

The logo for the Pension Protection Fund, featuring a white arc above the text.

Pension  
Protection  
Fund

A guide to the

# Pension Protection Levy

2023/24

# About this booklet

This booklet is designed to explain your pension protection levy invoice and what to do if you have any questions.

Where words or terms are capitalised, they should be interpreted as in the 2023/24 Levy Rules.

Inside, we make frequent references to pages on our website ([ppf.co.uk/levy-payers](https://ppf.co.uk/levy-payers)).

Other places where useful information can be found are listed below:

**The Pension Protection Score Portal ([ppf.co.uk/scores](https://ppf.co.uk/scores))** – Dun and Bradstreet (D&B) gives the PPF insolvency risk scores and associated Levy Bands and Rates for most employers and guarantors of schemes that pay the pension protection levy. You can find out more about averaging of monthly scores, the allocation to one of ten Levy Bands and the corresponding Levy Rates later in this booklet.

Scheme trustees and employers can access their monthly scores and other information through the portal.

**The levy timeline ([ppf.co.uk/levy-payers/levy-timeline](https://ppf.co.uk/levy-payers/levy-timeline))** – Our timeline shows how the levy works over the years, showing key deadlines, including any upcoming changes, along with your key responsibilities for the upcoming levy years.

**2023/24 Levy Year specifics ([ppf.co.uk/levy-payers/levy-2023-24](https://ppf.co.uk/levy-payers/levy-2023-24))** – Here you can find the electronic versions of the 2023/24 Levy Rules, as well as information about our policy and specific changes to the Levy Rules with regard to invoices being issued in autumn 2023.

**The Pensions Regulator (<https://login.thepensionsregulator.gov.uk>)** – Scheme data used to calculate the PPF Levy is taken from annual scheme returns submitted to the UK regulator of work-based pension schemes (TPR). It is a separate body from the PPF and has many different functions. It works to improve confidence in work-based pensions by protecting members' benefits, promoting good administration of pension schemes and reducing the risk that scheme members may need PPF protection.

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# INTRODUCTION

The PPF Levy is an important source of funding for the PPF and helps ensure that we can provide protection to more than 10 million members of eligible schemes. It is payable by all eligible schemes (whose members are protected by the PPF if their scheme employer(s) become insolvent). Each year following consultation we publish the rules by which the levy must be calculated. Terms throughout the booklet are as defined in those rules for 2023/24.

This section provides a summary of the key features of the levy in 2023/24. This year we have made changes to our calculation methodology – which other things equal – will have reduced the levy for schemes. Changes include reductions to the levy scaling factor, the scheme-based levy multiplier and the Levy Rates.

The PPF Levy is calculated using factors that are set in legislation (Pensions Act 2004 and subsequent regulations). The PPF levy has two parts:

- (i) **Scheme-based levy** – this is paid by ALL eligible schemes and it is calculated as a small part of the scheme's liabilities.
- (ii) **Risk-based levy** – this is only paid by schemes that are not sufficiently well-funded and is calculated using scheme return information provided by scheme trustees. We also take account of the risk of the employer becoming insolvent and the investment risk of the assets held by the scheme.

### Scheme-based levy (SBL)

This is calculated based upon the scheme liabilities reported by trustees on section 179 (s179) valuations.

Schemes are required to complete s179 valuations every three years and we use the most recently submitted. These valuations include both scheme assets and liabilities.

The asset and liability values on the s179 valuation have been adjusted using five-year financial market averages up to 31 March 2023. The purpose for adjusting the asset and liability values is to enable information to be drawn to a common basis for use in the levy and to smooth out year on year volatility.

This adjusted liability value has been used to calculate the scheme-based levy. We multiply it by the 'scheme-based levy multiplier' which is set so that in aggregate we collect the scheme-based levy we need using the following formula:

#### SBL calculation

**Unstressed liabilities (UL) x scheme-based levy multiplier (SLM) (0.000019)**

Example: A scheme has unstressed liabilities of £50 million. The SBLM is 0.000019.

The scheme-based levy charged will be £950 (£50 million x 0.000019 = £950).

### Risk-based levy

The risk-based levy uses the following formula:

**Underfunding (U) x Insolvency Risk (IR) x Small Scheme Adjustment (SSA) x Levy Scaling Factor (LSF)**

### Underfunding

Schemes only pay the risk-based levy if they are underfunded. Schemes are underfunded if their liabilities exceed their assets. As mentioned above we use s179 valuation information and adjust it. In addition, we apply stresses to the asset and liability values. The funding position is usually worse after stressing and it is the worse of stressed/unstressed that we use in the calculation. **If there is no underfunding on a stressed or unstressed basis then no risk-based levy is payable.**

Section 3 provides more detailed information on the underfunding calculation including how additional contributions that meet certain requirements (deficit-reduction contributions) and other risk reduction measures (certain types of contingent assets) can reduce underfunding.

## Introduction – continued

### Insolvency risk

The second element of the risk-based levy is the insolvency risk of the scheme's sponsoring employer(s).

For most scheme employers we use the insolvency risk scores calculated by D&B using the PPF-specific model (primarily using annual accounts information) to assess this risk. A smaller number of employers are assessed using credit ratings. We use a Mean Score (the average of 12-monthly scores to the end of March 2023) which is linked to one of ten Levy Bands. Each Levy Band has its own Levy Rate which is used in the calculation.

Section 3 provides a more detailed explanation including the way in which employers are categorised within the PPF-specific model, how we calculate insolvency risk for multiple employer schemes, and how parental guarantees (Type A contingent assets) can affect this part of the calculation.

### Levy Scaling Factor

The Levy Scaling Factor (LSF) is a single factor that is used in all risk-based levy calculations. For 2023/24 the LSF is 0.37.

### Small scheme adjustment

Schemes with less than £50 million in unstressed liabilities benefit from the application of a small scheme adjustment (SSA). This applies a 50% reduction to a scheme's risk-based levy if the scheme's unstressed liabilities are £20 million or less, with the reduction tapering to 0% at £50 million.

### Risk-based levy cap

There is a maximum amount that any scheme can be charged which is set at 0.25% of unstressed scheme liabilities. So a scheme with unstressed liabilities of £20 million cannot be charged more than £50,000.

## SECTION 1

# This year's policy

In December 2022, we confirmed our policy and rules for 2023/24, which could have an impact on your levy invoice. This section sets out what they mean for you and how you can take advantage of them.

## Levy Scaling Factor (LSF) and Scheme Based Multiplier

We have reduced the key factors used to calculate the risk-based and scheme-based levies.

We have reduced the Levy Scaling Factor ('LSF') by 23%. This means, all schemes that pay a risk-based levy (RBL) will pay less than otherwise.

The Scheme-Based Levy Multiplier has also fallen by 10%. This means that all schemes paying a scheme-based levy would also pay less than otherwise would be the case.

## Insolvency risk

We have also changed the levy rates for levy bands 2 to 10, halving the band-to-band increase in levy rate; this will also reduce the amount of the levy invoice. The new levy bands are set out in section 3.

## Asset categorisation

TPR has now introduced the new Scheme Return requirements and as a result all DB schemes will have been placed in one of three tiers and will have submitted their information based on the tier they fall under.

A simple reporting approach is retained for smaller schemes in Tier 1 (s179 liabilities less than £30m), with more granular information on asset allocations captured from schemes in Tier 2 (s179 liabilities at least £30m and less than £1.5bn). The largest schemes are in Tier 3 (s179 liabilities of at least £1.5bn).

Additionally these schemes also provide information on the sensitivity of their derivative holdings to various risk factor stresses. These submissions are referred to as 'risk factor stress impacts'.

Schemes were able to 'trade-up' to a higher Tier if they wished to provide more detailed information than required.

As a consequence of these changes, we have removed the bespoke investment stress regime which had been in place since 2012/13.

We have also revised and updated the asset stress factors and liability stress factors we use to calculate each scheme's underfunding for levy purposes. The full list of the new stress factors is published in our **2023/24 Transformation Appendix**.

## This year's policy – continued

### Help with paying

The impacts of COVID-19 are still being felt, and we understand this may mean the 28-day term for payment of your levy invoice is difficult to meet. In these circumstances, an extension of terms might be helpful to manage payment of your levy. We're continuing to offer our COVID-19 easement to payment terms. Schemes or the sponsoring employers of those schemes can request that the payment terms of their invoice are extended from 28 to 90 days if they have been negatively impacted by COVID-19. The option to apply for a payment plan for those who are struggling to pay the levy for other reasons is also still available. You can find out more about options for help paying your levy on our website at [ppf.co.uk/levy-payers/pay-your-levy/help-paying-your-levy](https://ppf.co.uk/levy-payers/pay-your-levy/help-paying-your-levy).

### Electronic invoicing

We will also continue to send electronic invoices to the PPF levy contact, and all the scheme trustee email addresses submitted in the scheme annual return. An email notification will be sent to let them know the invoice has been issued. The email will come from [noreply@mail.ppf.co.uk](mailto:noreply@mail.ppf.co.uk) and will link you to a secure messaging service hosted by Mimecast.

This year the Pensions Regulator also introduced a new field on the Exchange system for Schemes to consent to receiving electronic levy invoices only.

If this box is ticked, the scheme will only receive electronic invoices and no hard-copy invoices. If the box is not ticked the scheme will receive hard copy invoices sent to the scheme address as well as electronic copies sent to the PPF levy contact and all the scheme trustees.



## SECTION 2

# Payment of the 2023/24 levy

You have been sent a pension protection levy invoice because we believe your scheme to be one that the Board is required by law to levy.

The invoice details the amount of 2023/24 pension protection levy due from your scheme under sections 175–181 of the Pensions Act 2004.

## How can I pay this levy invoice?

Please pay by BACS, CHAPS or internet banking, quoting your scheme name and invoice number. These are the simplest, most secure and effective methods, helping to reduce administration costs.

Bank details to pay the levy	
Sort code	40-41-70
Account no	20001465
Account name	PPF Levy Collection
Bank name	HSBC
IBAN	GB81 MIDL 404170 20001465
SWIFT/BIC	MIDLGB22

Once payment has been made, please forward a copy of your remittance advice to us at [creditcontrol@ppf.co.uk](mailto:creditcontrol@ppf.co.uk).

**Confirmation that a payment has been received will be sent automatically to the 'Levy contact' listed in TPR's Exchange database.**

If a duplicate payment is made please contact [creditcontrol@ppf.co.uk](mailto:creditcontrol@ppf.co.uk) with details of the payments and which one you would like to be returned. We can only return payments to the same bank account for your security.

If you can only pay by cheque, please make it payable to PPF Levy Collection and send it along with a copy of the invoice to:

**Pension Protection Fund  
Renaissance  
12 Dingwall Road  
Croydon  
CR0 2NA**

## Payment of the 2023/24 levy – continued

### When do I have to pay it?

The invoice is due for immediate payment. Unless you have agreed an extension to payment terms with us, an interest on late payment charge of 5 per cent per annum above the Bank of England base rate will start accruing after 28 calendar days if your levy invoice remains unpaid (see page 10 – Interest on Late Payments).

Our Credit and Collections team will begin debt collection activity in line with the Board's levy collection policy if payment is not received within 28 calendar days of the invoice date and an extension to payment terms has not been agreed.

### Help paying your levy

If your scheme or the sponsoring employer of your scheme is struggling to meet the levy payment within the 28-calendar day timeframe there are ways to extend your payment terms.

#### COVID-19 payment extension

The COVID-19 pandemic has presented significant impact on cash-flow and asset valuations for many businesses and schemes. We understand this may mean the 28-calendar day term for payment of your levy invoice is difficult to meet. In these circumstances, an extension of terms to up to 90 days might be helpful to manage payment of your levy.

### Levy payment plans

Our payment plan policy allows you to apply for a payment plan if you can prove you're genuinely struggling to meet the levy payment within the 28-calendar day timeframe.

More detail can be found at [ppf.co.uk/levy-payers/pay-your-levy/help-paying-your-levy](https://ppf.co.uk/levy-payers/pay-your-levy/help-paying-your-levy).

### If you think your scheme is not eligible

Some defined benefit or hybrid pension schemes are not liable to pay the PPF levies. Our website ([ppf.co.uk](https://ppf.co.uk)) contains a summary of the criteria which might make a scheme ineligible – [ppf.co.uk/levy-payers/what-levy-and-who-has-pay-it/your-scheme-eligible](https://ppf.co.uk/levy-payers/what-levy-and-who-has-pay-it/your-scheme-eligible).

If you believe you are ineligible, you should complete the Ineligibility application form on our website [ppf.co.uk/levy-payers/what-levy-and-who-has-pay-it/your-scheme-eligible](https://ppf.co.uk/levy-payers/what-levy-and-who-has-pay-it/your-scheme-eligible), clearly indicating that you are applying for ineligibility. If you require further information or have any additional questions about whether your scheme is ineligible, you can contact our Levy Customer Support Team (0345 600 2541, option 3 or email [eligibilityandwaivers@ppf.co.uk](mailto:eligibilityandwaivers@ppf.co.uk)) within 28 calendar days of the date of your invoice and before you pay your invoice.

### If you think your scheme should have its 2023/24 levy waived

There are limited circumstances where we may waive either the whole levy or the risk-based levy, but the scheme will continue to be eligible for the PPF. An application can result in the levy being waived for one levy year only; a separate application must therefore be made for each subsequent year that you seek a waiver.

Once schemes have paid their levy invoice they cannot be granted a waiver under any circumstances. Therefore, it is important that you consider the criteria for levy waivers and whether you wish to apply for a waiver **before** you make a payment.

Guidance is available on the levy waivers page of our website [ppf.co.uk/levy-payers/pay-your-levy/who-can-apply-levy-waiver](https://ppf.co.uk/levy-payers/pay-your-levy/who-can-apply-levy-waiver). A waiver can only be granted after you have been issued an invoice, not before. Please note that we have no discretion to waive the levy in other cases.

If your scheme meets the criteria to have the levy waived, you should complete and submit a waiver application form on our website – [ppf.co.uk/levy-payers/pay-your-levy/who-can-apply-levy-waiver](https://ppf.co.uk/levy-payers/pay-your-levy/who-can-apply-levy-waiver). You must make your application before you pay the invoice and within 28 calendar days of the date of your invoice – it is crucial that you meet this timescale because it cannot be extended.

If you require further information or have any additional questions about applying to have your levy waived, you can contact our Levy Customer Support Team within 28 calendar days of the date of your invoice and **before** you pay your invoice.

## Payment of the 2023/24 levy – continued

### What does this invoice not cover?

The Pensions Regulator invoices separately for a number of other levies:

- **Administration Levy**  
This covers the cost of running the PPF.
- **General Levy**  
This covers the cost of The Pensions Regulator, Pensions Ombudsman and the Pension Advisory Service.
- **Fraud Compensation Levy**  
Supports the Fraud Compensation Fund which meets claims as a result of losses to schemes which are attributable to dishonesty.

### Interest on late payments

An interest on late payment charge of 5 per cent per annum above the Bank of England base rate will start accruing after 28 calendar days if your levy invoice remains unpaid. Interest will accrue on the scheme's levies if they remain unpaid during a D&B appeal or PPF review if an invoice has been issued (it is possible to lodge a D&B appeal before an invoice is issued).

If we have agreed an extension to payment terms with your scheme, interest charges may be waived or reduced for payments after 28 calendar days.

To avoid the risk of paying levy interest in the event that your D&B appeal or PPF review is unsuccessful, you can pay the full amount of the invoice. This will not prejudice your D&B appeal or PPF review. Once a successful D&B appeal or PPF review is concluded, any overpayment will be refunded as soon as possible.

We will consider waiving accrued interest but this will depend on the circumstances of the case.

Please note, where an invoice for interest on late payment is raised, the invoice will be emailed to the recorded contacts (unless notified).

For more information on how to raise a PPF review or D&B appeal, please see Section 4 of this booklet.

Paying your levy after 28 calendar days can lead to interest being charged, even if you are appealing against the amount on the invoice. Where an extension to payment terms has been approved, interest charges may be waived or reduced.

#### Interest on late payment calculation

Amount outstanding X ((Days outstanding/365) X (Base Rate% + 5%)) = amount of interest for the period, to two decimal places.

#### Schemes/parts in assessment

Schemes in a PPF assessment period don't pay a levy, provided that a scheme failure notice was issued by 31 March immediately preceding the relevant levy year, and has become binding before the calculation of that scheme's levy.

If an eligible scheme has more than one employer and one of the employers becomes insolvent and the scheme is not a last man standing scheme, then the part of the scheme linked to the insolvent employer will start an assessment period. The rest of the scheme will continue to operate.

In this case, the levy for the part(s) of the scheme in assessment is nil. The continuing part will pay a levy based only on the continuing part(s) of the scheme.

Where part of a scheme entered assessment before 31 March immediately preceding the relevant levy year, but the s179 valuation has not been updated to reflect the change, we calculate the levy for the continuing part by apportioning the assets and liabilities between the parts according to the number of members for each part of the scheme.

## SECTION 3

# Levy calculation

### Information used in your levy calculation

We have used the scheme return, which includes section 179 valuation data submitted via Exchange on or before 31 March 2023, to calculate the levy.

Data that goes into your levy calculation includes:

- the most recent s179 valuation information submitted via your annual scheme return/Exchange;
- the asset allocation submitted via Exchange as applicable to the scheme's Tier (1,2 or 3);
- risk factor stress impacts submitted via Exchange for schemes in Tier 3
- block transfers certified no later than 30 June 2023 via Exchange, where applicable;
- Exempt Transfer applications submitted to the PPF by 29 April 2023 and subsequently accepted by us;
- the Mean Score for each scheme employer and guarantor, averaged using the monthly scores from April 2022 to March 2023 and the corresponding Levy Rate;
- Asset Backed Contribution (ABC) certificates submitted to the PPF.

Additional information, submitted via The Pensions Regulator's Exchange system, which may reduce your levy bill:

- deficit reduction contributions (DRC) made since the last s179 valuation and correctly certified by 28 April 2023; and
- contingent assets pledged to the scheme that were certified or recertified by 31 March 2023 (with any documents received by the PPF by 5pm on 3 April 2023).

We will not generally use information that has not been submitted by the relevant deadlines for that levy year and/or in the form specified by the PPF or TPR, though we do have the right to do so if we consider it necessary in order to charge an appropriate levy.

## How we use this information

The Levy Rules (Determination), its appendices and related guidance can be found in the resource library and on the 'What is the levy and who has to pay it' page on our website ([ppf.co.uk](http://ppf.co.uk)).

### The Levy Rules (Determination)

The Levy Rules for calculating the scheme-based and risk-based levies form the Determination under Section 175(5) of the Pensions Act 2004 (sometimes referred to as 'the Determination'). These Rules, on which we have consulted, detail how we have to treat your scheme and employer data for the purposes of the levy. The Levy Rules are a legal document and, as such, govern the way we calculate the levy.

The Levy Rules and appendices for the current levy year can be found on our website. The information in this guide is based on the Levy Rules for the 2023/24 levy year. We plan to publish a Consultation Document concerning the 2024/25 Levy Rules in the autumn of 2023.

### Adjusting section 179 valuations

We used the asset and liability figures from the latest s179 valuation submitted on or before 31 March 2023, to calculate the scheme-based levy and the underfunding risk factor of the risk-based levy.

Your assets and liabilities were rolled forward and adjusted to reflect market conditions up to 31 March 2023, and then 'smoothed' to reduce volatility. This was done by using average values over a five-year period. This gave us figures for the assets and liabilities that were smoothed but not stressed (referred to on levy invoices as 'smoothed assets/liabilities').

The Unstressed Liability figure has been used in calculating the scheme-based levy, and the cap on the highest risk-based levy you can pay.

## Levy calculation – continued

### How we use this information – continued

The next stage in transforming the asset and liability information provided was to take account of investment risk. We did this by applying generic stresses to the liabilities and specified stresses to the assets according to the degree of risk associated with each type of asset held by the scheme.

Risk factor stress impacts, where submitted by schemes in Tier 3, are then added to give the final stressed asset value.

Liability stressing reflects factors such as gilt yields (and their impact on discount rates) and the age composition of your scheme.

Stressed and unstressed values are used at various points and you will see the following initials on your invoice:

- UA** Assets that have been smoothed but not stressed (without allowance for any risk factor stress impacts submitted by schemes in Tier 3).
- A** Assets that have been smoothed and stressed (including allowance for risk factor stress impacts where submitted by schemes in Tier 3).
- UL** Smoothed but not stressed liabilities or 'Unstressed Liabilities'.
- L** Stressed and smoothed liabilities.

A detailed explanation of the methodology used for smoothing and stressing can be found in the **Transformation Appendix of the 2023/24 Levy Rules** on our website ([ppf.co.uk](http://ppf.co.uk)).



## Understanding your invoice and the calculation of your PPF levy

### The scheme-based levy

The scheme-based levy (SBL) is based on a scheme's liabilities to members on a section 179 basis.

It is calculated using the formula:

$$\text{SBL} = \text{Unstressed Liabilities (UL)} \times \text{Scheme-based Levy Multiplier (SLM)}$$

**SLM** is the multiplier that has been applied to every scheme. The multiplier is 0.000019.

**UL** is the scheme's liabilities on a section 179 basis rolled forward to 31 March 2023 and smoothed but unstressed.

All schemes pay the scheme-based levy, irrespective of their funding position.

### The risk-based levy

The risk-based levy (RBL) is based on the likelihood of a scheme making a claim on the PPF and the potential size of that claim.

It is calculated using the formula:

$$\begin{aligned} \text{RBL} = & \text{Underfunding (U)} \\ & \times \text{Insolvency Risk (IR)} \\ & \times \text{Small Scheme Adjustment (SSA)} \\ & \times \text{Levy Scaling Factor (LSF)} \end{aligned}$$

## Levy calculation – continued

### Understanding your invoice and the calculation of your PPF levy – continued

#### Underfunding represents the potential size of a scheme's claim on the PPF.

U is the underfunding amount of the scheme determined using the scheme's rolled-forward assets and liabilities, taking account of any valid Type B or C contingent asset arrangements, deficit reduction contributions and certified asset backed contribution value and coupon payments. In the great majority of cases, U has been calculated using stressed assets and liabilities where we've tested what they would look like in different situations.

In a small number of cases, for technical reasons using stressed assets and liabilities would improve the funding position of the scheme. Where this is the case, the unstressed deficit has been used instead and this is highlighted on your invoice. Part D of the Levy Rules provides further information on this part of the calculation.

$$U = L - A - D$$

**D** = Deficit-Reduction Contributions (see page 26)

**U** has been further reduced by the value of any recognised Type B (VB), Type C (VC) Contingent Assets and the value of any qualifying ABC arrangements and payments (ABC).

So the full Underfunding calculation can be:

$$U = L - A - D - V_b - VC - ABC$$

If the calculation resulted in a negative amount, zero has been used.

**Insolvency Risk (IR) is the probability of insolvency of the sponsoring employer(s) taking into account scheme structure.**

For schemes with a single employer, monthly scores have been averaged to calculate the Mean Score, which is then matched to a Levy Band with the corresponding Levy Rate used as IR. The summary provided here is expanded upon in the remainder of this section of the guide.

For schemes with multiple employers, a similar process has been followed. A scheme structure factor was applied to each employer Levy Rate, depending on the type of scheme and a weighted average calculated, with the end result producing IR.

IR may have been modified where there is a Type A contingent asset (see page 26).

**The Small Scheme Adjustment (SSA) is a factor which gives a 50% discount on the risk-based levy for schemes with Unstressed Liabilities less than £20 million, tapering to nil discount for schemes with Unstressed Liabilities at least £50 million.**

SSA = 0.5 if Unstressed Liabilities are less than £20 million.

SSA =  $0.5 + 0.5 \times (\text{Unstressed Liabilities} - £20 \text{ million}) / £30 \text{ million}$  if Unstressed Liabilities are between £20 million and £50 million.

**The Levy Scaling Factor (LSF) is a factor that has been applied to all schemes which aims to ensure that overall we collect a levy at a level consistent with our 2023/24 levy estimate.**

In the levy formula, this is represented as LSF and is 0.37 in 2023/24.

## Capping

The risk-based levy is capped to protect the most vulnerable schemes.

Where the risk-based levy calculated using the above formula exceeded 0.25 per cent of unstressed liabilities, the cap has been applied and the risk-based levy is calculated using the following formula:

$$\text{RBL cap} = \text{UL} \times \text{K}$$

**When carrying out this calculation we used 0.0025 for K**

## Levy calculation – continued

### Insolvency risk

#### Measurement of insolvency risk

D&B provided us with scores for most employers and guarantors for the purpose of the PPF Levy, using the PPF-specific model. This is a statistical model, developed using observed insolvencies amongst employers and guarantors of defined benefit pension schemes.

Schemes and employers can register and access information using the Pension Protection Score Portal ([ppf.co.uk/scores](http://ppf.co.uk/scores)). In addition to score information the portal has guidance material and FAQs. Once registered with the portal you can also use the 'What if' tool to see the impact new data will have on an employer's (or guarantor's) Pension Protection Score.

#### Categorisation of employers and guarantors

D&B match PPF employers and guarantors (referred to simply as employers from here onward) to the relevant scorecards as set out in the Determination, based upon key factors such as whether they are part of a group and the type of accounts they file (full or small).

Included within subsidiary (group) scorecards is a parental strength measure and so ultimate parent companies are scored for the purpose of calculating this element of the subsidiary score if they are not already separately scored in their own right.

Where ultimate parents are assessed on the basis of public credit ratings, their score under those methods is used to calculate the parental strength variables for any of their subsidiaries.

The eight PPF-specific model scorecards that D&B calculate scores for are as follows:

Scorecard number	Score source	Scorecard title	Types of entities scored
1	PM	Non-subsidiaries £30m+ and large subsidiaries	Includes ultimate parents of groups and independent employers with £30m or higher turnover and the largest subsidiary companies (£50m turnover and £500m assets)
2	PM	Non-subsidiaries <£30m	Includes ultimate parents of groups and independent entities with under £30m turnover
3	PM	Group £50m+	Subsidiaries with appropriate turnover
4	PM	Group £10m to £50m	
5	PM	Group <£10m	
6	PM	Group Small (accounts)	Subsidiaries filing SME accounts
7	PM	Independent Small (accounts)	Independent employers filing SME accounts
8	PM	Not-For-Profit	An employer which satisfies the 'not for profit' criteria set out in our levy rules and which is not a Special Category Employer or CRA rated

## Levy calculation – continued

### Insolvency risk – continued

#### Data used to allocate employers to scorecards and to calculate scores

##### Scorecard variables

Each PPF-specific scorecard (1 to 8) consists of a handful of variables. In most cases the most recently filed accounts information is used to calculate a factor for each element of the scorecard. These are combined to calculate Monthly Scores on the last day of the month.

##### Accounts

The primary data used for both allocating employers to PPF-specific scorecards and calculating the coefficient (the measure of predictability) for each of the variables is contained in the latest filed accounts with Companies House, the Charity Commission or other permitted sources. Accounts can also be voluntarily submitted to D&B. If a new employer has been formed which has not yet been required to file accounts, interim accounts (covering at least one month) can also be voluntarily submitted. The accounts information is used no later than the month following the date of filing or receipt by D&B.

##### Accounting Standards Change Certificate

For 2023/24, D&B has adjusted scores for schemes that provided an accounting change certificate to them by 31 March 2023, where a change of accounting standard (for example to FRS 101 or FRS 102) impacted the calculation of a trend variable (which compares accounts data in the most recently filed accounts to that filed three years previously).

##### Non-sterling accounts

If accounts are filed or provided and are not in sterling, D&B converts the accounts data to sterling, using the balance sheet date of most recent accounts to convert both those accounts and the accounts used for trend variable calculations.

##### Accounts not published in English

D&B can accept accounts not published in English provided that the translation is accompanied by an auditor's certificate confirming that it is an accurate translation of the accounts.

##### Employee numbers

Our scorecards 3 and 4 include variables that use employee numbers. Businesses which report a Full Time Equivalent (FTE) number in their accounts could request in writing that D&B use that number for the calculation of employee-related variables for Monthly Scores used in 2023/24 provided they did this by 31 March 2023.

Where no employee numbers were shown in the accounts, for example due to the size of the business or as a result of filing accounts in a jurisdiction where there is no requirement to provide employee numbers, D&B accepted a written statement confirming the employee number from the employer's auditor provided it was sent to them by 31 March 2023.

## Other scoring methods

We use alternative methods of scoring where certain criteria are met. There are two additional methods of scoring as follows:

Score source	Scorecard title	Types of entities scored
CR	CRA (Credit Rating Agency) Rated	Employer that is CRA rated
SC	Special Category Employers	A small number of employers that meet required criteria and have been accepted as appropriate to be scored in this way

## Priority of scoring method

Scheme employers and guarantors may be capable of being scored by more than one method. Where an entity has an appropriate credit rating we have used it. Where there is no appropriate credit rating we have used the PPF-specific model provided to us by D&B.

A small number of employers, closely linked to government, which cannot be scored appropriately by a conventional model are assessed as Special Category Employers.

More information about these alternative scoring methods can be found on our website.

Your invoice includes a score source (shown alongside the scorecard number above).

**PM** (PPF-specific scoring model)

**CR** (CRA rating)

**SC** (Special Category Employers)

## Mean Scores

The starting point in establishing the insolvency risk element of the risk-based levy is the averaging of each employer's Monthly Score (for 2023/24 the average is calculated over the 12 months from the end of April 2022 to the end of March 2023). This average is called the Mean Score. Where there are gaps in this information, it has been calculated on the basis of the months for which scores have been calculated and if only a single monthly figure has been calculated, that Monthly Score is used.

The averaged (or only) Monthly Score is then matched to the minimum and maximum Mean Score range of one of ten Levy Bands and the corresponding Levy Rate is used.

## Levy calculation – continued

### Insolvency risk – continued

Levy Band	Minimum Mean Score	Maximum Mean Score	Levy Rate
1	0.000%	<0.030%	0.0028
2	0.030%	<0.049%	0.0030
3	0.049%	<0.086%	0.0031
4	0.086%	<0.143%	0.0034
5	0.143%	<0.243%	0.0039
6	0.243%	<0.488%	0.0049
7	0.488%	<1.049%	0.0063
8	1.049%	<1.595%	0.0076
9	1.595%	<2.986%	0.0089
10	2.986%	100.00%	0.0116

When calculating a Mean Score the Monthly Score is rounded to six decimal places (or four decimal places when expressed as a percentage).

#### Mean Scores for employers based outside the UK

The same broad basis of calculation has been used for non-UK employers as those in the UK. Accounts information has been collected by D&B (for employers scored on Scorecards 1 to 8) where they were able to and if they were not, employers could voluntarily submit accounts to D&B.

The Mean Score has been matched to a Levy Band and Levy Rate in the same way as would apply to a UK employer.

#### What if Mean Scores cannot be calculated for all of a scheme's employers?

Where Mean Scores cannot be calculated for all of a scheme's employers, an average Levy Rate calculation has been used in the risk-based levy for those employers it has not been possible to score. This could have been a scheme average, industry average or a blended average.



## Scheme average

For a multi-employer scheme where D&B were able to calculate Mean Scores for employers that collectively cover at least 50 per cent of a scheme's members, the Levy Rate used in the risk-based levy for any employers of the scheme with no Mean Score has been the mean average of the Levy Rates of the scheme's employers that had a Mean Score.

## Industry average

Where a scheme average could not be used, an industry average Levy Rate was used. This was calculated as the median Levy Rate of all UK sponsoring employers of defined benefit schemes sharing the same 2007 Standard Industry Classification (SIC) code as the employer in question.

## Blended average

Where an appropriate SIC code could not be determined or no Scores were available for the appropriate SIC code, the median Levy Rate for all UK sponsoring employers of defined benefit schemes was used.

## Guarantor Levy Band adjustment

The Levy Band of guarantors (unless they are ultimate parent companies that file consolidated accounts, are scored on the basis of a public credit rating, or are a Special Category Employer) of Type A contingent assets has been adjusted to reflect the impact on the guarantor's balance sheet if the guarantee were called upon. The Risk Reduction section of this guide provides more information about the calculation.

## Single employer schemes

For schemes with a single employer the Insolvency Risk (IR) is simply the Levy Rate (LR) of the employer.

## How does scheme structure affect the risk-based levy?

### Scheme with an option to segregate

This is a multi-employer scheme with rules including an option or requirement to segregate assets if an employer ceases to participate. This type of scheme is referred to in the Levy Rules as a 'Partial Segregation Scheme'. The scheme structure factor shown on the invoice is 1.0 (meaning no adjustment is made to the individual employer Levy Rates in the weighted average calculation).

### Last Man Standing scheme

This is a multi-employer scheme with rules that do not include an option or requirement to segregate assets if an employer ceases to participate, but which is not a centralised scheme for non-associated employers. This type of scheme is referred to in the Levy Rules as a 'Last Man Standing' scheme.

In order for schemes to benefit from the Last Man Standing scheme structure factor, trustees were required to confirm on Exchange that they have received external legal advice that their scheme is Last Man Standing.

Each employer Levy Rate has been multiplied by  $0.9 + (0.1 \times Hf)$  and a weighted average calculated to give IR. Hf is a concentration factor which reflects the extent to which a scheme's membership is dispersed.

The following simple examples demonstrate how the Hf element and the scheme structure factor are calculated. Both examples assume a scheme with 100 members and two employers.

## Levy calculation – continued

### Insolvency risk – continued

#### Scheme A

Employer A Ltd	90 members		
Employer B Ltd	10 members		
<b>Hf Calculation</b>			
Employer A Ltd	$90/100 = 0.9$		
	$0.9^2$		0.81
Employer B Ltd	$10/100 = 0.1$		
	$0.1^2$		0.01
$H_f = 0.81 + 0.01 = 0.82$			
<b>Scheme A, scheme structure factor = <math>0.90 + (0.1 \times 0.82) = 0.982</math></b>			
The scheme structure factor of 0.982 is applied to each Levy Rate before performing the weighted average calculation.			

**Scheme B**

Employer C Ltd	50 members		
Employer D Ltd	50 members		
<b>Hf Calculation</b>			
Employer C Ltd	$50/100 = 0.5$		
	$0.5^2$		0.25
Employer D Ltd	$50/100 = 0.5$		
	$0.5^2$		0.25
$H_f = 0.25 + 0.25 = 0.50$			
<b>Scheme B, scheme structure factor = <math>0.90 + (0.1 \times 0.50) = 0.950</math></b>			
The scheme structure factor of 0.950 is applied to each Levy Rate before performing the weighted average calculation. Note that the greater dispersion of members in Scheme B compared to Scheme A produces a lower value of Hf and hence a lower scheme structure factor.			

**Centralised Scheme (with non-associated employers)**

This is a multi-employer scheme encompassing non-associated employers, and whose rules do not include a requirement or discretion for assets to be segregated if an employer ceases to participate. It is referred to in the Levy Rules as a 'Centralised Scheme'. Each employer Levy Rate has been multiplied by the Hf concentration index alone and a weighted average calculated to give IR.

The calculation of insolvency risk for multi-employer schemes is explained in more detail in Rule E6 of the 2023/24 Determination.

## Levy calculation – continued

### Risk reduction

Underfunding risk or insolvency risk may be adjusted for schemes that made deficit-reduction contributions or put in place contingent assets in accordance with the requirements of the 2023/24 Determination.

#### Deficit-Reduction Contributions (DRCs)

For 2023/24, additional contributions paid into the scheme since the last s179 valuation submitted by 31 March 2023, improving the scheme's funding and reducing underfunding risk, have been recognised in the levy calculation if they were certified correctly by 5pm on 28 April 2023.

#### Contingent Assets

- Type A** Parent or group company guarantees
- Type B** Security over cash, UK real estate and securities
- Type C** Letters of credit and bank guarantees

For 2023/24, the types of contingent assets, referenced in the box above, have been recognised in the levy calculation, provided they satisfied the requirements of the Determination and were certified correctly by midnight on 31 March 2023 (with any documents received by the PPF by 5pm on 3 April 2023).

A Type A contingent asset allows the Levy Rate of a group company or another entity related to the scheme's sponsoring employer to be taken into account in the levy calculation in place of that of the employer.

However, a guarantor's score must have been calculated in its own right (not on the basis of an averaged score where data was not available to D&B) to be taken into account.

Trustees were required to certify a fixed cash sum (Realisable Recovery) that each guarantor could meet in full in an insolvency situation. Where the levy benefit from acceptance of the contingent asset would be £100,000 or more, a report was required to be submitted to the PPF.

If the guarantee was accepted by the PPF, the guarantor's Levy Band may have been adjusted (unless the guarantor is an ultimate parent company which already recognises the scheme underfunding on its balance sheet or is scored based upon a public credit rating, or it is scored as a special category employer) according to the increase in gearing that would result if the guarantee was called upon. The change in Levy Bands is calculated as in the table below.

Increase in gearing	Increase in Levy Bands
0.1 to <0.5	1
0.5 to <1	2
1 or more	3

The Levy Rate of a guarantor only replaces that of an employer when it is better (and so would reduce the levy). Each employer is compared with the guarantor and the lower of the two Levy Rates is used in calculating a revised Insolvency Risk,  $IR_G$ . No scheme structure factor is applied to the guarantor Levy Rate when calculating  $IR_G$ .

Where the contingent asset is only large enough to cover part of the underfunding risk of the scheme, then the benefit of the better Insolvency Risk ( $IR_G$ ) is limited to the share of the underfunding risk covered. The underfunding covered by a contingent asset is shown on your bill in £ as H while the underfunding that is not protected by the contingent asset will be U-H.

Where more than one guarantee is available to the scheme,  $IR_G$  and H figures are calculated for each, and these are used in turn, with the one that offers the greatest benefit to the scheme in reduced levy exhausted first.

### How the levy credit for a guarantee appears on your invoice

For schemes with a Type A contingent asset the risk-based levy formula (with any guarantor adjustment having already been made) is shown as:

$$(\sum_1^t (H^n \times IR_G^n) + (U - \sum_1^t H^n) \times IR) \times LSF$$

The first 'component',  $\sum_1^t (H^n \times IR_G^n)$ , takes account of any part of the underfunding risk covered by one or more contingent assets (the  $\sum$  means where there is more than one contingent asset we add together calculations for each contingent asset).

Then the second component,  $(U - \sum_1^t H^n) \times IR$ , takes account of any part of the underfunding risk not protected by the contingent asset(s).

There is an additional basis to calculate levy credit for schemes where the guarantor is also a scheme employer and/or where there are multiple guarantors covered by a single guarantee.

A description is given below but more detailed information on the changes can be found in the Type A contingent asset guidance.

### Guarantor-employers

Our intention is that guarantor-employers are credited with their pro-rata share of the scheme underfunding in their capacity as an employer, based on membership numbers. This component appears on the invoice as:

$U \times (GAM/M)$ , where:

- GAM represents the number of members allocated to the guarantor-employer; and
- M represents the total number of members in the scheme.

The component above is assessed using the guarantor-employer's insolvency risk as an employer, i.e. incorporating the scheme structure factor where applicable and without any gearing adjustment. This appears on the invoice as  $IR_G^E$ . This component will not apply where H is zero for the guarantor-employer.

The formula then proceeds as above, i.e. with H (the remaining part of the underfunding that is covered by the contingent asset) assessed using  $IR_G$ .

Any residual element of underfunding that is left over after considering all guarantors is assessed using IR, the weighted average insolvency risk for the scheme.

## Levy calculation – continued

### Risk reduction – continued

The risk-based levy formula shown above is therefore modified to incorporate the new component in respect of each guarantor-employer, appearing on the invoice as:

$$\sum_i^t [(U \times (GAMn/M) \times IR_G^{nE}) + (H^n \times IR_G^{n})] \times LSF + \{U - \sum_i^t [U \times (GAMn/M) + H^n]\} \times IR \times LSF$$

Where there was more than one guarantor-employer, they have been applied in the formula in a sequence broadly calculated to maximise the benefit to the scheme in reduced levy.

#### Multi-guarantor arrangements

Schemes with a multi-guarantor arrangement must now certify individual amounts based on the relative strength of each guarantor, rather than certifying a single amount in respect of the entire guarantee.

Such arrangements will be treated as individual contingent assets in the levy formula, with each corresponding amount H applied separately.

However, if schemes have certified amounts that total to more than the liability cap in the contingent asset agreement, levy credit will be restricted to a level reflecting that liability cap.

**Type B and C contingent assets** reduce the level of underfunding in the risk-based levy calculation.

We have only recognised contingent assets which were put in place using our standard forms of documentation, certified correctly and which have had the effect of reducing risk.

More information on each type of contingent asset can be found on the Contingent Assets page of our website.

### Asset Backed Funding Structures (ABCs)

Adjustments have been made to the 2023/24 levy calculations for schemes that have asset backed funding structures (ABCs).

#### Reduction of scheme assets reported in s179 valuation

Schemes identified as having an ABC arrangement have had their s179 assets figure reduced by the corresponding value of the ABC before the assets were rolled forward and transformed as described at the start of this section.

#### Reduction of scheme underfunding for qualifying ABC arrangements

Where an ABC certificate was submitted by 31 March 2023 and has been accepted by the PPF, scheme underfunding has been reduced by the value of the ABC arrangement and any ABC payments certified.

Guidance on the treatment of contingent assets, and how to certify them can be found on the 'Contingent Assets' page of our website.

## SECTION 4

# Querying your invoice

## Reviews and Appeals

If you are considering appealing your invoice, please be aware that the outcome of appeals can cause bills to increase as well as decrease, or can have no effect on the amount of the bill at all.

If there is something you wish to know about the calculation of your invoice, you should first refer to the explanations in this booklet or the Levy Rules for more detail, or visit our website ([ppf.co.uk](http://ppf.co.uk)), where we have set out the answers to frequently asked questions.

When reviewing your invoice, you should check the information you submitted through Exchange and once you are satisfied you should then talk to us to see if we can assist you with your scheme-based levy or the underfunding risk factor of your risk-based levy.

If you believe the Mean Score is incorrect you can raise an appeal with D&B. All queries or appeals must be made within 28 days of the date on the invoice. Your 28-day deadline is also stated on the invoice. You then have a maximum of 28 days to escalate your appeal to each subsequent stage.

If you are not happy or believe other aspects of the invoice are incorrect you can raise a review with us. This section provides more detail on these processes and how to raise an appeal or review with us. Before you seek to raise a review or appeal you can:

- contact D&B to check that they have correctly matched your employer(s) (including your ultimate parent company if you are in a group) to records in their system and to check your Mean Score (average of adjusted Monthly Scores), Levy Band and Levy Rate for 2023/24; or
- contact us to query your scheme-based levy or the underfunding risk factor of your risk-based levy, or any other query.

## Querying your invoice – continued

### Reviews and Appeals – continued

If your scheme's circumstances change, you should update Exchange with any new information on an ongoing basis. This will save you time when it comes to submitting your next scheme return. However, we have generally used only information stored in Exchange at midnight on 31 March 2023 (or other relevant deadlines that apply for 2023/24) in the 2023/24 levy calculation.

#### **If you have submitted incorrect data to the PPF or TPR**

We collect information at specified deadlines for use in the levy calculation, and it is in the best interests of scheme members that we are able to collect the levy as quickly and easily as possible. Information submitted after those deadlines will not generally be taken into account unless we have accepted a correction request. We believe schemes are familiar with using The Pensions Regulator's Exchange system so would expect correction requests to be the exception, and we must be satisfied that there is a good reason in all the circumstances of the case for us to correct the information. Generally, requests made earlier in our process (e.g. before invoicing) will be more likely to be corrected.

An example where we may allow a correction is where a scheme has been prevented from submitting data due to a technical problem with either TPR's or the PPF's systems.

If you identify an insolvency risk discrepancy that relates to a Mean Score, Levy Band or Levy Rate please contact D&B on **0345 600 2541 Option 2** or you can choose **Option 3** to speak to the Levy Customer Support Team.

If you have a query about any other data used in your invoice please contact our Levy Customer Support Team on **0345 600 2541 (option 3)** or email **levyinvoice@ppf.co.uk** within 28 days of the date of your invoice.

If you think we've made a mistake, your scheme trustees or authorised representatives can ask for a review of your invoice. The application form for raising a review can be found here – **[ppf.co.uk/levy-payers/pay-your-levy/request-levy-review](https://ppf.co.uk/levy-payers/pay-your-levy/request-levy-review)**.

#### **Scope of Reviews and Appeals**

Scheme trustees, employers, guarantors and duly authorised representatives are entitled to challenge either the PPF's or D&B's actions or decisions in certain circumstances.

The broad scope of the D&B appeals and PPF Reviews processes are set out overleaf.



Please note that we cannot change the Levy Rules including the levy formula, or the application of any of the policies underlying the Levy Rules. If you apply for a review on the grounds that the Levy Rules themselves are unfair or unreasonable, it will not be successful.

	Within scope	Out of scope	Option to take further?
<b>D&amp;B appeals</b>	Appealable Score (Mean Score, Levy Band & Levy Rate)	<p>Monthly Scores</p> <p>Assignment and calculation of scores of an employer on Scorecards 9 or 11 (Credit Ratings or Special Category Employers)</p> <p>Assignment of an employer to an industry group (to allow an industry average to be calculated) by the PPF Board</p>	Can be further appealed through the Levy Review process once the levy invoice has been issued
<b>Levy reviews</b>	<p>The calculation of a levy invoice</p> <p>Whether interest charged and invoiced for late or non-payment of the levy should be waived</p> <p>An Appealable Score that has previously been appealed to D&amp;B</p>	<p>Challenges to the underlying Policy rather than the Levy Rules</p> <p>Generally, an Appealable Score that has not previously been appealed to D&amp;B</p>	Can be further appealed to Reconsideration Committee and PPF Ombudsman

## Querying your invoice – continued

### Reviews and Appeals – continued

#### Appealing your D&B Mean Score, Levy Band or Levy Rate

Mean Scores have been available through the Pension Protection Score Portal ([ppf.co.uk/scores](https://ppf.co.uk/scores)) since July 2023. If you want to know more about your score, including the scorecard categorisation and other data, you should contact D&B directly on **0345 600 2541 option 2**.

#### Who can appeal to D&B?

1. a Scheme trustee in relation to any Appealable Score relating to the Scheme of which they are a trustee;
2. an Employer in relation to its own Appealable Score;
3. a Guarantor in relation to its own Appealable Score; or
4. a person duly authorised to represent one of the above.

#### Formal requirements

1. Appeals must be in writing.
2. Appeals should be sent by email to [ppf@dnb.com](mailto:ppf@dnb.com) and the title of the email must include the words 'PPF Appeal'.

#### When can a D&B appeal be made?

Appeals to D&B can be made once Appealable Scores (Mean Score, Levy Band or Levy Rate (including where it is based on an averaged calculation)) are available. Mean Scores for 2023/24 have been available from July 2023.

The Pension Protection Score Portal ([ppf.co.uk/scores](https://ppf.co.uk/scores)) contains additional information on the appeals process.

#### Once an invoice has been issued the following timescale applies

Appeals must be received by D&B no later than 28 days after the date shown on the invoice.

#### What if the deadline for appealing has passed?

If you feel that the circumstances make it reasonable that the appeal is being sent after the deadline, you should contact us (following the formal review process below) and be prepared to provide evidence to support your request for it to be considered after the deadline. If we accept your request we will advise D&B who will then consider your appeal.

#### Scope of D&B appeals

You can only appeal against D&B's use of information that was publicly available (at one of Companies House, Charity Commission or other permitted sources as defined in the Levy Rules) or voluntarily provided to D&B (including certificates) by the relevant deadline. Any information that was not publicly available from those sources at that time or presented to D&B by the appropriate deadline will not be taken into account in your appeal.

It is not possible to appeal against Monthly Scores as they are established at the end of each month, although you can discuss factors that may be having an impact on them with D&B at any time. A formal right of appeal is available in relation to your Mean Score, once calculated, and can involve challenging one or more of the Monthly Scores that are averaged to establish the Levy Rate.

You should make it clear to D&B that you wish to appeal the Mean Score, Levy Band and/or Levy Rate. If you are unhappy with the outcome of your D&B appeal you can request a formal review as set out below.

The impact of a qualifying public credit rating can only be appealed in certain circumstances. It is possible to appeal the use of such scores where either the type of rating or score has been used incorrectly or inappropriately assigned to a particular entity.

When raising a query, please quote your scheme name and invoice number so that we can identify your scheme correctly. You can only appeal against the PPF's use of information that was submitted to the PPF, D&B or The Pensions Regulator on or before 31 March 2023 (or other relevant deadlines that apply for 2023/24). Any information that was not submitted at that time will not generally be taken into account when investigating your query.

Most issues with invoices can be resolved by raising a query, but you also have the option of a formal review.

If you query your invoice with us after the 28-day deadline, we will still respond to your query, although you may be too late to apply for a formal review.

### Formal reviews

The amount of a levy invoice is a 'reviewable matter' under section 207 of the Pensions Act 2004. The formal review process considers whether the PPF has followed the rules of the Determination when calculating your levy. It also considers whether interest charged and invoiced for late payment of the levy should be waived.

The formal review process also covers your D&B Appealable Score. You can generally only appeal your Appealable Score through the reviews process if you have first appealed it with D&B.

### How to request a formal review

To request a review, you will need to complete a Levy Review Application Form – available from our website – [ppf.co.uk/levy-payers/pay-your-levy/request-levy-review](https://ppf.co.uk/levy-payers/pay-your-levy/request-levy-review).

#### Formal review applications must:

- be raised by a trustee, or authorised representative; if an employer or guarantor has previously raised a D&B appeal they will need to show that the trustees have authorised them to request a review;
- include your scheme name and invoice number;
- be raised within 28 days of the date on your invoice or the conclusion of a query or D&B appeal (unless you can show that it was reasonable for the application to be made late and that the application was made within a reasonable period); and
- not be about the underlying formula or methodology used to calculate the levy or the policy underlying the Determination.

### Reconsideration Committee

If you are not satisfied with the result of your formal review, it is possible to appeal to our Reconsideration Committee (using the form available on our website [ppf.co.uk/levy-payers/pay-your-levy/request-levy-review](https://ppf.co.uk/levy-payers/pay-your-levy/request-levy-review)) and, if you are not satisfied with the reconsideration decision, ultimately to the Pension Protection Fund Ombudsman. Each body will consider only whether the rules set out in the Determination have been correctly applied, and has no power to modify or depart from those rules.

## Querying your invoice – continued

### Levy collection during your D&B appeal or PPF review

#### How we collect your levy during and after appeals or reviews

##### D&B appeals and PPF reviews

Payment of the levies is a statutory obligation of the trustees (s.181 of the Pensions Act 2004).

An interest on late payment charge of 5 per cent per annum above the Bank of England base rate will start accruing after 28 days if your levy invoice remains unpaid. If an extension to payment terms has been agreed the interest charges may be waived or reduced.

Interest will accrue on the scheme's levies if they remain unpaid during a D&B appeal or PPF review if an invoice has been issued (it is possible to lodge a D&B appeal before an invoice is issued).

To avoid the risk of paying levy interest in the event that your D&B appeal or PPF review is unsuccessful, you can pay the full amount of the invoice. This will not prejudice your D&B appeal or PPF review.

Once a successful D&B appeal or PPF review is concluded, any overpayment will be refunded as soon as possible.

We will consider waiving the accrued interest following the appeal/review, but this will depend on the circumstances of the case.

##### After your appeal or review

If your appeal or review is unsuccessful and your original levy amount remains payable, we will request payment and recommence credit control activity.

If your levy amount decreases, and you have already paid the full amount of your invoice, you will receive a credit note for your previous invoice amount followed by a subsequent revised invoice. Please contact us by emailing [creditcontrol@ppf.co.uk](mailto:creditcontrol@ppf.co.uk) to arrange reimbursement for the difference.

If your levy amount increases you will also receive a credit note for your previous invoice amount followed by a subsequent revised invoice. You will only need to pay the outstanding balance, which should be paid immediately according to the payment terms on the first page of your invoice. The same deadlines for raising queries, appeals or reviews will apply to the new invoice.

Payment of the levies is a statutory obligation of the trustees.

#### Making a complaint about the PPF

If you are unhappy with the service you have received from us you can contact our team. Details can be found on our website [ppf.co.uk/contact-us](https://www.ppf.co.uk/contact-us).

Criticism of our policies, such as the Determination or the Levy Scaling Factor, will not generally be regarded as a complaint; however we will consider the issues you raise as a contribution to future development of the Levy Rules.

## SECTION 5

# Keep in touch with PPF developments and have your say

We regularly hold consultation exercises to get stakeholder feedback on proposed changes to the PPF Levy and wider issues affecting the PPF.

Our consultations are open for all to comment on and our consultation documents are available on our website [ppf.co.uk/levy-payers/help-shape-our-rules](https://ppf.co.uk/levy-payers/help-shape-our-rules).

We encourage stakeholders to respond to our consultations as this provides an opportunity to influence the development of the Levy Rules.

## SECTION 6

# Contact details

### Pension Protection Fund

Renaissance  
12 Dingwall Road  
Croydon  
Surrey  
CR0 2NA

Website: [ppf.co.uk/levy-payers](https://ppf.co.uk/levy-payers)

PPF Levy Customer Support Team:  
**0345 600 2541 option 3**

Please note that calls to the Levy Customer Support Team may be recorded to help us provide the best service for our stakeholders.

#### **levyinvoice@ppf.co.uk**

for levy invoice queries (with the exception of those queries handled by D&B), see pages 32–34.

#### **creditcontrol@ppf.co.uk**

for submitting your remittance advice for levy payments and for any queries regarding payment issues.

### D&B

Portal: [ppf.co.uk/scores](https://ppf.co.uk/scores)

D&B PPF Customer Service Team:  
**0345 600 2541 option 2**

### The Pensions Regulator

Napier House  
Trafalgar Place  
Brighton  
BN1 4DW

Customer Support: **0345 600 5666**

## Disclaimer

The Board of the Pension Protection Fund (the Board) is a statutory corporation established under the Pensions Act 2004 to hold, manage and apply the Pension Protection Fund. References in this booklet to the Pension Protection Fund are references to the Board or to the Pension Protection Fund as appropriate.

The information provided in this booklet does not constitute legal or other professional advice. This booklet is intended to provide guidance only and is not a full statement of the law or the PPF's levy rules as set out in the annual levy Determination. Where legal or other professional advice is required the reader must contact his or her own professional advisers.

Information in this booklet may in some cases be based on legislation that has not yet been fully enacted and/or may be subject to subsequent amendment. The Board accepts no liability for changes in the law that affect the accuracy of the information in this booklet.

## SECTION 7

## Glossary

## Abbreviations and terms used in this guide or on your levy invoice

## General

SBL	Scheme-based levy	UL	Smoothed but not stressed liabilities or 'Unstressed Liabilities'
RBL	Risk-based levy	L	Stressed and smoothed liabilities
SLM	Scheme-based levy multiplier, a factor applied to all schemes	U	Underfunding
LSF	Risk-based levy scaling factor, a factor used in calculating RBL	Hf	Herfindahl factor – a concentration factor for multi-employer 'Last Man Standing' schemes – reflecting the extent to which scheme membership is dispersed
K	Risk-based levy cap, the maximum proportion of liabilities that the RBL cannot exceed	SSA	Small Scheme Adjustment
UA	Assets that have been smoothed but not stressed		
A	Assets that have been smoothed and stressed (including allowance for risk factor stress impacts where submitted by schemes in Tier 3)		



## Insolvency terms

### Score source

PM	PPF-specific model
CR	CRA rating
SC	Special Category Employer

### Other insolvency terms

SSF	Scheme Structure Factor
T	Total number of members in the scheme (used when averaging of Levy Rates is necessary in multi-employer schemes)
WF	Sum of weighted Levy Rates over total number of members
IR	Insolvency Risk. For a single employer scheme this is simply their Levy Rate. For a multiple employer scheme this will be the weighted average of Levy Rates with the scheme structure factor applied

## Risk reduction

IR <sub>G</sub>	Insolvency Risk of a scheme, after comparison of each employer with the guarantor of a Type A contingent asset, and allowing for substitution where appropriate
IR <sub>G</sub> <sup>E</sup>	Insolvency Risk of a guarantor employer (incorporating the scheme structure factor where applicable and without any gearing adjustment)
GAM	Represents the number of members allocated to a guarantor which is also a scheme employer
M	Represents the total number of members in a scheme
A%	Percentage of underfunding to which a Type A contingent asset applies
CA	Contingent asset
H	The underfunding covered by a contingent asset shown on your bill in £
D	Deficit Reduction Contributions

# Notes





Pension  
Protection  
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