Trade union involvement Breach of law Members not covered by death-in-service benefits Increased legal/actuarial costs Contribution rate setting Reports to tPR

5.2 Charges and fees

5.2.1 Charges for non-compliance

The LGPS regulations allow us to recover any extra administration costs we incur as a direct result of an employer's performance. If we need to recover such costs, we will provide written notice stating:

- the reason that the scheme employer's performance led to the additional cost.
- the amount of additional cost that we incurred.
- how the additional cost was calculated.
- the parts of this administration strategy that are relevant to our decision to issue the notice.

Our aim is to ensure fairness among all employers, so that other employers don't have to pay more to cover higher administration costs as a result of performance that doesn't meet the required standard.

If you fail to pay any amount owed to us (other than monthly contributions) within one month of the date of invoice, we will charge interest for late payment. This includes any charges and recharges applied under this policy.

5.2.2. Charges for administration

We reserve the right to charge employers for administrative costs that fall outside of our routine administrative tasks. Charges will be made in line with the current approach for the specific requirement, including, but not limited to:

- time-cost for third-party advice/discussions.
- extraordinary employer events (e.g. mergers).
- interim employer contribution rate reviews.
- accounting disclosures and assistance with employer auditor queries.

Table 3 outlines the charges that will be levied against scheme employers who fail to meet the requirements outlined in the PAS.

Table 3

Item	Charge
Failure to attend pre-booked employer training session without 24 hours warning of a change in circumstances.	£30 per person.
Failure to pay employee and employer contributions or other payments due.	Fixed penalty of £500 per occasion plus interest charged on the amount outstanding at 1% above base rate calculated from the date due.
Failure to submit monthly data file and associated web remittance advice by 19th of the month.	Fixed penalty of £500 when file becomes one month late plus a further £50 for each day that the file remains outstanding.
Any rectification work required as a direct result of employer error or failure to abide by the terms of the PAS. Including, but not limited to: <ul style="list-style-type: none"> • incorrect FTE included in monthly data file. • recalculation of member benefits. • failure to notify us of key changes or events. • errors in relation to a change in payroll provider. 	Fixed penalty of £250 per occasion plus charges to account for the officer resource at a minimum hourly rate of £50.
Failure of WMPF to meet its obligations under relevant legislation.	Any fines levied against WMPF (e.g., tPR, ICO, HMRC) that are a direct result of employer sub-standard performance will be recharged directly to the employer concerned.

6. Supplementary information

The PAS is informed by, and should be read in conjunction with, the following WMPF policies and documents:

- [Corporate Strategy 2025 - 2028](#)
- [Communications Policy Statement](#)
- [Customer Engagement Strategy](#)
- [ESS acceptable use policy](#)
- [Funding Strategy Statement](#)
- [Termination Policy](#)
- [Administering Authority Policy Statement](#)
- [Governance Compliance Statement](#)

7. Appendix

7.1 Escalation procedures

In line with the performance management processes described in section five, the following escalation procedures will apply in cases where the PAS requirements are not met.

If non-compliance persists beyond the outlined escalation procedure, we will issue a formal letter. This letter will detail attempts at engagement, support provided, and issues arising from the employer's poor performance in providing statutory information. It will clearly state the expected employer action, confirm any charges levied according to PAS, and confirm if a tPR report has been issued. A request for a face-to-face meeting will also be included.

7.1.1 Benefit administration (retirement, refund, deferment) queries escalation procedure

This procedure will be monitored as the roll-out of new functionality is completed and usage develops.

Benefit administration timeline (working days)	Action	Responsible team	Employer contact level
Day 0	Query to be raised	Operations	Employer payroll contact
Day 10	Follow-up contact with employer	Operations	Employer main and payroll contacts
Day 20	Operations senior officer to make contact	Operations	Employer main and payroll contacts
Day 30	Formal communication outlining final response date and/or to agree a date for a formal meeting	Employer Services	Employer strategic contact

7.1.2 Contribution payment escalation procedure

Payment of contributions timeline (working days)	Action	Responsible team	Employer contact level
Day 0	Payment query to be raised	Finance	Employer payroll contact
Day 10	Follow-up contact with employer	Finance	Employer main and payroll contacts
Day 20	Finance senior officer to make contact	Finance	Employer strategic contact
Day 40	Formal communication to arrange meeting to discuss implications of non-payment	Employer Services	Employer strategic contact

7.1.3 Data queries escalation procedure (in respect of monthly data collection)

Data queries timeline (working days)	Action	Responsible team	Employer contact level
Day 0	Monthly return feedback issued	Data	Employer payroll contact
Day 20	Follow up contact with employer	Data	Employer main and payroll contacts
Day 40	Data senior officer to make contact	Data	Employer strategic contact
Day 90	Formal communication to arrange meeting to discuss implications of non-response.	Employer Services	Employer strategic contact

7.1.4 Late and non-submission of monthly data escalation procedure

Timeline (working days)	Action	Responsible team	Employer contact level
Day 0	Overdue monthly submission email issued	Employer Services	Employer main and payroll contacts
Day 10	Follow up contact with employer	Employer Services	Employer main and payroll contacts
Day 20	Follow up contact with employer	Employer Services	Employer main and payroll contacts
Day 40	Employer Services senior officer to make contact	Employer Services	Employer strategic contact
Day 90	Formal communication to arrange meeting to discuss implications of non-submission.	Employer Services	Employer strategic contact