

## Appendix 3: Employer escalation policy

### 1. Introduction

The purpose of this policy is to outline the Fund's approach to resolving any data, processing and payment issues with employers.

The Fund wishes to work closely in partnership with all its participating employers to enable it to efficiently and effectively administer their employees and former employees' pensions. The Fund also works in a highly legislated, complex environment which means that its data requirements are not always straightforward, yet it is required to process data within certain timeframes to remain compliant with legislation and also to provide high quality customer service to members. The Fund also considers onboarding on to i-Connect to be a mandatory employer requirement and therefore, a failure of an employer to onboard onto i-Connect will also be considered under this policy

The aspiration of the Fund is always to focus on preventative approaches with employers, such as training and support, to limit the occasions when an escalation of issues is necessary. As part of the Fund's 2022 business plan, the Fund is committed to providing improved employer training materials and periodic performance reporting to employers.

### 2. Scope of this policy

The policy covers the Fund's approach to all data and payment issues outlined within the Pension Administration Strategy.

### 3. Approach

The Fund will monitor employers' performance against the targets set out within the Pension Administration Strategy and will use the approach outlined in section 4 where the timeframes are breached.

In all cases, the Fund wishes to work closely and support the employer to resolve the issues identified.

**The approaches outlined in section 4 are a guide to the approach the Fund will use, and the Fund reserves the right to take an alternative approach where it is necessary and proportionate to do so.**

#### 4. Escalation approaches by process

##### a). i-Connect administration submissions (if relevant) and payment of contributions – indicative process

	Issue identified	
	Return or contributions not received by the deadline	Materially incorrect or a poor-quality return is received
<p><b>i). Monthly i-Connect upload</b></p> <p><b>ii). Rectifying queries identified by i-Connect.</b></p> <p><b>iii). Payment of employer and employee contributions (Starts at step 2).</b></p>	<p><b>Step 1: <u>7 days prior to deadline (i-Connect only)</u></b> A reminder email will be sent by the i-Connect system to the appropriate i-Connect employer contact, as identified by the employer.</p> <p><b>Step 2: <u>3 Working days after deadline</u></b> If an i-Connect file has still not been processed, then a late reminder email will be sent by the i-Connect system. For late contribution payments, the Fund’s accounts team will contact the designated contact.</p> <p><b>Step 3: <u>7 Working days after deadline</u></b> If no response is received, the Employer Services/Accounts team will make further contact with the employer and escalate the matter to more senior roles within the employer’s structure.</p> <p><b>Step 4: <u>If step 3 does not promptly resolve the matter</u></b> If issues remain, the Fund will consider and apply further steps such as:</p> <ul style="list-style-type: none"> <li>• Escalation to more senior roles within the employer and/or the Fund; and/or</li> <li>• The implementation of an administration surcharge;</li> <li>• Write to Scheme members (employees to make them aware of the issues) and/or</li> <li>• Reporting the matter to the Pension Regulator.</li> </ul>	<p>1.) The Fund’s Employer Services team will highlight any errors or suppressions that have not been resolved prior to processing. They will send an email to the appropriate employer contact, as identified by the employer within 10 working days of submission. Issues must be resolved by the employer prior to the next monthly submission.</p> <p>2.) If issues are not resolved by the employer prior to the next monthly submission the matter will be referred to the Employer Relationship Manager who will phone and/or email the employer contacts, escalating to more senior roles within the employer’s and Fund’s structure as necessary.</p> <p>3). If errors persist, the Fund will consider and apply further steps such as:</p> <ul style="list-style-type: none"> <li>• Escalation to more senior roles within the employer and/or the Fund; and/or</li> <li>• The implementation of an administration surcharge;</li> <li>• Write to Scheme members (employees to make them aware of the issues) and/or</li> <li>• Reporting the matter to the Pension Regulator.</li> </ul>

## Repeated issues:

In addition to the escalation approach above, if after resolving the issues relating to a particular month, similar issues occur again on more than one occasion, the Fund reserves the right to move towards the final steps on the escalation process labelled above.

## b). Individual benefit administration cases and other ad-hoc requests – indicative process

**Note:** For particularly urgent cases, the timeframes outlined below may be condensed.

Issue identified	
Information not received by the deadline or in the stated timeframe	Materially incorrect or poor-quality information is received
<p><b>Step 1:</b> <u>Deadline missed</u> A member of the Employer or Member Services team will send a reminder email and, if appropriate, a phone call.</p> <p><b>Step 2:</b> <u>5 working days after the reminder in step 1</u> If no response is received, a further email will be sent to the same email address and also to the employer's main pension contact. A phone call may also be made.</p> <p><b>Step 3:</b> <u>10 working days later</u> If no response is received, the matter will be referred to the Employer/Member Services Manager or Employer/Member Services Work Management Officer who will phone and email the employer contacts, escalating to more senior roles within the employer's structure.</p> <p><b>Step 4:</b> <u>If step 3 does not resolve the matter</u> If issues remain, the Fund will consider and apply further steps such as:</p> <ul style="list-style-type: none"><li>• Escalation to more senior roles within the employer and/or the Fund; and/or</li><li>• The implementation of an administration surcharge;</li><li>• Write to Scheme members (employees to make them aware of the issues) and/or</li><li>• Reporting the matter to the Pension Regulator.</li></ul>	<p>1). A member of staff will summarise the area of concern and email the appropriate employer contact with these, offer further explanation and support and set out a timeframe for re-submission.</p> <p>2). If problems persist, the team will offer further support and assistance, including if appropriate and practical, a face to face visit.</p> <p>3). If the employer does not engage with the support offered or fails to respond, steps 2 onwards from the adjacent column will apply.</p>

### **Repeated issues:**

In addition to the escalation approach above, if after resolving the issues relating to a particular month, similar issues occur again on more than one occasion, the Fund reserves the right to move towards the final steps on the escalation process labelled above.

### **d). General data and employer engagement issues**

Where general data or employer engagement issues arise, normally as highlighted by the Fund analysis of an employer's data submission against the timeframes within this document, the Employer Relationship Manager, or a suitable colleague, will initially offer support and training and seek the engagement of a senior member of the employer concerned. If the approached outlined is unsuccessful, the matter will be raised internally with the Fund and the Fund will take an approach which is proportionate with the issue faced which could be further support or the levy of additional administration charges, as outlined in section 5 below, and reporting to the Pension Regulator.

### **5). Administrative charges**

In conjunction with the Fund's charging policy, where the Fund considers that it has incurred additional costs (including officer's time) as a result of an employer's poor level of administrative performance, Regulation 22 of the Local Government Pension Scheme Regulations 2013 allows the Fund to recover these costs.

The Fund very much considers this approach a last resort which it will only use if it feels it has exhausted all other reasonable means of improving the employer's performance.

Where such a situation arises, the Fund will apply a charge based on a double of the hourly rate of staff involved multiplied by the estimated number of hours involved. The Fund will raise an invoice for such a charge and provide a breakdown of the charge and send it to the employer accordingly.

Note i: Where orders or instructions issued by The Pensions Regulator, the Pensions Ombudsman or other regulatory body require financial compensation or a fine to be paid by Wiltshire Pension Fund, or by any officer responsible for it, and it is due to the default, omission or otherwise negligent act of the employer, the sum concerned will be recharged to the employer.

Note ii: In addition, where the Fund incurs costs related to the stage 1 review of the Internal Dispute Resolution Procedure (IDRP) which are due to an employer's action or lack of action, these costs will be charged to the employer. Similarly, the employer will pay for all costs where the IDRP is aimed solely at the employer and the costs will be apportioned between employer and Fund where the IDRP is targeted at both the Fund and employer.