



Pensions Administration Strategy

Royal County of Berkshire Pension Fund

December 2025

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1. Introduction

This is the Pensions Administration Strategy Statement (the 'Strategy') for the Royal County of Berkshire Pension Fund (the 'Fund'). The Royal Borough of Windsor and Maidenhead (RBWM) is the Administering Authority for the Fund, as defined in the Local government Pension Scheme (LGPS) regulations.

This Strategy sets out the requirements for Scheme employers which will enable them and the Fund to meet their legal obligations in respect of the LGPS Regulations and regulatory standards required by the Pensions Regulator (TPR).

2. Compliance

This strategy seeks to promote good working relationships, improve efficiency and ensure agreed standards of quality in delivery of the pensions administration service amongst the employers and the Fund.

In no circumstances does this Strategy override any provision or requirements of the LGPS regulations.

3. Review

The Fund will review this Strategy every three years or sooner subject to regulatory change and make revisions as appropriate following a material change in policy in relation to any matters contained in the Strategy.

Where there are significant revisions made to the Strategy and/or the changes will have implications to Scheme employers, the Fund will consult more widely with Scheme employers and other persons it considers appropriate. The Pensions Committee must approve the Strategy before it is published (except where there are minor or corrective amendments only).

A copy of this Strategy will be published on the Fund's website and a link circulated to Scheme employers in the regular Scheme employer newsletters.

4. Legislation

The Local Government Pension Scheme Regulations require the Fund to prepare a written statement of its policies in relation to the following:

- Procedures for liaison and communication with participating Scheme employers;
- The establishment of levels of performance which the Fund and its participating Scheme employers are expected to achieve in carrying out their Scheme functions;
- Procedures which aim to ensure that the Fund and its participating Scheme employers comply with statutory requirements in respect of those functions and with any agreement about levels of performance;

- Procedures for improving communication of information relating to those functions by the Fund and its participating Scheme employers;
- The circumstances in which the Fund may consider giving notice to any of its participating Scheme employers because of that Scheme employer's unsatisfactory performance in carrying out its Scheme functions; and
- Such other matters that appear to the Fund to be suitable for inclusion in the Strategy.

5. Aims and Objectives

The aim of this Strategy is to detail requirements for liaison and communication between Scheme employers and the Fund thus ensuring regulatory compliance is achieved and best value service standards are delivered to Scheme members and other parties to meet their statutory obligations.

This is achieved by:

- Clearly defining the respective roles of the Fund and Scheme employers as set out in the LGPS Regulations and other relevant legislation;
- Setting clear service standards and service levels to be delivered by respective parties, to enable efficient administration of functions;
- Clarifying procedures for effective communications and information exchange between Scheme employers and the Fund;
- Establishing a basis for monitoring service delivery and identifying opportunities for improvement and added value; and
- Providing a framework for monitoring compliance with regulatory requirements and where necessary, for formal reporting of breaches of the law, in accordance with the Pensions Regulator's General Code of Practice ("the Code").

6. Monitoring Service Standards and Compliance

The Pensions Team will monitor the performance of Scheme employers against the targets and standards set out in this Strategy and will share monitoring outcomes and any issues arising with:

- The Pensions Committee;
- The Local Pensions Board;
- Individual Scheme employers; and
- The Pensions Regulator (where appropriate).

The Fund will monitor performance in the following ways:

- By recording monthly contributions received from each Scheme employer
- Through monthly 'Service Standards' reporting (shared in the Fund's Annual Report and Accounts);
- By sharing a Business Plan with the Pensions Committee, highlighting performance levels;
- By regularly reviewing internal processes and controls;
- By reviewing the Breaches Log each quarter; and

Where performance issues arise, the aim in the first instance will be to resolve issues informally between parties, and to identify appropriate action to address any underlying issues, through training, coaching, process improvements or better communications.

7. Breaches

Please note, where there is a clear breach of LGPS Regulations or agreed performance, for instance, where a Scheme employer fails to pay the monthly contribution income to the Fund in line with regulatory guidelines or where the Fund fails to issue the statutory communications (such as the Annual Benefit Statements) to members within statutory deadlines, the Fund is duty bound to capture this on its Breaches Log. All such breaches will be investigated and if deemed material will be reported to the Pensions Regulator.

8. Scheme Employer Designated Pensions Contacts

To ensure that joint working is effective, it is important for Scheme employers to keep the Fund updated with any changes to staff responsible for sending and signing off pensions data and telling us who we can contact with queries (authorised contacts).

Key Scheme employer contacts include:

- Director of Human Resources
- Payroll Manager

In addition, Scheme employers are expected to nominate authorised officers for day-to-day pensions matters, known as a Pension Liaison Officer (PLO), including appropriate contacts if using an external payroll provider.

Key Scheme employer responsibilities will be:

- To ensure that the standards and level of service set out in the Pensions Administration Strategy are delivered and regulatory responsibility is complied with;
- To act as a conduit for communications to appropriate staff within the Scheme employer, for example Human Resources, Payroll Departments, Director of Finance;
- To inform the Fund of any outsourcing, TUPE transfers or alternative service delivery arrangements that may be under consideration;

- Day-to-day administration such as new starters, leavers, amendments and other pension enquires; and
- To liaise with and assist the Fund in the identification explanation, reporting and resolution of statutory breaches, as required by the Pensions Regulator's General Code of Practice.

9. Scheme Employer Responsibilities

This section outlines the role and responsibilities of all employers in the Fund and the performance standards employers are expected to meet, to enable the Fund to deliver an efficient, quality and value for money service. The Scheme employer role is divided into two key areas:

- Scheme Governance and Administration
- Scheme Membership and Scheme Employer Administration

9A. Scheme Governance and Administration

Scheme Employer Responsibility	Action Required by Scheme Employer	Timescale for Scheme Employer to Act. Service Level Agreement
Pensions Discretions	Formulate and publish policies in relation to all areas where the Scheme employer may exercise a discretion within the LGPS (including providing a copy of the Discretionary Policy Statement to the Fund).	To be kept under regular review and a revised Discretionary Policy Statement published within one month of any changes and no later than 6 months after being informed by the Fund of any relevant changes.
Scheme member and Scheme employer Pension Contributions	Remit Scheme employer and Scheme member contributions to the Fund and provide schedule of payments in the format stipulated by the Fund.	Cleared funds to be received by 19th calendar day of the month after deduction. Payment of any AVC contributions to be received directly by the Fund's AVC provider (Prudential) also by the 19th calendar day of the month after deduction.
Scheme employer Contribution Rate	Implement changes to Scheme employer contribution rate as instructed by the Fund.	At date specified on the actuarial advice received by the Fund.
Year-end Information	Provide accurate year-end information required by the Fund in the format stipulated	By no later than the 30th April following the year-end or earlier date specified by

	in the instructions issued by the Fund.	the Fund e.g. earlier submission in a valuation year.
Contracting services	Notify the Fund of contracting out services which will involve a TUPE transfer of staff to another organisation.	At the time of deciding to tender so that pension costs can be included in the tender decision-making process.
Admission Agreement	Work with the Fund to arrange for an Admission Agreement to be put in place when contracting out a service and assist in ensuring it is complied with.	Admission Agreement to be put in place no later than two weeks after the date the contract commenced.
Admission agreement (potential cessation)	Notify the Fund as soon as you are aware of a cessation event (i.e. last active Scheme member leaving, termination of contract).	As soon as the decision is made, so that the Fund can assess the impact and instruct the Actuary to carry out cessation calculations, if applicable.
Retirement costs (strain)	Make additional Fund payments in relation to early payment of benefits from flexible retirement, redundancy or business efficiency retirement or where a Scheme member retires early with Scheme employers' consent.	Within 21 calendar days of receipt of invoice from the Fund.
Additional Costs / Sanctions	Pay any fines / costs incurred because of non-performance / non-compliance with this Pensions Administration Strategy or those charged by the Pensions Regulator, as a result of a direct breach of the LGPS Regulations.	Within 28 calendar days of receipt of invoice from the Fund.
Payment of Invoices	Prompt payment of invoices issued by the Fund for specific services provided.	Within 28 calendar days of the invoice date
Breaches	Respond to enquiries from the Fund relating to a material Breach of the Law.	Within 5 working days of the request.
Internal Dispute Resolution Procedure (IDRP)	Appoint person as adjudicator for Stage 1 appeals made under the IDRP process.	Within 28 calendar days of becoming a Scheme employer or following the resignation of the current adjudicator.
Pension Dashboards	Respond to queries raised by the Fund relating to the requirements of the Pension Dashboards.	Within 5 working days of being contacted by the Fund.

9B. Scheme Membership and Scheme Employer Administration

The Fund's preferred method for the submission of data is through our data portal known as i-Connect. Scheme employers simply submit a monthly employee payroll data file and i-Connect processes the file and identifies the data to be uploaded to the pension administration scheme – Altair. This makes the administration of the Scheme less complicated for both the Scheme employer and the Fund.

The Fund mandates that any new Scheme employer must start using the i-Connect system from the point of admission.

Scheme Employer Responsibility	Action Required by Scheme Employer	Timescale for Employer to Act. Service Level Agreement
New starter	Notify the Fund of new starters to the LGPS.	By the 16th calendar day of the following month which the Scheme member joined.
Scheme member Contributions	Arrange for the correct deduction of contributions from a Scheme member's pensionable pay.	Immediately on joining the Scheme, opting in or a change in circumstances.
Scheme member Contribution Rate	Ensure the correct Scheme member contribution rate is applied.	Immediately on commencing Scheme membership and in line with the Scheme employers' discretionary policy on banding changes and, as a minimum, in each April payroll thereafter.
Change of Personal Circumstances	Notify the Fund of any material changes in Scheme members' circumstances (e.g. payroll/contract change, address change, marital or civil partnership status).	By the 16th calendar day of the following month which the material change occurred.
Scheme member reaching age 75	Ensure no further pension contributions are deducted from any Scheme members pay two days before reaching their 75th birthday.	Inform the Fund during the month prior to the month that the Scheme member reaches their 75th birthday.
Scheme members Leave of Absence	Notify Scheme member of options regarding any unpaid authorised absence (Additional Pensions Contributions (APC) to cover breaks). Inform the Fund of the members	Monthly submissions / notifications should be reported to the Fund by 16th calendar day of the following month.

	<p>Assumed Pension Pay (APP) for relevant periods of absence.</p> <p>Notify the Fund of leaves of absence (industrial dispute, child related leave, authorised absence and unauthorised absence).</p>	
Additional pension contributions (APCs)	<p>Election from Scheme member to buy extra pension:</p> <p>Commence or cease deduction of APC, or amend such deductions, as appropriate.</p>	Month following election to pay additional pension contributions.
Shared Cost Additional Pension Contributions (SCAPCs)	<p>Election from Scheme member to buy back lost pension if away from work with no pay.</p> <p>If Scheme member elects within 30 days of returning to work, Scheme employer will meet two thirds of the cost (except for industrial action – strike).</p> <p>Commence / Cease deduction of APC; or amend such deductions, as appropriate.</p> <p>Pay across Scheme employer share to Fund.</p>	Month following election to pay additional pension contributions.
Additional Voluntary Contributions (AVCs) including shared cost arrangements	<p>Arrange for deduction of AVCs and payment over of contributions to AVC provider(s).</p>	<p>Commence deduction of AVCs in the month following the month of election.</p> <p>Pay over contributions to the AVC provider (Prudential) by the 19th calendar day of the month following the deduction.</p> <p>Upload the relevant schedule to AVC provider (Prudential).</p>
Scheme member Leaves Employment (voluntary resignation under their	Notify the Fund when the Scheme member leaves employment using the	By the 16th calendar day of the following month, after the date of leaving.

individual normal pension age)	method stipulated by the Fund.	
Final Pay calculation	For Scheme members with pre-1 April 2014 membership (final salary arrangement), to provide average FTE pensionable pay for last 365 days of employment.	Within 10 working days of data being requested by the Fund.
Scheme member due to Retire	Notify the Fund when a Scheme member is due to retire including an accurate assessment of pay and confirmation of reason for leaving using the method stipulated by the Fund.	As soon as practicable, but no later than 16th calendar day of the month following the Scheme members' retirement date. Do not wait to inform the Pension Team via i-connect please use the Funds early notification form. Please only provide figures, however if you know that they will not change.
III-health	The Scheme employer to determine eligibility and notify the Fund of III-Health award and the Tier granted. To submit completed Medical Certificate from approved independent registered medical practitioner (IRMP).	Within 10 working days of decision being made.
Tier 3 Review	Scheme employer to review Tier 3 III- Health pension at 18 months and, if required at the 3rd year after payment commenced.	In line with regulations and advice of Independent Registered Medical Practitioner (IRMP). Notify the Fund within 10 working days of decision taken.
III-Health Deferred Pensioner (former Scheme member)	The Scheme employer to notify the Fund of III-Health award.	Within 10 working days of decision being made.
Death of a Scheme member (Death in Service)	Notify the Fund of the death of a Scheme member including an accurate assessment of pensionable pay.	As soon as practicable, but within 10 working days of being notified of the death.
Scheme member Enquiries	Respond to enquiries from the Fund.	Within 10 working days from receipt of enquiry.

A document linked to our Pensions Administration Strategy is the Funding Strategy Statement (FSS).

The primary objectives of the FSS are to:

- **Establish a transparent funding plan:** Outline a clear, fund-specific strategy for meeting pension liabilities.
- **Ensure solvency and long-term efficiency:** Set contribution rates at a level to ensure the fund can meet all benefit payments as they fall due over the long term.
- **Stabilize scheme employer contributions:** Aim to keep Scheme employer contribution rates as constant and affordable as possible, balancing this with the need for prudence and long-term solvency.
- **Manage risk:** Document the approach to managing various financial and demographic risks, including employer default, investment performance, and changes in liabilities.
- **Comply with regulations:** Meet the statutory requirements of the LGPS Regulations and have regard to guidance from the Ministry of Housing, Communities & Local Government (MHCLG) and CIPFA.

The Fund works with the Scheme employers to achieve these objectives and many of them have been listed in this specific section of the Strategy, including the deduction and payment of contributions, tell the Fund promptly about any changes to circumstances, prospects or membership which could affect future funding and making any required exit payments when leaving the Fund.

10. Pension Fund Responsibilities

This section outlines the key responsibilities of the Fund, and the performance standards Scheme employers and Scheme members should expect. It is focused on the key activities which involve interaction with Scheme employers and /or Scheme members and should not be viewed as an exhaustive list.

10A. Scheme Governance

Fund Responsibility	Action Required by the Fund	Timescale for the Fund to Act Service Level Agreement
Forms	Publish and keep up to date all forms required for completion by Scheme members, prospective Scheme members or Scheme employers.	Within 30 working days of any revision.
Scheme Rules	Notify Scheme employers and Scheme members of	Within three months of the changes coming into effect.

	material changes to the Scheme rules.	
Scheme employer / Fund Meetings	Host an annual general meeting (AGM) which all Scheme employers are invited to attend. Plus, ad hoc Scheme employers' meetings as required.	Once per year (or as required).
Scheme employer Training	Provide rolling programme of refresher or 'hot topic' training for Scheme employers.	At least once per year.
Scheme employer Newsletter	Provision of a newsletter / briefing note to Scheme employers.	Quarterly or more frequent if there is additional pensions news to report.
Performance Monitoring	Notify a Scheme employer of material issues relating to the any non-compliance with performance standards.	Within 28 working days of a performance issue becoming apparent.
Costs	Notify a Scheme employer of decisions to recover additional costs associated with any poor performance (including any interest that may be due).	Within 28 calendar days of Scheme employer's failure to improve performance, as agreed.
Annual Benefit Statements (ABS)	Issue ABS online via 'Member Self-Service' Portal to active and deferred Scheme members.	By 31st August following the Scheme year-end.
Annual Allowance Pension Saving Statements (AAPSS)	Issue AAPSS to Scheme member identified as being in excess of the Annual Allowance.	By 6th October following the Scheme year-end.
Triennial Valuation Results	Issue formal valuation results (including individual Scheme employer details).	No later than the 1 March following the valuation date.
Cessation Valuations	Carry out valuation assessment on cessation of admission agreements or Scheme employer ceasing participation in the Fund.	Within 12 months of agreed timescales.
New Scheme employer Admissions	Process admissions into the Fund including signed Admission Agreement (where required). Notification of contribution rate, allocation of assets and notification to the Secretary of State.	Within two weeks of date joining the Fund, provided prospective Scheme employer provides full data requirements within prescribed timescales.
Governance Compliance Statement	Publish and keep under review, the Fund's Governance Compliance Statement.	This will be reviewed annually by the 1st July or within 30 calendar days of the policy being agreed /

		amended by the Pensions Committee.
Funding Strategy Statement (FSS)	Publish and keep under review, the Fund's FSS.	To be reviewed at each triennial valuation (or whenever there is a material change to the FSS policy or the Statement of Investment Principles) following consultation with Scheme employers and the Fund's Actuary. Revised statement to be published by 31st March following the valuation date.
Annual Report and Accounts	Publish the Fund's Annual Report and Accounts.	By 1st December following the financial year-end.
Communications Strategy Statement	Publish and keep under review, the Fund's Communication Strategy.	We continually review the ways in which we communicate with our stakeholders and this <u>Communication Strategy</u> will be revised following any material change.
Administering Authority Pension Discretions	Formulate and publish policies in relation to areas where the Fund may exercise a discretion within the LGPS regulations and keep under review.	To be reviewed every four years, or sooner if material legislative change.

The following table details the Fund's functions which specifically relate to the administration and processing of Scheme member benefits from the LGPS.

The Fund's objective against which it will benchmark itself is to deliver 95% (or better) of its services within the published service standards timeframe. Any reference to a day is a working day.

10B. Scheme Administration

Fund Responsibility	Action Required by the Fund	Timescale for Fund to Act Service Level Agreement
New Starter	Set up a new starter and provide statutory notification to the Scheme member.	Within 20 working days from receipt of correctly completed starter form or monthly interface from Scheme employer.
Transfer In (inc. Inter-funds)	Communication issued to Scheme member with completion of transfer in.	Within 15 working days from receipt of all necessary information.

Transfer Out (inc. Inter-funds)	Communication issued to Scheme member with completion of transfer out.	Within 15 working days of receipt of all necessary information.
Merging of benefits (inc. Concurrency)	Communication issued to Scheme member.	Within 15 working days of receipt of all necessary information.
Divorce Quotes	Estimates for divorce quotes.	Within 15 working days of receipt of all necessary information.
Divorce Pension Sharing Order	Provision of information to Scheme member following implementation of Pension Sharing Order.	Within 15 working days of receipt of all necessary information.
Pensions Estimates	Provide requested estimates of benefits to Scheme members/Scheme employers including any additional retirement cost in relation to early payment of benefits from ill health, flexible retirement, redundancy or business efficiency retirement.	Within 10 working days of receipt of all necessary information. Please note: bulk estimate requests of more than 10 Scheme members at one time will be subject to prior agreement between the Fund and the Scheme employer.
Retirement Option Letters	Issue of retirement letters detailing Scheme member options.	Within 10 working days of receipt of all necessary information.
Retirement Benefit Payments	Process of retirement benefits for payment following receipt of election.	Within 10 working days of receipt of all necessary documentation. First pension payment on next available run.
Deferred Benefit Calculations	Deferred benefits calculated.	Within 20 working days of receipt of all necessary information.
Refund Payments	Process refund payments.	Within 10 working days of receipt of all necessary information.
Death Notifications	Notification of death of active, deferred, pensioner and dependent member acknowledged.	Within 10 working days of receipt of all information.
Death Grant Payments	Process of death grant lump sum for payment.	Within 10 working days of receipt of all information.
Dependents' Pensions	Process of dependents' pension for payment.	Within 10 working days of receipt of all information.
Pensioner Payslip/ P60s	Provide pensioner payslip to Scheme members in receipt of a pension.	Electronic copies of monthly payslips are available to view online, following running of monthly payroll. With paper copy on request.

Internal Dispute Resolution Procedure (IDRP)	Process all Stage 1 (where applicable) and Stage 2 IDRP applications.	Within two months of receipt of the application or such longer time as is required to process the application where further information or clarification is required.
Scheme Enquiry	Provide an answer or acknowledgement to Scheme member / Scheme employer / personal representative / dependants and other authorised persons.	Within 10 working days of enquiry or within TPR requirements for Dashboard queries.

11. Recovering Costs / Sanctions / Penalties

Where persistent and on-going failure occurs, and no improvement is demonstrated by a Scheme employer (and or unwillingness is shown to resolve the issues identified) the Fund may under regulation 70 (1) of the LGPS regulations 2014, recover costs from an employer, where costs have been incurred because of that Scheme employer's level of performance in carrying out its functions under these Regulations.

Any costs, sanctions or fines imposed by the Fund will be recovered from the Scheme employer and not the third-party company appointed by the Scheme employer to provide pensions services e.g. a third-party payroll provider.

Circumstances where additional costs may be recovered from an employer

These are:

- persistent failure to provide relevant information to the Fund, Scheme member, or any other interested party in accordance with specified performance targets (either relating to the timeliness of delivery or the quality of information);
- instances where performance by the Scheme employer results in a loss to the Pension Fund, e.g. any overpayment resulting from inaccurate information supplied by the Scheme employer, costs associated with the assessment of benefits, interest on late payment of benefits, scheme tax charges, etc.;
- failure to deduct and pay over correct Scheme employee and Scheme employer contributions within the standard timescales;
- failure to pay any other amounts due to the Pension Fund, e.g., actuarial strain payments;
- instances where the performance of the Scheme employer results in fines being levied against the Fund by the Courts, the Pensions Regulator, the Pensions Ombudsman or any other regulatory body.

Approach to seeking additional administration costs as a result of failure to meet performance targets or financial failure

The approach taken by the Fund in the case of circumstances outlined previously will be to consider seeking additional administration costs where persistent failure occurs and no improvement is demonstrated by a Scheme employer once all the opportunities to resolve any issues identified have been exhausted. In these circumstances the Fund would:

- write to the Scheme employer, setting out the area(s) of poor performance;
- meet with the Scheme employer to discuss area(s) of poor performance and how these can be addressed;
- issue formal written notice, where no improvement is demonstrated by the Scheme employer, setting out the areas of poor performance that have been identified, the steps taken to resolve the area(s) of poor performance, and that the additional costs will now be reclaimed;
- clearly set out the calculations of any loss resulting to the Fund, or additional costs, considering the time spent and resources used in resolving the specific area of poor performance.

Penalties for failure by employers to meet their statutory obligation

Administration fees shown on the following page, will be charged at the discretion of the Head of the Pension Fund and will only be invoked if a Scheme employer has **consistently failed** to meet its obligations, and an **Improvement Notice** has been issued and not complied with. The Fund will apply the escalation process set out in Appendix 1 before determining what course of action is to be taken.

Regulatory Task	Administration Fee / Charge
Late payment of employer and/or scheme member contributions. Plus, any statutory charges.	£150 per occurrence plus interest as defined in the LGPS Regulations.
Late provision of year end contributions returns in prescribed format*.	£1,000 per occurrence plus £100 for each week plus part week of continued non-provision.
Late provision of starter information, per case.	£50 initial charge plus £50 per month or part month of continued non-provision.
Late provision of leaver information, per case.	£50 initial charge plus £50 per month or part month of continued non-provision.
Charges for persistent incorrect and incomplete information provided by the Scheme employer to the Fund (where the case has to be returned for incorrect information on more than 2 occasions).	£50 per case.
Fine from the Pensions Regulator**.	Amount requested by the Pensions Regulator.
Fine from the Pensions Ombudsman**.	Amount requested by the Pensions Ombudsman.
Delay causing unauthorised payments**.	Cost of tax from the HMRC and or reimbursement of charges imposed by HMRC on the Berkshire Pension Fund.

Fines from any other Statutory Body incurred as a result of the employer's actions.	As levied.
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Notes

* Due to the serious impact of this requirement, a penalty charge will apply for late submission and will only be waived in exceptional circumstances, as agreed by the Head of Pension Fund.

** Fines or charges imposed by the Pensions Ombudsman, Pension Regulator and HMRC for non-compliance will be recharged in full to the Scheme employer.

Apart from the requirement above, these fees and charges will only be made in exceptional circumstances. Berkshire Pension Fund will do everything possible to support employers to avoid them.

Appendix 1 – Escalation Process

1. Late payment of monthly pension contributions

Scheme employee and Scheme employer contributions must be paid to the Fund within 19 calendar days beginning on the day after the deduction is made.

Working Days Payment Due Late	Action
0-5 working days	Email to be sent to the Scheme employer to alert them to the payment failure and to seek to resolve the overdue payment.
5-10 working days	Further email to be sent to the Scheme employer to find out the cause and circumstances of the payment failure.
10-15 working days	Telephone call and/or email to confirm Scheme employer is in breach and will be included on the Berkshire Pension Fund's Breaches Log.
15+ working days	Referred to the Deputy Head of the Pension Fund to agree next steps, including whether financial penalties to be imposed.

2. Failure to send the monthly i-Connect data submission by the due date

Working Days Late	Action
0-5 working days	Reminder email to be sent to the Scheme employer to alert them to that submission is overdue.
5-10 working days	Further email to be sent to the Scheme employer to find out the cause and circumstances of the overdue submission.
10-15 working days	Telephone call and/or email to confirm Scheme employer is in breach and will be included on the Berkshire Pension Fund's Breaches Log.
15+ working days	Referred to the Deputy Head of the Pension Fund to agree next steps, including whether financial penalties to be imposed.

3. Failure to submit all other documentation or respond to queries by the expected date

Working Days Late	Action
0-5 working days	Email reminder to be sent to the Scheme employer.
5-10 working days	Further email to be sent to the Scheme employer to agree deadline for final response to be received.
10-15 working days	Scheme employer to be contacted again with escalation to a senior contact. To record on the Berkshire Pension Fund's Breaches Log.

15+ working days	Referred to the Administration Manager of the Pension Fund to agree next steps, including whether financial penalties to be imposed.
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