

Staff & Pensions Committee

Date: Monday, 8 June 2020
Time: 2.00 pm
Venue: Virtual Meeting

Membership

Councillor Kam Kaur (Chair)
Councillor Neil Dirveiks
Councillor Bill Gifford
Councillor John Horner
Councillor Bhagwant Singh Pandher
Councillor Bob Stevens

Items on the agenda: -

1. General

(1) Apologies

(2) Members' Disclosures of Pecuniary and Non-Pecuniary Interests

Members are required to register their disclosable pecuniary interests within 28 days of their election of appointment to the Council. A member attending a meeting where a matter arises in which s/he has a disclosable pecuniary interest must (unless s/he has a dispensation):

- Declare the interest if s/he has not already registered it
- Not participate in any discussion or vote
- Must leave the meeting room until the matter has been dealt with.
- Give written notice of any unregistered interest to the Monitoring Officer within 28 days of the meeting

Non-pecuniary interests must still be declared in accordance with the Code of Conduct. These should be declared at the commencement of the meeting.

(3) Minutes of previous meeting

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2. Covid-19 Administration Impact and Actions

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3. Armed Services Support and Foster Friendly Employer	21 - 32
4. WFRS Health, Safety and Wellbeing Annual Report	33 - 50
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8. Administration Strategy	105 - 132

Monica Fogarty
Chief Executive
Warwickshire County Council
Shire Hall, Warwick

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Disclosures of Pecuniary and Non-Pecuniary Interests

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The public reports referred to are available on the Warwickshire Web

<https://democracy.warwickshire.gov.uk/uuCoverPage.aspx?bcr=1>

Public Speaking

Any member of the public who is resident or working in Warwickshire, or who is in receipt of services from the Council, may speak at the meeting for up to three minutes on any matter within the remit of the Committee. This can be in the form of a statement or a question. If you wish to speak please notify Democratic Services in writing at least two working days before the meeting. You should give your name and address and the subject upon which you wish to speak. Full details of the public speaking scheme are set out in the Council's Standing Orders.

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Staff & Pensions Committee

Thursday, 12 March 2020

Minutes

Attendance

Committee Members

Councillor Kam Kaur (Chair)
Councillor Bill Gifford
Councillor Bhagwant Singh Pandher
Councillor Bob Stevens

Officers

Neil Buxton (Technical Specialist Pensions Fund Policy and Governance)
Liz Firmstone (Service Manager (Transformation))
Sarah McCluskey (HR Business Partner)
Isabelle Moorhouse (Trainee Democratic Services Officer)
Chris Norton (Strategy and Commissioning Manager (Treasury, Pension, Audit & Risk))
Keira Rounsley (Equality, Diversity and Inclusion Practitioner)
Nichola Vine (Strategy and Commissioning Manager (Legal and Democratic))

1. General

(1) Apologies

Apologies were received from Councillors Neil Dirveiks and John Horner

(2) Members' Disclosures of Pecuniary and Non-Pecuniary Interests

None

(3) Minutes of previous meeting

The minutes of the meeting held on 9 December 2019 were considered and agreed as a true and accurate record for signing by the Chair.

2. Equality, Diversity and Inclusion Developments

Keira Rounsley (Equality, Diversity and Inclusion Practitioner) introduced the report. She stated that it shows the core developments in equality, diversity and inclusion and added that the members have seen the annual workforce and gender pay gap report. Keira Rounsley continued that the proactive approach should have a positive impact on these statistics moving forward. She concluded that the report recommends the Council signs up for the West Midlands Inclusive

Leadership Pledge and the Council adopts the International Holocaust Remembrance Alliance (IHRA) definition of antisemitism.

Councillor Bill Gifford raised that prior to the meeting, he circulated an email to the committee members and Keira Rounsley as the report author regarding the IHRA definition of antisemitism. He suggested adopting the definition but add the following wording:

1. It is not Anti-Semitic to criticise the Government of Israel, without additional evidence to suggest Anti-Semitic intent.
2. It is not Anti-Semitic to hold the Israeli Government to the same standards as other liberal democracies, or to take a particular interest in the Israeli Government's policies or actions, without additional evidence to suggest Anti-Semitic intent

Councillor Gifford endorsed adding this addition, so freedom of speech is not infringed. He continued that members of the Jewish community developed this wording after it was established in the House of Commons. Councillor Gifford raised that Warwick District Council have adapted this wording. The Chair thanked Councillor Gifford for sharing these points.

The Chair stated that she attended a conference recently where anti-Semitism was discussed; it was recognised that it was a serious issue and attendees were sympathetic. The Chair raised that she did not know why this extra wording needed to be added as equality, diversity and inclusion should include all races, religions and gender.

In response to the Chair, Councillor Gifford reiterated that he does not want Warwickshire County Council staff to feel disciplined when speaking against the Israeli government with no anti-Semitic intent. He concluded that staff should feel free to criticise any government and adopting this extra wording distinguishes the difference between being anti-Semitic and anti-Israeli government.

Nichola Vine (Strategy and Commissioning Manager (Legal and Democratic)) informed the committee that legally this amendment would need to be seconded by another committee member in order to be voted on by as an amendment. She added that external decisions have considered the final point in the IHRA working definition to be sufficient in its wording to protect free speech. Nichola Vince concluded that Councillor Gifford can vote against the report recommendations.

There was no seconder to Councillor Gifford's amendment.

The Chair expressed the importance of looking at the issue in a holistic way; however, she understands why the motion was raised. The Chair concluded that this report is for all staff members and they are not looking for someone to be more protected than another regarding freedom of speech.

Resolved:

That the Staff and Pensions Committee:

1. Notes and comments on the developments in Equality, Diversity and Inclusion (EDI) across the Council.
2. Supports the Council signing up to the West Midlands Combined Authority Inclusive Leadership Pledge.

3. That the Committee approves the Councils formal adoption of the International Holocaust Remembrance Alliance (*IHRA*) definition of antisemitism and applies it on all appropriate occasions.

3. Staff Benefits

Sarah McCluskey (HR Business Partner) presented the report outlines. She stated that the current staff benefits contract has been in place since 2015 and is up for renewal in June 2020. Sarah McCluskey continued that the purpose of the report is to propose the way forward for staff benefits and seek member endorsement. There are currently several schemes in place, including: childcare vouchers, cycling to work and online discounts; they are looking at increasing these schemes for staff. Benefits that are being investigated are buying leave, a green car scheme, shared-cost local government pension scheme, a financial wellbeing scheme and a travel to work season ticket.

Sarah McCluskey informed the committee that each scheme can be complex, so they are seeking external advice with pensions and HMRC (HM Revenue and Customs) as well as colleagues from finance and legal. When these consultations have concluded they will look at which schemes to implement and when.

The report sets out the savings achieved with the current schemes since September 2015; the childcare voucher scheme saved staff members over £2 million and employees have saved £43,000 with the cycle to work scheme. The committee was informed that the 'salary sacrifice scheme' benefits employees as they do not pay NI or PAYE tax.

There would be positive environmental implications if the green car scheme is approved as it would encourage driving low emission cars.

It was clarified that there is a current scheme in place where there are 'pool cars' which staff members can use for council business. It is more beneficial for the Council, if pool cars are used by staff members for long journeys, rather than driving their own cars and claiming millage expenses. The committee was informed that all mileage claims need to be approved by a line manager and these claims must follow the policies in place regarding pool cars.

Councillor Gifford reiterated that the Council should be pushing for staff to utilise the low emission pool cars. He asked for the figures of staff members utilising the pool cars for journeys over 100 miles in comparison to staff who claim millage for their personal cars. In response to the Chair, Sarah McCluskey agreed to see if this data was available and share it will the committee if possible.

Councillor Bob Stevens raised that charging points would need to be installed as an incentive for using electric cars; he added that all future pool cars should be electric following the climate emergency declaration. Councillor Stevens and Councillor Gifford concurred that now is the opportunity for the incentive for staff members to use the pool cars over their own cars.

In response to Councillor Gifford, the Chair stated that electric cars are expensive, and the Council cannot dictate which car staff use despite the environmental and financial incentives with the pool cars.

It was agreed that if Sarah McCluskey cannot obtain the relevant information regarding the pool car usage, the committee will investigate ensuring staff utilise these pool cars when possible. Councillor Stevens concluded that the green car scheme demonstrates that Warwickshire County Council is acting on climate change.

Resolved:

That the Staff and Pensions committee:

1. Continues to endorse the existing staff benefits provision of childcare vouchers, cycle to work scheme and the on-line discounts/offers portal, subject to each salary sacrifice scheme being cost effective for the Council by delivering financial benefits.
2. Endorses extending the number of staff benefits schemes on offer to employees as summarised at 2.3 and Appendix 1, to achieve the outcomes set out in the report.
3. Authorises the Strategic Director for Resources to determine the scope and parameters of the staff benefits scheme and its implementation following appointment of the new provider, and to extend the scheme should new benefits be offered which are considered by him to support Our People Strategy.
4. That the Strategic Director for Resources is authorised to amend the Council's Discretionary Pension Policy statement to enable delivery of the shared cost LGPS pension AVC's, if required.
5. Sarah McCluskey to circulate figures of staff members who are utilising the pool cars for journeys over 100 miles in comparison to those who claim millage for these journeys in their personal cars.

4. Conflicts of Interest Policy

Chris Norton (Strategy and Commissioning Manager (Treasury, Pension, Audit & Risk) presented the report. Governance of the Pension Fund had been investigated for the past year to make sure they are up to date. They are currently ensuring that all the policies that are required for the pension management fund are going through a 'revolving door of review'. The report so far has just been reviewed by the Local Pension Board who made no comments. Chris Norton concluded that Staff and Pensions approve and enforce the policy. It was added that there is the issue of ensuring conflicts of interest are covered for the pension scheme, which would encompass the other pension committees.

Councillor Stevens stated that conflicts of interests are an advisory guide for members and their actions in meetings. Councillor Gifford added that they are more relevant for advisors then for members, but it is important that conflicts of interest are transparent.

Resolved:

That the Staff and Pensions Committee review and approve the attached Conflicts of Interest Policy.

5. Pensions Administration Activity and Performance Update

Liz Firmstone (Service Manager (Transformation)) explained the key elements of the report. She stated that they had already undertaken some 'scene setting' with Staff and Pensions committee to ensure the right things were being reported to the right place. The committee was informed that the report will be the first of regular reports to the committee, showing the key work being undertaken within the Pensions Administration Team.

Liz Firmstone continued that 89% of the annual benefit statements have been issued, the shortfall has been reported to the Pensions Regulator as a breach but there is a process in place to resolve this. The remaining 11% could not be issued primarily due to the Pensions Administration service not holding the current addresses for these members but they are engaging with a tracing agency in line with best industry practice. She stated that an independent consultant was brought in to review the Pension Fund governance arrangements. Following this, a comprehensive action plan has been established following the recommendations from the recent audit reports. The committee was informed that half of these actions have been completed and good progress is being made; time activity and actions with the greatest impact on governance compliance requirement impacts are being prioritised to ensure requirements are met.

Liz Firmstone stated that the performance indicators are now being reported on and they are looking to refine these in line with best practice for the financial year. Performance against some targets is low due to the number of staff vacancies in the team at the start of the year, but these have now been filled and performance is expected to improve. Liz Firmstone continued that the format is likely to change in the next financial year to ensure best performance reporting. In February several key performance indicators were on target. Liz Firmstone concluded that there had been two difficult employer issues with delayed contributions, but this is being resolved.

The Committee agreed that it was a good report. It was clarified that the Local Pension Board actively engaged in this report when it was received by them.

Resolved:

That the Staff and Pensions Committee note and comment on the latest developments in pensions administration and note the progress made since the last meeting.

6. Regulatory Update

Neil Buxton (Technical Specialist Pensions Fund Policy and Governance) summarised the report. He stated the only updates are regarding the McCloud and Firefighter's Pension Scheme (FBS). A complaint was upheld by the Employment Tribunal in December 2019 which ruled that the changes made to the FPS in 2015 discriminated members because of their age and they should be put back into the old scheme. Neil Buxton concluded that they are waiting for guidance from the Home Office and Local Government Association regarding this.

In response to Councillor Stevens, Neil Buxton stated they are not sure what the resolution will be with regards to the firefighters; they could remain in the old scheme and this could be defined as, when that person retires and how cost effective it is. He added that there have got to be the adjustments to the contributions that the employer and employee made. Neil Buxton continued that

the Local Government Pension Scheme cost is interminable, and this has been reflected in the evaluations with contingencies put in place.

Chris Norton added that the complexity of the scheme was observed over the years regarding the care scheme and McCloud. He concluded that McCloud has the potential to be another layer of complication and when things stack up, the scheme gets more difficult.

Resolved:

That the Staff and Pensions Committee note and comment on the report.

7. Administration Strategy

Chris Norton summarised that the Administration Strategy attempts to provide a deviation of roles and responsibilities between the Warwickshire Pension Fund's role and what employers must do. There are approximately 50,000 members and 200 employers in the fund; all the employers submit data and pay regular contributions to the fund. Extra requirements have been implemented around options for fining and charging interest; the fund will provide information on what is required, the format process, provide support and training and run annual seminars. The Council will be responsible for making sure the data is accurate, but employers are responsible for carrying this work out.

There is an emphasis on financial charges in the strategy as the Council cannot afford to force an employer to pay the required contributions into the fund. Chris Norton continued that meeting the regulatory requirements is the Council's responsibility. The pensions regulator cannot touch employees, but they can hold the Pension Fund to account; therefore, the Council must be ready to state what they did if contributions were not received from an employer. Chris Norton raised that they do not intend to use these extra fine levers all the time.

He concluded that this report went to the Local Pension Board for comment and after the Staff and Pensions meeting, there will be an external consultation before returning to the committee for sign off and enforcement.

In response to Councillor Gifford, Chris Norton stated that if one person and a big business were both in the scheme, they would not be dealt in the same way. Therefore, the emphases on employer fines was noted, as big businesses would know if they are in the wrong with pensions schemes.

In response to the Chair, Chris Norton clarified it will be enforced following June's Staff and Pensions meeting, if approved.

Resolved:

That the Staff and Pensions Committee approve the Administration Strategy.

8. Pension Fund Admissions - Academies

Neil Buxton informed the committee of the schools' applications to become academy trusts, if the schools are not converted by June then they must resubmit their application. He added that

Heartwood CofE MAT is being transferred to the Birmingham Diocese; therefore, any liabilities will be transferred to them at no risk to the Pension Board.

The committee was informed that as it is still a Warwickshire school it will still be administered by the Pension Board.

Resolved:

That the Staff and Pensions Committee delegates authority to the Strategic Director for Resources to approve applications from schools converting to academy status, subject to the applications meeting the criteria:

Kingsway Primary School (Community Academy Trust; 1 April 2020)

Lillington Primary School (Finham Park MAT; 1 April 2020)

Wootton Waven Primary School (Arden Forest MAT; 1 April 2020)

Henley Primary Academy (Arden Forest MAT; 1 April 2020)

9. Community Academy Trust Administration Centre

Neil Buxton summarised that the Community Academy Trust Administration Centre is currently in Warwickshire but is moving to Staffordshire. Therefore, they should transfer to Staffordshire's Pension Fund, however, they applied to the Secretary of State to remain in Warwickshire's Pension Fund and this was approved.

It was reiterated that Staffordshire agreed to this arrangement too.

Resolved:

That the Staff and Pensions Committee note the Direction issued by the Secretary of State for Housing, Communities and Local Government (HCLG) for the Community Academy Trust's Administration Centre to remain part of the Warwickshire Pension Fund although it has relocated to Staffordshire.

10. Barnardo's Children's and Family Centres

Neil Buxton stated that the report informs the committee of the closures of the children's centres; these are being replaced by children and family centres. This has been through the Pension Fund and only the administration function remains to be processed.

The Committee was informed that Barnardo's now have their own pension scheme for new employees, but old employees will remain in the Warwickshire Pension Fund.

Resolved:

That the Staff and Pensions Committee notes the cessation of Barnardo's as a Scheme Employer in respect of the Children Centres contracts and approves the admission of Barnardo's as a Scheme Employer (the Applicant Body) in respect of the Family Centre contract.

11. Next Meeting

The next meeting of the Committee will be held at 2pm 8 June 2020 in committee room 1.

The meeting rose at 14:53

Staff and Pensions Committee**8th June 2020****COVID-19 – Pension Fund Administration Impact and Actions****Recommendations**

1. That the Staff and Pensions Committee notes and comments on the report.

1 Executive Summary

1.1 COVID-19 is impacting across many aspects of the fund's operations. This report focuses on the impact on administration activity. A separate report focusing on the funding and investments impact will be reported to the Pension Fund Investments Sub Committee.

Business As Usual Activity

1.2 The administration function has transitioned to large scale home working, but this has required considerable effort and has inevitably caused some disruption. From day 1 of the lockdown, the leadership team met regularly to ensure the prioritisation of payment processing for retirements and death cases.

1.3 Close contact has been maintained with payments and payroll teams to ensure payments are made as normal. Disruption has been kept to a minimum and attention has moved on to the processing of other administration tasks.

Staffing & Operations

1.4 A key focus has been to consider and look after the welfare of the administration team as they transition from office to home-based working. All the team can work from home, having all the necessary IT equipment. Some challenges were encountered in respect of systems access and performance but were resolved. The need for anyone to attend the office physically has been minimised.

1.5 Recruitment activity to deliver the new structure and expanded team size has continued with some new permanent members of staff joining the team and settling in well, working through induction and learning their role.

1.6 The administration team are keeping in touch by having regular video calls at team and individual level, and the health and wellbeing of the team is being monitored. Staff welfare is a priority, both in terms of minimising exposure to transmission risk and the risk of feeling isolated as the intensity and novelty

of the transition subsides and remote working normalises.

- 1.7 Work on the implementation of system improvements continues. The business case for the implementation of the iConnect system has been progressed further.
- 1.8 The general direction of travel is for processes that work electronically. Over time there will be a move to correspondence being sent and received through secure email, reducing the volume of print and post needed.
- 1.9 Immediate changes were made to redirect office phone calls to mobiles, and up to date information and guidance was published in our email response and on the Fund website.
- 1.10 Some issues have been experienced in respect of the operation of systems and procedures, but these have been resolved.

2 COVID-19 Risk Assessment

- 2.1 A COVID-19 risk assessment has been undertaken in 2 stages.

First an assessment of the existing strategic risks and how the COVID-19 issue impacts on each of these. This is summarised below

Ref	Risk	Original March 2020 Assessment		Update as at May 2020 In Comparison to the Original Risk Assessment
		Risk Level Before Mitigations	Risk Level After Mitigations	
1	Long term returns fail to be in line with assumptions	6	3	Significantly higher risk
2	Short term falls in asset values	6	4	Significantly higher risk
3	Cashflow requirements cannot be met	12	6	Higher Risk
4	Poor performance of actively managed funds	6	4	No change
5	Failure to realise pooling benefits	6	4	No change
6	Fraud	6	3	Higher Risk
7	Liabilities increase further than assumptions	6	2	No change
8	Inadequate data quality	16	9	No change
9	Employer contributions not being paid	12	9	Significantly higher risk
10	Fund reputation is harmed	9	6	No change
11	Loss of service provision due to disruption	4	3	Higher Risk
12	Lack of skills and knowledge	9	4	No change
13	Failure to meet governance standards	12	8	No change

- Secondly to identify specific COVID-19 risks and analyse these directly. This is summarised in the table below and detailed in Appendix 1.

Ref	Risk	Gross Risk		Risk Level	Net Risk after Mitigations		Risk Level
		Likelihood	Impact		Likelihood	Impact	
1	Cashflow - Delayed Employer Contributions	3	4	12	3	4	12
2	Cashflow - Investments Impact	4	4	16	4	3	12
3	Losses in Investment Values and Returns	4	4	16	4	3	12
4	Governance Disruption	3	4	12	3	3	9
5	Health and Safety of Members	3	4	12	2	3	6
6	Health and Safety of Staff	4	4	16	3	3	9
7	Loss of continuity working with advisers, partners, fund managers, and Border to Coast	3	3	9	3	2	6
8	Administration Service Disruption	4	4	16	3	3	9
9	Inability to Recover	3	3	9	2	3	6

2.2 The notes below focus on administration related issues and actions:

- A systematic approach to dealing with employer cashflow issues is being considered. At the time of writing there have not been a significant number of problems presented by employers, but the first employer contributions of 2020/21 are not yet due. Mitigating actions will reduce the risk but the risk remains high and the scoring scale of 1-4 does not offer enough granularity to reflect the impact;
- In respect of urgent decision-making arrangements, there are currently no decisions required of an urgent nature, existing administration policies have been adequate to cover the issues experienced to date;
- A process to appoint to the vacant Pensions Administration Delivery Lead post continues and at the time of writing had reached the stage of an offer of appointment has been made;
- Staff in the pension fund and wider Council are sharing best practice on how to work effectively from home; and
- The fund's officers continue to liaise with external advisers and entities, including employer payroll functions where appropriate.

3 Financial Implications

- 3.1 The key potential administration related financial implication is in respect of the collection of employer contributions. A number of mitigating actions are in place to mitigate this as set out in Risk 1 in the Risk Register in Appendix 1.

4 Environmental Implications

- 4.1 There will be reductions in CO2 emissions from staff working from home.

5 Supporting Information

- 5.1 The risk register scores set out above are based on the following convention:

- Gross risk – risk before mitigating actions
- Net risk – risk after mitigating actions

- 5.2 Risk probability and impact are classified into 4 categories as follows:

		Likelihood			
		Unlikely 1	Possible 2	Likely 3	Very Likely 4
Impact	Very High 4	4	8	12	16
	High 3	3	6	9	12
	Medium 2	2	4	6	8
	Low 4	1	2	3	4

- 5.3 Risk impact and likelihood are multiplied together to provide an overall risk score. Red risks are those with scores of 10 or higher, green risks have scores of 3 or lower, and the remainder are amber.

6 Timescales and Next Steps

- 6.1 The additional COVID-19 risks have been separated out in this initial assessment to provide clarity of their overall impact. However, from Quarter 2 the intention is to have subsumed COVID-19 related risks and actions into a single updated Pension Fund risk register.

Appendices

Appendix 1 – COVID-19 Risk Register

Background Papers

None.

	Name	Contact Information
Report Author	Chris Norton	chrisnorton@warwickshire.gov.uk
Assistant Director	Andrew Felton	andrewfelton@.warwickshire.gov.uk
Lead Director	Strategic Director for Resources	robpowell@warwickshire.gov.uk
Lead Member	Portfolio Holder for Finance and Property	peterbutlin@warwickshire.gov.uk

The report was circulated to the following members prior to publication:

Local Member(s): None

Other members: Councillors Kam Kaur, Bill Gifford, Bob Stevens, Neil Dirveiks, John Horner and Bhagwant Singh Pandher

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Ref	Risk	Cause	Effect	Gross Risk		Risk Level	Existing Actions(in place or completed)	NET Risk		Risk Level	Further Risk Actions
				Likelihood	Impact			Likelihood	Impact		Description
1	Cashflow - Delayed Employer Contributions	Employers choose to delay contributions to protect their cash position. Employers cannot pay their contributions because of business continuity failure, for example systems do not work remotely, or key staff off sick. Government directives to pension funds to support employer cashflow	Negative impact on fund cashflow Fund may need to sell assets in unfavourable circumstances in order to service cashflow needs Asset weightings may move significantly out of balance, changing the risks the Fund is exposed to	3	4	12	Investments and cash reserves available to cover a period of delays in contributions	3	4	12	Review employer base and mitigating approaches for different employer types, prioritising employers and employer groups with weak covenants or that are more heavily impacted by covid Review securities and guarantees from employer, and guarantor arrangements Consider longer term maximisation of contributions not short term maximisation Review options to reduce or delay contributions in certain circumstances Engage with employers on options and to understand their plans and position Ensure cashflow management is prioritised
2	Cashflow - Investments Impact	Significant losses in asset values Companies choosing to stop issuing dividends to protect the company cash position Government directing companies to stop paying dividends to protect company viability Reduction in yields from income generating assets as safer assets are more in demand Gating of funds at risk of mass withdrawals	Refer to Risk 1	4	4	16	Cash reserves available to cover a period of time Focus on cashflow initially Building cash balances Other related actions as per Risk 3	4	3	12	Review investments position once cashflow position is understood and cashflow is secured
3	Losses in Investment Values and Returns	Economic shock / slowdown Volatility in financial markets Losses in economic supply and demand and productivity / GDP globally	Funding level worsens materially Investment weightings move outside of tolerance levels Current Investment Strategy is no longer suitable Fire sale of assets	4	4	16	Maintain close liaison with Investment Consultant, Fund Managers, and Border to Coast Maintain existing strategy and asset classes unless there are very good reasons for deviating. Cashflow strategy recently reviewed	4	3	12	Look to set up fast track governance of decision making should quick decisions need to be made - see Risk 4 Prioritisation of cashflow management in the immediate term
4	Governance Disruption	Loss of existing means of governance meetings Lack of appropriate remote working hardware or software The potential need to make significant decisions very quickly	Inability to make significant decisions quickly enough - losing money or opportunities in the process Decisions being made without adequate oversight and governance Sub optimal decisions being made	3	4	12	Issue remotely of joint briefing notes to the two pension committees and the local pension board to maintain communications and transparency/assurance around pension fund activity and the response to the Covid issue Signing/authority of decisions and transactions remotely using Surface Pro tablets instead of physical wet signatures on paper where this is possible	3	3	9	Engage with committees and boards to understand priorities Review of arrangements to be able to run boards and committees remotely Review of options to delegate decision making to facilitate quick decisions where necessary (e.g. to s151 or to an emergency response group, etc) Consider relaxing quorum requirements Review and rephase project work Continue the implementation of governance review actions but review prioritisation where necessary

Ref	Risk	Cause	Effect	Gross Risk		Risk Level	Existing Actions(in place or completed)	NET Risk		Risk Level	Further Risk Actions
				Likelihood	Impact			Likelihood	Impact		Description
5	Health and Safety of Members	Inability to pay pensions to pensioners Paper based systems Lack of informaiton available to members about the impact on their pension	Pensioners not able to buy essentials if pensions are not paid Paper based systems causing infection transmission risk Mentail health risk if members are worrying about pensions	3	4	12	Post updates on website regarding pension payments Administration actions in Risk 8	2	3	6	Review and update any communications and documentation for members Administration actions in Risk 8
6	Health and Safety of Staff	Lack of adequate remote working facilities Paper based systems Pressure to deliver business as usual whilst dealing with the crisis Lack of contact wilh colleagues	Paper based systems causing infection transmission risk Mental health impact Delivery of key priorities	4	4	16	Mandatory working from home unless exceptional reason to go to office Microsoft 356, Surface Pros and ability to work from home Council flexible working policy Rapid capture and sharing of lessons learned about effective remote working	3	3	9	Share learning on working from home lessons
7	Loss of continuity working with advisers, partners, fund managers, and Border to Coast	Inability to operate remotely Loss of business continuity	Delays in investment operations Delays in fund launches Delays in closure of accounts	3	3	9	Liaison and meetings with external agencies have largely continued remotely, e.g. through Microsoft Teams and webex seminars Maintaining close liaison with key organisations, in particular Border to Coast, Hymans Robertson, and Bank of New York Mellon	3	2	6	Continue to engage with BCPP, fund managers, and custodian about their continuity plans Gather intelligence on market reactions
8	Administration Service Disruption	Lack of remote working facilities Staff lost to sickness Disruption to employer admin and payroll funcitons Disruption to systems and system suppliers Disruption to actuary service provision	Reduction in performance against KPIs that impact adversely on fund members and sustainability Incorrect or missing pensioner payments Data quality deterioration Delays to administration improvemetns e.g. iConnect	4	4	16	Remote working facilites have been set up with amost all work done from home Use of video conferencing Prepared to move resources around the team to protect the payment of pensions now	3	3	9	Review priorities for KPIs and ensure protection of those that support the most vulnerable Engage with key contacts to plan how we work Expediting the use of IT to replace paper pased systmes Review activities, procedures, signatories, etc. Cross train staff
9	Inability to Recover	Loss of continuity in staff Loss of systems Significant gaps in data or data quality develop during the crisis Significant backlogs in data submissions develop	Poor data quality for a significant period of time Significant costs to get data back to acceptable standards Inability to review and update investments for the new circumstances, and so missing opportunities	3	3	9	Regular review of the situation, instigating a recovery group when circumstances permit Keeping recovery in mind when taking actions during the crisis	2	3	6	

Staff and Pensions Committee

8 June 2020

Armed Services Support and Foster Friendly Employer

Recommendations

That the Staff and Pensions Committee: -

1. Approves that the Council will treat the contracts of employment of employees mobilised for Reserve Service as operable throughout the period of mobilisation so that there will be no adverse effect on entitlements calculated in accordance with length of service.
2. Approves the proposal for up to 5 days additional paid leave per annum (pro rata for part time staff) for employees who are approved foster carers in the years following approval as a foster carer for the purposes of undertaking learning, development or preparation for the placement of a child or young person.

1.0 Key Issues

Armed Services Support

- 1.1 At the 9 December 2019 meeting of the Staff and Pensions Committee the Committee approved various recommendations to improve the support for the Armed Services community within WCC. These included additional leave for employees serving in the Reserve Armed Forces or those volunteering their time as Adult Cadet Instructors for undertaking their annual camp or other training and introducing a Guaranteed Interview Scheme for external Armed Forces candidates. The agreed changes will enable the Council to deliver more effectively its role as lead agency for the Coventry, Solihull and Warwickshire Armed Forces Covenant and to apply for Gold standard under the MOD Defence Employer Recognition scheme.
- 1.2 Subsequent to receiving this approval HR&OD prepared a policy document - "Supporting Armed Forces in Employment". In doing so it highlighted that a decision needs to be taken about the continuity of service for reservist employees during a period of mobilisation.
- 1.3 Mobilisation is the process by which a Reservist is brought into full time service with the Regular Forces, in order to make them available for military operations. The maximum period of mobilisation depends on the scale and nature of the operation and is typically no longer than 12 months.

- 1.4 The statutory position under the Employment Rights Act 1996 is that mobilisation does not break continuity of employment provided that the employee follows stipulated notification procedures and returns to the Council within 6 months of the end of mobilisation. However, the period of mobilisation must be discounted when calculating the employee's total period of continuous employment. The impact of this for employees concerned is that any entitlements calculated in accordance with length of service such as annual leave, redundancy pay, and occupational sick leave and pay, would be adversely affected.
- 1.5 The MOD recommends that employers go beyond what is required under statute by treating the contract of employment as operable throughout the period of mobilisation with no loss of reckonable service, in order to support Reservists in employment.
- 1.6 Adopting the MOD's recommended approach would be in line with the Council's approach of supporting the armed forces community within WCC, and give parity between the treatment of mobilisation and other types of leave such as sick leave, maternity leave, paternity leave, shared parental leave and adoption leave, where the period of absence does count towards the employee's reckonable service.
- 1.7 Legal advice has confirmed that the Council is able to treat the contract of employment as operable throughout the period of mobilisation with no loss of reckonable service but that this requires Staff and Pensions Committee approval to this formal change in policy.
- 1.8 In April the MoD indicated that it was preparing to mobilise reservists to support the response to Covid 19. As an interim measure the Chief Executive's delegated powers were used to treat the contract of employment as operable during mobilisation with no loss of reckonable service of any military reservists mobilised as a result of Covid-19.
- 1.9 To formalise the arrangement, agreement is now sought from the Committee to continue to treat the contracts of employment of employees mobilised for Reserve Service as operable throughout the period of such service so that there will be no loss of continuous service.

Foster Friendly Employer

- 1.10 At the 9 December 2019 meeting of the Staff and Pensions Committee the Committee approved the various recommendations to support the Council in becoming a Foster Friendly employer and being recognised as such under the national award.
- 1.11 One recommendation to support this was that up to 5 days paid leave be available to employees in the first year of fostering and up to 3 days of paid leave each subsequent year. This leave is for the purposes of undertaking training to prepare for their assessment and ongoing learning and

development to support them as foster carers. Leave is pro rata'd for part time staff.

- 1.12 It has subsequently been determined that this leave provision does not meet the standards for the national award as the requirement is 5 days in the first year and 5 days in each subsequent year.
- 1.13 As a result, agreement is sought to increase the subsequent years leave allowance to 5 days per annum.
- 1.15 Leave will be at the discretion of the line manager subject to business need, with ultimate discretion by the Assistant Director to ensure that the needs of County Council's business are prioritised. Evidence of the fostering assessment process and approval will need to be provided by the employee to their manager on an annual basis.

2.0 Other considerations

- 2.1 The proposals in this report will support the Council's Our People strategy by:
 - enhancing our employer brand as an employer of choice
 - enabling us to attract and recruit from a broad talent pool, and by
 - furthering a diverse and highly engaged workforce that displays the organisation's values.

3.0 Financial Implications

- 3.1 The proposal in relation to reckonable service for Reservists will increase service-related entitlements for mobilised reservists. However, the impact is anticipated to be low. There are only 14 known employees who are either armed forces reservists or adult cadet force volunteers. In addition, mobilisation is typically no longer than 12 months, and as continuity of employment is only retained where the employee returns to the Council within six months of the end of mobilisation the maximum increase in reckonable service is likely to be no longer than 18 months.
- 3.3 In relation to additional leave for foster carers, the financial implication is also anticipated to be low. There are currently 3 WCC employees who are approved as foster carers. There will only be a direct cost to the additional leave provision where the nature of the role means that backfill cover needs to be arranged. It is expected that for most roles such cover will not be necessary, as the additional leave will effectively work in the same way as normal annual leave.
- 3.2 Any costs incurred are considered to be relatively modest compared with the benefits of the proposals outlined in this report. As noted above any leave is at the discretion of the manager and subject to business need, to ensure that the needs of the County Council's business are prioritised.

4.0 Environmental Implications

None

5.0 Timescales associated with the decision and next steps

5.1 Subject to approval by Staff and Pensions Committee next steps for both improving support for the Armed Forces community within WCC and/or becoming a Fostering Friendly Employer include: -

- Issuing the policy/guidance document for employees and managers.
- Apply for the national Foster Friendly employer award.
- Once achieved, promote the logo on the Council's job board in the recruitment process.

Background papers

The Supporting Armed Forces in Employment Policy is attached for information.

	Name	Contact Information
Report Author	Trish Kinsella	patriciakinsella@warwickshire.gov.uk
Assistant Director	Sarah Duxbury	sarahduxbury@warwickshire.gov.uk
Strategic Director	Rob Powell	robpowell@warwickshire.gov.uk
Portfolio Holder	Cllr Kam Kaur	kamkaur@warwickshire.gov.uk

The report was circulated to the following members prior to publication:

Other members: Councillor Kaur and Councillor Seccombe.

Warwickshire County Council

SUPPORTING ARMED FORCES IN EMPLOYMENT POLICY

Key points:

- Warwickshire County Council recognises and values the contribution that members of the Armed Forces community can make to its workforce, and signed the Armed Forces Covenant in 2012.
- Employees need to request the prior written permission of their line manager to be Volunteer Reservists/Adult Cadet Instructors.
- Subject to business need, the Council is committed to granting to Reservist employees or Adult Cadet Instructors:
 - Up to 10 days' paid leave per year for the annual camp or other training specific to their Reserve or Adult Cadet Instructor role; and
 - Up to 10 days' unpaid leave in total within a 3-year period, and each successive 3-year period thereafter, for additional specialist training to enhance their role or for progression within the Reserve or Cadet Forces.
- The Council will release employees for mobilisation in all but exceptional circumstances and will provide support before and after mobilisation to achieve a smooth reintegration to work.
- The Council will give an interview under its Guaranteed Interview Scheme (GIS) where the essential criteria for a post are met by external candidates who are:
 - Serving Armed Forces personnel during the 12 weeks prior to their discharge date from the Armed Forces;
 - Ex-Armed Forces personnel within 3 years of their discharge date; or
 - Where the Armed Forces were their last long-term employer.
- The Council offers 2-4-week unpaid work experience placements for those who are leaving the Armed Forces, and welcomes interest from those who are Wounded, Injured, or Sick (WIS).

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1 Introduction

- 1.1 Warwickshire County Council recognises and values the commitment made by members of the Armed Forces community. This policy sets out how the organisation supports the Armed Forces in employment.
- 1.2 The Council signed the [Armed Forces Covenant](#) in 2012 and is the lead agency for the Coventry, Solihull and Warwickshire Armed Forces Covenant (CSW AFC) partnership.

2 Scope

- 2.1 This policy applies to all employees of the Council with the exception of:
 - Fire and Rescue, who have their own Volunteer Reservists Force Service Order, and
 - Employees based in schools.

3 Reserve Status Notification

- 3.1 Employees are required to request the prior written permission of their line manager to be a Volunteer Reservist, in accordance with their terms and conditions of employment. Requests will be supported wherever possible and will not be unreasonably withheld or withdrawn unless, for example, it is deemed that it impacts or conflicts with employment with the Council. Employees must also inform their line manager in writing, at the earliest opportunity, if they leave the Reserve Forces. Employees who are Adult Cadet Instructors must inform their line manager of this role.
- 3.2 Reservist employees are also required to grant permission for the Ministry of Defence (MoD) to write directly to their employer to inform them that the employee is a member of the Reserve Forces and the obligations and rights that apply (known as ‘Employer notification’). The MoD will send a follow-up letter each year to confirm that the information held by the Council is still accurate. Official correspondence from the MoD is from a nominated representative with a UK Defence postal address or a @MOD.gov.uk email address suffix. All correspondence should be retained on the employee’s HR-ER record.

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3.3 If the Council has been notified (by the employee or the MoD) of an employee’s Reserve status, the Reservist employee will not be disadvantaged as a result of their Reserve status.

4 Time off for training

4.1 The Council recognises the importance of, and where possible will support, the training undertaken by Reservists and Adult Cadet Instructors, which enables them to develop skills and abilities that are of benefit to their respective Reserve Force, the individual, and the Council.

4.2 Reservists are typically committed to 24-40 days training per year. Training tends to take place one evening per week at the local centre, over various weekends throughout the year, and one 2-week training period (known as ‘annual camp’).

4.3 The Council is committed to granting: -

- Up to 10 days paid leave per annum (pro rata for employees who are part-time or employed part way through an annual leave year) for employees serving in the Reserve Armed Forces or those volunteering their time as Adult Cadet Instructors, for undertaking their annual camp or other training specific to their Reserve or Adult Cadet Instructor role.
- Up to 10 days additional unpaid leave in total (pro rata for employees who are part time, or employed part way through an annual leave year) within a 3 year period, and each successive 3 year period thereafter, for those serving in the Reserve Armed Forces or volunteering their time as Adult Cadet Instructors, for undertaking additional specialist training to enhance their role or for progression within the Reserve or Cadet Forces.

4.4 Leave requests must be submitted to the line manager via Your HR using the special category under ‘Other Absence’. Whilst requests will be met where possible, leave will be at the discretion of the line manager subject to business need, with ultimate discretion by the Assistant Director if the employee is not satisfied with the decision of their line manager. Permission, once given, will not be rescinded unless there are exceptional circumstances.

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- 4.5 Reservists/Adult Cadet Instructors must give as much notice as possible of training to allow appropriate absence planning and must provide evidence of training requirements. Leave must be used for training that falls on working days and cannot be used for days that the Reservist/Adult Cadet Instructor is not undertaking reservist activities (for example, to recover from the physical demands of a weekend away with the Reserve Forces). Employees who need time off for activities as reservists, beyond the leave referred to above, are expected to use normal annual leave entitlement.
- 4.6 Where unpaid leave is taken the employee may arrange to make up pension contributions for this period. – see [Additional Pension Contributions \(APCs\)](#) for how to do this for the Local Government Pension Scheme. Separate arrangements apply for the Teacher Pension Scheme.

5 Permanent Mobilisation

- 5.1 Mobilisation is the process by which a Reservist is brought into full time service with the Regular Forces, in order to make them available for military operations. The maximum period of mobilisation will depend on the scale and the nature of the operation and is typically no longer than 12 months.
- 5.2 The Council will support permanent mobilisation and release the employee for Reserve service in all but exceptional circumstances. When a call-up notice is issued, the Reservist is required by law to comply with it and the Council is legally obliged to release them for mobilisation. However, a call-out notice can be appealed if the Reservist’s absence is considered to cause serious harm to the business. A decision to make any such appeal will be made by the Strategic Director.
- 5.3 The call-out papers for mobilisation, with the call-out date and the anticipated timeline, are posted by the MoD to the employer, or may be delivered in person by the Reservist to their line manager. These also include the appeal process. The Reservist must inform their line manager in writing as soon as they receive a call-out.
- 5.4 Reservists will be supported by their line manager in preparing for mobilisation, and post-mobilisation to achieve a smooth re-integration into the

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workplace/team. Arrangements should be discussed and agreed for keeping in touch during the mobilisation period.

- 5.5 The Council does not pay the employee during mobilisation, the MoD assumes responsibility for this during the period of mobilisation. There is financial assistance available to an employer from the Ministry of Defence to cover, for example, agency fees to find a temporary replacement.
- 5.6 Regardless of the length of the Reservists' period of mobilisation, they are generally entitled to return once it has ended, subject to the Reservist meeting certain notification requirements. [This right applies for 6 months after the period of service.] Return should be, where possible, to the same job. If this is not possible, the Reservist should return to a mutually acceptable role on terms and conditions which are no less favourable than if the employee had not been called up.
- 5.7 The employee will be treated, for payroll purposes, as being on a period of special unpaid leave of absence during mobilisation. The Council will continue to treat the contracts of employment of employees mobilised for Reserve Service as operable throughout the period of such service and there will be no loss of continuous service.
- 5.8 Where possible, Reservists should be encouraged to take any accrued annual leave before mobilisation. Annual leave with the Council does not accrue during mobilisation because during this time the Reservist accrues it with the MoD, and this is factored into the mobilisation period.
- 5.9 If the Reservist is a pension scheme member and chooses to remain within it, the MoD will (subject to their rules and policies that may vary from time to time) make the employer contributions for the period of mobilisation, as long as the Reservist continues to make their personal contributions. Separate arrangements apply for the Teacher Pension Scheme (TPS).
- 5.10 As part of a mobilisation and deployment an individual may experience physical or mental health injuries, which may continue or become evident after their return to work. In these circumstances the Reservist may access healthcare from Defence Medical Services, the NHS or, via the line manager, the Council's occupational health provider. Further information is available on the [Support for Volunteer Reservists and their Families](#) page of the Council's Covenant web pages.

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- 5.11 More information on managing and supporting Reservists through mobilisation, including financial assistance to employers and return to work arrangements, is available at [MoD Reservist Employers' Toolkit](#)
- 5.12 The line manager can take advice from an HR Advisor where an employee is mobilised.

6 Recruitment – Guaranteed Interview Scheme (GIS)

6.1 The Council recognises the contribution that members of the Armed Forces community can make to its workforce and welcomes applications from ex-service personnel. As part of its Guaranteed Interview Scheme (GIS) the Council will give an interview where the essential criteria for a post are met by external candidates: -

- who are serving Armed Forces personnel during the 12 weeks prior to their discharge date from the Armed Forces,
- who are ex-Armed Forces personnel within 3 years of their discharge date or: -
- where the Armed Forces were their last long-term substantive employer

6.2 Evidence will need to be provided by the external candidate to the recruiting manager that they meet one of these GIS criteria, for example official notification from the senior officer such as a Commanding Officer. The GIS does not apply to internal candidates.

6.3 Disabled applicants, including those with an Armed Force background, who meet the essential criteria for an advertised vacancy, will be offered an interview as part of the Disability Confident Scheme.

7 Work placements

7.1 The Council offers 2-4-week unpaid work experience placements for those who are leaving the Armed Forces, and welcomes interest from those who are Wounded, Injured, Sick (WIS is a military category for those medically discharged from the Armed Forces). More information can be found [HERE](#)
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8 Other support available

8.1 The following support is also available to employees who are Reservists or Adult Cadet Instructors: -

- the Council operates a flexible working approach to allow employees to work in locations where they are most effective, at the most effective times, providing the potential, subject to business need, for greater freedom to plan around personal commitments – see [Flexible working](#)
- the Council considers requests for permanent changes to, for example, working hours or days. Most of these can be considered without the need to make a formal statutory request. Where this is not possible employees can make a formal request– see [Right to Request Flexible Working](#)
- Access to a confidential, 24 hour free-of-charge helpline under the Council’s [Employee Assistance Provider](#)
- Access to the Council’s [Occupational Health Provider](#) via the line manager for medical advice where appropriate
- Wellbeing support - see [Your Wellbeing](#)
- Information on the Council’s Covenant web pages – see [Support for Employee Reservists and their families](#)

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Staff and Pensions Committee**8 June 2020****Warwickshire Fire and Rescue Service****Health, Safety and Wellbeing Annual Report 2019 - 20****Recommendation**

That the Staff and Pensions Committee considers and comments on the report

1.0 Introduction

- 1.1 This is the annual Warwickshire Fire and Rescue Service (WFRS) Health, Safety and Wellbeing Report for the year ending March 2020. The report covers performance against several key Health, Safety and Wellbeing indicators and measures and identifies any emerging themes.
- 1.2 WFRS continues to have a dedicated Senior Health and Safety Advisor and Watch Manager (operational) to provide guidance, advice and support to all departments and managers; this reflects the unique and high risk activity of the Service. The competent advice, provided by the department ensures the service is legally compliant and that managers at all levels are aware of their corporate and individual responsibilities, along with any potential areas of vulnerability. WFRS work closely with their five regional fire partners to share learning and best practice to improve health, safety and wellbeing standards across the region. Warwickshire County Council as the Fire Authority has a statutory duty to ensure the health, safety and wellbeing of their employees so far as is reasonably practicable.
- 1.3 The main requirements which the Service must meet are set out in several complementary pieces of legislation and guidance which include: -
- 1.4 **The Fire & Rescue Services Act 2004**
The Act states that Fire Authorities must make provision for dealing with fires, road traffic accidents and other emergencies and identifies the need for adequately trained and equipped personnel.
- 1.5 **Fire and Rescue National Framework for England**
Reviewed in May 2018, this framework places a duty on Fire and Rescue Authorities to take into account the health, safety and wellbeing principles set out by the National Fire Chiefs Council. The framework identifies that Fire and Rescue Authorities have an important role in helping to ensure their firefighters remain fit and are supported in remaining in employment.
- 1.6 **The Health & Safety at Work Act 1974**

This applies to the Fire Authority as to any other employer, but it is more complex in its application to an emergency service.

In addition, there are multiple pieces of operational guidance which set out expected best practice which the Service must comply with or demonstrate good reason why it is not complying. These cover virtually every aspect of fire and rescue operations from firefighting and breathing apparatus operations through to water rescue, incident command and multi-agency response to terrorist incidents. This guidance includes:

1.7 National Operational Guidance (NOG)

NOG is continues to be an essential guide to the safe systems of work needed at an incident and is aimed at policy writers in each fire and rescue service, to support them in producing local guidance, policy and procedures. The guidance provides details of specific hazards and effective control measures, which will support a fire and rescue service to deliver an effective, assertive and safe incident command structure.

WFRS has established a small team, working in close co-operation with training staff, to adopt and incorporate NOG guidance into the service. This involves reviewing all our existing policies and, wherever possible, bringing the service into line with national guidance. At the end of 2019 a member of this team was appointed to a secondment to join the national NOG team, to provide an input and influence the national guidance content.

It is important to note that NOG applies equally to all fire and rescue services, ranging from the large metropolitans to smaller shires. Each service is required to assess how best and to what extent the national guidance can be applied locally with the resources available. Whilst WFRS always strives to align itself with national guidance this is not always possible; in such cases the WFRS NOG policy team will record the reasons for divergence and they will be agreed at an appropriate level within the service.

1.8 The Health and Safety Framework for the Operational Environment

This Framework which was produced by DCLG in June 2013 continues to assist Fire and Rescue Authorities in balancing risks, specifically in their wider role to protect the public and property, while meeting their health and safety at work duties to protect their staff and others. The Framework also focuses on the operational and training environments that are unique to firefighters and does not replace or replicate other health and safety guidance that applies to more routine activities.

1.9 The Operational Environment and the need for Realistic Training

It should be understood that, for the purposes of the legislation cited above, the incident ground is our “workplace” and we are responsible for the safety of our personnel and anybody else on the incident ground once we are on scene and in charge. It is also worth highlighting that any action taken in these circumstances

normally involves accepting a level of risk that would not be seen as “reasonable” in a normal workplace.

This combination of limited information and the expectation to act quickly in a dynamic, hazardous environment explains why the Service puts such emphasis on realistic operational training and the broader “safe person concept” promoted within a good health and safety culture.

WFRS are now developing a distributed training model. The planning application has been approved for the Kingsbury site. The building work required has gone out to tender, dates/timings for work to commence will be governed by the current lockdown. Once completed this will provide WFRS with a bespoke training facility and provided extensive training for:

- Breathing Apparatus
- Working at Height
- Water Rescue

In the interim the above training will be carried out at approved external venues.

2.0 Purpose and Scope of this Report

- 2.1 The purpose of this report is to provide Staff and Pensions with an annual position statement of the management and performance of Health, Safety and Wellbeing within WFRS. It summarises the key Health, Safety and Wellbeing (HSW) activities from 1st April 2019 to the 31st March 2020.
- 2.2 Please note this report does not include any information or data related to the rest of Warwickshire County Council (WCC).
- 2.3 In WFRS, the Health and Safety and Occupational Health functions are two separate departments each with their own manager. The overall management is provided by the Senior Health and Safety Advisor and the Occupational Health and Wellbeing Manger, who both report to the Area Manager responsible for Continuous Improvement and Change within WFRS.

3.0 Background

- 3.1 The information within the report relates to WFRS employees and activities for which we have statutory HSW responsibilities.

4.0 Health, Safety and Wellbeing Communication and Consultation

WFRS HSW information is presented and communicated routinely at the Health,

Safety and Wellbeing Committee Meeting held every 6 weeks. This statutory meeting is chaired by the Assistant Chief Fire Officer. Members of the recognised representative bodies (FBU, FOA, FRSA and UNISON) are invited to attend. This allows timely sharing and discussion of HSW related information and encourages early positive action to be taken in response to identified concerns by all parties.

4.1 Fee for Intervention (FFI)

Under the Health and Safety (Fees) Regulations 2012, those who break health and safety law are liable for the recovery of the HSE's related costs. The current fee is charged at £129.00 per hour if the HSE deem an employer to be in 'material breach' of Health and Safety legislation. To date, WFRS have not received any FFI charges.

4.2 National Fire and Rescue Service Significant Adverse Events

A Staffordshire FRS firefighter was left with "life-changing" injuries after an incident during a working at height rope training exercise at the end of September 2019. The HSE have been informed and a full independent investigation is being carried out by Derbyshire FRS.

On September 17th a firefighter from Mid and West Wales FRS died during a water rescue training exercise. They died when the boat he was on collided with another in the Cleddau Estuary in Pembrokeshire. A full investigation is being carried out by the Marine Accident Investigation Team. The latest update on this fatality is that Police are in the process of presenting their case to the CPS and looking to file for gross negligence and manslaughter to individuals and the corporate body.

As with all significant national adverse events WFRS will act on information, when it is made available.

4.3 Legislation Updates / Regulatory Interventions

The RIDDOR Regulations have recently been temporary amended to include the reporting procedures for COVID -19: -

RIDDOR reporting of COVID-19

You must only make a report under RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) when:

- an unintended incident at work has led to someone's possible or actual exposure to coronavirus. This must be reported as a dangerous occurrence.

or

- a worker has been diagnosed as having COVID 19 and there is reasonable evidence that it was caused by exposure at work. This must be reported as a case of disease.

There were no regulatory interventions affecting WFRS during this quarter.

5.0 Key Areas of Health and Safety Improvement in WFRS

It is very encouraging to report that health and safety continues to be integrated into a wide range of WFRS activities. During 2019/20 the areas include:

5.1 WFRS 'Hospital to Home' Service

The Health and Safety Department continues to assist with the planning and delivery of this well received service which is now embedded within the Service.

5.2 Analytical Risk Assessments (ARAs)

To improve health and safety during operational incidents ARAs are required. Once a dynamic risk assessment has been carried out and a tactical plan established, a more detailed assessment needs to be undertaken and recorded. To ensure officers are competent with this process, the health and safety Watch Manager has facilitated several training courses for level one and two supervisory officers who will then cascade this training down to their crews.

5.3 Control of Post Fire Contaminants

Nationally the above is still high on the NFCC Agenda

WFRS is continuing to implement good working practices, awareness and education, which includes:

- Four additional sets of PPE were provided to Breathing Apparatus Instructors (BAIs).
- The 'Standards of Dress Service' Order was reviewed and reinstated the parade process at the start of each shift to ensure all PPE is clean and in good condition.
- The Technical department carried out research and purchased effective wipes for personnel and equipment, to ensure 'basic' contamination and personal hygiene procedures could be carried out at the scene
- WFRS led on a regional poster/awareness campaign to promote the health and well-being of operational personnel, posters were supplied and displayed in the relevant stations/workplaces.
- Additional flash hoods provided to all crews.
- Nitrile gloves provided along with guidance for the decontaminations process.
- Face fit testing was carried out and personal issue P3 half mask respirators provided.
- PPE Bags provided for officers' cars and stations to be used on cover moves, red disposable bags also provided to ensure PPE is safety stored and transported.

- As part of the last PPE procurement process individuals were issued with 2 sets of PPE, to ensure effective laundering can take place.
- Occupational Health provide education regarding this potential risk to individuals during their health assessments.
- A CBT lecture package has been produced to educate the importance of 'post fire' hygiene.
- A new draft clean cab policy has been produced

One of the most recent effective control measures which has been procured by WFRS is an autoclave, which is planned to be ready for use in May this year. This sterilising unit which can house 4 BA sets at one time, will ensure a deep clean is carried out as part of the annual service. The unit will also be used after incidents as part of the decontamination process.

5.4 New Emergency Response Vehicles

The new Magirus M32 turntable ladder has been specifically designed and built to meet the needs of the service to help make Warwickshire communities safer. The vehicle has a 16-tonne chassis and has the added function of an independent rear wheel steer, which will permit good access and manoeuvrability within areas that have not been accessible to a WFRS aerial appliance before.

Following the tragic Grenfell Towers incident on 14 June 2017. This new aerial appliance, which is not only quick to deploy can also reach heights of up to 32 metres, which can the 13th floor of a tower block. There is one high rise in Warwickshire which has 15 floors, crews will deal with a fire at this property by gaining access to the 13th floor and putting in a jet up to the 15th floor. All of which will increase our ability to rescue people and fight fires in high rise properties.

The Health and Safety, Watch Manager has been actively involved with all stakeholders involved with this new appliance, to ensure legal compliance is met and suitable and sufficient policies, procedures and risk assessments are produced, along with quality assurance of all aspects of training, instruction and supervision.

The new appliance has now been in service since November 2019 and is based centrally at Leamington Fire Station, to ensure an effective response to high rise dwellings throughout Warwickshire as identified in the WFRS Integrated Risk Management Plan. The vehicle can also be deployed anywhere in Warwickshire for various incident types.

Health and Safety have also supported the replacement type 'B' project to identify the type of emergency vehicles are required as part of the continuous replacement schedule. The key health and safety considerations for these vehicles included,

effective stowage of equipment to reduce manual handling injuries, effective control of diesel emissions eg Euro 6 compliant and safe access and egress to vehicles. The outcome of the project is the Service has ordered twelve 15 tonne Volvo diesel appliances to be phased in over the next 5 years.

5.5 Officers Lease Cars

It is positive to report that the project to roll out officers' lease cars which started in 2018 is now complete for Group Managers and Station Managers.

5.6 Health and Safety Training

The following training was successfully undertaken this year by several relevant personnel:

- FRS bespoke 'IOSH Managing Safely'.
- NEBOSH General Certificate.

5.7 Health and Safety Inspections/Audits

A risk based programme of inspections is in place across all WFRS sites. These identify the physical workplace hazards and identify required actions for the responsible person to remedy. In 2019/20 most of these workplace inspections were undertaken as planned and the appropriate remedial actions were put in place.

This inspection process continues to work extremely well with the support of the Facilities Support Manager from WCC Enabling Services.

Please note a small number of inspections were postponed due to the COVID-19 pandemic, these will be rescheduled in as soon as working practices allow.

Regional Health and Safety Peer Review Audits

As part of the West Midlands Regional Health and Safety Business plan, peer review audits are carried out every 3 years. In April 2019 WFRS assisted with the peer review of West Midlands Fire Service. WFRS were also audited during this reporting period. The 3-day audit focused on the following areas:

- Breathing Apparatus
- Working at Height
- Slips, trips and falls

A comprehensive report was produced in January 2019 by the lead auditor from Hereford and Worcester Fire and Rescue Service.

The identified areas of good practice included:

- Staff were aware of their working at height limitations from the level of training provided.
- Training planner available for all operational training to guide competency and

compliance.

- An effective debrief process/system in place.
- An effective adverse event reporting system/process in place.
- Working at height equipment seen during the audit had been procured and upgraded well within the life expectancy of the equipment.
- Suitable evidence was found to suggest that operational learning was being embedded within the organisation.
- Evidence was provided to the audit team to demonstrate repairs and equipment periodic servicing is in place to support the high level of confidence in the BA equipment.
- BA competency framework in place.
- Housekeeping on stations was very good with fixtures and fittings in good condition.
- Annual workplace inspections are carried out.
- All personnel were aware of the arrangements for gritting and adverse weather arrangements and referred to the risk assessments for this.

The recommendations from the report include:

- To provide a periodic download of information to supervisory managers to confirm BA checks are completed to the required standard and frequency.
- Review the Working at Height Policy.
- Review equipment manuals.
- Review the working at height training on stations to include risk assessments.
- Review the process in place for the equipment testing records.
- Produce and implement a quarterly health and safety check list for stations/workplaces.
- Review the safety shoes worn by operational crews.

A recommendations action plan has been produced; the work to implement these will be monitored by Health, Safety and Wellbeing Committee.

The next review was planned to take place at the end of April 2020 at Shropshire Fire and Rescue Service, the audit was being led by the WFRS Senior Health and Safety Advisor. However, due to COVID-19 this audit has been postponed and rearranged for April 2021.

This peer review audit process is extremely useful and allows for the sharing of good health and safety practice within the West Midlands Region.

5.8 **HMICFRS Inspection**

Preparations and work for the next inspection were underway including meetings with the health and safety team, however due to COVID-19 this

inspection was postponed.

5.9 WFRS Health and Safety Practitioners Group

This group continues to work effectively, the members include both uniformed and non-uniformed managers who are NEBOSH qualified and represent departments of the Service. The group is chaired and managed by the H&S Watch Manager and overseen by the Senior Health and Safety Advisor. The Practitioner's roles and responsibilities support the service and their individual departments as well as promoting good/best health and safety practices throughout the service. This year the work carried out by the group includes:

- a review on station gyms
- the production of risk assessments for stations/workplaces during adverse weather conditions
- the potential use of virtual reality equipment for health and safety training
- a review and production of new health and safety computer based training packages
- completion of risk assessments on stations to control diesel emissions, and the implementation of improvements
- continuous improvements to control the potential exposure to contaminants

5.10 Performance against last year's Health and Safety Departmental Plan

The H&S Department has continued to make every effort to carry out the work streams included in the departmental plan.

Since early March, priorities have changed due to COVID-19 pandemic. On the 13/03/2020 the Local Resilience Forum aware notified that WFRS were implementing Business Continuity Plans (BCP) due to the COVID-19 pandemic.

On initiation of the BCP, a Business Continuity Co-ordination Team (BCCT) was established to co-ordinate initial pre-planning, combined with considered action based on Government guidance to address the immediate risks to staff, and protect the essential services WFRS provide.

A great deal of work has been carried out developing new work areas supporting the NHS and the most vulnerable within our communities. These activities include, delivery of provisions/medication to vulnerable persons shielding, body recovery, delivery of PPE to local trusts and an increase in the use of the Hospital to Home function. In addition to this the Health and Safety Department have been proactive in producing risk assessments for activities agreed with the representative bodies as part of the tripartite agreement.

This work to some extent redesigned how the service works, and how we do it. Due to the fast pace of the pandemic the business continuity team had to establish future working practises and planning for risks and impacts over the short, medium and long term into the recovery period.

Facilitating this included establishing and updating a Covid-19 risk register. The aim of the risk register was to provide an overview of the risks posed by Covid-19, our control measures through existing pre-planning documents such as Business Impact Assessments (BIA's) for all departments, Business Continuity Plans (BCP's) currently in place along with the production of new and reviewing of existing risk assessments, and providing guidance to ensure the wellbeing of our staff and compliance with Health and Safety legislation.

From a business continuity perspective, the risk register has built a record of the measures taken by the service and assisted in evidencing the need for any change of approach to senior managers. It has also helped senior officers to formulate a plan covering the time frames, risk critical elements and priorities to keep the service working effectively both now and after the pandemic in the 'new normal'.

The Health and Safety team have been and are working alongside the BCCT to identify recovery of prioritised functions, tailoring our approach to the current situation whilst minimising the impacts for the future.

The main responsibility of the Health and Safety team during this time, is to ensure that service health and safety policies and procedures are adhered to. The team have been actively involved in working with managers and Rep Bodies, to produce risk assessments, to ensure the risks are identified are adequately controlled for the new activities which WFRS are carrying out to support the communities of Warwickshire.

Whilst the risk register is currently the BCCT's focus, we plan to keep liaising with departments to develop and strengthen their BIA's and resulting Business Continuity Plans as appropriate. Where BCP's don't currently exist, or don't fit the current situation, the risk register will also help in developing these documents and will evidence a suitable approach by analysing the impacts of the current situation and planning a prioritised response to recovery.

6.0 Health and Safety Monitoring/Performance Data

Accidents/Incidents (Adverse Events) Statistics – Trend Analysis

	2017/2018	2018/2019	2019/2020
Dangerous Occurrence	1	0	1
Major Injuries	0	0	0
RIDDOR Injuries (over 7 days)	4	2	2
Near Misses	43	49	46
Personnel Injury	34	30	33

Vehicle Incident	29	23	32
Violence and Aggression	6	7	7

It is encouraging to report the number of personal injuries although slightly up this year with 33 reported, the numbers have remained constant over the last 3 years. All incidents have been investigated and where required improvements made. There were no significant trends identified.

A total of 32 vehicle incidents were reported, which is a significant increase of 9 compared to last year. Following investigation, it was identified that 10 of these incidents were caused by 'non fault' of WFRS drivers.

There was no increase in the number of violence and aggression incidents reported. The Health and Safety Department liaised with the WFRS Arson Reduction/Community Fire Safety Team and arranged for bespoke violence and aggression/diffuser training course; this training was very well received. In addition to this body worn cameras are also utilised when attending incidents in known 'hot spots' Positive support continues to be provided by the service ASBIT Team and the positive intervention of Warwickshire Police.

The number of near misses reported again although a slight decrease has remained constant over the last 3 years. The health and safety department continue to raise awareness and educate personnel in the benefits of near miss reporting.

6.1 The Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR)

It is encouraging to report for the last 3 years they have been no 'major injuries' reported.

One 'dangerous occurrence was reported this year, relating to a 'distress to wearer'. An investigation has been carried out with no fault found relating to the BA set, which was independently inspected by Staffordshire Fire & Rescue qualified BA technicians. At the time of writing this report the final report and findings are currently in draft format.

It's positive to report no increase in the number of 'over 7-day injuries. Two incidents were reported, both were investigated and where required improvements were made. In total 39 working days were lost as a result of these incidents.

6.2 Common Identified Causes

Causes	2017/18		2018/2019		2019/2020	
	Half Year	Year End	Half Year	Year End	Half Year	Year End
Personal Injury	19	30	13	30	20	33
Manual Handling	6	6	1	2	6	6

Slips, Trips & Falls	2	4	0	6	2	6
Hit by moving, flying or falling object	0	9	4	4	6	6
Hit something fixed or stationary	2	2	3	3	3	6
Burns - Operational		2	0	0	0	1
Burns - Training	0	0	1	3	1	1
RIDDOR Major Accidents	0	0	0	0	0	0
RIDDOR Over 7 Day Accidents	3	4	1	2	2	2
RIDDOR Dangerous Occurrences	0	1	0	0	0	1
Near Misses/Hits	20	43	41	49	19	46
Acts of aggression to Operational Staff	1	6	5	6	5	7
Acts of aggression to Non-Operational Staff	0	0	0	1	0	0
No. Employees	453	462	458	426	458	441

A total of 5 adverse events were reported under the other category.

The manual handling, hit by moving, flying or falling objects and hit by something fixed or stationary incidents have increased this year, all of which resulted in minor injuries. All incidents were investigated which identified no trends.

7.0 Occupational Health Departmental Update 2019/2020

7.1 Overview

The main service priority for Occupational Health is to ensure all staff are physically and psychologically fit to effectively undertake their roles and responsibilities. The department provides a range of health screening services, along with the provision of health and wellbeing advice and training. Another priority is to ensure staff who have been absent from work are supported during their return to work and where necessary, sickness absence is robustly managed.

7.2 Staffing Model and Establishment

- Occupational Health and Wellbeing Manager – 30 hours per week
- Occupational Health Advisor – 25 hours per week
- Service Medical Advisor – 4 hours per week
- Occupational Health/Health and Safety Administrator – 24 hours
- Service Fitness Advisor – Ad-hoc hours to meet service needs

The Occupational Health Advisor's work continues to see an increase in the number of statutory asbestos screenings and follow up appointments after three yearly

medicals, this ensures minor issues are noted are rectified.

New initiatives have included the establishment of a Wellbeing Peer Support service. The team has been trained in mental health awareness and active listening skills. The team was launched in April 2019, along with a refresh of the Trauma Support Team. Both teams will be instrumental in raising awareness in respect of the impact of critical incidents and wellbeing education.

8.0 Occupational Health Statistics

Counselling and Psychotherapy Activity – 1 April 2019 – 31 March 2020

During the above period there were 29 new referrals, 13 of which were returning clients with new presenting issues. In total, 413 formally contracted counselling/psychotherapy sessions have been provided. This figure does not include one off appointments, or people who just needed a safe and neutral space to talk through a current issue without therapeutic intervention.

The Annual Client Profile for the above-mentioned period

Total of 56 Clients – 42 Uniformed and 14 Non-Uniformed

Male – 38 and Female - 18

Presenting Issue	Total No. of cases	Work Related	Personal	Combination	Comments
Depression	14	1	4	9	All cases clinically assessed using CORE 3 cases suicide risk
Anxiety – General	12	2	5	5	1 case relating to impact of menopause 1 case severe OCD
Post-Traumatic Stress Disorder (PTSD)	10	4	4	2	3 cases Atherstone on Stour related 1 case high suicide risk
Relationships	7		5	2	
Low Mood	4	1	1	2	
Addiction/Self-Harm	3		3		
Bereavement/Loss	3		3		

Terminal Illness/Cancer	3		2	1	
Totals	56	8	27	21	

Client Profile and Presenting Issues as of 31 March 2020.

Total of 28 ongoing clients - **22** Uniformed and **6** Non-Uniformed

Male - **18** and Female - **10**

Presenting Issue	Total No. of cases	Work Related	Personal	Combination	Comments
Post-Traumatic Stress Disorder (PTSD)	7	4	2	1	3 cases Atherstone on Stour related
Anxiety - General	5		3	2	
Depression	5			5	All cases clinically assessed using CORE
Relationships	4		4		
Addiction/Self Harm	2		1	1	
Low Mood	2	1	1		
Terminal Illness/ Cancer	2		2		
Bereavement/Loss	1		1		
Totals	28	5	14	9	

Statistics for period 1 April 2019 – 31 March 2020

Service Medical Advisor Activity

Type of Appointment	Number Undertaken	Comments
Clinical Reviews	103	To monitor progress and phased return to work plans
Referrals	58	64% Musculoskeletal
LGV Medicals	57	100% pass rate
Asbestos Screenings	40	No issues arising from exposure to Asbestos were noted.
New Recruit Medicals (RDS and WT)	37	1 individual did not pass the Chester Step Test 2 Individuals Red/Green Colour Blind

Other Contracts (Coventry Airport)	1	100% pass rate
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Occupational Health Advisor

Type of Appointment	Number Undertaken	Comments
3 Yearly Medicals	74	All medicals are up to date
Follow-ups and sickness absence reviews	47	It is now easier to complete these reviews as the department have full access to Your HR sickness records.
LGV Medicals	57	100% pass rate
BAI Medicals	17	6 monthly routine now established.
New Recruit Medicals (On-Call and WT)	37	1 individual did not pass the Chester Step Test 2 Individuals Red/Green Colour Blind
Other Contracts (Coventry Airport)	1	100% pass rate

Failed to Attend Appointments

Person with whom appointment was missed	Number of missed appointments	Comments
Service Medical Advisor	1	This represents a 83.5% decrease in missed appointments
Occupational Health Advisor	5	71% decrease

It is very positive to note the large decrease in missed appointments.

Private Treatment Referrals and Flu Vaccinations

Type of Appointment	Number Undertaken	Cost to WFRS	Comments
Physiotherapy	88	£3,894	Combination of upper and lower limb disorders 5 Cases required surgery A majority remained at work or on light duties
Private Scans (MRI, CT etc.)	2	£795	2 MRI/CAT scans with follow-up consultations.
External Counselling/Mentoring	23	£1666	Unable to be treated by WFRS counsellor due to ethical boundaries.
Eye Protection	17	£1924	17 provisions of safety glasses and BA inserts where appropriate
Other Consultants	4	£942	Second opinions required.
Podiatry Assessments	6	£288	When PPE is causing issues for wearer
Dyslexia Assessments	2	£500	
Flu Vaccinations	50	£340	

Annual Fitness Testing

In line with previous years, the fitness testing has been completed with 10 people unable to take the annual test due to injury, long term sickness or maternity. Overall 312 have been completed and passed, which equates to a 97% pass rate.

General update on new activities during 2019/20

Wellbeing Ambassadors – A new team of over 20 volunteers who have been trained in Mental Health and Wellbeing Awareness and Active Listening Skills are now available for initial peer support and signposting for their colleagues. Some of the team have been trained in suicide awareness and prevention and a package of suicide awareness training is proposed for all crews and teams during 2020/21. The posters and awareness campaign commenced in March 2020 and will continue via regular updates and dedicated health and wellbeing notice- boards and folders on all stations will be delivered to all locations in the near future.

In addition, WFRS Occupational Health and Wellbeing Manager delivered the training for WCC Listening Mates, this was well received, and further training sessions are proposed in the near future, which may also be delivered as a joint venture including both WFRS and WCC employees.

March saw the first edition of the Occupational Health Newsletter, this edition focussed on COVID-19, the Wellbeing Ambassadors, Critical Incident Wellbeing and Muscular Skeletal wellbeing. In early April a special edition newsletter will be distributed which will focus on mental health and resilience due to the ongoing impact of COVID-19.

In light of COVID-19, additional updates will be sent to all staff reminding them of how to safe and well, with a particular emphasis on mental health and wellbeing. This feels particularly important due to the increasing number of people being required to self-isolate or affected in other ways.

The impact of COVID-19 has been felt by the Occupational Health Team where many of our working practices have needed to be adjusted to respond to the ongoing demands of customer base. Understandably, there has been some anxiety from within the team and across the organisation about how we maintain key services within times of such uncertainty and increased risk to physical and psychological wellbeing. For the time-being routine 3 yearly health screens have been postponed and referrals/reviews for the Service Medical Advisor are being conducted remotely. However, if necessary, he will be able to see personnel in a controlled clinical environment, should the need arise.

With regard to counselling and psychotherapy sessions, these are mainly being conducted over Zoom, although not ideal this still remains as it a preferred option by the British Association of Counselling and Psychotherapy. The exception is when a client requires specialist trauma treatment, this is undertaken face to face whilst wearing suitable PPE.

Financial Implications

None

Environmental Implications

None

9.0 Conclusion

During this year, both the Health and Safety and Occupational Health & Wellbeing Departments have continued to work efficiently, providing a professional service to ensure the Authority meets its statutory duties.

The benefits of having both operational and non-operational personnel in the health and safety team continues to work effectively and ensures managers receive competent advice and guidance. The operational knowledge supports departments such as Technical Support, Training, Operational Policy and Response, which are all critical functions.

Last years review of the Occupational Health and Wellbeing Department and the appointment of the Occupational Health Advisor also continues to work well, with several new initiatives introduced this year, in particular the Wellbeing Peer Support service and the review of the Trauma Support service.

Overall it is very encouraging to report again this year that no 'major injuries' were reported and there was also no increase in the number of 'over 7 day' injuries. Although there has been a small increase of personal injuries, these have remained consistent over the past 3 years. Over the next few months both the Occupational Health, Safety and Wellbeing and Health and Safety Departments will continue to prioritise their work to ensure we meet the ongoing demands arising from COVID-19, by providing a robust service as we protect and support the health, safety and wellbeing of all WFRS personnel.

Background Papers

None

	Name	Contact Information
Report Author	ACFO Ben Brook Assistant Chief Fire Officer	benbrook@warwickshire.gov.uk
Assistant Director	Kieran Amos	kieranamos@warwickshire.gov.uk

Strategic Director	Mark Ryder	markryder@warwickshire.gov.uk
Portfolio Holder	Andy Crump	andycrump@warwickshire.gov.uk

Other Councillors: Councillors Crump, Kaur, Gifford and Stevens

Staff & Pensions Committee

Annual Health, Safety and Wellbeing Report 2019/2020

8 June 2020

Recommendation(s)

That the Staff and Pensions Committee:

- Notes the information contained within this report
- Endorses and supports a proactive approach to the management of health, safety and wellbeing
- Endorses and supports the promotion of a positive health, safety and wellbeing culture

1. Executive Summary

In addition to the continued delivery of a proactive and professional service, the HSW team has observed and evidenced a general improvement in positive health, safety and wellbeing culture across the authority.

- 1.1 The following is a summary of good practice and improvement;
 - Reduction in reportable (to HSE) accidents/incidents
 - No regulatory intervention
 - Overall improvement in awareness of health, safety and wellbeing requirements and responsibilities
 - Good practice in workplace inspections and management of HSW audits
 - Increased awareness and understanding of wellbeing and mental health requirements and support available
- 1.2 These have been identified;
 - Through HSW actions taken by managers
 - During audits and inspections
 - Discussion and feedback through delivery of HSW training
 - Proactive requests for further HSW support
 - Visits and meetings with managers
- 1.3 Key areas of work during 2019/20 have included;
 - Improved and robust auditing process and documentation
 - County Fleet Maintenance noise level measurement
 - Launch of listening mates
 - Delivery of wellbeing and mental health training
 - Introduction of individual and team wellness plans

- Improved access and awareness of wellbeing/employee support information
- Extension of the EAP service to Foster Carers and traded offer to maintained schools.

2. Financial Implications

None

3. Environmental Implications

None

4. Supporting Information

The purpose of this report is to provide Staff and Pensions Committee with information on the management and performance of health, safety and wellbeing within Warwickshire County Council* (WCC). It summarises the key health, safety and wellbeing (HSW) initiatives/progress/statistical analysis for the period of 1st April 2019 to the 31st March 2020.

*This report **does not** include any information or data related specifically to Warwickshire Fire and Rescue Service (WF&RS) as they produce their own report to Staff and Pensions, alongside this report.

This report includes information on;

- Key areas of health, safety and wellbeing
- Relevant HSW performance and comparison data
- HSW priorities for 2020/2021

5. Background

This report includes corporate level HSW information only. The information relates to WCC employees and their work activities for which we have statutory health and safety responsibilities. Therefore, this includes Community and Voluntary Controlled Schools.

The report also contains information on accidents/incidents to others; pupils, members of the public and clients, that access our WCC sites and services as we have a legal duty of care to ensure their safety as far as is reasonably practicable.

Specific Directorate/Business Unit/service and team level information is reported on and presented at the relevant Directorate Leadership Team meeting on a quarterly basis. This ensures timely information which enables and encourages positive action to be taken by senior management, where necessary.

5.1 Legal updates

The RIDDOR Regulations have recently been temporarily amended to include the reporting procedures for COVID -19:-

You must only make a report under RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) when:

- an unintended incident at work has led to someone's possible or actual exposure to coronavirus. This must be reported as a dangerous occurrence, or
- a worker has been diagnosed as having COVID 19 and there is reasonable evidence that it was caused by exposure at work. This must be reported as a case of disease.

5.2 WCC Regulatory Intervention

There were no regulatory interventions affecting WCC during 2019/20.

5.3 Health and Safety Monitoring/Performance Data

Accident/Incident Statistics Analysis

There was a total of 1168 reported accidents/incidents in 2019/20 across the three Directorates including schools where WCC is the employer (Community and Voluntary Controlled). This is an overall increase of 11% of reported accidents/incidents in comparison to 1054 in 2018/19.

There has also been an increase of 26% in employee accidents/incidents with no change in the amount of non-employee accidents/incidents. Most of this increase is in schools – violence involving pupils (see **kind of accidents** for details)

- 513 accidents/incidents were to employees
(*against an FTE employee figure of 8014*) which equates to only 6% of employees. As the organisation continues to change, we will include these % statistics against the FTE to show the comparison year on year.
- 655 accidents/incidents involving non-employees (pupils and visitors)
- Country Parks had a visitor footfall of 985,377 for 2019/20. There were 55 accidents/incidents to non-employees (visitors) this equates to only 0.0056%.
- Libraries had a visitor footfall of 1,366,590 for 2019/20. There were 29 accidents/incidents to non-employees (visitors) this equates to only 0.0021%.

The majority of these non-employee incidents were minor slips, trips and falls resulting in grazes and bruises.

In consideration of the large volume of visitors and the activities at these sites, these statistics demonstrate the effective safety management these services have implemented.

There has also been a reduction of 41% in reportable accidents/incidents; those reported to the HSE under the Reportable, Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR), 16 in comparison to 27 in 2018/19. (See **Kind of Accidents** for details)

Factors that may potentially attribute to the reduction in RIDDOR's are; improved management of health and safety and suitable control measures; improved HSW training, awareness and proactive and targeted support and advice.

The highest kind of accident/incident continues to be 'slip, trip and falls', however the highest increase in kinds of accident/incident compared to 2018/19 is in schools "violence involving pupils". **(2)** below

Kinds of accident/incidents reported

The highest kinds of accident/incidents, in order are as follows:

Category	2018/19	2019/20
1.Slip, trips and falls	242	220
2.Schools – violence involving pupils	84	192
3.Schools – accidental during play	154	155
4.Abuse/verbal/written/digital/media	53	68
5.Near miss	57	55

(1) Slips, trips and falls continue to be the highest "kind of accident" although there has been a slight reduction from last year. The majority of these involve members of the public and pupils in schools.

(2) Of the 192 for schools - violence involving pupils, 17 were pupil on pupil injuries and 165 were incidents involving a pupil and an employee/volunteer. Of these incidents, there were no issues or trends and were mainly pupils kicking or biting resulting in bites, bumps and bruises. The increase from 84 last year to 192 this year could be in part based on improved reporting of this type of incident by schools.

To add context to these statistics -

- Half of the reported accidents/incidents in this category were from the same 4 schools, Water Orton (32), Lillington (23), Long Lawford (20) and Round Oak (19). The others were from 30 other schools.
- Water Orton, Long Lawford, Round Oak and Brookhurst schools, 50% or more of the accidents/incidents reported in this category were for the same one or two pupils.
- Almost a third of these incidents overall were relating to the same one or two pupils.
- Nearly 3 out of 5 children involved in the accident/incident have special needs/Educational, Health Care plans.

The HSW team have been promoting the requirement for accident/incident reporting as part of the Management of H&S training over the past year.

Violence and aggression towards teaching staff has also been on the agenda of the Teaching Representative Panel meetings recently. Members have also been reminding schools and teaching staff that these incidents must be reported. The unions also discussed setting up a working group to produce a school specific guide on how to reduce violence and aggression towards staff. The HSW team have offered to be part of this working group when formed.

(3) The majority of the school's incidents were in the playground/play area of the school.

(4) Abuse/verbal for 2019/20 relates mostly to face to face verbal abuse to operatives on HWRC's (22); and social care staff (17) e.g. when making appointments to see parents or discussing subjects like financial support, giving messages that parents don't want to hear.

(5) 50% of the near misses were during Household Waste Recycling Centre activities, usually members of the public attempting to access prohibited areas where heavy plant is operating.

A further breakdown on accidents/incidents against each Directorate and on the kinds of accidents/incidents can be found in **Appendix 1**.

HSE RIDDOR Reportable Accidents/Incidents

A total of 16 incidents were reported to the HSE as required under the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR).

In total there were 14 employee RIDDOR's and 2 non-employee RIDDOR's. Of the 14 that involved employees 8 occurred in schools and most of these involved slips, trips and falls, resulting in fractures and other injuries preventing the injured persons attendance at work for 7 days and over.

Of the 6 non-school employee RIDDOR's: -

2 occurred at the County Fleet Maintenance sites which were investigated by the HSW team to ensure the service had implemented measures to prevent recurrence:

- 1 incident was caused by a mechanic using an inappropriate tool for the task. Following the investigation, a more appropriate tool was identified and purchased for this task in the future. (a torque multiplier rather than a torque wrench)
- 1 incident was as a result of a member of staff not opening a door fully to allow them free entry/egress. This resulted in a bin they were moving hitting the door and impact to their lower leg aggravating an existing issue. The member of staff has been reminded and instructed to use a stack truck and to fully open the door in future

The other 4 were:

- 1 road traffic accident involving a member of staff
- 1 member of the public who hurt his arm on the faulty automatic door in Shire Hall (the sensor was replaced, and regular checks now being undertaken on the door)
- 1 member of staff affected by inappropriate remarks and intimidated by a client they were visiting
- 1 member of staff in Education services demonstrating drama activity, popped her knee

(all the incidents involving staff resulted in them being off sick for more than 7 days)

Inspections and Audits

Workplace Inspections

Annual/bi-annual inspections have been undertaken across 60% of all workplaces/sites prior to being suspended due to COVID19. These have identified consistent good practice in general with just a few areas for improvement. No significant hazards have been identified during the inspections for 2019/20.

There has also been continuous improvement in site responsible persons understanding the importance of undertaking the inspections.

The HSW Team are now measuring and rating the performance of each workplace inspection. This has shown a positive result with all the inspections receiving a majority rating of over 90% and a minimum of at least 82%.

Common areas of non-compliance identified were inconsistent record keeping in areas such as fire risk assessment actions, COSHH risk assessments and water hygiene checks.

Management of Health, Safety & Wellbeing and COSHH Audits

A total of 5 comprehensive audits were undertaken by the HSW team across WCC services following the new audit procedure, introduced in June 2019. Generally, there was a good level of compliance.

The main, common areas identified for improvement were risk assessments not being undertaken/not being “suitable and sufficient” or not being up to date, closely followed by mandatory training not being identified, completed or effectively managed.

Audit reports are now rated, allowing us to benchmark against other services, services subsequent audits and advise on sharing best practice where applicable.

Audit actions are now aligned to specific individuals with agreed and reasonable target dates for completion which the HSW team support and monitor through to completion.

Note: Due to COVID 19 pressure on services, any outstanding audit actions against the timescales are being discussed and reviewed with the service manager to reflect this.

The HSW team will provide data on the overall audit ratings and actions for each service, providing visibility on areas of improvement made and to improve the overall effectiveness for reporting and monitoring of Health, Safety & Wellbeing related areas.

These audits will also allow us to identify where there are common areas and trends that may need overall, strategic improvement across WCC services and where the HSW team can provide further information, guidance and support.

Control of Substances Hazardous to Health (COSHH) Audits

A total of 48 audits were undertaken by the COSHH Officer during 2019/20.

The main, common areas identified for improvement were missing or outdated risk assessments and data sheets, although this was less than in the previous years. Some COSHH risk assessments were also lacking the annual review, but this has improved from previous years due to the addition of a review sheet.

There has been a notable increase in the number of new school caretakers for this period compared to previous years. This has increased the requirement to provide specific COSHH advice and on-site training and requests for an audit outside of the usual school schedule. This is a positive trend as the caretakers are aware of their COSHH responsibilities and proactively requesting support.

Appendix 2 shows further detail of the audits undertaken in the specific services, overall audit ratings, agreed actions and actions outstanding.

Display Screen Equipment Assessments

The DSE referral is a process that the HSW service offers to managers and staff. This is when managers are unable to find a suitable solution to workstation issues identified by staff and require assistance. Telephone advice or a face to face DSE assessment are undertaken by an HSW Advisor.

There have been 65 requests for DSE referrals in 2019/20, 61 of which have resulted in face to face DSE Assessments being undertaken.

Feedback has been received on 27 of these assessments at the time of writing this the report of which

- 89% have confirmed that the recommendations made have been implemented
- 93% have confirmed that the recommendations made have improved their workstation set-up and therefore eliminated or reduced the issues raised
- An average rating of 9.4 out of 10 was given for the quality of the DSE referral process and the recommendations made

Comments from feedback include:

- “Recommendations have been extremely helpful in improving my workstation setup”
- “The assessment has definitely improved my workstation and has made me much more aware of right height for screen, chair and sitting position
- “Assessment has been very helpful”

Work Equipment

WCC services have had 2898 items of work equipment tested and examined by our Zurich engineer contractors during 2019/20 to ensure that these are safe to use/operate and comply with the relevant legislation. This includes lifts and lifting equipment.

The HSW team have proactively audited and monitored the progress on actions required for any defects identified by the engineers, through the WCC Crimson System that holds this information.

There has been a slight improvement in comparison to last year that shows that 79% of the equipment tested and examined passed, compared to 73% in 2018/19, whilst only 1% showed a major defect (consistent with 2018/19).

Employee Assistance Programme (EAP)

The EAP provision has continued to be extensively communicated and promoted to employees. An event was held in July to promote the benefits of the provision, this was well attended with positive feedback. Managers and the intranet were the main source of awareness of the service.

This provision is available to all WCC employees (excluding WFRS who have their own in-house provision). During 2020 this was also made available to all WCC’s 260 foster carers.

This has also now been made available as part of the WES traded offer to schools (where WCC is the employer). 107 schools have currently subscribed for the 2020/21 financial year. Educaterers also purchase this provision.

Summary of Use (April 2019 – March 2020)

The following is a summary of the use of the provision for the period April 2019 through to March 2020. The average usage rate during this period was 4.2%. The standard utilisation benchmark for EAP is 5% of the workforce.

The highest work issues presented were:

1. Work stress
2. Mental health
3. Control Over Work

The highest personal issues presented were:

1. Mental health

2. Family
3. Relationships

For the emotional support service, the highest Directorate users were:

1. People 84
2. Resources 49
3. Communities 36

The highest use in services (compared to others) were:

1. People – Social Care & Support and Children and Families
2. Resources – Customer Services
3. Communities – Communities Services

Further information is shown in **Appendix 3**.

Occupational Health (OH)

The OH provision continues to be used proactively and effectively by managers. This ensures that employees are referred at the right time to enable support/adjustments to be made to maintain their attendance at work or an effective and quick return to work. This is available to all WCC staff and in schools where WCC is the employer. (this excludes WF&RS who have their own in-house provision).

In terms of contract management, occupational health is a proactive provider who work positively and supportively with HSW, referring managers and HR Advisors to address any case queries or process issues and regularly offer support on further progress and improvement for the OH provision.

The improved provision in terms of speed of the assessment and report outcome enables managers to support staff appropriately to enable them to continue in work or for staff to return to work as soon as possible.

This is one of the measures of improvement that will subsequently, continually assist in reducing the sickness absence rate.

Summary of Use (April 2019 – January 2020) - (MI only available for up to Jan 2020 due to changes in reporting process)

The following is a summary of the use of the provision over the period April 2019 through to January 2020. Further information is shown in Appendix 3.

The number of referrals made during the period of the contract are, generally, comparative with the last two years for the previous contract provider:

The highest numbers of referrals made in Directorates were:

1. People – 260
2. Resources – 132
3. Communities – 118

4. Schools – 197

The highest in services (compared to others) for July 2019 – Jan 2020 were:

1. People – Children & Families (84) Social Care & Support (80)
2. Resources – Customer Services (24)
3. Communities – Education and Learning (21)

The two main reasons for referrals during the period July 19 – Jan 20 were;

- Mental health issues at 46%
- Musculoskeletal at 20%

70% of all referrals were non-work related with 7% primarily work-related, 15% work aggravated, and 7% work attributed and 1% work accident.

Further information is shown in **Appendix 4**.

Workplace Health and Wellbeing

Projects and initiatives on employee wellbeing have continued to meet the actions of the Workplace Health and Wellbeing Strategy 2018-2020.

Most of the actions from the first phase implementation plan have now been completed. The implementation plans included elements such as staff engagement; communication and awareness; sickness absence; occupational health, employee assistance programme and more understanding around mental health.

Relevant colleagues, managers and staff were involved in the health and wellbeing actions and initiatives, through the steering group. This includes a strong link with Public Health, Year of Wellbeing external partners such as NHS and Mind Mental Health.

Key actions progressed and implemented from the strategy plan, are as follows: -

- Your Wellbeing intranet page being regularly updated with information and resources from OH and EAP, health topics, training, support and information
- Continuation of Wellbeing Wednesday (WW) intranet slots which promoted health and wellbeing campaigns, information and signposting to EAP and Year of Wellbeing initiatives.
 - This method of communication has now been updated since January 2020, based on read rate of the WW articles and instead, general wellbeing updates are being included in directorate briefings and Working for Warwickshire to maximise audience reach.
- Recruitment, training and promotion of WCC Wellbeing Champions to support teams and staff with positive health and wellbeing.
 - There are 31 trained Champions in WCC plus a large number across West Midland Combined Authority. The Senior Wellbeing Officer coordinates the WCC Champions and regularly updates and meets with them. The Champions also have a monthly newsletter as a way of keeping up to date with best practice.

- Recruitment, training and promotion of WCC Listening Mates to replace the Dignity at Work contacts to support and signpost staff if something is wrong at work, or at home and it is affecting them at work. They received mental health first aid training, bullying, harassment and discrimination training, and active listening training.
 - Worked with the EDI team to coordinate recruitment and training and worked with WFRS Occupational Health & Wellbeing manager to provide training.
- WCC sign up to the Thrive at Work commitment, working on attaining the Bronze Level to benchmark against best practice and identify gaps within WCC; this now has 83% completion.
- Wellbeing and mental health awareness sessions delivered to teams:
 - Wellbeing = 32 sessions (Communities x7; People x13; Resources x6; Apprentice inductions x2; Corporate HSW training x2; Schools HSW training x1)
 - Mental Health = 22 sessions (Communities x3; People x3; Resources x3 [plus bespoke training at 5 libraries]; Learning at Work sessions x4; School Governors SEMH Conference [100 governors in attendance]; Mental Health Awareness training for managers x1; Mental Health Awareness training for staff x2)
- Additional resilience and mindfulness training sessions.
- New work life balance training sessions.
- Health, Safety and Wellbeing service attendance at all building user group meetings to identify any wellbeing/work environment issues for advice and support.
- Development of Individual and Team Wellness Plans to replace the Stress Risk Assessments as a proactive and preventative tool available to all staff, not just those who are absent.

There was a 4% increase in the 2019 Your Say survey response for the question “*employee wellbeing is promoted at work*” which is an overall increase of 9% since 2017 and demonstrates staff awareness of positive wellbeing within WCC.

Sickness Absence

The Annual Sickness Absence report will be presented to the committee in September; however, it should be noted within this report that the end of year figure is an increase to 10.84 days per FTE in comparison to last year 9.51.

The two highest causes for sickness absence remain as musculoskeletal (MSK) and mental health. Whilst MSK has reduced from 19.6% to 17.16% this year, mental health has increased from 25.7% to 29.12%. Although mental health is still an area for improvement, the increase could be a result of staff feeling more comfortable to discuss this openly with their manager and record that they are mentally ill rather than using a physical reason instead.

COVID 19 Related Initiatives

This is a summary of specific initiatives and actions since March 2020, in relation to COVID 19.

- Employee Assistance Programme (EAP) provision to schools (as a buy-in option) in place before schools closed
- EAP provision to staff in 280 Social Care Provider organisations: care homes; domiciliary and supported living provision.
- EAP bereavement, trauma and grief provision defined
- Availability of COVID 19 Occupational Health referrals and assessments
- Team of representatives set up to discuss wellbeing information and support to staff; key actions to date: Keeping you well and at work, information, guidance, tips and support to staff on the intranet pages
Wellbeing articles and updates in the Working4Warwickshire weekly newsletter
Staff wellbeing check-in survey implemented (see Appendix 5 for initial results)
Action plan for further information, support, initiatives from survey

Health, Safety and Wellbeing Service Priorities for 2020/21

- Health, Safety and Wellbeing policies and guidance reviewed and updated as user friendly, clear and concise documents in line with current health and safety legislation
- Schedule of management of health, safety and wellbeing audits
- Phase 2 of the Workplace Wellbeing Strategy; focusing on mental wellbeing, in line with the requirements of the Thrive at Work bronze level commitment - *Mental health issues both personal and work-related remain our highest sickness absence illness, reason for referrals to OH and our EAP presenting reasons*
- Effectively integrate the traded, Safety and Premises service within the HSW service

COVID-19 Specific Priorities:

- Support and input into assessing the staff feedback from the wellbeing check-in survey to include:
 - Raised awareness of all employee support available
 - Wellbeing, physical and mental health support and information
 - Information, guidance and tools for managers and staff to continue to work from home as safely and effectively as possible
 - Guidance and tools for managers to ensure effective communication, check-in and support to staff
 - Risk assessment and health, safety and wellbeing guidance, documents, support and advice to services on recovery and re-instatement

5. Timescales associated with the decision and next steps

None

Background Papers

None

	Name	Contact Information
Report Author	Sally Brandrick	sallybrandrick@warwickshire.gov.uk
Assistant Director	Craig Cusack	craigcusack@warwickshire.gov.uk
Lead Director	Rob Powell	robpowell@warwickshire.gov.uk
Lead Member	Kam Kaur	kamkaur@warwickshire.gov.uk

The report was circulated to the following members prior to publication:

Local Member(s): None

Other members: Councillors Kaur, Gifford and Stevens

Appendices

Appendix 1

Accidents/Incidents break down by Directorates

Directorate	2018/19	2019/20
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People Directorate	91	99
Resources Directorate	84	75
Communities Directorate	259	256
Schools (Community and Voluntary Controlled)	620	738
Total	1054	1168

Kind of Accident/Incident	2018-2019	2019/20
Slip, trip or fall	242	220
Schools only - violence involving pupils	84	192
Schools only - accidental during play	154	155
Abuse - Verbal/written/digital/media	53	68
Near Miss	57	55
Hit by moving object	47	48
Hit fixed/stationary object	48	46
Dangerous Occurrence	18	41
Vehicle related incident	37	40
Manual Handling - objects	28	37
Play equipment	24	35
Non - work related ill health	35	26
Sharp Object/Surface - contact with	21	24
Trapped	9	17
Anti-Social Behaviour	22	15
Assault - Physical - malicious	32	13
Moving & handling people	4	12
Psychological or emotional distress	10	12
Hot substance/surface - contact with	16	11
Machinery/plant/equipment	6	10
Security Incident	14	10
Animal related	11	9
Other	0	8
Assault - Physical - non malicious	14	7
Sports Equipment	6	7
Environmental Incident	16	6
Foreign Object	4	6
Hand Tools	3	5
Absconding	6	4
Choking / Swallowing	3	4
Fall from a height	4	4
Fire	2	4
Asbestos	0	3
Electrical related	5	3
Harmful Substance - contact with/exposed to	3	3
Water Incident - on/in water	2	3
Gas/Steam - release of	3	2
Work Related Ill-Health	1	2

Assault not involving WCC staff (e.g. pupils, customers)	4	1
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Appendix 2

Audit report ratings and action breakdown for directorates

Audit					
Directorate	Communities	Communities	Communities	Resources	People
Service	Forestry	Design Services	Waste	Property, Construction & Engineering	Children & Families
Audit Date	24/06/2019	23/07/2019	16/12/2019	25/11/2019	17/02/2020
Audit Report	Amber	Amber	Amber	N/A	N/A
Actions Agreed	19	16	22	N/A	N/A
P1 Actions	0	0	0	N/A	N/A
P2 Actions	14	11	15	N/A	N/A
P3 Actions	5	4	6	N/A	N/A
Observations	0	1	1	N/A	N/A

Forestry	P1	P2	P3	OB
Overdue	N/A	3	0	0
Days Overdue	N/A	171	N/A	N/A
Forthcoming Overdue (30 Days)	N/A	0	0	0
Completed	N/A	11	5	N/A

Forestry currently have 3 overdue actions. The Lead Auditor has supported the service to complete the agreed actions, specifically with risk assessment creation and safe systems of working. Forestry are awaiting a specialist consultant to support with the remainder of the actions but due to some technical changes in climbing that affected the whole of the Forestry industry the consultant is working with the Arboriculture Association and HSE to help work through the proposed changes which is expected to have a big impact on the industry.

Design Services	P1	P2	P3	OB
Overdue	N/A	2	0	0
Days Overdue	N/A	127	0	0
Forthcoming Overdue (30 Days)	N/A	0	0	0
Completed	N/A	9	4	1

Design Services currently have 2 overdue actions. The Lead Auditor has been supporting the service to complete the agreed actions. The remaining Risk Assessment workshop training action and risk assessment completion action were due to be completed in March 2020 but were delayed due to the COVID19 restrictions.

Waste Services	P1	P2	P3	OB
Overdue	N/A	4	4	1
Days Overdue	N/A	62	2	2
Forthcoming Overdue (30 Days)	N/A	1	0	0
Completed	N/A	1	0	0

Waste Services currently have 9 overdue actions. Some actions have only recently become overdue however they will fall into the audit escalation procedure to try and ensure the actions are completed in a timely manner alongside the actions that have been overdue for some considerable time. The Lead Auditor has been supporting the service to complete the agreed actions, with mandatory training and risk assessment completion and monitoring.

COSHH	P1	P2	P3	OB
Overdue	N/A	3	1	1
Days Overdue	N/A	114	59	86
Forthcoming Overdue (30 Days)	N/A	1	1	0
Completed	N/A	1	0	1

The following key good practice and improvement was identified during the audits: -

- Employee knowledge and participation in wellbeing initiatives has increased
- Services were aware of how to locate corporate Health and Safety information such as the Health and Safety policy
- Health and Safety is discussed during team meetings
- Improved practical compliance for COSHH in terms of storage, labelling, use of personal protective equipment and safe working methods

Report Rating Definitions			
Red	Amber	Yellow	Green
Critical weaknesses in the completion and implementation or operation of policies and standards, that individually or collectively increase the risk of a "major/fundamental" event occurring.	Significant deficiency in the implementation or operation of arrangements and procedures, that individually or collectively increase the risk of a "significant" event occurring.	Minor weaknesses in the implementation of an element of policies or standards, that individually or collectively increase the risk of an "important" event occurring.	Generally acceptable implementation or operation of policies and standards. Some opportunities for improvement may exist.
% of P1's greater than 40% of the total audit score	P1 Finding and (or) % of P2's greater than 40% of the total audit score	No P1 findings and (or) % of P3's greater than 40% of the total audit score	No P1 or P2 findings % of P3's is less than 40% of the total audit

Action Rating	Guidance
Priority1	A critical element of Health, Safety & Wellbeing management is missing. A critical deficiency exists in the implementation of WCC policies and standards Non-compliance with legislation (e.g. mandatory training, risk assessments, workplace equipment)
Priority2	A significant deficiency exists in completion and (or) implementation of arrangements and procedures in place to effectively manage risk. Administrative breach of legislation (e.g. training records, accident/incident reporting, emergency arrangements)
Priority3	Minor or isolated deficiencies in the implementation of an element of policies or standards to meet WCC's expectations (e.g. risk assessments, training, and workplace equipment)
Observation	Items that the auditor wishes to highlight to management for consideration.

Appendix 3 – Employee Assistance Programme Use (April 2019 – March 2020)

Service Type	April 2019 – March 2020
Emotional Support	179
Legal & information	26
Management Support	3
Utilisation rate	4.2%

The standard utilisation benchmark for EAP is 5% of the workforce.

Outcome of helpline calls.

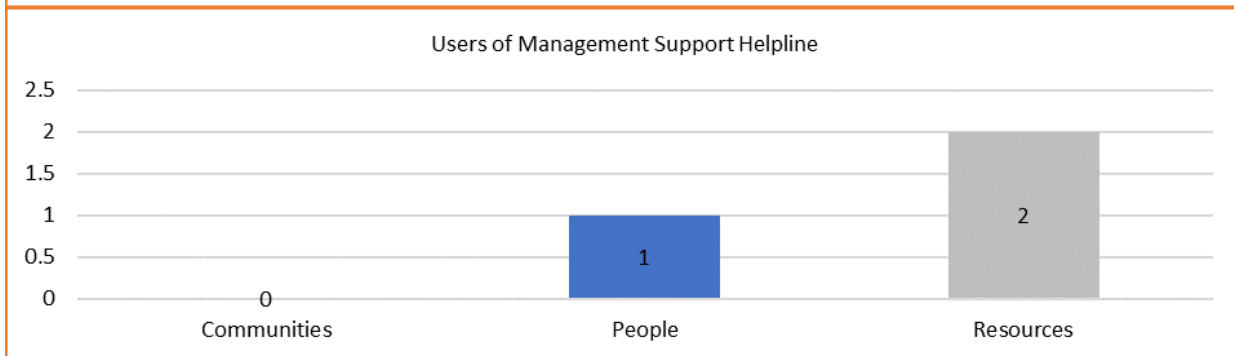
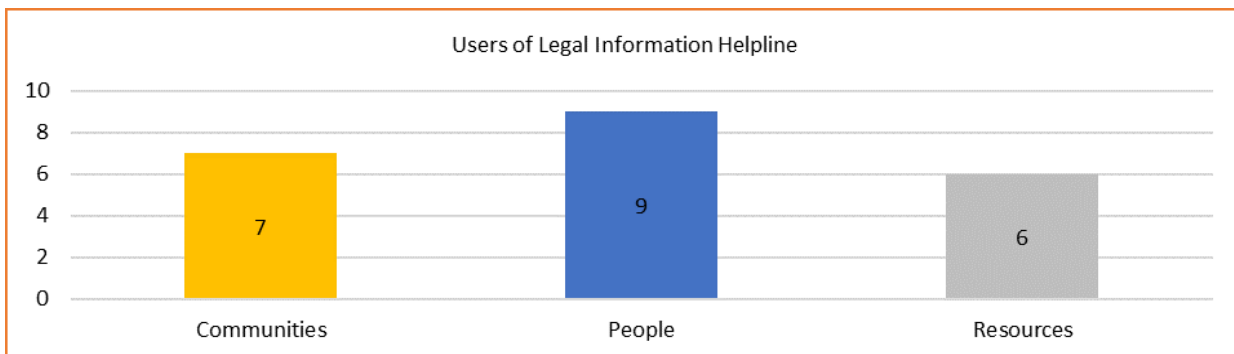
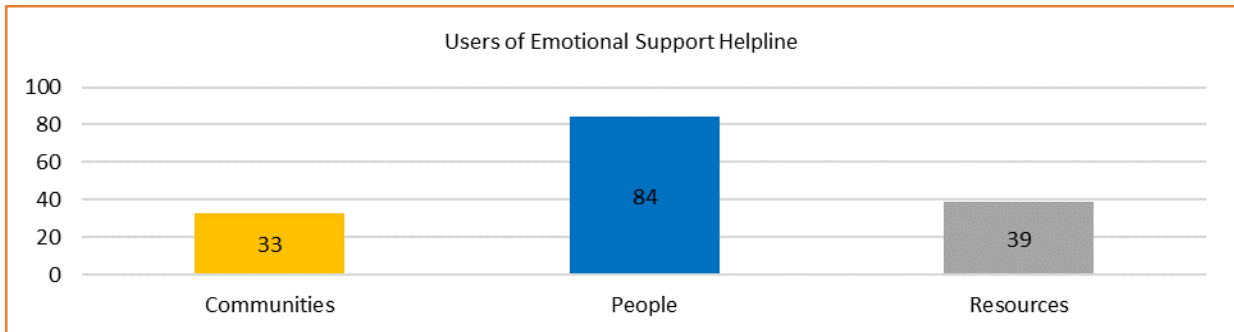
Pathway Placement	April 2019 – March 2020
Referred to Structured Wellbeing Counselling	22
Facilitated Onward referral	10
One Call Solution	120
Referred to guided self help	26

Personal issues presented

Issue	April 2019 – March 2020
Mental Health	56
Family	46
Relationships	25

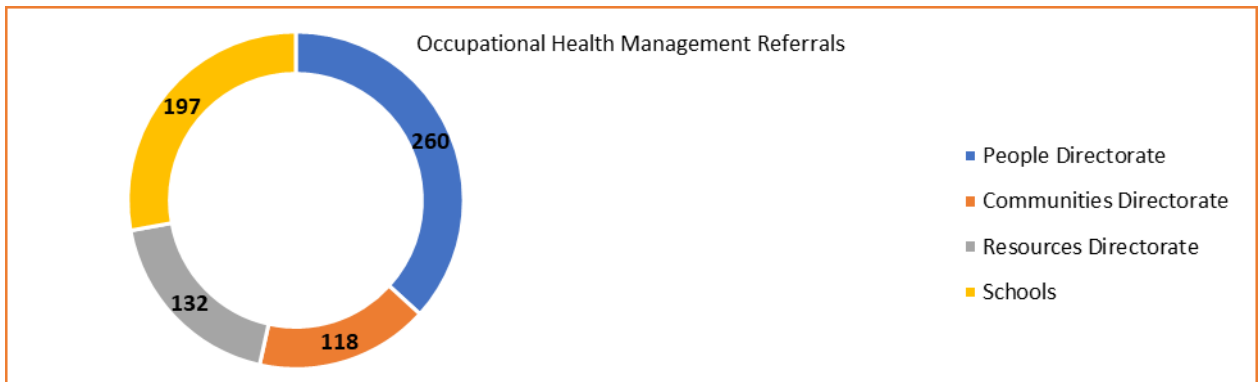
Work Issues presented

Issue	April 2019 –March 2020
Work Stress	38
Mental Health	11
Control over work	9

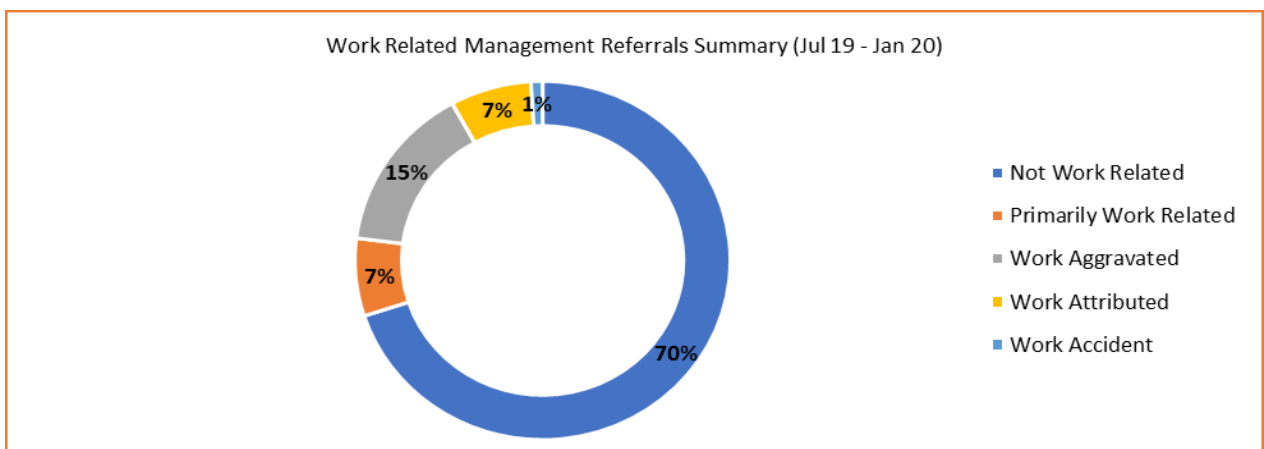
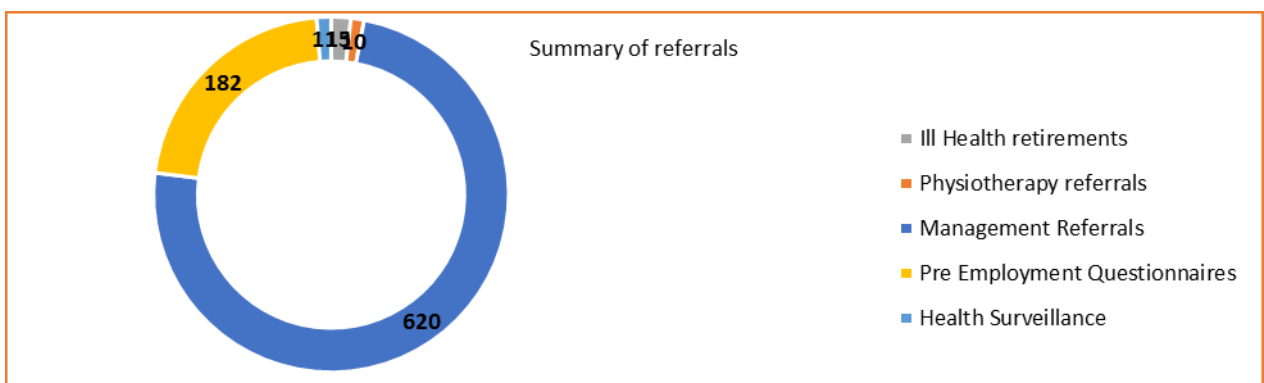


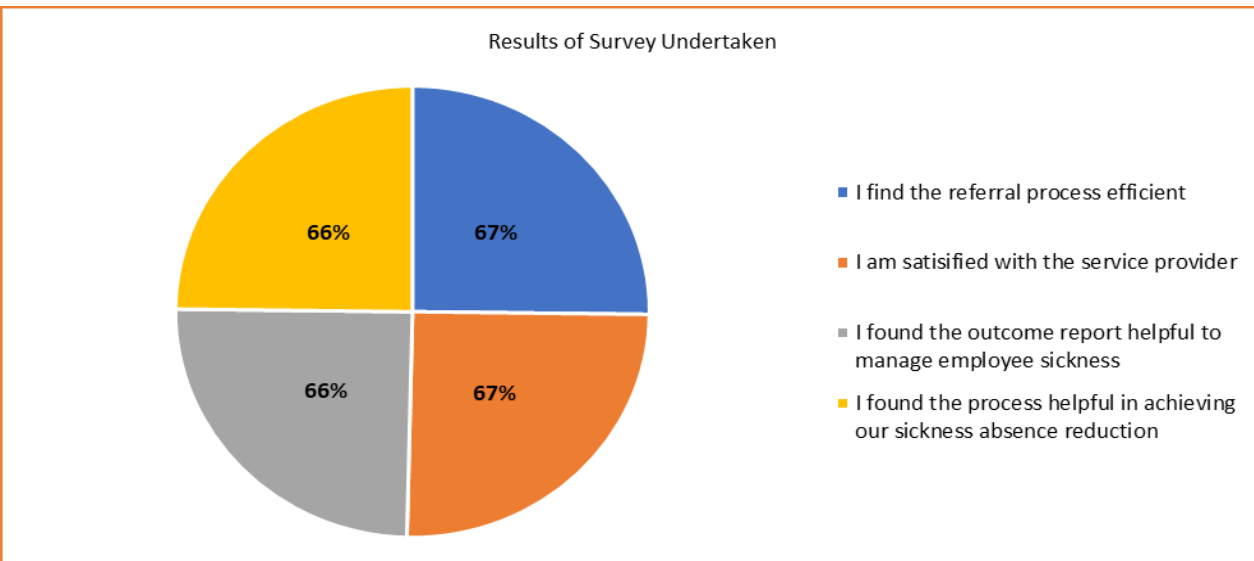
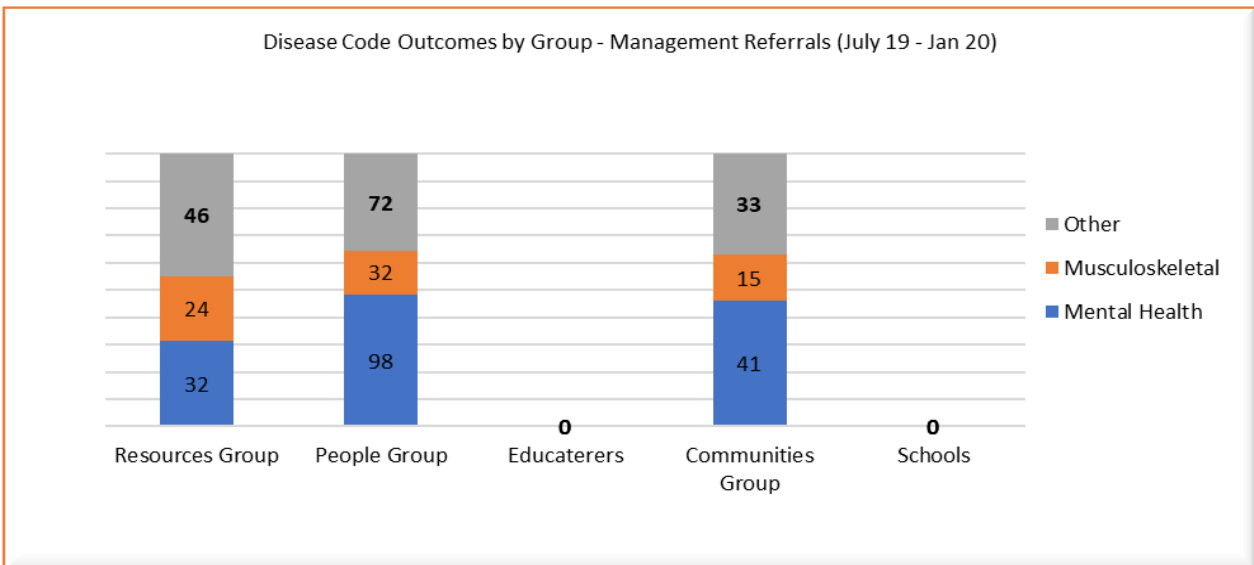
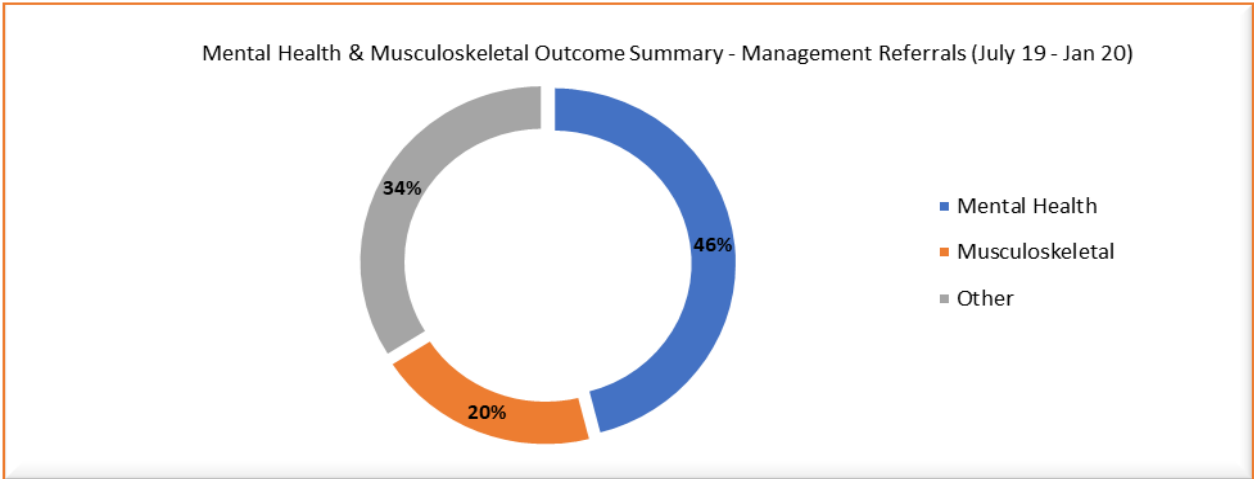
Appendix 4 - Occupational Health – Management Referrals (April 2019 – Jan 2020)

Directorate	2018/9 (9 Months)	2019/20 (10 Months)
People Directorate	181	260
Communities Directorate	79	118
Resources Directorate	79	132
Schools	167	197
Total	506	707

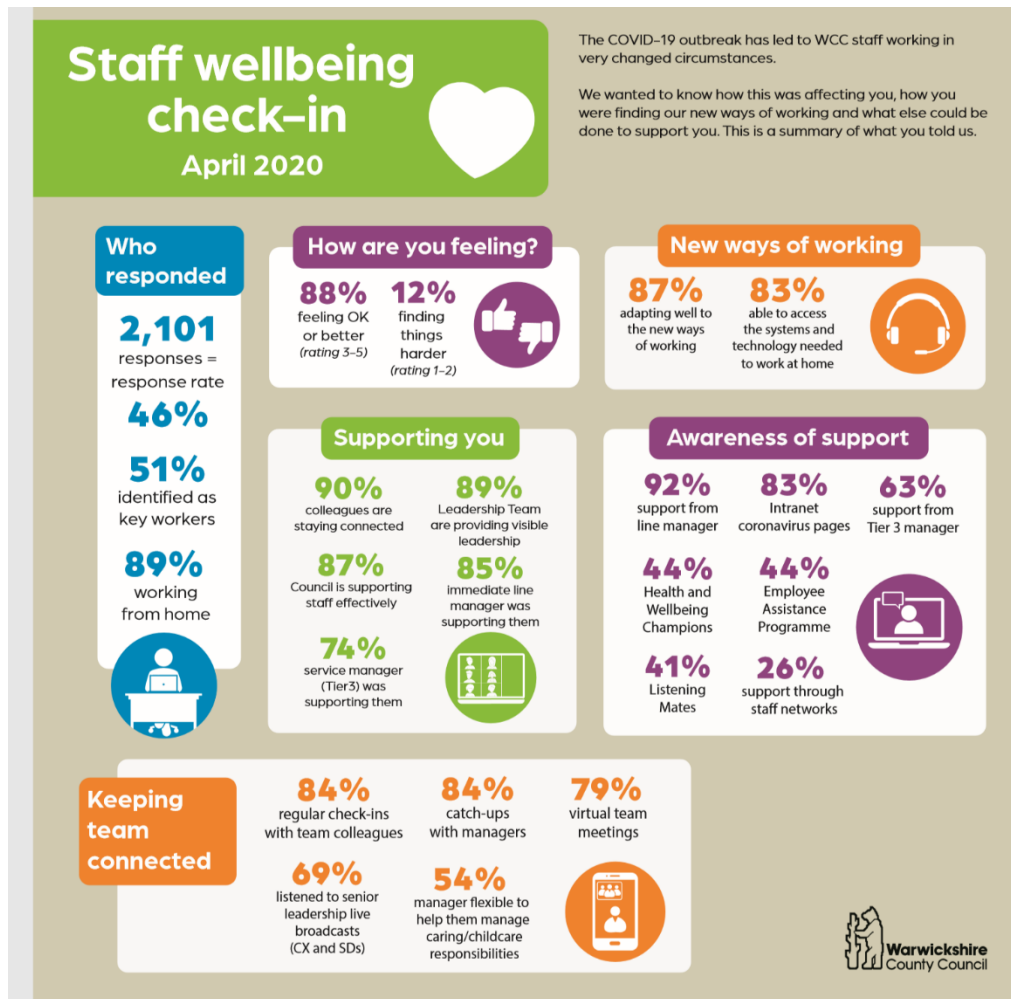


Summary of Referrals	
Ill Health retirements	15
Physiotherapy referrals	10
Management Referrals	620
Pre-Employment Questionnaires	182
Health Surveillance	11





Appendix 5 – Wellbeing Check-in Survey



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Staff and Pensions Committee

8th June 2020

Pensions Administration and Performance Update

Recommendation(s)

The Committee is asked to:

1. Note this report.
2. Approve the adoption of the amended key performance indicators set out at Appendix 2.

1. Executive Summary

- 1.1. This report updates the Committee on key developments affecting pensions administration and the performance of the Pension Administration Service (PAS).

2. Governance Action Plan

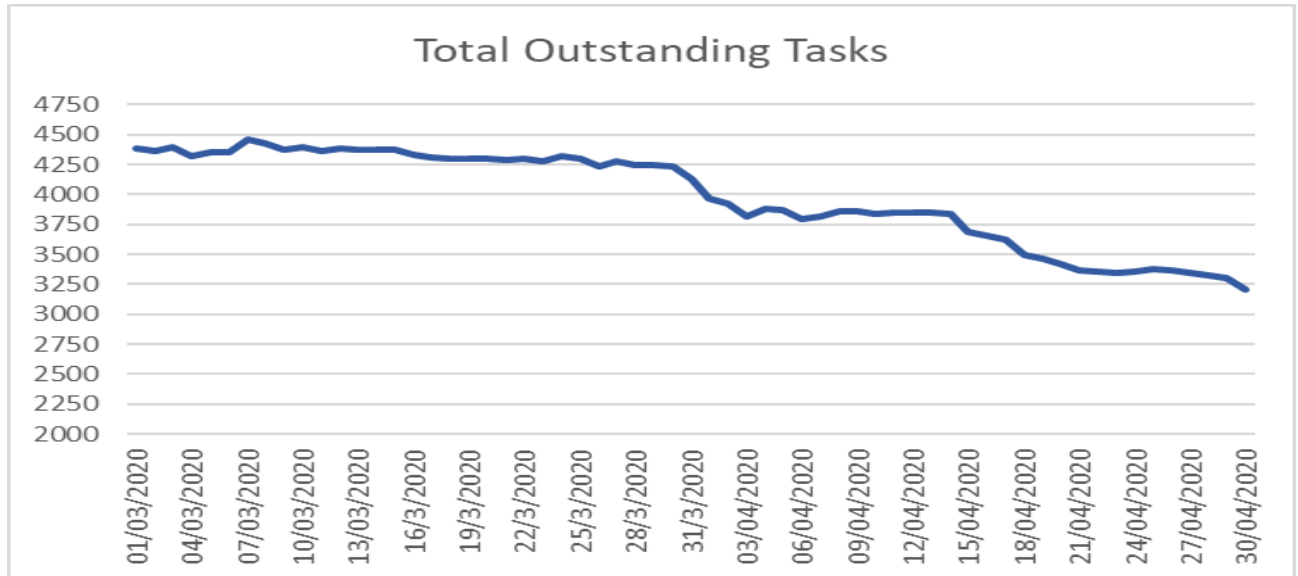
- 2.1. Further progress has been made with the Governance Action Plan. In particular, a further seven actions have been completed. The summary update is enclosed as Appendix 3.

3. Audit

- 3.1. All requirements of the PAS have been completed in good time for the External Audit work being undertaken as part of the closure of the 2019/20 accounts. The team is ready to respond to any further testing queries for the final audit, subject to the impact of COVID-19 on timing.
- 3.2. Field work for an Internal Audit of PAS as part of the 2019/20 Internal Audit Plan has been completed and a draft report issued. The Management Response is in progress and a copy of the final report will be shared with the Committee.
- 3.3. Work in progress to document processes, procedures and controls as part of an Administration Manual will help significantly in addressing the Internal Audit findings.

4. Workloads

4.1. The PAS has been focussing on reducing work volumes and the chart below shows the excellent progress made since the beginning of March. This has been achieved through a combination of more effective procedures and the introduction of productivity targets.



5. Pensions Increase

5.1. The statutory requirement to update all eligible pensions in line with the Pension Increase of 1.7% on 6th April 2020 has been completed. A formal project governance and great collaboration with the payroll team brought significant benefit to the exercise. Of particular note was a new dedicated phone line managed by the customer service team which will capture volumes and call types, record calls and answer queries about Pensions Increase by a specialist team. This will allow us to collate query data for the first time which we plan on using to improve communications with our members.

6. Year End

6.1. Annual Returns from employers are due to be completed and sent back to PAS by the 30 April 2020. PAS then update all employees' records on the Altair pensions system, to include the career average revalued earnings (CARE) and contributions that each individual has paid. The process generates validation queries that then need to be queried and resolved by the employer.

6.2. As at 5 May 2020, 116 employers have submitted an Annual Return out of 193 total expected.

- 6.3. Of the 116 returns received, 40 have been uploaded and completed on Altair. The follow-on stage from employer submissions is validation checks. This creates many queries to resolve with employers over the integrity of the data submitted.
- 6.4. Delays with submission of data and any subsequent resolution of queries increases the risk of not producing Annual Benefit Statements by the statutory deadline of 31 August 2020 and Pensions Savings Statements by 6 October 2020. The critical path for the project requires data updates to be completed by the 18 July 2020 to ensure Annual Benefit Statements are produced.
- 6.5. Delays due to COVID-19 increase the risk that the Fund will not be in a position to provide Annual Benefit Statements and Pensions Savings Statements by the regulatory deadlines. The timeline for production of Annual Benefit Statements is shown in Appendix 1.
- 6.6. PAS Officers have been proactively engaging with the employers and their suppliers prior to, and after, the 30 April deadline. For remaining outstanding returns, a follow up communication was sent on 7 May with direct phone calls planned for the week of 11 May. Any remaining returns will be escalated to the Assistant Director of Finance to connect with peers at the outstanding employers.

7. Recruitment

- 7.1. The Pensions Administration Team consists of 23 members of staff. Since the last report, investment in the team has meant the recruitment of one additional Team Lead, and four Pension Assistants. These changes will improve the service resilience and performance for the Fund to achieve the objectives stated in the Administration Strategy.
- 7.2. The skills and experience of individual teams have also been analysed, ensuring that appropriate skills and knowledge are distributed optimally.
- 7.3. There has been a positive impact on the amount of workload completed by the team since January 2020 as our daily reporting figures have progressively decreased from 4937 to 3176.
- 7.4. Due to COVID-19 lockdown, the PAS responded superbly with mobilisation to working remotely and process improvements to maintain the service to our members and employers and in particular, ensure payments are made on time.
- 7.5. Historic processes which involved paper and post have been converted to digital processes to maintain and improve our service to customers. The team are now fully able to work and communicate electronically. Whilst a paper trail still exists, over time we intend to keep the new digital ways of working as our primary method of exchange and expect use of paper and post to decline.

7.6. Focused effort has been invested in the documentation and training of our process relating to death benefits, in anticipation of a rise in the number of death cases we receive.

7.7. Overall the position of the Pensions Administration Team has gone from strength to strength over the past few months, the team have taken on new challenges and there is now a positive sense of confidence and commitment from the team.

8. Training

8.1. Training within the Pensions Administration Team is now a firmly established process as part of building strength in depth and resilience. Training has been accessed and delivered in various ways due to the current working conditions.

8.2. All members of the PAS have completed mandatory e-learning courses during the last couple of months as the foundation for future learning. The courses completed are Data Protection, Anti-Fraud, Customer Service, Information Security, and Complaints Handling. All progress has been verified by their line managers.

8.3. In addition, a further 22 modules of pensions technical training have been delivered on a variety of LGPS benefits topics, and process guides have been created to use as training tools for new members of staff. This has been a great success for the PAS and has encouraged consistency across all teams.

8.4. Training plans have been designed to ensure all new members of staff are trained on all processes within pension services. Applying this approach to train staff members has encouraged the team to work collaboratively.

9. Key Performance Indicators

9.1. The table below shows the full year performance against the agreed indicators in 2019/20.

Performance Indicator	Target	2019/20 full year	Comments
Retirements Lump Sums paid within 30 days of retirement	100%	32.34%	Timing of employer notification is the single biggest cause for this result.
Retirements Lump Sums paid within	100%	98.56%	This excellent result evidences

10 days of receiving relevant paperwork			the comment above.
Death grants paid 10 days of receiving paperwork	100%	85.27%	Results are skewed due to relatively low volumes.
Refunds processed within 10 days of receiving paperwork	100%	95.27%	
Transfers paid within 10 days of receiving paperwork	100%	69.48%	89.13% for the last 4 months
Deferred benefits calculated and notified within 10 days of receiving paperwork	100%	88.44%	
Scheme employer contributions received by 19th of the month following deduction	100%	90%	The Strategic plan to implement IConnect will maintain and improve these KPIs
Scheme employer monthly returns received by 19th of the month following deduction	100%	85%	

10. New Key Performance Indicators

10.1. The current KPIs were agreed to ensure focus on priority areas of service. With actions completed and progress made, the KPIs have been reviewed and assessed against prevailing needs and current industry standard KPIs. A number of differences and gaps have been identified, and in summary the industry standard KPIs are the most appropriate measures for the Fund to adopt. The Committee is therefore asked to approve the adoption of the amended KPIs set out in Appendix 2.

10.2. Subject to the Committee's approval, the PAS is confident it is able to report consistently against the industry standard KPIs ongoing and will adopt and report on them from April 2020. The first set of performance figures will

be available for the Local Pensions Board on 21 July 2020 and for the Staff and Pensions Committee on 14 September 2020.

- 10.3. Appendix 2 shows the propose new KPIs to be reported at future meetings. It should be noted that for some processes, the industry standard target is above current performance and the service will advise a trajectory for the performance to reach the target over a realistic timeline.
- 10.4. There are two additional KPIs to the industry standards: one being how many days past retirement date on average it takes for a member to be paid their lump sum; and the second being payment of a death grant within 10 days of receiving all documentation. The PAS feel these are important measures of member experience that the Fund will be interested in.
- 10.5. For all regulatory performance indicators, the target for service level would be 100% and for all non-regulatory measures, the target for service would be 95%. The reporting period for KPIs will be changed to monthly and reporting will show trends as experience data accumulates.

11. Annual Benefit Statements

- 11.1. Fortnightly, constructive engagement with tPR happens to progress the remaining Annual Benefit Statements from 2019. As at 1st May 2020, 91% of statements have been issued. Of the remaining 9% (3,093), 92% (2,846) cannot be issued until an up to date address is found. Appointment of a third-party tracing agency is in progress.
- 11.2. The statutory requirement of Annual Benefit Statement 2020 project is currently underway. The first batch of Annual Benefit Statements to deferred members is planned for the 2nd June 2020 and the active Annual Statements will be sent to members on the 14th August 2020. The PAS is hoping to use the tracing results to improve the total statements issued on 14th August 2020.
- 11.3. A formal project has been established, supported by senior officers as an action to improve the governance of this regulatory requirement.
- 11.4. The risk of delay with data submissions from employers due to COVID-19 increases the likelihood that Annual Benefit Statements will not be sent to scheme members by the 31 August regulatory deadline.
- 11.5. The service is also taking the opportunity to use the communications as its first notice to members that the service will become increasingly a digital service.

12. Data Quality

- 12.1. Following the industry-wide cessation of contracting-out in April 2016, the Fund has been liaising with HMRC to reconcile membership information. This is commonly referred to as “GMP Reconciliation”. It has been a slow and long project for most UK pension funds. HMRC have sent the final data cut for the GMP Reconciliation and work can now progress with our Actuary, Hymans, who have been supporting us through this project.
- 12.2. PAS is currently in the process of reconciling pensioner membership and benefits information between pension and payroll systems. Results will be presented at a future meeting.
- 12.3. Work is in progress to analyse data quality against the Pensions Regulator Common and Scheme Specific recommendations. Results will be presented at a future meeting.

13. Breaches

- 13.1. Annual Benefits Statements are to be issued by 31 August each year to eligible members. This is a Regulatory deadline and the Fund reported a breach of the 2019 deadline to the Pensions Regulator. Progress resolving this breach has been noted in this report in 12.1.
- 13.2. A new Breaches Policy was approved by Staff and Pensions Committee at its meeting in December 2019. The PAS has extended the data it captures to enable reporting against the new Breaches policy. The starting point for data is January 2020.
- 13.3. All of the recorded breaches from January 2020 relate to the late submission of data or contributions by employers. Where an employer submits more than one week late on more than three occasions in one year, or more than five weeks late on one occasion, then a Green breach is escalated to Amber.
- 13.4. The table below summarises breaches to date in 2020:

	Amber Breach	Green Breach	No Breach	Total
Number of Employers	81	12	100	193

- 13.5. In accordance with the Breaches Policy, the Amber breach employers have been escalated to the Assistant Director of Finance who has sent communications to employer contacts in order to support resolution of the issues.

14. Employer update

- 14.1. Organisational change across the employers within the Fund continues to be busy and frequently changing. The points below summarise changes.
- 14.2. Kingsway School has amended its academy conversion date to 1st September 2020 and Lillington School has amended its date to 1st July 2020.
- 14.3. Wootton Wawen and All Saints schools are proposing to convert on 1st September 2020 but this is not yet confirmed.
- 14.4. An employer may apply to the Fund with a potential backdated notice to 1 January 2020. The application is progress, including getting the Admission Agreement in place. Due to potential commercial sensitivity, the employer is not named here.

15. Financial implications

- 15.1. There are no financial implications for the Committee to note, additional to those included in the body of the report.

16. Environmental Implications

- 16.1. There are no environment implications for the Committee to note within this report.

Timescales associated with the decision and next steps

The Committee is asked to approve the adoption of the amended key performance indicators set out at Appendix 2.

Appendices

- 1. Appendix 1 – End of Year and Annual Benefit Statement timeline
- 2. Appendix 2 – Template for new KPIs from April 2020
- 3. Appendix 3 – Governance Action Plan Summary

Background Papers

No background papers.

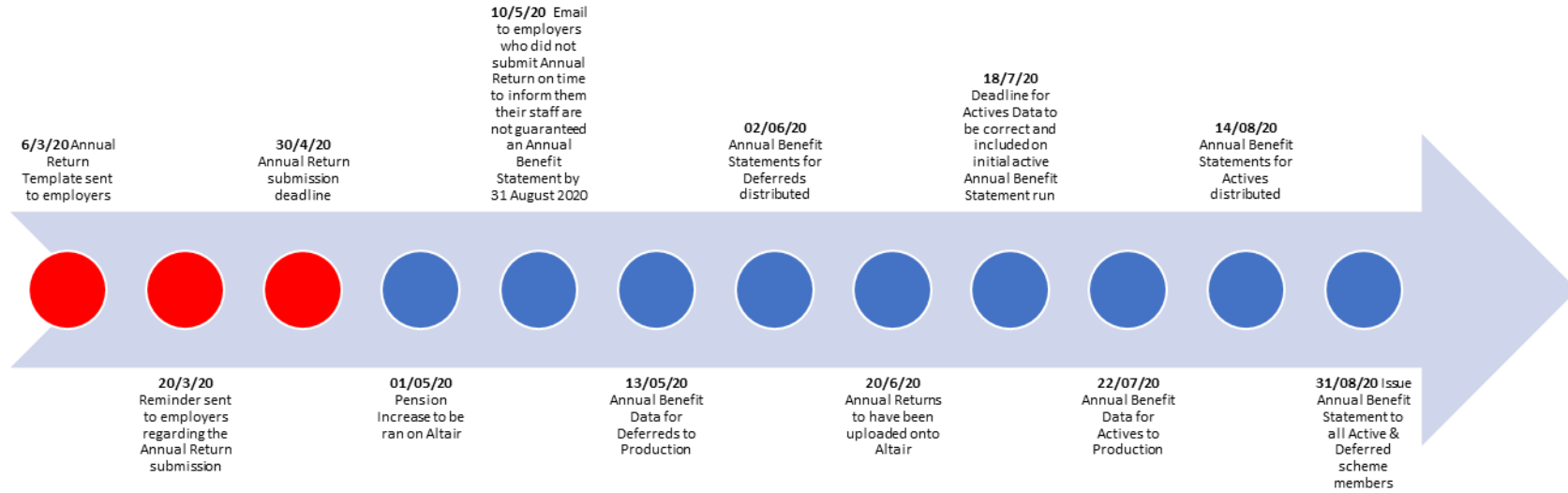
	Name	Contact Information
Report Author	Andrew Marson	andrewmarson@warwickshire.gov.uk
Assistant Director	Andrew Felton	andrewfelton@warwickshire.gov.uk
Lead Director	Strategic Director for Resources	Robpowell@warwickshire.gov.uk
Lead Member	Portfolio Holder for Finance and Property	peterbutlin@warwickshire.gov.uk

The report was circulated to the following members prior to publication:

Local Member(s): None

Other members: Councillors Kaur, Gifford and Dirveiks

Appendix 1 – End of Year and Annual Benefit Statement timeline



Scope at 31 March 2020:
 196 Employers
 16,000+ Actives
 18,000+ Deffereds



Appendix 2 – Template for new KPIs from April 2020

Key Performance Indicator	Fund Target (95% service level)	Legal Target (100% service level)
Letter Detailing transfer in quote	10 days	2 months
Letter detailing transfer out quote	10 days	2 months
Process and pay a refund	10 days	2 months
Letter notifying estimate of retirement benefits (Active)	15 days	2 months
Letter notifying actual retirement benefits (Active)	15 days	2 months
Process and pay lump sum (Active)	10 days	2 months
Process and pay lump sum (Deferred)	10 days	2 months
Initial letter notifying death of a member	5 days	2 months
Letter notifying amount of dependents benefits	10 days	2 months
Divorce quote letter	45 days	3 months
Divorce settlement letter	15 days	3 months
Send notification of joining scheme to member	40 days	2 months
Deferred benefits into payment	15 days	2 months
Calculate and notify deferred benefits.	30 days	2 months
Average days from retirement to payment of lump sum.	Measure member experience	Measure member experience

Notes:

1. Days are working days only.
2. Payments relate to sending payment, not receipt in member account.
3. Service Levels commence when PAS have full and accurate information to process the case.

Appendix 3 – Governance Action Plan Summary – Update @ 5th May 2020

The Pensions Regulator Code of Practice 14	Complete	Red	Amber	Green	Notes
Knowledge & Understanding	5	1	1	0	Training logs being maintained and training opportunities circulated to Board Members. 2 training days scheduled for 2020 (will need to be rescheduled due to Covid19). Training Needs Analysis underway and will inform content of training days. Training for new Board member can't be completed until they are appointed.
Conflicts of Interest	1	0	0	0	LPB Policy approved at SPC March 2020
Publishing Information	0	2	0	0	LPB Terms of Reference review was deferred to July 2020 meeting and will move to completed once approved by Council. ESG Policy was approved by PFISC in March 2020.
Managing Risks	3	1	0	3	Risk register now being reviewed at each LPB meeting. Managed handover of work to permanent Pensions and Investment Manager and Pensions Delivery Lead.
Record Keeping	7	3	5	1	Approval of Admin Strategy and subsequent training for Employers will help to ensure they understand and are carrying out their roles and responsibilities. Project Full Business Case submitted for approval. Aim is to roll out in 3 phases starting in October 2020.
Maintaining Contributions	9	0	1	1	New Admin Strategy and subsequent training to communicate and improve performance of employer obligations, roles and responsibilities.
Providing Information to Members	0	0	0	0	Governance requirements being met.
Internal Dispute Resolution	0	0	0	0	Governance requirements being met.
Reporting Breaches	7	1	0	0	Breaches Policy in place and breaches log maintained and reviewed regularly. Training completed for Pensions Admin Staff. Employers to be reminded of their responsibilities regarding breaches via new Admin Strategy and related training. Training/workshops have been delivered by Actuary to employees at risk of exceeding allowance thresholds, and project plan is in place for managing 2020 Annual Allowance process.
Developing Areas	2	0	0	0	RI/ESG/Climate Change policy approved at PIFSC March 2020
	34	8	7	5	
Total Actions				54	

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Staff & Pensions Committee

Admissions and Termination Policy

8 June 2020

Recommendation(s)

- 1.1 That the Committee approve the amended Admissions and Termination Policy.

2. Executive Summary

- 2.1 Following an amendment to the Local Government Pension Scheme Regulations, the Admissions and Termination policy (the policy) required amendment. The regulations introduce discretions as to how a local authority pension fund will determine if an exit credit is due to a scheme employer leaving the Fund.
- 2.2 Section 6 (“Termination”) of the attached Admissions and Termination Policy (Appendix 1) has been amended to reflect these changes.

3. Financial Implications

- 3.1 The amending of the Policy to reflect the changes to the Local Government Pension Scheme Regulations concerning exit credits, will ensure the pension fund retains enough assets in the Fund to cover possible unfunded liabilities when a Scheme Employer exits.

4. Environmental Implications

None

5. Supporting Information

- 5.1 The Local Government Pension Scheme (Amendment) Regulations 2020 (the regulations), came into force on 20 March 2020 and were retrospective to 14 May 2018.
- 5.2 The regulations specifically refer to exit credits which may arise when a scheme employer exits a local authority pension fund.
- 5.3 The regulations were issued following a period of consultation on wider amendments and it is anticipated that further amending regulations regarding

the introduction of Fair Deal (to replace the existing Directions Order) for LGPS members TUPE'd and whether Colleges of FE and Sixth Form colleges have to offer membership of the LGPS, will be issued in the future.

- 5.4 The regulations introduce discretions as to how a local authority pension fund will determine if an exit credit is due to a scheme employer leaving the Fund.
- 5.5 The Fund's Admissions and Termination Policy has been revised to show how this discretion will be exercised. Briefly:
- No exit credit will be paid to an admission body which joined the Fund before 14 May 2018 or where the agreement was rolled over / extended on the same terms which applied on joining the Fund.
 - No exit credit will be paid where the admission body participates in the Fund by way of a pass-through arrangement.
 - The Fund will pay an exit credit in line with contractual or risk sharing arrangements which specifically cover the ownership of exit credits or surpluses.
 - An exit credit will not normally be paid to an existing scheduled (e.g. an academy) or resolution body (e.g. a parish council). Generally, if an academy ceases and transfers to another academy or multiple academy trust (MAT), the assets and liabilities for that academy transfer to the new academy or MAT. If, however, an academy ceased without transfer it may be appropriate to pay an exit credit. Parish and Town Councils are pooled for actuarial purposes but if a resolution body withdrew from the pool and exited the Fund an exit payment may be payable.

6. Timescales associated with the decision and next steps

- 6.1 Following approval by the Committee the amended Admissions and Termination policy will be made available on the Fund's website.

Appendices

1. Admissions and Termination Policy

Background Papers

None

	Name	Contact Information
Report Author	Neil Buxton	neilbuxton@warwickshire.gov.uk
Assistant Director	Andrew Felton	andrewfelton@warwickshre.gov.uk
Strategic Director	Rob Powell	robpowell@warwickshire.gov.uk
Lead Member	Peter Butlin	peterbutlin@warwickshire.gov.uk

The report was circulated to the following members prior to publication:

Local Member(s): None

Other members

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Warwickshire Pension Fund

Admissions and Termination Policy

Version: 2

Date Issue: March 2020

Reference: WPF-ATP

Team: Warwickshire Pension Fund

Protective Marking: Public

Warwickshire Pension Fund - Admissions and Termination Policy

1 Introduction

- 1.1 Warwickshire County Council is the administering authority for the Warwickshire LGPS Pension Fund (the "Pension Fund").
- 1.2 The administering authority is responsible for determining who may be admitted as a 'scheme employer' in the Pension Fund.
- 1.3 The Pension Fund is governed by legislation, mainly the Local Government Pension Scheme Regulations 2013, as amended from time to time (the "Regulations"). The Regulations set out criteria for admission to the Local Government Pension Scheme, which also afford the Pension Fund some discretion.
- 1.4 This policy seeks to clarify the basis on which the Pension Fund allows admission and may reject, withdraw or terminate admission, having regard to the Regulations and the discretion afforded under them.

2 Scheme Employers

2.1 Scheduled Bodies

- 2.1.1 The Regulations set out certain employers who have an automatic right to participate as 'scheme employers' within the Pension Fund. These bodies will still need to make an application to the administering authority but provided the requirements of the Regulations are met, the body will be admitted and their employees will have an automatic right to join. The administering authority refers to these as "Scheduled Bodies".
- 2.1.2 Those bodies are listed in Schedule 2 of the Regulations within Parts 1, 2 and the second column of the table in Part 4, which are reproduced at Annex A of this policy.
- 2.1.3 Without prejudice to paragraph 2.1.1, the administering authority may ask a Scheduled Body for evidence of their internal authority to join the Pension Fund, for example, any resolution that has been passed in relation to LGPS membership or minutes of a meeting granting approval (if applicable).

2.2 Admission Bodies

- 2.2.1 In addition to those bodies listed in the Regulations, the administering authority may make an admission agreement with other bodies who meet certain criteria. These criteria are set out in Paragraph 1 of Part 3 of Schedule 2 of the Regulations and are reproduced in Annex B of this policy.
- 2.2.2 These bodies must make an application for admission to the Pension Fund, which will be determined in accordance with this policy. If the application is accepted then the body will be admitted to the Pension Fund and must enter into an admission agreement to formalise the terms on which they are entitled to participate within the Pension Fund.
- 2.2.3 Admission bodies are subject to the requirements of the Regulations and must follow them in order to participate in the Pension Fund.

Warwickshire Pension Fund - Admissions and Termination Policy

2.3 Community Bodies

2.3.1 The bodies that meet the criteria as set out in (a), (b), (c) and (e) of Paragraph 1 of Part 3 to Schedule 2 are referred to by the administering authority as “Community Bodies”. The administering authority does not have to accept an application from a Community Body, even if they meet the criteria within the Regulations, although it will normally seek to do so provided that such admission does not pose a risk to the Pension Fund.

2.3.2 In addition to the legislative requirements, the following matters will be considered in relation to whether or not a Community Body will be admitted:

- How many potential scheme members there will be – the administering authority will normally expect there to be at least 10 potential members
- Whether the body will receive direct funding from a Scheduled Body and what limitations on that funding there may be
- Whether there is a Scheduled Body that is sponsoring the prospective Community Body – the administering authority would normally expect a Scheduled Body to sponsor the application and to guarantee in writing the pension liabilities of the prospective Community Body should they be admitted
- The financial viability of the prospective Community Body – the administering authority may reject an application if it considers that admitting the body may pose financial risk to the Pension Fund

2.4 Transferee Bodies

2.4.1 Those bodies that meet the criteria set out in (d) of Paragraph 1 are referred to by the administering authority as “Transferee Bodies”. These are bodies that are providing or will provide a service or assets in connection with the exercise of a function of a Scheduled Body as a result of the transfer of the service or assets by means of a contract or other arrangement.

2.4.2 For the purposes of this paragraph 2.4.2, the administering authority considers that it will normally be the “relevant administering authority” where the Scheduled Body that the Transferee Body is performing the function on behalf of (the “Letting Employer”) is located within Warwickshire. Where the administering authority is the relevant administering authority it must accept an application from a Transferee Body where that body has undertaken to comply with the Regulations.

2.4.3 There are specific requirements within the Regulations that apply to Transferee Bodies only, including the following:

- The Letting Employer must be a party to the admission agreement
- If the Transferee Body is performing more than one contract, then the Transferee Body must enter into an admission agreement for each one
- The Transferee Body must carry out, to the satisfaction of the administering authority and the Letting Employer, an assessment of the level of risk arising on premature termination and if required by the administering authority, enter into a bond agreement or secure a guarantee. In practice the administering authority will arrange for the assessment to be carried out by its independent actuary and will recharge

Warwickshire Pension Fund - Admissions and Termination Policy

the costs to the Employing Body who can recharge the costs to the Transferee Body, as appropriate.

(Unless there are exceptional circumstances, the administering authority will always expect there to be a bond or guarantee in place. The administering authority's strong preference is a bond (as this is a securer form of surety) but in limited circumstances the administering authority may at its sole discretion accept a guarantee)

2.4.4 It is also a requirement of the Regulations that an admission agreement with a Transferee Body includes the following provisions:

- That only employees that are employed in connection with the service for the Letting Employer are entitled to be members of the Pension Fund
- The details of the contract with the Letting Employer
- An agreement that the Letting Employer may set off against any sums due to the Transferee Body, any sums due to the Pension Fund under the Regulations
- A requirement that the Transferee Body keeps under review, to the satisfaction of the administering authority and the Letting Employer, its assessment of the level of risk
- A requirement that copies of notifications that are due to be provided to the administering authority are provided to the Letting Employer also
- That a copy of the admission agreement be available for inspection at the Letting Employer's office

2.4.5 The administering authority expects to be advised of transfers well in advance of the transfer taking place and where possible, be provided with an accurate list of those employees transferring.

3 The Application Process

3.1 A body that wishes to be admitted to the Pension Fund must provide all information requested by the administering authority in order for its application to be considered fully.

3.2 Officers on behalf of the administering authority will then prepare a report for consideration by the relevant committee at its next available meeting based on the information provided. It is the responsibility of the applicant body (and/or the Letting Employer in relation to a contract transfer) to ensure that the application is considered prior to the date admission is required and therefore those bodies should liaise with the administering authority in relation to upcoming meeting dates when considering submitting an application.

3.3 The applicant body (and the Letting Employer in the case of a Transferee Body) will be informed of the outcome of the application after the meeting where the decision is made.

3.4 Where the application is successful, the admission body (and/or the Letting Employer in the case of a Transferee Body) shall be responsible for providing the administering authority with a list of those employees that are to be admitted to the Pension Fund. The administering authority will specify the level of information required for administration of the process. This information will need to be provided within sufficient time for the Pension Fund's actuary to calculate the contribution rate and

Warwickshire Pension Fund - Admissions and Termination Policy

bond amount prior to admission. The cost of the actuary's report will be charged to the Letting Employer, in the case of a Transferee Body or the admission body/Scheduled Body, as appropriate, in other cases.

- 3.5 The administering authority will expect the admission body to pay the contribution rate and secure the bond amount as determined by the actuary. In the case of Transferee Bodies, the administering authority may consider risk sharing arrangements between the Transferee Body and the relevant Letting Employer provided that the Pension Fund's interests are protected. The administering authority shall have final determination over the level of bond required and any risk sharing arrangements.
- 3.6 The administering authority may consider proposals to pool employers for actuarial purposes. If an applicant body or existing admission body wishes to join an existing pool or create a new pool with similar employers, then it should notify the administering authority. Prior to agreeing to any proposals, the administering authority will seek actuarial advice. In the event that such proposals are agreed, the contribution rates for those employers will be set at the same level (if expressed as a percentage of pay) based on their shared liabilities. Where admission bodies have been pooled and a particular admission body exits the Pension Fund it will still be dealt with in accordance with paragraph 6 of this policy. For information on the current pools that applicant bodies or admission bodies can join, please contact the Pension Fund.

4 The Admission Agreement

- 4.1 The administering authority has a standard form of admission agreement that it will expect admission bodies to enter into prior to being admitted to the Pension Fund (the current draft is appended to this policy at Annex C or D, as appropriate). This standard form incorporates the requirements within the Regulations in relation to matters that should be included in admission agreements (including those that specifically relate to Transferee Bodies as referred to at 2.4.4 above where applicable).
- 4.2 The bond agreement should normally be entered into at the same time as the admission agreement; however, there may be exceptional circumstances whereby the administering authority will permit the bond agreement to be entered into after the transfer date provided that the admission agreement is clear that a bond must be entered into.
- 4.3 In the event that the actuary has been unable to calculate the contribution rate (e.g. as a result of information not being provided in time), the admission agreement will not normally be entered into until the rate has been calculated. In such circumstances or where the admission agreement has not been entered into for any other reason, the admission body may be permitted to still participate in the Pension Fund pending the admission agreement being entered into (at the sole discretion of the administering authority), in which case its admission will be governed by the terms of the standard form of admission agreement as appended to this policy at Annex C or D, as appropriate, and the admission body is deemed to be bound by such terms for the period for which it participates in the Pension Fund. Alternatively, the administering authority may require the employees to be transferred to the associated Scheme Employer for LGPS membership purposes and that employer shall be responsible for all contributions up to the point at which the employees' pension liabilities are able to transfer to the new admission body. The administering

Warwickshire Pension Fund - Admissions and Termination Policy

authority will either specify a contribution rate to be paid by the admission body or Scheme Employer in the intervening period until the admission body is in a position to participate in the Pension Fund and pay its own contribution rate or, in the case of a rate yet to be determined, shall require the admission body to pay the contributions retrospectively once the rate has been calculated.

5 Participation in the Pension Fund

- 5.1 It is a condition of admission to the Pension Fund that scheme employers operate in a manner that respects its obligations in relation to pension liabilities, including but not limited to, paying contributions in accordance with the Pension Fund's actuary's assessment.
- 5.2 In accordance with the Regulations, the actuary on behalf of the Pension Fund will carry out an assessment every 3 years and will set the level of contributions required by each scheme employer. Those contributions may be set as a percentage of pay or combination of a percentage of pay and a cash sum. Whilst the administering authority may consider representations made by any scheme employer in relation to the amount of their contributions, the administering authority's decision as to the amount (based on actuarial advice) is final.
- 5.3 In the event that a scheme employer disputes the level of contributions required, the administering authority will endeavour to resolve the dispute informally, however, where such resolution is not possible, the administering authority will refer such matters to the relevant regulator (as appropriate), in order to protect the interests of members and other scheme employers within the Pension Fund.
- 5.4 Although the level of contributions required for individual employers will be set on a case by case basis, the following principles will be taken into account in relation to specific types of bodies:
- 5.4.1 Academies – where an academy school participating in the Pension Fund is part of a Multi-Academy Trust that already has other academy schools in the Pension Fund, all academy schools within that trust will pay the same contribution rate. In the event that the academy is not part of a Multi-Academy Trust or it is part of a Multi-Academy Trust outside of Warwickshire, the contribution rate will be calculated in accordance with the Pension Fund's Funding Strategy Statement (FSS).
- 5.4.2 Free Schools – where a free school is participating in the Pension Fund, its contribution rate will be calculated in accordance with the FSS.
- 5.4.3 Parish and Town Councils – where a parish or town council is participating in the Pension Fund, it may have the option to join a pool of parish and town councils and in which case those pooling arrangements will determine the contribution rate (see paragraph 3.6 above).
- 5.4.4 Community Bodies – contribution rates will be bespoke to the individual employer.
- 5.4.5 Transferee Bodies – these bodies will be encouraged to adopt a pass-through contribution rate, where possible, which shall be equal to the primary rate of the Letting Employer but shall not give rise to either an exit payment or exit credit (see paragraph 3.5 above in relation to risk sharing). This approach provides certainty to the Transferee Body from the outset and simplifies exit arrangements. It is particularly suitable for smaller short-term contracts, for example, a catering contract let by a school. It may not be suitable for larger contracts where the contractor is expected to carry more risk and in such circumstances, Letting Employers may prefer

Warwickshire Pension Fund - Admissions and Termination Policy

not to share risk with the contractor by allowing them to adopt a pass-through contribution rate.

6 Termination

- 6.1 The admission agreement will normally specify the circumstances by which an admission body may exit (or be required to exit) the Pension Fund and become an “exiting employer”. Without prejudice to such terms, an administering authority may determine that an admission body has ceased to be a scheme employer within the Pension Fund where it no longer meets the criteria on which it was originally admitted.
- 6.2 It is advantageous to both the Pension Fund and the exiting employer to be able to plan for any proposed exit in order to prevent a large exit payment or exit credit (or ideally any exit payment or exit credit). If the exiting employer gives advanced notice of its participation in the Pension Fund ceasing, the administering authority will consider (in conjunction with the relevant Letting Employer if it is a Transferee Body) whether it is appropriate to obtain a revised assessment from its actuary to adjust the exiting employer’s contributions with the aim of there being no surplus or deficit by the point at which the exiting employer exits.
- 6.3 Without prejudice to paragraph 6.2, upon exiting the Pension Fund, in accordance with regulation 64 of the Regulations, the scheme employer will be liable to pay an exit payment to the Pension Fund or shall be entitled to receive an exit credit, depending on its funding position on exit. The Administering Authority will request an actuarial assessment to determine the amount of the exit payment or exit credit and inform the outgoing scheme employer.
- 6.4 There are some circumstances in which it would not be appropriate to pay an exit credit and those are as follows:
- 6.4.1 Where the body was admitted prior to 14 May 2018;
- 6.4.2 Where the admission body has entered into risk sharing arrangements (see paragraph 3.5 above), including pass-through arrangements, and the terms of those arrangements do not permit an exit credit to be paid; and
- 6.4.3 Where the administering authority has been asked by the Letting Employer to withhold payment of the exit credit under the terms of its contract with the admission body, for the purposes of setting off any amounts due to the Letting Employer.
- 6.5 In the event that an employer owes any outstanding monies to the Pension Fund upon exit, the administering authority reserves the right to deduct such sums owed from any exit credit due.
- 6.6 Unless there are exceptional circumstances, the administering authority will normally expect the exit payment to be paid as a lump sum. In such exceptional circumstances, if alternative repayment options are proposed, then the administering authority will consider them based on legal and actuarial advice. Such alternative repayment options may include (but are not limited to) recovery by way of an instalment plan with security against appropriate assets.
- 6.7 Scheduled Bodies may exit the Pension Fund in accordance with the circumstances set out in the Regulations.

Warwickshire Pension Fund - Admissions and Termination Policy

Annex A – Scheduled Bodies *(List current as at the date of this policy – check the legislation for updates)*

Schedule 2 – Part 1

1. In England, a county council, a district council, a London borough council, the Greater London Authority, the Common Council of the City of London and the Council of the Isles of Scilly.
2. In Wales, a county council or a county borough council.
3. A joint board, body or committee appointed under any Act or statutory order or statutory scheme, of which all the constituent authorities are councils of a description in paragraph 1 or 2 or a combination of such councils.
4. A Mayoral development corporation within the meaning of section 198 of the Localism Act 2011.
5. A fire and rescue authority within the meaning of the Fire and Rescue Services Act 2004.
6. A police and crime commissioner.
7. A chief constable within the meaning of section 2 of the Police Reform and Social Responsibility Act 2011.
8. The Commission for Local Administration in England.
9. A probation trust established under section 5 of the Offender Management Act 2007 or a National Probation Service local board.
10. The Chichester Harbour Conservancy.
11. The Lee Valley Regional Park Authority.
12. An integrated transport authority within the meaning of Part 5 of the Local Transport Act 2008.
13. The Broads Authority.
14. A further education corporation, a sixth form college corporation or a higher education corporation within the meaning of section 90 of the Further and Higher Education Act 1992.
15. The London Pensions Fund Authority.
16. The South Yorkshire Pensions Authority.
17. The Environment Agency.
18. A National Park Authority established under Part 3 of the Environment Act 1995.
19. An Education Action Forum within the meaning of section 11 of the School Standards and Framework Act 1998.

Warwickshire Pension Fund - Admissions and Termination Policy

20. A proprietor of an Academy within the meaning of section 579 (general interpretation) of the Education Act 1996 who has entered into Academy arrangements within the meaning of section 1 (academy arrangements) of the Academies Act 2010.
21. A body set up by a local housing authority as a housing management company to exercise management functions of the authority under an agreement approved by the appropriate minister under section 27 of the Housing Act 1985.
22. The Valuation Tribunal Service established under section 105 of the Local Government Act 2003 and the Valuation Tribunal for Wales established under regulation 4 of the Valuation Tribunal for Wales Regulations 2010.
23. A conservation board established under section 86 of the Countryside and Rights of Way Act 2000.
24. A combined authority established by an order under section 103(1) of the Local Democracy, Economic Development and Construction Act 2009.
25. The Barnsley, Doncaster, Rotherham and Sheffield Combined Authority established by the Barnsley, Doncaster, Rotherham and Sheffield Combined Authority Order 2014.

Schedule 2 – Part 2

1. The Board of Governors of the Museum of London.
2. A body (other than a body listed in Part 1 of this Schedule) which is—
 - a. a precepting authority within the meaning of section 69 of the Local Government Finance Act 1992 (interpretation),
 - b. a levying body within the meaning of section 74 of the Local Government Finance Act 1988 (levies), or
 - c. a body to which section 75 of that Act (special levies) applies.
3. A passenger transport executive.
4. An institution designated by an order under section 129 of the Education Reform Act 1988.
5. An entity connected with a local authority listed in paragraphs 1 to 5 of Part 1 of this Schedule where “connected with” has the same meaning as in section 212(6) of the Local Government and Public Involvement in Health Act 2007.
6. A company under the control of a body listed in paragraphs 6 to 24 of Part 1 of this Schedule

where “under the control” has the same meaning as in section 68 or, as the case may be, 73 of the Local Government and Housing Act 1989 (except that any direction given by the Secretary of State must be disregarded, and any references to a local authority treated as references to such a body).
7. The Public Services Ombudsman for Wales.

Warwickshire Pension Fund - Admissions and Termination Policy

8. The Serious Organised Crime Agency.
9. Transport for London.
10. The London Transport Users' Committee.
11. The Cultural Strategy Group for London.
12. The Children and Family Court Advisory and Support Service.
13. An urban development corporation.
14. The Secretary of State, in respect of persons specified in regulation 3A(1) (civil servants engaged in probation provision).

Schedule 2 – Part 4

15. A local authority that has, with the consent of the governing body, designated an employee or a class of employees of a governing body of a voluntary school as being eligible for membership
16. A local authority that has, with the consent of the governing body, designated an employee or a class of employees of a governing body of a foundation school or foundation special school as being eligible for membership
17. A local authority that has, with the consent of the governing body, designated an employee or a class of employees of a governing body of a technical institute or other similar institution which is for the time being assisted by the local authority under the Education Act 1996 as being eligible for membership
18. A local authority that has, with the consent of the governing body, designated an employee or a class of employees of a federated school as being eligible for membership
19. The London Pension Authority
20. An authority appointing a coroner
21. A police and crime commissioner
22. The Commission for Local Administration in England
23. The passenger transport executive
24. The Housing Ombudsman

Warwickshire Pension Fund - Admissions and Termination Policy

Annex B – Admission Bodies *(List current as at the date of this policy – check the legislation for updates)*

1. Schedule 2 – Part 3, Paragraph 1The following bodies are admission bodies with whom an administering authority may make an admission agreement—
 - (a) a body which provides a public service in the United Kingdom which operates otherwise than for the purposes of gain and has sufficient links with a Scheme employer for the body and the Scheme employer to be regarded as having a community of interest (whether because the operations of the body are dependent on the operations of the Scheme employer or otherwise);
 - (b) a body, to the funds of which a Scheme employer contributes;
 - (c) a body representative of—
 - (i) any Scheme employers, or
 - (ii) local authorities or officers of local authorities;
 - (d) a body that is providing or will provide a service or assets in connection with the exercise of a function of a Scheme employer as a result of—
 - (i) the transfer of the service or assets by means of a contract or other arrangement,
 - (ii) a direction made under section 15 of the Local Government Act 1999 1 (Secretary of State's powers),
 - (iii) directions made under section 497A of the Education Act 1996 2;
 - (e) a body which provides a public service in the United Kingdom and is approved in writing by the Secretary of State for the purpose of admission to the Scheme.

Warwickshire Pension Fund - Admissions and Termination Policy

Annex C – Standard Form Admission Agreement – Transferee Body

Warwickshire Pension Fund - Admissions and Termination Policy

Annex D – Standard Form Admission Agreement – Community Body

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Staff & Pensions Committee**Administration Strategy**

8 June 2020

Recommendation(s)

1. That the Committee approve the Administration Strategy at Appendix A.

1. Executive Summary

- 1.1 The Committee approved the Administration Strategy for consultation at its meeting of 12 March 2020. The Administration Strategy sets out policies and performance standards for the operation of the fund, in particular setting out roles and responsibilities between the employers belonging to the fund and the fund administration function.
- 1.2 Following the meeting the Strategy was circulated to all Scheme Employers as part of a period of consultation, with one month given for responses. No comments have been received and no requests for more time to consider the strategy have been received.
- 1.3 No changes are proposed to the Administration Strategy which the Committee approved for consultation.

2. Financial Implications

None

4. Environmental Implications

None

5. Supporting Information**5.1 Key Highlights of the Administration Strategy:**

- Compliance; seeks to provide good working relationships, improve efficiency and ensure agreed standards of quality and delivery in pensions administration.
- Regulatory framework; provides the regulatory framework for the strategy and allows the administering authority to recover costs incurred because of poor

performance by an employer. Scheme Employer duties and responsibilities; provides guidance on the responsibilities required of an employer to improve the governance of the Fund

- Service standards; provides clear guidance on the service standards expected from all parties. Interest charges; the introduction of interest charges for the late payment of contributions and invoices in respect of rechargeable amounts due to the Fund.
- Charges for poor performance; the Fund will continue to work with employers who fail to meet service standards but as a last resort and particularly where the Fund must employ additional resource to resolve a problem, a charge will be made.

6. Timescales associated with the decision and next steps

6.1 Following final approval by the Committee the Administration Strategy will become active and will be made available on the Fund’s website.

Appendices

1. Administration Strategy.

Background Papers

None

	Name	Contact Information
Report Author	Neil Buxton	neilbuxton@warwickshire.gov.uk
Assistant Director	Andrew Felton	andrewfelton@warwickshire.gov.uk
Lead Director	Rob Powell	robpowell@warwickshire.gov.uk
Lead Member	Peter Butlin	peterbutlin@warwickshire.gov.uk

The report was circulated to the following members prior to publication:

Local Member(s): None

Other members: Councillors Kaur, Gifford and Stevens

PENSIONS ADMINISTRATION STRATEGY STATEMENT

WARWICKSHIRE

pension fund



Introduction

Warwickshire Pension Fund (“the Fund”) is responsible for the administration of the Local Government Pension Scheme (“the Scheme”) within the geographical area of Warwickshire. The Fund also administers the Scheme on behalf of a number of qualifying employers who are not situated within the Warwickshire area. The service is carried out by Warwickshire County Council (“the administering authority”) on behalf of qualifying employers and ultimately Scheme members.

This document is the Pensions Administration Strategy Statement which outlines the policies and performance standards towards providing a cost-effective, inclusive and high quality pensions administration service.

Delivery of such an administration service is not the responsibility of one person or one organisation, but rather the joint working of a number of different stakeholders, who between them are responsible for delivering the pensions administration service to meet the diverse needs of the membership and the regulatory requirements.

1. Compliance

Developed in consultation with employers within the Fund, this statement seeks to promote good working relationships, improve efficiency and ensure agreed standards of quality in delivery of the pension administration service amongst Scheme employers and the Fund. A copy of this strategy is provided to all employers.

In no circumstances does this strategy override any provision or requirement of the regulations, nor is it intended to replace the more extensive commentary provided by the employer information on the Warwickshire Pension Fund website and administration guides provided by the Local Government Association (LGA).

2. Review

The undertakings set out within this Pensions Administration Strategy Statement will be reviewed annually by the Fund. Additionally, the Fund will review this policy statement and make revisions as appropriate, following a material change to the Fund policies in relation to any of the matters contained in the strategy. Employers will be consulted and informed of any changes.

3. Regulatory Framework

Regulation 59-(1) of the LGPS Regulations 2013 enables an LGPS administering authority to prepare a document (“the pension administration strategy”) detailing administrative standards, performance measures, data flows and communication with employers.

In addition, Regulation 70.-(1) of the LGPS Regulations 2013 allows an administering authority to recover costs from an employing authority where costs have been incurred because of that employing authority’s level of performance in carrying out its functions under these Regulations. See section on Poor Performance.

This document has been presented, considered and ratified by the Staff and Pensions Committee on [dd/mm/yyyy] and, as such, the contents of which apply to all existing and future employers of Warwickshire Pension Fund from this date.

4. Scheme Employer Duties and Responsibilities

The delivery of a high quality, cost effective administration service is not the responsibility of just the administering authority, but depends on the joint working of the administering authority with a

number of individuals employed in different organisations to ensure Scheme members and other interested parties receive the appropriate level of service, and that statutory requirements are met.

Monthly/annual data transfer

The Fund currently relies on data transfer by way of the completion and submission of a monthly spreadsheet, but the intention is to move to a portal system.

Response to queries

There are times when the Pensions Team may need to contact employers with queries on the data provided, or to request additional information in order to provide Scheme members with details of their pension entitlement. From time to time, employers may also require information from the Pensions Team regarding the Scheme. Timescales for dealing with specific requests are listed in this document and where a timeframe is not provided, either party should be responded to within 10 working days of receipt of the request.

Appointing a main contact

Each employing authority must designate a named individual to act as the main point of contact with regard to any aspect of administering the LGPS, and to be responsible for ensuring the requirements set out in this strategy are met. Employers are required to keep their designated contact information up-to-date.

Their key responsibilities are:

- to act as a conduit for communications to appropriate staff within the employer - for example, Human Resources, Payroll teams, Directors of Finance;
- to ensure that standards and levels of service are maintained and regulatory responsibilities are complied with.
- to ensure that details of all nominated representatives and authorised signatures are correct and to notify the Fund of any changes immediately;
- to arrange distribution of communications literature as and when required;
- to inform the Fund of any alternative service arrangements required;
- to assure data quality and ensure the timely submission of data to the Fund; and
- to assist and liaise with the Fund on promotional activities.

Authorised signatories

Each employer must nominate individuals to act as authorised signatories, whose names and specimen signatures will be held by the Fund, and who must sign all employer documents or instructions. In signing a document, an authorised officer is not merely certifying that the form comes from the employer stated, but also that the information being provided is correct.

Consequently, if an authorised signatory is certifying information that someone else has compiled, for example leaving information including a final salary pay, career average pay, assumed pay they are authorising to confirm that the information is correct.

It is the employer's responsibility to ensure that details of the authorised signatures are up-to-date, and to notify the Fund of any changes.

Employer Training

The Fund holds annual training for employers where officers of the Fund provide information on finances, investment performance, regulatory changes and also administration performance. Attendance by each employer's nominated contacts is actively encouraged. It is ultimately the responsibility of the employer to ensure that any staff with responsibilities related to the pension fund have the appropriate knowledge and skills.

Discretions Policy

Each employer is required by statute to prepare and publish a written statement as to how they wish to exercise the discretionary powers available to them as a Scheme employer under the LGPS regulations. The policy statement must be kept under review and, where revisions are made, the revised policy statement must be sent to the Fund and made readily available to all employees within the employing authority within one month of the effective date. The LGA has produced a list of all the discretions participating employers have in relation to the LGPS. This document can be found on the website: www.lgpsregs.org. Each employer must provide a copy of their discretions policy to the pension fund and provide updates when it is changed.

Notification of employee's rights

Internal Disputes Resolution Procedure (IDRP)

Under Regulation 72 of the LGPS 2013 regulations, any decisions made by an employing authority affecting an employee's rights to membership, or entitlement to benefits must be made

as soon as is reasonably practicable and notified to the employee in writing including a reference to their right of appeal in line with Regulation 73 of the LGPS regulations. Every notification must;

- Specify the rights under stage 1 and stage 2 of the appeals procedure quoting the appropriate regulations;
- Specify the time limits within an appeal, under either stage, which apply and;
- Specify to whom an application for appeal must be made to.
 - For first stage appeals this must be the nominated person of the employer who made the decision. For 2nd stage appeals this will be the appointed person at the administering authority

The Fund has guidance for employers to provide to individuals who raise an issue under the IDR procedure.

Nominated person

Each employing authority is required to nominate and name the person to whom applications under Stage 1 of the IDR should be made. Employers must notify the Fund of any first stage appeals they receive.

Employers should inform the Fund of appointed medical practitioners.

5. Service Standards to Scheme Members

Overriding legislation dictates the standards that pension schemes and employers should meet in providing certain pieces of information to various associated parties – not least of which includes the scheme member. The LGPS Regulations also identifies a number of requirements for the Fund and employers, which may not have all been covered in this document. It is important that employers make themselves familiar of the HR and Payroll guides available on www.lgpsregs.org.uk

An online employers guide “Working Together” is available on the Fund’s website www.warwickshirepensionfund.org.uk which includes template forms and guidance for all Scheme employers.

The levels of performance and procedures which the Fund and employers are expected to achieve to ensure compliance with the overriding legislation are outlined in the below tables:

Each employer will be asked to provide a list of contacts.

6. Recovering Costs / Sanctions / Fines

Where a serious or persistent and on-going failure to deliver employer responsibilities to the Fund occurs (for example late contributions, late data submissions, or poor data quality), and no improvement is demonstrated by an Employer (and or unwillingness is shown to resolve the issues identified) the Fund may under Regulation 70 (1) of the LGPS Regulations 2013 recover costs from an Employer, where costs have been incurred because of that Employer's level of performance in carrying out its functions under these Regulations.

Any costs, charged by the Fund will be recovered from the Employer and not the third-party company appointed by the Employer to provide pensions services e.g. a third-party payroll provider.

Circumstances where additional costs may be recovered

The circumstances where additional costs may be recovered from the Employer include but are not restricted to:

- persistent failure to provide relevant information to the administering authority, 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 Employer results in a loss to the Pension Fund, e.g. any overpayment resulting from inaccurate information supplied by the 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 Employee and Employer contributions within the standard timescales;
- failure to pay or pay on time any other amounts due to the Pension Fund, e.g., actuarial strain payments;
- instances where the performance of the Employer results in fines being levied against the administering authority by the courts, the Pensions Regulator, the Pensions Ombudsman or any other regulatory body.
- instances where the performance of an Employer results in the Fund having to incur out of the ordinary additional expenditure in order to manage around the performance issue, for example having to employ additional staff to manage with lower quality data.

Approach to seeking additional administration costs

The administering authority may take any of the following steps:

- write to the Employer, setting out the issues;
- meet with the Employer to discuss the issues and how these can be addressed;
- issue a formal written improvement notice, where no improvement is demonstrated by the Employer, setting out the issues that have been identified, the steps taken to resolve the them, and that the additional costs will now be reclaimed;
- clearly set out the calculations of any loss resulting to the Pension Fund or administering authority, or additional costs, considering the time spent and resources used in resolving the issue.
- Issue reminders and final notices in respect of due debts.
- Instigate legal debt recovery action including the recovery of collection costs.

Penalties for Failure by Employers to Meet their Statutory Obligations

Administration costs shown below will be charged if an Employer has consistently failed to meet its obligations and an **Improvement Notice** has been issued and not complied with

Employer to the Fund (where the case has to be returned for incorrect information on more than two occasions)	
*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 HMRC and or reimbursement of charges imposed by HMRC on the Warwickshire Pension Fund.
Fines from other statutory body incurred as a result of employers actions	As levied

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 this strategy.
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 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 employer	£50 per case

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

The Pension Fund will do everything possible to support Employers to avoid costs but will levy them where necessary.

The Fund will report Employer performance to the Local Pension Board and Pension Fund committees as appropriate, including reporting of the charging of costs and interest to Employers.

7. Standards of Data

Overriding Legislation in performing the role of administering the LGPS

The Fund and employers will comply with the overriding legislation, including:

- the Occupational Pensions Schemes
- (Disclosure of Information) Regulations 2015;
- The Local Government Pension Scheme (Amendment) (Governance) Regulations 2015;
- the Pensions Act 1995, 2004 and 2014;
- any Transitional Regulations currently in place;
- the Discretionary and Compensation Regulations 2006;
- the Data Protection Act 1998;
- the Freedom of Information Act 2000;
- the Disability Discrimination Act 1995;
- the Age Discrimination Act 2006;
- the Finance Act 2004;
- Health and Safety legislation;
- Employment Rights Act 2010;
- HMRC Legislation and Current GAD Guidance;
- Public Service Pensions Act 2013;

and any future amendments to the above legislation.

Data Protection Act 2018

The Warwickshire Pension Fund is a Data Controller as part of the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR). This means we store, hold and manage personal data in line with statutory requirements to enable us to provide pension administration services. To enable us to carry out our statutory duty, we are required to share information with certain bodies, but will only do so in limited circumstances. More information about how we hold data and who we share it can be found in the Fund's Privacy Notice on www.warwickshirepensionfund.org.uk

The Fund has introduced a Memorandum of Understanding (MOU). The aim of the MOU is to set out that participating employers in the Local Government Pension Scheme (LGPS) can share data with the LG administering authority without a data sharing agreement being in place. (There is no legal requirement for employers to have a data sharing agreement with LGPS administering authorities as they are both data controllers.) A copy of the MOU can be found on the employers' area of the website www.warwickshirepensionfund.org.uk.

Secure Data Transfer

The Fund will follow Warwickshire County Council data security guidelines when sending any personal data, including its published data sharing policy. This means that members' personal data will only be transferred from one party to the other via an acceptable method specified by the Administering Authority which may include any of the following:

- (a) Secure email
- (b) Paper forms signed by an authorising officer from the employer
- (c) Password protected excel spreadsheet

All these measures start from the date of receipt of all relevant information. The annual performance of the Fund is reported each year in the Annual Report.

Audit

The Fund is subject from time to time to audits of its processes and internal controls. Employers are expected to fully comply with any requests for information from both internal and approved external auditors. Any subsequent recommendations will be considered and where appropriate implemented with employing authority cooperation.

Benchmarking

The Fund will regularly monitor its costs and service performance by benchmarking with other administering authorities. Details of the costs of administration, quality measures and standards of performance will be published in the Annual Report.

8. Employer Performance Reporting

As part of this Pensions Administration Strategy the Fund will develop arrangements for reporting on key performance measures.

This approach to reporting will facilitate engagement with employers and provide a mechanism for service level review and recognition of best practice.

Reporting breaches

The Fund has a procedure to be followed by certain persons in relation to reporting breaches of the law to the Pensions Regulator. The breaches procedure applies, in the main to;

- all members of the Warwickshire Pension Board and Committee;
- all officers involved in the management of the Pension Fund including members of the Treasury Team, Pensions Administration Team, and the Head of Finance, Governance and Assurance (Section 151 Officer);
- any professional advisers including auditors, actuaries, legal advisers and fund managers; and
- officers of employers participating in the Warwickshire County Pension Fund who are responsible for LGPS matters.

Breaches can occur in relation to a wide variety of the tasks normally associated with the administrative function of a scheme such as keeping records, internal controls, calculating benefits and making investment or investment-related decisions.

If a breach occurs the breaches policy must be followed.

9. Associated Policy Statements and Documents

Participating employers are advised to familiarise themselves with the other policies issued by the Fund.

Communications Strategy Statement

The statement outlines the Fund's policy on:

- information to members, representatives and employers;
- the format, frequency and method of distributing such information;
- the promotion of the Scheme to prospective members and their employing authorities

Employer Discretions Policy

Since 1997, the LGPS regulations have required every employing authority to:

- issue a written policy statement on how it will exercise the various discretions provided by the Scheme;
- keep it under review;
- revise as necessary.

A full list of employer discretions can be found on www.lgpsregs.org.

10. Fund Contact Information

Write/visit: Warwickshire Pension Fund, The Post Room, Shire Hall, Warwick, Warwickshire, CV34 4RL

Call: 01926412186

Email: pensions@warwickshire.gov.uk

Website: www.warwickshirepensionfund.org.uk

11. Timescales

There are a number of prescribed timescales for delivering activities for both Employers and the Fund. These are summarised in Appendix 2.

Appendix 1 – Service Standards

1a - NEW STARTERS	
EMPLOYER'S RESPONSIBILITY	FUND'S RESPONSIBILITY
<p>To ensure that pensions information is included as part of any new employment induction process, including in contracts of employment and appointment letters.</p> <p>To ensure that all employees subject to contractual admission are brought into the Scheme from their relevant start date, and provide the Pensions Team with accurate member data, using the monthly data submission within four weeks of the members start date.</p> <p>To provide each new employee with a Brief Scheme Guide and New Member Form with their contract of employment. This may be in the form of issuing a paper copy or by directing all new members to the Fund's website where the information can be viewed or downloaded. The most up to date versions of forms and guides can always be found on the Fund's website www.warwickshirepensionfund.org.uk.</p> <p>To determine the appropriate contribution rate (whether individually or by an automated process on payroll) and (as soon as is reasonably practicable), notify the employee of this contribution rate which is to be deducted from the employee's pensionable pay and the date from which the rate will become payable. It is for the employer to determine the method by which the notification is given to the employee, but the notification must contain a statement giving the address from which further information about the decision may be obtained. The notification must also notify the employee of the right to appeal, including the processes and timescales involved. Furthermore, the correct employee contribution rate according to the scheme the member is in – either the 50/50 or 100/100 scheme should be applied and (if appropriate) adjusted throughout the year according to the employer's discretionary policy on rebanding.</p>	<p>To accurately create member records on the pensions administration system following notification from an employer of a new entrant to the Scheme.</p> <p>To support employer requests to attend inductions.</p> <p>To update pension information in accordance with regulatory changes, and to keep PDF versions of forms and guides up to date on the Fund website. www.warwickshirepensionfund.org.uk</p> <p>To accurately record and update member records on the pension administration system within following the receipt of a completed New Member Form.</p>

<p>To send the Fund notification of any eligible employees subject to automatic enrolment, who opt out of the scheme within six weeks of joining.</p> <p>Where there is more than one contract of employment with the same employer, each membership shall be maintained separately and the Fund notified as above.</p>	
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1b - CHANGES IN CIRCUMSTANCES FOR ACTIVE MEMBERS

EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY
<p>To ensure that the Fund is informed of any changes in the circumstances of employees through forms and spreadsheets within four weeks of the change.</p> <p>Forms and guidance can be found in the employers' area of the Fund website at: www.warwickshirepensionfund.org.uk</p> <p>Changes may include:</p> <p>Personal information:</p> <ul style="list-style-type: none"> • Change of name • Marital status • National insurance number • Change of address <p>Conditions of employment affecting pension such as:</p> <ul style="list-style-type: none"> • Contractual hours (mandatory for members who meet the underpin requirements only) • Any remuneration changes due to promotion and down grading • Full-time equivalent pensionable pay according to the pre 2014 definition • Actual pensionable pay (including overtime/additional hours) in 100/100 and 50/50 schemes according to the post 2014 definition (CARE). • Employees contribution rate • Employee number and/or post number • Date joined scheme (if adjusted) • Confirmation of 50/50 or 100/100 scheme entry 	<p>To provide forms and spreadsheets for recording key changes in circumstances and to provide guidance on the secure submission of data.</p> <p>To accurately record and update member records on the pensions administration systems within four weeks of notification, or any shorter period as requested by the employer with regards to specific requirements.</p>

NB. An Employee can easily exceed HMRC annual allowance if their pay increases. You therefore are asked to inform the Fund of:

- Significant pay awards/pay increases
- Honorariums
- Additional Voluntary Contributions (AVC) contributions
- Shared Cost AVC contributions (if applicable)
- Shared Cost Additional Pension Contributions

For a full list of data items required, see the section FINANCIAL AND DATA OBLIGATIONS, or further information is available from the Fund directly. Employers can also visit the webpage on 'monthly data reports and end of year procedure' on the Fund website

www.warwickshirepensionfund.org.uk

Absence

During periods of reduced or nil pay as a result of sickness, injury or relevant child related leave (i.e. ordinary maternity, paternity or adoption leave or paid shared parental leave and any paid additional maternity or adoption leave) assumed pensionable pay (APP) should be applied for pension purposes.

Employer contributions should be deducted from pay and any APP. If the employee receives no pay the employer contributions should still be deducted from APP.

Should an employee wish to purchase Additional Pension Contributions (APC) or a Shared Cost Additional Pension Contributions (SCAPC) contract to buy back the pension 'lost' during the absence, the APP amount will need to be calculated and provided to the member's employer. Employers must bring to the attention of the member, before a period of absence, that they can buy back the 'lost' pension. Employers should also direct members to the website www.lgpsmember.org where they can calculate the cost to buy back this 'lost' pension. As employees have a thirty day timeframe with which to buy back the lost pension, employers should be sure to mention this to the employee early on in the 30 day period.

<p>Types of absences include:</p> <ul style="list-style-type: none"> • Maternity, paternity and adoption • Paid & unpaid leave of absence • Industrial action (SCAPC not available) • Any other material/authorised period of absence <p>See section 'ADDITIONAL PENSION CONTRIBUTIONS (APCs) and SHARED COST APC's' for further information.</p>	
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1c - ANNUAL RETURN, VALUATION & ANNUAL BENEFIT STATEMENTS

EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY
<p>The information should be accompanied by a final statement (lgs121a); balancing the amounts paid during the year with the total amounts submitted for the year and to include leavers. A compliance statement (lgs121b) must also be submitted and both duly signed by an appropriate officer. Should there be any under/over payment discovered whilst reconciling, accompanying paperwork detailing this must be submitted together with payment or a formal request for a refund. Year end reconciliation must be completed and forms sent by 30 April each year.</p> <p>To provide any additional information that may be requested to produce annual benefit statements for service up until the 31 March in each particular year by the 30 April each year.</p> <p>To provide the Fund with up to date and correct information as and when requested in accordance with agreed timescales and the regulations.</p> <p>To ensure that all errors highlighted from the annual contribution and pensionable pay posting exercise are responded to and corrective action taken promptly.</p>	<p>To process employer year end contribution returns within three months of receipt i.e. 30 April, or within three months of receipt of the information if later.</p> <p>To produce annual benefit statements for all active members by 31 August.</p> <p>To highlight annually if an individual has exceeded their annual allowance and issue a pensions saving statement by 5 October.</p> <p>Annual benefit statements will also be produced for deferred members, but no information from employers will be required.</p> <p>To provide data to the Fund Actuary and Government Actuary's Department to enable employer contribution rates to be accurately determined.</p> <p>To provide an electronic copy of the actuarial valuation report and contributions certificate to each employer.</p>

1d - RETIREMENT AND TRANSFER IN/OUT ESTIMATES

EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY
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<p>To submit a request using a PEN4 form by post, or attaching it to an email. Each form must be signed by an authorising officer.</p> <p>For larger bulk estimates, requests should be made via the spreadsheet template provided by the Pensions Team, and notice should be given in advance when any redundancy exercises are planned.</p> <p>To provide pay and other relevant information requested by the Pensions Team either on an individual basis or within ten working days of the request, or for bulk/group requests by an agreed timescale with the Pensions Team.</p>	<p>To issue the individual quotations/information within ten working days after all information required to process a quotation has been received.</p> <p>To provide information to the scheme member on any potential transfer in of benefits once all information required to process the quotation has been received (transfer estimate from other pension provider, contracting out, salary details etc) within ten working days. However, legally we do have up to two months to provide the transfer information following receipt of all information required to process the quotation.</p> <p>Separate agreed timescales and any additional cost will be put in place for bulk requests.</p>
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1e - DIVORCE AND OUTSOURCINGS ESTIMATES	
EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY
<p>To provide pay and other relevant information requested by the Pensions Team either on an individual basis within ten working days of the request, or for bulk/group requests by an agreed timescale with the Pensions Team.</p> <p>Staff transfers e.g. outsourcings To ensure early notification/liaison with the Pensions Team when considering an outsourcing exercise which affects members/eligible members of the LGPS. See guidance on 'Becoming an employer or existing employer letting a contract' on the Fund's website.</p>	<p>Where a request for divorce information including a CETV is received from the member, or the Court, this will be issued three months from the date of receipt of the signed form request from the member, or receipt of the Court order. When a shorter timescale is requested/imposed the Pensions Team will provide the member with the schedule of charges.</p> <p>To provide guidance to current employers participating in the Fund who are considering outsourcing.</p>

1f - ACTUAL RETIREMENTS	
EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY
<p>To submit the appropriate PEN4 leavers form to the Fund as soon as the information is available. The PEN4 form must be completed fully, and signed by an authorised signatory, as it confirms the information required to enable the benefits to be calculated and the employer's decision as to the type of benefit that is to be paid to the member. Evidence of the calculation of final pensionable pay may be requested so the Pensions Team can check the accuracy of the pay provided. The PEN4 form will be returned if it appears to be incorrect.</p> <p>Further information can be found in the Employers area of the Fund website via www.warwickshirepensionfund.org.uk</p>	<p>To issue the member with a letter and benefits information within five working days of correctly completed employer's notification via the PEN4 leavers form. However, from receipt of all information required to process, the regulations state that we do have up to one month following the date benefits become payable or two months if retirement is early.</p> <p>To issue the member with a letter notifying them of actual retirement benefits within five days following receipt of all documentation from the member</p> <p>To make payment of any lump sum within five working days of receipt of all relevant fully completed forms and certificates from the member, or retirement date if later.</p> <p>To pay any pension payment on the 29th of each month following retirement, unless this falls on a weekend or bank holiday when the payment will be made on the last working day before. Payment will also be made earlier in the month of December to take account of the Christmas period.</p>

1g - ILL HEALTH RETIREMENTS	
EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY
<p>To determine whether an ill health benefit award is to be made, based on medical evidence and the criteria set in the current LGPS regulations, and after obtaining an opinion from a Fund approved Independent Registered Medical Practitioner (IMRP) on the appropriate certificate. If an award is made, to then determine which tier 1, 2 or 3 is to be awarded.</p> <p>Arrange for completion of the PEN4 form and then submit to the Fund with all related paperwork including IMRP certificate and a copy of the notice letter issued to the member</p>	<p>To calculate and pay the required benefits in line with actual retirement timescales.</p> <p>To assist the employer in performing their legislative responsibility to review Tier 3 ill health cases at eighteen months.</p>

<p>confirming the level of ill health benefits awarded and the appeal information under IDPR</p> <p>To keep a record of all Tier 3 ill health retirements, particularly in regards to arranging the eighteen-month review. Arranging if necessary with an (IMRP) approved by the administration authority for a further medical certificate. To recover any overpayment of pension benefits following a discovery of gainful employment and notify the Fund, where appropriate.</p> <p>To review all Tier 3 ill health retirement cases at eighteen months. Further information on ill health retirements can be found on the employers' pages on our website www.warwickshirepensionfund.org.uk</p>	
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1h - MEMBERS LEAVING EMPLOYMENT BEFORE RETIREMENT

EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY
<p>To notify the Fund using a termination form, ensuring all relevant information is included on the form, within four weeks of the members leave date.</p>	<p>To accurately record and update member records on the pension administration system.</p> <p>The regulatory target to inform members the options available to them upon leaving the Scheme within two months following receipt of all the correct information from the employer via the termination form.</p> <p>The Fund's best practice target to calculate notify a member of their deferred benefit entitlement is ten days following receipt of correct information from the employer via the termination form.</p> <p>To process and pay a refund within five days to an eligible member following receipt of all relevant documentation from the member/employer.</p>

1i - FORMER MEMBERS WITH DEFERRED BENEFITS

EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY
<p>To keep adequate records of the following for members who leave the Scheme with deferred</p>	<p>To record and update member records on the pensions administration system.</p>

<p>benefits, as early payment of benefits may be required:</p> <ul style="list-style-type: none"> • Name & last known address • National Insurance number • Payroll number • Date of birth • Last job information including job description • Salary details • Date and reason for leaving <p>To determine, following an application from the former employee to have their deferred benefits paid early, as to whether or not they are eligible for early payment on ill health grounds in line with the criteria set in the relevant regulations and after seeking a suitable medical opinion from an (IRMP) approved by the administering authority, or to determine whether benefits should to be released early and in some cases any actuarial reduction waived on compassionate grounds.</p>	<p>To provide former members with an annual benefit statement of their deferred benefits, updated by the annual pensions increase award when applicable.</p> <p>To provide estimates of benefits that may be payable and any resulting employer costs within ten working days of request upon request.</p>
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1j - DEATH IN SERVICE & TERMINAL ILLNESS

EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY
<p>To inform the Fund immediately on the death of an employee via the PEN4 leavers form, or when a member is suffering from a potentially terminal illness and to provide details of the next of kin.</p> <p>Further information can be found on the employer pages of our website www.warwickshirepensionfund.org.uk</p>	<p>To provide an initial letter of acknowledgement to the next of kin/informant within 5 working days following a notification of death.</p> <p>To provide a letter notifying dependents of benefits within five days following receipt of identification/certificates and relevant documentation.</p> <p>To assist employer's, employees and their next of kin in ensuring the pension options are made available and that payment of benefits are expedited in an appropriate and caring manner.</p> <p>The Fund's policy regarding payment of benefits in such situations, can be viewed in the Governance Compliance Statement.</p>

1k - FINANCIAL AND DATA OBLIGATIONS (INCLUDING CT117 – MONTHLY RETURNS)

EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY
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<p>To pay the Fund all contributions deducted from payroll (not including AVCs) of its employees and employer contributions and any deficit lump sum payments due on a monthly basis, no later than the 19th day of the month following the period of deductions unless alternative arrangements have been agreed in writing with the administrating authority. Further information can be found in the Employer Guide via www.warwickshirepensionfund.org.uk</p> <p>Each payment must be accompanied by a CT117 form providing the following data for each member;</p> <ul style="list-style-type: none"> • National Insurance number • Payroll reference 1 • Member address and postcode • Date of leaving • Payroll period end date • Additional contributions 1 • Additional contributions 2 • Surname • Forenames • Gender • Date of birth • Marital status • Title • Taxable earnings • Annual pensionable salary (only required at month 12) • Pensionable pay • Date joined LGPS • Job title • Part-time hours effective date • Part-time hours • Part-time indicator • Whole-time equivalent hours • Employee's main section contributions • Employer's contributions • Scheme contribution rate • Opt out date • Opt in date • Main section cumulative pensionable pay • 50/50 section cumulative pensionable pay • Full-time equivalent final pay • Cumulative employee's main section contributions • Cumulative employer's contributions • Reason for leaving 	<p>To allocate correctly the contributions received to each employee record and to keep a log of contributions received from each employer.</p> <p>To charge interest for late payment in the following circumstances;</p> <ul style="list-style-type: none"> • Employer contributions (including deficit payment) are overdue if they are received a month later than the due date specified. • All other payments are overdue if they are not received by the due date specified. <p>Inform each employer of any new contribution bandings tables in place from each April.</p> <p>Inform employers of any rechargeable items as they become due.</p> <p>To keep the Fund's Privacy Notice up to date on the website for all members. To keep a Memorandum of Understanding which explains the relationship between the administering authority and participating employers when sharing personal data.</p>
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<ul style="list-style-type: none"> • Cumulative employer Shared Cost APC's • Cumulative employee APC's • Employee's 50/50 section contributions • Cumulative employees 50/50 section contributions • Pay period Shared Cost APC's • Pay period employee APC's <p>To pay all rechargeable items to the Fund on receipt of the invoice.</p> <p>The Fund may charge interest of 3% above 'base rate' on a day to day basis on the due date of payment, if payments of the following are not received by the specified date:</p> <ul style="list-style-type: none"> • If employee / employer contributions are not received by the 19th of the month following deduction from the members pay for cheque payments or 23rd of the month for BACS payments. • If invoices are not paid within the terms of the invoice issued in respect of: <ul style="list-style-type: none"> ○ Rechargeable pension payments ○ FRS102 charges ○ Actuarial strain charges in respect of early retirement ○ Rechargeable fees e.g. academy conversion fees ○ Deficit payments due <p>'base rate' means the base rate for the time being quoted by the Bank of England.</p>	
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11 - ADDITIONAL PENSION CONTRIBUTIONS (APCs) and SHARED COST APC's (SCAPCs)	
EMPLOYERS' RESPONSIBILITY	FUND'S RESPONSIBILITY

<p>To communicate to employees regarding the option of SCAPC's to cover periods of 'lost pension' and the timeframe they must elect to purchase a SCAPC. Members must elect within thirty days of returning to work following the absence, but employers have the discretion to extend this period. This should be laid out in the employer's Discretions Policy.</p> <p>To calculate and collect from the employee, payroll contributions and to arrange the prompt payment to the Fund, according to the published schedule and to be no later than the 19th of the month following the deduction. More information can be found in the employer area on www.warwickshirepensionfund.org.uk</p>	<p>To provide information on APCs to members/employers through www.warwickshirepensionfund.org.uk</p>
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Appendix 2 - Listed Timescales

Employer	Pension Fund
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New Starters			
Where employers subject to contractual admission are brought into the Scheme, accurate member data must be supplied via electronic spreadsheet	Within 4 weeks of the members start date	Create new starter on Altair	Within 4 weeks of notification
Where employees are brought into the scheme via auto enrolment, accurate member data must be supplied via electronic spreadsheet.	Within 6 weeks of becoming a member under auto-enrolment	Send new member form and activation key letter to new starters	Within 8 weeks of notification
		Record and update member records following receipt of New Member Form/ notification.	Within 2 weeks of receiving the completed form
Changes in circumstances for active members			
Inform the Fund of employee changes of circumstances through electronic spreadsheet CT117	Within 4 weeks of change	Accurately record and update member records on Altair	Within 4 weeks of notification
Annual return, valuation and annual benefit statement			
Provide accurate year to date information.	Through 12 months annual returns	Process year end contributions returns	Within 3 months of receipt
Provide Final Statement(lgs121a) and (lgs121b)	Signed and submitted by 30 th April each year.	Produce ABS for all active members.	By 31 st August each year.
		Issue a Pension Savings Statement for members exceeding AA.	BT 5 th October each year.
Retirement and transfer in/out estimates			
		Issue individual quotations.	10 working days after all information required is provided.
		To apply for a Transfer Value	2 weeks after all information required is provided.
		Provide information on transfer in benefits	10 working days after all information required is received.
		Payment of transfer values	Within 7 working days after all information required is received.

Divorce and Outsourcing			
		Request for divorce information.	To be issued 3 months from receipt of paperwork unless shorter timescales requested by paying a charge.
Actual Retirement			
		Issue letter and benefits information.	5 working days after receiving PEN4 form.
		Issue letter notifying actual retirement benefits.	Within 5 working days of receiving all documents from the member.
		To make payment of retirement lump sum.	Within 5 working days of receiving all forms and certificate, or retirement date if later.
		Make monthly Pension Payments.	Last banking day of the month.
Ill health Retirement			
Arrange 18 month review for Tier 3 ill health members.	18 months after retiring on ill health tier 3.	Issue letter and benefits information.	5 working days after receiving PEN4 leavers form.
		Issue letter notifying actual retirement benefits.	Within 5 working days of receiving all documents from the member.
		To make payment of retirement lump sum.	Within 5 working days receiving all forms and certificate, or retirement date if later.
		Make monthly Pension Payments	Last banking day of each month
Members leaving employment before retirement			
Notify Fund via a termination form	4 weeks of the members leave date.	Inform member of their options ,and if applicable deferred benefit entitlement.	Within 1 month of receiving the termination form.
		Process and pay refund.	Within 5 days of receiving all relevant documentation from the member.
Former members with deferred benefits			
		Provide estimates of benefits payable.	Within 10 working days.
Death in Service and terminal illness			
Inform Fund on death of an employee via PEN4 form and provide details of next of kin.	Immediately	Provide an initial letter of acknowledgement to next of kin.	Within 5 working days.

	Provide letter notifying dependents of benefits.	5 days after receiving certificates and relevant documentation.
Financial and data obligations		
To accurately pay the Fund all contributions and deficit (if applicable) along with accompanying electronic spreadsheet.	By the 19 th of each month following the deductions, unless this falls on a weekend or Bank Holiday, when they should be paid by the last working day before the 19 th .	
Additional Pension Contributions (APC's) and Shared Cost APC's(SCAPC's)		
Calculate and collect APC /SCAPC contributions and pay them to the FUND.	By the 19 th of the month following the deductions, unless this falls on a weekend or Bank Holiday, when they should be paid by the last working day before the 19 th .	

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