

# NATIONAL PENSION COMMISSION

174, Adetokunbo Ademola Crescent, Wuse II, Abuja.
P.M.B. 5170 Wuse, Abuja, Nigeria
Tel: +234-9-4138736-40, 09-6720091, 6720094, 4133398, 4133363 <a href="https://www.pencom.gov.ng">www.pencom.gov.ng</a>

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DATE: 3 FEBRUARY, 2025

TO: ALL LICENSED PENSION FUND ADMINISTRATORS AND CUSTODIANS

SUBJECT: REVISED CIRCULAR ON THE OPERATIONS OF BRANCH OFFICES AND SERVICE CENTRES BY LICENCED PENSION FUND ADMINISTRATORS

1.0 The Commission has observed the need for greater presence of Licenced Pension Fund Administrators (LPFAs) across the Country in order to meet the increasing demand for pension services by the public. The Commission has also observed the need for more efficient service delivery by PFAs at their Branches. To address this issue, the Commission has issued new minimum requirements for the operation of Branch Offices as well as Service Centres which were not covered under the previous Circular issued by the Commission in this regard.

#### 2.0 OBJECTIVES OF THIS CIRCULAR

The Objectives of this Circular are to:

- i. Ensure greater presence of LPFAs across the Country, in order to meet the increasing demand for pension services by the public, and
- ii. Ensure more efficient service delivery by LPFAs, to RSA holders.

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# 3.0 LEGAL FRAMEWORK

The Circular on the Operations of Branch Offices and Service Centres by LPFAs, is to give effect to the provisions of Section 72 of the PRA 2014 which provides that "subject to the approval of the Commission, a Pension Fund Administrator or Pension Fund Custodian may open or close any of its branch offices anywhere within or outside Nigeria".

#### 4.0 GENERAL PRINCIPLES

The following are the conditions for opening Branch Offices and Service Centres:

- A PFA is required to open a Branch Office in any State where it has up to 10,000 funded Retirement Savings Accounts (RSAs).
- ii. A PFA shall in addition to (i) above, be required to open **at least one** Service Center in a different location within the State where it has up to 20,000 funded RSAs.
- iii. Notwithstanding (i) and (ii) above, a PFA shall open a Service Centre in a State where it has up to 2,000 funded RSAs.
- iv. A PFA managing RSAs of employees of State Governments that are implementing the Contributory Pension Scheme shall open a Service Centre where it has up to 1,000 funded RSAs.
- v. The Lead PFA managing the Contributory Defined Benefits Scheme of a State Government, shall open a Branch Office in the State Capital.
- vi. Notwithstanding (i) (ii) (iii (iv) & (iv) above, every PFA shall have Branch Offices in, at least, two States in each geo-political Zone of the Country.

# 5.0 DEFINITION OF TERMS

S/N	TERM	DEFINITION
1	Branch Office and Service Centre	A Branch office or Service Centre is an office dedicated to providing key functional services of the PFA, as stipulated in Sections 2.1 and 3.1 of this Circular.
2	Pension Fund Administrator (PFA)	Any corporate entity licensed by the Commission to administer pension funds and assets.
3	RSA Holder	An active or retired registered contributor with a licensed PFA.
4	The Commission	The National Pension Commission.

# 6.0 MINIMUM STRUCTURE OF A BRANCH OFFICE

# 6.1 Operational and Business Services

# i. Operational Services

- Pension Administration: This covers registration and enrollment of contributors, records update, collection of contribution schedules, amongst others.
- Benefits Administration: This covers collection of benefits payment applications and requests for accessing equity contributions for residential mortgage.
- Customer Support: This includes attending to complaints and enquiries, RSA statements rendition, verification/enrollment of employees/retirees of treasury funded Ministries Departments & Agencies (MDAs), data recapture exercise and other support services to RSA holders.

#### ii. Business Services

- Business Development and Marketing: ensuring participation of those mandatorily covered under the CPS and encouraging voluntary participation in the Micro Pension Plan (MPP) by the informal sector/self-employed persons.
- Sensitization and enlightenment of employers, employees and Micro pension contributors on the workings of the CPS.

# 6.2 Staffing Requirements

- 6.2.1 A Branch Office shall have a minimum of six staff as follows:
  - A Branch Head, who shall at the minimum be of Deputy Manager/Assistant Manager cadre, with not less than 7 years' experience in the pension industry; and
  - ii. Five other staff who whose functions shall cover the operational and business services highlighted in section 6.1 above.
- 6.2.2 Pursuant to 6.2.1 above, the staff in the branch offices shall be graduates and full-time employees of the PFA, and not contract staff or temporary staff of the parent companies or subsidiaries or shareholders of the PFA.

# 7.0 INFRASTRUCTURE AND FACILITY REQUIREMENTS

- 7.1 A Branch Office shall be located in a conducive and secured environment. The office shall be easily accessible to the public with visible signage in front of the building.
- 7.2 A Branch Office shall be equipped with adequate facilities and equipment to enable it carry out its functions. The Branch Office shall at the minimum have adequate facilities for attending to clients such as:

- i. A suitable and conducive office space to accommodate both staff and customers;
- ii. Adequate furniture and fittings for staff and visitors;
- iii. Adequate ICT infrastructure and office equipment such as: computers with internet connection and online real time connection with the Head office, printers, scanners, secured connection, functional telephone lines;
- iv. Alternative source(s) of power; and
- v. Fire proof cabinet and fire safety equipment.
- 7.3 PFAs shall not open Branch Offices in a building beyond the ground floor without making provisions for lift elevators to ensure easy access by RSA holders/customers.
- 7.4 A branch office can only be co-located in the premises of the parent, subsidiary or shareholders of the PFA, only if the entrance to the branch office is different with distinct demarcations, separating the two offices and visible signage.

#### 8.0 MINIMUM STRUCTURE OF A SERVICE CENTRE

# 8.1 Operational and Business Services

# i. Operational Services

- Pension Administration: which covers registration and enrollment of contributors, records update, collection of contribution schedules, amongst others.
- Benefits Administration: which covers collection of benefits payment applications and requests for accessing equity contributions for residential mortgage.

 Customer Support: which includes attending to complaints and enquiries, RSA statements rendition and other support services to registered contributors.

# ii. Business Services

- Business Development and Marketing of prospective clients
- Sensitization and enlightenment of employers, employees and Micro pension contributors about the workings of the CPS.

# 9.0 STAFFING REQUIREMENTS

- 9.1 A Service Centre shall have a minimum of three staff: one of whom must be a University or Polytechnic graduate, with not less than 3 years' experience in the pension industry.
- 9.2 Pursuant to 9.1 above, the Staff at the Service Centre shall be graduates, full-time employees of the PFA, and not contract staff or temporary staff of the parent companies or subsidiaries or shareholders of the PFA.

# 10.0 INFRASTRUCTURE AND FACILITY REQUIREMENTS

- 10.1 A Service Centre shall also be equipped with adequate infrastructure and facilities, as outlined in 7.2 above to enable it carry out its functions.
- 10.2 PFAs shall not locate their Service Centres in Banking or business halls of their parent, subsidiary or shareholders' companies.

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# 11.0 REQUIREMENTS FOR VIRTUAL BRANCH BY LICENSED PFAs

- 11.1 The Commission has recognised the need for PFAs to effectively leverage on the use of technology to expand service options and improve customer experience by being available to RSA holders in an online real time basis.
- 11.2 PFAs are therefore required to operate Virtual Branch to support the physical Branches to improve customer service delivery to RSA holders.
- 11.3 Any PFA that is desirous of opening a Virtual Branch shall satisfy the following minimum requirements:
  - Forward an application to the Commission accompanied by a Board resolution approving the opening of a virtual branch.
  - ii. A detailed explanation on the software to be deployed, data protection measures, schematic diagram indicating proposed area of interaction with RSA holders and ICT security mitigants.
  - iii. Evidence that the Board of the PFA had developed an approved policy on Virtual Branches that aligns with its Customer Service Strategy.

#### 11.4 OPERATIONAL SERVICES FOR VIRTUAL BRANCH

A virtual branch of a LPFA should provide the following services to Retirement Savings Account (RSA) holders:

# A. Information Upload Services

- Enable RSA holders upload relevant documents to the PFA with respect to pension and benefit administration services.
- ii. Allow RSA holders upload information relating to complaints.

# **B. Account Management Services**

- RSA Balance Inquiry: Allow members to check their RSA account balance and contribution history.
- ii. Statement Generation: Provide online statements and contribution history for members to view and download.

iii. RSA Updates: Enable RSA holders to update their details, such as address, phone number, and email.

# C. Contribution and Payment Services

 Contribution Tracking: Allow members to view their contribution history and check the status of recent contributions.

#### D. Investment and Portfolio Services

 Investment Tracking: Allow RSA holders to track the performance of the portfolio.

# E. Retirement Planning & Educational Resources

- i. Retirement Planning Tools: Offer online retirement planning tools, such as calculators and quizzes, to help members plan for retirement.
- ii. Educational resources: Provide access to educational resources, such as articles, videos, and webinars, on retirement planning and the different grounds and modes of accessing pensions.

# F. Customer Support Services

- i. Virtual Meetings: Provide virtual meetings to assist RSA holders and prospective clients with a view to resolving their inquiries.
- ii. Live Chat /Phone support: Offer live chat/phone support to assist members with their inquiries.
- Email Support: Provide email support to assist members with their inquiries.
- iv. FAQs and Knowledge Base: Maintain a comprehensive FAQs section and knowledge base to provide members with quick answers to common questions.

# G. Security and Compliance Services

- i. Secure Login and Authentication: Implement secure login and authentication processes to protect member accounts.
- ii. Data Encryption: Ensure that member data is encrypted and stored securely.
- iii. Compliance with Regulations: Ensure that the virtual branch complies with relevant regulations, such as data protection and anti-money laundering laws.

# 12.0 APPROVAL PROCESS FOR OPENING BRANCH OFFICES AND SERVICE CENTRES

- 12.1 A PFA shall formally notify the Commission before opening a Branch Office/Service Centre and include a resolution of the Board of Directors approving the establishment of the Branch Office/Service Centre, with detailed address.
- 12.2 The Commission shall review the notification to open a Branch Office/Service Centre and if satisfied, issue an Approval –in-Principle (AIP) pending the physical inspection of the Branch Office/Service Centre.
- 12.3 The Commission shall arrange for physical inspection of the Branch Office/Service Centre and grant final approval subject to meeting the requirements specified in this Circular.
- 12.4 The Commission shall issue a final approval or rejection of the Branch Office/Service Centre after the physical inspection of the proposed Branch Office/Service Centre.
- 12.5 Once approval is granted, the PFA would be required to update its website, and other public information materials and forward evidence of same to the Commission.

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#### 13 UPGRADING/ DOWNGRADING OF A BRANCH OFFICE OR SERVICE CENTRE

- **13.1** A PFA shall be permitted to apply for the following:
  - i. Upgrade of Service Centre to Branch Office; and
  - Downgrade of Branch Office to Service Centre.
- 13.2 The application would be considered on the basis of its merits, and shall be accompanied by the following:
  - i. A resolution of the Board of Directors approving the upgrade/ downgrade;
     and
  - ii. Justification for the upgrade/ downgrade.

# 14 CLOSURE/ RELOCATION OF A BRANCH OFFICE OR SERVICE CENTRE

- 14.1 A PFA shall inform the Commission before closure/relocation of a Branch Office/Service Centre with the following information:
  - i. A resolution of the Board of Directors approving the closure;
  - ii. Approval of Management for relocation;
  - iii. Justification for the closure/relocation; and
  - iv. Distance of the nearest Branch Office from the Branch Office/Service Centre being closed or relocated.
- 14.2 The PFA shall close the Branch Office/Service Centre within 5 working days after the approval of the Commission.

# 15 NON- COMPLIANCE/ INFRACTIONS OF THIS CIRCULAR

An administrative penalty of not less than ₩10 million, shall be imposed on any PFA that violates the provisions of this Circular.

# 15.0 EFFECTIVE DATE

- 15.1 This Circular shall supersede all Circulars and Addenda on the opening of Branch Offices and Service Centres issued by the Commission.
- 15.2 The effective date of the Circular is 1 August 2025.

#### **16.0 REVIEW**

This Circular is subject to review by the Commission, from time to time.

# 17.0 ENQUIRIES

All enquiries regarding this Circular shall be directed to the undersigned.

A.M.Saleem

**Head, Surveillance Department**