



## **NORTHAMPTONSHIRE FIRE AND RESCUE AUTHORITY**

### **PENSION BOARD MEETING**

**Tuesday 17<sup>th</sup> December 2024**

**10:00-11:30**

**Walker Room Darby House and Microsoft Teams**

**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](mailto: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			
2	Declarations of Interests			
3 (pg 3)	Meetings and Action log 24 <sup>th</sup> October 2024	Chair	Report	
4 (pg 9)	WYPF Month Report – review	HS	Report	
5	Update on any breaches	HS	Verbal	
6	IDPRS	HS	Verbal	
7 (pg 34)	Risk Register	NA	Report	
8	Immediate Detriment Position	HS	Verbal	
9	Age Discrimination remedy	NA	Verbal	
10	Knowledge Management and Representative Self-Assessment & Pension Board Training session	Chair/ NA	Verbal	
11	Annual Benefits Statements numbers and figures	WYPF/ NA	Verbal	
12 (pg 35)	Proposed Discretions	NA	Report	
13 (pg 41)	Data improvement plan (CF from October meeting)	NA	Report	
14 (pg 47)	Agenda Plan	VA / KO	Report	
15	AOB	Chair		
16	Confidential items – any	Chair		
17	Resolution to exclude the public	Chair		
	Future Meetings: <ul style="list-style-type: none"> <li>- 17th December 2024</li> <li>- 25<sup>th</sup> March 2025</li> <li>- 7<sup>th</sup> July 2025</li> </ul>			

## Agenda Item : 3

NFRS Pension Board meeting NOTES AND ACTION LOG –24<sup>th</sup> October 2024

**Attendees:** Paul Bullen (PB); Nick Alexander (NA); Vaughan Ashcroft (VA); Nikki Watson (NW); Aiden Philips (AP); Don Crook (DC); Cat Moule (CM); Helen Scargill (HS); Kate Osborne (KO);

	Issue	Actions	Comments
1	Welcome and Apologies for non- attendance		<p><b>Apologies; Simon Tuhill (ST); Helen Scargill (HS)</b></p> <p>Welcome; Paul Bullen Chair, Don Crook (DC); Matthew Mott (MM)</p>
2	Declarations of Interests		
3	Meetings and Action log 18 <sup>th</sup> July		<ul style="list-style-type: none"> <li>- NA shared slides – NA to recirculate</li> <li>- NA – Training options – NA to chase this up to find independent and appropriate training. Risk as training – HS send another risk register as best practise. Also to better understand the information members are receiving. MM – annual benefits statement training possible. MM to discuss with HS or David Parrington.</li> <li>- KO action – separate action log</li> <li>- CM – yes online pension sign up action complete</li> <li>- HS – email Stuart – unknown. – MM to follow up</li> <li>- AP – promote training events – ongoing with union partners</li> <li>- CM – opt in or out – further work to review 12 month figures. 1 or 2 per month opting out. May change with auto enrolment from Jan. – CM to report next board post Jan</li> <li>- CM – survey response – national – Yes responded.</li> <li>- Agenda plan updated</li> <li>- AP – recruitment discussions – Jim Dorrill meeting regarding recruitment. This has not taken place due to illness. CF</li> </ul>
4	WYPF Monthly Report – October 2024		<ul style="list-style-type: none"> <li>• General updates – MM</li> <li>• Monthly returns are up to date which is good.</li> <li>• Annual benefit statements – not as good as hoped. Active members have produced those who are not in scope for remedy. Those in scope have not received due to software development delays. Reported to regulator as a breach.</li> <li>• Not ideal. Working with partners to resolve. But no material update</li> <li>• Pension saving statements out of scope have been delay in usual way.</li> <li>• Are some we aren't aware of or never had breaches we cannot provide</li> </ul>

			<ul style="list-style-type: none"> <li>• Re-request payroll information for pensions saving statement for members.</li> <li>• LGA – traffic light – started processing with green category. Some have gone out to members. Working to clear outstanding</li> <li>• Matthews – processes a number of these cases (June July and September reports contain this information)</li> <li>• CCOP – fairly sure compliant. Compliant with code 14 cannot see why wouldn't still be compliant.</li> <li>• Few amber which will be examined to improve offer – but no concern. We meet with code</li> <li>• Employer training sessions have been held and running through October</li> <li>• Pre-retirement seminars have been out to infinity protect.</li> <li>• Website has changed and updated – there are some recalls. Please give feedback to WYPF around this</li> <li>• Client meeting updates – RMC offsetting guidance – administration forum 14<sup>th</sup> Sept. – working progress</li> <li>• LGA – asking GAD for proformas</li> <li>• GAD providing further calculator on other things</li> <li>• KPIs form part of monthly report – there are some Q2 that haven't been met. August – 2 not met. Clarification given on death in requirement processes.</li> <li>• Pension estimates have been slow – but looking to review internally.</li> </ul> <p>Questions</p> <ul style="list-style-type: none"> <li>- NA – procedural – do we know why we missed other ones SLA? Is there an underlying reason? Why we didn't hit KPIs – MM – no there doesn't seem to be a trend. There is just a high level of work and manual calculations while systems are catching up. Concerns around estimates. Touched upon in client meeting. Internal review expected.</li> <li>- NA – concerned about the impact on NCFRA and fire fighters feelings and opinions of WYPF.</li> <li>- National Fraud Initiative – interested in contacting about abatements? –</li> <li>- Action – MM – process around estimates needs looking at</li> <li>- Action – MM – contact at WYPF regarding abatements</li> <li>- AP – June leaving – January onwards eligible to leave – modified buy back not resolved. These issues are impacting fire fighters –</li> <li>- NW – has been contacted by induvial planning to retire in feb – hasn't received figures? When might people be notified when they will receive figures? – NW – number of people awaiting tax liability re: pension? – MM – majority have been done</li> </ul>
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			<p>or will have been done by end October – those higher earners will have breaches. Likely to receive this month.</p> <ul style="list-style-type: none"> <li>- MM – if you do have number concerned please let MM know and they will examine WYPF position. On both retirement estimates and tax liability.</li> <li>- NA are we safe to assume anyone with a tax charge this year they will receive notification by end 2024. MM – let MM know and they will look into this.</li> <li>- ACTION – send MM list of names to examine</li> <li>- DC – work in progress from previous reports. Where are previous reports? – ACTION KO to send Don previous reports.</li> <li>- DC – transferred into Northants fire. Been with service since August 2023. Pension has disappeared from old provider but now no longer appears with WYPF. Causing nervousness. Want to understand this is being recognised? – MM – understand this nervousness. WYPF and previous FRA will still hold this record. MM take note and will look into this.</li> <li>- CM – any requirements that I receive where they are confirmed the retirement notification is done – PSS communication is in place. CM – once an official retirement has come through we do put declarations in and obtain data as quickly as possible. If anyone is unsure about state please speak to CM. MM – this would be appreciated.</li> <li>- CM – trying to implement a new process of notification and communication with fire colleagues requesting estimates.</li> </ul>
5	Update on any breaches		<ul style="list-style-type: none"> <li>- Mentioned above.</li> <li>- NA – no breaches beyond this issuing of statement. There has been a notification to pensions scheme regulator about this. it will also be included in NFRA return.</li> </ul>
6	IDPRS		<p>Internal Dispute Resolution Process</p> <p>MM – nothing aware of in this regard. No new cases NA – nothing from NA perspective.</p>
7	Compliance with the Pensions Regulation and Code of Practise		<ul style="list-style-type: none"> <li>- NA – confirm beyond the statutory report we are in accordance with our procedures and guidance. We still expect to meet the statutory deadlines on march 31<sup>st</sup>.</li> <li>- Anything that is likely to put members in financial detriment will be raised with the board.</li> <li>-</li> </ul>
8	Risk Register		<ul style="list-style-type: none"> <li>- NA – shared risk register – will circulate after meeting</li> <li>- Feedback from previous meeting is understatement of inaccurate data – agreed we would look at failure to deliver year end pension statements</li> <li>- Position now – failure – has come around. Reality is we have mitigations in place and do have ability to deliver RSS before 31/03</li> <li>- Continue to support WYPF prioritise items.</li> </ul>

			<ul style="list-style-type: none"> <li>- The more we are able to feed through CM around requests the more ability we will have to hold WYPF in account. Keep CM in loop!!!</li> <li>- RSS – put up to 12 because we have until 31<sup>st</sup> March to deliver – on both red and amber risk there is the risk around accuracy of data provided to WYPF. (in relation to data through third part – West Northants).</li> <li>- Mitigations – to arrange specific client meeting to ensure accuracy and clarity of information being sent to WYPF is there – ACTION. MM &amp; NA &amp; CM – to include dashboard data</li> <li>- Other Risks have broadly remained unchanged.</li> <li>- MM – re-enrolment – discussions with LGA – not fire specific – there might be questions asked around numbers of opt outs? – raise awareness to Board.</li> </ul>
9	Annual Benefits Statement		<ul style="list-style-type: none"> <li>- Those out of scope 100% complete</li> <li>- MM can get numbers and figures for next meeting – December</li> <li>- NA would appreciate numbers in advance of December Pension Board.</li> <li>- ACTION – MM – identify issues in preparation for December meeting so we know which colleagues will need additional support.</li> <li>-</li> </ul>
10	Data improvement plan		<ul style="list-style-type: none"> <li>- NA – information requested from West Northants but only have half the data.</li> <li>- NA – now need to move into operational focus</li> <li>- As we don't have all the data it is difficult to give an update</li> <li>- ACTION – CF this item into December Board.</li> </ul>
11	Communications update		<ul style="list-style-type: none"> <li>- CM has sent out a number of communications. Have had all national updates published on fireplace. Actively contacting members due for retirements and number of communications around Mathews case.</li> <li>- There was a minor data breach for Matthews – 7 members letters were sent to the wrong address and name (mix up). Response from a few after requesting destruction.</li> <li>- CM and NA have discussed changes and improvements to avoid future issues around this</li> <li>- Matthews – now trying to get to a calculation point so there will be communications around individual impact. Likely calculations will baseline on national average. Average Contributions Assumption</li> <li>- CM – pending comms around pension savings statements, process and timelines.</li> <li>- NA – is there anything in addition that the board would like communicating??</li> <li>- PB – is it worth having a comms plan? – NA there was previously but it was superseded by changes. CM and NA to look at previous plan and update</li> <li>- PB – data breach – reported to DPO? - NA YES</li> <li>-</li> </ul>

12	Pension Board Training Session		<ul style="list-style-type: none"> <li>- Pending</li> <li>- NA – if any members would like specific training please speak to NA!!</li> <li>- NA – share previous training slides to DC – tasked to Julie James.</li> </ul>
13	Agenda plan		- Data improvement plan to move to December
14	AOB		- NA – to confirm we need to hold December meeting – MM to confirm there will be someone to attend as it is required.
12	Confidential items – any	Chair	
	<b>Resolution to exclude the public</b>	Chair	
	<b>Future meetings</b> <ul style="list-style-type: none"> <li>- 17th December</li> <li>- 25th March 2025</li> <li>- 7th July 2025</li> </ul>		

Action No.	Date of meeting action raised	Issue Identified	Proposed Action	Owner	Progress Update or Final Outcome	Date Closed
1	18/07/2024	Training slides not received by all board members	NA to recirculate	NA		
2	18/07/2024	training options	NA to chase up information to source independent and appropriate training	NA		
3		potential training on annual benefits statement	MM to discuss with HS or David Parrington	MM		
4	24/10/2024	Separate action log from minutes	KO to create action log	KO	COMPLETE	29/10/2024
5	18/07/2024	unsure if HS has asked Stuart about members who havent signed up	MM to chase HS for update	MM		
6	24/10/2024	further work required around opt in and opt out this is ongoing. CM is working to review the 12monthly figures.	CM to bring report to the March Pension Board to raise the numbers	CM		
7	18/07/2024	recruitment of future board members	AP, DC and Jim Dorrell to meet to discuss	AP, DC		
8	24/10/2024	issues around delays with estimates	WYPF are looking at this process	WYPF		
9	24/10/2024	NA would like to discuss abatements, in light of national fraud initiative documents	to meet regarding abatements	NA, MM		
10	24/10/2024	NW raised concerns from a member who intend to retire in Feb and not recived estimates	NW and MM to share information about individual concerned to see when they might recive their information	NW and MM		
11	24/10/2024	members reciving notifications about tax charged within timescales	NA to send list of names of those potentially effected for MM to look into	NA, MM		
12	24/10/2024	DC has not has sight of previous WYPF monthly reports to compare figures	KO to share the reports with DC	KO	COMPLETE	18/11/2024
13	24/10/2024	issues faced by members regarding infomration from WYPD	CM is developing new process, requests members contact her to dicuss concerns so CM is sighted and can take action with WYPF where needed. ALL encourage members to contact CM in first instance.	ALL		
14	24/10/2024	assessment of data accuracy being received from third party.	to include dashboard data	MM, NA, CM		
15	24/10/2024	Annual Benefits statements numbers and figures	MM to provide data to be presented at December meeting, including any issues to be flagged so additional support can be put in place where needed	MM		
16	24/10/2024	provide update on data improvement plan after all data has been recived from West Northants	CF to December Board meeting	NA		



# Monthly Report

November 2024

Northamptonshire Fire Authority



**West Yorkshire Pension Fund**

Prepared by:

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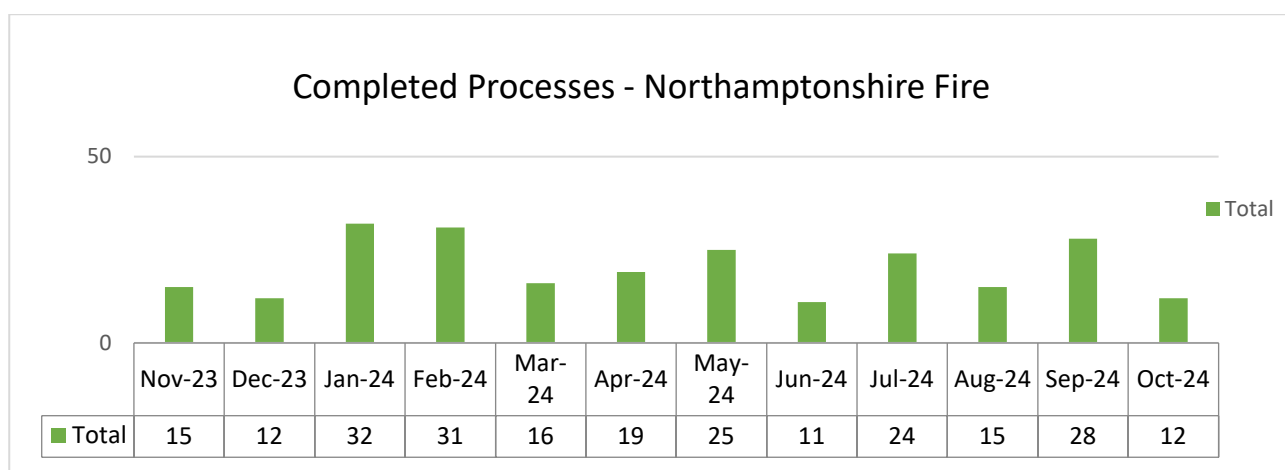


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## 1.Completed processes

1 to 31 October 2024						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Change of Address	3	20	3	85	100	2
Deferred Benefits Into Payment Quote	1	35	0	85	0	50
Deferred Benefits Set Up on Leaving	2	20	0	85	0	174
NI adjustment to Pension at State Pension Age	1	20	1	85	100	18
Pension Estimate	2	10	1	90	50	34
Pension Set Up/Payment of Lump Sum	1	3	1	85	100	2
Retirement Actual	1	10	1	90	100	3
Transfer In Quote	1	35	1	85	100	26
Monthly Pension	469	Pay date	469	100	100	

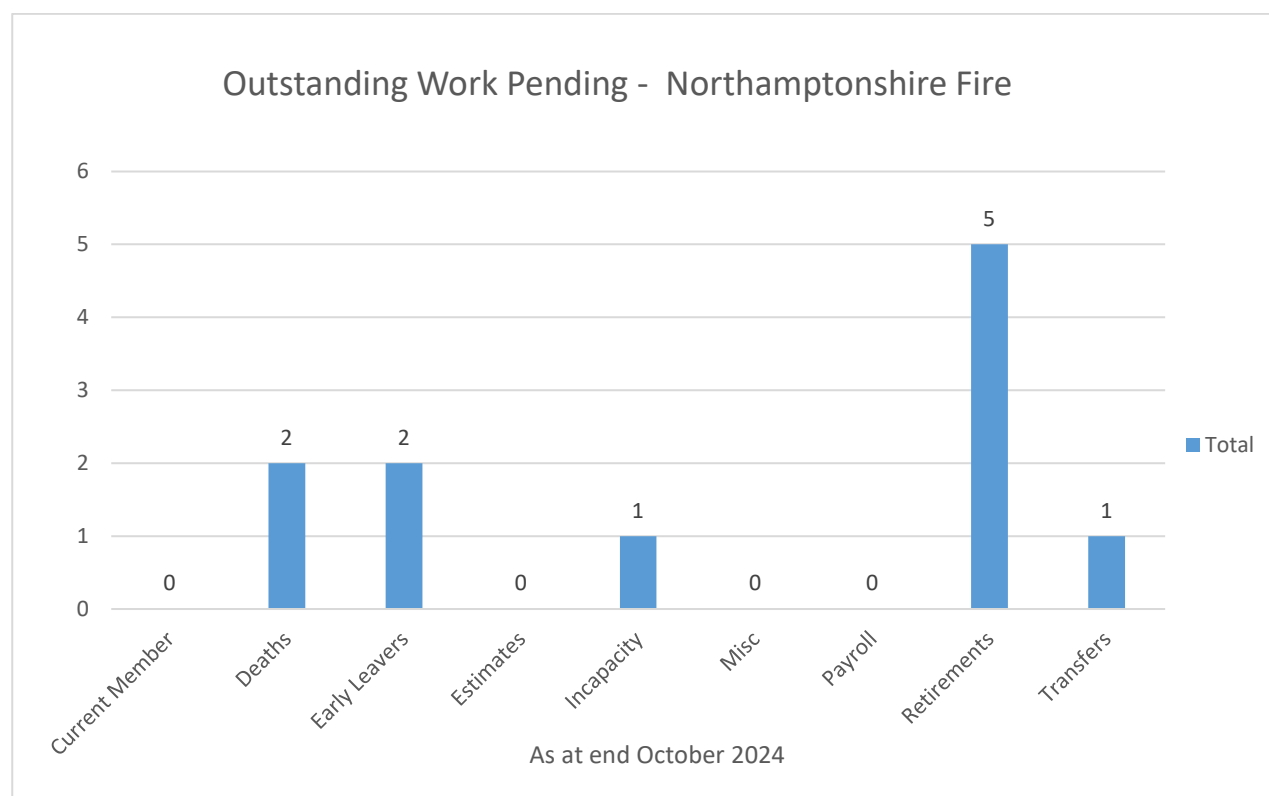
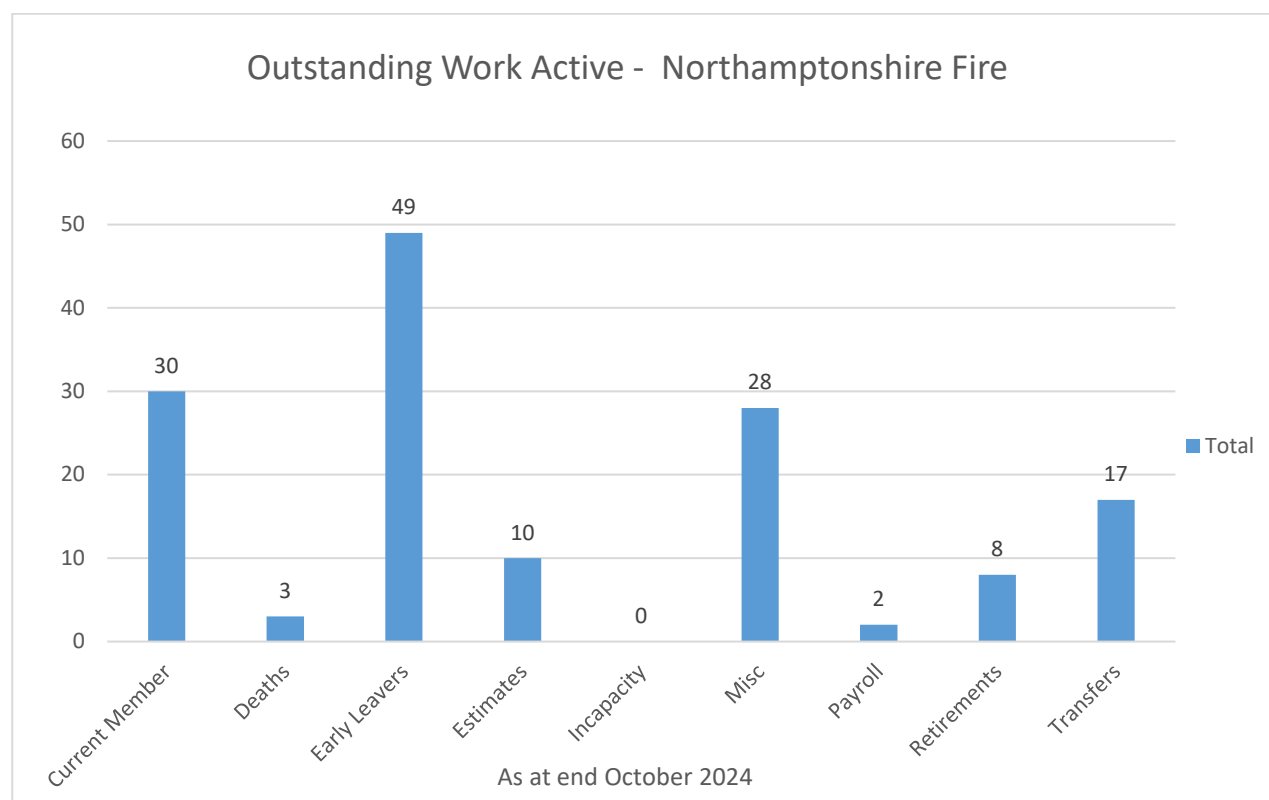


**Deferred Benefits Into Payment Quote** did not meet as there was an ongoing query with the FRA regarding the members pay.

**Deferred Benefits Set Up on Leaving** did not meet due to the records awaiting CARE revaluation, however, the members did receive confirmation within 2 months of WYPF receiving the leaver information that they have a deferred benefit. This meets the statutory requirements

**Pension Estimate** did not meet because of high volumes, estimates are taking around 8 weeks to process. Estimates with an intended retirement date of 3 months or more in the future are not processed until the more urgent estimates with a retirement date within 3 months have been completed. We are discussing ways in which we can improve the performance in this area.

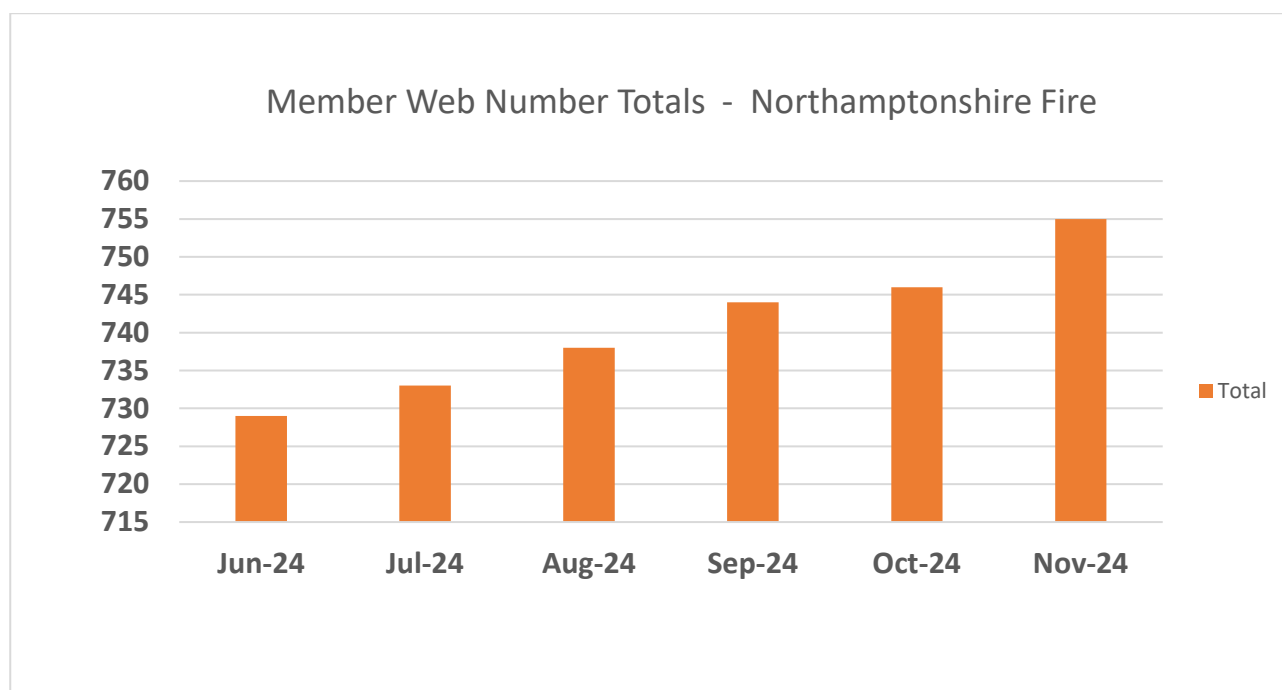
## 2. Work in Progress



### 3. Member Web Registrations

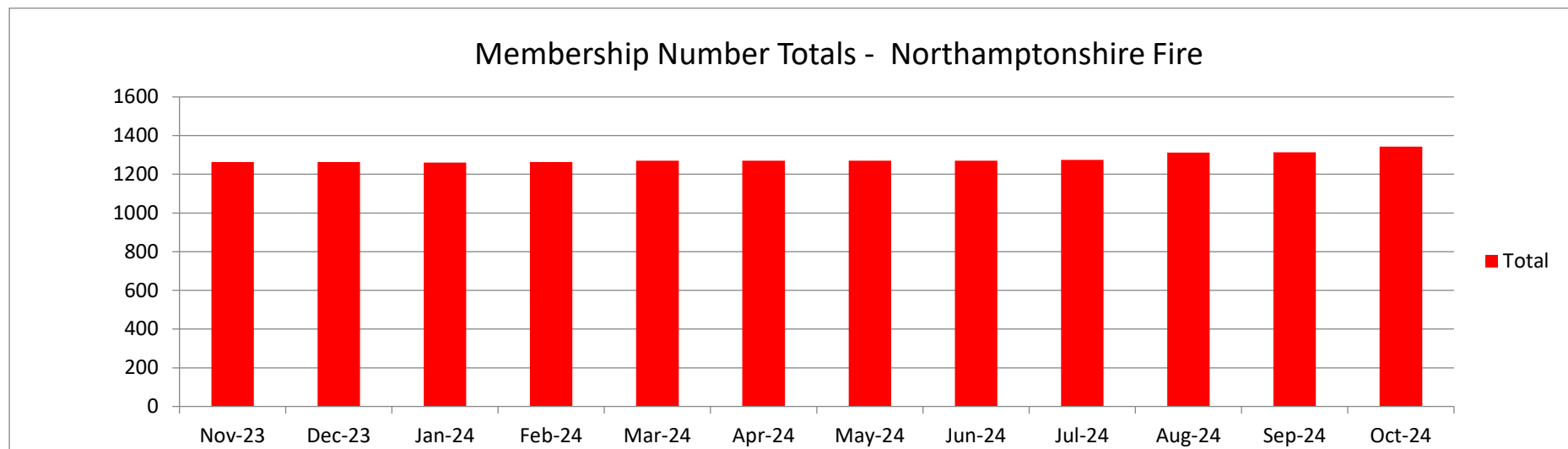
The number of members signed up to member web are:

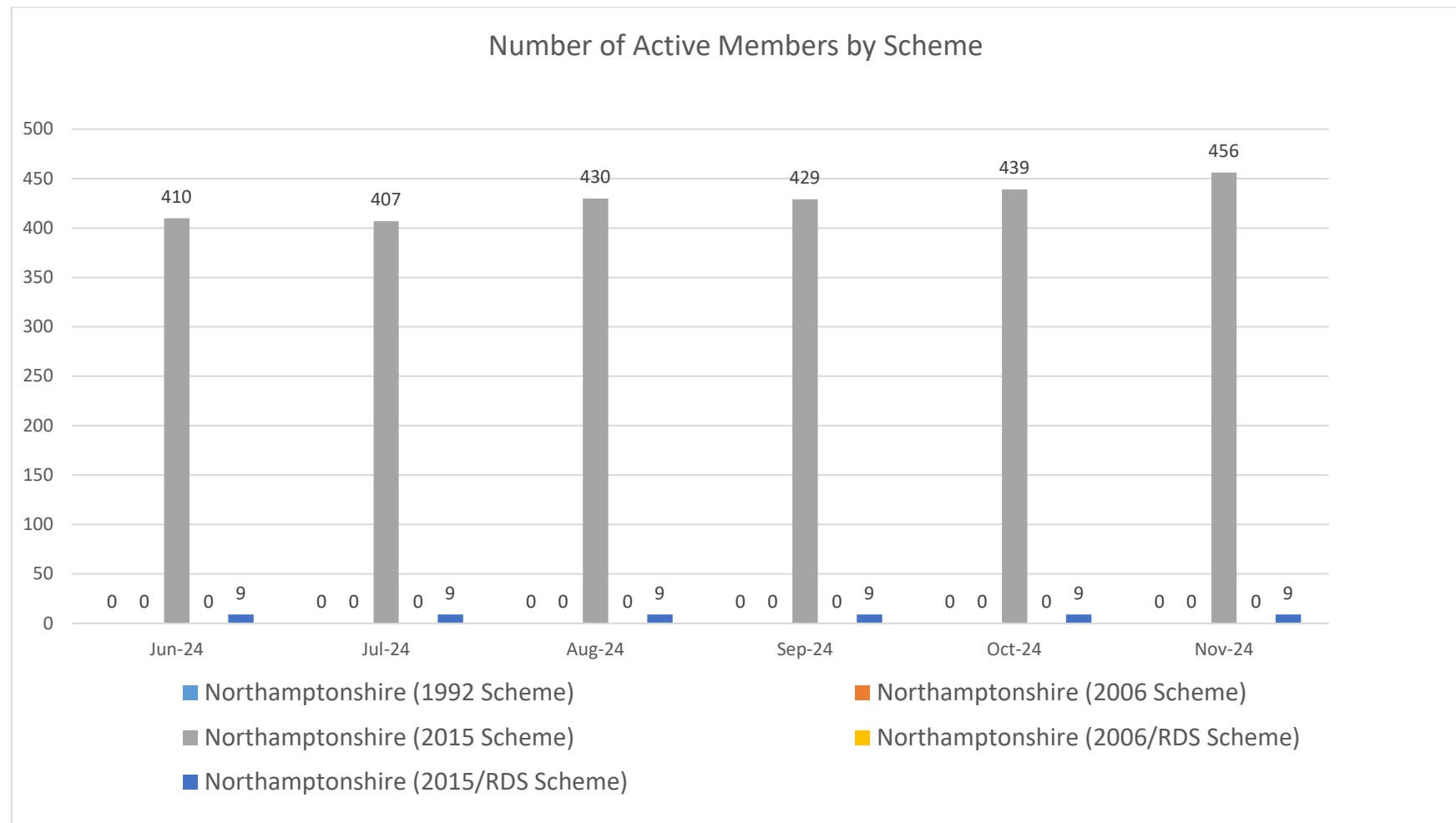
Status	Number
Active	293
Pensioner	271
Pensioner Ex-Spouse	0
Beneficiary Pensioner	18
Deferred Ex-Spouse	0
Deferred	173



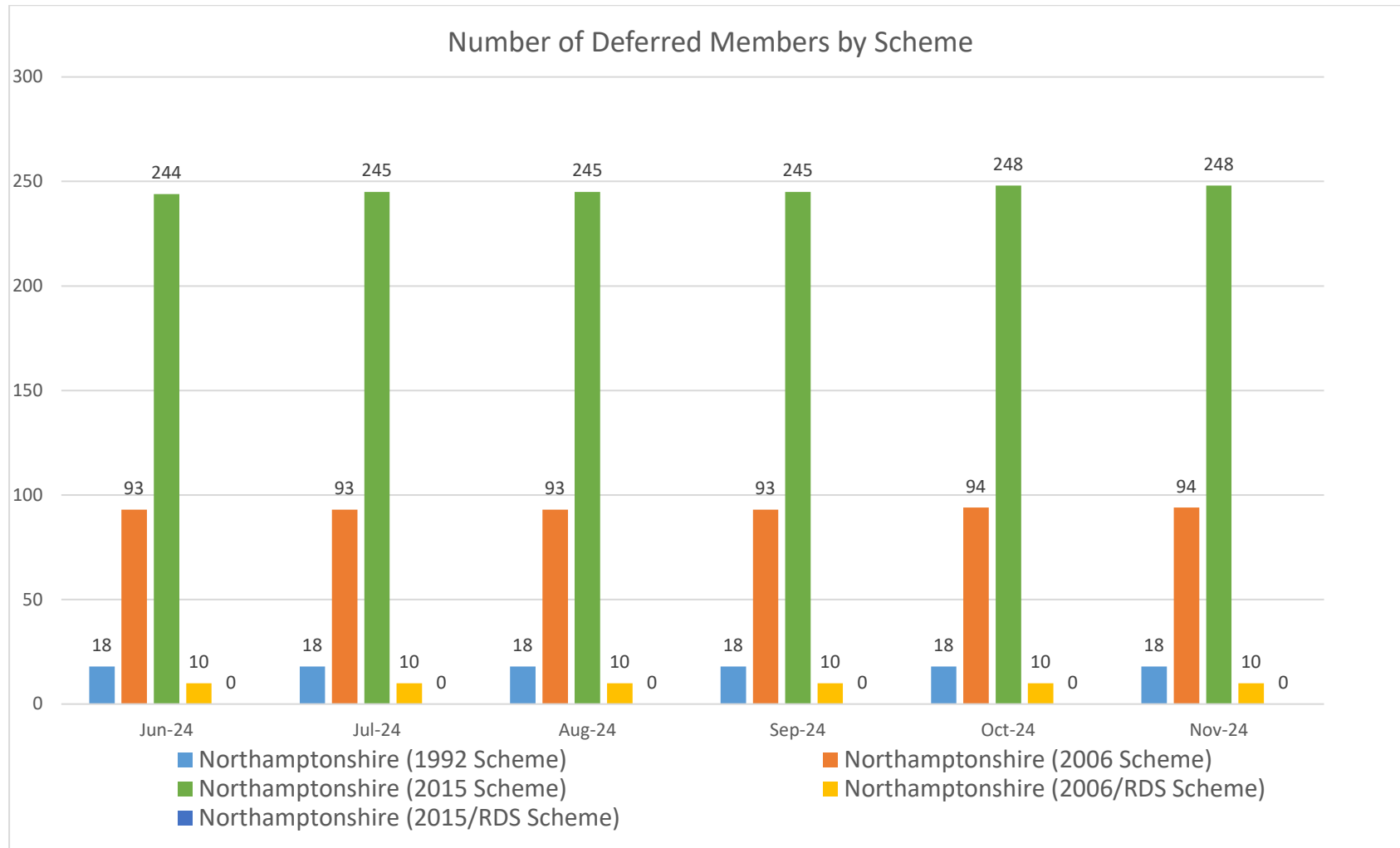
## 4.Membership Numbers

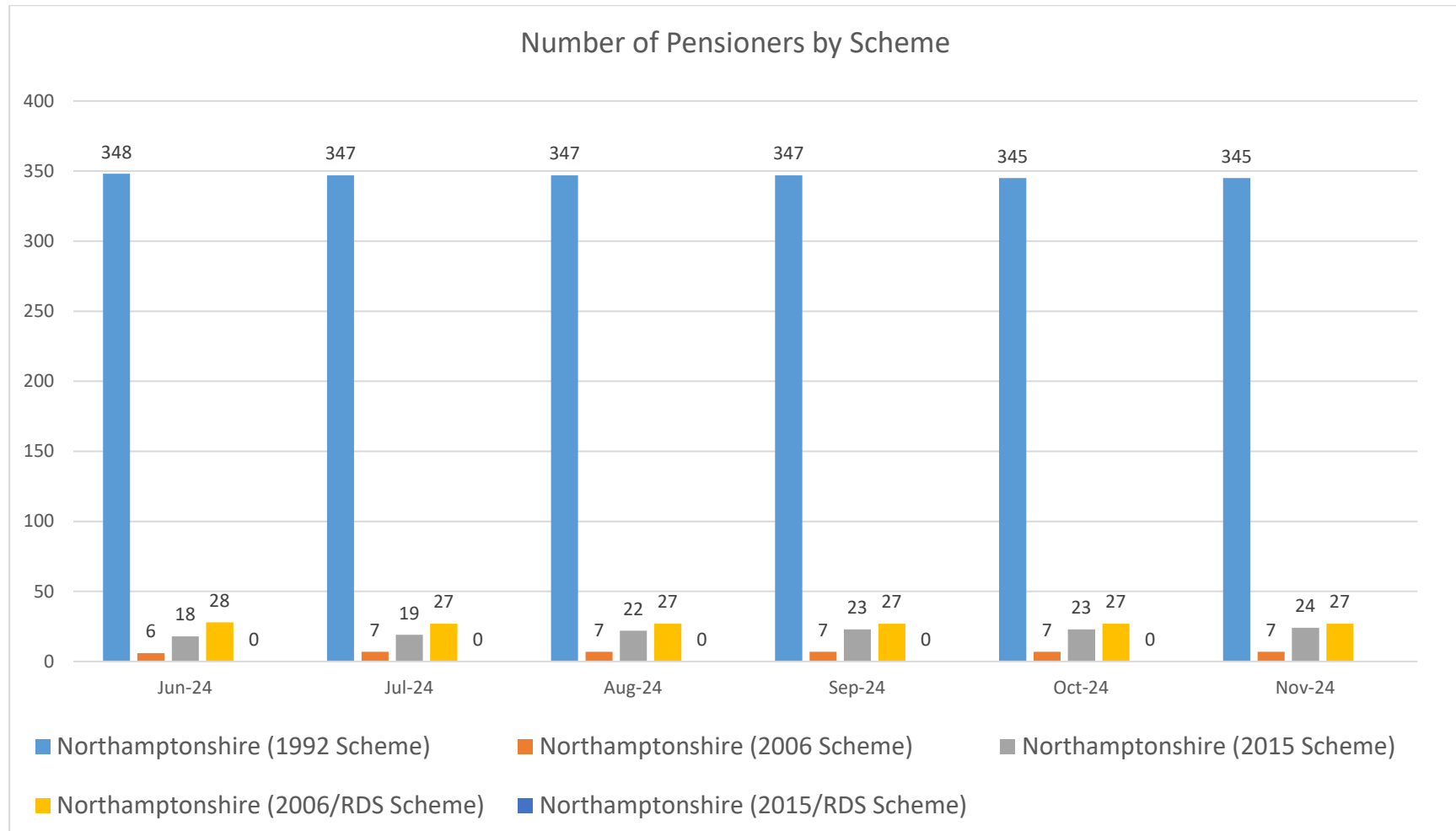
Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Northamptonshire (1992 Scheme)	0	18	345	58	0	0
Northamptonshire (2006 Scheme)	0	94	7	1	10	0
Northamptonshire (2006/RDS Scheme)	0	10	27	0	0	0
Northamptonshire (2015 Scheme)	456	248	24	1	5	30
Northamptonshire (2015/RDS Scheme)	9	0	0	0	0	0











## 5. Administration Update

### Annual Scheme Return

We are currently unable to complete your scheme return as we are still waiting for you to confirm that we hold the correct details for your pension board.

Our technical service manager Tracy Weaver has issued an email to you requesting the data and a subsequent reminder on 11<sup>th</sup> November 2024.

It is your legal responsibility to ensure the return is completed and submitted by 22 November 2024. However, we are unable to do this for you until we have received a reply to the emails. Please could you respond as soon as possible to Tracy - [tracy.weaver@wypf.org.uk](mailto:tracy.weaver@wypf.org.uk)

### Age Discrimination Remedy – Immediate Choice members (red cases)

In Bulletin 86 LGA have said “Local Pension Boards are encouraged to monitor the production of remediable service statements as part of their regular updates”

The issue is that even if FRAs agree to process the ‘red’ cases WYPF are still not in a position to do the calculations. This is because of our current understanding below:

No pensions administrator has been able to work through the HMRC guidance in their newsletter.

Both GAD and SPPA believe there are gaps in the guidance produced by HMRC and these issues are to be raised with HMRC shortly

One administrator has produced a simplified calculator which GAD Have agreed to look at and check if it produces the same results as the SPPA calculator. If it does that GAD and Home Office have agreed to provide guidance and calculation examples for the standard cases WYPF have agreed to send GAD examples of some non-standard cases and these will be used to check against the HMRC guidance and any further gaps highlighted

We are also awaiting the interest calculator from GAD which is needed for the re-assessment of the original unauthorised lump sum tax charge

We also don’t know how long it will take GAD to supply what we need but suspect it will be a number of weeks before WYPF have all the information required to process these red cases.

### Age Discrimination Remedy – Immediate Choice members (green cases)

Wypf are continuing to work through the green cases, but these are manual calculations which take time to process. We hope to have the majority completed in the next few weeks

### Valuation

WYPF is not in a position to provide scheme data post rollback. We have, therefore, been discussing the matter with LGA and GAD and they have provided the following information.

#### GAD’s position is that we:

Need data in the new specification format.

*Would strongly prefer to have the Fire England funds’ (stock) extracts this calendar year and ideally by 1 December.*

Are prepared to receive extracts prior to McCloud rollback.

Are content to receive movement data by close Feb.

Want to receive clarifications/small supplements on data (e.g. any emerging cross cutting issues)

Do not want to receive multiple data extracts (e.g., pre-roll back this year, further post-rollback stock data extract(s) next year)

## Reasons

Given present and future work pressures at both administrator and GAD, we are very keen to avoid multiple data extracts. We are aware that administrators are currently busy are likely to remain so (March deadline for McCloud RSSs if not issued previously, dashboard implementation work, etc). Similarly GAD are producing valuations for all major public service schemes between 2024 and 2027.

To have results in time for scrutiny and implementation by April 2027 it is essential that we start processing stock data on time (Movement data processing is dependent stock data processing and so can start later).

Not knowing the outcome of rollback will add some uncertainty to the value of liabilities.

However, the speed of progress of the Matthews remedy means that Matthews is likely to a larger source of uncertainty than McCloud (even if we do not have McCloud rollback data for the 2024 valuation).

We are to engaging with the Fire auditor community to manage annual financial reporting expectations – but there remains a possibility that auditors raise concerns if fire authorities prepare 2024/25 financial disclosures using data collected as part of the 2020 valuation.

WYPF have confirmed the valuation data extract will be provided pre rollback and our intention is to provide them by 1 December. However, considering the delay to the valuation exercise due to ongoing conversations with GAD and the numbers of FRAS we provide data for, some extracts may be provided by 31 December.

WYPF have commenced the valuation exercise.

Contact for valuation purposes – [Omaira.Dean@wypf.org.uk](mailto:Omaira.Dean@wypf.org.uk)

## Meeting with SAB

WYPF are meeting with the SAB in December. We will provide an update on ABS-RSS, IC Red Cases and Valuation

## SAB RSS Reporting

The SAB has contacted FRAs with regards to RSS output. FRAs will not be able to provide this information without assistance from WYPF. We were not expecting such as request, there was no advance warning or communication, and consequently WYPF do not have the necessary reports to comply with it.

We are treating this request as a priority and discussing with IT the possibility of developing reports. If it is possible to develop reports we hope to have data for you by the end of November. If it is not possible we will notify all FRAs as soon as we know.

## Matthews

As more clients move through the Matthews process, it is a good opportunity to remind you of our guidance as follows.

If you have cases that you wish to send to us, please can you forward the required documents by email to **both** the WYPF main email [pensions@wypf.org.uk](mailto:pensions@wypf.org.uk) and our new Matthews project email address [Matthews@wypf.org.uk](mailto:Matthews@wypf.org.uk)

If you have a specific Matthews query, please email Laura directly at [laura.taylorson@wypf.org.uk](mailto:laura.taylorson@wypf.org.uk)

## **Format of the Emails – this will help us to index the emails more easily.**

**In the Subject:** Matthews: FRA Name: Member Number if already set up on UPM: Status of the case to process – i.e. Active, Deferred, Pensioner

**In the body of the email** please can you give us a brief description of what is happening with this member for example:

Active member record to be updated due to Matthews in preparation for retirement.  
New Special Pensioner Member – retirement from deferred no record currently set up on UPM

## **Documents Required:**

### **All cases**

The Individual Statement of Details sent to the member

The Options Election Form

A pdf copy of the calculator output with **and** without Commutation

Calculated at date of election for active and deferred members.

For pensioner members, the original calculation to match the member statement in order that we have a record of what has been sent to members by the FRA in case of query.

### **Pensioner Members**

For pensioner members, please send the GAD Calculator output in a CSV file format – this enables us to import the data back into the GAD Calculator, amend the calculation date and apply the interest and arrears due to the date the member is paid.

### **First Time Pension Scheme members**

If the person is **NOT** already a pension scheme member, we will need a new starter form to set up their record – this document can be found here <https://www.wyph.org.uk/fra-zone/fra-forms-guides-and-factsheets/>

Please ensure that you have verified the date of birth for all members before sending the documents to us.

### **Matthews Communications:**

To perhaps help reduce calls to both yourself and WYPF, could we suggest when you email the above documents that you also email the member to let them know you have sent the required information. If you could also add that WYPF are dealing with a high volume of cases, we hope to process cases in 3 months and we are not in a position to acknowledge receipt of the data.

### **Requests for Data to complete GAD Calculator:**

We have received a handful of requests for the lump sum commuted at retirement where the member now has the option to convert standard to special membership and the member left after 31/03/2015.

We have referred a query to GAD regarding the calculation of this amount and are currently waiting for a reply.

If you can make a list of the cases you require this information for and hold them at your end that would be helpful. We will then be happy to receive a list once we let you know the GAD guidance has been received.

## Consultation on inheritance tax on pensions

The Government has launched a [consultation on Inheritance tax on pensions: liability, reporting and payment](#). The proposed changes would mean that:

Death grants would be subject to Inheritance Tax from April 2027

Personal representatives would calculate whether any Inheritance Tax was due, and pass on the relevant information to the pension scheme administrator

Pension Schemes would be responsible for paying and reporting to HMRC any Inheritance

Tax deducted from a death grant.

This consultation closes on 22 January 2025.

## Children's Pensions and Apprenticeships

At the last Fire Technical meeting there was a decision made that the Apprentice and apprenticeships meets the definition of a vocational course because they've got to do a minimum of 20% of the job whilst in training and both LGA NPCC and the Home Office all agree that an apprenticeship is a vocational course, and that the child is entitled to receive their children's pension.

WYPF are proposing to adopt this but because FRAs are the scheme managers, you need to agree this decision.

Action – FRA to contact Helen Scargill at WYPF if you do not want WYPF to make this change. If you do not get in touch then this will be taken as your agreement to our proposal.

## 6. Communication & Training

### Employer Engagement

The remaining Autumn 2024 series of employer training webinars have now been completed and work will shortly commence on our next set of session. If there is anything specific you would like us to cover, please let David Parrington know.

### Member Engagement

Affinity Connect meeting are continuing with dates for upcoming sessions, this will include an additional date due to demand on the 18<sup>th</sup> December 2024.

Event Date	Event Category
26 November 2024	Online Seminar
17 December 2024	Online Seminar
18 December 2024	Online Seminar

These sessions can be booked via our website [here](#)

## Staff Update

Two Pensions Officers have recently been recruited and joined Team Fire on a full time, permanent basis. Leon Donoghue joined us on 23<sup>rd</sup> September and Haleema Khan joined us on 28<sup>th</sup> October.

## 7. Member Update

None

## 8. IT Update

### TPR Dashboard Readiness Survey

WYPF have received many queries about the TPR survey.

Clearly much of the information requested by TPR is unknown to FRAs, therefore, we have produced a template of correct answers based on our current understanding for each FRA to submit to TPR.

Some of the questions (about DC) are not relevant for FPS, if you can complete the survey without answering them, great. If not, any of the answers will do – they are all wrong! An apology – we gave you the wrong answer for the AVC question – you're all aware that there are not any for the FPS!

We have been asked about submitting a survey for all three schemes.

We've taken an overarching approach that the survey focus is about Dashboards and not about scheme specifics.

We have contacted TPR to seek further clarity but as yet we have not had a response. If we receive further information we will share with all FRAs

Each FRA should have received their survey on Thursday 14 or Friday 15 November. If you have any questions please contact Matt Mott

### Connection to the Dashboard ecosystem

WYPF are also working on further information for FRAs to consider, such as matching criteria and registering for the Dashboard ecosystem.

It is our understanding FRAs as scheme manager will have to formally agree the matching criteria and nominate WYPF to deliver Dashboard requirements on their behalf.

We hope to provide this information next month and on receipt FRAs may wish to discuss it at their Pension Board meetings and consider adding Pension Dashboards to their risk register.

## 9. Five Year Audit Plan 2023 – 2027

West Yorkshire Pension Fund Five Year Audit Plan 2022 - 2027	Frq	Last Audit	Rcmnd	Days	23/24	24/25	25/26	26/27	27/28
Annual Accounts Verification	1	20/09/21	1	50	✓	✓	✓	✓	✓
<b>Audits Per Year</b>					<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>
Local Government Scheme Contributions	2	01/11/21	2	50					
New Pensions and Lump Sums - WYPF									
- Normal and Early Retirements	5	09/10/19	1	25	✓			✓	
- Death in Service, Post Retirement Widow and Dependent Benefits	5	08/10/21	0	25		✓			
- Ill Health Pensions	5	11/07/23	0	25				✓	
- Flexible Retirements	5	30/11/20	2	25	✓				
- Deferred Pensions	5	28/06/22	0	25			✓		
Transfers Out	5	07/10/20	0	20					✓
Transfers In	5	17/05/21	0	20			✓		
Reimbursement of Agency Payments	5	10/03/23	0	20		✓		✓	
Life Existence / Certificates	5	11/08/21	3	20					✓
AVC Arrangements	5	21/12/22	0	20			✓		
Admission of New Bodies	5	07/02/20	0	20					✓
Pensioners Payroll	2.5	17/11/20	0	50		✓			
Purchase of Additional Pension	5	29/03/22	0	20	✓		✓		
Annual Benefits Statements	2.5	30/09/22	0	40				✓	
Fire Service New Pensions and Lump Sums			1						
- Normal and Early Retirements	3	17/12/20	0	33.3		✓			✓
- Ill Health and Death Benefits	3	23/06/22	0	33.3			✓		✓
- Deferred Pensions	3		0	33.3	✓			✓	
<b>Audits Per Year</b>					<b>4</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>5</b>
UK and Overseas Equities	1	01/02/23	0	75	✓	✓	✓	✓	✓
UK Fixed and Index Linked Public and Corporate Bonds	3	18/08/22	0	25		✓			✓
UK and Overseas Unit Trusts (Property and Other)	3	06/02/23	1	25		✓			✓
Fund of Hedge Funds	5	09/06/16	1	15			✓		
UK and Overseas Private Equities	3	31/03/22	3	25		✓		✓	
Global Bonds	5	11/12/18	0	15	✓				
Treasury Management (Short Term Cash Lending)	1	18/12/22	0	75	✓	✓	✓	✓	✓



<b>West Yorkshire Pension Fund Five Year Audit Plan 2022 - 2027</b>	<b>Frq</b>	<b>Last Audit</b>	<b>Rcmnd</b>	<b>Days</b>	<b>23/24</b>	<b>24/25</b>	<b>25/26</b>	<b>26/27</b>	<b>27/28</b>
Stock Lending	5	24/11/21	1	15				✓	
Compliance with IAP Investment Decisions and Policies	5	22/02/21	0	15	✓		✓		
Verification of Assets	5	01/03/21	0	15			✓		
Verification of Assets	5	01/03/21		15	✓				
Listed Alternatives	5	00/01/00		15			✓		
<b>Audits Per Year</b>					<b>5</b>	<b>5</b>	<b>5</b>	<b>4</b>	<b>4</b>
<b>Additional work outside plan</b>									
Transfer of Data to New Pensions System		02/07/12	0						
Monthly Contribution Data Usage		20/08/15	6						
Information Governance Including GDPR		01/05/19	7						
Transfer of Data From Outside Bodies		10/06/19	6						
Pooling Arrangements		20/03/19	1						
Custodial Transfer Arrangements		01/07/20	0						
Accuracy of Contributions Recorded on Member Records		10/02/20	7						
GLIL		30/07/20	1						
Accuracy of Contributions Recorded on Member Records - Follow Up (i)		05/11/21	2						
NLGPS Collaborative Work - Common Custodian Arrangements		30/04/21	1						
Business Continuity		17/01/22	5						
Shared Service Admission		07/04/22	6						
NLGPS Collaborative Work - NPEP		29/06/22	3						
NLGPS Collaborative Work - GLIL Infrastructure		18/04/23			1				1
Exiting Employers		25/04/23			1				1
<b>No of audits</b>					<b>12</b>	<b>11</b>	<b>11</b>	<b>10</b>	<b>12</b>
<b>Audit days over five years</b>				<b>885</b>	<b>177</b>	<b>177</b>	<b>177</b>	<b>177</b>	<b>177</b>
<b>Resourced days</b>				<b>1,225</b>	<b>245</b>	<b>245</b>	<b>245</b>	<b>245</b>	<b>245</b>
<b>Headroom</b>				<b>340</b>	<b>68</b>	<b>68</b>	<b>68</b>	<b>68</b>	<b>68</b>

## 10. Overriding Disclosure Time Limits

Disclosure Requirement	Time Limit	Number of breaches in month
Material alterations to basic scheme information	Within 3 months of the change taking effect	0
Transfer Credits (quote)	Within 2 months	0
Annual Benefit Statements	By 31 August each year	Breach for in scope scheme members
Annual Benefit Statement (upon request)	Within 2 months of request, if not already provided within previous 12 months	0
Deferred Benefit Statements	By 31 August each year	Breach for in scope scheme members
Deferred Benefit Statement (upon request)	Within 2 months of request, if not already provided within previous 12 months	0
Pension Savings Statements	By 6 October each year	0
Cash Equivalent Transfer Value Out	Within 3 months of request	0
Accessing Benefits before Normal Pension Age	2 month of benefits becoming payable	0
Accessing Benefits on or after Normal Pension Age	1 month of benefits becoming payable	0
Notification of Deferred Benefit entitlement	2 months of being notified of leaver	0

## Divorce Time limits

Type of request	Time limit	Number of breaches in month
Request for divorce information only.	3 months from receipt of the request.	0
Request for divorce information where you are notified that the information is required in connection with divorce proceedings that have already commenced.	6 weeks from receipt of the request.	0
Request for divorce information where a Court Order imposes a deadline.	Within the deadline specified by the Court.	0
Request for divorce information where you are notified that a Pension Sharing Order may be issued.	Within 21 days of receiving notification that a Pension Sharing Order may be issued or a date outside 21 days as specified by the Court.	0
Where the request is for information which does not include a Cash Equivalent Transfer Value	1 month from receipt of the request.	0
Pension Sharing Order received but some information* and/or charges are still outstanding.	A letter to both parties needs to be sent out within 21 days of receiving the Order to explain the Order cannot be implemented and request the missing information and/or charges.	0
Pension Sharing Order received including all relevant information* and charges.	A letter** must be sent to both parties within 21 days of the start of the implementation period notifying them of the deadline.	0
Pension Sharing Order Received including all relevant information and charges.	4 months to implement the Order of the date of receipt of the final information which allows calculation	0
PSO has been implemented.	A letter* must be sent to both parties within 21 days of implementing the PSO to notify both parties their entitlement.	0

## 11. Calendar of Events

January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's Life Certificates Pensioner Newsletter
May	June	July	August
Life Certificates	Active Newsletter Life Certificates Issue Deferred Annual Benefits Statements	Life Certificates Issue Deferred Annual Benefits Statements Issue active Annual Benefits Statements	Issue active Annual Benefits Statements Life Certificates
September	October	November	December
Pension Estimates Assumption Exercise Life Certificates Pension Savings Statement	Life Certificates Participate in NFI tPR Scheme Returns	tPR Annual Survey Life Certificates	IAS19 Data capture exercise for Actuaries Life Certificates

## 12. Regulations/Fire Scheme Update

Please take a few minutes to read the Firefighters' Pension (England) Scheme Advisory Board Bulletin (Link to Bulletin below) and take any action required.

[FPS Bulletin](#)

Some key issues to highlight:

### FPS

#### Age Discrimination Remedy – Immediate Choice Remediable Service Statement (IC-RSS) rollout

In [FPS Bulletin 85 – September 2024](#) we informed readers of [HMRC's Public Service Pensions Remedy Newsletter](#), including [Appendix B](#) which set out the offsetting guidance for the unauthorised payment charge that is to be used for IC members who previously received an unauthorised payment.

We also provided details of a joint roundtable discussion with scheme managers and administrators, the slides of which are available on our Coffee Morning section of the [FPS regulations and guidance](#) website.

Further to this on 4 October 2024, we [emailed](#) scheme managers to provide a briefing paper requesting approval for administrators to commence processing red IC-RSS cases ahead of HMRC legislation coming into force.

At our administrators forum on 14 October 2024, we made administrators aware of the majority position of scheme managers, and we discussed the offsetting guidance and whether there were any gaps that had been identified.

We took away the comments and where appropriate we will come back with additional information/guidance. This should not however stop administrators from commencing processing red cases unless their clients have instructed otherwise.

**ACTIONS:** Scheme managers should ensure that they update their administrators should their position change. Administrators should ensure that they have read the offsetting guidance and unless otherwise instructed by their client, should commence processing red cases.

**WYPF – Please see admin update**

#### Age Discrimination Remedy – Immediate Choice Protected members

Following a recent query, we wanted to reiterate the legal requirement for sending a Remediable Service Statement to all eligible members under remedy. Whilst a member may be better off financially by being in the legacy scheme for the remedy period, there are other reasons why they may choose the reformed scheme instead, and it is their right to make that decision.

As a reminder in [FPS Bulletin 77 – January 2024](#) we published a [remediable service statement factsheet](#) and in [FPS bulletin 81 – May 2024](#) we published a [statutory deadline factsheet](#) to provide you with the relevant requirements that a scheme manager needs to adhere to when producing a remediable service statement

**ACTIONS:** Scheme managers should ensure that their administrators are producing a remediable service statement for all eligible members for remedy. Administrators should ensure that they are adhering to the legislative requirements for producing a remediable

service statement for all eligible members. Local Pension Boards are encouraged to monitor the production of remediable service statements as part of their regular updates

### **Firefighters Pension Scheme Valuation 2024 - GAD data request**

As set out on page 6 of the [FPS Bulletin 84 – August 2024](#), GAD is now:

- launching their spreadsheet tool to allow Fire and Rescue Authorities to validate their valuation data extracts prior to submission
- sharing details of how to submit your valuation data via a secure data transfer portal for each FRA or administrator.

GAD is collecting this data primarily for the purposes of the 31 March 2024 valuation. However, at the request of responsible government and devolved government departments GAD may also use the data provided for other purposes connected to the operation of the Scheme and the development of policy within government. GAD's privacy notice can be found [here](#). If you have any concerns about our use of the 2024 data, please get in touch with GAD: [Fire.2020Valuation@gad.gov.uk](mailto:Fire.2020Valuation@gad.gov.uk).

### **Process to follow**

1. **Action required:** Please identify the most appropriate contact(s) to receive the tool and upload your data once ready, and send the following information to [Fire.2020Valuation@gad.gov.uk](mailto:Fire.2020Valuation@gad.gov.uk):
  - The email address of the preferred contact
  - The FRA(s) on behalf of which they will be submitting data
2. GAD will then send this email address an invite to a secure folder through a system called Egress. Please make the preferred contact aware that this invitation can sometimes find its way into spam / junk folders.
3. Within the secure folder, users will find the Fire valuation data specification, the Fire valuation data checker tool and the accompanying data checker tool user guide. The valuation data tool can then be downloaded and populated.
4. Once the tool is populated and any flagged issues have been worked through, please upload the populated tool into the same Egress folder no later than 1 December 2024. The Egress system ensures secure data transfer – the folder will only be accessible to GAD and the email address(es) provided. GAD's data team will also ensure any personal data received is encrypted before use.
5. To help us form a more complete picture of each FRA fund's membership please also complete the short data questionnaire sections.

As a reminder, the 1 December deadline applies to "Data ..." tables covering the status of scheme members as at 31 March 2024. Tables covering changes in member status since the 2020 valuation extract ("movement data") are required to be provided by February 2025. Shortly after 31 March 2025 GAD will ask FRAs to provide their compiled data in respect of positive elections under the Matthews second options exercise. (The request to compile data on positive Matthews elections was first raised in FPS Bulletin 75, page 6.)

GAD will also be providing this information directly to FRAs and administrators via email.

**ACTION:** Administrators should follow GAD's process to follow to meet the 1 December 2024 deadline.

**WYPF:** We have been in discussion with GAD about receiving data pre rollback. GAD have agreed to this and have agreed to accept data ideally by 1 December but no later than 31 December.

## SAB

### Age Discrimination Remedy – request for data

The Scheme Advisory Board is keen to have oversight of the production of Remediable Service Statements (RSS), particularly in the run up to 31 March 2025.

We will now therefore be requesting monthly information relating to how many RSS' have been issued to members.

The scheme manager for each FRA will need to work with their administrator to collate this information.

Please therefore populate the [RSS spreadsheet](#) and return to [bluelightpensions@local.gov.uk](mailto:bluelightpensions@local.gov.uk) by 30 November 2024.

**ACTION:** WYPF are looking at developing internal reports to meet the request by SAB. We will confirm if this is possible in the next few weeks. In any event WYPF are not able to submit this data to SAB on behalf of FRAs.

## Other News and Updates

### Pensions Dashboards readiness survey

As part of TPR's dashboards communications approach, they will be sending all scheme managers two surveys at key points in their journey to their 'connect by' date, as set in DWP's guidance.

The surveys will be sent to Public Service Pension Schemes in the month following their second and third 'nudge' communications – and therefore all PSPS schemes can expect to receive the first survey in November. It is important that schemes complete and submit the surveys, which are anonymous, as they provide TPR with useful insights into industry readiness, and where any gaps in awareness and 22 Click here to return to Contents understanding may lie, in order to inform their approach.

**WYPF:** We understand these surveys are currently being received by FRAs. WYPF cannot submit responses on your behalf but we are producing a template of survey answers and will provide this to FRAs in the next week or two.

## Events

### Local Pension Board (LPB) Training Sessions

We are also pleased to release our 2025 dates as follows:

- Thursday 23 January 2025 10:00 – 14:00 (MS Teams) *(Fully booked)*
- Tuesday 25 March 2025 10:00 – 14:00 (MS Teams) *(Fully booked)*
- Monday 16 June 2025 13:00 – 17:00 (MS Teams) *(Fully booked)*
- Wednesday 17 September 2025 11:00 – 15:30 (in person – 18 Smith Square)
- Thursday 22 January 2026 10:00 – 14:00 (MS Teams)

Attendees will hear from a range of speakers including:

**LGA** – to provide an overview of the FPS scheme(s) and current pension related hot topics e.g. Matthews and McCloud

**SAB (England) Chair** – to give an introduction and overview of the work that SAB are involved in.

**Fire LPB Effectiveness Committee Chair** – to provide input on LPB effectiveness and what the committee have been working on.

**The Pensions Regulator** – to provide an update on the Administration and Governance survey and how the results relate to Fire, as well as covering the importance of the Public Sector Pensions toolkit and any current developments e.g. the General Code. The Pensions

**Dashboard Programme (PDP)/ The Pensions Regulator (TPR)** – to provide an update on the programme and requirements on scheme managers/to provide detail of the tools that scheme managers can use to help them prepare for dashboards e.g. checklists.

To book:

Please email [bluelightpensions@local.gov.uk](mailto:bluelightpensions@local.gov.uk) for the MS Teams sessions and we will announce when the booking link goes live for the in-person session at the LGA offices, 18 Smith Square, Westminster, SW1P 3HZ.

**ACTION:** Readers are asked to make their LPB members aware of the training sessions and encourage them to book onto a session.

### **FPS coffee mornings**

Our MS Teams coffee mornings are continuing in October 2024. 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.

On 26 November 2024 we will be joined by Home Office to discuss their workplan for the coming 12 months.

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

3 October 2024 – [Unauthorised payments process for offsetting](#)

22 October 2024 – [Matthews update](#)

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

### **Legislation**

#### **Statutory Instruments**

[Firefighters' Pension Schemes \(England\) \(Amendment\) Order 2023](#) [SI2023/986]

Directions Orders

[Public Service Pensions \(Valuations and Employer Cost Cap\) Directions 2023](#)



## 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](#)

## Pensions Dashboards

[TPR guidance and checklist](#)

[DWP guidance on connection](#)

[PASA connection readiness guidance](#)

I = Impact L = Likelihood

Reference	Risk Title	Cause and Effect	Priority (I x L)		Risk Control Residual	Action Required Target Risk	Closure note
7	Failure to deliver year end pension statements  Last Updated: 1 September 2024 Latest Review Date: 01/09/2024 Latest Review By:	Delays in the year end process put pressure on the processing RSS Remedy	I = 4, L - 4	16	Further delays will lead to fines, reductions in trust and confidence and potentially missing HMRC deadlines and the remedy deadline of 31/03/2025	Keep up to date with the existing timeline	Included within legal obligations
10	Failure to deliver Remedy Statements (Incl RSS's)  Last Updated: 1 Dec 2024	Delays in transfer of accurate information and data to WYPF  The ability of the system to deliver accurate statements	I = 4, L - 3	12	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  NCFRA is providing the data directly to WNH	Included within legal obligations
2	Failure to update scheme rules or comply with legislation  Risk Owner: Interim Chief Finance Officer  Latest Review Date: 1 December 2024  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  Enabling Service need to actively manage the Services (WNH & WYPF) to ensure that data is appropriately transferred in a timely manner	
4	Failure to inform members of pension changes  Risk Owner: Interim Chief Finance Officer Latest Review Date: 01 Dec 20243  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	Non adherence to tPR, HMRC, 3rd parties  Risk Owner: Strategic Finance Manager  Last Updated: 1 September 2024 Latest Review Date: 1 September 2024	Inadequate reporting to TPR, HMRC and third parties.	I = 3, L = 1	3	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 enrolment when joining due to underappreciation of pension benefits, resulting in increased employer costs and reduced employee benefits.  Risk Owner: Interim Chief Finance Officer  Latest Review Date: 1 Dec 2024	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 unavailable.	I = 2, L = 2	4	Consultation underway with scheme administrators around the future position of contributions.  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	Person Responsible: Lead HR Officer (Pensions)  Further comms to be issued following the next intake to ensure all staff and Fire Fighters are aware of the scheme benefits.	
8	Data Management  Last Updated: 1st December Latest Review Date: Latest Review By: 1 September 2024	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  Data sharing agreements with National Fire Services	Review and ensure audits are untaken and reviewed	
9	Matthews case  Last Updated: 1 December 2024 Latest Review Date: 1 September 2024 Latest Review By:	Failure to implement the agreed outcomes from the ruling	I = 3, L - 1	3	Continual discussions with WYPF and work with pensioners on the options  2nd/ 3rd option letters have been issued to the individuals in scope  Letters and calculations have begun	Lead Person: Joint Head of HR  Continual Management with the Joint Head of HR to deliver agreed outcomes	

HIGH RISK > 15

MEDIUM RISK > 10

LOW RISK <10

	The Firefighters' Pension Scheme 1992		Category	Also Occurs in
1.1	Permission for a Chief Fire Officer, appointed on or before 1.7.2013, to retire before attaining age 55	1.1	CFO Retirement	
1.2	Discretion to determine that certain payments, be treated as such for the credit of Additional Pension Benefit to the firefighter member	1.2	Pensionable Allowance	
1.3	Consent for one quarter pension to be commuted in the case of a firefighter who would otherwise not be permitted to commute such portion of pension	1.3	Commutation	
1.4	Discretion to commute, for a "trivial commutation lump sum", a small pension payable to a firefighter pensioner	1.4	Commutation	
1.5	A Scheme member may allocate a portion of pension for a dependant other than a spouse or civil partner	1.5	Allocating pension to none partner	
1.6	Requirement for, and acceptance of, an opinion as to normal life expectancy for allocation purposes	1.6	Allocating pension	2006 - 1.7
1.7	Pension debit members	1.7	Statutory Pension Sharing	2006 - 1.8
1.8	Discretion to increase level of spouse's or civil partner's award for such period as the Fire and Rescue Authority think fit where the firefighter and spouse or civil partner were living separately	1.8	Pension upon death	
1.9	Discretion to allow a gratuity to be paid to the surviving spouse or civil partner where it would otherwise not be payable	1.9	Pension upon death	
1.1	Discretion to reinstate all or part of a spouse's or civil partner's pension following termination of the pension on marriage, remarriage, formation of a civil partnership or subsequent civil partnership	1.1	Pension upon death	
1.11	Cessation of payment of a child's pension	1.11	Dependent Pension	
1.12	Determination of entitlement to a child's allowance for a child aged 18 or over who was dependent on the deceased by reason of permanent disablement	1.12	Dependent Pension	
1.13	Discretion to withhold all or part of a child's pension, permanently or temporarily, where the child is convicted of manslaughter of the deceased.	1.13	Dependent Pension	
1.14	Discretion to make an award of dependent relative's gratuity to a dependent relative who is not entitled to any other award under the Firemen's Pension Scheme Order	1.14	Dependent Pension	
1.15	Discretion to commute a spouse's or civil partner's pension, which is of limited amount, for a lump sum	1.15	Commutation	
1.16	Decision to commute a child's pension, which is of a limited amount, for a lump sum	1.16	Dependent Pension	
1.17	Decision to substitute a higher amount of child's flat rate award where neither of the child's parents is alive	1.17	Dependent Pension	
1.18	Discretion that the Fire and Rescue Authority should pay the employer's pension contributions due for a firefighters' period of absence without pay where the firefighter gives notice that he/she wishes to pay contributions	1.18	Additional Contributions for unpaid leave	
1.19	Extension of 6-month time limit for election to pay certain sums in order that earlier pensionable service may count on rejoining the fire and rescue service	1.19	Time limit extension	
1.2	Discretion to extend period in which a firefighter may make a payment to count as pensionable service a period during which an injury award was payable	1.2	Time limit extension	
1.21	Extension of 12-month time limit for acceptance of "mis-selling" transfer value payment	1.21	Time limit extension	
1.22	Discretion to adjust "mis-selling" transfer value to take account of any earlier service credit	1.22	Time limit extension	2006 - 1.39
1.23	Discretion to accept a transfer value.	1.23	Time limit extension	
1.24	Extension of 6 month time limit for a former firefighter who has opted out of the Firefighters' Pension Scheme 1992, to request payment of a transfer value to another pension scheme	1.24	Time limit extension	
1.25	Extension of 12-month time limit after leaving in which a former firefighter must be subject to a new scheme if a transfer value based upon a returned refund of pension contributions is to be permitted	1.25	Contribution Flexibility	
1.26	Discretion to deduct pension contributions from instalments of pensionable pay	1.26	Contribution Flexibility	
1.27	Discretion to extend 30-day time limit in which an election to pay contributions in respect of unpaid additional maternity, paternity or adoption leave must be made	1.27	Contribution Flexibility	
1.28	Discretion not to accept a firefighter's election to purchase increased benefits unless the firefighter has undergone a medical examination at his/her own expense and satisfied the Fire and Rescue Authority as to his/her good health	1.28	Time limit extension	
1.29	Discretion of Fire and Rescue Authority to agree to discontinuance of payment of periodical contributions for increased benefits where satisfied that payment is causing, or likely to cause, the firefighter financial hardship	1.29	Financial Hardship	

1.3	Discretion to extend the time limit for appeal against a Fire and Rescue Authority's decision based on a medical opinion	1.3	Time limit extension	
1.31	Requirement to deal with a person's disagreement by Internal Dispute Resolution Procedure arrangements	1.31	Dispute resolution	
1.32	Pension credit members	1.32	Statutory Pension Sharing	
1.33	Discretion to commute a small pension due to a pension credit member	1.33	Dependent Pension	
1.34	Requirement to decide whether a person under age 60 and in receipt of an ill-health pension for less than 10 years has become capable of carrying out any duty appropriate to the role from which he/she retired on health grounds	1.34	Ill Health	
1.35	Requirement to decide whether a person under age 60 who is receiving early payment of a deferred pension on health grounds, has become capable of firefighting and performing any other duties appropriate to his/her former role as a firefighter	1.35	Ill Health	
1.36	Discretion to reduce the level of an ill-health pension to not less than half of the full amount where firefighter contributed to infirmity by own default.	1.36	Ill Health	
1.37	Discretion to withdraw the whole or part of a person's pension during any period of his/her re-employment in any capacity with a Fire and Rescue Authority	1.37	Ill Health	
1.38	Discretion to withdraw a pension in whole or in part, permanently or temporarily, on a person's conviction of certain offences	1.38	Reputational	
1.39	Discretion to restore a pension withdrawn under Rule K5(1) to the pensioner or to apply it for the benefit of any dependant of the pensioner	1.39	Dependent Pension	
1.4	Determination of intervals at which instalments of pension or allowance shall be paid	1.4	Pension timings	
1.41	Discretion to delay payment of an award to the extent necessary for determining any question as to the Fire and Rescue Authority's liability	1.41	Determining Liability	
1.42	Discretion to decide an earlier payment date for survivors' benefits than the date prescribed	1.42	Dependent Pension	
1.43	Repayment of aggregate pension contributions	1.43	Time limit extension	
1.44	Payment of awards - minors	1.44	Dependent Pension	
1.45	Payment of awards - discretion as to recipient, or application, of payments due to a person incapable of managing his/her own affairs.	1.45	Dependent Pension	
1.46	Payment of awards - Discretion, following death of a person, as to recipient(s) of sums less than amount specified in the Administration of Estates (Small Payments) Act 1965	1.46	Dependent Pension	
1.47	Payment of awards - Discretion to withhold sums due in respect of fraud, theft or negligence on the part of that person in connection with his/her employment	1.47	Reputational	
1.48	Discretion to deduct from an award any outstanding balance of payments in respect of previous service	1.48	Determining Liability	
1.49	Discretion to extend 28-day time limit in which a person must lodge any medical appeal, provided the Fire and Rescue Authority are of the opinion that the person's failure to lodge the appeal within 28 days was not due to his/her own default	1.49	Time limit extension	
1.5	Discretion to decide the Fire and Rescue Authority's representation at a Medical Appeal Board interview.	1.5	Statutory	
1.51	Discretion to decide whether or not to submit written evidence or a written statement to a Medical Appeal Board	1.51	Statutory	
1.52	Discretion, where Medical Appeal Board decides an appeal in favour of the Fire and Rescue Authority and reports that in its opinion the appeal was frivolous, vexatious or manifestly ill-founded	1.52	Statutory	
1.53	Discretion to require the appellant to pay the Authority a sum not exceeding the total amount of fees and allowances payable to the Board, where the appellant withdraws an appeal	1.53	Statutory	

	The Firefighters' Pension Scheme 2006		Category	Also Occurs in
1.1	Discretion to accept the status of "nominated partner" where the Scheme member and partner had been in a relationship for less than 2 years	1.1	Equality	
1.2	Pension on member-initiated early retirement	1.2	Early retirement	
1.3	Authority-initiated early retirement	1.3	Early retirement	
1.4	Discretion to determine that certain payments should be treated as such for the credit of Additional Pension Benefit to the firefighter member	1.4	Pensionable Allowance	
1.5	Discretion to commute a small pension to a trivial commutation lump sum	1.5	Commutation	
1.6	Discretion to permit a firefighter to allocate a portion of pension for a dependant other than a spouse, civil partner, or nominated partner	1.6	Dependent Pension	
1.7	Requirement for, and acceptance of, an opinion as to normal life expectancy for allocation purposes	1.7	Allocating pension	1992 - 1.6
1.8	Pension debit members	1.8	Statutory Pension Sharing	1992 - 1.7
1.9	Discretion to withhold all or part of a survivor's pension, where the deceased's spouse, civil partner, or nominated partner is convicted of manslaughter of the deceased	1.9	Dependent Pension	
1.1	Discretion, subject to request of surviving spouse, civil partner or nominated partner of a firefighter member, to commute their pension to a trivial commutation lump sum	1.1	Dependent Pension	
1.11	Discretion to withhold all or part of a child's pension, permanently or temporarily, where the child is convicted of manslaughter of the deceased	1.11	Dependent Pension	
1.12	Discretion, subject to consent of child's remaining parent, guardian or the child (if not a minor) to commute a child's pension to a trivial commutation lump sum	1.12	Dependent Pension	
1.13	Discretion as to recipient of death grant and post-retirement death grant	1.13	Commutation	
1.14	Discretion to pay part of any death grant to a person whose conviction for murder or manslaughter of the deceased has been quashed	1.14	Reputational	
1.15	Discretion, with the agreement of the pension credit member, to commute the whole of a pension credit pension to a trivial commutation lump sum	1.15	Commutation	
1.16	Discretion to pay a post-retirement death grant in respect of a pension credit member to such person or persons as the Fire and Rescue Authority think fit.	1.16	Time limit extension	
1.17	Discretion to extend time limit for an appeal against the Fire and Rescue Authority's decision based on medical advice	1.17	Time limit extension	
1.18	Requirement to deal with a person's disagreement by Internal Dispute Resolution Procedure	1.18	Dispute resolution	
1.19	Requirement to decide whether a person under State pensionable age and in receipt of an ill-health pension for less than 10 years has become capable of carrying out any duty appropriate to the role from which he/she retired on health grounds	1.19	Ill Health	
1.2	Requirement to decide whether a person under normal benefit age (65) who is in receipt of a deferred pension paid early on permanent disablement, has become capable of carrying out any duty appropriate to their former role	1.2	Ill Health	
1.21	Discretion to withdraw the whole or part of a Part 3 (personal awards) pension for any period during which the person entitled to it is again employed as a firefighter, or in any other capacity, by any Fire and Rescue Authority	1.21	Ill Health	
1.22	Discretion to disallow early payment of a deferred pension under Part 3, Rule 3, paragraph 4 because of firefighter's dismissal from a Fire and Rescue Authority's employment	1.22	Reputational	
1.23	Discretion to withdraw pension in whole or in part, permanently or temporarily, on a person's conviction of certain offences	1.23	Reputational	
1.24	Discretion, to restore a pension withdrawn under Part 9, Rule 5, paragraphs 1 to 3, or to apply it for the benefit of any dependant of the pensioner	1.24	Reputational	
1.25	Discretion to decide to what extent an award should be forfeited by a person who has been convicted of an offence under section 34(6) of the Fire and Rescue Services Act 2004	1.25	Reputational	
1.26	Discretion for a Fire and Rescue Authority to pay the employer's pension contributions due for a firefighter's unpaid period of absence where the firefighter gives notice that he/she wishes to pay contributions	1.26	Time limit extension	
1.27	Discretion to deduct pension contributions from each instalment of pensionable pay as it becomes due	1.27	Contribution Flexibility	
1.28	Discretion to extend the time limit in which an election to pay pension contributions in respect of unpaid additional maternity, paternity or adoption leave must be made	1.28	Time limit extension	
1.29	Discretion to deduct contributions in respect of unpaid additional maternity, paternity or adoption leave from the death grant payable under Part 5 if a member or connected member dies	1.29	Contribution Flexibility	

1.3	Discretion to allow a part-time regular firefighter to pay contributions at a part-time rate to purchase additional service	1.3	Contribution Flexibility	
1.31	Discretion to allow a retained or volunteer firefighter to purchase additional service by periodical contributions	1.31	Contribution Flexibility	
1.32	Purchase of service during the limited period	1.32	Time limit extension	
1.33	Discretion to agree to a firefighter member's request to discontinue payment of additional contributions to purchase service provided this is solely on the grounds of the member's financial circumstances	1.33	Contribution Flexibility	
1.34	The payment of contributions in respect of periods of unpaid service or absence, and discretion to extend the time limit in which the firefighter must pay	1.34	Contribution Flexibility	
1.35	Discretion to charge member for third or subsequent statement of cash equivalent transfer value entitlement requested within any 12 month period	1.35	Pension Charges	
1.36	Discretion to extend time limit in which a member, other than a special firefighter member, may apply for a transfer value payment from a non-occupational pension scheme	1.36	Time limit extension	
1.37	Discretion to accept a transfer value	1.37	Time limit extension	
1.38	Discretion to extend 12-month time limit for acceptance of a "mis-selling" transfer value payment	1.38	Time limit extension	
1.39	Discretion to adjust "mis-selling" transfer value to take account of any earlier service credit	1.39	Time limit extension	1992 - 1.22
1.4	Discretion to delay payment of an award to the extent necessary for determining any question as to a Fire and Rescue Authority's liability	1.4	Time limit extension	
1.41	Discretion to pay an award at other reasonable intervals if impracticable to pay at the standard monthly periods	1.41	Payment under ill health	
1.42	Discretion to recover all or part of an overpayment following a pensioner's death of which a Fire and Rescue Authority were not informed	1.42	Reputational	
1.43	Repayment of aggregate contributions	1.43	Contribution Flexibility	
1.44	Discretion as to recipient of any sum payable to a minor and directions as to application for the minor's benefit	1.44	Dependent Pension	
1.45	Discretion as to recipient, or application, of payments due to a person incapable of managing his/her own affairs	1.45	Payment under ill health	
1.46	Discretion, following the death of a person, as to recipient(s) of sums less than the amount specified in the Administration of Estates (Small Payments) Act 1965	1.46	Time limit extension	
1.47	Discretion to withhold sums due in respect of an award to a firefighter where there has been a loss to the funds of the Fire and Rescue Authority as a result of fraud, theft or negligence	1.47	Reputational	
1.48	Discretion to require a person who is or may be entitled to a pension or a lump sum under the Firefighters' Pension Scheme 2006 to provide a Fire and Rescue Authority with supporting evidence as to identity	1.48	Ill Health	
1.49	Decision as to date of issue of annual benefit statements and relevant date for the pension illustration	1.49	Reputational	
1.5	Discretion to extend 28 day time limit, in which a person must lodge a medical appeal, to a period not exceeding 6 months	1.5	Time limit extension	
1.51	Discretion to decide the Fire and Rescue Authority's representative at Medical Appeal Board interview	1.51	Ill Health	
1.52	Discretion to decide whether or not to submit written evidence or a written statement to Medical Appeal Board	1.52	Ill Health	
1.53	Discretion, where Medical Appeal Board determines an appeal in favour of the Fire and Rescue Authority and states that the appellant's appeal was "frivolous, vexatious or manifestly ill-founded"	1.53	Ill Health	
1.54	Discretion to require the appellant to pay to the Fire and Rescue Authority such sum as the Authority think fit, where the appellant gives notice to the Medical Appeal Board, withdrawing the appeal	1.54	Ill Health	

	The Firefighters' Pension Scheme 2015		Category	Also Occurs in
1.1	Delegation.	1.1	Reputational	
1.2	Opting into the Scheme. Discretion to determine date at which pensionable service starts.	1.2	Policy decision	
1.3	Opting out of the Scheme. Discretion to determine date at which pensionable service ceases.	1.3	Policy decision	
1.4	Discretion to allow Continual Professional Development payments to be treated as pensionable.	1.4	Allowance	Pensionable Allowance
1.5	Active membership - unpaid authorised absence.	1.5	Policy decision	
1.6	General. Discretion to keep in such form as the scheme manager considers appropriate.	1.6	Policy decision	
1.7	Closure and re-establishment of active member's account. Scheme Manager's discretion to select appropriate account where more than one account held.	1.7	Policy decision	
1.8	Closure of deferred member's account after gap in pensionable service not exceeding 5 years. Discretion to select which account is to be closed where more than one account is held.	1.8	Policy decision	
1.9	Employer initiated retirement. Discretion to award immediate payment of retirement pension without reduction	1.9	Early retirement	
1.1	Exercise of partial retirement option. Discretion as to form in which notice must be given	1.1	Policy decision	
1.11	Review of ill-health award or early payment of retirement pension on ill-health grounds. Discretion to select appropriate timing of review	1.11	Ill Health	
1.12	Consequences of review	1.12	Ill Health	
1.13	Commencement of pensions. Discretion to determine date of commencement of payments	1.13	Policy decision	
1.14	Allocation election. Discretion to withhold consent if Scheme Manager is not satisfied that nominated person is substantially dependent on the member	1.14	Policy decision	
1.15	Making an allocation election. Proof of the member's normal life expectancy	1.15	Policy decision	
1.16	Adjustment of allocated benefit. Discretion to adjust allocated benefit if member dies after reaching age 75	1.16	Policy decision	
1.17	Discretion to waive qualifying period for surviving partner's pension in the case of a co-habiting partner	1.17	Equality	
1.18	Meaning of "eligible child". Discretion as to timing of review if eligibility is based on permanent disablement	1.18	Dependent Pension	
1.19	Person to whom lump sum death benefit payable. Discretion of Scheme manager to select recipients	1.19	Dependent Pension	
1.2	Payment of pension in respect of an eligible child below age 18. Discretion relating to payment of child's pension	1.2	Dependent Pension	
1.21	Surviving partner's pensions and eligible child's pensions. Discretion to suspend and recover	1.21	Dependent Pension	
1.22	Discretion for later adjustments	1.22	Dependent Pension	
1.23	Discretion to adjust benefits to comply with Finance Act 2004 where members die over age 75	1.23	Contribution Flexibility	
1.24	Member contributions. Discretion to specify circumstances where a reduction in pensionable pay shall be disregarded for purposes of determining member contributions	1.24	Contribution Flexibility	
1.25	Discretion to require member to pay the employer's contribution in addition to the employee's contribution	1.25	Contribution Flexibility	
1.26	Deduction and payment of contributions. Discretion to agree with member the method of payment of employee contributions	1.26	Contribution Flexibility	
1.27	Statement of transfer value entitlement. Discretion to extend period in which guarantee date falls	1.27	Time Extension	
1.28	Request for acceptance of a transfer payment. Discretion to extend time limit for request	1.28	Time Extension	
1.29	Transfer statement and club transfer value statement. Discretion to require member to request manager of other pension scheme to provide statement of transfer value	1.29	Policy decision	

1.3	Role of IQMP in determinations by the scheme manager	1.3	Policy decision	
1.31	Review of medical opinion	1.31	Ill Health	
1.32	Notice of appeal (Board of Medical Referees)	1.32	Ill Health	
1.33	Reference of appeal to the Board	1.33	Ill Health	
1.34	Procedure where appeal to be pursued. Discretion to submit written evidence. Selection of attendee(s) representing the scheme manager at the interview	1.34	Ill Health	
1.35	expenses of each party. Discretion to require appellant to pay fees and allowances in certain circumstances	1.35	Policy decision	
1.36	requirement to deal with a person's disagreement by Internal Dispute Resolution Procedures ("IDRP"). Discretion to decide local IDRP arrangements	1.36	Dispute resolution	
1.37	Recovery of overpayment of benefits. Discretion to decide means of recovery of overpayment resulting from a percentage decrease in earnings in a revaluation order	1.37	Over Payment	
1.38	Commutation of small pensions. Discretion to commute	1.38	Commutation	
1.39	Discretion regarding payments for persons incapable of managing their affairs	1.39	Payment under ill health	
1.4	Payment of awards - discretion, following the death of a person, as to recipient(s) of sums less than the amount specified in the Administration of Estates (Small Payments) Act 1965	1.4	Reputational	
1.41	offences committed by members, surviving partners or eligible children	1.41	Reputational	
1.42	Forfeiture of pension in the event of murder and discretion as to forfeiture in the case of manslaughter	1.42	Reputational	
1.43	Forfeiture of lump sum death benefit	1.43	Reputational	
1.44	Discretion to withhold benefits in respect of relevant monetary obligations and relevant monetary losses	1.44	Reputational	
1.45	Discretion to set-off a relevant monetary obligation against a member's entitlement to benefits under the scheme	1.45	Over Payment	
1.46	Discretion to request evidence of entitlement	1.46	Policy decision	
1.47	Part 2, Paragraphs 6 to 11. Periodical payments for added pension. Discretion to set a minimum amount, to agree method of payment, and to extend time limit for payment	1.47	Time Extension	
1.48	Part 1, Paragraph 3(3). Discretion to determine tapered protection date in some cases	1.48	Policy decision - Sergeant Case	



# Pension Data Improvement Plan

Author: Nick Alexander

Decision required:

Date: December 2024

Version: 1

Security Classification



## Purpose of report

To inform the board of the details of the improvement plan for NCFRA.

## Scheme data

As a pension trustee or someone who runs a public service scheme we should ensure that our administrators (defined as WYPF) have effective processes for maintaining data. we should also continually improve the data our scheme holds.

This involves reviewing data, deciding how you're going to improve it and agreeing improvement plans.

Work with the scheme administrators and the employer to improve our processes, using them to fix any errors that we find.

## Data improvement plans

All pension schemes collect and hold large amounts of data which changes on a regular basis. It is therefore likely that there will be issues with missing or inaccurate data from time to time.

We are required to report the data quality at least once a year (as part of the pension regulator return).

If we find any issues we should put an improvement plan in place to address them. our administrator should be able to help we design an improvement plan, or assess the one we currently have in place.

We will then set out any the steps you're taking to improve our scheme data.

This is likely to include

- NI data for dependent pensions
- Data that has not been updated in over a number of years
- Data that doesn't align to 'standard' principles, ie an overseas address not matching the standard principles

## Objectives

- Addressing data issues which impair our ability to run our scheme effectively: paying benefits correctly, processing core transactions, ensuring a high standard of service for members, keeping costs manageable or meeting legal obligations (may be identified using our annual data review, an audit or the valuation process)
- Improving members' experiences, such as providing them with online access to their records
- Improving employer confidence in the assessment of liabilities and the appropriateness of their contributions and recovery plans
- Improving data ahead of a risk-reduction or a liability-management exercise
- Improving the transfer of data between the payroll team and WYPF

## The administrator's role in the management of data

### During this process we will seek to

- To help to identify the issue that need to be addressed
- The method to be used for identifying this, for example member address tracing or researching company employment records
- Who is doing the work and how long it will take
- Any assumptions made, for example the number of records likely to need work, which members are covered and how errors will be fixed  
how we will know the task has been achieved

## The employers (when not acting as the administrator) role in the management of data

### During this process we will seek to

- To provide timely and complete data to the administrator
- To review and compare local data to that held by the administrator
- To regularly survey their employees around the quality of information we hold for them and to correct errors that are found

## Lessons learnt

- We will learn the lessons of the past, it is not acceptable to understand the risks and issues that have occurred and to not seek to address those as part of a data improvement plan; &
- To engage with stakeholders to consider end user experiences.
- To use the experience of the pension administrator and best practise across the sector

## Dependencies with other work

We will clearly identify any other work which might influence our improvement work.

- Member communication exercises
- Guaranteed minimum pension reconciliation and equalisation
- Year-end reconciliation
- Negotiating an administration contract
- Proposed scheme structure changes
- Sergeant and Matthews remedy cases

## Timeline for the plan

The plan must have a defined start and end date. Given how complex this is and the amount of work this will take, this is planned to commence from in 202/25 and finalising before the commencement of the Sergeant ruling to ensure that data is considered before this major exercise.

## Resources

We will require staff to complete this between both the administrators and therefore we will need to ensure that the timeframe is reasonable with both. We will also require;

- Employers - providing member information, employment and contribution history
- HMRC - National Insurance numbers
- Members - dates of birth, email addresses
- Tracing companies - address checks, existence checks
- Advisers, such as actuaries or lawyers

## Outcomes

Outcomes are expected to include:

- Improved member service, for example fewer member complaints and reduced processing times for events such as transfers
- Improved administrator data
- Updated and documented procedures which reduce the risks of errors recurring
- Improved data scores, which we should retest once you've cleaned the data to show progress

## Roles and responsibilities

The board will need to have oversight of progress and the output of the work delivered.

Understanding that it is not be possible to have 'perfect' data, and items such as common data may not be available and scores such as this will never be 100%.

We need to have an agreement on how the outcomes will be reported to the board on both

- Progress and
- Outcomes.

## Deliver a data improvement plan

Factors we should consider include:

Data type	Personal information, which will improve our ability to communicate with members Specific data item which is a frequent cause of complaints
Member type or profile	Pensions in payment first How close members are to retirement
Data source	Largest employer first (in a multi-employer scheme)
Scheme event	The data we need for certain scheme events such as issuing benefit statements or valuations
Return on investment	Issues which have the greatest impact on running costs
Technical solution	Bulk automated resolution
Quick wins	Known data issues which are relatively easy to fix

## Ongoing data improvement

Improving data should be a continuous process, not a one-off exercise, therefore we will plan annual reviews of all of the data sources.

## Review administrator performance

We need to ensure a robust contract with the administrator. We will review our administrator's performance against the contract on a regular basis.



**NORTHAMPTONSHIRE  
FIRE & RESCUE SERVICE**





## AGENDA ITEM: 9

<b>REPORT BY</b>	<b>Project Support Officer</b>
<b>SUBJECT</b>	<b>Northamptonshire Firefighters' Pension Scheme Local Pension Board - Agenda Plan</b>
<b>RECOMMENDATION</b>	To discuss the agenda plan

1.1The agenda plan incorporates statutory, good practice and agreed scrutiny items and has been updated to reflect the items at the March 2024 – July 2025

[illegible]

Minutes	every meeting	Minutes	Minutes	Minutes	Minutes	Minutes	Minutes
WYPF Monthly report (latest is presented and will cover: - admin update - LGA points of interest	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
Update and any breaches	Every meeting			Update and any breaches	Update and any breaches	Update and any breaches	Update and any breaches
IDPRS	Every meeting			IDPRS	IDPRS	IDPRS	IDPRS
Compliance with the Pensions regulator and Code of Practice	annually			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
Annual Report	annually			Annual Report			
Annual Benefits Statement	Annually			Annual Benefits Statement			
Immediate Detriment position	Annually				Immediate Detriment position		
Age Discrimination remedy	annually				Age Discrimination remedy		
Election of Chair and Vice chair	Annually (1st meeting within FY)		Election of Chair and Vice chair				Election of Chair and Vice chair
Knowledge Management and Representative self-assessment					Knowledge Management and Representative self-assessment		



Communication update (to list communications being sent)	Every meeting	Communication plan.	Communication plan.	Communication plan.	Communication plan.	Communication plan.	Communication plan.
Board Training	Every meeting	Board Training	Board Training	Board Training	Board Training	Board Training	Board Training
Data improvement plan	Annually?			Data improvement plan			
Proposed discretions					Proposed discretions		
Firefighters pension scheme administration – annual update	annually					Firefighters pension scheme administration – annual update	