



NORTHAMPTONSHIRE FIRE AND RESCUE AUTHORITY

PENSION BOARD MEETING

29th September 2022 at 10.30 – 12.30

Microsoft Teams virtual meeting

If you should have any queries in respect of this agenda, or would like to join the meeting please contact Kate Osborne 03000 111 222

Kate.Osborne@northantspfcc.gov.uk

Members of the public, with the permission of the Chair of the Committee, may ask questions of members of the Committee, or may address the Committee, on an item on the public part of the agenda.

Further details regarding the process for asking questions or making an address to the Committee are set out at the end of this agenda notice

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Public Meeting of the Fire Pension Board				Time
1	Welcome and Apologies for non- attendance			10:30
2	Declarations of Interests			10:35
3 (pg3)	Meetings and Action log 21 st July 2022	SH/KO	Report	10:40
4 (pg 7)	Fire fighters pension scheme administration update	NA/ WYPF	Verbal	10:50
5	Update and Breaches of Law	WYPF	Verbal/ report	11:00
6 (pg11)	LGA Bulletin – points of interest https://fpsregs.org/index.php/bulletins-and-circulars/bulletins	HS	Report	11:10
7 (pg 46)	Risk Register	NA	Report	11:25
8	Annual Report	NA & HS	Verbal	11:40
9	Knowledge Management and Representative self-assessment	NA/ SH	Verbal	11:45
10	Data Improvement plan	NA	Verbal	11:50
11	Abatements	HS/NA/ SH/ HK	Verbal	12:00
12 (pg 47)	Agenda Plan	HK / KO	Report	12:20
13	AOB	Chair		
14	Confidential items – any	Chair		
	Resolution to exclude the public	Chair		
	Future Meetings: <ul style="list-style-type: none"> - 29th September 2022 - 8th December 2022 - 23rd March 2023 - 20th July 2023 			12.25

Agenda Item : 3

NFRS Pension Board meeting NOTES AND ACTION LOG – 21st July 2022

Attendees: Shaun Hallam (SH); Nick Alexander (NA); Kate Osborne (KO); Helen King (HK); Jim Dorrill (JD); Helen Scargill (HS);

	Issue	Responsible	Comments
1	Welcome and Apologies for non- attendance		<ul style="list-style-type: none"> • Welcome <ul style="list-style-type: none"> ○ Apologies – Helen King (HK); Aiden Philips (AJP); Sukhjot Kaur (SK); Matt Mott (MM)
2	Declarations of Interests		
3	Meetings and Action log 21 st April 2022		<ul style="list-style-type: none"> - ACTION: SH to book some training around pensions – possibly link with LGA – CF - ACTION: HK – to look at additional training re: regulations – query – to ask HS if you had a package around statutory things if not speak to pensions regulator. HS – can do some things on pension regulations and pensions knowledge. NA – new induction and also regulations (6 months after). Timescales – by next board meeting. ACTION NA and HS - CLOSED ACTION: NA to look into who's responsibility TPR is – NA is NA responsibility. DD will be ultimately responsible, but first contact is NA. - CLOSED ACTION: discussions around immediate detriment meetings – pick up through immediate detriment. - ACTION – Audit report – NA recommend bring all pensions and payroll matters/ recommendations to board for oversight. - CLOSED ACTION: data transition paper – all reconciled information from WY – taken data disposal decisions. All closed off now. HK signed off final transition papers - CLOSED ACTION: succession planning for board - ACTION: HS – sharing papers – will do so this week. - CLOSED ACTION: abatements – covered in accountability board – gap – 0 hours contracts.
4	Fire fighters pension scheme administration update	HS/ NA	<ul style="list-style-type: none"> - HS went through monthly reports drawing board attention to key updates and issues. - ACTION : Sign up for update vlog. – NA recommend to sign up to these. - Annual benefits statements are online only unless individuals have opted out of this.

			<ul style="list-style-type: none"> - NA how we are populating information to WYPF – generically we need to better represent the information we pass to WYPF. This is a working progress. NA provided board assurance is getting better and on a more timely basis. But for now it is contract management and adherence to WYPF policies. Timelines – 1st April. Contingency 1st October. - ACTION: FPS AGM – potentially send representative to AGM to gather information (October 2022) - June report – there was a member update within the report – see report for details. - New section – “communications and training” - July report – Annual Benefits Statements – new information factsheet – hosted on WYPF website - Satisfaction survey – WYPF request for completion and feedback (‘Hot topics’) - WYPF – revising KPIs and reports. Dual reporting in the interim and new service report by end of year. - Breaking news item (page83 of bundle) – may have administration implications. – hearing scheduled for October – if there is a result this could be appealed. Likely Jan Feb decisions. - HS – add agenda item for ‘Communications’ – looking at client quarterly meeting minutes and updates provided if there have been national group meetings, ACTION - KO – add to agenda plan and agendas. Also red comments from monthly reports to provide assurance. - KO – future – monthly reports in separate bundle and HS to provide summary in board meetings. ACTION: HS – to share similar template which highlights actions.
5	Update and Breaches of Law	YG WYPF	<ul style="list-style-type: none"> - None to raise.
6	LGA Bulletin – points of interest https://fpsregs.org/index.php/bulletins-and-circulars/bulletins	HS	<ul style="list-style-type: none"> - Covered within monthly reports. - Have red actions been done – ACTION: NA – confirmation to be given about actions completed. ACTION: NA to send KO report. - NA - Delta returns – in hand – HK is due to sign this off upon return from annual leave
7	Risk Register	NA	<ul style="list-style-type: none"> - 2 risks removed since last risk register - 1. Transfer – has been completed and associated risk have not been completed

			<ul style="list-style-type: none"> - 2. Data ownership – because we have received reconciled and complete data that destruction has been signed off this has also been removed from risk register. Content with Data transfer and ownership - NA has updated the other 7 risks. - Risk – amber feels about right from pension board perspective - ACTION: NA – to send over revised risk register – to include item 8 data management – impact 4. Including data breaches. This has been deleted in error. - ACTION: HS – other FRAs have Matthews as a separate risk. will look at other risk registers to see if there is anything of note and will email to NA.
8	Immediate detriment position	HS/NA	<ul style="list-style-type: none"> - DD to organise a meeting about this. - Where are we at on our position? - NA – nationally – not much has changed with regards to were we were last time. We are awaiting legislation and treasury advice. - LGA are working with legal and Home Office to get a revised framework to provide less risk and more assurance. - DD – lots of discussions. Key issue here is uncertainty around whether we will be able to claim certain elements through additional pension grant. Issues around cost to authority. Issues around claiming through grants and legitimate payments. - Some services seem content costs can be claimed through the grant but they are having to swallow additional costs not covered by grant. Will they be reimbursed?? Unknown - This is feeding into PFCC decision not to claim. - DD – HS what proportion are claiming immediate detriment cases within the sector? – currently 11/23 are paying. - Position currently – DD we are not paying. How long can we hold the line of not paying – pose question to PFCCs. - Considerations to be given about cost to employer and also employee - Comms – risk to member to be communicated ? DD suggestion. Do we write to individual member or something else? Need to develop a comms plan. SH and other CFOs to meet with PFCC to discuss – important to ensure members have both read and understood what the communication means.
9	Firefighters pension scheme administration – annual update	HS	<ul style="list-style-type: none"> - HS – shared screen KPIs for previous 12 months - NA – in a good position and due to data inaccuracies, there have been more delays than what we would like. But this is improving as data quality is improving. - DD – gave thanks to HS and team. - Timeliness of managers doing fp49 forms and employees notifying managers in timely manner - HS – prefer request for estimates to come through FRA. - SH – too look at externally from meeting.

			- JD – spreadsheet of performance – from here onwards. – is that an annual update? can we grade that on year on year performance in future? HS – can do? But these are in monthly performance reports and at meetings raise areas of review/ concern? Could also flag areas which require better/ more comms.
10	Agenda Plan	HK / KO	- KO to update plan for 2023 and book in March 2023 and July 2023 dates.
11	AOB	Chair	- KO to go on Mat leave start of October. Slight change in administration of pension board. Will keep board updated.
12	Confidential items – any	Chair	
	Resolution to exclude the public	Chair	
	Future meetings - 21 st July 2022 - 29 th September 2022 - 8 th December 2022		

Northamptonshire Fire – Local Pension Board

WYPF Report for 29 September 2022

AGENDA ITEM 4&5

Monthly Client Reports

These have been issued for August & September

Please do make sure you read these as they include a lot of useful information and include actions from the LGA bulletins

LGA Bulletins

There have been two issued since your last Pension Board meeting

Bulletin 59 – July 2022

- This had five actions
 - 1, A request to administrators to consider the survey recommendations. WYPF responded to this in the September Monthly Client report
 - 2, An instruction to FRAs to revisit all special member leavers to ensure correct options given
 - 3, FRA instructed to have a process in place to inform administrators of unpaid absence
 - 4, FRAs to share age discrimination data where the member has moved to another FRA
 - 5, FRAs to review the information in the TPO McCloud factsheet

Bulletin 60 – August 2022

- This just had one action
 - 1, FRAs to review the eligibility factsheet and take any appropriate action

Meetings

Fire Communications Group (13 June 2022)

- Full minutes are available
- **Age discrimination remedy – Managing member expectations**
 - A timeline document was produced which was issued alongside the Annual Benefit Statement
- **Age discrimination remedy – Nature of communications**
 - Agreed approach for pensioners who are out of scope
 - Agreed to have a wider discussion for the other cohorts at a future meeting
- **Member benefit illustrations**
 - No feedback received
 - Website hits doubled once published

Fire Technical Community (25 July 2022)

- Full minutes are available

Main items for discussion: -

- **Matthews**
 - Update from Home Office given
 - Discussed data issues for FRAs

- **Eligibility for Sargeant remedy**
 - Signed off the content of the new factsheet. This was published with Bulletin 60
- **Data sharing Sargeant/Matthews**
 - Resolution agreed for Sargeant – published in bulletin 59
 - Further action needed for Matthews

Fire Scheme Advisory Board

- SPPA gave an update on the impact of recent changes to commutation options
- 2020 valuation assumptions
- Contingent decisions
- Update from software suppliers on their progress with Age Discrimination
- Administrator self-assessment survey
- FPS Annual Meeting

Fire Quarterly Client Meetings (13 July 2022)

- Full minutes are available

Main items for discussion: -

- Audits
 - Normal and Early Retirements (FPS) and New Deferred Pensions and Lump Sums (LGPS & FPS) both received 'good' rating with one recommendation for each

Regulation amendments

- No update

Home Office

- The main focus at the moment is the retrospective legislation for Age Discrimination which is due to go live 1 October 2023 and Matthews where the draft consultation is due to be published in the new year

DWP and Pensions Dashboard

- Published a consultation with a closing date for comment of 13 March 2022
- There was a robust response from LGA on the staging dates and presentation of data
- The consultation response confirmed
 - staging date will now be 30 September 2024
 - Value data to be available by 1 April 2025
- Further consultation on standards and guidance as well as call for input now out
- **WYPF Update**
 - Monthly Returns – Received the outstanding year end return and WYPF were able to get all records updated and queries resolved for ABS production
 - It was received late and included a lot of issues that needed resolving in a short time frame
 - Annual Benefit Statements – 100% of Annual Benefit Statements for active members were produced by the 31st August deadline
 - Pension Savings Statements – These are now being worked on with an eye on the deadline of 6th October

- KPI reports - These are included in your Monthly Client reports. We have also provided some updates over the last few months about the changes we are making to how we are measuring the KPIs.
- Breaches – There are no breaches to report

Communications

- **Annual Benefits Statements were issued**
 - Notes available on our website
 - Active member newsletter published at the same time and is available on our website
 - LGA Remedy timeline also made available with the ABS
- **My Pension**
 - A My Pension guide to registration and navigation was made available to members along with a My Pension video
- **Employer Portal**
 - An Employer Portal guide was published and is available on the website

Data Improvement Plan

WYPF will run these reports quarterly so will supply the revised percentages.

We are looking to complete as follows: -

- High priority by Nov 2022
- Medium priority by Nov 2023
- Low priority by Nov 2024

On working through some of the issues it has become clear that some of the data the report is checking is actually correct & for these cases we are working on changes to the report so they are excluded in the future.

Appendix A - Northamptonshire Fire – Data Scores

1992 scheme	Nov 2021	Sept 2022
Common	97.48	99.06
Scheme Specific	76.89	77.99
2006		
Common	89.66	92.66*
Scheme Specific	93.10	99.08
2006 modified		
Common	90.48	100
Scheme Specific	40.48	44.74
2015		
Common	94.06	96.95
Scheme Specific	91.01	91.33
2015 modified		
Common	100	100
Scheme Specific	100	55.56

*11 records - 9 Deferred records with no current home address & 2 with divorce pension sharing orders

“Modified records which have not been updated with the correct start date following the first options exercise



FPS Bulletin 59 – July 2022

Welcome to issue 59 of the Firefighters' Pensions Schemes bulletin.

If you are looking for information on a certain topic, issue and content indexes are held on the [main bulletin page](#) of the website and are updated following each new issue.

If you have any comments on this bulletin, suggested items for future issues, or a job you would like to advertise, please email bluelightpensions@local.gov.uk.

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Calendar of events

Please see below a calendar of upcoming events relevant to the Firefighters' Pension Schemes. Only those events which are hyperlinked are currently available to book. If you have any events you would like to be included in a future bulletin, please email bluelightpensions@local.gov.uk.

Table 1: Calendar of events

Event	Date
North-East regional group	17 August 2022
SAB	8 September 2022
North-West regional group	14 September 2022
FPS Communications Working Group	16 September 2022
FPS Technical Group	25 October 2022
FPS AGM	25 October 2022 26 October 2022
SAB	8 December 2022

Actions arising

Readers are asked to note the following actions arising from the bulletin:

[Administrator survey results](#): Administrators to consider the recommendations set out in section 5 of the report.

[Special members - Corrective action](#): FRAs to revisit all special members leavers and opt outs to ensure that correct options have been given at deferment.

[Service history data for transitional FPS 2015 members](#): FRAs to have a process in place to ensure that their administrator is informed of any unpaid breaks in service for transitional FPS 2015 members.

[Age discrimination remedy - Data sharing](#): FRAs to share pensionable data for members who are subject to age discrimination remedy and have had an inter-brigade transfer during the remedy period with the current FRA's administrator.

[TPO McCloud factsheet published](#): FRAs to review the information in the factsheet to ensure they do not fall short of TPO's expectations.

FPS

Administrator self-assessment survey results

We are pleased to be able to share with you the results of the survey undertaken by the Scheme Advisory Board secretariat in order to provide us with insights into the current administration arrangements and the challenges being faced by administrators, in light of both business as usual and remedy.

The administrator self-assessment survey was launched in [FPS Bulletin 54 – February 2022](#) and ran between 24 February and 18 March. It comprised of 57 questions which focused on variety of topics including Sargeant, Matthews, and pensions dashboards.

The aim of the survey was to understand more about arrangements for administering the Firefighters' Pension Scheme and specifically for implementing the age discrimination remedy.

The survey received a 100 per cent response rate which will allow an accurate assessment of the sector and a better understanding of the challenges that administrators face.

The [full results of the survey and recommendations](#) can be found on the protected area of the [FPS Regulations and Guidance website](#).

ACTION: Administrators to consider the recommendations set out in section 5 of the report.

FPS 2006 special members – Corrective action

We have been alerted to an issue on which FRAs will need to take immediate remedial action.

The issue relates to members who have elected for special membership under the first options exercise and to repay their contributions by way of periodic contributions, however, leave part way through their contract and therefore have a number of instalments still outstanding.

The regulations support the fact that the member's decision to leave should not impact their ability to continue to pay for the cost of past service. If the member leaves, or opts out, they have the option to pay all remaining contributions within three months of the leaving date in order to count all of the service ([Rule 6A, Part 11, paragraph 9](#)). Alternatively, the member can continue to pay periodical contributions as a deferred member ([Rule 6A, Part 11, paragraphs 3 and 7](#)). These regulations were covered in detail at a [special members workshop the LGA hosted in 2018 \(slides 99 and 100\)](#).

We would expect the options above to be offered to a member as a matter of course, however, as we understand it, some FRAs have not offered their members these options.

In preparation for the second options exercise, our view is that corrective action should be taken to address this issue. FRAs should use the time between now and the 2023 options exercise to rectify any such issues where there are regulations in place to do so. This will help keep the 2023 options exercise as straightforward as possible. We therefore recommend that **all** FRAs follow the steps set out below.

1. FRAs to revisit past deferred cases to determine what options were offered:
 - a. If the member has been offered the options as set out above, then no further action is needed.
 - b. If the member **has not** been offered the options as set out above, then progress to step 2.

2. Confirm which regulatory option applies to the member:
 - a. If the member has left within the last 3 months, then they can be offered:
 - i. The option to repay the outstanding contributions by lump sum
 - ii. The option to continue with *periodic contributions
 - iii. The option of a pro-rated pension based on the contributions already paid
 - b. If the member has left more than 3 months ago, then they can be offered:
 - i. The option to continue with *periodic contributions
 - ii. The option of a pro-rated pension based on the contributions already paid

*Periodic contributions would need to be reviewed and possibly altered to take account of any gaps in the repayment schedule. We believe that the correct regulatory option available is to recalculate the instalments so that the remaining balance is repaid at the original 10 year point – in line with [Rule 6A\(8\)](#). The calculator has been specifically designed to ensure that the correct proportion of interest is applied for the 10-year period.

3. FRAs should take immediate steps to contact affected members and notify them of the options available to them.
 - a. If the member elects for periodic contributions, as they are no longer employed and instalments cannot be taken from their salary, they will have the option of paying by standing order.
4. FRAs to notify administrator of the member's decision and update their record accordingly.

ACTION: FRAs to revisit all special member leavers and opt outs to ensure that correct options have been given at deferment.

Service history data for transitional FPS 2015 members

As of 1 April 2022, all members who remain active members of the Firefighters' Pension Scheme do so as members of FPS 2015. The FPS 2015 is a statutory, defined benefit, career average, public service pension scheme.

Unlike the final salary schemes (FPS 1992 and FPS 2006), where pension entitlement is based on scheme membership and pay on leaving the scheme, career average scheme benefits are worked out based on a proportion of pay for each year of membership.

As qualifying service in the FPS 2015 is added to qualifying service in the FPS 1992 or 2006 to determine whether a member with continuity of service qualifies for retirement benefits, any reduction in pensionable service due to an unpaid service break such as maternity/paternity/adoption leave, industrial action, and career breaks will affect that date by the relevant number of days (for example a member needs a minimum of 25 years across the FPS 1992/ 2015 combined to retire before age 55). Therefore, FRAs should continue to record and report any days lost to unpaid service to their pension scheme administrator.

ACTION: FRAs to have a process in place to ensure that their administrator is informed of any unpaid breaks in service for transitional FPS 2015 members.

Age discrimination remedy - Data sharing

As part of the data collection exercise for age discrimination remedy FRAs may identify a proportion of cases whereby information such as pensionable pay and contributions are required from another FRA. This is because the member has been subject to an inter-brigade transfer during the remedy period.

We understand, from speaking to stakeholders, that concerns have been raised over sharing this data, particularly when it comes to General Data Protection Regulation (GDPR).

[The Public Service Pension and Judicial Offices Act 2022](#) states that with effect from 1 October 2023 all in scope members must be rolled back into their relevant legacy scheme and reformed service, for the remedy period, should be kept as an underpin.

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This corrective action cannot be taken unless the current administrator has access to the data they need to perform this function.

This issue was discussed in detail at the Fire Technical Working Group (FTWG) on Monday 25 July. It was decided that, to remove any GDPR issues, the information should be shared with the current administrator instead of the current FRA. This is because the administrator has a legitimate reason for needing the data.

To assist FRAs in determining which administrator to contact a comprehensive [list of FRAs and their administrators](#) can be found on the [FPS Member website](#).

ACTION: FRAs to share pensionable data for members who are subject to age discrimination remedy and have had an inter-brigade transfer during the remedy period with the current FRA's administrator on request.

Duradiamond - Contract extension

The Home Office has received several queries regarding the status of the medical appeals board framework contract currently supplied by Duradiamond (trading as Health Partners).

The contract with Duradiamond/Health Partners was due to expire on 30 September 2022. The Home Office has agreed to extend this contract by a further 12 months to reduce the backlog of cases that accrued because of the pandemic and to avoid any further disruptions to the service. The terms of the contract remain the same and the extension will begin on 1st October 2022.

If you have any queries regarding the Fire Medical Appeals Board (FMAB) contract with Duradiamond/Health Partners, please use the following contact details:

PFMAB Administration Team

Cathy Golson – Team Leader

Lorna Nyajeka – Appeals Coordinator

Email: pfmab@healthpartners.uk.com

Tel: 01273 963729

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Carole Scott – Relationship Manager

Email: carole.scott@healthpartners.uk.com

Tel: 01273 023042

The Home Office has set up an email address that can be used if a matter needs further escalation once all other points of contact have been exhausted. This email address should not be used to enquire about appeal updates or process related queries. When using this email, please copy in Carole Scott as listed above.

Email: pfmabcontract@homeoffice.gov.uk

Technical query log

The [current log of queries and responses](#) can be accessed by practitioners in the member-restricted area of the FPS Regulations and Guidance website. The queries have been anonymised and divided into topics. The log is updated monthly in line with the bulletin release dates.

Queries have been answered this month in the following categories: Annual Allowance (page 15), IHR for deferred Special Members (page 84), Payroll (page 95), Two Pensions (page 122).

FPS England SAB updates

FPS 1992 Scotland – commutation provisions

We reported in [FPS Bulletin 55 – March 2022](#) that the commutation provisions have been amended for FPS 1992 Scotland from 1 April 2022. At the SAB meeting on 23 June 2022, SPPA gave an update to the Board on the impact that the change in the provisions has had on retirement numbers. SPPA reported that there had been a significant rise in expected retirements in the first quarter of 2022-2023. Due to timing, it is not clear whether this is because of the change in provision or due to the move of all members back into the FPS 2015 from 1 April 2022. It is also not clear how this will impact on workforce planning.

The SAB has decided to monitor the impact of this over a longer time period so that more data is available to be considered. If the SAB wanted to pursue a change to the commutation provisions in England, then a business case would have to be prepared for the Government to take this forward.

2020 Valuation assumptions

At the last SAB meeting GAD provided the Board with a presentation on four of the key demographic assumptions which are proposed to be used in the 2020 valuation. These are: withdrawal from the scheme, promotional pay, age retirement and commutation.

GAD confirmed that there had been an improvement in the data provided by FRAs for the 2020 valuation.

The Board agreed that a discussion on the key assumptions should be taken forward to the Cost-Effectiveness committee to ascertain if these assumptions are reasonable. The Cost-Effectiveness committee met accordingly on 5 July 2022 and these GAD will now consider the assumptions to be presented to the Home Office for incorporation into the valuation exercise.

Contingent decisions

At SAB meeting on 23 June 2022, a [paper on contingent decisions](#) was discussed which introduced the topic to the board and highlighted the instances where a contingent decision may apply.

Police and Fire SABs are involved in joint engagement sessions with the Home Office to discuss the policy definition documents (PDDs) in relation to remedy.

A joint engagement session on contingent decisions is due to take place on 9 November 2022 with Home Office and the SABs.

PDDs on interest and eligibility were discussed on 24 June 2022 and any actions arising from the feedback of Police and Fire SABs will be taken forward and responded to by the Home Office.

Membership, committees, and training

SAB members have been asked to complete a training needs analysis form for the secretariat so that any training needs can be identified with a view to performing training sessions before the end of the year which will include SAB induction training and Local Pension Board Wrap-up training sessions.

Work is also ongoing to fill existing vacancies in the committees which are there to support the SAB with its work.

Software suppliers

Representatives from Heywood Pension Technologies and Civica attended the SAB meeting on 23 June 2022 to provide the Board with a useful update on their progress on remedy over the last 12 months. They also provided an update on the phases of development going forward which the Board felt was useful.

Other News and Updates

Public Sector unions granted judicial review over McCloud cost remedy

As previously referred to in [FPS Bulletin 51 – November 2021](#), unions across the public sector sought a judicial review against the UK Government about McCloud/Sargeant remedy costs in the cost control mechanism. The FBU, GMB, and British Medical Association (BMA) argued that the cost of rectifying the discrimination should not be met by scheme members.

On 4 July 2022, the FBU and the BMA were given permission to judicially review the Government's decision. A judicial review is a type of court proceeding in which a judge reviews the lawfulness of a decision or action made by a public body. In other words, judicial reviews are a challenge to the way in which a decision has been made, rather than the rights and wrongs of the conclusion reached.

It is not really concerned with the conclusions of that process and whether those were 'right', as long as the right procedures have been followed.

The judicial review is expected to be heard towards the latter part of 2022.

TPO Annual Report and Accounts for 2021/22

On 14 July 2022, The Pensions Ombudsman (TPO) published its Annual Report and Accounts for 2021/22.

For more information, see [the press release announcing the publication](#).

TPO McCloud factsheet published

On 20 July 2022, TPO published [a factsheet on McCloud](#).

The factsheet sets out TPO's views on what affected members and schemes can do now and TPO's present approach to dealing with McCloud complaints.

TPO's current general starting position is that it would not investigate McCloud complaints. This is because it acknowledges that the Government is taking steps to address the discrimination with retrospective effect. TPO will, however, carefully look at the facts of each case before deciding whether to investigate.

Examples of where TPO may investigate include, allegations of maladministration, like, failure to explain what is going on and/or engage properly with the member; or investigate where a member is suffering severe financial hardship or other serious injustice and the scheme is not putting in place any interim arrangements to address the injustice within a reasonable period.

ACTION: FRAs to review the information in the factsheet to ensure they do not fall short of TPO's expectations.

TPR Annual Report and Accounts for 2021/22

On 14 July 2022, the TPR published its Annual Report and Accounts for 2021/22.

For more information, see [the press release announcing the publication](#).

Dashboard Accuracy Data Guidance

On 4 July 2022, the Pensions Administration Standards Association published [the Dashboard Accuracy Data Guidance](#).

The guidance highlights the importance of regularly testing data for accuracy. This is particularly important for data that pension schemes will use when matching requests from the dashboards.

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The guidance provides information on how schemes could test their data and what data sources they could use.

We have previously provided [data scoring guidance](#) which includes a matrix for adjusting scores for accuracy. We are in the process of updating our guidance to take account of age discrimination and value data for pensions dashboards.

DWP responds to consultation on the draft pensions dashboards regulations

On 14 July 2022, the Department for Work and Pensions (DWP)

[responded to the consultation on the draft Pensions Dashboards Regulations](#).

The DWP has also published [a summary of the key policies](#). The summary reflects the response to the consultation.

The DWP consulted on the regulations between 31 January 2022 and 13 March 2022, which we covered in [FPS Bulletin 54 – February 2022](#).

Readers may recall that the LGA made a [robust response to the consultation](#), expressing concern over the proposed staging date for the FPS of 30 April 2024 given the conflicting pressures faced by employers and administrators, and the requirement to hold value data which at that point would not reflect remediable benefits. We also noted the difficulty in presenting data to scheme members based on different sets of benefits with different retirement ages.

The LGA was directly quoted within the response at paragraphs 5.14 and 5.16:

5.14. The Local Government Association (LGA) on behalf of the firefighter schemes strongly disagreed with the amount of time proposed. They felt their deadline would not give Fire and Rescue Authorities or their administrators sufficient time to implement McCloud.

5.16. ... The LGA (on behalf of the firefighter schemes) suggested an extended staging window for PSPS. They said that this would allow schemes with the capability to connect earlier to do so, with more time allowed for those with greater challenges.

We are therefore pleased to note that the staging deadline for all public service schemes has been extended by five months from 30 April 2024 to 30 September 2024 and, that the requirement to provide value data has been pushed back to 1 April 2025 at the latest and will only be earlier where a Remediable Service Statement has been issued – paragraphs 5.35-5.36.

In relation to members with different tranches of benefits, the regulations will be amended to allow scheme flexibility to provide “a separate set of values for different combinations of tranches of benefits, along with a retirement date in relation to each.” – paragraph 2.39.

The DWP will amend the draft regulations (‘the Regulations’) to reflect the response. We expect the DWP to lay the Regulations before Parliament in autumn.

[LGA response to further consultation on pensions dashboards](#)

On 19 July 2022, we responded to the further consultation on pensions dashboards.

DWP launched the further consultation on 28 June 2022. We covered this in [FPS Bulletin 58 – June 2022](#). The consultation included proposals on the ‘Dashboard Available Point’ (DAP).

You can find a copy of our response on the [consultations page](#) of the [FPS Regs and Guidance website](#). Our response expressed broad support for the proposals, providing that schemes received enough advance notice of the expected DAP.

[PDP launches consultation and call for input on standards and guidance](#)

On 19 July 2022, the Pensions Dashboards Programme (PDP) launched a [consultation on dashboard standards and guidance](#), and [a call for input on the design standards](#). Both the consultation and the call for input will close on 30 August 2022.

Standards and guidance

The standards detail how pension schemes and dashboard providers operationally, technically or in practice must meet their dashboard duties. The following six standards are published for consultation:

- data standards
- operational standards
- reporting standards
- security standards
- service standards
- technical standards (this comprises of the technical standards, the API standards and technical overview guidance).

The guidance provides further requirements to which pension schemes must have regard when complying with their dashboard duties. The following three sets of statutory guidance have been published for consultation:

- connection guidance
- data usage guide
- early connection guidance

Call for Input on design standards

The PDP also launched [a call for input on design standards](#).

The design standards will provide information to dashboard providers, as well as data providers, about required layouts, content elements, messaging, and user journeys, to ensure a consistently positive experience for users, regardless of which dashboard an individual chooses. The PDP is running the call for input to get feedback and thoughts on their developing ideas for Qualifying Pensions Dashboards design standards from the pensions industry and consumer groups.

Following this call for input, a consultation on the final design standards will run for six weeks.

Support webinars

To support respondents, the PDP hosted three webinars:

- Introduction to standards and the consultation – 21 July 2022
- Connecting to the pensions dashboards ecosystem – 25 July 2022
- Operating within the pensions dashboards ecosystem – 26 July 2022.

Recordings of the webinars can be viewed on the [standards page](#) of the PDP website.

Webinar for potential dashboard providers

Chris Curry, PDP's Principal, recently hosted a webinar providing updates for those interested in becoming a dashboard provider.

The PDP also published [a summary of the main topics relevant for dashboard providers](#). The summary included a link to the webinar recording.

Cyber Risk Made Simple Guide

The Pensions and Lifetime Savings Association (PLSA) has recently published '[Cyber Risk Made Simple Guide](#)'. PLSA produced the guide in partnership with Aon and Crowe.

The guide explains the nature of the cyber threat to pension schemes. It also outlines 15 actions pension schemes may wish to take in response.

HMRC

HMRC publishes Pension Schemes Newsletter 140 and 141

On 30 June 2022, HMRC published [pension schemes newsletter 140](#).

The newsletter includes articles:

- clarifying the rules on paying interest and arrears when equalising for guaranteed minimum pensions
- reminding schemes to migrate from the Pension schemes online service to the Managing Pension Schemes service

[Click here to return to Contents](#)

- on the expected release in spring 2023 of the event report for tax year 2023/24 on the Managing Pension Schemes service
- on a new reportable event from April 2023 for certain public service schemes. This will relate to issuing annual allowance statements. HMRC will consult on legislation introducing this new reportable event later this year
- reminding schemes that they can no longer compile and submit accounting for tax returns for any quarter from 1 April 2020 using the Pension schemes online service.

On 21 July 2022, HMRC published [pension schemes newsletter 141](#).

The newsletter includes articles:

- covering the technical consultation on resolving the low earners tax relief anomaly
- clarifying how to migrate schemes from the Pension Schemes Online service to the Managing Pension Schemes service
- reminding schemes that they cannot compile and submit new Accounting for Tax returns for any quarter from 1 April 2020 onwards on the Pension Schemes Online service
- reminding schemes who need to submit an Accounting for Tax return for the quarter 1 April 2022 to 30 June 2022 that they will need to have migrated the scheme and submitted the return on the Managing Pension Schemes service by 14 August 2022 to avoid interest and penalties.

Clarification received on annual allowance changes

The LGA recently received clarification from HMRC on the changes to annual allowance rules.

We covered these changes in [FPS Bulletin 56 – April 2022](#). These include new requirements on administrators to recalculate annual allowance amounts for previous years in certain situations. Where the recalculation shows an annual allowance excess, the administrator must issue a pension savings statement to the member. They must also tell HMRC about this on an event report.

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In [FPS Bulletin 56 – April 2022](#), we set out that the administrator must tell “HMRC within three months of the date they sent the statement to the member, or if later, by 31 January following the tax year to which the [event] report relates.” This reflects regulation 3(9) of the Registered Pension Schemes (Provision of Information) Regulations 2006:

an event report in respect of reportable event 22, in a case where regulation 14A(6A) or (6B) applies, must be delivered-

- a. within 3 months of the date of issue of the pension savings statement,*
or
- b. if later, on or before 31st January following the tax year to which the report relates.*

Our understanding is that “the tax year to which the report relates” refers to the tax year in which the administrator issues the statement to the member. For example, an administrator issues the statement on 1 October 2023 telling a member they exceeded the annual allowance in tax year 2019/20. The deadline under 3(9)(a) would be 31 December 2023. The deadline under 3(9)(b) would be 31 January 2025. Clarification was sought from HMRC as this would mean the deadline in 3(9)(a) could never apply.

HMRC confirmed that in the above example the deadline would be 31 January 2025. They included an article clarifying the deadline in [pension schemes newsletter 140](#). We understand that HMRC will consider amending the regulations to remove the redundant deadline in 3(9)(a).

Legislation

The Public Service Pensions (Employer Cost Cap and Specified Restricted Scheme) Regulations 2022

On 13 July 2022, HMT laid [The Public Service Pensions \(Employer Cost Cap and Specified Restricted Scheme\) Regulations 2022](#). The regulations come into force on 3 August 2022.

Regulation 3 amends The Public Service Pensions (Employer Cost Cap) Regulations 2014 and sets out the specified margins for the cost cap introduced by the Public Service Pensions Act 2013. The specified margins are the parameters in which scheme costs must remain before corrective action is taken. The margins are currently set at two percentage points above and below the employer cost cap rate. The new regulations amend this to three percentage points.

Last year, HMT reviewed the cost cap process and announced three changes. We covered the review in [FPS Bulletin 50 – October 2021](#). The new regulations implement one of those changes.

HMT intends that all three changes will be in place for the 2020 cost cap valuation.

Events

FPS coffee mornings

Our MS Teams coffee mornings are continuing every second Tuesday. The informal sessions lasting up to an hour allow practitioners to catch up with colleagues and hear a brief update on FPS issues from the LGA Bluelight team.

It is our intention to take a short break over the holiday period and the coffee mornings are set to resume on 6 September 2022, however, we have asked the Pension Dashboard Programme (PDP) to facilitate a session on their latest consultation. As yet we haven't had a response to our request so we therefore cannot commit to a firm date for this session. We will contact our coffee morning distribution list if we are able to arrange a session for August.

[Click here to return to Contents](#)

We are pleased to include the presentations from recent sessions below:

[12 July 2022 – General update: Matthews, scheme valuations and SAB remedy engagement](#)

[28 July 2022 – Remedy eligibility and administrator self-assessment survey](#)

If you do not already receive the meeting invitations and would like to join us, please email bluelightpensions@local.gov.uk. Please note that attendance at the coffee mornings is generally restricted to FPS practitioners and managers.

AGM – 25 and 26 October

We are pleased to announce that booking for the ever-popular Fire Pensions Annual Conference is now live.

The two-day programme allows delegates to network with fellow colleagues and hear the latest news on the Firefighters' Pension Scheme (FPS) from the scheme's key stakeholders. You will hear important updates, including:

- Chair of the Scheme Advisory Board
- The Home Office
- Legal updates

As well as providing the opportunity to network with other FPS stakeholders, there will be interactive and thought-provoking workshops to take part in during the day, on topics such as

- Firefighter compensation scheme
- Discretions
- Pensionable pay

Timings are provided below, and the full programme will be available shortly. Use the links to book your place now. Please note that each day must be booked separately.

[Day 1 – Tuesday 25 October 2022 4:30pm - 6:30pm](#) followed by drinks reception

Primarily for Scheme Managers and Local Pension Board Chairs, day 1 of the conference is the AGM which will provide an update from the Pensions Regulator and will offer the opportunity to network with counterparts in other Fire Authorities.

Following this session there will be a drinks reception on the terrace from 6.45pm.

[Day 2 – Wednesday 26 October 2022 9:30am - 3:30pm](#)

Day 2 of the conference provides delegates with an annual update on the Firefighters' Pension Scheme from key stakeholders. In addition to the main plenary sessions, delegates will have an opportunity to attend workshop sessions.

We look forward to welcoming you to the event!

Useful links

- [The Firefighters' Pensions \(England\) Scheme Advisory Board](#)
- [FPS Regulations and Guidance](#)
- [FPS Member](#)
- [Khub Firefighters Pensions Discussion Forum](#)
- [FPS1992 guidance and commentary](#)
- [The Pensions Regulator Public Service Schemes](#)
- [The Pensions Ombudsman](#)
- [HMRC Pensions Tax Manual](#)
- [LGA pensions website](#)
- [LGPS Regulations and Guidance](#)
- [LGPC Bulletins](#)
- [LGPS member site](#)
- [Scottish Public Pensions Agency - Firefighters](#)
- [Welsh Government Fire circulars](#)

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FPS Bulletin 60 – August 2022

Welcome to issue 60 of the Firefighters' Pensions Schemes bulletin.

If you are looking for information on a certain topic, issue and content indexes are held on the [main bulletin page](#) of the website and are updated following each new issue.

If you have any comments on this bulletin, suggested items for future issues, or a job you would like to advertise, please email bluelightpensions@local.gov.uk.

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Calendar of events

Please see below a calendar of upcoming events relevant to the Firefighters' Pension Schemes. Only those events which are hyperlinked are currently available to book. If you have any events you would like to be included in a future bulletin, please email bluelightpensions@local.gov.uk.

Table 1: Calendar of events

Event	Date
FPS coffee morning	6 and 20 September 2022
Eastern regional group	6 September 2022
SAB	8 September 2022
North-West regional group	14 September 2022
FPS Communications Working Group	16 September 2022
FPS Technical Group	25 October 2022
FPS AGM	25 October 2022 26 October 2022
SAB	8 December 2022

Actions arising

Readers are asked to note the following actions arising from the bulletin:

[Age discrimination eligibility – Factsheet](#): FRAs to review the eligibility factsheet and ensure that appropriate action is taken where necessary.

FPS

Age discrimination eligibility – Factsheet

The [coffee morning held on 28 July 2022](#) had a focus on eligibility for the age discrimination remedy.

As a reminder, to be eligible for remedy, a member must have ‘remediable service’. The Public Service Pensions and Judicial Offices Act 2022 sets out four conditions in [Section 1](#) which must **all** be met for service to be considered ‘remediable’.

To help FRAs and administrators determine which individuals are in scope for remedy we have put together a [guide to eligibility factsheet](#) which sets out the conditions in more detail.

Additionally, the factsheet encourages scheme managers to review the cohort of membership which they have deemed to be in scope. If, after considering the content of the fact sheet, more individuals are deemed in scope, then action will be needed to address this. Full details of what action is needed has been set out in the factsheet. Sample member communications will be provided later.

ACTION: FRAs to review the eligibility factsheet and ensure that appropriate action is taken where necessary.

Abatement guidance updated

Readers may recall that informal abatement guidance was published in [FPS Bulletin 57 – May 2022](#). Since publication, the LGA has been approached by several FRAs asking whether we would be able to share a draft policy.

We are pleased to confirm that Cumbria FRS has given permission for their [retirement, re-engagement and abatement policy](#) to be shared with the sector as an example of best practice – thank you Cumbria FRS!

The [informal abatement guidance](#) has been updated to include a link to Cumbria’s policy at paragraph 51.

Electric vehicles salary sacrifice

Over recent weeks we have experienced an increase in questions which relate to electric vehicles (EV) and salary sacrifice.

Firstly, it is worth noting that it is up to each individual FRA to determine whether EVs meet the requirements of salary sacrifice as what can or cannot be included in a salary sacrifice scheme falls outside of the pension schemes' remit. Detailed guidance can be found at: <https://www.gov.uk/guidance/salary-sacrifice-and-the-effects-on-payee>

If an FRA does deem that EVs meet the requirements of salary sacrifice, then there is a question as to what impact this would have on any pension contributions due.

We can confirm that the FPS 2015 regulations provide for salary sacrifice ([Regulation 17\(1\)\(c\)](#)). They confirm that the member should continue to pay contributions on the amount before the deduction and receive the full value of their pensionable pay.

Technical query log

The [current log of queries and responses](#) can be accessed by practitioners in the member-restricted area of the FPS Regulations and Guidance website. The queries have been anonymised and divided into topics. The log is updated monthly in line with the bulletin release dates.

As a reminder we took the opportunity, while reminding FRAs and administrators of the process to follow to submit a technical query in [FPS Bulletin 58](#), to move the technical queries page to the password-protected area of the website, as it is intended as a dedicated resource for practitioners. Therefore, you now need to log in to access the form and the log of previous queries.

No new queries have been added this month.

FPS England SAB updates

SAB remedy engagement sessions

As we reported in [FPS Bulletin 57 – May 2022](#), the Scheme Advisory Board (SAB) has been invited by the Home Office to take part in a series of joint engagement sessions with the Police SAB to consider scheme specific versions of the Provision Definition Documents (PDDs) which define the provisions of the [Public Service Pensions and Judicial Offices Act \(PSPJOA\) 2022](#) for each area of the 2015 Remedy.

One session is taking place per month between June and December 2022, with two topics discussed at each meeting. These discussions will help to inform the drafting of secondary legislation, ahead of formal consultation early in 2023.

To date, sessions have taken place on interest and eligibility, remediable service statements (RSS) and immediate/ deferred choice, and added pension and transfers in.

Any actions arising from the feedback from the Fire and Police SABs will be taken forward and responded to by the Home Office.

Other News and Updates

The Pensions Ombudsman (TPO) publishes corporate plan

[The Pension Ombudsman's \(TPO\) corporate plan for 2022 to 2025](#) has been published. The corporate plan outlines TPO's key performance indicators, strategic goals and priorities for the period, along with the actions required to deliver those priorities.

The Pension Regulator (TPR) publishes scam prevention strategy

The Pensions Regulator (TPR) has published a new [strategy to combat pension scams](#). The strategy sets out TPR's plan to combat pension scams. It will tackle the scourge of scammers by:

- educating savers about the threat that scams present
- encouraging higher standards and preventing practices that lead to saver harm
- fighting fraud through the prevention, disruption and punishment of criminality.

The strategy supports and complements the work of the Pension Scams Action Group (PSAG – formerly Project Bloom). The strategy sets out the importance of pension schemes protecting savers by being proactive in providing pension scams warnings, driving improvements in protection standards and reporting potential crimes to the authorities.

You can read more about the launch of the strategy in the [TPR press release](#).

Draft LGA response to PDP consultation and call for input

We reported in [FPS Bulletin 59](#) – July 2022 that the Pensions Dashboards Programme (PDP) had launched a [consultation on dashboard standards and guidance](#) and [a call for input on the design standards](#).

The standards detail how pension schemes and dashboard providers operationally, technically or in practice must meet their dashboard duties. The guidance provides further requirements to which pension schemes must have regard when complying with their dashboard duties

To support FRAs and administrators in responding to the consultation, PDP delivered a [coffee morning session on the standards](#) on 24 August 2022.

In addition, PDP ran a series of webinars in July to assist interested parties who were preparing a response. You can find links to [recordings of the webinars](#) on the PDP website.

The deadline for responses is 30 August 2022. We are pleased to share our [draft response to the standards consultation and call for input](#). The draft is still be approved internally before it is submitted, but we do not expect any significant changes to be made.

Data matching guidance updated

The Pensions Administration Standards Association (PASA) has updated its guidance on dashboards data matching conventions. The [PASA dashboards data matching conventions guidance](#) was originally issued in December 2021. It has been updated to include a call to action, set out the next steps being worked on and provide links to other industry guidance. You can read more about the updates and the reasons for them in the [PASA press release](#).

Guidance on Value Data for pensions dashboards

PASA has also published [Guidance on Value Data for pensions dashboards](#). PASA recognises that the regulations are yet to be finalised and that some uncertainty remains. The guidance includes a checklist of steps administrators can take now, despite these uncertainties. These steps will help administrators to:

- gain an understanding of what the Value Data requirements mean for their scheme
- identify where gaps exist, what the options are for filling those gaps and whether they should wait to see DWP's final regulations before making a decision
- decide if there is work they can do in advance of the designated staging date.

As we reported in [FPS Bulletin 59](#), public service pension schemes will have to provide Value Data to pensions dashboards by 1 April 2025, although they can supply it earlier if they choose to.

You can read more about the launch in the [PASA press release – Value Data guidance](#).

Pension awareness campaigns

As part of Pensions Awareness Week, TPO is hosting a [webinar on How to Avoid the Ombudsman](#). The webinar is taking place on 14 September at 11am.

The webinar will be a panel chaired by TPO's Head of Engagement and will have panelists from various areas of the organisation – Early Resolution, Adjudication, Casework Support and Enquiries. The panelists will discuss tips and advice on how to resolve complaints without resorting to the Ombudsman. The session will run for 45 minutes, which includes 15 minutes for audience questions.

The [pension awareness 2022 promotional toolkit](#) includes posters, leaflets and other resources that you and your employers can use to promote the campaign to Scheme members.

Pension Awareness Day takes place on 15 September 2022. You can find a timetable of live events for members that will take place between 12 and 16 September 2022 on the [Pension Awareness Day website](#).

The Association of British Insurers (ABI) and the Pensions Lifetime Savings Association (PLSA) are leading a campaign to boost the nations 'Pension Attention'. The campaign will run from September to November.

You can find files and guidance for the Pay Your Pension Some Attention brand and logo on the [ABI website](#).

Events

FPS coffee mornings

Our MS Teams coffee mornings are set to return in September and will continue every second Tuesday. The informal sessions lasting up to an hour allow practitioners to catch up with colleagues and hear a brief update on FPS issues from the LGA Bluelight team.

The next session is due to take place on 6 September 2022 at 15:00.

[Click here to return to Contents](#)

We are pleased to include the presentations from recent sessions below:

[24 August 2022 – Pensions Dashboards Programme: Update and Standards](#)

If you do not already receive the meeting invitations and would like to join us, please email bluelightpensions@local.gov.uk. Please note that attendance at the coffee mornings is generally restricted to FPS practitioners and managers.

AGM – 25 and 26 October

Booking for the ever-popular Fire Pensions Annual Conference remains open.

The two-day programme allows delegates to network with fellow colleagues and hear the latest news on the Firefighters' Pension Scheme (FPS) from the scheme's key stakeholders. You will hear important updates, including:

- Chair of the Scheme Advisory Board
- The Home Office
- Legal updates

As well as providing the opportunity to network with other FPS stakeholders, there will be interactive and thought-provoking workshops to take part in during the day, on topics such as

- Firefighter compensation scheme
- Discretions
- Pensionable pay

Timings are provided below, and a [draft agenda](#) is now available. Use the links to book your place now. Please note that each day must be booked separately.

[Day 1 – Tuesday 25 October 2022 4:30pm - 6:30pm](#) **followed by drinks reception**

Primarily for Scheme Managers and Local Pension Board Chairs, day 1 of the conference is the AGM which will provide an update from the Pensions Regulator and will offer the opportunity to network with counterparts in other Fire Authorities.

Following this session there will be a drinks reception on the terrace from 6.45pm.

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[Day 2 – Wednesday 26 October 2022 9:30am - 3:30pm](#)

Day 2 of the conference provides delegates with an annual update on the Firefighters' Pension Scheme from key stakeholders. In addition to the main plenary sessions, delegates will have an opportunity to attend workshop sessions.

We look forward to welcoming you to the event!

Useful links

- [The Firefighters' Pensions \(England\) Scheme Advisory Board](#)
- [FPS Regulations and Guidance](#)
- [FPS Member](#)
- [Khub Firefighters Pensions Discussion Forum](#)
- [FPS1992 guidance and commentary](#)
- [The Pensions Regulator Public Service Schemes](#)
- [The Pensions Ombudsman](#)
- [HMRC Pensions Tax Manual](#)
- [LGA pensions website](#)
- [LGPS Regulations and Guidance](#)
- [LGPC Bulletins](#)
- [LGPS member site](#)
- [Scottish Public Pensions Agency - Firefighters](#)
- [Welsh Government Fire circulars](#)

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I = Impact L = Likelihood

HIGH RISK > 15
MEDIUM RISK > 10
LOW RISK <10

Reference	Risk Title	Cause and Effect	Priority (I x L)		Risk Control Residual	Action Required Target Risk
1	Management of the transfer of scheme member affected by the McCloud and Sargeant ruling Risk Owner: Strategic Finance Last Updated: 05 July 2022 Latest Review Date: 05 July 2022 Latest Review By: Joint Head of Finance Latest Review Comments:	Fire Fighters were automatically transferred to the 2015 Home Office Police pension scheme. The position is now in remedy the national working group are working with administrators to deliver an effective settlement Failure to manage the risk on transfer could lead to additional cost exposure and stakeholder concerns	I = 4, L = 3	12	Pension Scheme Regulations and Home Office Guidance, of which the Force acted upon. Continued payment until remedy	Continued monitoring of the national picture and once guidance is issued ensuring that WYPF are on top of this risk. Furthermore, by supplier and WNH engagement we can ensure a full reconciliation of transferred data and ownership
2	Failure to update scheme rules or comply with legislation Risk Owner: Joint Head of Finance Last Updated: 05 July 2022 Latest Review Date: Latest Review Comments: Pension Board discretions still to be agreed	Failure to update scheme rules or comply with legislation resulting in incorrect payments being made or to apply correct discretions following transfer to WYPF	I = 3, L = 3	9	The pensions board are to confirm the new discretions for transfer to WYPF. Milestone planning with WYPF to agree all processes and procedures	positive confirmation of agreed discretionary policy and review in post go live SLA meetings
3	Covid-19 cover and delivery of service during peaks Risk Owner: Joint Head of Finance Last Updated: 21 April 2021 Latest Review Date: Latest Review By: Comments: disaster plans have been reviewed and tested (during the first peak as well), XPS are working from home and social distancing	No skilled workforce would require the enactment of the disaster plan and delivering contingency payroll or project management.	I = 4, L = 1	4	Regular service updates from WNH and WYPF & internal management of information to continue process in case of sickness	Continue to monitor disaster recovery plans and ensuring suppliers are meeting their statutory obligations for adherence to government guidelines and sickness
4	Failure to inform members of pension changes Risk Owner: Joint Head of Finance Last Updated: 05 July 2022 Latest Review Date: Latest Review By:	Failure to inform members of pension changes leading to members not being informed of changes in a timely fashion & potentially stopping timely changes to pension arrangements.	I = 3, L = 2	6	On going discussion and Communication plan with WYPF, Unison, Members & Pensioners to ensure all known changes are communicated to all parties.	Regular checks between WNH & WYPF to ensure effective management of hand over and timely transfer of updates to WYPF data. Risk Owner: Finance and Resources Officer
5	Inadequate reporting to TPR, HMRC, 3rd parties Risk Owner: Strategic Finance Manager Last Updated: 05 July 2022 Latest Review Date: Latest Review By: Joint Head of Finance	Inadequate reporting to TPR, HMRC and third parties.	I = 5, L = 1	5	Ensure it is clear within take on plan the deliverables for the year end returns and other tasks reportable to the TPR and Home Office.	Agree deliver timeframe with WYPF and ensure the full deliverables list is managed by either WNH or WYPF based on deliverable data.
6	Increase in the number of opt outs & none enrollment when joining due to underappreciation of pension benefits, resulting in increased employer costs and reduced employee benefits. Risk Owner: Joint Head of Finance Last Updated: 05 July 2022 Latest Review Date: Latest Review By: Latest Review Comments: Opt outs have stopped, the issue appears to be less long term or engagement with pensions	Increase in the number of opt outs due to underappreciation of pension benefits leading to reduced numbers of active members and the potential for pension schemes to become unviable.	I = 2, L = 2	4	Auto enrolment now requires all new starters to be enrolled into a pension scheme and they have to actually opt out thus potentially reducing the number of opt outs. HR and Payroll to liaise and report on opt outs. The Pension Board conduct annual reviews and liaise with the Home Office. Force to actively promote benefits	HR to remind new recruits of the positive pension scheme, post their 2 year training. Person Responsible: Lead HR Officer Completed, however, the on going nature of this issue is likely to cause national problems, this has been raised at the national pension group and we will locally continue to encourage people to enroll
7	Failure to deliver year end pension statements	Delays in the year end process put pressure on the processing	I = 3, L = 1	3	A delay in the process could lead to fines, reductions in trust and confidence and missing HMRC deadlines	Keep up to date with the existing timeline
8	Data Management	Inappropriate use and transfer on data to Third Parties	I = 4, L = 2	8	Data security mechanisms within Fire, WYPF & Police are appropriate for the management of personal data	Review and ensure audits are undertaken and reviewed

Minutes	every meeting	Minutes	Minutes	Minutes	Minutes	Minutes	Minutes	Minutes	Minutes	Minutes
Fire Fighters Pensions Scheme Administration	every meeting	Fire Fighters Pensions Scheme Administration	Fire Fighters Pensions Scheme Administration	Fire Fighters Pensions Scheme Administration	Fire Fighters Pensions Scheme Administration	Fire Fighters Pensions Scheme Administration	Fire Fighters Pensions Scheme Administration	Fire Fighters Pensions Scheme Administration	Fire Fighters Pensions Scheme Administration	Fire Fighters Pensions Scheme Administration
Update and breaches of Law	every meeting	Update on SLA and breaches of Law	Update on SLA and breaches of Law	Update on SLA and breaches of Law	Update on SLA and breaches of Law	Update on SLA and breaches of Law	Update on SLA and breaches of Law	Update on SLA and breaches of Law	Update on SLA and breaches of Law	Update on SLA and breaches of Law
LGA Bulletin – points of interest https://fpsregs.org/index.php/bulletins-and-circulars/bulletins	Every meeting	LGA Bulletin – points of interest	LGA Bulletin – points of interest	LGA Bulletin – points of interest	LGA Bulletin – points of interest	LGA Bulletin – points of interest	LGA Bulletin – points of interest	LGA Bulletin – points of interest	LGA Bulletin – points of interest	LGA Bulletin – points of interest
Compliance with the Pensions regulator and Code of Practice	annually			Compliance with the Pensions regulator and Code of Practice				Compliance with the Pensions regulator and Code of Practice		
Risk Register	every meeting	Risk Register	Risk Register	Risk Register	Risk Register	Risk Register	Risk Register	Risk Register	Risk Register	Risk Register
Annual Report	annually				Annual Report				Annual Report	
Immediate Detriment position	Annually			Immediate Detriment position				Immediate Detriment position		
Age Discrimination remedy	annually				Age Discrimination remedy				Age Discrimination remedy	
Election of Chair and Vice chair	annually	Election of Chair and Vice chair				Election of Chair and Vice chair				Election of Chair and Vice chair

Local Pension Board Representative Training	annually		Local Pension Board Representative Training				Local Pension Board Representative Training			
Knowledge Management and Representative self-assessment					Knowledge Management and Representative self-assessment				Knowledge Management and Representative self-assessment	
Communication plan (to list communications being sent)	Annually ?		Communication plan.							
Data improvement plan	Annually ?				Data improvement plan					
Proposed discretions							Proposed discretions (Postponed from July to await new CFO in post)			
Firefighters pension scheme administration – annual update	annually			Firefighters pension scheme administration – annual update						
Abatements					Abatements					
Local Pension Board policy review	Every meeting – review different policies to ensure up to date	policy review	policy review	policy review	policy review	policy review				