


Agenda item:

Pensions Committee

On 22 February 2011

Report Title: Pensions Administration Strategy	
Report of Assistant Chief Executive People and Organisational Development	
Signed : 	Dated: 11/2/11
Stuart Young Assistant Chief Executive People and Organisational Development	
Contact Officer : I M Benson – Human Resources Telephone 020 8489 3824	
Wards(s) affected: All	Report for: Non key decision
1. Purpose of the report 1.1 To approve the implementation of a Pensions Administration Strategy (PAS) .	
2. Introduction by Cabinet Member 2.1 Not applicable.	
3. State link(s) with Council Plan Priorities and actions and /or other Strategies: 3.1 The local government pension scheme regulations provide a discretion to Administering Authorities to publish a PAS. 3.2 The aim of the PAS is to distinguish those administering authority functions from those of the employer and to create a standard set of Service Level Agreements (SLAs) which will improve the flow of data,	

4. Recommendations

- 4.1 That the Council adopt the PAS document attached as Appendix 1 to this report.
- 4.2 That the PAS is reviewed on a triennial basis commencing from 1st April 2014.
- 4.3 That authority is delegated to the Head of Human Resources to develop the PAS within the policy framework approved by this committee, in consultation with the employing bodies and the trade unions.

5. Reason for recommendations

- 5.1. Formal approval by the Committee is required to exercise the discretion of the Administering Authority to publish a PAS under Regulation 65 of the Local Government Pension Scheme (Administration) Regulations 2008 .

6. Other options considered

- 6.1. Not applicable.

7. Summary

- 7.1 The scheme regulations give administering authorities the discretion to prepare a PAS policy statement on such matters as:-
 - procedures for liaison and communication with employing bodies
 - establishment of levels of performance
 - compliance with statutory requirements
 - serving notice of unsatisfactory performance
- 7.2 Although admission agreements set out the compliance obligations on employing bodies, there is no agreement setting out performance standards. The PAS addresses this issue Publishing a PAS will assist in improving efficiency, governance and good working relations. This in turn will both raise the profile of the scheme and reduce unnecessary costs.
- 7.3 The administering authority and its employing bodies must have regard to the PAS when carrying out their scheme functions.

8 Head of Financial Services Comments

- 8.1 There are no costs associated with implementing this strategy. The introduction is a positive step as it provides clarity about respective responsibilities, which should enable the service to improve efficiency. It will also enable the Pension Fund to recover additional costs which arise from employers not meeting their

responsibilities.

9 Head of Legal Services Comments

9.1 The Head of Legal Services has been consulted concerning the content of this report. The Council as administering authority has the power under Regulation 65 of the LGPS (Administration) Regulations 2008 (as amended) to prepare a pensions admission strategy. Once the authority has determined its strategy, the authority must keep it under review. The content of the proposed strategy meets the requirements contained within Regulation 65(1).

10 Equalities & Community Cohesion Comments

10.1 There are no equalities issues arising from this report.

11 Consultation

11.1 The trade unions and employing bodies have been consulted on the draft PAS. The trade unions confirmed they had no comments. There has been no response from the employing bodies.

12 Service Financial Comments

12.1 There are no anticipated costs arising out of the proposals. In fact it is anticipated that over time costs will be managed more effectively through these proposals

13 Use of appendices /Tables and photographs

13.1 Appendix 1 is the draft PAS

14. Local Government (Access to Information) Act 1985

14.1 Local Government Pension Scheme (Administration) Regulations 2011

15. Background

15.1 Regulation 65 of the Local Government Pension Scheme (Administration) Regulations 2008 allows the Council as the Administering Authority to create a PAS which sets out the roles and responsibilities of the administering authority and the employing bodies in administering the LGPS. Regulation 43 allows the administering to recover costs from the employing bodies resulting from their underperformance

15.2 The admission agreement sets out both the obligation on employing bodies to provide relevant information to the administering authority and the general requirement to comply with statutory requirements under the scheme. But there is no agreement setting out the expected performance standards around which the provision of data and notifications should operate. The PAS addresses this issue for the benefit of both the administering authority, the employing bodies and ultimately the scheme membership. It also sets the standard by which underperformance can be measured and costs recovered by the administering authority.

15.3 The implementation of the PAS has regulatory backing as mentioned above and applies to all current employing bodies listed in Appendix 1 of the PAS document. It will also apply to employing bodies which may be admitted in the future.

16. Aims and Objectives

16.1 The aim of the strategy is to define the quality and performance standards expected of all employing bodies participating in the Haringey Council Pension Scheme. The performance standards are set out in Section 3 the PAS document

16.2 The PAS seeks to promote good working relationships and improve efficiency within a framework that is transparent to all and which is reviewed in conjunction with the scheme employers and the trade unions

16.3 As the Council redefines its role as a service provider it is expected that the number of bodies admitted to the fund will increase. At the same time the government's policy of encouraging academy and free schools will also increase the number of admitted bodies. The statutory status of a PAS enhances its status as an important tool in managing the participation of outside bodies in the LGPS.

17. Ensuring compliance and good governance

17.1 Ensuring compliance is the responsibility of both the administering authority and the employing bodies. The PAS formalises procedures that are currently in place to ensure that employers are kept up to date with scheme changes, training opportunities and are provided with templates and documents to assist them in providing data and publishing information for which they have responsibilities.

17.2 The London Borough of Haringey Pension Fund is subject to annual audit of its processes and internal controls. The PAS will be a reference for auditors carrying out this function. Employing bodies are expected to comply with requests for information from both internal and external auditors. Any consequent recommendations made will be considered by the Council and implemented following consultation as necessary.

17.3 Performance will be monitored against specific tasks e.g. timely payment of contributions and provision of data for starters and leavers. There will be close liaison with employing bodies to ensure that agreed performance standards are met. An annual report will be submitted in Q2 of each year for the scheme as a whole including the performance of the administering authority. Concerns regarding an individual employer will be reported as and when required.

18 Levying costs for poor performance

18.1 Regulation 43 of the LGPS (Administration) Regulations 2008 provides that an administering authority may recover any additional costs associated with the poor level of performance by an employing body. Details of the approach to be taken by the Council are set out in Section 5 of the PAS document

18.2 Where persistent under performance is identified, every effort will be made to assist the employing body in addressing the causes of the poor performance. Only when all opportunities to improve performance are exhausted will action be initiated to recover costs.

**LOCAL GOVERNMENT PENSION SCHEME
LONDON BOROUGH OF HARINGEY**

Pension Administration Strategy Statement

DD/MM /2009

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INTRODUCTION

This is the Pension Administration Strategy Statement of the London Borough of Haringey Pension Fund, administered by the London Borough of Haringey Council (the administering authority). It has been developed following consultation with employers who participate in the London Borough of Haringey Pension Fund and schools who employ their own Payroll Providers..

This strategy statement sets out the performance standards expected of the Council in its role of administering authority and scheme employer, as well as all other scheme employers and school payroll providers within the London Borough of Haringey Pension Fund. It seeks to promote good working relationships, improve efficiency and ensure quality amongst the scheme employers and school payroll providers and the administering authority and sets out details on how performance levels will be monitored and the action that might be taken where persistent failure occurs.

The Fund comprises 15 scheme employers and approximately (20,500) scheme members (as at March 2009) The efficient delivery of the benefits of the LGPS is dependent on reliable administrative procedures being in place between the administering authority and scheme employers. The scheme employers who participate in the London Borough of Haringey Pension Fund are included in the appendix to this strategy.

It is effective from dd mm yyyy.

Any enquiries in relation to this pension administration strategy statement should be sent to:

Pensions Administration issues: I M Benson Pensions Manager Haringey Council Alexandra House 10 Station Road London N22 7TR Telephone: 020 8489 3826	Pension Fund Accounts /Investment/Governance Nicola Webb Head of Finance Treasury and Pensions Team Haringey Council Alexandra House 10 Station Road London N22 7TR Telephone 020 8489 3731
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1. REGULATORY FRAMEWORK

Regulation 65(1) of the Local Government Pension Scheme (Administration) Regulations 2008 enables the Council as the Administering Authority to prepare a document (“the pension administration strategy”) which contains such of the matters mentioned below as it considers appropriate:-

- Procedures for liaison and communication with their relevant employing authorities
- The establishment of levels of performance which the administering authority and the relevant employing authorities are expected to achieve in carrying out their functions under the LGPS by-

- (i) the setting of performance targets;
 - (ii) the making of agreements about levels of performance and associated matters; or
 - (iii) such other means as the administering authority consider appropriate;
- Procedures which aim to secure that the administering authority and the relevant employing authorities comply with the statutory requirements in respect of those functions and with any agreement about levels of performance.
 - Procedures for improving the communication by the administering authority and the relevant employing authorities to each other of information relating to those functions.
 - The circumstances in which the administering authority may consider giving written notice to a relevant employing authority on account of that employer's unsatisfactory performance in carrying out its functions under these Regulations when measured against established levels of performance.
 - Such other matters as appear to the administering authority to be suitable for inclusion in that strategy.

In addition, the regulation 65(6) of the Administration Regulations also requires that, where a pension administration strategy is produced, a copy is issued to each of their relevant employing authorities as well as to the Secretary of State. Similarly, when the strategy is revised at any future time the administering authority (after say a material change to any policies contained within the strategy) must notify all of its relevant employing authorities and also the Secretary of State.

It is a requirement that, in preparing or revising any pension administration strategy, that the administering authority must consult its relevant employing authorities and such other persons as it considers appropriate.

Regard must be had by both the administering authority and employing authorities to the current version of any pension administration strategy when carrying out their functions under the LGPS Regulations.

In addition, regulation 43 of the Administration Regulations allows an administering authority to recover additional costs from a scheme employer where, in its opinion, they are directly related to the poor performance of that scheme employer. Where this situation arises the administering authority is required to give written notice to the scheme employer, setting out the reasons for believing that additional costs should be recovered, the amount of the additional costs, together with the basis on which the additional amount has been calculated.

The following strategy statement, therefore, sets out the information required in accordance with regulation 65(1) and forms the basis of the day to day relationship between the London Borough of Haringey as the administering authority and the employing authorities of the London Borough of Haringey Pension Fund. It also sets out the circumstances under regulation 43 where additional costs incurred as a result of the poor performance of a scheme employer might be recovered, together with the steps that would be taken before any such action were taken.

RESPONSIBILITIES AND PROCEDURES

PROCEDURES FOR LIAISON AND COMMUNICATION WITH EMPLOYERS

The Council has published a number of documents covering procedures and policy statement. . These include the following:

- Administering Authority discretions
- Guide for employers and Payroll Providers.
- Communication Policy Statement
- Governance Compliance Statement
- Responsible Investment Policy
- Statement of Investment Principles
- Funding Strategy Statement
- Annual Report

These policy statements can be viewed on the Pensions Web Page (www.haringey.gov.uk/pensionfund)

The Council is concerned to ensure the full participation of the employing bodies in the efficient management of the Fund. Both the Council and the Employing Bodies have a joint role and responsibility to ensure that a high quality cost effective service is provided to scheme members and other stakeholders in the Local Government Pension Scheme. The Administration Strategy Statement sets out a framework which will assist all involved in achieving this objective.

Employing Bodies also have a responsibility to formulate and publish a policy statement on the use of employer discretions e.g early and flexible retirements. These policy statements must be kept under review.

This strategy statement has been developed following consultation with scheme employers and other interested parties. It takes account of scheme employers' current pension knowledge, perception of current administration standards and specific training needs to ensure the level of service can be delivered to the standard required by the London Borough of Haringey Pension fund and set out in this statement.

ESTABLISHING LEVELS OF PERFORMANCE

Performance standards

The LGPS regulations require that certain decisions be taken by either the administering authority or the scheme employer, in relation to the rights and entitlements of individual scheme members. In order to meet these obligations in a timely and accurate manner, and also to comply with overriding disclosure requirements, the London Borough of Haringey Fund has agreed levels of performance between itself and scheme employers which are set out below:

Overriding legislation

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

- Pensions Act 1995 and associated disclosure legislation;
- Freedom of Information Act 2000;
- Age Discrimination Act 2006;
- Data Protection Act 1998;
- Disability Discrimination Act 1995;

- Finance Act 2004; and
- Health and Safety legislation
- TUPE Transfers Pensions Act 2004, especially sections 257 and 258
- The Transfer of Employment (Pensions Protection) Regulations 2005 (SI 2005/649).

Where agreed, the administering authority and scheme employers will comply with local standards which go beyond the minimum requirements set out in overriding legislation. Such best practice standards are outlined in the section on timeliness set out below.

Internal standards

The administering authority and scheme employers will ensure that all functions/tasks are carried out to agreed quality standards. In this respect the standards to be met are:

- Compliance with all requirements set out in the employer procedural guide;
- Work to be completed in the required format and/or on the appropriate forms contained within the employer procedural guide;
- Information to be legible and accurate;
- Communications to be in a plain language style;
- Information provided to be checked for accuracy by an appropriately qualified member of staff;
- Information provided to be authorised by an agreed signatory; and
- Actions carried out, or information provided, within the timescales set out in this strategy document.

Timeliness

Overriding legislation dictates minimum standards that pension schemes should meet in providing certain pieces of information to the various parties associated with the scheme. The LGPS itself sets out a number of requirements for the administering authority or scheme employers to provide information to each other, scheme members and prospective scheme members, dependants, other pension arrangements or other regulatory bodies. Local performance standards have been agreed which cover all aspects of the administration of the scheme, where appropriate going beyond the overriding legislative requirements. These locally agreed standards for the London Borough of Haringey Pension Fund are set out below.

Service Provided By London Borough of Haringey As The Administering Authority		
	Function/Task	Performance target
A 1	LIASON AND COMMUNICATION	(Pensions Team)
a)	Publish and keep under review the London Borough of Haringey Pension Fund Administration Strategy Statement.	Within three months of any changes being agreed with scheme employers
b)	Issue and keep up to date scheme guide and all other literature for issue to scheme members	Within 3 months from admission of new employer or date of change/amendment
c)	Issue and keep up to date all forms required for completion by either scheme members, prospective scheme members or scheme employers	Within three months from admission of new employer or date of change/amendment
d)	Formulate and publish policies in relation to all areas where the administering authority may exercise a discretion within the scheme	Within 60 working days of policy being agreed by the Pension Committee

e)	Host employer forum	Annually (at dates to be determined)
f)	Attend meetings with scheme employers	As and when required, following agreement with individual scheme employers
g)	Organise training sessions for scheme employers	Upon request from scheme employers or as required
h)	Publish changes to the scheme rules	Within one month of the change(s) coming into effect
i)	Notify scheme employer (including the London Borough of Haringey in its role as a scheme employer) of issues relating to scheme employer's poor performance (including arranging meeting if required)	Within 5 working days of performance issue becoming apparent and action approved by Head of Human Resources
j)	Notify scheme employer (including the London Borough of Haringey in its role as a scheme employer) of decision to recover additional costs associated with the scheme employer's poor performance (including any interest that may be due)	Within 10 working days of scheme employer's failure to improve performance, as agreed
k)	Issue annual benefit statements to active members as at 31 March each year	By the following end of June
l)	Issue annual benefit statements to deferred benefit members as at 31 March each year	By the following end of June
m)	Issue Pensions Newsletter to pensioner members annually	By April in each year
n)	Issue Pensions Bulletins to active members	As and when required

A2	FUND ADMINISTRATION (Treasury Team)	
a)	Issue formal valuation results (including individual employer details)	10 working days following approval by Pensions Committee / Section 151 Officer (but in any event no later than 31 March following the valuation date)
b)	Publish and keep under review, the fund's Governance Compliance Policy Statement	Within 30 working days of policy being agreed by the Pension Committee
c)	Publish and keep under review the Council' Statement of Investment Principles	Within 30 working days of policy being agreed by the Pension Committee
d)	Publish and keep under review the Council' Responsible Investment Policy Statement	Within 30 working days of policy being agreed by the Pension Committee
e)	Publish and keep under review the Pension Fund's funding strategy statement	To be reviewed at each triennial valuation, following the consultation with scheme employers and the fund's actuary. Revised statement to be issued with the final valuation report
f)	Publish Pension Fund Annual Report	Summary Report in June of each year. Full Report not later than 31 st December in each year.
g)	Arrange Pension Fund Annual General Meeting	To be held by July of each year and no later than December of each year.

A3	SCHEME ADMINISTRATION	
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a)	Maintain member records and issue statutory notices and respond to requests for information or data	10 working days of receipt of all necessary information or enquiry.
b)	Process Transfers in and out of the Fund	30 working days of receipt of transfer value details/transfer payment /all necessary documentation from other scheme and scheme member
c)	Process all applications to pay arrears of pension contributions in relation to leave of absence (inc. maternity/paternity/adoption leave)	20 working days of receipt of all necessary information
d)	Process requests to pay/amend/cease additional regular contributions	20 working days of receipt of required documentation from scheme member
e)	Process all enquiries relating to pension sharing on divorce	20 working days of receipt of all necessary information
f)	Provide requested estimates of benefits to employees/employers	10 working days from date of request
g)	Notify leavers of deferred benefit entitlements	Within 20 working days after leaving or such later date as all necessary documentation is available
h)	Notify retiring employees of benefits. Pay benefits plus interest where required	Within 10 working days after retirement or such later date as all necessary documentation is available
i)	Death notifications	Condolence letter within 5 working days of receipt of notification. Payment / final letter within 20 working days of receipt of required documents
j)	Recovery of arrears of scheme member's contributions	Via issue of invoice to the scheme employer within 10 working days of notification of arrears by the scheme employer
k)	Return of employee contributions plus interest where applicable	20 working days following receipt of all necessary documentation
l)	Appoint stage 2 "appointed person" for the purposes of the pension dispute process and notify all scheme employers of the appointment	Within 30 working days following the resignation of the current "appointed person"
m)	Process all stage 2 pension dispute applications	Within two months of receipt of the application, or such longer time as is required to process the application where further information or clarification is required

Service By The Employing Bodies		
	Function/Task	Performance target
B1	LIAISON AND COMMUNICATION	
a)	Formulate and publish policies in relation to all areas where the employing authority/administering authority may exercise a discretion within the scheme (including providing a copy of the policy decision(s) to the London Borough of Haringey Pension Fund	Formulate or amend policy within 2 months of discretion being introduced or amended. Publish policy within 30 working days of policy being agreed by the appropriate Committee/Board

b)	Remit and provide schedule of employer/employee contributions	By the 19th calendar day of month after deduction
c)	Respond to enquiries from administering authority	5 working days from receipt of enquiry
d)	Provide year-end information required by the London Borough of Haringey Fund, in a format agreed with the London Borough of Haringey Pension Fund	By 30 April following the year end
e)	Make payment of additional costs to the London Borough of Haringey Pension Fund associated with the poor performance of the scheme employer	Within 28 working days of receipt of invoice from the London Borough of Haringey Pension Fund
f)	Distribute any information provided by the London Borough of Haringey Pension Fund to scheme	Within 5 working days of receipt of information from the London Borough of Haringey Pension Fund
g)	Provide new/prospective scheme members with scheme information and new joiner forms	Before joining and not later than two months after joining.
B2	FUND ADMINISTRATION	
a)	All new prospective admitted bodies to undertake, to the satisfaction of the London Borough of Haringey Pension Fund, a risk assessment of the level or bond required in order to protect other scheme employers participating in the pension fund	To be completed before the body can be admitted to the London Borough of Haringey Pension Fund
b)	All admitted bodies to undertake a review of the level of bond or indemnity required to protect the other scheme employers participating in the fund	Annually, or such other period as may be agreed with the administering authority
c)	Payment of additional fund payments in relation to early payment of benefits from, flexible retirement, redundancy or business efficiency retirement	Within 30 working days of receipt of invoice from the London Borough of Haringey Pension Fund
B3	SCHEME ADMINISTRATION	
a)	Make all necessary decisions in relation to new scheme members in the LGPS (whether full or part time, pensionable pay, appropriate pay band, etc)	Before employment / membership starts and not later than 30 working days of employment / membership starting
b)	Provide administering authority with scheme member details in the format required via paper notification/ electronic interface	Before employment starts or within 30 days of commencement
c)	Arrange for the correct deduction of employee contributions from a scheme members pensionable pay on becoming a scheme member	Immediately on joining the scheme, opting-in or change in circumstances
d)	Ensure correct rate of employer contribution is applied	Immediately following notification of employer contribution rate by London Borough of Haringey
e)	Ensure correct deduction of pension contributions during any period of child related leave, trade dispute or other forms of leave of absence from duty	Immediately following receipt of election from scheme member to make the necessary pension contributions
f)	Commence deduction of additional regular contributions or amend such deductions, as appropriate	Month following notification received from the London Borough of Haringey Pension Fund
g)	Cease deduction of additional regular contributions	Immediately following receipt of notification from the London Borough of Haringey Pension Fund
h)	Arrange for the deduction of AVC's and payment over of	Commence deduction of AVCs in

	contributions to AVC provider(s)	month following the month of election/notification from the London Borough of Haringey Pension Fund Pay over contributions to the AVC provider(s) by the 19 th of the month following the month of deduction
i)	Refund any employee contributions deducted in error	Month following month of deduction or month notified of the deduction in error?
j)	Cease deduction of employee contributions where a scheme member opts to leave the scheme	Month following month of receipt of notification from the London Borough of Haringey Pension Fund, or such later date specified by the scheme member
k)	Provide administering authority with details of all contractual changes to a scheme members hours and/or weeks of employment, in a format required by the Administering Authority via paper notification/ electronic interface	Within 30 working days of change event
l)	Notify other material changes in employee's circumstances (e.g. marital or civil partnership status) Via paper notification/ electronic interface	Within 30 working days of change event
m)	Notify unpaid leave of absence and maternity/paternity leave in a format required by the administering authority	Within 30 working days of change event
n)	Determine reason for leaving and provide notification in a format required by the administering authority of scheme leavers via paper notification/via electronic interface	Within 30 working days of change event
o)	Determine reason for retirement and provide notification to administering authority of retiree in a format required by the administering authority via paper notification/ electronic interface	Immediately at point of resignation/notice given by employer
p)	Accurately assess final pay for each scheme member who leaves/retire/dies and forward details in the format required by the administering authority	Unless Payroll Service provided by London Borough of Haringey notify London Borough of Haringey immediately date of leaving is known
q)	Notification to the London Borough of Haringey Pension Fund of death of scheme member via paper notification/via electronic interface	Immediately on being notified of the death
r)	Appoint an independent medical practitioner qualified in occupational health medicine in order to consider all ill health retirement applications and agree appointment with the London Borough of Haringey Pension Fund	Within one month of commencing participation in the scheme or date of resignation of existing medical adviser,
s)	Appoint person for stage 1 of the pension dispute process and provide full details to the administering authority	Within 30 working days following the resignation of the current "appointed person", although employers currently make use of the stage 1 person used by the London Borough of Haringey Pension Fund
t)	Review Third Tier Ill Health Retirement Cases	Notify London Borough of Haringey Pension Fund immediately a member retired with a third tier ill-health benefit

		returns to paid employment or the outcome of the 18 month review whichever is earlier
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External Providers

The administering authority or scheme employers will ensure that any external service providers with responsibility for carrying out any functions relating to the administration of the Local Government Pension Scheme are aware of the standards to be met (such as external pension administration providers, payroll and HR providers). They will also be responsible for ensuring that those standards are met.

PROCEDURES FOR ENSURING COMPLIANCE WITH STATUTORY REQUIREMENTS AND LEVELS OF PERFORMANCE

Ensuring compliance is the responsibility of the administering authority and scheme employers. We will work closely with all scheme employers to ensure compliance with all statutory requirements, whether they are specifically referenced in the LGPS Regulations, in overriding legislation or in this Administration Strategy. We will also work with them to ensure that overall quality and timeliness is improved as part of an agreed service development plan. Various means will be employed, in order to ensure such compliance and service improvement, seeking views from as wide an audience as possible. These include:

Audit

The London Borough of Haringey Pension Fund will be subject to annual audit of its processes and internal controls. The London Borough of Haringey Pension Fund and scheme employers will be expected to fully comply with any requests for information from both internal and approved external auditors. Any subsequent recommendations made will be considered by the London Borough of Haringey Pension Fund and where appropriate duly implemented (following discussions with scheme employers where necessary).

Performance Monitoring

The London Borough of Haringey Pension Fund will monitor performance against specific tasks (set out above) from the event date (e.g. date of leaving/retirement, etc) to date of the completion of the task (notwithstanding that service levels for benchmarking purposes are measured from the date that all necessary data has been received/is available). As part of this monitoring exercise we will include the monitoring of the performance of each scheme employer in the provision of all necessary data required by the administering authority enabling completion of each task. The London Borough of Haringey Pension Fund will also monitor the performance of the administering authority in carrying out its responsibilities in relation to the scheme.

The London Borough of Haringey Pension Fund, as the administering authority, will benchmark our performance against other administering authorities by using benchmarking comparators available.

Employer liaison meetings

Such meetings will take place with representatives of the London Borough of Haringey Pension Fund and the scheme employer as and when required, to monitor and review performance against targets, the quality of information exchange and ensure compliance with statutory obligations.

Employing Body Forums (excluding LEA schools)

Annual meetings will take place to enable an exchange of experience between the London Borough of Haringey Pension Fund and the Fund Employing Bodies to promote statutory compliance.

Communication policy statement

The London Borough of Haringey Pension Fund's communication policy statement currently does not include specific details on monitoring the compliance of the administering authority and scheme employers in communication with various parties associated with the Local Government Pension Scheme. This statement is included as an appendix to this strategy and is subject to regular review to ensure that it remains fit-for-use.

Provision of Information pamphlets

Where necessary the London Borough of Haringey Pension Fund will update the provision of information pamphlets to reflect changes to processes, forms and/or responsibilities highlighted as a result of the monitoring of quality and timeliness.

Technical bulletins

The London Borough of Haringey ensures that all communication received from Communities and Local Government and/or the Employers Organisation is made available to all employers in the London Borough of Haringey Pension Fund. Where necessary, employers will also be notified of any resultant changes to their responsibilities.

Training sessions

The London Borough of Haringey Pension Fund will provide training to scheme employers as and when required in order to rectify significant performance issues where identified, or on request from the scheme employer.

Employing Body forums

Regular meetings (at least annually) will take place with representatives of the London Borough of Haringey Pension Fund and scheme employing bodies to discuss recent developments within the LGPS or pensions generally, as well as to monitor and review communication strategies. Liaison with LEA schools will be conducted through the existing communication channels.e.g The Schools Forum

Employer liaison meetings

Such meetings will take place with representatives of the London Borough of Haringey Pension Fund and the scheme employer as and when required, to discuss any issues relating to the LGPS and/or raise any issues around the performance of the scheme employer or services provided by the administering authority. More frequent meetings will be arranged if necessary (particularly if specific issues around the perceived poor performance of the scheme employer arise).

Continual review

The London Borough of Haringey Pension Fund will continually review the performance of the administering authority and scheme employers against the targets and standards set out in this strategy and address with scheme employers any issues that might be highlighted. The London Borough of Haringey Pension Fund will also monitor success against the targets set out in the three year rolling service improvement plan and take action where necessary.

CIRCUMSTANCES WHERE THE ADMINISTERING AUTHORITY MAY LEVY COSTS ASSOCIATED WITH THE EMPLOYING AUTHORITIES POOR PERFORMANCE

Regulation 43 of the Local Government Pension Scheme (Administration) Regulations 2007 provides that an administering authority may recover from an employing authority any additional costs associated with the administration of the scheme incurred as a result of the poor level of performance of that employing authority. Where an administering authority wishes to recover any such additional costs they must give written notice stating:-

- The reasons in their opinion that the scheme employer's poor performance contributed to the additional cost;
- The amount of the additional cost incurred;
- The basis on how the additional cost was calculated; and
- The provisions of the pension administration strategy relevant to the decision to give notice.

CIRCUMSTANCES WHERE COSTS MIGHT BE RECOVERED

It is the policy of the London Borough of Haringey Pension Fund to recover all additional costs incurred in the administration of the LGPS as a direct result of the poor performance of any scheme employer or third party service provider. The circumstances where such additional costs will be recovered from the employing authority are:

- Persistent failure to provided relevant information to the administering authority, scheme member or other interested party in accordance with specified performance targets (either as a result of timeliness of delivery or quality of information);
- Failure to pass relevant information to the scheme member or potential members, either due to poor quality or not meeting the agreed timescales outlined in the performance targets;
- Failure to deduct and pay over correct employee and employer contributions to the London Borough of Haringey Pension Fund within the stated timescales;
- Instances where the performance of the scheme employer results in fines being levied against the administering authority by the Pension Regulator, Pensions Ombudsman or other regulatory body.

Approach Taken By Administrating Authority

The London Borough of Haringey Pension Fund will seek, at the earliest opportunity, to work closely with employers in identifying any areas of poor performance, provide the necessary training and development and put in place appropriate processes to improve the level of service delivery into the future. Consideration for seeking additional administration costs where persistent failure occurs and no improvement is demonstrated by a scheme employer would be seen as a failure and should only be taken once all opportunities to resolve any issues identified are exhausted. The following sets out the steps we will take in dealing with poor performance by a scheme employer:

- Write to the scheme employer, setting out area(s) of poor performance;
- Meet with the scheme employer, to discuss area(s) of poor performance and how these can be addressed;

- Issue formal written notice, where no improvement is demonstrated by the scheme employer/failure to take agreed action by the scheme employer, setting out the area(s) of poor performance that have been identified, the steps taken to resolve those area(s) and notice that the additional costs will now be reclaimed;
- Clearly set out the calculations of any loss resulting to the London Borough of Haringey Pension Fund or administering authority, or additional cost, taking account of time and resources in resolving the specific area of poor performance; and
- Make claim against the scheme employer, setting out reasons for doing so, in accordance with the Regulations.

REVIEW PROCESS

We will review our administration strategy to ensure it remains up to date and meets the necessary regulatory requirements at least every three years. A current version of the strategy statement will always be available on our website at www.haringey.gov.uk/pensionfund and paper copies will be available on request.

CONSULTATION

In preparing this pension administration strategy we have consulted with the relevant employing authorities and other persons considered appropriate. Where it is necessary to revise the pension administration strategy the relevant employing authorities will again be involved in the consultation process, along with other persons considered appropriate and will be notified in writing of the changes and where a copy of the revised strategy may be obtained.

Scheme Employers

ADMITTED AND SCHEDULED BODIES PARTICIPATING IN THE LONDON BOROUGH OF HARINGEY PENSION FUND		
Employing Body	Status	Open/Closed
Age Concern Haringey	Community Admission Body	C
Haringey C A B	Community Admission Body	C
Alexandra Palace Trading Co	Community Admission Body	C
Urban Futures London Ltd	Transferee Admission Body	C
Enterprise Ltd	Transferee Admission Body	C
Europa Ltd (pending completion)	Transferee Admission Body	C
RM Education Ltd	Transferee Admission Body	C
TLC Group Ltd	Transferee Admission Body	C
Ontime Parking Solutions Ltd	Transferee Admission Body	C
Homes for Haringey	Scheduled Body	O
College of North East London	Scheduled Body	O
Greig City Academy	Scheduled Body	O
Fortismere School	Scheduled Body	O
John Loughborough School	Scheduled Body	O
Updated October 2009		