

No	Employer	Page	Responsibility / Section	Question	GMPF Response	Draft PAS amended?
1	Scheme employer 1	11	Provide scheme member pay and contribution data to GMPF	<p>Section 3.2 Contributions and Payments</p> <p>On speaking with our payroll provider there is an issue with providing the monthly i-Connect file on the first working day of the month, and I believe they have already raised this with GMPF. Due to payroll processes already in place, it would not be possible to upload the file on the first working day of the month, and the earliest that our payroll provider are able to send through the i-Connect file is on the fourth working day of the month. We have a similar target date set for the monthly interface to the third party pension administrator. I notice from section 6 of the PAS, that any late upload of the monthly i-Connect file is subject to a penalty of £500 plus a fixed penalty of £50 for each day after the set deadline until the i-Connect file is sent.</p> <p>Due to the payroll processes already in place, this will result in HMPPS being liable for a penalty of £700 every month. Is there any leeway/dispensation on the upload requirement date?</p>	<p>Almost all GMPF employers are currently able to meet these deadlines and so we intend to keep them the same. However, if you have difficulties for some reason, we will work with you to identify these and if necessary put different requirements in place. Our Employer Liaison Team will work with you to do this.</p>	No
2	Scheme employer 1	11	Provide scheme member pay and contribution data to GMPF	<p>Section 3.2 Contributions and Payments</p> <p>In my email of 28th February I commented on the fact that due to payroll processes in place that our payroll provider may not be able to send through the monthly upload until fourth working day of the month, but I have asked by our Exit Management Team in our payroll provider have asked if there was any further leeway on the day on which the monthly upload is to be sent through via i-Connect? From what I understand, our payroll provider has asked me to provide some further comments on the monthly upload date and whether there is any possibility that this case slightly extended to seventh working day, to allow some slippage in case of payroll issues. Every effort will be made to submit the upload by fourth working day, but would ask if there is some scope to allow an additional few days in case there are issues?</p>	<p>See response 1</p>	No
3	Scheme employer 1	21	n/a	<p>Section 6 Actions where there is non-compliance</p> <p>The amounts shown in the charging strategy for non-compliance do seem rather high and we would ask how these charges were arrived at? Are the penalty charges set by GMPF or are these generic to all employers within the LGPS and levied by other administrators of the scheme? Is there any possibility of relooking at the amounts set?</p>	<p>The charges proposed GMPF are based on the anticipated additional resource that is expected to be needed to identify, report and remedy non-compliance. Analysis has been carried out to ensure these are comparable with those of other LGPS Pension Funds and those of other similar pension schemes. We will though keep this under review. Also, we understand that on occasion there may be extenuating circumstances behind an employer's performance. Therefore, we will look at these issues on a case by case basis before deciding whether a charge is warranted. Once a charge has been authorised, the employer's main contact will be written to with details of the breach together with an invoice for the amount. The Pensions Regulator expects pension funds to be exercising their discretion to fine employers where data and payment accuracy or timeliness does not meet requirements, and so we believe our stance is in line with the Regulator's guidance on this area.</p>	No

4	Payroll provider 1	n/a	n/a	GMPF firstly needs to adopt efficient and effective processes themselves - see 6. below	One of the aims of the Pension Administration Strategy is to help to ensure efficiency. If all GMPF employers are able to provide accurate and timely data there is no reason why all GMPF processes would not be efficient.	No
5	Payroll provider 1	n/a	n/a	There is no reference to GMPF responsibilities, timescales and KPI's - so employers and payroll providers must act within agreed timescales, but GMPF can take as long as they want?	The aim of the Pension Administration Strategy is to provide clarity to employers about what is expected of them as an LGPS and GMPF employer. GMPF's Management Panel is the body responsible for ensuring the Administration section adhere to its responsibilities on behalf of all employers. The Panel agree and review the performance indicators to be used and analyse the section's performance each quarter against them.	No
6	Payroll provider 1	n/a	n/a	Can employers and/or payroll providers apply fines and penalties back to GMPF?	There is no facility for this within the LGPS regulations. The Pensions Regulator is the body that oversees GMPF's performance and it has the ability to apply fines and penalties if the pension fund is not carrying out its duties.	No
7	Payroll provider 1	n/a	n/a	There needs to be defined roles and responsibilities within GMPF with named contacts – this is to enable employers and/or payroll providers to escalate Fund performance issues back to GMPF	GMPF has an Employer Support section and Employer Liaison team whose sole role is to provide support to employers. It also has a dedicated Employer Helpline, website and email inbox, and every quarter we offer a face to face employer training event. Because we are a reasonably large organisation, and people often move teams and section, we encourage employers to contact the Employer Liaison team rather than an individual to ensure they always get through to a person who can help. However, there are no issues with employers ringing any GMPF manager should they want to escalate a problem.	No
8	Payroll provider 1	n/a	n/a	There should be a mechanism for GMPF engage and communicate with both employers and payroll providers - to ensure that procedures and timescales are adequately communicated and that they are fully understood by all stakeholders	We try to do this whenever possible. We obviously rely on people keeping us up to date with contact information. It is important to note though that GMPF only has a legal relationship with the employer and not with their payroll provider.	No
9	Payroll provider 1	n/a	n/a	There should be a mechanism for GMPF to offer and provide additional support to employers and/or their payroll providers, if needed	See response 7	No
10	Payroll provider 1	n/a	n/a	Errors, issues, queries wherever possible should be communicated to both the employer and payroll provider. The payroll provider cannot be expected to pick up any fines or penalties if there has been a delay in the employer sending these to the payroll provider. Note: Many i-Connect queries go from GMPF to LEA to employer and then to payroll provider – where the same email is often just forwarded from one party to the next. I re-iterate previous comments that this is, in my opinion, the least efficient process imaginable and often the cause of delay in us being able to respond in a timely manner – i.e. sickness and school holidays	We understand your frustrations, however unfortunately GMPF only has a legal relationship with the employer and therefore it is the employers responsibility to ensure they put the necessary procedures in place with their payroll provider, whether that be an internal department or outsourced provider. Our experience shows that employers change their payroll provider but do not always inform GMPF of this, or do so in a timely manner. Therefore, direct communication could lead to significant data breaches. Plus, roles and responsibilities between employers and their providers differ across organisations and therefore it would not be feasible for GMPF to keep track of this across all its employers.	No
11	Payroll provider 1	n/a	n/a	Timescales and deadlines do not take into consideration of school holidays where there may be a query for the employer to respond to before an answer can be given by the payroll provider	We understand there may be some circumstances that prevent individual queries being resolved quickly. However, after having checked with several other employers, this appears to be a very small number, and as such we do not feel it warrants a change for all timeframes.	No

12	Payroll provider 1	11	Provide scheme member pay and contribution data to GMPF	1st of following month for i-Connect monthly return data (including P8) is totally unrealistic and unachievable – for some employers, the pay date can be the last working day of the month ... and what about February if the last day of the month falls on a Friday. Note: Even Teachers’ Pensions have realised that their 7th of the following month deadline is no longer realistic and are extending this!!	Almost all GMPF employers are currently able to meet these deadlines and so we intend to keep them the same. In order to pay people on the last day of the month (as we do ourselves with over 105,000 of our pensioners), our payroll timetable is set in order to ensure all payments reach their intended recipients on time. We can only suggest that you may wish to review your payroll processing timeframes or speak to us to see if another arrangement can be accommodated for you.	No
13	Payroll provider 1	11	Provide scheme member pay and contribution data to GMPF	In addition to 8 above, LEA school i-Connect returns must be submitted to the LEA first – again, making 1st of the following month totally unrealistic and unachievable	Other payroll providers have informed us that there are no issues with achieving this and therefore we can only suggest that you speak to us to see if another arrangement can be accommodated for you.	No
14	Payroll provider 1	21	Actions where there is non-compliance	Fines and penalties should be a last resort, not the first course of action to be taken. In addition, we feel that the proposed fixed penalties are excessive and anti-competitive	See responses 1 and 3	No
15	Academy 1	11	Provide scheme member pay and contribution data to GMPF	Locally agreed deadline / target: "The data return must be submitted on the date that has been agreed and no later than by the first working day of the month following the month of deductions" The draft submission date that has been drafted is the first working day of the month following the month of deductions which is not workable due to the nature of the payroll close down dates. We would not be able to achieve this submission date as we could not reconcile contributions in time for such a tight deadline after processing. We would propose the same date that the contributions are paid over as a realistic achievable date of 19th of the month. We have been submitting the data 13-15th of the month since onboarding. In previous discussions with the fund it has been mentioned that a special arrangement could be made where the first working day is not achievable for employers.	See response 1	No
16	School 1 (using payroll provider 1)	21	Actions where there is non-compliance	Fines and penalties should be a last resort, not the first course of action to be taken. We also feel that the proposed fixed penalties are excessive. There should be a mechanism for GMPF to offer and provide additional support to employers and/or their payroll providers, if needed.	See response 3	No
17	School 1 (using payroll provider 1)	11	Provide scheme member pay and contribution data to GMPF	1st of following month for i-Connect monthly return data (including P8) is both unrealistic and will often be unachievable especially if the pay date is the last working day of the month and on a Friday. Timescales and deadlines do not take into consideration either school holidays or sickness absences at the school. In addition, LEA school i-Connect returns must be submitted to the LEA first – again, making 1st of the following month totally unrealistic and unachievable. Note: Teachers’ Pensions have realised that their 7th of the following month deadline is no longer realistic when monthly contribution returns are introduced and are extending this by a further 7 days	See response 12	No

18	School 1 (using payroll provider 1)	n/a	n/a	GMPF firstly needs to adopt efficient and effective processes themselves. There is no reference to GMPF responsibilities, timescales and KPI's – so employers and their payroll providers must act within agreed timescales, but GMPF can take as long as they want. How can this be fair?	See responses 4 and 5	No
19	School 1 (using payroll provider 1)	n/a	n/a	There needs to be defined roles and responsibilities within GMPF with named contacts – this is to enable employers and/or their payroll providers to escalate Fund performance issues back to GMPF	See response 7	No
20	School 1 (using payroll provider 1)	n/a	n/a	For the reasons stated in 2 above, there should be a mechanism for GMPF to engage and communicate with both employers and payroll providers - to ensure that procedures and timescales are adequately communicated and that they are fully understood by all stakeholders Errors, queries or issues, if communicated with the employer (school) only will increase the likelihood of deadlines being missed, especially during school holidays or sickness absences	See responses 8 and 10	no
21	School 2 (using payroll provider 1)	21	Actions where there is non-compliance	Fines and penalties should be a last resort, not the first course of action to be taken. We also feel that the proposed fixed penalties are excessive. There should be a mechanism for GMPF to offer and provide additional support to employers and/or their payroll providers, if needed.	See responses 1 and 3	no
22	School 2 (using payroll provider 1)	11	Provide scheme member pay and contribution data to GMPF	1st of following month for i-Connect monthly return data (including P8) is both unrealistic and will often be unachievable especially if the pay date is the last working day of the month and on a Friday. Timescales and deadlines do not take into consideration either school holidays or sickness absences at the school. Note: Teachers' Pensions have realised that their 7th of the following month deadline is no longer realistic when monthly contribution returns are introduced and are extending this by a further 7 days	See response 12	no
23	School 2 (using payroll provider 1)	n/a	n/a	GMPF firstly needs to adopt efficient and effective processes themselves. There is no reference to GMPF responsibilities, timescales and KPI's – so employers and their payroll providers must act within agreed timescales, but GMPF can take as long as they want. How can this be fair?	See responses 4 and 5	no
24	School 2 (using payroll provider 1)	n/a	n/a	There needs to be defined roles and responsibilities within GMPF with named contacts – this is to enable employers and/or their payroll providers to escalate Fund performance issues back to GMPF	See response 7	no
25	School 2 (using payroll provider 1)	n/a	n/a	For the reasons stated in 2 above, there should be a mechanism for GMPF to engage and communicate with both employers and payroll providers - to ensure that procedures and timescales are adequately communicated and that they are fully understood by all stakeholders Errors, queries or issues, if communicated with the employer (school) only will increase the likelihood of deadlines being missed, especially during school holidays or sickness absences	See responses 8 and 10	no

26	College 1 (using payroll provider 1)	21	Actions where there is non-compliance	Fines and penalties should be a last resort, not the first course of action to be taken. We also feel that the proposed fixed penalties are excessive. There should be a mechanism for GMPF to offer and provide additional support to employers and/or their payroll providers, if needed.	See responses 1 and 3	no
27	College 1 (using payroll provider 1)	11	Provide scheme member pay and contribution data to GMPF	1st of following month for i-Connect monthly return data (including P8) is both unrealistic and will often be unachievable especially if the pay date is the last working day of the month and on a Friday. Timescales and deadlines do not take into consideration either school holidays or sickness absences at the school Note: Teachers' Pensions have realised that their 7th of the	See response 12	no
28	College 1 (using payroll provider 1)	n/a	n/a	GMPF firstly needs to adopt efficient and effective processes themselves. There is no reference to GMPF responsibilities, timescales and KPI's – so employers and their payroll providers must act within agreed timescales, but GMPF can take as long as they want. How can this be fair?	See responses 4 and 5	no
29	College 1 (using payroll provider 1)	n/a	n/a	There needs to be defined roles and responsibilities within GMPF with named contacts – this is to enable employers and/or their payroll providers to escalate Fund performance issues back to GMPF	See response 7	no
30	College 1 (using payroll provider 1)	n/a	n/a	For the reasons stated in 2 above, there should be a mechanism for GMPF to engage and communicate with both employers and payroll providers - to ensure that procedures and timescales are adequately communicated and that they are fully understood by all stakeholders Errors, queries or issues, if communicated with the employer (school) only will increase the likelihood of deadlines being missed, especially during school holidays or sickness absences	See responses 8 and 10	no
31	Local Authority 1	6-9	Scheme member events	Notification of starters, leavers and changes – for these categories the locally agreed deadline/target states notification must be on the data return for the month that the member started, left or details changed or on an earlier month's return. There are situations (albeit not always) where notification is either effective at the end of the month or received late and it maybe that because of this, notification to GMPF will be on the data return for the month after the effective date or the month when we received later notification of the starter, leaver or change.	Thank you. We will amend to say 'or the month after if not possible'. We recognise that there will always be anomalies and that there will also be times where issues beyond your control have led to notifications being late, and we would expect to take a pragmatic approach to these. However, we think it is reasonable to set out what ideal deadlines and target dates are, in order to ensure statutory requirements are met, processes are efficient and costs kept to a minimum.	Yes
32	School 3 (using payroll provider 1)	21	Actions where there is non-compliance	Fines and penalties should be a last resort, not the first course of action to be taken. We also feel that the proposed fixed penalties are excessive. There should be a mechanism for GMPF to offer and provide additional support to employers and/or their payroll providers, if needed.	See responses 1 and 3	no
33	School 3 (using payroll provider 1)	11	Provide scheme member pay and contribution data to GMPF	1st of following month for i-Connect monthly return data (including P8) is both unrealistic and will often be unachievable especially if the pay date is the last working day of the month and on a Friday. Timescales and deadlines do not take into consideration either school holidays or sickness absences at the school	See response 12	no
34	School 3 (using payroll provider 1)	n/a	n/a	There is no reference to GMPF responsibilities, timescales and KPI's –	See response 5	no

35	School 3 (using payroll provider 1)	n/a	n/a	There should be some equity on expectations and consequences	See responses 1 and 3	no
36	School 3 (using payroll provider 1)	n/a	n/a	There needs to be defined roles and responsibilities within GMPF with named contacts – this is to enable employers and/or their payroll providers to escalate Fund performance issues back to GMPF	See response 7	no
37	School 3 (using payroll provider 1)	n/a	n/a	For the reasons stated in 2 above, there should be a mechanism for GMPF to engage and communicate with both employers and payroll providers - to ensure that procedures and timescales are adequately communicated and that they are fully understood by all stakeholders. Errors, queries or issues, if communicated with the employer (school) only will increase the likelihood of deadlines being missed, especially during school holidays or sickness absences	See responses 8 and 10	no
38	School 4 (using payroll provider 1)	21	Actions where there is non-compliance	<p>Further to the email dated 20/1/2020 regarding the consultation for the PAS, I am writing on behalf of the Governors Of our school to express my deep concern at the proposed changes to GMPF administration. As a VA school we are the employer and as such we moved to a different payroll provider some years ago. We have worked closely with the Local Authority to iron out any difficulties and now have a system that provides an excellent service to the school and its staff whilst at the same time meeting our statutory duties with the LA. The proposed changes would, it seems to me, severely impede our ability to meet these requirements and do not in any way reflect the working practises of a primary school (Office staff working TTO, inability to back fill short term sickness of key staff etc). Members of the GMPF work in a variety of different settings and it is important that the PAS reflects this.</p> <p>We are a small primary school and the penalties described could have a severely detrimental impact on funding for our pupils. Fines and penalties should be used as a last resort, not the first course of action to be taken. We also feel that the proposed fixed penalties are excessive.</p>	See responses 1 and 3	no
39	School 4 (using payroll provider 1)	n/a	n/a	There should be a mechanism for GMPF to offer and provide additional support to employers and/or their payroll providers, if needed.	See response 7	no
40	School 4 (using payroll provider 1)	11	Provide scheme member pay and contribution data to GMPF	Timescales and deadlines do not take into consideration either school holidays or sickness absences at the school. 1st of following month for i-Connect monthly return data (including P8) is both unrealistic and will often be unachievable especially if the pay date is the last working day of the month and on a Friday. In addition to this, as a maintained school, LEA school i-Connect returns must be submitted to the LEA first, making 1st of the following month a totally unrealistic expectation. (I note that Teachers' Pensions have realised that their 7th of the following month deadline is no longer realistic when monthly contribution returns are introduced and are extending this by a further 7 days)	See response 12	no

41	School 4 (using payroll provider 1)	n/a	n/a	This seems to be a very one sided process that is at odds with working agreements we have with other organisations. GMPF firstly needs to adopt efficient and effective processes themselves.	See responses 4 and 5	no
42	School 4 (using payroll provider 1)	n/a	n/a	There is no reference to GMPF responsibilities, timescales and KPI's meaning that employers and their payroll providers must act within agreed timescales, but GMPF can take as long as they want. How can this be fair?	See response 5	no
43	School 4 (using payroll provider 1)	n/a	n/a	There needs to be defined roles and responsibilities within GMPF with named contacts – this is to enable employers and/or their payroll providers to escalate Fund performance issues back to GMPF	See response 7	no
44	School 4 (using payroll provider 1)	n/a	n/a	For the reasons stated in 2 above and in recognition of the range of partners GMPF provide a service for, there should be a mechanism for GMPF to engage and communicate with both employers and payroll providers - to ensure that procedures and timescales are adequately communicated and that they are fully understood by all stakeholders. Errors, queries or issues, if communicated only with ourselves, will increase the likelihood of deadlines being missed, especially during school holidays or sickness absences	See responses 8 and 10	no
45	Admission body 1	13-14	Governance	From experience we have found it difficult when trying to obtain 'Admitted Body Status' following a transfer of services to establish who the Scheme Employer is, especially in a 2nd generation TUPE scenario. In order to complete a smooth transition it would help that that on page 13/14 there is a column confirming/stipulating who is the current 'Scheme Employer', following 'Notify GMPF of any bulk / TUPE transfers that are planned'. Would this be something you would consider?	Thank you. Yes, we have added some additional wording here.	Yes
46	Scheme employer 2	n/a	n/a	In comparison with previous strategy (2015), which asked for 90% compliance rate, this appears to ask for 100%. This is an impossible undertaking, as with the best of effort, mistakes happen.	See response 31	no
47	Scheme employer 2	11	Provide scheme member pay and contribution data to GMPF	Data must be returned by the 1st working day of the month following payment of salary. *This allows very little room for error with running the report, resolving any issues and paying over the amount. Any errors not fixed in time we could then be fined for.	See response 12	no
48	Scheme employer 2	10	Pay all employee and employer contributions to GMPF	Payments must be made on 1st working day of the month following payment of salary. * This is a very short turn around * We have three pension schemes and GMPF is the last to move to monthly data collection. Processes that previously spanned a few weeks are now all being pushed to the same period.	See responses 1 and 12	no
49	Scheme employer 2	6-12	Scheme member events	You are asking for information to always be provided in the month that it happens (e.g. new starter for Jan to pull through in Jan) * There are sometimes issues with staff being put on the system late, or dates change. * This is out of our control. * This document does not allow any flexibility for this.	See response 31	no

50	Scheme employer 2	21	Actions where there is non-compliance	There are large financial penalties for any error * How have the amounts been determined? What is the justification? * Where is this money going? * Internally this could cause great issues between teams - if we are being charged, which team is blamed? Who is this costed to? – There are various teams involved in all of these processes.	See response 3	no
51	Scheme employer 2	n/a	n/a	The document does not include our expectations of GMPF – how long do you have to get back to us with queries, resolve issues etc.	See response 5	no
52	Scheme employer 2	6-12	Scheme member events	You want all requests to be responded to within 10 working days. *If queries are historic, this requires accessing a different payroll system, which takes more time. * Depending on workload, this may not be feasible	See response 31	no
53	Scheme employer 2	21	Actions where there is non-compliance	We of course appreciate the importance of getting the data right and over to you in a timely manner, but the expectations and financial penalties referred to in this document are excessive and divisive. This will ruin any good will between Employers and GMPF staff.	See response 3	no
54	Admission body 2	10	Band and re-band employee contributions	Within the contributions and payments section, there is a line which says band and re-band employee contributions. Do you send the list of bandings through so we can adjust the payroll for the April payment	Yes we do. We will send you a notification each year as soon as the new bands are confirmed.	No
55	Admission body 2	13	Appoint an Independent Registered Medical Practitioner (IRMP) in order to opine on ill health retirement cases	Within the Governance section, Appoint an Independent Registered Medical Practitioner for any ill health retirement cases. Do you have an approved list to choose from or do we just allocate a local Practitioner.	We have an approved list. You can also nominate a practitioner for approval to be added to the list. Please speak to our Employer Liaison team or see our Employer Website for more information.	No
56	Admission body 2	n/a	n/a	You say there will be fines if we do not send information by a set date. We have had problems in the last few months receiving the data from the Council pension team. Can you confirm if the delay is due to their tardy reply to our requests that we will not be fined. An example of one was an employee retiring and we need past pension data from them. We were told they had some information to do for the teachers and we would be put at the bottom of the pile and it would be at least 3 weeks before they could look at it. If we send email proof of this nature, would this suffice.	We would not look to penalise any employer where this was the case. Our Employer Liaison team would look to work with you and colleagues at other employers to help to resolve any issues expediently.	No
57	Local Authority 2	6	Notify new joiners to GMPF	Joining the LGPS Statutory deadline / target: Differs from the AE guidelines which state 6 weeks not 2 months	It is not always possible for us to be able to identify which members have been auto-enrolled or re-enrolled from the data supplied by employers or the data held on the pension database. Therefore, we think it is reasonable to assume that if notifications are sent to all joiners within two months of joining then the Administering Authority has met	No
58	Local Authority 2	6	Notify new joiners to GMPF	Joining the LGPS Locally agreed target: Joiner notifications must be on the data return ... or an earlier month . This is not relevant and not possible as a new starter may not actually start work in reality.	See response 31. This will be amended.	No
59	Local Authority 2	6	Notify new joiners to GMPF	* Need to add: the month after for late starters.	See response 31. This will be amended.	no

60	Local Authority 2	7	Submit opt out notifications received to GMPF	<p>Joining the LGPS Under auto enrolment..... By the end of the next pay period: needs to reflect that next pay period. *Opt out notifications must be on the data return for the pay period that the member opted out: add 'or the following month'. * Add: as start date if less than 3 months. * to raise separately with John or Paul at GMPF.</p>	Thank you. We will amend to say 'or the month after if not possible'. We recognise that there will always be anomalies and that there will also be times where issues beyond your control have led to notifications being late, and we would expect to take a pragmatic approach	Yes
61	Local Authority 2	7	Notify all changes to member details... hours... and breaks in membership	<p>Changes in circumstances Add: NINO changes. * Query under what Regulation hours and breaks in membership needed – is this to prepare for McCloud outcome? * All changes must be on the data return in respect of the pay period when the change in circumstances was made: would be the month after at best. * All changes must be on the data return in respect of the pay period when the change in circumstances was made: at worst do breaks in service when member leaves. * Why are breaks in service on monthly service? * Those submitting an online return to I-Connect must submit breaks in service using the P5 spreadsheet: can only do 1 hours change in a month so wouldn't be current.</p>	The LGPS regulations require the employer to give us whatever information we need to carry out our functions to ensure the correct payment of benefits (regulation 80(1)(B)). GMPF have decided to request confirmation of hours and breaks in service to enable us to reasonability checks when processing benefits, to avoid unnecessary queries being sent to employers and avoid incorrect payment of benefits. We will amend the wording to reflect reasonable timeframes.	Yes
62	Local Authority 2	8	Notify early leavers	<p>Leavers, retirements and death in service Leaver notifications must be on the data return for the month that the member left, or on an earlier month's return: No – this must reflect the statutory deadline.</p>	See response 31. This will be amended.	no
63	Local Authority 2	8	Notify immediate retirements	<p>Leavers, retirements and death in service Retirement notifications must be on the data return for the month that the member retired, or on an earlier month's return: there is no allowance for immediate resignation, withdrawal of pension or urgent ill health retirement.</p>	See response 31. This will be amended.	no
64	Local Authority 2	8	Notify deaths in service and determine eligibility for survivor benefits	<p>Leavers, retirements and death in service *A call should be made or email sent immediately to notify GMPF....: pensions team alert GMPF as soon as they are made aware which may not be when the member dies or manager notified. * DIS notifications must be on the data return for the month that the member died, or the following month at the latest: Our months go 1st to 31st but many of our payrolls run mid month so a death between 12th (when we run payroll) and the 31st - wouldn't be reported until the following month. So more than half our death in service cases will be reported the month after on iConnect.</p>	Thank you. We have amended the wording slightly. We are keen to emphasise that we would like to be notified as soon as possible so as to prevent any correspondence being sent out to the member. We appreciate that circumstances may vary regarding notifications and would seek to take a pragmatic approach.	Yes
65	Local Authority 2	9	Provide pay or other information that GMPF need in order to respond to annual or lifetime allowance matters / divorce / similar enquiries	<p>Estimate and pay information * Responses expected to be received within 10 working days, or 5 where a member is awaiting payment: What if 24 December? * What about GMPF and / or Employer shut down periods? * For the annual AA exercise the GMPF request full calculations of final pay. As we are a large employer it is likely that we would receive a high number of these (relative to smaller employers) the deadline to complete and return</p>	Thank you. We will add some text to confirm that timescales will be adjusted over the Christmas period and where the number of requests is particularly significant.	Yes

66	Local Authority 2	10	Band and re-band employee contributions	<p>Contributions and payments</p> <p>Details must be supplied on the monthly data return submission in respect of the pay period when the change of band was made: * This is not possible with retrospective pay awards</p>	Thank you. We will add text to this effect.	Yes
67	Local Authority 2	10	Pay all employee and employer contributions to GMPF	<p>Contributions and payments</p> <p>* Payments must be made by BACS.... we pay by CHAPS. * Payments must be made by the 1st working day of the month following the month of deduction: This is the current approach and is OK although we agreed with GMPF for 6 January due to shutdown.</p>	Thank you. We will expand the text to reflect these points.	Yes
68	Local Authority 2	11	Send a remittance advice to accompany all payments to the GMPF	<p>Contributions and payments</p> <p>Form P8 must be received by the first working day of the month following the month of deduction: * This is linked to the payments section below</p>	See response 1	no
69	Local Authority 2	11	Provide scheme member pay and contribution data to GMPF	<p>Contributions and payments</p> <p>The data return must be submitted on the date that has been agreed and no later than by the first working day of the month following the month of deduction: * OR no later than 30 days of payday * Opted out school issues * Impossible for opted out schools using end month pay dates * we do not submit I-Connect until after month end * End month schools cannot do 2 uploads so can't upload</p>	See response 1 and 12	no
70	Local Authority 2	11	Pay AVC deductions from pay to the AVC provider	<p>Contributions and payments</p> <p>Payment must reach the AVC provider within 1 week of deduction: * Why is this relevant to the GMPF? * Mid and end months contributions are currently paid over as one. * AVC contributions are paid to provider on 1st of the month, the same day as contributions go to the GMPF * We don't do AVC deductions for opted out schools</p>	Thank you. We will amend the wording to say by 1st month or earlier if possible.	Yes
71	Local Authority 2	12	Ensure any changes to the employer contribution rate are implemented by the effective date	<p>Contributions and payments</p> <p>This will depend on when the Fund notify us of the rates as we need to commission changes to the payroll system via ICT for us and for our bureau employers</p>	Noted. We can confirm that we aim to notify all employers as soon as rates are confirmed. We will always look to take a pragmatic approach where there are extenuating circumstances.	No
72	Local Authority 2	12	Respond to all queries sent by GMPF about any data or payments submitted	<p>Contributions and payments</p> <p>Responses are expected to be received within 10 working days: * Not normally feasible for opted out schools</p>	See response 31	no
73	Local Authority 2	13	Appoint an IRMP in order to opine on ill health retirement cases	<p>Governance</p> <p>The form should be submitted 2 months in advance of the IRMP being used for the first time: need to make this clear that the responsibility is with the prospective IRMP i.e. for them to be approved by the GMPF prior to being put on to their approved list</p>	We believe the responsibility lies with the employer who is engaging the IRMP to ensure all procedures have been sufficiently completed.	No
74	Local Authority 2	16	Licence holders have access to the pension records of their employer's contributing members and can amend address data	<p>Scheme employers – additional responsibilities of those with access to Altair</p> <p>Add: or use I-Connect?</p>	There are no additional i-Connect responsibilities for those who also have access to Altair, and therefore we think the text in section 3.3 covering I-Connect should be sufficient.	No

75	Local Authority 2	20	GMPF will monitor employer performance....	<p>How performance will be monitored</p> <p>These are statistical measures and need to be used with caution cognisant of the employer's membership and activity profile etc. For example, and large employer may have a large ex-manual workforce, receive a large number of deferred / active ill health requests, some of which will invariably be 'no' or at a lower tier, and result in an complaint / IDR. This does not mean that the employer is doing anything untoward. Numbers do not tell the whole story.</p>	Noted. We agree and would always endeavour to provide context where possible in our reporting.	No
76	Local Authority 2	21	Actions where there is non-compliance	What is the dispute mechanism for the employer / payroll provider?	We would hope that any disputes could be resolved locally upon discussion. However, if these cannot be resolved, the matter would be referred to GMPF's Management Panel.	Yes
77	Local Authority 2	21	Actions where there is non-compliance	* Need caveat on timescales where GMPF systems go down / are not accessible by employers etc	As mentioned, in these scenarios we would always look to take a pragmatic approach. There could be any number of scenarios where this might be the case and so we will look to add some wording accordingly.	Yes
78	Local Authority 2	21	Actions where there is non-compliance	Where is the copy of the data sharing agreement / privacy notice with Haywards?	We are unsure what this is referring to. Our data privacy notice is available on the GMPF website.	No
79	Local Authority 2	21	Actions where there is non-compliance	<p>Fixed penalty £500 plus fixed penalty £50 per day after that deadline:</p> <p>* Punitive</p> <p>* Why £500 – how has this been arrived at i.e. what extra work / obligation do GMPF incur to warrant this?</p>	<p>See response 3.</p> <p>In line with the Pension Regulator's Code of Practice, GMPF has to assess all instances of non-compliance and must assess and record all breaches of law. A team of eight colleagues representing GMPF as the scheme manager meet each month to make these assessments and to record them in line with the Pension Regulator's guidance. They then assess if any breach is material and requires reporting to the Pensions Regulator. All this information is then presented to GMPF's Local Pension Board each quarter so that they can also assess if any breaches require reporting to the Regulator. This requires a considerable amount of resource in addition to the resource that is needed to rectify or manage the issue itself. Having already dealt with and charged employers for additional costs in recent years, which might include rewriting to members, dealing with complaints and so on, we believe the actual costs may often be higher than what we have estimated. However, we agree to monitor this.</p>	No
80	Local Authority 2	21	Actions where there is non-compliance	How does this tally with the admin fee of £300k pa we pay already within their employer contributions?	The overall aim of the Pension Administration Strategy, and aim of the Pension Regulator's guidance is to improve the accuracy and timeliness of data. As such, this should reduce GMPF's administration costs and thus employer costs as processes will be more efficient and less resource will be needed to manage issues.	No
81	Local Authority 2	21	Actions where there is non-compliance	* What mechanism is there in place for employers to pass on charges for re-work, delay, penalties we incur resulting from errors and system failures at the GMPF?	There is no mechanism for this, but we would ask that you raise any issues with the Employer Liaison team so that we can ensure they are resolved as best as possible. One of the main aims is to ensure that, if one employer fails to carry out its duties, that all other employers are not paying for this, as will have been the case for many issues in the past.	No

82	Local Authority 2	21	Actions where there is non-compliance	<p>* Failure to respond within timeline may encourage employers to respond but may compromise the quality and thoroughness of that response. * Opted out schools – do they not notify the LA or GMPF directly?</p> <p>* Would the school be fined or LA should the school not tell the LA / GMPF of a change of provider and the subsequent penalty events occur?</p> <p>* £500 plus £100 for each chase up – how are those figures justified for a chase up (probably template) email?</p>	<p>See response 79.</p> <p>This depends on who the scheme employer is. We are aware that several local authorities and other employers who have adopted their own SLAs or non-compliance penalties for third party data providers, whether that be opt out schools or payroll providers, that have helped them to meet deadlines or to pass on penalties.</p>	No
83	Local Authority 2	22	Actions where there is non-compliance	<p>In general, the GMPF will apply a financial penalty where an employer fails to....meet the requirements of the LGPS regulations and the requirements of other legislation...where this results in complaints by organisations or its members, appeals by members or their representatives.</p> <p>How does this work? How does this fit in with IDRPs, TPR and TPO cases and their fine structure and guides? Is there a danger of double jeopardy? What</p>	<p>One of the main aims is to ensure that if one employer fails to carry out its duties, and GMPF are subsequently fined for this, that all other employers are not paying for this. GMPF would endeavour to take a pragmatic approach when fines have already been levied to ensure they are reasonable.</p>	No
84	Local Authority 3	n/a	n/a	<p>Is the 2020 PAS only applicable at the point an Authority onboarded to MDC, i.e. the provision of the 2015 PAS stands until this point (as these are more applicable)?</p>	<p>It is envisaged that all employers, or the vast majority will have been onboarded by 1 April 2020 and that the 2020 Strategy will apply to all employers. However, where this is not the case, GMPF will work with that employer and will look to adopt a reasonable approach taking <u>advice from GMPF's Management Panel as appropriate</u></p>	No
85	Local Authority 3	21-22	Actions where there is non-compliance	<p>The fines set out in Section 6 are substantial and lack flexibility. It states these penalties will only be applied in the event GMPF incur costs due to poor performance – how will employers be notified of this provision being triggered and what has been the mechanism for establishing penalty levels?</p>	<p>See response 3</p>	no
86	Local Authority 3	11	Provide scheme member pay and contribution data to GMPF	<p>The deadlines associated with the submission of MDC and remittances, of 1st working day of the following month, is exceptionally tight especially for our end of month payrolls. The possible penalties for late submission could become exorbitant i.e. we have 22 employers and, as an example, if we were to submit 10 days late this would result in potential fines of £22,000 for one month.</p>	<p>See response 1</p>	no
87	Local Authority 3	21-22	Actions where there is non-compliance	<p>We do not believe that any penalties should be levied to an employer where a third party payroll provider is the cause of any underperformance (e.g. third party payroll providers to Schools). We also submit that performance related to third party providers should not be aggregated with the Council's performance for the purpose of employer performance statistics.</p>	<p>See response 82</p>	no
88	Local Authority 3	21-22	Actions where there is non-compliance	<p>Could the strategy define 'incorrect data' and clarify that this will not include queries on data submitted as this is to be anticipated.</p>	<p>Clarification queries would not automatically constitute incorrect data. An example of incorrect data would be where APP has not been included in CARE pay figures.</p>	No
89	Local Authority 3	21-22	Actions where there is non-compliance	<p>The minimum hourly rate to be charged in the event of incorrect data of £100 is high. How has this been calculated?</p>	<p>See response 79.</p>	no
90	Local Authority 3	21-22	Actions where there is non-compliance	<p>Of the penalties charged, how will this additional income be deployed?</p>	<p>The additional income will be used to fund the additional resources being used so that all employers are not paying for the additional or corrective work relating to one employer.</p>	No

91	Local Authority 3	n/a	n/a	How will performance be monitored and shared following the move to MDC?	We are intending to issue a report to all employers periodically to provide feedback on their own performance from a GMPF perspective and relative to peers. Performance information will also be shared with GMPF's Management Panel and Local Pension Board. This is something we will look at once the onboarding programme is complete.	No
92	Local Authority 3	n/a	n/a	As we are in the position of implementing a new HR and Payroll System, we have been advised not to move to MDC until all our organisations are moved onto the system and therefore one MDC submission. This, therefore, will not be in place by April. As this is an agreed and anticipated position, will the penalties detailed within the strategy be waived? If not, we request the breakdowns on cost calculation as above.	As this is a specific question and not feedback on the Strategy document itself, we will address this with you separately.	No