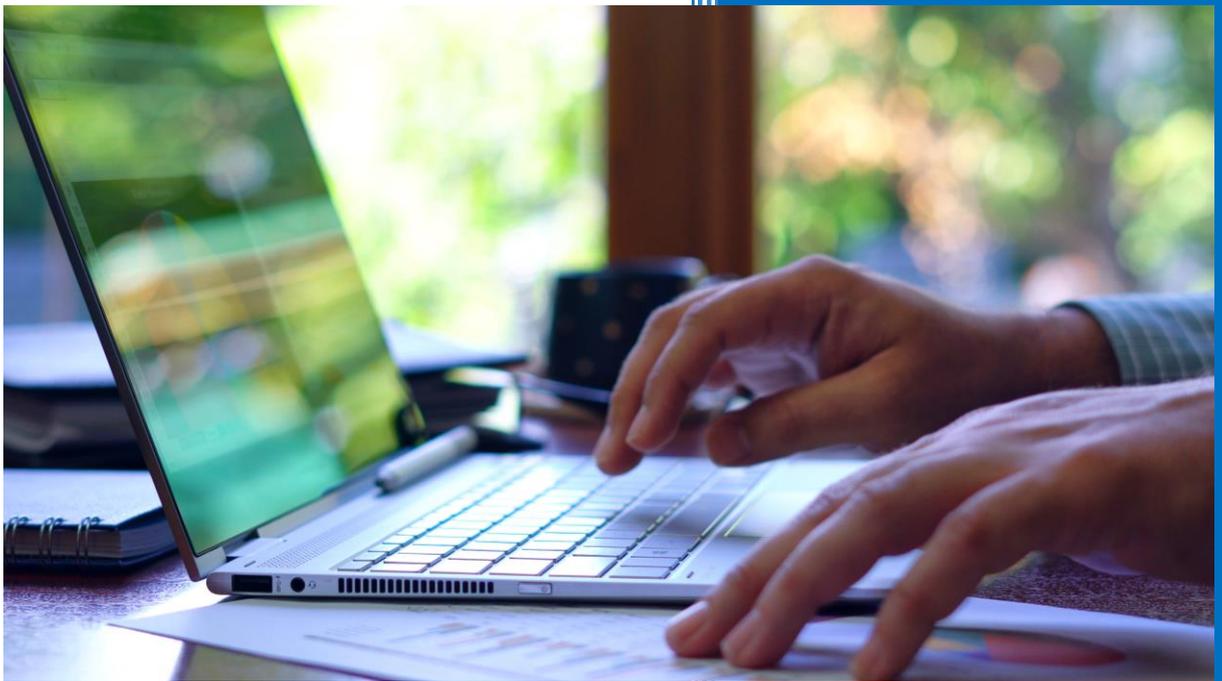


Pension Administration Strategy



June 2022

Pension Administration Strategy



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Introduction

This is the Pensions Administration Strategy (PAS) for the East Riding Pension Fund (the Fund) in relation to the Local Government Pension Scheme (the Scheme), which is administered by the East Riding of Yorkshire Council (the administering authority) on behalf of Scheme employers and Scheme members.

It sets out how the Fund will administer the Scheme on behalf of Scheme employers, its requirements for Scheme employers in terms of the timely and accurate provision of information for Scheme members and the procedure to be applied to those Scheme employers failing to meet their duties, responsibilities and obligations as detailed within this strategy.

The strategy has been developed and adopted in consultation with the participating Scheme employers and will be reviewed as follows:

- Every 3 years.
- Where regulatory or other legislative changes require it.
- As required by operational changes and demands.

Scope of the Strategy

The purpose of this strategy is to:

- Ensure the Fund and Scheme employers work together to provide a high-quality and efficient service to Scheme members by setting out the processes and procedures that both the Fund and its Scheme employers will follow.
- Ensure the effective communication and transfer of information between both parties.
- Define the roles and expected performance of the Fund and Scheme employers in meeting both the legal and regulatory duties of the Scheme administration as set out in the Pension Regulator's Code of Practice.
- Set out how underperformance will be monitored and managed.

Key objectives

The key objectives of the strategy are to set out:

- The responsibilities under the Scheme regulations and over-riding legislation for the Fund and Scheme employers.
- How the fund will ensure sufficient funds are available to meet all benefits as they fall due.
- How the Fund and Scheme employers will deliver their administrative functions.
- How benefits are administered in line with the Scheme regulations.
- How records are maintained for accurately calculating Scheme member benefits and Scheme employer liabilities.
- Standards for both the Fund and Scheme employers, and details how these standards are monitored and published.
- An effective method of communication for the Fund, the Scheme employers and Scheme members.
- How training will be provided to ensure the Fund and Scheme employers have the necessary skills to perform their functions.
- How the Fund will deliver an online efficient and secure administrative service for Scheme employers and Scheme members.

Regulatory framework

The Fund have developed this strategy under regulation 59 of the Local Government Pension Scheme Regulations 2013. This regulation requires the administering authority to prepare a written statement on:

- Procedures for liaison and communication with Scheme employers in relation to which it is the administering authority.
- Levels of performance which the administering authority and Scheme employers are expected to achieve in carrying out their duties under the Scheme which includes:-
 - setting performance targets;
 - defining levels of performance
- Detail procedures which must be followed to ensure compliance with statutory requirements; and set out expectations and actions to be taken on levels of performance.
- Detail procedures for improving communication by the administering authority and Scheme employers of information relating to those functions.
- The circumstances and procedures in which the administering authority may consider giving written notice to its Scheme employers under regulation 70 (additional costs arising from Scheme employer's level of performance) on account of a Scheme employer's unsatisfactory performance in carrying out its Scheme functions
- The publication by the administering authority of annual reports dealing with the extent to which that authority and Scheme employers have achieved the levels of performance established and such other matters that it considers appropriate.

Communication

The Fund has a digital first approach to communication, providing secure online areas to transfer data between Scheme employers and its members. However, the Fund realises that not everyone will want to contact us in this way and therefore will continue to provide contact details for each area of the section to allow Scheme employers to receive the support and information that they require. The Fund has also implemented a digital telephony system with a single helpline number which directs callers to the correct department. The Fund has a Communication Policy detailing how they communicate with Scheme members, representatives of Scheme members, prospective Scheme members, Scheme employers and prospective Scheme employers.

Responsibilities and Duties of the Fund

The Fund will administer the Scheme in line with the current Scheme regulations and any overriding legislation in force at the time.

The administration of the Scheme will take account of the statutory disclosure requirements and timescales. The levels of the Fund's performance will be measured and reported to the East Riding Pension Board (ERPB) for review and published in the Annual Report and Accounts each year.

The main tasks of the Fund are as follows:

- Create a Scheme member record for all new employees admitted to the Scheme.
- Maintain and update Scheme members records with any changes received by the Fund.
- Process Monthly Data Collection (MDC) files each month, including performing relevant validations and raise any relevant queries.
- Calculate and pay retirement benefits, deferred benefits and death in service benefits in accordance with the Scheme rules, Scheme members' options and statutory time limits.
- Notify Scheme members of a decision made regarding the Scheme benefits including their right of appeal under the Internal Dispute Resolution Procedure (IDRP).

- Provide one estimate per member, per year of any associated cost of potential retirement on request by the Scheme employer. The Fund also provides the facility for Scheme employers to perform their own estimate of any associated cost relating to a potential retirement using the online services.
- Provide every active, deferred and pension credit member with access to a benefit statement each year.
- Collect and reconcile Scheme employer and Scheme employee contributions.
- Secure a triennial actuarial valuation, at which time the Fund will submit the required data in respect of each Scheme member and provide statistical information over the valuation period to the Fund actuary so the assets and liabilities for each Scheme employer can be determined.
- Communicate the results of the triennial actuarial valuation to each Scheme employer.
- Publish a statement of the Funds policy on the use of its discretions. This policy will be reviewed, amended and publicised in line with the relevant regulations; A copy of the Fund's discretions can be found here: <https://www.erpf.org.uk/key-policies-and-documents/administering-authority-discretions/>.
- Nominate an officer to act as the adjudicator at both Stage 1 and Stage 2 of the appeals procedure where the appeal is received against the Fund under IDRPs. The Fund will also nominate an officer to deal with Stage 2 appeals, where the Stage 1 appeal was made against the Scheme employer.
- Prepare, publish and maintain its Communications Policy.
- Prepare, publish and maintain its Funding Strategy Statement.
- Comply with HMRC legislation and requirements of the Pension Regulator.

The above list is not exhaustive, and the main duties and responsibilities are detailed in the Local Government Pension Scheme Regulations 2013, Part 2 – Administration.

Responsibilities and Duties of the Scheme Employer

Disclosure and regulatory requirements

The main duties and responsibilities of a Scheme employer are detailed in the Local Government Pension Scheme Regulations 2013, Part 2 – Administration.

Scheme employers are responsible for providing timely and accurate data to allow the Fund to fulfil their legal obligations. This includes submitting monthly information to the Fund for the following events:

Event for notification	Timescale for submission
A new Scheme joiner	Within 6 weeks of the employee joining or the 15 th of the following month if MDC
A change in the Scheme section (50/50 or main)	Within 6 weeks of the change or the 15 th of the following month if MDC
A member leaves the Scheme without a right to immediate payment of benefits (including opting out of the Scheme)	Within 6 weeks of leaving the scheme or the 15 th of the following month if MDC
A member leaves the Scheme with a right to immediate payment of benefits	Within 2 weeks of leaving the Scheme
The death of an active member	Within 2 weeks of the date of death or date of notification if later
Changes to working pattern including contractual hours	Within 6 weeks of the change or the 15 th of the following month if MDC
Changes to an active member's name, address or other personal details	Within 6 weeks of the change or the 15 th of the following month if MDC
A period of authorised absence commences or ends (including child related absence and unpaid leave)	Within 6 weeks of the date of absence commencing or the date of absence ending
A member's intention to retire	Within 2 weeks prior to intended retirement date

The Fund is not responsible for verifying the accuracy of any information provided by the Scheme employer for the purpose of calculating benefits under the provisions of the Scheme. The Fund, however, will do their best to verify the reasonableness of data upon receipt but to be clear the responsibility for providing accurate information rests with the Scheme employer even where the payroll or HR function is carried out by a third party. Any over payment of pension benefits resulting from inaccurate information being supplied by the Scheme employer may be recovered by the Fund from that Scheme employer.

In the event of the Fund being fined by the Pensions Regulator, this fine will be passed on to the relevant Scheme employer where that Scheme employer's action or inaction caused the fine.

ERPF Online services

Scheme employers will administer the Scheme using ERPF Online services as it gives access to relevant data and information for their Scheme members. ERPF Online services ensures security of data transferred between Scheme employers and the Fund.

ERPF Online services allows Scheme employers to view and update their members records online using secure individual users accounts. New account holders will need to complete a User Declaration Form, that must be authorised by one of the following Scheme employer contacts:

- Organisation Contact
- Payroll contact
- HR contact

An individual account and login will be created for use by the authorised user only. As this portal contains personal member data it is important that Scheme employers consider who these contacts will be and that they have the relevant data protection agreements in place with any third-party providers. When a user no longer requires access to ERPF Online services it is the responsibility of one of the three Scheme employer contacts above to inform the Fund to deactivate the account.

Scheme employers must undertake an annual review of the users who have access to their data on the ERPF Online Services and must ensure that account holders are deactivated as soon as they are no longer entitled to access the Scheme employer's data.

Scheme employers will need to ensure that their main contacts monitor all work trays allocated, including the employer work tray and the authorised user work trays, to ensure that all work and queries in those work trays are responded to in a timely manner. Ideally all queries should be responded to within 10 days and queries which are marked as '** urgent **' should be given priority.

Payroll services and providers

If a Scheme employer changes their payroll provider, it is their responsibility to:

- Ensure all outstanding queries are cleared before moving to the new payroll provider, as access to the ERPF Online Services, for the old payroll provider will be removed after 1 month, unless permission for an extension is granted.
- To cleanse all member data before moving to the new payroll provider, as the new payroll provider will be unable to provide historic information. The Fund's Data and Employer Governance team will co-ordinate this.
- Submit a 'part year' submission for the period from 1 April to the date of change in payroll provider if the Scheme employer is not on Monthly Data Collection (MDC). If the Scheme employer is on MDC, they should ensure that the new payroll provider is able to continue uploading an accurate MDC submission, on time, each month.
- If a member leaves, to ensure a leaver form is provided to the Fund which covers the full 365 days prior the date of leaving and also for the provision of previous years pay details, if applicable.

Contracts for service provision with third party contractors

Scheme employers are responsible for:

- Advising the Fund of any planned outsourcing contracts to ensure that Scheme member pension provision is considered as part of the process.
- Ensuring that any members TUPE transferred to a third party contractor as part of an outsourced service provision are entered into the Scheme if required in a timely manner and the relevant information is provided to allow the Fund's actuary to accurately calculate the relevant employer contribution rate.
- Monitoring the performance of third-party contractors to ensure that they are adhering to the requirements of the Fund as set out in this strategy.

Scheme member contributions

Scheme members contributions are fixed within bands by the Regulations. Scheme employers are responsible for:

- Assessing and reassessing the contribution band that is allocated to a Scheme member.
- Informing the Scheme member of the contribution band that they have been allocated on joining the Scheme and when they have been reallocated to a different contribution band.

Monthly data collection (MDC)

From 1 April 2023 all Scheme employers must be signed up to Monthly Data Collection (MDC). Scheme employers are responsible for submitting MDC files in accordance with the specification and Principles of Submission issued by the Fund. The MDC submission should contain accurate Scheme member and Scheme employer contributions and accurate pay information. This will allow the Fund to reconcile the pension contributions and calculate Scheme member benefits. The file must be received by 15th day of the following month and the amount must match the payment received into the Fund's bank account.

Scheme employers will need to respond or action any individual queries raised, resulting from the previous MDC submission, before the next file can be submitted. Scheme employers must ensure that all 12 months MDC files are submitted by 15th April each year to allow the Fund to reconcile their pension contributions and to send Scheme members an annual benefit statement and pension savings statements where applicable.

Year-end submission

Scheme employers not signed up to MDC before 1 April 2022 are responsible for submitting a year end return detailing Scheme member and Scheme employer contributions and the accurate pay information. This will allow the Fund to reconcile the pension contributions, calculate Scheme member benefits and provide Scheme members with an annual benefit statement and pension savings statements where applicable. This submission must be made by the date instructed by the Fund when issuing the year end timetable.

Discretionary powers

The Scheme employer is also responsible for compiling, reviewing, and publishing a policy in respect of the key discretions, as required by the regulations, to Scheme members. The Scheme employer is responsible for exercising the discretionary powers given to them within the regulations.

The Fund provide guidance and a standard template for discretionary policies which are available here:

<https://www.erpf.org.uk/employers/employer-responsibilities/>

Internal Disputes Resolution Procedure (IDRP)

Under regulation 74 of the Local Government Pension Scheme Regulations 2013, Scheme employers must nominate an adjudicator to deal with any appeals in relation to a decision made by their organisation at Stage 1 of the IDRP. When concluding a Stage 1 appeal, Scheme employers are responsible for providing the Scheme member with details of the Stage 2 IDRP, the contact details of the Stage 2 adjudicator and the relevant deadlines for invoking the next stage.

Scheme employer authorised contacts

Scheme employers are required to submit contact details for their organisation as they are responsible for all aspects of administration for the Fund. Some of these responsibilities can be delegated to a third-party provider, but ultimately the information belongs to the Scheme employer, therefore they must have a nominated contact at the organisation. The Fund also asks that these details are reviewed and verified annually.

Contact	Purpose
Organisation Contact	This will be the main point of contact for information and pension updates including important events such as actuarial valuations and changes to Scheme regulations as well as discretions policies, agreeing the Fund policies, and resolving any issues that may arise. The organisation contact will need to consider all information provided and assess what impact this will have on their organisation and employees and will be responsible for ensuring that the Scheme employer and any contracted third parties perform their duties on their behalf satisfactorily. The organisation contact will automatically be given a login to the ERPF Online Services to enable them to view all outstanding work in relation to their Scheme Employers.
Payroll	This is the individual responsible for submitting a Scheme employer's pension information/forms and responding to queries from the Fund. This can be a third-party payroll provider, or a Scheme employer can nominate someone at the Scheme employer to co-ordinate sending and receiving pension information and queries. Scheme employers should ensure that they are aware of the performance of any third-party payroll provider, as poor performance can affect the Scheme employer's contribution rate. The Fund will provide performance information on request.
Human Resource (HR)	This is the individual responsible for estimates, ill health retirements and any queries around contractual arrangements. This can be a third-party HR provider, or a Scheme employer can nominate someone at the Scheme employer to co-ordinate sending and receiving pension information and queries. Scheme employers should ensure that they are aware of the performance of any third-party HR provider, as poor performance can affect the Scheme employer's contribution rate. The Fund will provide performance information request.
Data Protection Officer*	For GDPR compliance purposes, a Scheme employer must have an appointed Data Protection Officer (DPO) or nominated person who will be informed of any personal data breach or security incident and updated of the impact of GDPR on the Scheme and the Fund.
Over 12 Month Transfer Request	To consider transfer requests made by Scheme members received after the expiry of the regulatory 12 month deadline. If a separate nomination is not made, the Fund will use the organisation contact provided.
Internal Dispute Resolution Procedure (IDRP)*	The adjudicator appointed to deal with Stage 1 IDRP cases against the employer. If a separate nomination is not made, the Fund will use the organisation contact provided.
Monthly Data Collection (MDC)*	The contact for all aspects of Monthly Data Collection (MDC) submissions and requirements.
Statement of Contributions/Finance*	The contact for the submission of the annual Statement of Contributions.
IAS19/FRS17 /FRS102*	The contact dealing with the annual accounting exercise, where required.

Payment of Contributions

Scheme employers will make all payments required under the Scheme regulations, to the Fund and /or its Additional Voluntary Contribution (AVC) provider, the Prudential, as appropriate.

Scheme member and Scheme employer contributions must be received by the Fund no later than the 19th of the month (or the last working day where the 19th is not a working day) following the month the contributions relate to, and must be accompanied by a member breakdown using the Funds standard template, if requested by the Fund. In accordance with the Scheme regulations, interest may be charged on any payment of contributions which are received late by the Fund.

All costs associated to early retirement should be paid by lump sum prior to the payment of the Scheme members retirement benefits.

Any Additional Voluntary Contributions payments should be made directly to the AVC Provider by the 19th day of the month following the month in which the deductions were made.

Scheme employers may be reported to The Pensions Regulator (tPR) where contributions are persistently received late, in accordance with the Pension Regulator's code of practice.

Actuarial Services

Actuarial services are provided by the Fund actuary. This independent service is subject to periodic tender and the appointed actuary may change.

The actuarial valuation is a statutory requirement which is undertaken every three years. The actuary balances the Fund's assets and liabilities, which allows them to assess the necessary Scheme employer contribution rate for the subsequent three years.

The Fund will consult and work closely with Scheme employers to ensure that member and financial data relating to the Scheme employer's cash flow is accurate and up to date at all times. The Fund will also ensure that year end data or monthly data submissions, are accurate, timely and usable.

The Fund, working with our actuary, will consider a variety of factors in setting a Scheme employers contribution rate and may amend a rate between valuations where it believes there is a reasonable likelihood that there has been either:

- A change in liabilities arising or likely to arise.
- A change in the Scheme employer's ability to meet their obligations.

For the Fund to consider the need for a review, Scheme employers are required to notify the Fund when one or more of the following events occur or are likely to occur:

- Material change in Scheme membership.
- Material change in total Scheme employer payroll and Scheme pensionable pay.
- Change in Scheme employer legal status or constitution.
- A decision which will restrict the Scheme employer's active membership in the future.
- Any restructuring or other event which could materially affect the Scheme employer's membership.
- Confirmation of wrongful trading.
- Conviction of senior personnel.
- Decision to cease business.
- Breach of banking covenant.

Scheme employers are required to pay whatever is necessary to ensure that the portion of the fund relating to their organisation is sufficient to meet its liabilities.

Administration charges

The cost of running the Scheme is charged directly to the Fund and the Fund's actuary takes these costs into account in assessing Scheme employers' contribution rates.

Scheme employer Performance

The performance of Scheme employers will be monitored quarterly using the pensions software system. Where a Scheme employer is performing at a satisfactory level, no action will be taken.

The Fund will seek, at the earliest opportunity, to work closely with its Scheme employers to identify any areas of poor performance or misunderstanding of responsibilities, provide opportunities for necessary training and development. The Fund will initiate the Scheme Employer Unsatisfactory Performance Procedure, attached as appendix 1, which will assist the Scheme employer to improve the quality of their data and their performance which will increase the level of service delivery to their Scheme members.

If the Scheme employer does not engage or the Scheme Employer Unsatisfactory Performance Procedure is not successful, the Fund will:

- Add the Scheme employer to the Fund's Risk Register.
- Report the Scheme employer to tPR or Scheme Advisory Board.
- Escalate the situation to the ERPB/Pensions Committee.

When costs associated with Scheme employer's poor performance may be levied

Regulation 70 of the Local Government Pension Scheme 2013 Regulations provide that an administering authority may recover from a Scheme employer, any additional costs associated with the administration of the Scheme incurred because of any unsatisfactory level of performance of that Scheme employer. Whilst the Fund will only consider this as a last resort there may be some instances where a charge is applied, for example:

- In circumstances where the performance of the Scheme employer results in fines being levied on the Fund by tPR, Pensions Ombudsman or other regulatory body, an amount up to the amount of that fine will be recharged to that Scheme employer. In addition, there will be an additional charge equal to any associated legal, actuarial, and administrative costs the Fund has incurred as a result of the Scheme employer's action or failure.
- Scheme employers who enter Level 3 and 4 of the Scheme Employer Unsatisfactory Performance Procedure will have the costs of increased administration recovered from them in line with the charging structure detailed in the Scheme Employer Unsatisfactory Performance Procedure contained in Appendix 1.

Appendices

Appendix 1 - Scheme Employer Unsatisfactory Performance Procedure

Appendix 1 - Scheme Employer Unsatisfactory Performance procedure

Where a Scheme employer fails to meet the required performance levels the Fund will commence action under the Scheme Employer Unsatisfactory Performance Procedure.

Performance trigger	Action
Level 1	
<p>Scheme employer has not met up to three administration targets for a period of 1 month, but performance is otherwise satisfactory.</p> <ul style="list-style-type: none"> One late payment (deemed to not be of material significance* by the Fund) in the financial year, but performance is otherwise satisfactory. One Monthly Data Collection (MDC) submission or Year-end return not received within agreed timetable. 	<p>The Fund will contact the Scheme employer to find out any issues or if they need any support or guidance.</p>
Level 2	
<p>Scheme employer has not met more than three administration targets for a period of 1 month or more.</p> <ul style="list-style-type: none"> More than one late payment (deemed to not be of material significance* by the Fund) in the financial year. More than one Monthly Data Collection (MDC) submission outstanding or Year-end return not received by the last working day in May following discussion with ERPF. 	<p>The Fund will contact the Scheme employer to discuss the reason for the unsatisfactory performance and an informal improvement plan will be put in place with a suitable deadline for review.</p> <p>Letter sent to confirm agreement with the Scheme employer and the next steps of:</p> <ul style="list-style-type: none"> Improvement notice Administration charge; and Interest for late payment if applicable.
Level 3	
Administration charges in line with the Scheme Employer Performance Levels table will be applied	
<p>Informal discussions and action plan have been unsuccessful in resolving the unsatisfactory performance.</p>	<p>Where an informal improvement plan has failed to improve the Scheme employer's performance to a satisfactory level, the Fund will invite the Scheme employer to attend a formal improvement meeting.</p> <p>A further plan of improvement will be put in place with the Scheme employer. The details of this agreement will be sent as a mandatory improvement notice.</p> <p>Where a Scheme employer declines to discuss performance issues, a mandatory improvement notice will be sent and an administration charge will be made.</p> <p>Interest on late payments will be charged.</p>

Level 4**Administration charges in line with the Scheme Employer Performance Levels table will be applied**

<ul style="list-style-type: none"> • Where a mandatory improvement notice has been unsuccessful in improving Scheme employer performance. • Late payments deemed to be of material significance* by the Fund. 	<p>The Fund will add the Scheme employer to the Pension Fund Risk Register and will report the Scheme employer The Pensions Regulator (tPR).</p> <p>East Riding Pension Board (ERPB) and the Pensions Committee will be made aware of any unsatisfactory performing Scheme employers.</p> <p>The Fund will continue to support and work with the Scheme employer to resolve any performance issues. An administrative charge will be made for all additional work due to unsatisfactory performance.</p> <p>The Fund may also write to affected Scheme members to inform them that they are unable to calculate the members benefits due to outstanding information for the Scheme employer.</p>
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* Material significance will be determined by the Fund using the guidelines set out by the Pensions Regulator in force at the time.

Scheme Employer Performance Levels

The table below details the timescales for Scheme employers providing information and notifications to the Fund. The Scheme regulation provide the Fund with the ability to recover from a Scheme employer any additional costs associated with the administration of the scheme incurred as a poor level of performance of that employer. Interest for late payment may be added at 1% above the bank base rate to the costs above if not paid within one month

Scheme Employer Performance Levels			
Event for notification	Timescale for submission	Performance target	Additional Administration Costs to be recovered
A new scheme joiner	Within 6 weeks of the employee joining or the 15 th of the following month if MDC	90% of new starter forms received	£25 per member record
A change in the scheme section (50/50 or main)	Within 6 weeks of the change or the 15 th of the following month if MDC	90% of change of Scheme elections notified	£25 per member record
Scheme leaver without a right to immediate payment of benefits (including opting out of the Scheme)	Within 6 weeks of leaving the scheme or the 15 th of the following month if MDC	90% of notifications received	£25 per member record

Scheme leaver with a right to immediate payment of benefits	Within 2 weeks of leaving the scheme	90% of Web Leaver Forms received	£25 per member record
A member's intention to retire	Within 2 weeks prior to intended retirement date	100% of Notification of Retirement forms received	£25 member record
The death of a member	Within 2 weeks of the date of death or date of notification if later	100% of notifications received	£25 per member record
Changes to working pattern including contractual hours	Within 6 weeks of the change or the 15 th of the following month if MDC	90% of work pattern changes notified	£25 per change
Changes to an active member's name, address or other personal details	Within 6 weeks of the change or the 15 th of the following month if MDC	95% of updates notified	£25 per member
A period of authorised absence commences or ends (including child related absence and unpaid leave)	Within 6 weeks of the date absence commencing or the date of absence ending	90% of absences notified	£25 per absence
MDC Queries; Year End Queries; Leaver Queries; General Member Queries	Response submitted within 10 working days	90% of submissions received	£25 per query
Monthly Data Collection submission (membership is determined by the number of active members the Fund holds including unprocessed leavers)	Received by the 15 th day of the month following the month in which events occurred	100% of submissions received	Less than 15 members: £50 per day per employer
			15-500 members: £150 per day per Scheme employer
			>500 members: £500 per day per Scheme employer 100 per Scheme employer
Year-end submission (membership is determined by the number of active members the Fund holds including unprocessed leavers)	Received by the date set by the Fund for each of the Scheme years (31 March)	100% received within timescales for submission	Less than 15 members: £50 per day per employer
			15-500 members: £150 per day per Scheme employer
			>500 members: £500 per day per Scheme employer 100 per Scheme employer

Payment of contributions to the Fund to be submitted with a member breakdown	Received by the 19 th day of the month following the month in which events occurred	100% received within timescales for submission	£100 plus interest
Failure to make a policy on Scheme employer discretions	As soon as join the Scheme and reviewed annually	Current Discretions Policy is in place with the Fund	£150 per Scheme employer