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Late Linking Options Policy

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Amendment History Record

Issue	Amendment	Update description	Approved By & Date
1	0	Created to reflect decision made to offer late linking (aggregation) options to members where these had previously been missed	Management Review 24/11/2020

1.0 Background

1.1. Members have a 12 month window to elect to link (aggregate) or retain separate deferred benefits. In most circumstances the time limit can be extended by the employer of an active post but any time limit is cut short if a member leaves an active post.

1.2. Where the leaving date in the deferred benefit post is on or after 01/04/2014 linking benefits is automatic if no election is made. Where the leaving date is before 01/04/2014 benefits remain separate if no election is made.

1.3. Cases are sometimes found where members haven't been given relevant linking options and the time limits have now expired. There are various reasons why this might have happened, such as members not telling us about LGPS rights held in other funds or a system glitch/human error resulting in relevant processes not being created.

1.4. Cases are also sometimes discovered when we have taken over administration for other pension funds. And for these cases we don't always know why options haven't been given.

1.5. Some other funds take a pragmatic approach and offer late linking options wherever relevant options haven't previously been given.

1.6. WYPF Management Review Team made a decision on 24/11/2020 that late linking options should be offered to members wherever relevant options hadn't previously been given.

1.7. The expectation is that the Ombudsman would consider it to be maladministration if linking options weren't offered and would direct us to offer these options if members complained.

1.8 And any action taken now might help reduce the number of cases that would need to be processed should the McCloud ruling result in a bulk linking exercise needing to be carried out.

1.9 A decision was also made to notify employers in a bulk communication that this policy had been adopted rather than sending individual requests for an extension to the 12 months time limit.

2.0 WYPF's Late Linking Options Policy

2.1. Whenever a case is identified of a member who hasn't been given all relevant linking (aggregation) options, any options not already given should be sent to the member as soon as possible.

2.2. This is regardless of whether the date of leaving the deferred benefit post is before or after 01/04/2014 and regardless of whether the member is still active in their later post or has now left.

2.3. Members will be given 2 months to make an election and where no election is received the benefits will be linked or kept separate as appropriate.

2.4. An employer extension to the 12 months time limit is not required and so should not be requested for these cases. Employers notified by bulk communication that this policy has been adopted.