Wiltshire Pension Fund

Employer training policy

Purpose

To fulfil the Administering Authority's (Wiltshire Council's) commitment to pension fund knowledge & understanding (K&U) for all scheme employers of the Fund, this training strategy has been developed to equip employer staff & sub-contracted staff with the skills they require to provide the Fund with all necessary information, as specified in the LGPS regulations & Pensions Administration Strategy document. In addition to enable employers to communicate with their employees on pension matters & be complaint with all current pension legislation & regulations.

Scope

The scope of the employer training policy seeks to;

1) **Define Scheme Employers** – As all scheme employers of the Wiltshire Pension Fund, namely;
    a) Any new employer on their entry to the Fund, either by statutory right, completion of an admission agreement, or by bulk transfer with Secretary of State approval from another LGPS;
    b) Any existing employer who is expected to pay contributions by the Fund in accordance with the Fund's schedule of contributions; &
    c) Any ceasing employer until their Section 75 debt has been fulfilled, the terms of which will for example, be specified by their admission agreement.
2) **Define the training requirement** – To ensure that all scheme employer staff & their agents have at least a requisite level of K&U to be able to fulfil the scheme employer's responsibilities in accordance with the LGPS regulations, the Pensions Administration Strategy document & general UK pension legislation, in addition to the completion of any other relevant training in connection with their responsibilities, for example data protection training.
3) **Define a Scheme Employer staff member** – As those individuals recorded on the Fund's Employer Relationship Management (ERM) database at the time of any designated training & who will typically hold a Pension Liaison Officer, HR, Payroll or Finance role within their own organisation.
4) **Defining an Agent** – Any third-party organisation sub-contracted by a scheme employer (typically a payroll provider) to fulfil a service specified in the Fund's Pensions Administration Strategy document.
5) **Define the training period to be covered** – The employer training cycle will cover each Fund year from 1st April to 31st March. A review of the employer training strategy will take place annually with a policy review to be completed at least every 3 years with the current policy commencing from 1st April 2020.

Objectives of the policy

1) To ensure that all relevant staff at each of the Fund's scheme employers possess the requisite K&U to enable them to fulfil the terms of the Fund's Pensions Administration Strategy document;
2) To provide any additional training that may be necessary to mitigate any detrimental impact on the operation of the Fund. Notable detrimental impacts specified within & in addition to the Fund's risk register are;

a) PEN002 – Collection of employer contributions
b) PEN008 – Compliance with LGPS regulations
c) PEN009 – Compliance with GDPR as joint data controllers
d) PEN010 – Provision of members data including joiner & leaver information
e) PEN015 – Collection of ceasing employer payments
f) PEN035 – Compliance with the Pension Administration strategy
g) PEN040 – Employee pension protections on transfer
h) PEN053 – Employer data retention requirements
i) The accurate maintenance of scheme employer contact details
3) To support good employer relationship management with the Fund's scheme employers;
4) To enable a cost-efficient service through education;
5) To establish a targeted communication, engagement, tracking & monitoring facility which will ensure the appropriate training continues to be provided, employer engagement is maintained & where required will be operated in conjunction with the Fund's escalation policy to address any service issues arising through the poor understanding of employers.

Strategy for the execution of the policy

The key steps enabling this policy to be executed are;

To identify whether an employer's (&/or their agents) training requirement have be met via a method of on-going feedback & an annual survey of their views & requirements by;

1) Summarising a schedule of training requirements drawn from the Pensions Administration Strategy document, employer feedback & Fund's business plan;
2) Outlining an annual training strategy based on the requirements identified & giving consideration to the following factors;
   a) The size of an employer's active membership & the status of that employer, i.e. new employers;
   b) The profile of an employer i.e. whether it's a scheduled, educational, town or parish council, or admitted body employer;
   c) The engagement, or specific needs of an employer such as an employer not achieving its requisite K&U threshold, or where an employer requires the Fund to provide bespoke training such as i-Connect on-boarding, or other ad-hoc topics; &

Note: The attainment of a requisite level of K&U threshold will be established using the following rating system;
   j) **Bronze:** The service provided by employer staff is creating a risk to the Fund & additional training is required;
   ii) **Silver:** Employer staff K&U is broadly speaking sufficient however targeted development may be appropriate; &
   iii) **Gold:** The threshold level of employer staff K&U has been reached &/or is being maintained.

The criteria by which an employer rating is established is set out in the "Employer monitoring & performance spreadsheet.

   d) An employer requiring special arrangement training, whereby for example it has requested training for its members following a bulk transfer of its members into the Fund.

3) Communicating the Fund's Employer training strategy via Newsletter & targeted mailshots using mailchimp;

4) On a monthly basis the Communications Manager will update employer contact details for all communications groups on Mailchimp in line with ERM & complete unsubscribing, engagement, training & escalations reviews of employer activity;

5) Allocating training actions to officers, external providers & Fund software platforms in line with the Fund's training strategy. With regard to platforms this will primarily involve the use of web-based training on the Fund's employer website; &

6) Assessing the feedback from employers on their training experience & needs, as well as statistical data on the engagement of employers to assist in the compiling of a schedule of training requirements.

Monitoring & Reporting

The fundamental basis by which employer K&U will be measured is through the monitoring & reporting of the quality of their data provision to the Fund along with the results of member surveys requesting their experience of their employer engagement. With no definitive statutory method by which to measure the K&U of employers a strategy of monitoring the output of employers will be implemented instead. As indicated each employer will then be assigned a Bronze, Silver or Gold rating based on the quality of their output.

In practice the monitoring & reporting of employers will cover the following areas;

1) **Communication** – Mailchimp will be used to monitor the levels of engagement through the reading of the Fund's training communications & the numbers of employer staff unsubscribing from the Fund's communications;

2) **Employer website** – Will be used to collate the registration of training, its completion & other measures such as page views (see 5a);

3) **Altair** – A Datachase workflow function will be maintained by the Benefits team whereby a workflow item will be created on the receipt of any substandard, or late submitted of information from an employer.

4) **Contribution submission** – The Accounting team will prepare a report of submitted contribution payments to the Fund's bank account on a weekly basis for i-Connect purposes & monthly for regulatory purposes, to ensure that monies are being received in both a timely & accurate matter & consistent with the data received.

5) **Post training feedback** – On completion of training by employer staff they will be asked to provide their feedback to the Fund. This will be requested in two basic forms;
   a) By on-line survey following the completion of web-based training; &
   b) By questionnaire where the training has been conducted on a face-to-face basis.

Feedback b) will be collected by the Employer Relationship Manager.

6) **Surveys** – The Employer Relationship Manager will co-ordinate periodic, but no less than annually a survey(s) to all employers requesting information on their training requirements.

7) **Budgeting** – A record of the costs associated with employer training should be maintained & be likely to include venue hire, catering, external consultancy fees & the development of training materials. Notional funding will be assessed by using the employers 1% administration charge included within the schedule of contributions as a means of measuring the on-going cost effectiveness of the training provided.

The Communication's Manager will co-ordinate the feedback from all the sources stated above & ensure that all the performance indicators set out within the Fund's Pensions Administration strategy & Communications strategy have been captured. The co-ordination of this information will be completed with the support of the Employer Relationship Manager, Systems & Data Manager, Accounts Manager & the Data Work Management Officer.

On compiling the information, the Communication's Manager will prepare & distribute the following report;

1) **Monthly Report** – A report detailing the prevailing ratings score of all employers in the monitoring areas of 1 to 5 above which will be added to the Management Dashboard.

In addition, the Employer Relationship Manager will prepare & distribute the following report;

2) **Annual Report** – A report on all employers including their prevailing rating at the end of each scheme year, a summary of their training completed during that year, the cost of that training & an outline of the training strategy for the next Scheme year, along with a proposed budget for submission to the distribution list below.

Reports will be distributed to the following Fund officers;

- Head of Pension Administration & Relations;
- Head of Pension Fund Investments;
- Communications Manager;
- Employer Relationship Manager;
- Benefits Manager;
- Pension Benefits Work Management Officer;
- Technical & Compliance Manager;
- System & Data Manager;
- Data Work Management Officer; &
- Fund Governance & Performance Manager;

Oversight & review

This policy will be overseen and reviewed by considering;

1) The need for the Employer training strategy to be reviewed every 3 years;
2) The requirement to conduct annual reviews at the end of each Scheme Year by key Pension Fund Officers;
3) The understanding that on behalf of the s151 Officer the Head of Pension Administration & Relations will take day-to-day responsibility for the development & maintenance of the employer training strategy & that where appropriate it will be the responsibility of the Employer Relationship Manager & the Communication's Manager supported by the Head of Pension Administration & Relations to ensure that where an employer is not achieving the requisite standard of knowledge & understanding by virtue of their output rating they will follow the Fund's escalation policy to address that employer's risk to the service; &
4) In conjunction with the Fund's Member & Office training strategies an annual summary of employer training should be presented to the Fund's Local Pension Board for its review.

Documents

1) Monthly Report;

2) Annual Report;
3) Employer monitoring & performance spreadsheet;
4) Accounts team Report; &
5) ERM tool & face to face questionnaires.

References

1) LGPS Regulations, Pensions legislation & the Data Protection Act 2018;
2) Relevant finance, payroll & HR legislation where an impact on the Pension Fund is recognised.

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