

Pension Administration Strategy 2025



Introduction

East Sussex County Council is the Administering Authority for the Local Government Pension Scheme (LGPS) on behalf of the Scheme Members and Scheme Employers participating in the LGPS through the East Sussex Pension Fund (the Fund). The LGPS is governed by statutory regulations.

This is the Pension Administration Strategy (the Strategy) of the Fund in relation to the LGPS. The Strategy is kept under review and revised to reflect changes to LGPS regulations and Fund policies. Scheme Employers of the Fund are consulted when any substantial changes are proposed to this Strategy.

The aims of this Strategy are to set out the quality and performance standards expected of the Fund as Administering Authority and Administrator and its Scheme Employers and to further ensure that both the Administering Authority and the Scheme Employers are fully aware of their responsibilities under the LGPS, and to outline the key performance standards they are expected to meet to ensure the delivery of a high-quality, timely and professional administration service.

As at 31 March 2025 the Fund comprised 149 Scheme Employers with 86,784 scheme members in relation to the LGPS; the Fund value was assessed with a value of over £4.9bn.

Setting out the expectations of the Administering Authorities and Scheme Employers will help to ensure that:

- Administration standards improve and are maintained at a high standard;
- Set out the quality and performance standards expected of the Administering Authority and the Scheme Employers in relation to each other; and,
- Promote good working relationships and improve efficiency between the Administering Authority and the Scheme Employers for the benefit of Fund members.

This document therefore sets out a framework by way of outlining the policies and performance standards to be achieved when providing a cost-effective inclusive and high-quality pensions administration.

Delivery of a high standard of administration is not the responsibility of one person or organisation, but rather of a number of different parties, who between them are responsible for meeting the diverse needs of the membership. In recognition of these principles, this Strategy sets out:

- The roles and responsibilities of both the Fund and the Scheme Employers;
- The level of service the Fund and Scheme Employers will provide to each other; and
- The performance measures used to evaluate the level of service.

This Strategy is an agreement between the Fund and its Scheme Employers and is effective from TBC. The Strategy applies to all existing Scheme Employers and all new Scheme Employers joining the Fund after the effective date.

Legislative Framework

The LGPS is a statutory scheme, principally governed by The Local Government Pension Scheme Regulations 2013 (the Regulations). The Strategy has been created pursuant to Regulation 59 of the Regulations and shall be formally reviewed at least every three years.

In carrying out their roles and responsibilities in relation to the administration of the LGPS the Administering Authority and Scheme Employers must have regard to this administration strategy, relevant guidance and overriding legislation. This includes but is not limited to:

- Local Government Pension Scheme Regulations
- The Occupational Pension Schemes (Disclosure of Information) Regulations 2015
- The Pensions Act 1995, 2004 and 2014
- The Pension Schemes Act 2021
- The Public Service Pensions Act 2015
- The Freedom of Information Act 2000
- The Equality Act 2010
- Data Protection Act 2018
- The Finance Act 2004, 2006 and 2014
- All Relevant Health and Safety legislation
- The Pension Regulator's General Code of Practice
- Any other relevant legislation that may apply

The Pensions Regulator has responsibility for oversight of a number of elements of the governance and administration of Public Service pension schemes including the LGPS. The Regulator has the power to issue sanctions and fines in respect of failings of the Administering Authority, and also where employers in the Fund fail to provide correct or timely information to the Administering Authority. Where this occurs as a result of the actions or inactions of Fund employers, the Administering Authority may seek to recharge any costs back to the employer as set out later in this strategy.

Our Aims and Objectives

The purpose of this Strategy is to set out the quality and performance standards expected of East Sussex County Council in its role of Administering Authority and Scheme Employer's within the Fund, and the Pension Administration Team. The Fund has a number of specific administration objectives, these are to:

- provide a high quality, professional, proactive, timely and customer focused administration service to the Fund's stakeholders;
- administer the Fund in a cost effective and efficient manner utilising technology appropriately to obtain value for money;
- ensure the Fund's Scheme Employers are aware of and understand their roles and responsibilities under the LGPS regulations and in the delivery of their administration obligations;
- ensure the correct benefits are paid to, and the correct income collected from, the correct members at the correct time:

- have a culture of risk awareness, governance and compliance and work effectively with partners and stakeholders
- maintain accurate records and ensure data is protected and has authorised use only; and,
- ensure the roles and responsibilities for all stakeholders are clearly set out and understood so that they work seamlessly together in the delivery of the Fund's administration.

Administration of the East Sussex Pension Fund

East Sussex County Council as Administering Authority, has delegated responsibility for the management of the Pension Fund to the East Sussex Pension Committee, taking into consideration advice from the Pensions Board and specialist advisers, and administered and implemented by Officers of the Fund. The Pension Committee and Pension Board monitors the implementation of this Strategy through quarterly service reports and through the Fund's breaches log.

This Strategy will ensure that Scheme Employers have a common understanding of their obligations under the Local Government Pension Scheme and that administrative processes are designed to maximise efficiency and manage risk.

The success of the Fund largely depends on the strength of the relationship between the Administering Authority and the employers that participate in it. Employers have a range of responsibilities within the LGPS and have an obligation to ensure that these duties are effectively delivered. The Fund will provide guidance and support as well as free training where relevant for Scheme Employers to build up and maintain a level of professional expertise which will enable employers to deliver information required by the Fund to efficiently manage the scheme. Guidance for Scheme Employers on a range of topics of responsibility, as well as forms to enact responsibilities are published on the Funds website for ongoing access. This will ensure employers have a sound understanding of:

- Employer discretion policies;
- The role of the appointed person and the Internal dispute resolution procedure;
- Their responsibilities for starters, leavers and changes to membership as set out in the Fund's administration strategy;
- Their responsibilities for collecting and remitting contributions (and, additional contributions);
- The reasons for leaving under the LGPS Regulations;
- Providing information requested by the Fund through monthly data uploads and at year end, or as required for other responsibilities; and,
- Their responsibilities with respect to outsourcing, staff transfers and re-organisations.

The Fund will look for opportunities to work collaboratively with other Administering Authorities to reduce development costs and enhance the quality of information. This might include working with our investment pool colleagues, attending the Southern Area Pension Officer Group, and/or use of the LGPS procurement frameworks.

Communications

The Fund published an updated Communication Strategy Statement in June 2025 which describes the way the Fund communicates with its Scheme Members, Scheme Employers and other stakeholders and interested parties. The latest version of the Communication Strategy Statement can be obtained from the Fund's website:

https://www.eastsussexpensionfund.org/media/lzrj0hat/communication-strategy-2025-eastsussex-pension-fund.pdf

The Fund aims to communicate with Scheme Employers on an ongoing basis in respect of developments relating to the LGPS including training opportunities, as well as ensuring that employers are notified of changes to either professional practice, administration procedures, legislation, notifications from the Pension Regulator, and/or changes to pension scheme regulations as these arise.

The Fund holds an Employer Forum annually in November, to provide opportunities for networking, meet and greet opportunities, as well as to provide information on developments in progress which may affect all Scheme Employers and Scheme Members.

The Fund continues to promote i-Connect as the preferred means for the transfer of employee information from employers to the Fund. I-Connect is a cloud-based platform that allows employers to provide employee details in a secure method and negates the need to provide end of year reporting. Monthly data uploads from employers inform the Fund of any changes to members details, new Joiners and also allows for the upload of leaver forms. The Fund continue to work to onboard all scheme employers, having done so with more than 95% of Fund employers.

Performance Standards

The Administering Authority and Scheme Employers have statutory obligations, functions and tasks in respect of the rights and entitlements of individual Scheme Members. These define a standard of performance and service delivery to individual Scheme Members, which constitute the agreed statutory minimum standards to which Scheme Employers must comply. In instances where Scheme Employers use external service providers for functions relating to the administration of the LGPS, it is incumbent on all employers to ensure that their suppliers and service providers comply with applicable legislation and regulations which apply to the administration of the East Sussex LGPS Fund.

Roles and Responsibilities

Scheme Manager

The East Sussex County Council as Administering Authority, has delegated responsibility for the management of the Pension Fund to the East Sussex Pension Committee, to oversee the management of the Pension Fund. The Pension Board provides assistance to the Administering Authority in ensuring compliance with the regulations. As the Funds Pensions Administration Strategy affects the administration of the Pension Fund, the Pension Board will review the effectiveness of the Fund's Pension Administration Strategy on a regular basis while considering the Funds Administration activity and Performance and activity that could result in Breaches of the law. Details of roles and responsibilities of the Scheme Manager is set out in Appendix A.

Pension Administrator

Pension Administration is delivered as an in-house service and the performance standards that scheme employers and scheme members should expect is outlined in Appendix B for Service Standards. These Service Standards are focused on the key activities which Scheme Employers and Scheme Members are involved in and should not be viewed as a complete list of all activities. It includes key performance indicators that the Administering Authority has agreed for reporting.

Scheme Employer Responsibilities

The roles and responsibilities of Scheme Employers are set out in Appendix C. The appendix defines the main responsibilities of Scheme Employers, to ensure an efficient, accurate and high-quality pension service to Scheme Members when working in partnership with the Pension Administration Team.

Improving Performance

The Fund's Pension Administration Team provide the administrative support to ensure that the administration functions are delivered in compliance with the requirements of the law. If Scheme Employers do not provide the requested data correctly, in the correct format and within the timescales requested by the Administrator, there is a risk the Fund cannot meet its legal obligations and may be liable to penalty fines imposed by The Pension Regulator. This Strategy is therefore focused on good partnership working between Administrator and the Fund's Scheme Employers. The Fund's Employer Engagement team assume the responsibility to help support Scheme Employers directly with training and general support in carrying out their responsibilities while providing a clear route for contact. However, it is recognised there may be circumstances where employers are unable to meet the required standards. The Administering Authority will seek, at the earliest opportunity, to work closely with employers in identifying any areas of poor performance or misunderstanding, provide opportunities for necessary training and development and put in place appropriate processes to improve the level of service delivery in the future. It is expected that it will be extremely rare for there to be ongoing problems but, where persistent and ongoing failure occurs and no improvement is demonstrated by an employer, and/or unwillingness is shown by the employer to resolve the identified issue, we set out below the steps the Fund will take in dealing with the situation in the first instance:

- The Administering Authority will issue a formal written notice to the person nominated by the employer as their key point of contact, setting out the area(s) of poor performance.
- The Administering Authority will record the breach, consistent with the Fund's Breaches Policy. Consideration will given to whether the breach should also be reported to The Pensions Regulator.
- The employer will be requested to create and propose a data improvement plan to the Administering Authority.
- The Administering Authority will request a meeting with the employer to discuss the area(s) of poor performance, how they can be addressed, the timescales in which they will be addressed and how the proposed improvement plan will be implemented and monitored.
- The Administering Authority will issue a formal written notice to the person nominated by the employer, setting out what was agreed at that meeting in relation to how the area(s) of poor performance will be addressed the timescales in which they will be addressed.
- A copy of this communication will be shared with:

- The Head of Pensions at East Sussex County Council
- The Director of Finance or other senior officer at the relevant employer.
- The Pension Board and Pensions Committee of East Sussex County Council
- The Administering Authority will monitor whether the improvement plan is being adhered to and provide written updates at agreed periods to the person nominated by the employer, with copies being provided to the Head of Pensions and the Director of Finance (or alternative senior officer) at that employer.
- Where the improvement plan is not being delivered to the standards and/or timescales agreed, the matter will be escalated the Head of Pensions who will determine the next steps that should be taken. This may include (but is not limited to):
- Meetings with more senior officers at the employer.
- Escalating to the Pension Committee and/or Pension Board, including as part of the Fund's Procedure for Recording and Reporting Breaches of the Law.
- Costs and Charges

The Fund will work closely with all employers to assist them in understanding all requirements, whether they are specifically referenced in the LGPS Regulations, in overriding legislation, or in this Strategy. The Fund will work with each employer to ensure that overall quality and timeliness is continually improved. The 2013 LGPS Regulations provide that an administering authority may recover from an employer, any additional costs including interest associated with the administration of the scheme, incurred as a result of the unsatisfactory level of performance of that employer.

Where an administering authority wishes to recover any such additional costs they must give written notice stating:

- The reasons in their opinion that the employer's level of performance contributed to the additional cost.
- The amount the Administering Authority has determined the employer should pay.
- The basis on which this amount was calculated.
- The provisions of the Strategy relevant to the decision to give notice.

The Administering Authority will recharge to an employer any additional costs incurred by the Fund in the administration of the LGPS as a direct result of such unsatisfactory performance and where it is reasonable to do so. In instances where the performance of the employer results in:

- fines being levied against the Administering Authority by The Pensions Regulator, Pensions Ombudsman or other regulatory body, an amount no greater that the amount of that fine will be recharged to that employer.
- the improvement plan as outlined elsewhere in this strategy is not being adhered to, the Pension Committee may determine that additional costs may be recharged. In these circumstances, the Pension Committee will determine the amount to be recharged and how this is to be calculated. The employer in question will be provided with a copy of that report and will be entitled to attend the Pension Committee when this matter is being considered.

Employers may also be required to pay for additional work that is outside of business as usual, including but not limited to:

- Requesting the Fund undertake non-standard work
- Requesting work to be completed earlier than the normal service standards.
- Requiring the use of external providers (such as the Fund actuary) to complete nonstandard work

Where possible the employer's agreement to the charge will be obtained prior to the work being carried out.

All additional costs relating to this Strategy are met directly by the Fund unless mentioned otherwise.

Charges for additional administration

The table below sets out the fees which the Fund will levy on a Scheme Employer whose performance falls short of the standards set out in this document. Charging is a last resort and the approach outlined in the section above will be followed before a fee is levied.

Charges will be reviewed on an annual basis, and increased in line with the Consumer Price Index (CPI).

| Description | Occurrence in a 12- month period | Administrative charge |
|---|---|---|
| I. Multiple payments/FormsLGPS3 I Multiple payments are made and/or multiple LGPS3 I forms are submitted for a single employer in a single month. | Each instance | £20.00 administration charge per additional payment |
| 2. LGPS31 Forms Failure to provide the LGPS31 Form by the 18 th of the following month contributions are due or failure for the form to be signed and authorized correctly by section 151 or delegated power by the 18 th of the following month its due. | I st instance 2 nd instance | Warning Administrative charge of £150 |
| 3. Employer/ Employee Contributions Failure of Scheme Employers to pay over contributions to the Fund by the 19th of the month following the deduction in line with the legal duty. | I st instance 2 nd instance | Warning Administrative charge of £150 |
| 4. Multiple retirement estimate requests in relation to a single member. Where an employer requests more than one retirement quotation within a 12 month period. This includes all retirement categories, such as ill health, redundancy, efficiency etc. | Ist and second in rolling 12- month period Each additional request | No charge £50.00 administration charge per request |
| 5. Change Notifications Failure to notify the administrators of any change to a member's - working hours - leave of absence with permission (maternity, paternity, career break) or - leave of absence without permission (strike, absent without permission) - within 20 days/the next I-Connect upload of the change in circumstance | I st instance 2 nd instance | Warning Administrative charge of £150 |

| / W = 15 | | |
|---|----------|--|
| 6. Year End Data | | Late receipt - initial fee |
| For employers not using i-Connect. | | of £300 then a fee of |
| | | £150 for every month |
| Failure to provide year end data by 30th April | | the information remains |
| following the year end or the non-provision | | outstanding |
| of year end information or the | | |
| accuracy/quality of the year end data is poor | | Quality/format of data – |
| requiring additional data cleansing. This | | fee of £150 should data |
| applies where Year End Data is required. | | provided not be in the |
| '' | | correct format and/or the |
| | | quality is poor |
| 7. New Starter(s) | | Warning |
| ······································ | lst | * * ai iiiig |
| For employers not using i-Connect - | instance | |
| Failure to notify the administrators of new | | |
| starter(s) and the late or non- provision of | | |
| starter form(s) – within 15 days of | 2nd | CEO foe now member |
| employee joining the scheme/in the next l- | | £50 fee per member |
| Connect upload | instance | |
| 8.Leaver(s)/ retirements | l ot | Warning |
| o.Ecaver (3)/ redirentents | l st | * * a: : : : : : : : : : : : : : : : : : |
| For employers not using i-Connect -Failure | instance | |
| to notify the administrators of any | | |
| leaver(s)/retirements and the late or non- | 2nd | |
| provision of leaver form(s) including an | | |
| accurate assessment of final pay — within | instance | £50 fee per member |
| | | |
| 15 days of employee leaving the scheme or | | |
| employment/in the next I-Connect upload | | |
| 9. Further notification of leaver/ death/ | F 1 | (50 |
| retirement leading to recalculation of | Each | £50 |
| benefit | instance | |
| | | |
| This relates to instances where no | | |
| mitigating factors apply. Such factors | | |
| may include retrospective agreement | | |
| of a pay award. | | |
| 10. I-Connect Data | lst | |
| _ | instance | Warning |
| Failure to provide data through the I-Connect | msance | - |
| system by the required deadline. |)nd | Administrative charge of |
| | 2nd | Administrative charge of £150 |
| III Buda da | instance | 2150 |
| 11. Project data | lst | Marning |
| Failure to provide data requested as part of | instance | Warning |
| projects being run by the Fund to ensure | | |
| changes in legislation are being adhered to, | 2nd | Administrative charge of |
| best practice is being followed or previous errors are rectified. This includes, but is not | instance | £150 |
| errors are rectified. This includes, but is not | | |
| limited to responses to queries relating to data | | |
| received. | | |
| 12 Other non-standard work | | The cost of such work to be |
| Constitution of the state of | | agreed on a case by case |
| A request that work be carried out that would | | basis in advance of action |
| not normally be expected of the | | being taken be the |
| administrators | | administrator. |
| | | |
| | | |

Warnings for non-compliance will operate on a rolling 12-month basis, for example, should a warning have been issued and 10 months later there is a 2nd instance, a fee/administrative charge will apply. However, if it is 13 months later, another warning will be issued.

If an issue has not been resolved within 10 working days of a warning being issued, a fee will apply and the Fund may take further action as appropriate regarding the failure to comply with the statutory requirements.

In addition to the above and consistent with regulation 71 of The Local Government Pension Scheme Regulations 2013, interest may be charged at 1% above base rate on any sum remaining unpaid for more than one month beyond the date on which it became due.

Where delays in providing information result in the Fund being liable to pay interest in accordance with Reg 81 LGPS Regulations 2013, or any superseding legislation, this will be recharged to the Employer.

The Administering Authority does also apply charges for non-standard work requested by members. These are covered outside of this document and subject to periodic review. Such charges include requesting more than one Cash Equivalent Transfer Value and non-standard work relating to divorces.

Audit queries - charges for additional work

The Fund regularly receives queries from employers in relation to their own audits. Whilst the Fund does not object to providing information about it to help employers understand how the Fund operates and how it is constituted, such queries can take a significant amount of time to answer and take resource away from the day-to-day operation of the Fund.

The Fund is audited annually and publishes the annual report and accounts and audit certificate on the website. The Fund publishes a significant amount of information about the Fund, its activities and investments; and actuarial information is provided directly to employers.

Scheme Employers are urged to review the information on the Fund's website: https://www.eastsussexpensionfund.org, and, to consider the information published by the Local Government Association.

Where auditor queries still need to be referred to the Fund, we would ask that a single request with all queries is made. Work carried out to answer these queries will be recharged at a cost of £50 per hour for Officer time along with any costs incurred by the Fund. Such costs include, but are not limited to, Actuary fees.

Key Risks

The key risks to the delivery of this Strategy are outlined below. The Head of Pensions and other officers will work with the Pension Committee and the Pension Board in monitoring these and other key risks and consider how to respond to them in line with the Fund's Risk Management Policy.

- Lack or reduction of skilled resources due to difficulty retaining and recruiting staff members and staff absence due to sickness. This may include both the Administering Authority and Fund employers.
- Significant increase in the number of employing bodies causes strain on day-to-day delivery.

- Inadequate performance against service standards by the Administering Authority and/or Fund employers.
- Significant external factors, such as national change, impacting on workload.
- Incorrect calculation of members' benefits, resulting in inaccurate costs.
- Employer's failure to provide accurate and timely information resulting in incomplete and inaccurate records. This leads to incorrect valuation results and incorrect benefit payment.
- Failure to administer the scheme in line with regulations as listed under 'Regulatory Basis' in this Statement. This may relate to delays in enhancement to software or regulation guidance.
- Failure to maintain records adequately resulting in inaccurate data.
- Unable to deliver an efficient service to pension members due to system unavailability or failure
- Failure to maintain employer contact database leading to information being sent to incorrect person.

Consultation and review process

This Strategy was approved on TBC by the East Sussex Pension Committee. It is effective from TBC. It will be reviewed annually by both Officers and the Pension Board and updated at least every three years or less if required, taking account of any changes to the LGPS or other relevant Regulations or Guidance.

In preparing this updated Strategy, the Fund has consulted with its scheme employers; the scheme member and employer representatives on the East Sussex Pension Board; and other persons considered appropriate. Further consultation will be undertaken should any substantial changes be proposed to this Strategy following its approval by the Pensions Committee.

The latest version of this Strategy will always be available on the Fund website: https://www.eastsussexpensionfund.org/forms-and-publications/

Contact details

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Appendix A - Scheme Manager Responsibilities

Governance

| Administering Authority responsibilities | Timeframes/deadlines |
|--|--|
| Review the Fund's pension administration strategy and consult with all scheme employers. | The Pensions Administration Strategy will be formally reviewed no less frequently than every three years. A review may take place at any time where in the view of the Administering Authority it is necessary to do so. |
| Review the Fund's funding strategy statement at each triennial valuation, following consultation with scheme employers and the Fund actuary. | Every three years in line with Fund valuation cycle. |
| Review the Fund's Communications Strategy | The Communications Strategy will be formally reviewed no less frequently than every three years. A review may take place at any time where in the view of the Administering Authority it is necessary to do so. |
| Review the Fund's governance compliance statement. | The Governance Policy Statement will be formally reviewed no less frequently than every three years. A review may take place at any time where in the view of the Administering Authority it is necessary to do so. |
| Draft, maintain and publish all the policies and strategies that govern the pension fund, liaising with Employing Authorities as required. | Policies will be reviewed no less frequently than every three years. A review may take place at any time where in the view of the Administering Authority it is necessary to do so. |
| Publish the Fund's annual report and financial statement. | To be published annually. |
| Draft, maintain and publish all the policies and strategies that govern the pension fund, liaising with Employing Authorities and the Administrator as required. | Policies will be reviewed no less frequently than every three years. A review may take place at any time where in the view of the Administering Authority it is necessary to do so. |

Transfers – transfers in and transfers out

| Administering Authority responsibilities | Timeframes/deadlines |
|---|---|
| For transfers in, ensure that the Administering Authority has in place an appropriate discretionary policy setting out their policy on whether they choose to extend the I2-month time limit for accepting transfers in, where the decision falls to them. | This is contained within the Discretionary Policy of the Administering Authority. |
| For transfers out, to determine necessary action on how to proceed with transfer cases that have been flagged as at risk of being a pension liberation/fraud case. This may include, but not be restricted to, indicating whether the transfer is to be paid or whether legal advice is sought. | Any transfer cases referred to the Head of Pensions Administration by scheme administrators for suspected pension fraud will be thoroughly investigated and where appropriate secondary assurance sought from the scheme member. This should include all transfers to Qualifying Recognised Overseas Pension Scheme's (QROPS). The Administering Authority will then take appropriate action, which may include proceeding with the transfer, refusal to transfer or referral to Money and Pensions Service. While at the same time abiding by the deadlines set out in the relevant legislation. |

Transfers - Bulk transfers (ordinarly considered to be cases of at least 10 members)

| Administering Authority responsibilities | Timeframes/deadlines |
|---|--|
| Share information as appropriate with the Employing Authority regarding the timescales, negotiations, and where material, the financial consequences, and where possible, reach agreement with the Employing Authority on the stance adopted on any negotiations with the receiving Fund. | The Administering Authority will in these cases engage with all parties as early as possible. The Fund will look treat each case on its own merits and consider in line with the principals detailed in the Fund's Funding Strategy Statement. |
| Ensure the provision of the Regulations are met, including the rights of the transferring members | The Administering Authority will comply with the deadlines set out in legislation as applies at the time. |

Complaints and breaches

| Administering Authority responsibilities | Timeframes/deadlines |
|--|---|
| Appoint a nominated person to consider disputes under stage I of the IDRP process for disputes for any decisions/lack of decisions which need to be made by the administering authority. | Stage I complaints to be determined by the Administering Authority will be considered by the Head of Governance & Compliance. |

| Administering Authority responsibilities | Timeframes/deadlines |
|--|--|
| Appoint a nominated person to consider disputes under stage 2 of the IDRP process. | Stage 2 complaints to be determined by the Administering Authority will be considered by the Solicitor and Monitoring Officer. |
| Consider and respond to disputes made under stage I and/or stage 2 of the IDRP within statutory timeframes as set out in the LGPS Regulations 2013. | Response to disputes under stage I and 2 of the IDRP will be provided within the statutory deadline of two months and monitored by the Head of Governance & Complaince. |
| Prepare and maintain a Policy showing how to identify, record and report breaches of the Law. | The Fund Breaches Policy will be formally reviewed no less frequently than every three years. A review may take place at any time where in the view of the Administering Authority it is necessary to do so. |
| Maintain a Breaches Log detailing all known breaches of the law, whether these are considered immaterial and hence only recordable or whether they are considered material and reported to the Pensions Regulator. | This will be maintained on an ongoing basis by the Administering Authority. |
| Present the Breaches Log to the Pension Committee and the Pension Board at each meeting | To be presented at each meeting of the Board and Committee. |

Finance, accounting and reporting

| Administering Authority responsibilities | Timeframes/deadlines |
|--|--|
| Consult with employing authorities on the outcomes of the triennial valuation. | To be carried out every three years in line with the Fund valuation timetable. |
| Carry out termination valuations on admitted bodies or employing authorities who cease their participation in the Fund. | To be carried out as and when required. |
| Carry out accounting and financial reporting on behalf of the administering authority, including liaison with any third-parties, including: - Management, preparation and presentation of the Fund's annual report and accounts. - Further accounting and cash-flow reporting throughout the scheme year. - Cashflow forecasting. - Liaising with internal and external auditors. - Quarterly management accounts. - Raising invoices on behalf of the Fund. - Recording and maintaining all accounting records in line with record retention policies. | To be carried out as and when required. |

Contributions

| Administering Authority responsibilities | Timeframes/deadlines |
|--|--|
| Notify employing authorities of their contribution requirements for three years effective from the April following each actuarial valuation. | To be carried out every three years in line with the Fund valuation timetable. |
| Notify new employing authorities of their contribution requirements. | To be carried out as and when required. |

Employer services and monitoring

| Administering Authority responsibilities | Timeframes/deadlines |
|---|--|
| Provide support to employing authorities through a dedicated employer area of the pension fund website, technical notes, employer bulletins and day to day contact. | Web content available to employers will be reviewed on no less than an annual basis. Employer newsletters will be issued in line with the Communications Strategy. |
| Provide training sessions on employing authorities' roles and responsibilities. | To be delivered as and when required. |
| Monitoring of employers, including reporting of key metrics. This may include monitoring employers who have a very small number of active members remaining and may therefore cease participation or highlighting significant changes in membership numbers indicating a restructuring exercise or other event that requires the attention of the administering authority. | Ongoing basis |
| Monitor the existence of indemnity bond cover for employers, including highlighting to the administering authority where bond cover is either outdated, soon to expire or needs to be reviewed in line with administering authority policies. This may involve further communication with the Fund actuary or other party to obtain updated levels of recommended bond cover where appropriate. | Bonds in place for admission body employers will be reviewed in line with the individual agreements and the Funding Strategy Statement. |
| Maintain an updated record of further information relating to employers, for example, whether another employer has agreed to act as a guarantor for that employer, or any other information determined by the administering authority to be relevant. | Ongoing basis |

| Administering Authority responsibilities | Timeframes/deadlines |
|--|--|
| Review the IRMPs appointed and used by Employing Authorities meet legislative requirements to advise on ill health retirement applications | To collect a complete list prior 31 March 2026, and repeat no less than every three years. |

New and ceasing employers

| Administering Authority responsibilities | Timeframes/deadlines |
|---|---|
| Assist in the preparation and communication of admission agreements to new employers in the Fund, including liaising with the relevant employers, procurement departments, legal and the Fund actuary, as required, to prepare the necessary documentation. | Potential new employers in the Fund should engage with the administering authority at the earliest opportunity to allow adequate time for an assessment of the employer contribution rate and bond (where necessary). Where this is a result of an outsourcing of employees under TUPE from an existing scheme employer, engagement with the Administering Authority should be sufficiently early to allow pensions information to be included in the tender documentation. |
| Obtain a signed agreement and/or keep these on record on behalf of the administering authority. | The Admission Agreement should be completed with the commercial contract and no later the date of admission. However, where this is not achieved, complete as soon as possible. |
| Provide technical advice, guidance or support in relation to new or existing admission agreements and the operation of these with employers. | To be provided as and when required. |
| Assist in managing the cessation of an employer, including liaising with them in relation to any cessation debt due to the Fund or surplus to be returned to the scheme employer. | Any deficit or surplus due at the point an employer exists the Fund will be communicated to the former scheme employer in line with the requirements of regulation 64 of The Local Government Pension Scheme Regulations 2013. |

Additional Voluntary Contributions

| Administering Authority responsibilities | Timeframes/deadlines |
|---|--|
| Ensure a process is in place to periodically review AVC providers/fund options. | A full formal review of the AVC provider to the Fund will take place no less than every 5 years. Informal reviews may also take place on an annual basis in conjunction with the Fund actuary. |

| Administering Authority responsibilities | Timeframes/deadlines |
|--|---|
| Ensure that the member receives an annual statement, and that this statement meets statutory requirements. | Annual statements are distributed directly to individuals by the AVC provider on an annual basis. |

Additional Pension Contributions

| Administering Authority responsibilities | Timeframes/deadlines |
|--|---|
| Agree that any requests to pay additional contributions satisfy the administering authorities' discretionary policy in respect of additional contributions (e.g. whether a member is required to undertake a medical before entering into an additional contributions contract and determining whether the request is impractical) | To be agreed with the scheme administrator. |

Retirements

| dministering Authority responsibilities | imeframes/deadlines |
|--|---|
| Where a deferred member requesting early payment of their pension benefits and requesting that their Rule of 85 is to be applied and/or whether their reductions are to be waived, whose former employer no longer contributes within the East Sussex Pension Fund: | pplications will be considered by the Section 151 Officer on behalf of the Administering Authority and confirmed to the scheme administrator. |
| Consider the application and confirm to the decision to the member. Notify the administrator whether the Ro85 is to apply/reductions are to be waived or not. | |
| Where a deferred member requesting early payment of their pension benefits due to ill health, whose former employer no longer contributes within the East Sussex Pension Fund: | pplications will be considered by the Section 151 Officer on behalf of the Administering Authority and confirmed to the scheme administrator. |
| arrange for the member to be assessed by an IRMP, provide confirmation to the administrator that the employee meets all the conditions for ill-health retirement, as defined by the relevant LGPS regulations, and confirm the retirement date and a complete and correct ill-health certificate completed by the IRMP | |

| dministering Authority responsibilities | imeframes/deadlines |
|---|--|
| Where the member is in receipt of an ill health pension made under Tier 3, and the former employer has subsequently ceased to be a contributing employer within East Sussex Pension Fund, arrange for the member to be reassessed by an IRMP after 18 months and determine whether the pension should continue, or be subject to an uplift. | rrangements for reassessment will be made by the Section 151 Officer on behalf of the Administering Authority. |

Deaths

| Administering Authority responsibilities | Timeframes/deadlines |
|--|---|
| Review where necessary information provided by the administrator in relation to potential death grant lump sums and dependant pensions and provide written agreement for payments to be made, where necessary. | The determination of death grant beneficiaries will be in line with the Fund policy. The decision is delegated to the scheme administrator but for more complicated cases that will be referred to the Administering Authority for determination on a case by case basis. |
| Review the Administrator's policy annually in relation to the payment of death grant lump sums and ensure this is regularly reviewed and updated if necessary. | The policy on payment of death grant lump sums will be reviewed no less than every three years. |

Communications

| Administering Authority responsibilities | Timeframes/deadlines |
|---|--|
| Liaise with Officers to agree on newsletter (and other communication) content | This will be done and timetabled in line with the Communications Strategy of the Fund. |
| Liaise with Officers to agree on content of surveys | This will be done and timetabled in line with the Communications Strategy of the Fund. |
| Liaise with Officers to agree on structure / content of presentations / workshops | This will be done and timetabled in line with the Communications Strategy of the Fund. |

REFERENCE MADE WITH LINK TO THE COMMS STRAT IN ORDER THAT WE CAN SATISFY 59(D) WHICH SAYS WE SHOULD DETAIL PROCEDURES FOR IMPROVING THE COMMUNICATION BY THE ADMINISTERING AUTHORITY AND ITS SCHEME EMPLOYERS TO EACH OTHER OF INFORMATION RELATING TO THOSE FUNCTIONS

Appendix B - Service Standards for Pension Administration

Overview and purpose

Under the Local Government Pension Scheme (LGPS) (Administration) Regulations 2013, East Sussex County Council has a statutory responsibility to administer and manage the East Sussex Pension Fund (the Fund, ESPF) on behalf of all employers participating in the Fund and all past and present members, including their dependants.

The Fund will ensure that it meets its statutory responsibilities and that members and employers receive a cost-effective and high-quality service by delivering to these service standards. A report is presented at Pension Board and Pension Committee quarterly to provide oversight and governance of administration activity and projects including performance against an approved service level agreement. The Fund also publish performance against prescribed Key Performance Indicator in its Annual Report.

General administration overview

The main services provided include maintenance of Scheme Members' records, calculation and payment of retirement benefits including premature retirement compensation, transfers of pension rights, calculation of annual pension increases and the provision of information to scheme members, employers, the Fund's actuary and other relevant third parties.

- Pensions Administration
- Projects
- Technical & Compliance
- System Support
- Training & Development
- Help Desk

Legal timescales

The table below contains a list of key processes and the legal timescales in which they must be met.

| Process | Legal requirement |
|--|---|
| To process new member information – i.e. create a new pension record and provide basic scheme information to the member. | Within one month of the date of receiving jobholder information from the scheme employer, extended to two months where correct jobholder information has not been received. |
| Notify members and beneficiaries of material alteration to basic scheme information | Within 3 months |
| Provide a Cash Equivalent Transfer Value (CETV) to | Within three months of the date that the request is made by the member. |

| Process | Legal requirement |
|--|---|
| the member, including for divorce purposes. | Or, in divorce cases, such shorter deadline as specified in a valid court order where reasonable. |
| Pay a CETV following a member's election to transfer. | Within six months of the guarantee date, or within six months of the member's request if CETV not guaranteed. This is subject to "red flags" which prevent the transfer under current legislation. |
| Inform member or prospective member whether they are entitled to acquire transfer credits in exchange for a cash equivalent or any transfer payment provided from another Scheme | Within two months of the request being made unless such a request has been made in the last twelve months |
| Notify HMRC when a transfer payment is made to a QROPS. | Within 60 days of the date the transfer payment is made. |
| Notify members who rejoin the scheme and have previous LGPS benefits of their rights and options. | In sufficient time to allow the member to make an election within 12 months of re-joining. |
| Aggregation of deferred benefit with active pension account | Within I2 months of the active account being opened unless the member makes an election to retain separate accounts |
| Notify members of the transfer credits available in respect of a CETV or transfer payment from a previous pension arrangement (TV-in). | Within two months of the date of the member's request, unless already provided within the previous 12 months. This includes obtaining the transfer value from the previous provider and informing member of transfer options. |
| Provide information for divorce purposes which does not include a CETV. | Within one month of the date the request is made by the member, their spouse/partner, or the Court. |
| Implement a Pension Sharing Order. | Within four months of the effective date of the Order, or the date on which all the relevant information is received. |
| Inform members who leave the scheme before their normal pension age of their rights and options. | Within two months of the date of initial notification from the scheme employer, or the request from the member. |
| Provide refund of contributions where a member leaves without meeting the vesting period (currently two years) | Within two months of the request being made. |

| Process | Legal requirement |
|--|--|
| Notify the member of the amount of retirement benefits. | Within one month of the date of retirement, if retiring on or after normal pension age. Within two months of the date of retirement, if retiring before normal pension age. |
| Notify member of change in the amount of benefit when already in payment | Before the date on which the decision to alter the benefit takes effect or within one month of that date |
| Notify the dependent(s) of the amount of death benefits payable. | Within two months of the date of becoming aware of the member's death, or of the date of request for information from a third party. |
| Make payment of any death grant. | Within two years of the date of becoming aware of the member's death. |
| Provide annual benefit statements to all active, deferred, pension credit and deferred pensioner members. | By 31 st August of each year. |
| Provide pensions savings statements to all members who exceed the annual allowance. | By 6 October following the end of each tax year. |
| Notify members (or dependents) of the lump sum allowance used up by a Benefit Crystallisation Event (BCE). | Within three months of the BCE date and on an annual basis for Fund pensioners |
| Submit the annual event report to HMRC. | By 31 January following the end of each tax year. |
| Submit quarterly accounting for tax returns to HMRC, including details of all: • Short service refund lump sum charges • Lifetime allowance charges • Special lump sum death benefit charges • Serious ill-health lump sum charges • Authorised surplus | By 15 May, 14 August, 14 November and 14 February each year. |

| Process | Legal requirement |
|---|---|
| payments charges Annual allowance charges Overseas transfer charges | |
| Issue P60s to all pensioner members. | By 31 May following the end of each tax year. |
| Issue P14/P35 to HMRC. | By 19 May following the end of each tax year. |
| Submit full payment submission (FPS) to HMRC. | On or before each monthly pay date. |
| Pay tax owed to HMRC. | By the 22 nd of each month. |
| Respond to an IDRP Complaint. | Within two months of receiving the Stage One complaint or Stage Two appeal. |
| Provide copy of Scheme Documents including Annual Report | Within two months of request |

Administration Service Level Agreement

The table below contains a list of pensions administration processes, and the target timeframe for each. The Fund monitors and reports its performance against these targets in a quarterly administration performance report to both the Pension Board and Committee.

| Task | Target timeframe (working days) |
|---|--|
| Aggregation- Payment | 10 days |
| Aggregation- Quote | 15 days |
| APC/AVC's | 10 days |
| Deaths – initial letter acknowledging death of member | 2 days |
| Deaths- With Benefits | 5 days |
| Deaths-No Further Benefits | 5 days |
| Deferred Benefits | 15 days |
| Divorce Quotes | 15 days |
| Divorce - Proceeding | 25 days |
| General Enquiries | 10 days |

| Interfund in- Payment | 25 days |
|--|------------|
| Interfund In- Quote* | 10/15 days |
| Interfund Out- Payment | 25 days |
| Interfund Out- Quote | 15 days |
| Recalculations | 20 days |
| Refunds- Frozen | 10 days |
| Refunds- Payment | 5 days |
| Retirements – letter notifying actual retirement benefits | 7 days |
| Retirements – letter notifying estimate of retirement benefits | 15 days |
| Retirements – process and pay pension benefits on time | 5 days |
| Transfer In- Payment | 10 days |
| Transfer In- Quote | 10 days |
| Transfer Out- Payment | 10 days |
| Transfer Out- Quote | 10 days |
| Trivial Commutation | 10 days |
| | |

The tasks detailed above are categorised into 5 priorities, where one is the highest priority casework and 5 the lowest. These are reflected with the following colours:

| Priority I | |
|------------|--|
| Priority 2 | |
| Priority 3 | |
| Priority 4 | |
| Priority 5 | |

The performance against these targets, as explained above, is reported to the Pension Board and Pensions Committee on a quarterly basis, with a separate report for the performance each month. Performance is summarised on a traffic light basis for each task listed:

| Traffic Light Rating | Percentage processed within the target timeframe |
|----------------------|--|
| Green | Over 92% |
| Amber | Over 87% but less than 92% |
| Red | Less than 87% |

Annual Report – Key Performance Indicators (KPI's)

Regulation 57 of The Local Government Pension Scheme Regulations 2013 requires Administering Authorities to prepare a report in relation to each financial year. The pension fund annual report must be published no later than Ist December following the end of the relevant year, and must contain:

- a report about the management and financial performance during the year of each of the pension funds maintained by the authority;
- a report explaining the authority's investment policy for each of those funds and reviewing the performance during the year of the investments of each fund;
- a report of the arrangements made during the year for the administration of each of those funds;
- for each of those funds, a statement by the actuary who carried out the most recent valuation of the assets and liabilities of the fund in accordance with regulation 62 (actuarial valuations of pension funds), of the level of funding disclosed by that valuation;
- the current version of the statement under regulation 55 (governance compliance statement);
- for each of the funds, the fund account and net asset statement with supporting notes and disclosures prepared in accordance with proper practices;
- · an annual report dealing with-
- the extent to which the authority and the Scheme employers in relation to which it is the administering authority have achieved any levels of performance set out in a pension administration strategy in accordance with regulation 59 (pension administration strategy), and
- such other matters arising from a pension administration strategy as it considers appropriate;
- the current version of the statement referred to in regulation 58 (funding strategy statement);
- the current version of the investment strategy under regulation 7 (investment strategy statement) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016;
- the current version of the statement under regulation 61 (statements of policy concerning communications with members and Scheme employers); and
- any other material which the authority considers appropriate.

In preparing and publishing the pension fund annual report, East Sussex Pension Fund must have regard to guidance given by the Secretary of State. With effect from the year 2024/2025, the guidance requires the Fund to report on a prescribed list of KPI's. These are:

Table A – Total number of casework

| REF | Casework KPI | Number |
|-----|--|--------|
| ΑI | Deaths recorded of active, deferred, pensioner and dependent | |
| | members | |
| A2 | New dependent member benefits | |
| A3 | Deferred member retirements | |
| A4 | Active member retirements | |
| A5 | Deferred benefits | |
| A6 | Transfers in (including interfunds in and club transfers) | |
| A7 | Transfers out (including interfunds in and club transfers) | |
| A8 | Refunds | |
| A9 | Divorce quotations issued | |
| AI0 | Actual divorce cases | |
| AII | Member estimates requested by scheme member or employer | |
| AI2 | New joiner notifications | |
| AI3 | Aggregation cases | |
| AI4 | Optants out received after 3 months membership | |

For the casework detailed in table A, the Fund must confirm:

- The total number of cases open as at 31st March (the starting position)
- The total number of new cases created in the year 1st April to 31st March
- The total number of cases completed in the year
- The total percentage of cases completed in the year
- The total number of cases completed in the previous year
- The total percentage of cases completed in the previous year

Table B - Time taken to process casework

| REF | Casework KPI | Suggested fund target* |
|-----|--|------------------------|
| ВІ | Communication issued with acknowledgement of death of active, deferred, pensioner and dependent member | 5 days |
| B2 | Communication issued confirming the amount of dependents pension | 10 days |
| В3 | Communication issued to deferred member with pension and lump sum options (quotation) | 15 days |
| B4 | Communication issued to active member with pension and lump sum options (quotation) | 15 days |
| B5 | Communication issued to deferred member with confirmation of pension and lump sum options (actual) | 15 days |
| В6 | Communication issued to active member with confirmation of pension and lump sum options (actual) | 15 days |
| В7 | Payment of lump sum (both actives and deferreds) | 15 days |
| B8 | Communication issued with deferred benefit options | 30 days |
| В9 | Communication issued to scheme member with completion of transfer in | 15 days |

| REF | Casework KPI | Suggested fund target* |
|-----|--|------------------------|
| BI0 | Communication issued to scheme member with completion of transfer out | 15 days |
| BII | Payment of refund | 10 days |
| BI2 | Divorce quotation | 45 days |
| BI3 | Communication issued following actual divorce proceedings i.e application of a Pension Sharing Order | 15 days |
| BI4 | Communication issued to new starters | 40 days |
| B15 | Member estimates requested by scheme member and employer | 15 days |

^(*) Days in this column are a suggested fund target for completion and not the statutory timescale.

For the casework detailed in table B, the Fund must confirm:

- The percentage completed within the fund target in year
- The percentage completed within the fund target in the previous year

Table C - Communications and Engagement

| REF | Engagement with online portals | Number / % |
|-----|---|------------|
| CI | Percentage of active members registered | |
| C2 | Percentage of deferred members registered | |
| C3 | Percentage of pensioner and survivor members registered | |
| C4 | Total percentage of all scheme members registered for self-service | |
| C5 | Number of registered users by age | |
| C6 | Percentage of all registered users who have logged on in the last 12 months | |

| REF | Communication | Number |
|-----|---|--------|
| C7 | Total number of telephone calls received in year | |
| C8 | Total number of email and online channel queries received | |
| C9 | Number of scheme member events held in year (total of in-person and online) | |
| CI0 | Number of employer engagement events held in year (in-person and online) | |
| CII | Number of active members who received a one-to-one (in-person and online) | |
| CI2 | Number of times a communication (i.e newsletter) issued to: a) Active members b) Deferred members c) Pensioners | |

Table D - Administration Resources

| REF | Resources | Number / % |
|-----|--|------------|
| DI | Total number of all administration staff (FTE) | |
| D2 | Average service length of all administration staff | |
| D3 | Staff vacancy rate as a percentage | |
| D4 | Ratio of all administration staff to total number of scheme members (all staff including management) | |
| D5 | Ratio of administration staff (excluding management) to total number of scheme members | |

Table E - Data Quality

| REF | Annual Benefit Statements | % |
|-----|--|---|
| EI | Percentage of annual benefit statements issued as at 31 August | |

| E2 | Short commentary if less than 100% |
|----|------------------------------------|
| | |

| REF | Data Category | Number / % |
|-----|---|------------|
| E3 | Common data score | |
| E4 | Scheme specific data score | |
| E5 | Percentage of active, deferred and pensioner members recorded as 'gone away' with no home address held, or address is known to be out of date | |
| E6 | Percentage of active, deferred and pensioner members with an email address held on file | |

| REF | Employer Performance | |
|-----|---|--|
| E7 | Percentage of employers set up to make monthly data submissions | |
| E8 | Percentage of employers who submitted monthly data on time during | |
| | the reporting year | |

Breaches and complaints

The management of breaches are in full compliance with the Funds Breaches Policy which is published on the Fund website.

The Fund will maintain a record of all complaints received (verbally and in writing) and operate a local complaints resolution procedure that all staff will be aware of. The number of complaints received will be included in the administration report.

The Fund maintain and publish an Internal Dispute Resolution Procedure (IDRP) in accordance with LGPS regulations and will pass any stage I and stage 2 cases to the relevant nominated person as soon as possible. All IDRP cases received will be included in the quarterly reporting to Pension Board and Pension Committee.

| Process | Administration standards |
|------------------|--|
| Breaches | Logged within I working day and reported to Head of Pension Fund within 2 working days of breach occurring. |
| Complaint | Logged within 2 working days |
| Error & Omission | Logged within 2 working days |
| IDRP cases | Logged within I working day and reported to Head of Governance & Compliance within I working day of receipt of IDRP case |

Communications

The table below shows a list of communications not covered by legal timescales that the Fund will produce and distribute and the timescales in which this will be done. The Fund has a detailed Communications Strategy published on the Fund website.

| Communication | Administration standards |
|--|--|
| Notify all pensioner and dependent members of the annual increase to their pension. | By 30th April following the end of each tax year. |
| Employer survey Issue an annual survey to all employers in the Fund. | Issued annually to employers at the employer Forum held at in November each year. |
| Member surveys Issue an annual survey to Fund members. | Survey issued bi-annually to active, deferred and pensioner members. |
| Pensioner newsletter Produce and distribute a newsletter to all members in receipt of a pension. | Issued annually to all pensioners. |
| Active and deferred member newsletter Produce and distribute a newsletter to all active and deferred members. | Active - Issued twice per year to all active members. |
| | Deferred – Issued annually to all deferred members. |
| Annual Benefits Statements | By 31 st August each year. |
| Website | Reviewed regularly. Update carried out by Communications Manager. |
| Valuation or data extract(s) for the Fund's Actuary | Data is provided to the Fund Actuary through the secure data portal in line with agreed valuation plans and timelines. |

Appendix C

Scheme Employer Responsibilities

Table I: Governance

| Employer responsibility | Timeframe |
|---|---|
| Designate a named individual as Pensions Liaison Officer, to be the main point of contact for the administrator or administering authority. | Within 30 days of becoming a scheme employer within the East Sussex Local Government Pension Fund or 30 days from date of request by the Scheme Administrator or |
| Complete authorised signatory forms to provide the administrator and administering authority with contact information for officers authorised to perform key administrative roles. | Within 30 days of becoming a scheme employer within the East Sussex Local Government Pension Fund or 30 days from date of request by the Scheme Administrator or |
| Appoint an independent registered medical practitioner (IRMP) qualified in occupational health medicine to consider all ill-health retirement applications and agree the appointment with the administering authority. Confirmation must be provided to the Administering Authority that the requirements to be an IRMP have been met. This information can be found in the Ill Health Early Retirement Guide produced by the Administering Authority and published on its website. | Within 90 days of becoming a scheme employer within the East Sussex Local Government Pension Fund or 90 days from date of request by the Scheme Administrator or Administering Authority. |
| Designate an appropriate person to make decisions on ill health early retirements and inform the Administering Authority of their identity, providing a specimen signature. | Within 30 days of becoming a scheme employer within the East Sussex Local Government Pension Fund or 30 days from date of request by the Scheme Administrator or Administering Authority. |
| Formulate, publish and keep under review policies in relation to all areas where the employer may exercise discretion within the scheme regulations. | Within 90 days of becoming a scheme employer within the East Sussex Local Government Pension Fund or 90 days from date of request by the Scheme Administrator or Administering Authority. |

| Employer responsibility | Timeframe |
|---|--|
| To provide the Fund with the details of the employer's s.151 Officer (or equivalent) or person with delegated authority, including a specimen signature, for the purposes of allowing the Administering Authority to check LGPS31 forms are authorized by the appropriate person. | Within 30 days of becoming a scheme employer within the East Sussex Local Government Pension Fund or 30 days from date of request by the Scheme Administrator or Administering Authority. |
| Notify the administering authority of any contracting out of services that will involve a TUPE transfer of employees to another organisation before the procurement exercise takes place. | Employers should inform the Administering Authority as soon as possible, enabling pension information to form part of the tender documentation. Notification should be in line with the published procurement guide. |
| Provide the administering authority with contact details for lead decision-making and operational officers where a prospective new employer or admitted body may request to join the Fund as a result of re-organisation or TUPE transfer. | Employers should inform the Administering Authority as soon as possible within the tender process, enabling pension information to form part of the tender documentation. Notification should be in line with the published procurement guide. |
| Work with the administering authority to establish an admission agreement. | Potential Admission Body Employer's, together with the letting employer should work closely with the Administering Authority, to ensure that Admission Agreements are completed alongside the commercial contract and no later than the contract start date. |
| Notify the administering authority where the employer ceases to admit new members or is considering ceasing participation in the Fund. | This should be done at the earliest opportunity, allowing the Administering Authority to liaise with the Fund actuary in order to achieve a well-managed employer exit from the Fund. |

Table 2: New Starters and auto-enrolment

| Employer responsibility | Timeframe |
|---|--|
| Enrol all eligible new employees into the scheme in accordance with the relevant LGPS regulations. | From the first available pay period. |
| Determine and deduct the appropriate rate of employee contributions, based on the current contribution rate banding table. | Immediately upon commencing Scheme membership, in line with employer's policy and as a minimum in each April thereafter. |
| Notify the administrator of all new starters. | Provide the Pension Section with details of all new entrants to the LGPS via the i-Connect upload or by the 10th of the month following entry for employers not using i-Connect. |
| Provide all eligible new employees with details about the scheme in the form of a copy of the key facts leaflet and/or directing them to the Fund's website. | To be provided to the employee within six weeks of the date on which the employee became a scheme member. |
| Enrol and re-enrol all eligible employees into the scheme in accordance with the auto- enrolment requirements of the Pensions Act 2008 and the relevant LGPS regulations. | This should be done for each pay period ensuring all non-members without a valid exclusion from auto-enrolment are enrolled or reenrolled into the LGPS. |
| Replicate the same process as above in New Starters section for those employees enrolled or re-enrolled into the scheme | N/A |
| When an election to move into or out of the 50/50 section is received from an employee, adjust the contribution rate accordingly and confirm to the member that this has been actioned. | Within one month of the date of change following receipt of a valid election to either move from the Main Section to 50/50 Section of the Scheme, or to move from the 50/50 Section to Main Section of the Scheme. This may be in the form of a pay advice notice. |

| Employer responsibility | Timeframe |
|---|--|
| Where an employee either goes onto nil pay due to sickness or injury or passes the automatic re-enrolment date, move the employee back into the main section of the scheme. | This should be done from the date of the relevant event detailed, and communicated to the employee within one month of the change. |
| Notify the administrator of all employees that move into and out of the 50/50 section via i-Connect or for employers not using i-Connect by spreadsheet on a monthly basis. | This should form part of the monthly submission to the Administering Authority. |

Table 3: Additional contributions

| Employer's responsibility | Timeframe |
|---|---|
| Distribute general information on the options available for paying additional contributions to employees, if requested to do so by the administrator or administering authority, both electronically and in paper format. | This should be distributed within one month of having received the instruction and documentation from the Scheme Administrator or Administering Authority. |
| Make the appropriate deduction of additional contributions on receipt of an election from a member, and confirm this has been actioned to both the member and Administrator | The deduction should take effect from the first available pay period (or date specified if later). The member and Scheme Administrator should then be informed within one month of the change. |
| Ensure and arrange for the correct deduction of APCs from pensionable pay throughout the length of the contract. | The deduction should take effect from the first available pay period (or date specified if later) and continue at the prescribed rate until the termination date or date active membership of the Scheme ceases if earlier. |
| Make payment of the APCs to the administering authority within the timescales agreed. | Scheme employers must pay over contributions to the Fund by the 19th of the month following the deduction. |

| Employer's responsibility | Timeframe |
|--|---|
| Provide a monthly breakdown of all APCs to the administrator/administering authority for reconciliation against payments received. | Submission of a LGPS31 should be made to the Fund prior to the payment and no later than 19th of the month following the deduction. |
| Ensure and arrange for the correct deduction of additional contributions from the member's pensionable pay. | The deduction should take effect from the first available pay period (or date specified if later) and continue at the prescribed rate until the termination date or date active membership of the Scheme ceases if earlier. |
| Ensure deductions of additional contributions commence and cease from the appropriate dates. | The deduction should take effect from the first available pay period (or date specified if later) and continue at the prescribed rate until the termination date or date active membership of the Scheme ceases if earlier. |
| Make payment of all additional contributions (excluding AVC's) to the administering authority within the timescales agreed. | Scheme employers must pay over contributions to the Fund by the 19th of the month following the deduction. |
| Provide a monthly breakdown of all other additional contributions to the administrator/administering authority for reconciliation | Submission of a LGPS31 should be made to the Fund prior to the payment and no later than 19th of the month following the |

| Employer's responsibility | Timeframe |
|--|--|
| Absence contributions The requirements below apply to all absences, including, but not limited to: • Child-related leave (e.g. maternity, paternity, adoption, parental leave); • Authorised unpaid leave (e.g. unpaid child-related leave); • Reserve forces leave; • Industrial action; • Jury service. | |
| Notify employees of the options available to pay additional contributions to cover benefits that have been reduced or lost due to periods of absence. | Member elections to purchase lost pension during a period of authorised unpaid leave must be made within 30 days of returning to employment (or a longer period as permitted by the employer). Employers must therefore provide details of the options available to employees, allowing sufficient time for an employee election to be made. |
| When an election to pay additional contributions to cover a period of absence has been received, arrange for the correct amounts to be deducted from the employee's pensionable pay. | Deduct the relevant contributions due within the first available pay period following receipt of a valid member election. |
| Make payment of all absence-related additional contributions to the administering authority within the timescales agreed. | Scheme employers must pay over contributions to the Fund by the 19th of the month following the deduction. |
| Provide a monthly breakdown of all absence-related additional contributions to the administrator/administering authority for reconciliation against payments received. | Submission of a LGPS31 should be made to the Fund prior to the payment and no later than 18th of the month following the deduction. |

Table 4: Award of additional pension

| Employer's responsibility | Timeframe |
|--|--|
| Ensure the appropriate additional pension decisions are communicated promptly to Administrator by one of the employing authority's authorised signatories. | Notification should be provided to the administrator within 5 working days of the resolution to award additional pension having been made. |
| Ensure the appropriate additional costs invoiced in relation to any award of additional pension are paid to the administering authority within the agreed timescale. | Payment of the invoice should be made within the stated terms. |

Table 5: Leavers not entitled to immediate payment of benefits

| Employer's responsibility | Timeframe |
|---|---|
| Notify the administrator of all employees who leave the scheme before retirement, via i-Connect or for employers not using i-Connect providing a complete and correct pensions leaver form, signed by one of the employing authority's authorised signatories. This must include the member's personal details, date of leaving, reason for leaving, and pay details as outlined below. Provide details of the contributions made by the employee and employer during the final scheme year and the previous scheme year, including any additional contributions. Provide details of the member's pensionable pay, as defined by the LGPS Regulations 2013, for the scheme year up to the date of leaving and for the previous scheme year. | To be provided within one calendar month of the date of leaving, in a format approved by the Administering Authority. |

| Employer's responsibility | Timeframe |
|--|---|
| - Where required, provide details of the member's final pay as defined by the | |
| LGPS (Benefits, Membership and Contributions) Regulations 2007. | |
| Where the member is entitled under the LGPS regulations to use a final pay that relates to a previous year, provide the previous two year's final pay | |
| figures or the best of the last 10 years' final pay figure, as required. | |
| - Where required, provide details of the hours the member worked up until the date of leaving and, if required by the administrator, details of historical hours changes for the member. | |
| Refund contributions through the payroll to any employee who opts out of the scheme with less than three months membership. | Within the first available pay period following receipt of a valid opt out. Provide the Scheme Administrator with details of all opt outs and a copy of the completed 'Opt out form' by the end of the calendar month following the last contribution deducted. |
| Provide additional information to assist in the accurate calculation of refunds of contributions, if required by the administrator. | To be provided within 10 working days from receipt of the request from the administrator. |
| Provide additional information to assist in the accurate calculation of deferred benefits, if required by the administrator. | To be provided within 10 working days from receipt of the request from the administrator. |
| Ensure an appropriate discretionary policy is in place setting out policy on whether they choose to extend the 12 month time limit for accepting transfers in. | This should form part of the discretionary policies made within 90 days of becoming a scheme employer within the East Sussex Local Government Pension Fund or 90 days from date of request by the Administering Authority. |

| Employer's responsibility | Timeframe |
|---|--|
| Work with the Administering Authority and the Fund Actuary in their negotiations to facilitate agreement on the terms for transfer. | By way of providing any additional information within 10 working days of receipt of the request. |

Table 6: Retirements

| Employer's responsibility | Timeframe |
|--|--|
| Notify the administrator of all employees who leave the scheme at a point where they are entitled to receive payment of their retirement benefits, whether voluntarily or because of a decision by the employing authority, by providing a complete and correct pensions leaver form, signed by one of the employing authority's authorised signatories. This must include the member's personal details, date of leaving, reason for leaving, and pay details as outlined below. Provide details of the contributions made by the employee and | Notify the administrator when a member is due to retire as soon as final earnings are known, typically 20 days prior to date of retirement and no later than 2 weeks after the date of leaving by the submission of a Leaver Notification. |
| during the final scheme year and the previous scheme year, including any additional contributions. | |
| Provide details of the member's pensionable pay, as defined by the LGPS Regulations 2013, for the scheme year up to the date of leaving and for the previous scheme year. | |
| - Where required, provide details of the member's final pay as defined by the | |
| LGPS (Benefits, Membership and Contributions) Regulations 2007. | |

| Employer's responsibility | Timeframe |
|--|--|
| - Where required, provide details of the hours the member worked up until the date of leaving and, if required by the administrator, details of historical hours changes for the member. | |
| - Provide confirmation that the employing authority has received details of the | |
| potential retirement costs and wishes to proceed with the retirement. | |
| - Provide confirmation to the member about the employing authority's decision, with appropriate justification if required. | |
| - Understand, and pay where applicable, the associated costs to the Administering Authority that apply if a decision is made to retire a member on the grounds of redundancy, business efficiency or ill health. | |
| Where the reason for leaving is voluntary early retirement, provide confirmation of whether the Rule of 85 is to be applied, whether any reductions to protected benefits are to be waived, whether any reductions to unprotected benefits are to be waived, and the amount of the reductions that are to be waived (if any). | Confirmation should accompany the Leaver Notification if not previously submitted. |
| Where the reason for leaving is flexible retirement, provide confirmation of whether any reductions to protected benefits are to be waived, whether any reductions to unprotected benefits are to be waived, and the amount of the reductions that are to be waived (if any). Where the reason for leaving is redundancy or efficiency retirement, provide a copy of the employee's notice letter. | Confirmation should accompany the Leaver Notification if not previously submitted. |

| Employer's responsibility | Timeframe |
|---|--|
| Where the reason for leaving is ill-health retirement, arrange for the member to be assessed by an IRMP that has been certified by the Administering authority, provide confirmation that the employee meets all the conditions for ill-health retirement, as defined by the relevant LGPS regulations, provide confirmation of which tier of benefits is to be awarded, and enclose a copy of the notice letter and a complete and correct ill-health certificate completed by the IRMP. | Confirmation should accompany the Leaver Notification if not previously submitted. |
| Where the member is in receipt of an ill health pension made under Tier 3, arrange for the member to be reassessed by an IRMP after 18 months and determine whether the pension should continue, or be subject to an uplift. | Scheme employers should notify the administrator of the outcome of a Tier 3 III Health Review as within 5 working days of the determination. |

Table 7: Deaths

| Employer's responsibility | Timeframe |
|---|--|
| Notify the administrator of all employees who die while an active member of the scheme, by providing a complete and correct pensions leaver form, signed by one of the Employing Authority's authorised signatories. This must include the member's personal details, date of leaving, reason for leaving, and pay details as outlined below. | Notify the administrator as soon as possible of the death and provide a Leaver Notification within 5 workings days of the death. |
| Provide details of the contributions made by the employee and employer during the final scheme year and the previous scheme year, including any additional contributions. | |

| Employer's responsibility | Timeframe |
|--|-----------|
| Provide details of the member's pensionable pay, as defined by the LGPS Regulations 2013, for the scheme year up to the date of leaving and for the previous scheme year. | |
| - Provide details of the member's Assumed Pensionable Pay (APP), as defined by the LGPS Regulations 2013 as at the date of death. | |
| Where required, provide details of the member's final pay as defined by the | |
| LGPS (Benefits, Membership and Contributions) Regulations 2007. | |
| Where required, provide details of the hours the member worked up until the date of death and, if required by the administrator, details of historical hours changes for the member. | |
| - Provide additional information to assist in the accurate calculation of death benefits, if required by the administrator. | |

Table 8: Pension Sharing Orders

| Employer's responsibility | Timeframe |
|---|--|
| Provide the administrator with information as requested to enable them to carry out the order. This may include, but is not restricted to: | Details should be provided to the administrator within 10 working days of the request. |
| Providing details of the member's pensionable pay, as defined by the LGPS Regulations 2013, for the scheme year up to the date of leaving and for the previous scheme year. | |
| - Where required, provide details of the member's final pay as defined by the | |
| LGPS (Benefits, Membership and Contributions) Regulations 2007. | |

Table 9: Complaints, errors and breaches

| Employer's responsibility | Timeframe |
|--|---|
| Appoint a nominated person to consider disputes under stage I of the IDRP process and provide up to date contact details to the administering authority and administrator. | Within 90 days of becoming a scheme employer within the East Sussex Local Government Pension Fund or 90 days from date of request by the Administering Authority. |
| Notify the administering authority of the receipt of any complaint under the IDRP process. | Within 5 working days of receipt of the complaint. |

| Employer's responsibility | Timeframe |
|--|--|
| Consider and respond to disputes made under stage I of the IDRP within statutory timeframes as set out in the LGPS Regulations 2013. | Where the complaint is in relation to an act or omission of the scheme employer, the appointed person to consider disputes under stage I of the IDRP process by the employer, should respond within the statutory deadline of 2 months beginning with the date on which the IDRP application was received. |
| Notify the administering authority when a stage I decision has been issued. | A copy of the response should be provided to both the complainant and the Administering Authority within the 2-month period. |
| Fully cooperate with all stages of any complaint investigation, including the provision of data, information or technical assistance to any relevant party (including external parties such as the Pensions Ombudsman) as required, to ensure the efficient resolution of any complaint. | By way of providing any additional information requested within 10 working days of receipt of the request. |
| Be aware of the Fund's Breaches Policy and Reporting Procedures, and of each party's responsibilities in relation to this. | The East Sussex Pension Fund Breaches Policy was agreed by the Pensions Committee and is published on the Fund website. Employers should take time to familiarise themselves with this |
| Liaise and cooperate appropriately with any investigation into any potential breaches, including with the Administering Authority and the Administrator, and provide such information as is requested. | By way of providing any additional information requested within 10 working days of receipt of the request. |

Table 10: Data quality and record keeping

| Employer's responsibility | Timeframe |
|--|--|
| Ensure that robust controls are in place for collecting good quality data and, where a data improvement plan has been implemented, liaise with the Administrator and the Administering Authority as appropriate to meet key milestones and to ensure and demonstrate progress against that plan. | N/A |
| Ensure that pension related information is archived in such a way as to ensure it is accessible for as long as it may be needed. | N/A |
| Ensure the year end return, (I April to 31 March) is provided to the administrator in the prescribed format, a template of which will be issued in advance of the year end. | The return must be submitted no later than 30th April following the end of the preceding scheme year. A late or incorrect return will directly affect your employees, as until the year end data has been reconciled, an annual benefit statement may not be issued. |
| Where the employer has been onboarded onto the I-Connect system, ensure member data is uploaded each month in line with the instructions provided. | Data should be received no later than 19th day of the following month. A late or incorrect submission will affect your employees as the Fund will not hold accurate data about them and this may impact information provided about their benefit entitlements. |
| Provide a response to any queries raised in relation to the year end return. | Provided to the administrator / Administering Authority within 10 working days of receipt of the request. |

Table II: Communications

| Employer's responsibility | Timeframe |
|---|--|
| Distribute any information provided by the administering authority or administrator to members or potential members (e.g. scheme guides and newsletters). | All material provided to scheme employers should be distributed to the relevant employees with 15 working days of receipt. |
| Ensure that the administrator is provided with requisite information to enable them to produce an ABS | Any additional data required by the administrator for the purpose of issuing an Annual Benefit Statement, should be provided within 10 working days of receipt of request. |

Table 12: Pensioner payroll services

| Employer's responsibility | Timeframe |
|--|--|
| Where the member is in receipt of an ill health pension made under Tier 3, arrange for the member to be reassessed by an IRMP after 18 months and determine whether the pension should continue, or be subject to an uplift. | Scheme employers should notify the administrator of the outcome of a Tier 3 III Health Review as within 5 working days of the determination. |
| To notify the administrator as soon as practically possible after identifying any irregularity that could contribute to the member being over or underpaid (e.g. an audit review of completed leaver forms may identify an incorrect pay value stated and issued to the administrator in respect of a pensioner) | Scheme employers should notify the administrator within 5 working days of having discovered the irregularity. |

Table 13: Finance and accounting

| Employer's responsibility | Timeframe |
|--|--|
| Make payment of additional fund strain costs in relation to early payment of benefits from flexible retirements, redundancy or efficiency retirements, or early retirements with employer consent, upon receipt of an invoice from the administrator or administering authority. | Payment of the invoice should be made within the stated terms. |
| Make payment of recharge amounts in respect of compensatory added years, where appropriate. | Payments to be made on a monthly basis and detailed on the LGPS31 Form submitted to the Administering Authority. |
| Make payments in respect of accounting work carried out on behalf of the employing authority by the Fund actuary or the administering authority's accounting team, upon receipt of an invoice from the administrator or administering authority. | Payment of the invoice should be made within the stated terms. |
| Make payments in respect of any other work carried out by the administrator, administering authority or Fund actuary on behalf of the employing authority, upon receipt of an invoice from the administrator or administering authority. | Payment of the invoice should be made within the stated terms. |
| Ensure the correct employee contribution rate is determined each scheme year in line with the appropriate contribution banding table. | An assessment should be made by all scheme employers every April to ensure all employee contribution deductions are made in line with the revised employee contribution bandings issued. |
| Ensure the correct deduction of contributions from employees' pensionable pay, including any period of child-related leave, trade dispute, or other absence. | N/A |

| Employer's responsibility | Timeframe |
|--|---|
| Apply changes to employer contribution rates as instructed by the administering authority at the date specified by the Fund actuary. | Apply from the first available pay period (retrospectively if required) or the date specified by the actuary if later, following receipt of an instruction from the Administering Authority. |
| Ensure employer and employee contributions are paid across in a timely manner and in the agreed format. | Scheme employers must pay over contributions to the Fund by the 19th of the month following the deduction. Submission of a LGPS31 should also be made to the Fund prior to the payment and no later than 18th of the month following the deduction. |
| | Failure to pay contributions or submit the LGPS31 by the prescribed deadline may result in additional charges being levied against the employer. Where considered to be of material significance the Fund will consider a referral to The Pensions Regulator in line with their Code of Practice 14 or any future Code of Practice that comes into force. |

Table 14: Employer services

| Employer's responsibility | Timeframe |
|--|--|
| Distribute all supporting material supplied by the administrator or administering authority to relevant staff and ensure attendance at employer training sessions. | All material provided to scheme employers should be distributed to the relevant employees with 15 working days of receipt. |

Table 15: Pensions Taxation

| Employer's responsibility | Timeframe |
|--|--|
| Ensure that the administrator is provided with any information required to enable them to calculate the Pension Input Amount and to produce a Pension Savings Statement within statutory timescales. | By way of providing any additional information requested within 10 working days of receipt of the request from the administrator or Administering Authority. |

Table 16: Administration performance reports and CIPFA benchmarking

| Employer's responsibility | Timeframe |
|---|---|
| Provide additional information to assist in the completion of the annual CIPFA benchmarking questionnaire, if required by the administrator or the administering authority. | Within 10 working days of receipt of the request from the administrator or Administering Authority. |
| Provide additional information to assist in the accurate calculation and payment of all benefits, if required by the administrator. | Within 10 working days of receipt of the request from the administrator or Administering Authority. |

Table 17: i-Connect employee data portal

| Employer's responsibility | Timeframe |
|---|--|
| Ensure monthly i-Connect submissions are loaded and processed in accordance to submission dates | By the agreed submission date and no later than the 18th of the following month due. |
| Ensure all i-Connect submissions are reviewed before uploading and data is accurate. | By the agreed submission date and no later than the 18th of the following month due. |

| Employer's responsibility | Timeframe |
|--|--|
| Any changes to employer i-Connect users and changes of staff are communicated to the i-Connect administration team. | AS soon as possible but within 2 weeks of a change taking place. |
| Changes to payroll providers are communicated to the i-Connect team and the management of i-Connect data is handed over with support from the i-Connect Administration team. | Notification of any changes 90 days prior to changing payroll provider to allow the transition and file build to be managed. |
| To engage with i-Connect administration team to resolve any errors or suppression and omitted members or any other queries that arise from the monthly submission | Within 10 days of request from the i-Connect administration team. |
| Ensure participation on any training or updates provided by the i-Connect administration team. Any changes to the i-Connect specifications need to be implemented. | As requested by i-Connect administration team. |