



NORTHAMPTONSHIRE FIRE AND RESCUE AUTHORITY

PENSION BOARD MEETING

21st July 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

* * * * *

Public Meeting of the Fire Pension Board				Time
1	Welcome and Apologies for non- attendance			10:30
2	Declarations of Interests			10:35
3	Meetings and Action log 21 st April 2022	SH/KO	Report	10:40
4	Fire fighters pension scheme administration update	NA/ WYPF	Verbal	10:50
5	Update and Breaches of Law	WYPF	Verbal/ report	11:00
6	LGA Bulletin – points of interest https://fpsregs.org/index.php/bulletins-and-circulars/bulletins	HS	Report	11:10
7	Risk Register	NA	Report	11:25
8	Immediate Detriment Position	HS/NA	Report	11:40
9	Firefighters pension scheme administration – annual update	HS	verbal	12:00
10	Agenda Plan	HK / KO	Report	12:20
11	AOB	Chair		
12	Confidential items – any	Chair		
	Resolution to exclude the public	Chair		
	Future Meetings: <ul style="list-style-type: none"> - 21st July 2022 - 29th September 2022 - 8th December 2022 			12.25

Agenda Item : 3

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

Attendees: Shaun Hallam (SH); Nick Alexander (NA); Kate Osborne (KO); Helen King (HK); Jim Dorrill (JD); Helen Scargill (HS); Sukhjot Kaur (SK); Matt Mott (MM)

	Issue	Responsible	Comments
1	Welcome and Apologies for non- attendance		<ul style="list-style-type: none"> • Welcome <ul style="list-style-type: none"> ○ Apologies –Darren Dovey, Kevin Aitken (retiring), Yunus Gajra, Aidan Phillips (AP) • Thanks were given to Kev Aitken for his time and input on the NFRS Pension Board and at meetings who has now retired.
2	Declarations of Interests		
3	Meetings and Action log 30 th September 2021		<ul style="list-style-type: none"> - ACTION: SH to book some training around pensions – possibly link with LGA - ACTION: HK – to look at additional training re: regulations - ACTION: KO to send JD ToR for review and input - ACTION: NA to look into who's responsibility TPR is
4	Fire fighters pension scheme administration update	NA/ Yunus Gajra	-
5	Update and Breaches of Law	YG WYPF	<ul style="list-style-type: none"> - Report submitted for March meeting - Client reports sent – don't propose to go through separately. Raise any questions with HS - HS chair of fire technical community - Hs will update on affected individuals regarding members who have been moved onto 15 scheme. Communications scheme pending HS - 2023 highly likely to be same - Benefit statementing issues with correct data. - NA – police side now a calculator – fire services requested similar? Scheme advisory board – fire are not going down calculator route. - JD – what's the plan to get the timeline out to staff? – difference between comms message and action. – automated element and dealing with individual cases and commitment to do this. HS – suggested this might be a useful comms to have on the agenda that highlights issues with annual benefits statements issued without remedy to manage members expectations?

			<ul style="list-style-type: none"> - HK – lots of factors to take into account – DD looking at communications needing to go out. Important all the key parties stay linked in and discuss latest information. So at the appropriate time the Commissioner can make any decisions. - Action: HK & NA & SH– agree to schedule regular diary appointments to discuss this so all statutory officers are informed to make decisions at key times. - Confirmed that audit report will be sent with the minutes of the meeting, but report is confidential and cannot be shared in its entirety. Recommendation at next board – pulling out recommendations for discussions but cant make whole report available to pension board. – Action - NA to take lead and feedback to board on this. - HS – has shared link to webinars – on the WYPF report in bundle - NO breaches reported
6	LGA Bulletin – points of interest https://fpsregs.org/index.php/bulletins-and-circulars/bulletins	HS	<ul style="list-style-type: none"> - See report
7	Risk Register	NA	<ul style="list-style-type: none"> - Keep similar to national risk register - Have specifically mentioned two items - Data quality – HS has covered some aspects. This is across multiple systems feeding in, and need to be content all data is feeding through. Payroll isn't feeding information as quickly or accurately as it could – one area needs focus – recruitment will help / assist with the improvement of data flow. - MM – looking at KPIs – about 15 failed over period – 7 are down to data issues. – delays in data or details of process. - SH – potentially not quality issue, more of a processing/ receiving issue - we do have disparate systems at the moment – information on multiple systems – future plans – audit to ensure we are putting valid information on new/ future systems. Check with members the information is right- quality checks to gain additional assurance. - Action: NA to bring 'data transition' paper when we move to new system. - Migration of data – death benefits – now improved as a result of members checking their own information - Any missing information - Opting out – everyone in scheme has received a letter – more letters moving through the remedy period, plus structured intakes of new recruits. - Is anyone hearing of individuals bringing self out of pension – is this a risk we need to monitor – SH – YES we should monitor as they have heard of some instances. - A lot of panic is regarding information about deferred benefits.

			<ul style="list-style-type: none"> - HS – structured recruitment – offer a training slide/ presentation to let people know about the pension scheme. This is available to new recruits – NA and ACTION - SH – keen to follow up as part of their induction (18 new recruits) - HS – pre-retirement seminars – do you want WYPF to support – ACTION - SH to feedback to look into this - SH – training about joining 2015 scheme?? – HS this is only being done for new starters currently.
8	Election of chair and vice chair	Chair	<ul style="list-style-type: none"> - NA – very difficult to get people to chair and deputy chair. - NA – need to look at the future of the board to ensure the chair is knowledgeable on the topic and issues. – succession planning requirement. - HK – echo future proofing and succession planning required. - SH – SH to remain chair – Action: look at new recruits for board and succession planning outside meeting.
9	Policy review and Training audit	KO	<ul style="list-style-type: none"> - LGA training then look at developing into more specialist training with HS supporting. - NA – more people involved in training to ensure there is coverage in the future. - Fire executive group training – - HS – another pension board has document/ self assessment – Action: HS ask if she has permission to share with Northants.
10	Local Pension Board Representative Training	NA/ SH/ KO	-
11	Update on communication plan?	NA	<ul style="list-style-type: none"> - Put in a forward plan for the next couple of years. - HS might be useful to then do something to add in what has been sent out – to keep a record of ALL communications which has been sent out.
12	Agenda Plan	HK / KO	<ul style="list-style-type: none"> - Data improvement plan – KO add as item on July AGENDA!!!! - NA – decisions for abatements and changes to pension arrangements. - Data breaches to remain as a constant agenda item. - Abatements – Action: HK to explore with SH the best way for the PFCC as employer to be sighted on abatements and to be assured that any business cases approved include all relevant operational, financial, HR and equality considerations. - HS – separate out abatement and re-employment – then under firefighter regulations that re-employment is covered by abatement in fire regulations. Need to have a process that checks for exceptional circumstances. Action: SH, NA and HS to discuss externally
13	AOB	Chair	-
14	Confidential items – any	Chair	

	Resolution to exclude the public	Chair	
	Future meetings <ul style="list-style-type: none">- 21st July 2022- 29th September 2022- 8th December 2022		

Monthly Report

April 2022

Northamptonshire Fire Authority



Prepared by:

Yunus Gajra

Business Development Manager

Tel: 01274 432343

Mobile: 07582105760

Email: Yunus.gajra@wypf.org.uk

West Yorkshire Pension Fund

Aldermanbury House

4 Godwin Street

Bradford

BD1 2ST

www.wypf.org.uk

Follow WYPF on Twitter www.twitter.com/wypf_lgps

Follow WYPF on Facebook www.facebook.com/westyorkshirepensionfund



European Pensions

AWARDS 2019



WINNER

Pensions Administration Award (Pension Fund)

Contents

1 Regulations/Fire Scheme Update.....	4
2 Member Issues	9
3 Administration Issues.....	10
4 Key performance Indicators	12
5 Work in progress.....	13
6 Member web registrations.....	14
7 Calendar of Events	15
8 Membership Numbers	16
9 Five Year Audit Plan	20
10 Overriding Disclosure Time Limits.....	21

1. 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 55](#)

FPS

Home Office consultation response and amending legislation

On 8 March 2022, the Home Office published its [consultation response on prospective remedy](#), along with [a frequently asked questions document](#).

The consultation response confirms the amendments to the pension scheme regulations which will deliver the first set of changes and remove the transitional protections from the FPS 2015. In addition, it confirms provisions for an ill health underpin which will ensure that a protected member who applies for ill health retirement before 31 March 2022, and which is determined in their favour after that date, is treated no less favourably than if the application had been determined on that date.

The Home Office has identified one scenario where a member who transitions on 1 April 2022 with an ill-health decision pending could be placed in a worse position. This would be where a legacy FPS 1992 member moves across to the FPS 2015 and does not meet the qualifying criteria for ill-health retirement in the FPS 2015 but would have met the corresponding criteria under the legacy FPS 1992.

To avoid any such members being in a worse position than if the decision had concluded prior to 1 April 2022, changes have been made to the FPS 2015 regulations which mean that the member is assessed for ill-health retirement against a Normal Pension Age (NPA) of 55.

The response also makes provisions to allow arrangements for members who are purchasing service in the legacy schemes by way of periodical contributions, entered before 1 April 2022, to continue on after that date.

These changes enact the policy announced in February 2021 and are consequential to the provisions in the Public Service Pensions and Judicial Offices Act 2022 (PSPJOA 2022) which received Royal Assent on 10 March.

[The Police and Firefighters' Pension Schemes \(Amendment\) Regulations 2022](#) were laid in parliament on 21 March. The amendments come into force on 1 April 2022 and enable the prospective elements of the 2015 Remedy as set out in the consultation.

A further Home Office consultation will take place later in the year on the retrospective amendments that are required to fully deliver the remedy. This includes establishing the deferred choice underpin (DCU) and the changes needed to offer

pensioners and beneficiaries of deceased scheme members an immediate choice between legacy or reformed scheme benefits

Matthews – Second options exercise

Readers may be aware of the category of members of the Firefighters' Pension Scheme 2006 (FPS 2006) known as "special members" who were introduced in 2014, following [Matthews v Kent and Medway Towns Fire Authority & others](#), which allowed retained firefighters employed between 1 July 2000 and 5 April 2006 to join the FPS 2006 with retrospective effect to 1 July 2000.

A time-limited options exercise took place between 2014 and 2015 to allow eligible individuals to join the FPS. While the benefits awarded to special members largely mirrored the benefits under the FPS 1992, the FPS 2006 was amended as the FPS 1992 was closed.

More recently, work has again had to take place on the pensions aspect of "Matthews", following the European Court of Justice's decision in [O'Brien v Ministry of Justice](#) concerning fee paid judges in the Judicial Pension Scheme. The judgment held that remedy could extend back before the Part-time Workers Directive was required to be implemented on 7 April 2000.

On 9 March 2022, after an extended period of negotiations, a [Memorandum of Understanding \(MoU\)](#) was agreed between the government, the Fire Brigades Union, the Fire & Rescue Services Association, and FRA employers.

It was confirmed that remedy for retained firefighters affected by the O'Brien judgment will be provided by way of a second options exercise allowing in-scope individuals the opportunity to purchase pension entitlement as a special member of the FPS 2006. More details on the scope and mechanics of the settlement are available in our [summary of "Matthews" MoU and second options exercise factsheet](#).

The regulations to implement the second options exercise in England will be drafted by the Home Office and consulted on before they are laid before Parliament. The Home Office has a maximum period of 18 months to draft, consult, and introduce the necessary secondary legislation.

FRA will be expected to start the second options exercise as soon as possible after the legislation comes into force. The exercise will run for a maximum period of 18 months.

Prior to the legislation coming into force, FRAs are advised to take steps to identify retained firefighters who were employed between the relevant dates and ascertain what steps were taken to identify and contact individuals who were eligible for the first options exercise. This will help FRAs determine whether the retained firefighter is in scope again this time around.

We have also asked FRAs to identify any retained firefighters who have transferred from retained to whole time employment and maybe subject to aggregation. For clarity, the individual must have been in retained employment at some point between

7 April 2000 and 5 April 2006 and they must have joined whole time employment without a break in, or overlap of, service. Once these individuals have been identified, and **no later than 31 May 2022**, FRAs should email Bluelightpensions@local.gov.uk with the total number of members, split by scheme that the firefighter joined in respect of their whole time employment, for example, FPS 1992 = 3, FPS 2006 = 5.

Member communications post 1 April 2022

On 8 March 2022, the [FPS Coffee Morning was dedicated to the preparation for prospective remedy](#). Attendees were reminded that all current members of the Firefighters' Pension Schemes who remain active employees beyond 31 March 2022 do so as a member of FPS 2015. Full details on what action must be taken can also be found in [FPS Bulletin 54](#) – February 2022.

It was agreed that, in addition to distributing the [protected member letter](#) in advance of 1 April 2022, FRAs should contact all protected members once the transition into FPS 2015 has taken place; this is to ensure that members become familiar with some key features of the scheme. To help FRAs with this we have provided a [protected member communication post-April 2022](#) that can be used. It is strongly advised that FRAs send this communication to all former protected active members as soon as possible.

Contingent decisions – Optant outs

On 25 March 2022, we shared a communication with relevant stakeholders on contingent decisions, more specifically on the area of optant outs. The communication confirmed that, due to the pension changes in 2015 and the subsequent introduction of FPS 2015, some firefighters chose to opt out of the pension scheme rather than transition into FPS 2015. The government has recognised in its [Public Service Pensions consultation response](#) that some members would have taken a different course of action had they known that continued membership of their legacy scheme (FPS 1992, FPS 2006 including special members) during the remedy period was an option. The government therefore intends to legislate for decisions such as this through the contingent decision aspect of the retrospective legislation. This is confirmed in [section 5 of the PSPJOA](#).

Although the final policy on this matter is yet to be determined and we cannot provide any guarantees that a particular case will be deemed a contingent decision, we thought it would be prudent to bring the matter to FRAs' attention so that action can be taken where required.

It is our understanding that contingent decisions only cover the remedy period (1 April 2015 to 31 March 2022). This means that should a member remain opted out beyond 1 April 2022 they may, under retrospective legislation, be given the option to buy back their opted-out service which occurred during the remedy period. However, it is unlikely that regulations will permit them to buy back service after 31 March

2022. This could therefore mean that their pension would remain deferred with a payment age of 60 for FPS 1992 and 65 for FPS 2006 (special members have a deferred payment age of 60), regardless of whether they buy back the opted-out service during the remedy period.

We understand that some members have indicated that they want to buy back their opted-out service for the remedy period, as they want to retire as an active member. If this is the case, members should speak with their pension/payroll department and arrange to be opted back into the FPS on or before 1 April 2022.

FRA's were strongly advised to communicate this message with staff. As expected, this communication generated a significant amount of interest from members, and we received many questions in respect of this. Unfortunately, as a final policy decision is yet to be determined, we cannot provide any more clarity on this matter. We understand that members have questions about whether the contingent decision provision captures them and their personal set of circumstances. We also understand that members want to understand the cost implications and what repayment options may look like. However, we cannot provide definitive further clarity at this time. We appreciate that this is frustrating for all concerned and give our assurance that more detail will be provided as and when it is available.

Cost control valuation 2016 finalised

Following HM Treasury's publication of Amending Directions in October 2021, the Home Office has finalised the 2016 valuations for the FPS providing certainty on the outcome to scheme members.

On 16 March 2022, the [final outcome of the cost-control element of the 2016 valuation](#) for the FPS in England was published, confirming a breach to the cost cap ceiling of 14.6%.

This process had previously been paused following the uncertainty arising from the McCloud and Sargeant judgments and was 'un-paused' in 2020.

The report confirms that the cost control element 2016 valuation is not used to set the employer contribution rate and changes to the employer contribution rates resulting from the 2020 valuations will take effect from April 2024.

In 2021, the government [announced proposed reforms to the Cost Control Mechanism](#) which will be implemented in time for the 2020 valuations. These reforms do not affect the 2016 valuations as the government previously decided that it would be inappropriate to reduce member benefits based on a mechanism that may not be working as intended.

The government therefore announced that any ceiling breaches found when schemes complete the 2016 valuations will be waived. This means that no member will face a reduction in their benefits as a result of the 2016 valuation.

We reported in November that unions across the public sector had launched a judicial review against the government about including McCloud/ Sargeant remedy

costs in the cost control mechanism. The provisional results of the 2016 cost cap valuation showed that all public service schemes were cheaper than expected. This would have led to a reduction in contributions or improvements in benefits from April 2019 had the cost control process not been paused.

[The Home Office has published a set of FAQs](#) on the valuation results to assist stakeholders.

FPS England SAB updates

HMT respond to the SAB on immediate detriment

We reported in [FPS Bulletin 52](#) that the chair of the SAB had written an [open letter to HMT on the withdrawal of the Home Office informal guidance](#) on immediate detriment. The letter, dated 17 December 2021, asked for more information on the risks and uncertainties which HMT said arose as a result of processing cases ahead of legislation.

On 23 March 2022, [HMT provided a response outlining the factors behind the withdrawal](#) in more detail. The response highlights that Section 61 of the Equality Act 2010 does not, in HMT's opinion, allow for amendment of a member's tax position. The response details several tax complexities which have been identified and will be dealt with through legislation.

The SAB acknowledges the response, which has been shared with the LGA and the FBU as parties to the Memorandum of Understanding/Immediate Detriment Framework

Other News and Updates

PSPJOA 2022 receives Royal Assent

The Public Service Pensions and Judicial Offices Bill received Royal Assent on 10 March 2022 and became the [Public Service Pensions and Judicial Offices Act 2022](#) (PSPJOA 2022), which will come into force on 1 April 2022.

The PSPJOA 2022 legislates for how the government will remove the discrimination identified by the courts in the way that the 2015 reforms were introduced for some members.

The main elements of the Act are:

- Changes implemented across all the main public service pension schemes in response to the Court of Appeal judgment in the McCloud and Sargeant cases.
- Eligible members of the main unfunded pension schemes have a choice of the benefits they wish to take for the "remedy period" of April 2015 to 31 March 2022.

- From 1 April 2022, when the remedy period ends, all those in service in main unfunded schemes will be members of the reformed pension schemes, ensuring equal treatment from that point on.
- Bespoke measures implement corresponding changes in the Judicial Pension Schemes and Local Government Pension Scheme to reflect their different arrangements.
- Ensures there are no reductions to member benefits as a result of the 2016 cost control valuations.

These changes provide public service workers with greater certainty of their benefit entitlements. Going forwards, public servants will receive guaranteed pension benefits, but on a fairer basis, and in a way that ensures that they are affordable and sustainable into the future.

DWP consultation on pensions dashboards

On 11 March 2022, the LGA and SAB submitted their responses to the Department for Work and Pensions (DWP) [consultation on the draft Pensions Dashboards Regulations 2022](#) in respect of the Firefighters' Pension Schemes.

Pensions Dashboards will allow individuals to see information about all their pensions, including the State Pension, in one place. These draft regulations set the requirements to be met to deliver this and will place a legal duty on pension providers to provide information to the dashboards. The consultation proposes a staging deadline of the end of April 2024 for public service pension schemes, including the Firefighters' Pension Scheme. This means that Fire scheme administrators will need to be able to connect to the digital architecture by this date and be ready to provide individuals' data to them via the dashboards.

While the LGA and SAB are supportive of dashboards and their purpose, there are strong concerns over the proposed staging schedule given the conflicting pressures faced by administrators and the data that will be available at that time. The [LGA response to the DWP consultation](#) and the [SAB response to the DWP consultation](#) both therefore ask for the staging date to be delayed a further 12 months until April 2025

2. Member Issues

None

3. Administration Update

Hot Topics

To help keep you up to date with the latest scheme and administration news make sure you follow our client blog, Hot Topics at:

www.wypfpensionmattersfire.wordpress.com/

To follow the blog, click follow and put in your work email address. You'll then be notified every time we add something to it.

ID / MoU questionnaire

Earlier this year we emailed all FRA clients with the ID/MOU questionnaire, thank you to all those that have replied. However, many clients haven't, and can I urge all those that haven't to please complete the questionnaire and return it to WYPF no later than **30 April**.

This information is extremely important to the success of your schemes administration. You may recall that the request included a spreadsheet questionnaire that asked what your FRA has decided to do for ID and under which provision. Of course, if your opinion has now changed since submitting your completed questionnaire please advise WYPF of that as well.

Matthews

To reiterate the LGA message, please ensure you reply to LGA regarding the number of aggregation cases that apply to your FRA. WYPF have received a couple of queries from clients regarding this matter, however, it is the responsibility of the FRA to provide this information. Furthermore, as the qualification criteria is contractual, rather than pensionable, WYPF does not hold this information.

Please note, that the LGA has already recommended the FRAs should start work now identifying the population of individuals who will be in scope for the second options exercise. Doing this work now will enable FRAs to thoroughly prepare their data in time for consultations and regulations.

Preparing for year-end

As we are now past March FRAs should be progressing well with the month 12 file. Please remember, month 12 postings are key to important statutory duties undertaken by WYPF (such as annual benefit statements and pension saving statements). WYPF will provide more detail on this year's benefit statement in a future report.

Discretions

Does your FRA have a comprehensive suite of discretions for each of the schemes? WYPF website contains client discretions where we've been given them...and for many clients WYPF have not yet received a copy. If you have completed your discretions, please email WYPF and we will publish them on our website.

If you do not have any discretions can I remind every FRA it is the responsibility of the Scheme Manager of each FRA to draft, maintain and publish their discretions. It's quite a large undertaking if you don't have a policy on discretions (or you just have a 2015 discretions policy containing the 3-4 areas requested by LGA back in 2015!). However, an FRA without discretions is not fulfilling their statutory obligations under the scheme regulations and expose themselves to an increased risk of error in benefit values, complaints and sanction by the Pension Ombudsman. The scheme is currently going through a period of amendment due to the McCloud Remedy and now is an ideal time to address scheme discretions

Further information including discretions templates can be found on [FPS Regulations website in the 'Administration Resources' and then 'Guides and sample documents'](#) area.

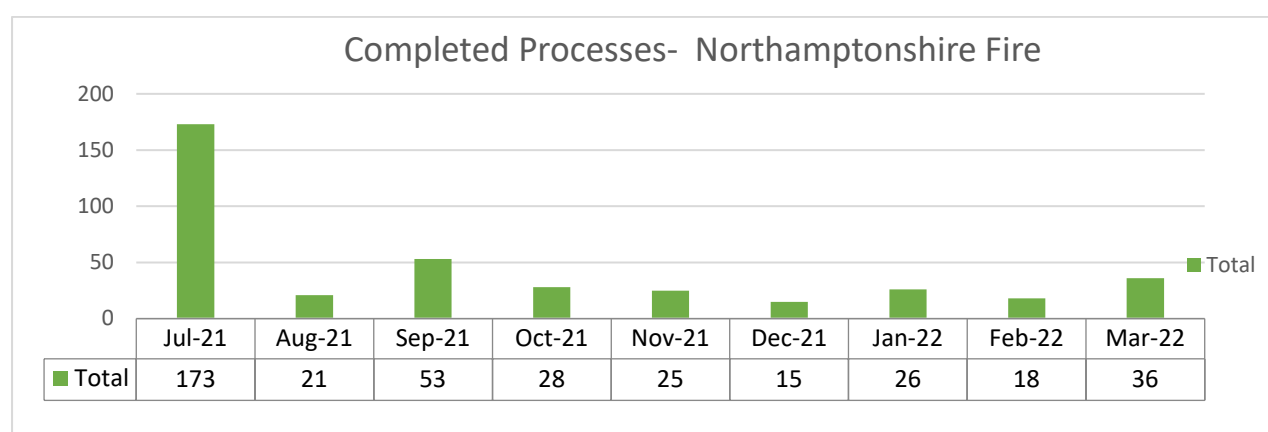
McCloud Costs

We have previously reported on the potential software costs for McCloud and how that would be charged to your Fire Authority. WYPF will not now be looking to charge separately for this, instead the costs for our FRAs will be based on the total clients Fire service and will be recovered over a 5 year period through the normal cost per member administration charge. This will be capped at £18 per member to ensure there are no big increases for you.

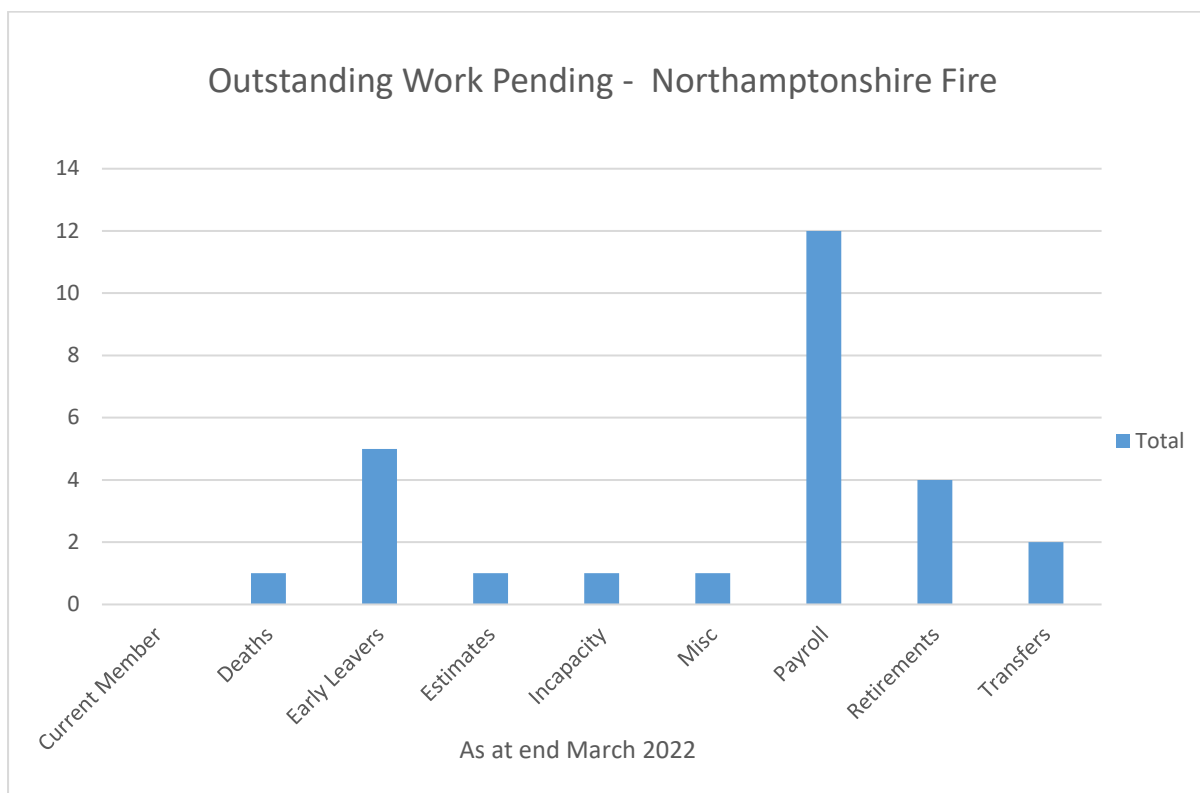
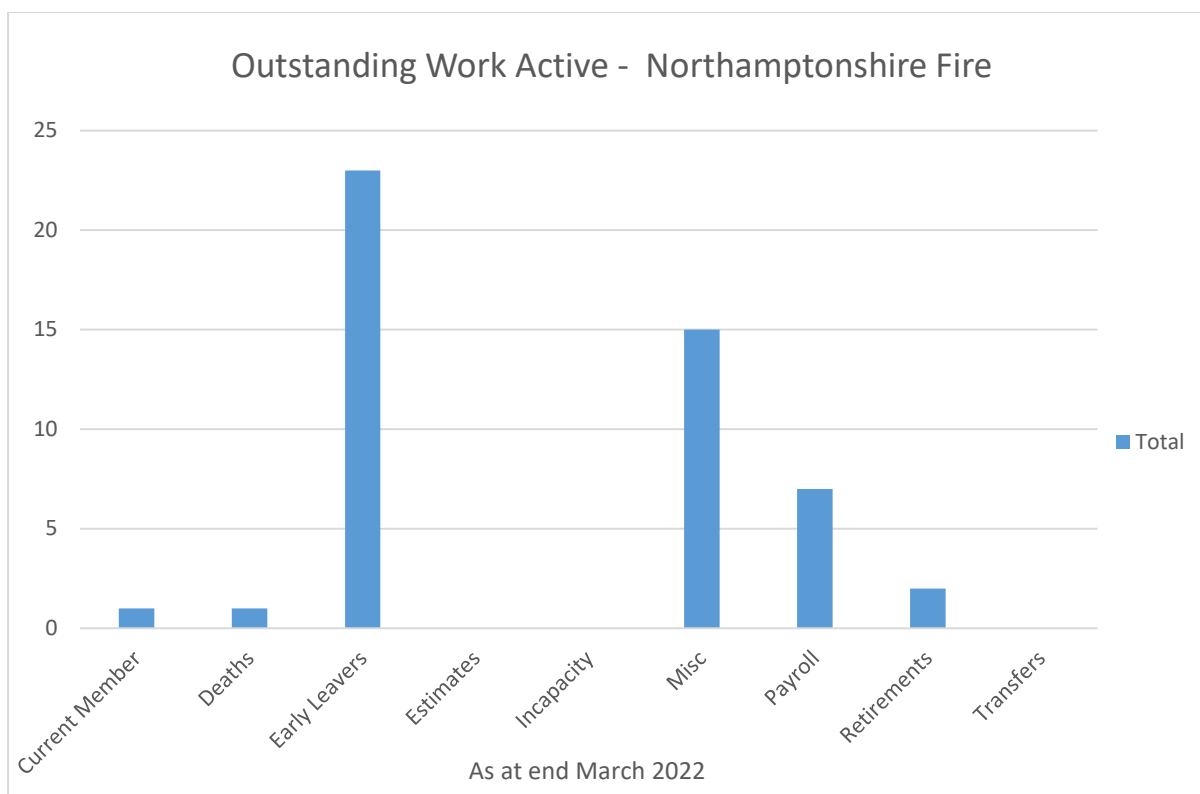
4. Key Performance Indicators

Completed processes

Northamptonshire Fire (1 to 31 March 2022)						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Transfer In Actual	1	10	1	85	100	1
Deferred Benefits Set Up on Leaving	2	10	1	85	50	78
Pension Set U/Payment of Lump Sum	5	3	5	85	100	1
Deferred Benefits Into Payment/Payment of Lump Sum	1	3	1	85	100	3
Retirement Actual	5	10	5	85	100	1
Refund Quote	2	10	0	85	0	26.5
Change of Address	1	20	1	85	100	1
General Payroll Changes	12	20	12	85	100	1
NI adjustment to Pension at State Pension Age	1	20	1	85	100	16
Enquiry Fire	1	10	1	85	100	1
Death Grant Nomination Form Received	1	20	0	85	0	37
Spouse Potential	1	20	0	85	0	22
Initial letter Death in Retirement	1	5	1	85	100	2
Death in Retirement	1	5	1	85	100	1
Refund Actual	1	20	1	85	100	4
Monthly Pension	444	Pay date	444	100	100	



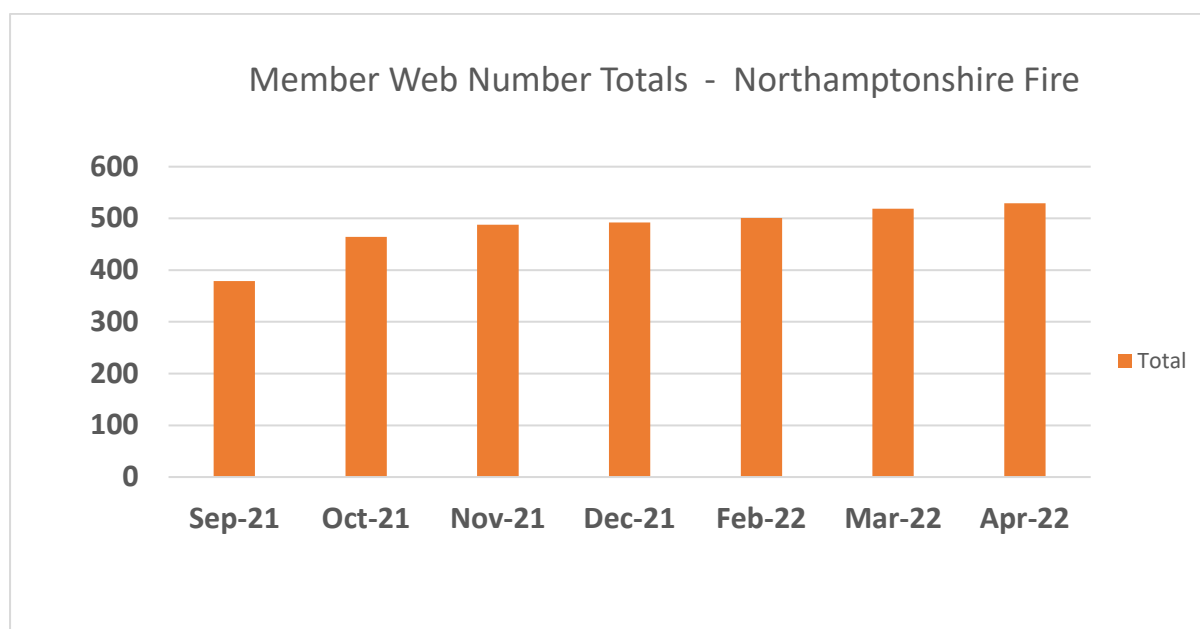
5. Work in Progress



6. Member Web Registrations

The number of members signed up to member web are:

Status	Number
Active	353
Pensioner	71
Pensioner Ex-Spouse	0
Beneficiary Pensioner	0
Deferred Ex-Spouse	0
Deferred	105

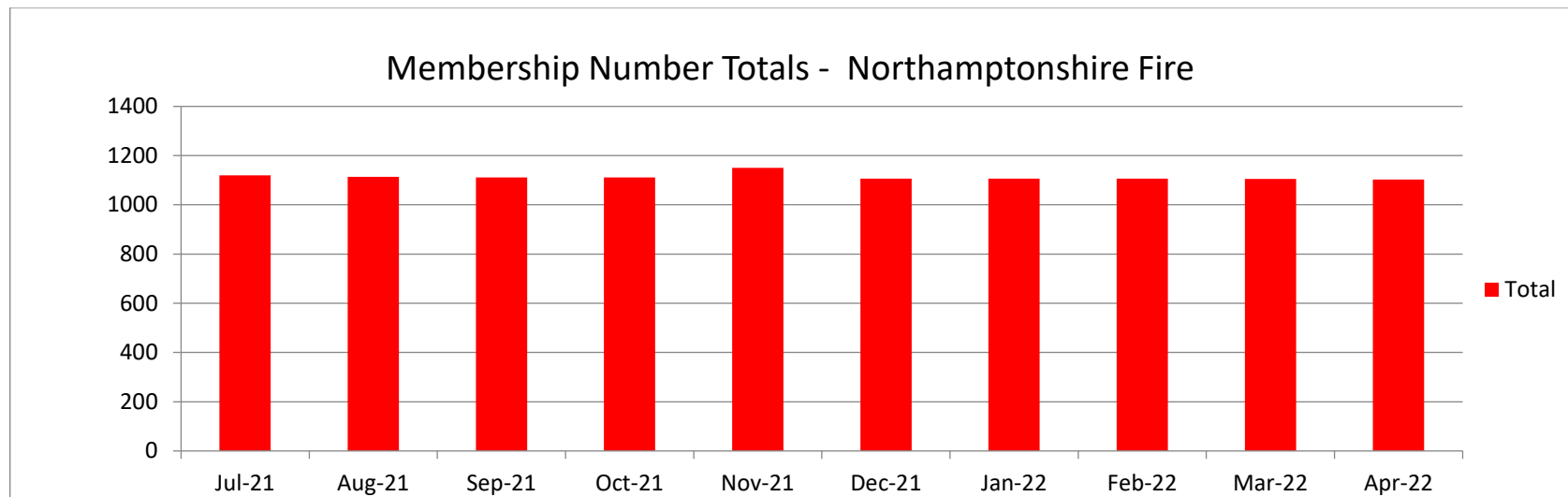


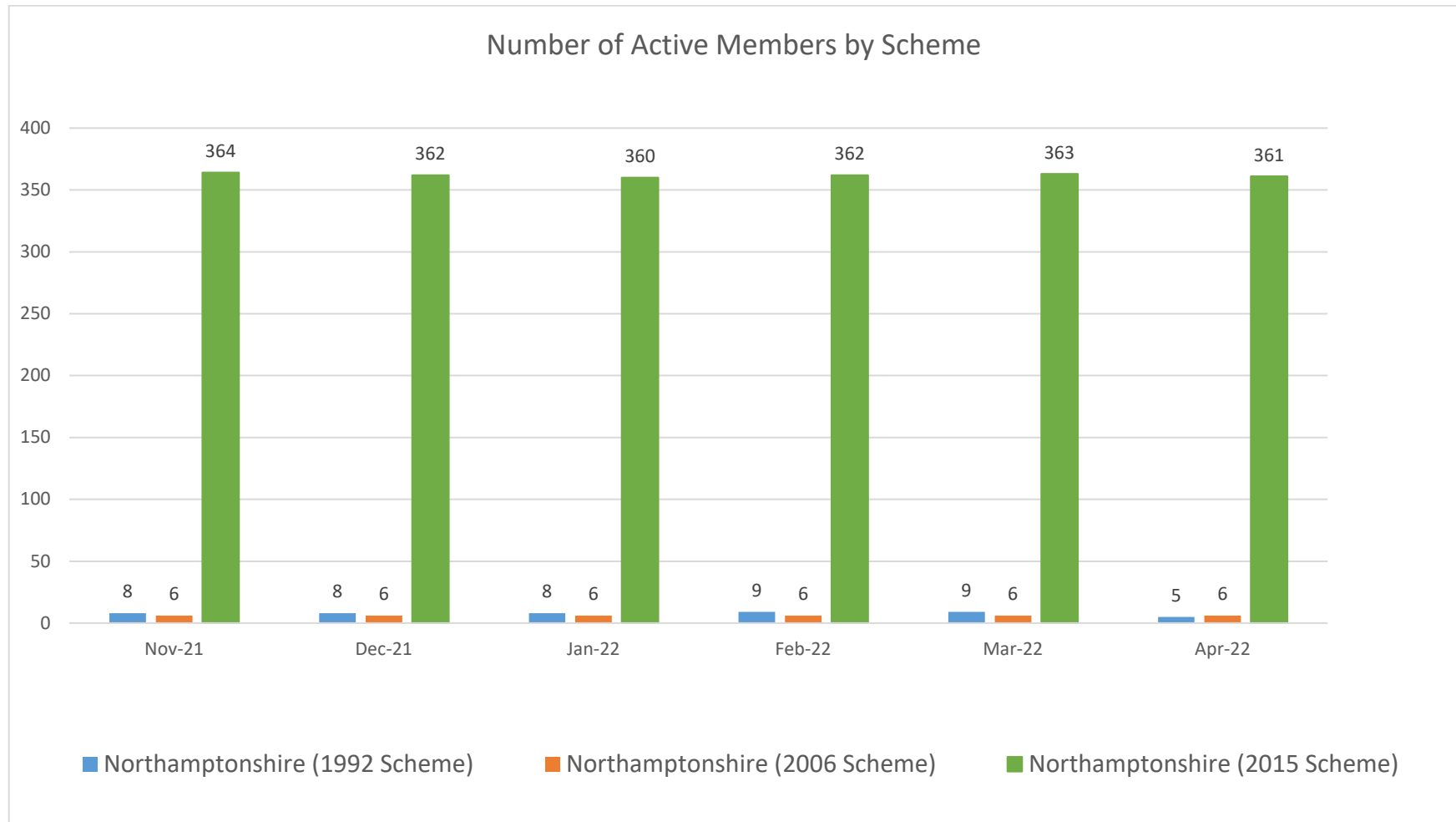
7. Calendar of Events

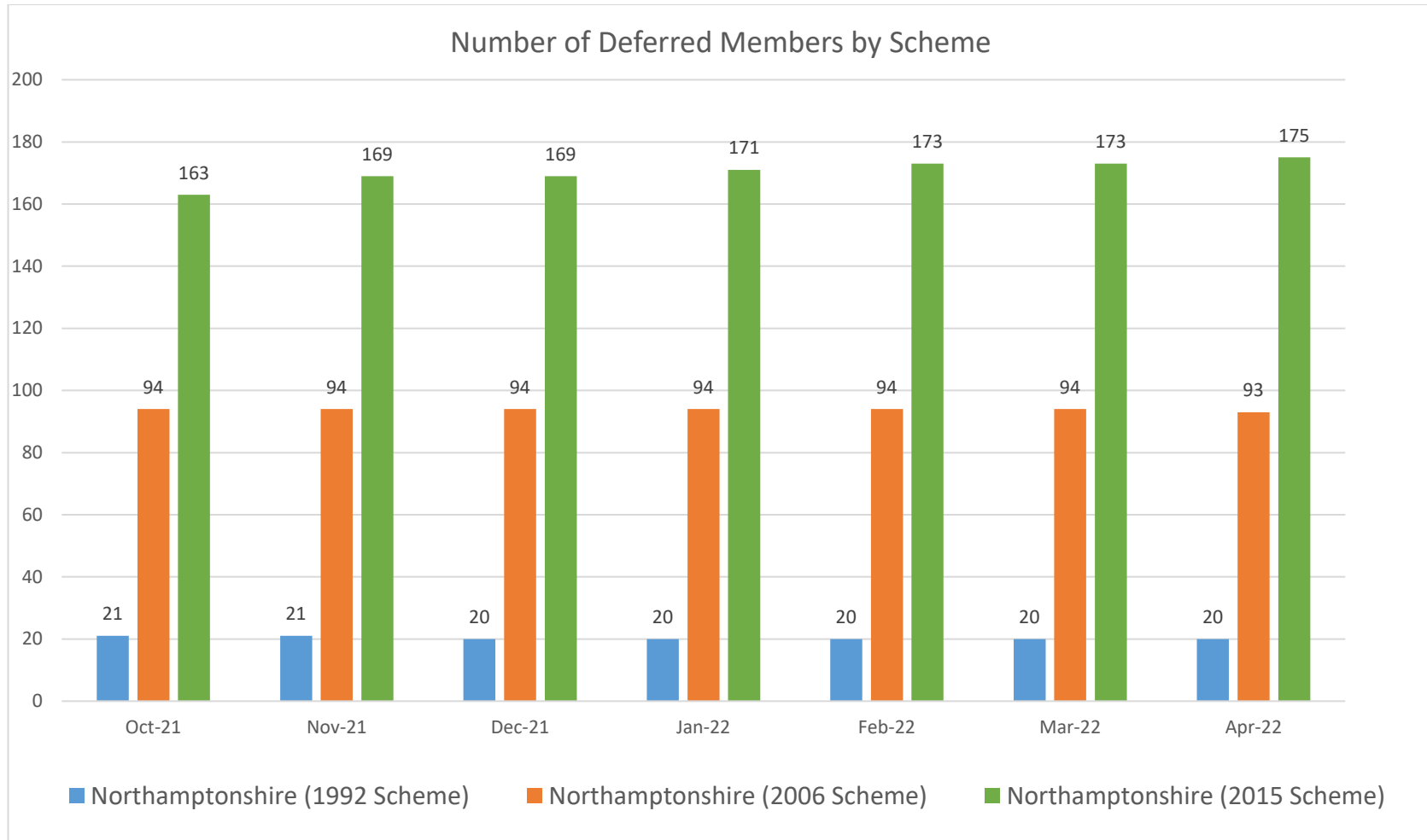
January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet?	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's Life Certificates Pensioner Newsletter
May	June	July	August
Roll out of Monthly Postings 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

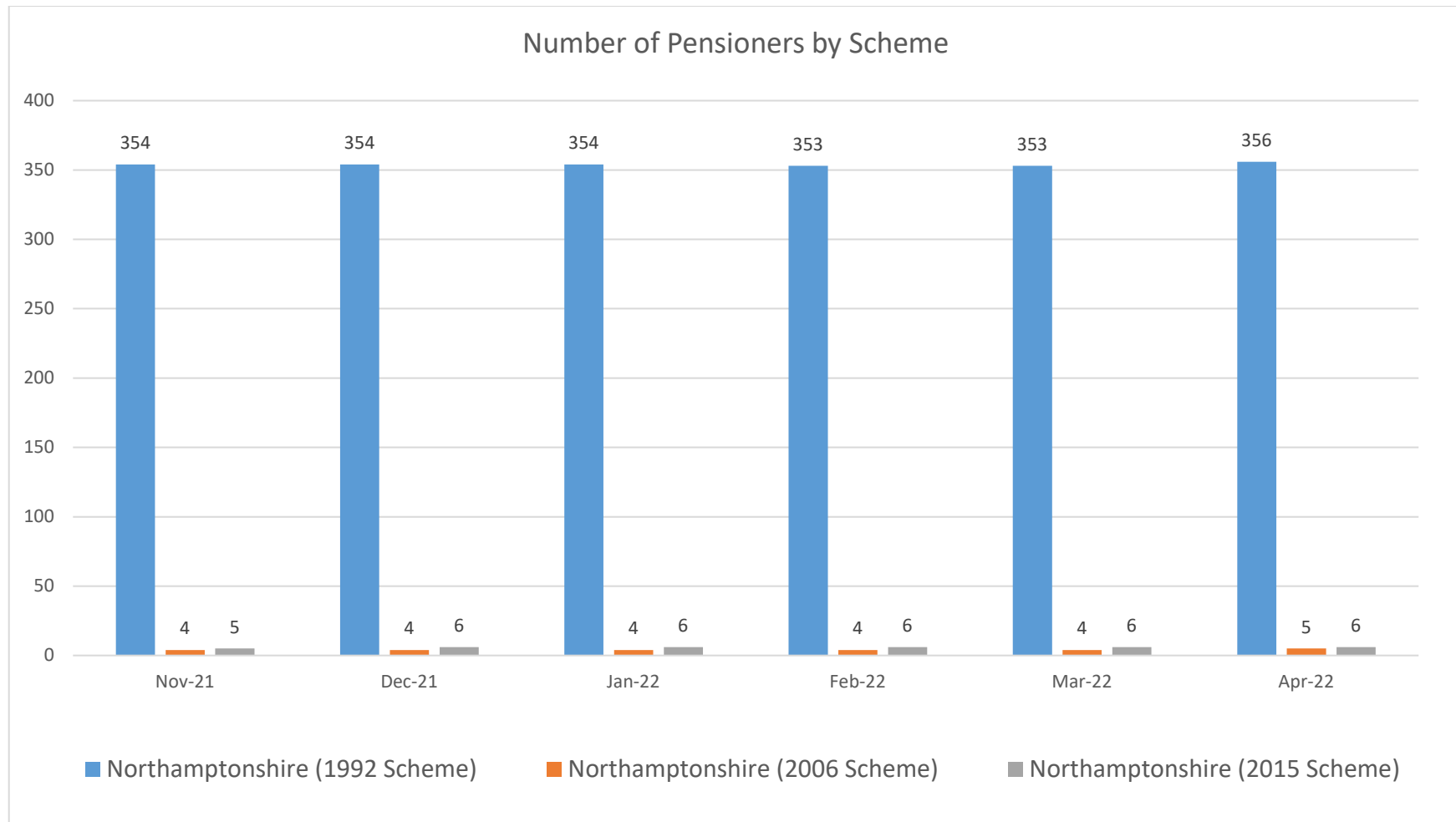
8. Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Northamptonshire (1992 Scheme)	5	20	356	55	0	0
Northamptonshire (2006 Scheme)	6	93	5	1	11	0
Northamptonshire (2015 Scheme)	361	175	6	0	4	6









9. Five Year Audit Plan 2019 – 2024

West Yorkshire Pension Fund Five Year Audit Plan 2019 - 2024	Frequency	Last Audit	Recommendations	Days	19/20	20/21	21/22	22/23	23/24	Total
Annual Accounts Verification	Annual	Jul 18	1	10	✓	✓	✓	✓	✓	
Audits Per Year					1	1	1	1	1	5
Benefits										
Local Government Scheme Contributions	2 Yearly	Nov 18	0	20			✓		✓	
New Pensions and Lump Sums - WYPF										
- Normal and Early Retirements	5 Yearly	Mar 15	0	25	✓					
- Death in Service, Post Retirement Widow and Dependent Benefits	5 Yearly	Mar 17	0	20			✓			
- Ill Health Pensions	5 Yearly	Oct 13	2	20					✓	
- Flexible Retirements	5 Yearly	Apr 16	1	20		✓				
- Deferred Pensions	5 Yearly	Mar 18	0	20				✓		
Transfers Out	3 Yearly	Nov 17	0	20		✓				
Transfers In	3 Yearly	Sep 16	2	20	✓		✓			
Reimbursement of Agency Payments	5 Yearly	Mar 18	2	15				✓		
Life Certificates	5 Yearly	Oct 15	0	15		✓				
AVC Arrangements	5 Yearly	Sep 17	0	15				✓		
Admission of New Bodies	5 Yearly	Jan 15	0	20	✓					
Pensioners Payroll	2.5 years	Mar 16	3	20		✓			✓	
Purchase of Additional Pension	5 Yearly	Mar 17	1	15			✓			
Annual Benefits Statements	2.5 years	Oct 16	0	20	✓			✓		
New Pensions and Lump Sums - Fire Service	3 Yearly	Jul 18	1	15		✓			✓	
Audits Per Year					4	5	4	4	4	21

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	0
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	0
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

Monthly Report

May 2022

Northamptonshire Fire Authority



Prepared by:

Yunus Gajra

Business Development Manager

Tel: 01274 432343

Mobile: 07582105760

Email: Yunus.gajra@wypf.org.uk

West Yorkshire Pension Fund

Aldermanbury House

4 Godwin Street

Bradford

BD1 2ST

www.wypf.org.uk

Follow WYPF on Twitter www.twitter.com/wypf_lgps

Follow WYPF on Facebook www.facebook.com/westyorkshirepensionfund



European Pensions

AWARDS 2019



WINNER

Pensions Administration Award (Pension Fund)

Contents

1 Regulations/Fire Scheme Update.....	4
2 Member Issues	11
3 Administration Issues.....	12
4 Key performance Indicators	14
5 Work in progress.....	15
6 Member web registrations.....	16
7 Calendar of Events	17
8 Membership Numbers	18
9 Five Year Audit Plan	22
10 Overriding Disclosure Time Limits.....	23

1.0 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 56 - April 2022 \(fpsregs.org\)](https://www.fpsregs.org/)

FPS

Matthews – Second options exercise

In [FPS Bulletin 55 – March 2022](#) readers were informed on the progress of the second options exercise for retained firefighters. An action arising was for FRAs to identify any retained firefighters who have transferred from retained to whole time employment and maybe subject to aggregation. Since publication, we have met with colleagues from the Home Office and Government Actuary's Department (GAD), and it has become apparent through our discussions that additional data is required.

On 14 April 2022, an email was sent to lead FRA contacts asking for them to complete a short questionnaire which sets out what data is required and the purpose of the data.

As we are now asking for additional data, we feel that it is appropriate to extend the deadline from 31 May 2022 by an additional month to 30 June 2022. We appreciate that this is a significant ask and understand that FRAs may be focused on other areas, such as age discrimination remedy, however, we would not request this information if it was not vitally important.

ACTION: FRAs to complete data request questionnaire by 30 June 2022.

Payroll workshop

We were pleased to hear that, as we have now passed 1 April 2022, some FRAs have now shifted their attention to the data collection work needed for retrospective remedy. While this position is correct for many, we are aware that some FRAs haven't started this work yet. We have received feedback that this is primarily down to lack of confidence in the subject area.

Readers should be aware that there is a suite of tools available at their disposal to help with the data collection work. As well as providing a [remedy data collection guidance document](#), you also have access to a [blank remedy data collection template](#) and remedy data collection template note for completion. These documents are freely accessible on the [FPS Regs and Guidance Website](#) and are stored under the [Implementation section of the Age discrimination remedy page](#).

While we appreciate that there is a relative amount of guidance out there, we are conscious that some people feel more comfortable discussing things as a group, rather than tackling them alone. We are therefore proposing to host a workshop which will be aimed at individuals within FRAs who have some form of responsibility over the data collection extract. We are labelling this as a payroll workshop; however, it will be your opportunity to raise any questions you may have in relation to the data extraction.

If this is something that you feel you and your FRA would benefit from, then please email bluelightpensions@local.gov.uk confirming the name of your FRA and who should be included on the invite.

In addition to the above, we are seeking volunteers from FRAs to give the group some feedback on their initial experiences with the data collection work. If this is something you would feel comfortable doing, then again please drop an email to bluelightpensions@local.gov.uk. Any help and support from the sector is much appreciated. Although we don't have a fixed date yet, we would ideally like to do this before the end of May. Please can we therefore request that all expressions of interest are submitted by Friday 13 May.

ACTION: FRAs to register interest in workshop event by 13 May 2022.

FRA pension contacts

Following feedback, we have received from colleagues, we understand that not all of our messages are shared as intended within an organisation. We would therefore like to know who at your FRA needs to be sent information on generic pension related matters.

As a minimum we would like to include the Scheme Manager and at least one person who has day to day responsibility for pensions.

Please can you therefore provide the name and email address for your FRA's Scheme Manager and confirm names and email addresses for anyone else who needs to be included in our communications. We are happy to send communications to generic pension inboxes if this is your preferred method of communication.

Please send this information no later than 31 May 2022 by email to bluelightpensions@local.gov.uk.

ACTION: FRAs to provide LGA with information on who should receive generic pension information by 31 May 2022.

FPS England SAB updates

Member benefit illustrations

Friday 1 April 2022 saw the first major milestone in age discrimination remedy (McCloud/ Sargeant or the 2015 Remedy) for the Firefighters' Pension Schemes, with the two final salary schemes being closed to future pension build-up and all members building up benefits in the reformed CARE scheme from that point.

To coincide with this and to provide members with a better understanding of the implications of remedy on their benefits, the Firefighters' Pensions (England) Scheme Advisory Board (SAB) worked with Barnett Waddingham to produce [a suite of illustrative member scenarios](#).

The illustrations are based on different scheme memberships, scenarios and salary profiles, with benefits shown at a range of key retirement milestones.

The member benefit illustrations follow the "Your questions answered" fact checker produced in February 2022 which aims to answer some recurring questions that members have about the 2015 Remedy.

[SAB respond to Home Office consultation response on prospective remedy](#)

On 20 April 2022, the SAB submitted a letter to the Home Office acknowledging the consultation response on regulation amendments to deliver prospective remedy for the FPS.

The SAB noted the response and welcomed the opportunity to engage further with the Home Office on issues falling outside the scope of the consultation, such as the ill-health process and early retirement factors for the FPS 2006. A full summary of the Board's discussion will be available in the meeting minutes of 24 March 2022, when published.

The SAB registered concern about the significant workload that implementation of Sargeant and Matthews within the required timescales will place on the Fire sector. The SAB felt that some smaller FRAs may be disproportionately impacted due to limited resource. The SAB also expressed concern about the likely requirement to comply with pensions dashboard regulations within a similar timeframe.

[Other News and Updates](#)

[Combatting pension scams](#)

Too few pension scheme trustees are protecting savers by reporting suspected scams, says The Pensions Regulator (TPR).

In November 2020, TPR launched its Pledge to [Combat Pension Scams](#), which encourages schemes to do more to protect savers from scammers, including reporting suspected scams to the authorities – Action Fraud.

So far, over 400 schemes have pledged or self-certified they meet the campaign's saver-protecting principles covering an estimated 16 million pension pots.

[Annual allowance changes](#)

The Government has changed the annual allowance rules. This has been done by section 9 of the Finance Act 2022 and the Registered Pension Schemes (Miscellaneous Amendments) Regulations 2022. The changes apply in certain situations where annual allowance calculations for previous years are retrospectively amended.

The following is the LGA's interpretation of the changes, which we emailed to lead FRA contacts on 5 April 2022. We thank our colleagues on the LGPS team for sharing this information with us.

Step 1: An employer becomes aware that information previously given was insufficient

The new regulations require employers to provide further information to administrators. This will apply where an employer becomes aware that information

they provided previously, for a Pension Input Period (PIP) falling within the 'relevant time', was insufficient to enable the authority to correctly calculate the annual allowance.

The 'relevant time' begins with the start of the tax year six years before the 'current tax year' and ends with the end of the 'current tax year'. The 'current tax year' means the tax year in which the employer became so aware. So, if this happens in tax year 2022/23, the following PIPs will fall within the relevant time:

- 6 April 2022 to 5 April 2023
- 6 April 2021 to 5 April 2022
- 6 April 2020 to 5 April 2021
- 6 April 2019 to 5 April 2020
- 6 April 2018 to 5 April 2019
- 6 April 2017 to 5 April 2018
- 6 April 2016 to 5 April 2017

The employer must provide the further information within three months of becoming aware the information was insufficient or, if later, on or before 6 July following the end of the relevant PIP. The further information must enable the administrators to correctly recalculate the annual allowance.

Note: FRAs must continue to provide administrators with any other changes that arise either outside of the relevant time or that do not affect the calculation of the annual allowance.

Step 2: The administrator must recalculate the annual allowance for the relevant PIP

If the administrator receives the further information from the employer for a PIP falling within the 'relevant time', it must recalculate the annual allowance. The 'relevant time' for this begins with the start of the tax year six years before the 'current tax year' and ends with the end of the 'current tax year'. The 'current tax year' for this purpose means the tax year in which the authority received the further information.

Administrators must also recalculate annual allowance amounts where there has been a change to the scheme rules. This will apply if the change results in a change to an annual allowance calculation for a PIP falling within the 'relevant time'. The 'relevant time' begins with the start of the tax year six years before the 'current tax year' and ends with the end of the 'current tax year'. The 'current tax year' for this purpose means the tax year in which the rule change is made. After recalculating the annual allowance, if the member:

- exceeds the annual allowance for the relevant tax year - the administrator must send a pension savings statement to the member. It must send this within three months of receiving the further information/the rule change being made or, if later, by

the 6 October following the end of the relevant tax year. They must also send an event report telling 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 report relates. It is not relevant whether the administrator had previously sent a pension saving statement for this period.

- does not exceed the annual allowance for the relevant tax year and the administrator has previously sent a pension savings statement for that period, it must send an updated statement. It must send this within three months of receiving the further information/the rule change being made, or, if later, by the 6 October following the end of the relevant tax year.

Deadline to make or amend mandatory scheme pay elections extended

Members must give mandatory scheme pays elections by no later than 31 July in the year following that in which the 'relevant tax year' ends. 'Relevant tax year' means the tax year the member exceeded the annual allowance

However, for members who received a pension savings statement as a result of a recalculation under step 2, this deadline will likely have expired. For these cases, section 9 of the Finance Act 2022 extends the deadline if:

- the administrator gave the statement within the 'relevant time', and
- as a result of that statement, the member qualifies to elect for mandatory scheme pays.

'Relevant time' means a time falling:

- on or after 2 May in the year following the end of the relevant tax year, and
- before the end of the six-year period beginning with the end of the relevant tax year.

Where this applies, the member must instead give their election for mandatory scheme pays before:

- the end of the three-month period beginning with the day on which the administering authority gave the pension savings statement, or if earlier
- the end of the six-year period beginning with the end of the relevant tax year.

Though the 31 July deadline is extended in these cases, members remain unable to give a mandatory scheme pays election once they are entitled to payment of all their benefits under the scheme or, if earlier, once they have reached age 75.

The mandatory scheme pays deadline is not extended for members who previously qualified to elect for mandatory scheme pays in respect of the relevant tax year but chose not to. If the member did elect for mandatory scheme pays, the member will need to amend their initial election based on the recalculated amounts.

The new regulations have also changed the time limit for amending mandatory scheme pays elections. The time limit is set out in Regulation 4 of the Registered Pension Schemes (Notice of Joint Liability for the Annual Allowance Charge)

Regulations 2011. Before, members had until the 31 July following the end of the four-year period beginning with the last day of the relevant tax year to amend an election. With effect from 6 April 2022, this has been extended by two years. So, if a member exceeded the annual allowance in tax year 2019/20, the new deadline for giving the amended notice is 31 July 2026. The deadline was previously 31 July 2024.

Deadline for administrators to pay annual allowance charge to HMRC extended

Administrators must report and pay annual allowance charges to HMRC using Accounting for Tax (AFT) returns. Administrators must use the return for October to December in the year following that in which the tax year ends. Though, it can choose to use a return for an earlier period.

However, where the member makes a mandatory scheme pays election by the extended deadline, the deadline will likely have expired.

For these cases, section 9 of the Finance Act 2022 extends the deadline. Where members elect for mandatory scheme pays after 30 September in the year following that in which the relevant tax year ends, the administrator must report and pay the tax using the AFT return for the three-month period following the three-month period in which it receives the mandatory scheme pays election. Though it can choose to use the return for the period in which it received the election.

[PASA publishes fraud guidance on pre-employment vetting](#)

On 19 April 2022, the Pensions Administration Standards Association (PASA) published [fraud guidance on vetting new employees](#).

PASA has been made aware of cases of fraud undertaken or assisted by pension administration employees. In some cases, individuals deliberately gained employment with the intention of committing fraud. The guidance aims to counter this risk.

[PDP progress update report published](#)

On 27 April 2022, the Pensions Dashboards Programme (PDP) published a video introducing the [April 2022 progress update report](#). The video outlines the programme activity over the past six months. This is the fifth progress update report and provides a summary of what PDP has achieved since October 2021.

HMRC

[Guaranteed Minimum Pension \(GMP\) equalisation newsletter – April 2022](#)

On 6 April 2022, HMRC published [Guaranteed Minimum Pension \(GMP\) equalisation newsletter – April 2022](#). This newsletter supplements previous guidance in Guaranteed Minimum Pension (GMP) equalisation newsletters [February 2020](#) and [July 2020](#) relating to benefit adjustments that registered pension schemes may have to make to remove inequalities arising from GMPs.

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.

The next session is due to take place on 3 May 2022.

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

5 April 2022 – Public Service Pensions and Judicial Offices Act

19 April 2022 – Remedy project management update

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.

FPS AGM – London – 25 and 26 October 2022 (save the date(s))

Our popular Fire Pensions Annual Conference is back for 2022! 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
- The Pensions Regulator
- 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. The topics of such are yet to be determined, however, we will be seeking views from the sector as to what topics they would like to be covered.

Day 1 – Tuesday 25 October 2022 16:30 – 18:30 Primarily for Scheme Managers and Local Pension Board chairs, day 1 of the conference will provide practical guidance on the role of the scheme manager and will offer the opportunity to network with counterparts in other FRAs. Following this session there will be a drinks reception on the terrace from 18:45.

Day 2 – Wednesday 26 October 2022 09:30 – 15:30 Day 2 of the conference provides delegates with an annual update on the Firefighters' Pension Scheme from key stakeholders.

The full programme and booking link will be available shortly.

CIPFA annual conference for Pension Board Members

Please see below details of a training event for board members which is being run by CIPFA. As the training is primarily aimed at LGPS local pension boards, but there is some cross-over with the uniformed public service schemes, CIPFA has offered a reduced rate for those involved in the governance of Fire pensions.

Event details: 09:30 - 16:00 Wednesday 18 May 2022

The Presentation Suite KPMG, 15 Canada Square, London E14 5GL

Key speakers:

The event will be chaired by Mark Wynn from Cheshire Pension Fund. You will hear from key speakers such as Roger Phillips and Bob Holloway from the LGPS SAB, as well as Nick Gannon from TPR.

Themes: The event will cover a number of key topics impacting Pension Boards. Of particular interest to Fire Board members include: TPR's New Single Code of Practice, Cyber Security and Good Governance. The event will also feature breakout sessions, where you will be able to discuss and share your views and experiences with other Board Members on the current issues impacting your role. The full agenda will be released before the conference.

Cost:

Discounted rate of £125 + VAT per delegate for Fire Pension Board Members. To take advantage of this special rate, please email CIPFA's Customer Service team via the link below.

This event may have a Hybrid attendance option, for delegates who do not wish to attend in person. This will be confirmed later. You can book onto the event at customerservices@cipfa.org.uk.

2. Member Issues

None

3. Administration Issues

To Note - These items appeared in the April report, please ensure you are compliant with them.

ID / MoU questionnaire:

Last month we reminded you all to submit the ID/MOU questionnaire, but to date 5 FRAs haven't completed the questionnaire.

This information is as extremely important to the success of your schemes administration. You may recall that the request included a spreadsheet questionnaire that asked what your FRA has decided to do for ID and under which provision. Of course, if your opinion has now changed since submitting your completed questionnaire please advise WYPF of that as well.

Also for FRAs who have for the first time have an ID case, please contact Helen Scargill, helen.scargill@wypf.org.uk

Matthews:

To reiterate LGA message, please ensure you reply to LGA regarding the number of aggregation cases that apply to your FRA. WYPF have received a couple of queries from clients regarding this matter, however, it is the responsibility of the FRA to provide this information. Furthermore, as the qualification criteria is contractual, rather than pensionable, WYPF does not hold this information.

Please note, that the LGA has already recommended the FRAs should start work now identifying the population of individuals who will be in scope for the second options exercise. Doing this work now will enable FRAs to thoroughly prepare their data in time for consultations and regulations.

Preparing for year-end:

As we are now past March FRAs should be progressing well with the month 12 file. Please remember, month 12 postings are key to important statutory duties undertaken by WYPF (such as annual benefit statements and pension saving statements). WYPF will provide more detail on this year's benefit statement in a future report.

Discretions:

Does your FRA have a comprehensive suite of discretions for each of the schemes? WYPF website contains client discretions where we've been given them...and for many clients WYPF have not yet received a copy. If you have completed your discretions, please email WYPF and we will publish them on our website.

If you do not have any discretion can I remind every FRA it is the responsibility of the Scheme Manager of each FRA to draft, maintain and publish their discretions. It's quite a large undertaking if you don't have a policy on discretions (or you just have a 2015 discretions policy containing the 3-4 areas requested by LGA back in 2015!). However, an FRA without discretions is not fulfilling their statutory obligations under the scheme regulations and expose themselves to an increased risk of error in benefit values, complaints and sanction by the Pension Ombudsman. The scheme is currently going through a period of amendment due to the McCloud Remedy and now is an ideal time to address scheme discretions

Further information including discretions templates can be found on [FPS Regulations website in the 'Administration Resources' and then 'Guides and sample documents'](#) area.

Additionally

Remedy:

Member benefit illustrations were issued to help members understand the impact(s) of remedy and these dovetail with the 'your questions answered' fact checked issued in February. Please do familiarise yourself with these resources and make them available locally to scheme members.

Return to the office:

Like many organisations, WYPF are returning to its offices in a hybrid capacity. This means scheme members can once again visit (if they're local or else fancy a trip to Bradford!) but we're stressing that people MUST make an appointment beforehand.

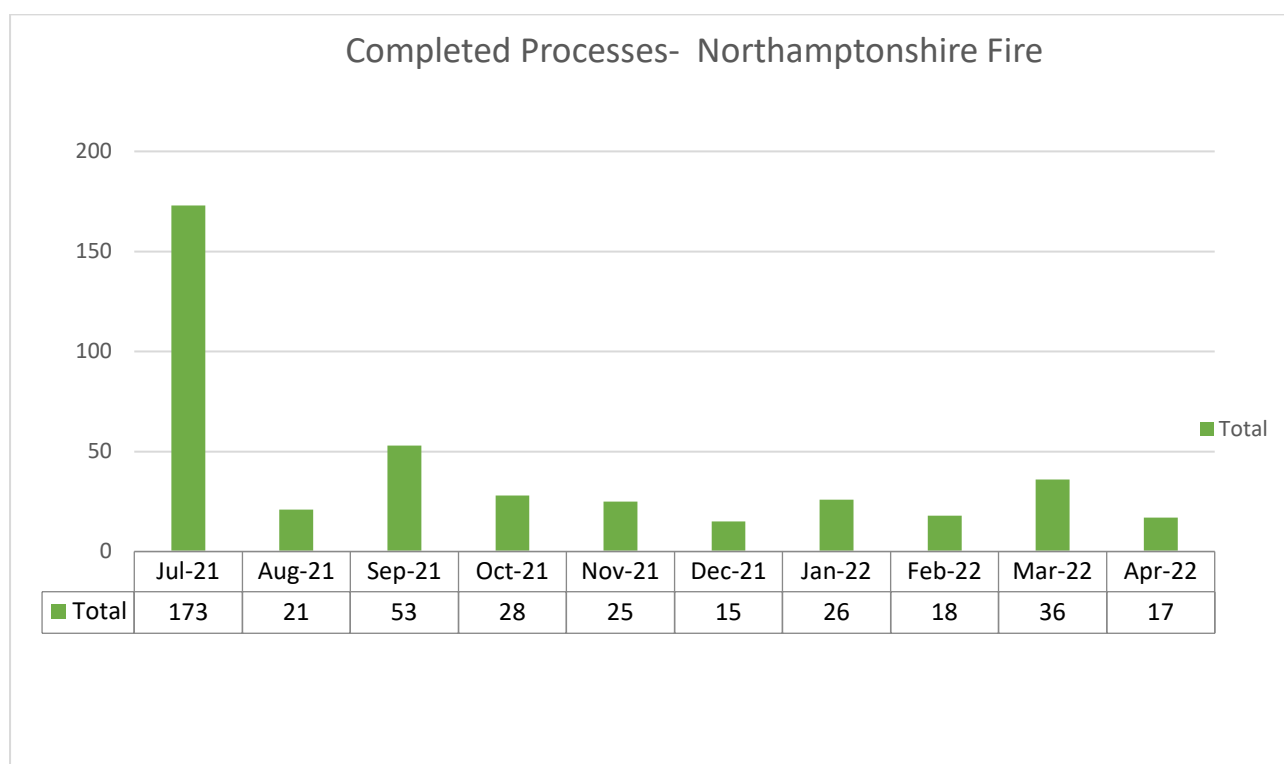
Fire client meeting:

Thank you to those who attended the recent meeting (20 April) via Teams. Hopefully you find the session informative, and minutes will be circulated in the near future.

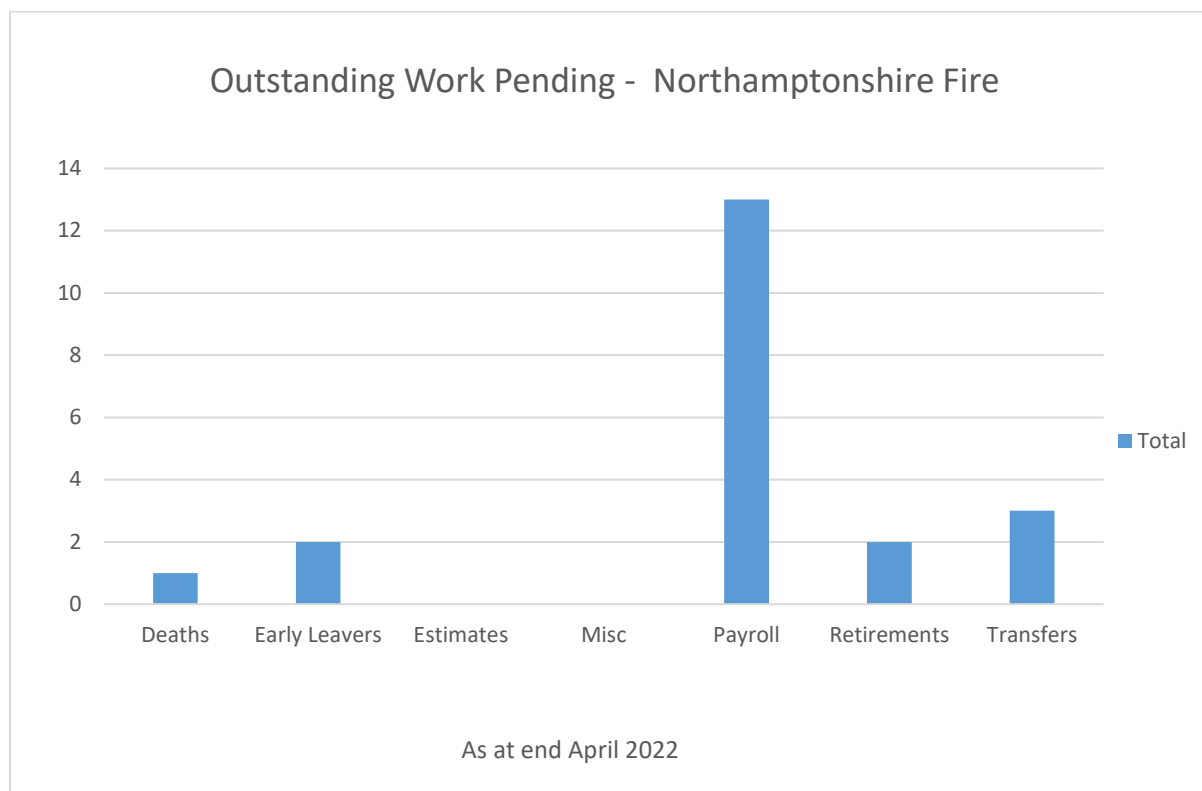
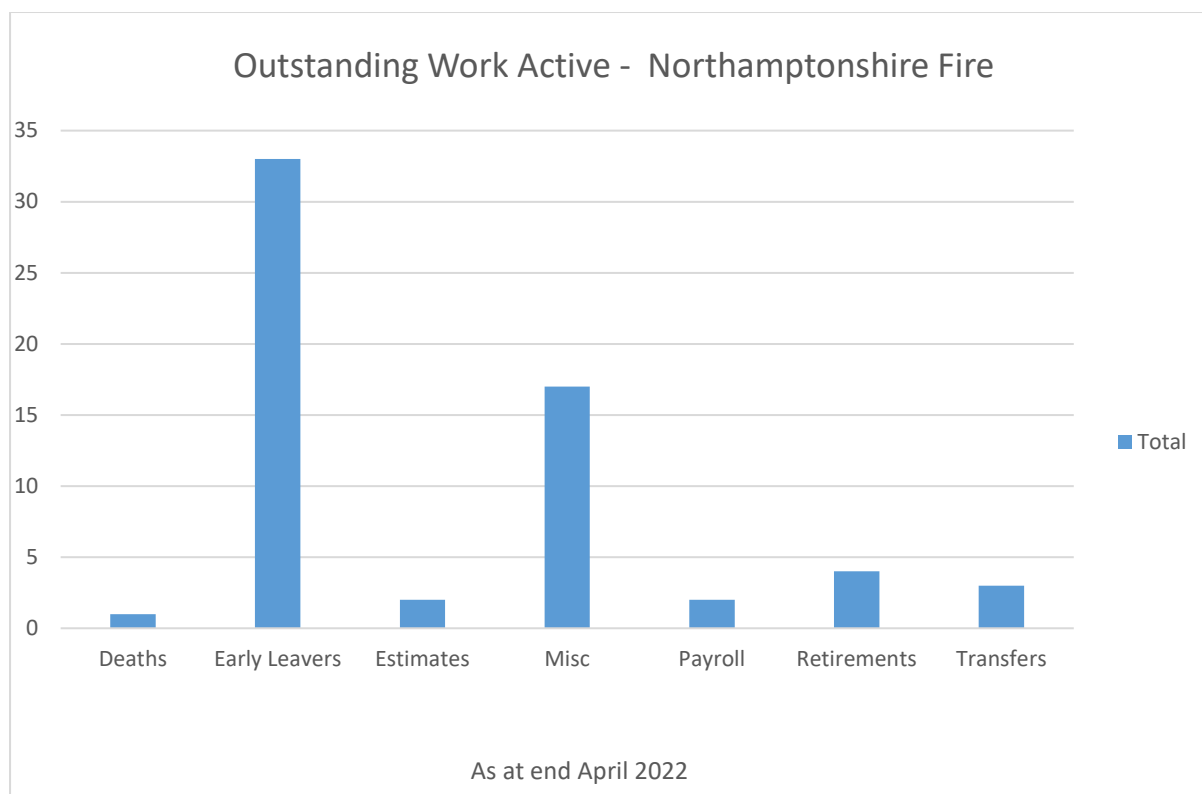
4. Key Performance Indicators

Completed processes

Northamptonshire Fire (1 to 30 April 2022)						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Deferred Benefits Set Up on Leaving	1	10	0	85	0	14
Pension Set Up/Payment of Lump Sum	1	3	1	85	100	1
Retirement Actual	1	10	1	85	100	1
Change of Address	1	20	1	85	100	2
General Payroll Changes	2	20	2	85	100	1
Age 55 Increase to Pension	2	20	2	85	100	9
NI adjustment to Pension at State Pension Age	1	20	1	85	100	10
Death Grant Nomination Form Received	5	20	5	85	100	9
Update Member Details	3	20	3	100	100	1
Monthly Pension	445	Pay date	445	100	100	



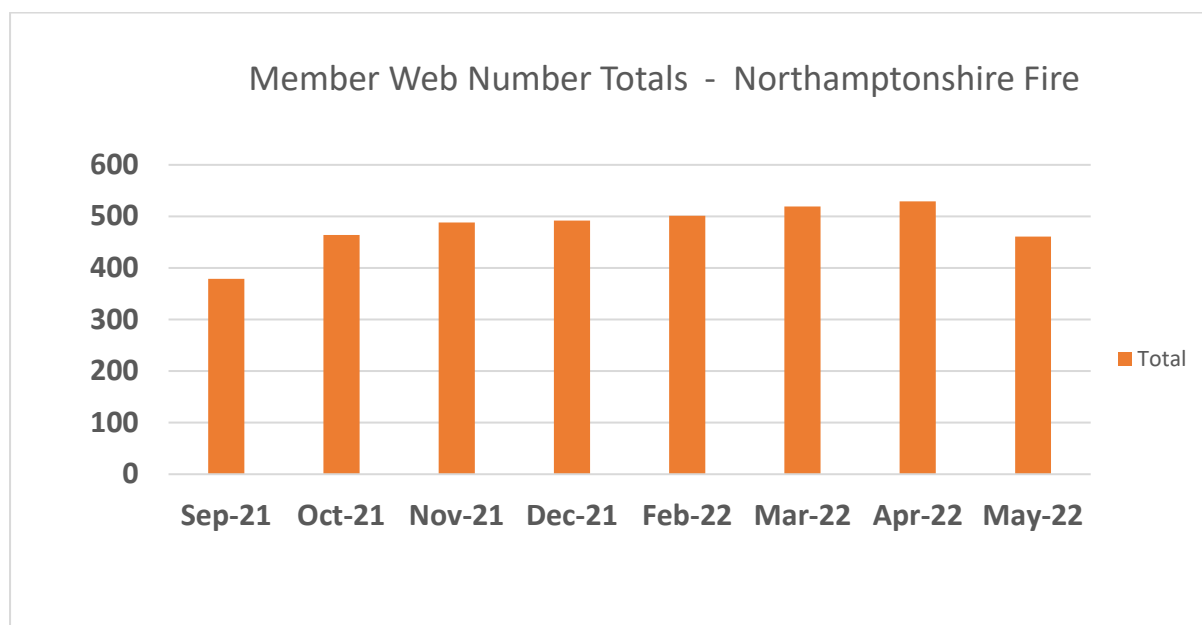
5. Work in Progress



6. Member Web Registrations

The number of members signed up to member web are:

Status	Number
Active	208
Pensioner	162
Pensioner Ex-Spouse	0
Beneficiary Pensioner	10
Deferred Ex-Spouse	0
Deferred	81

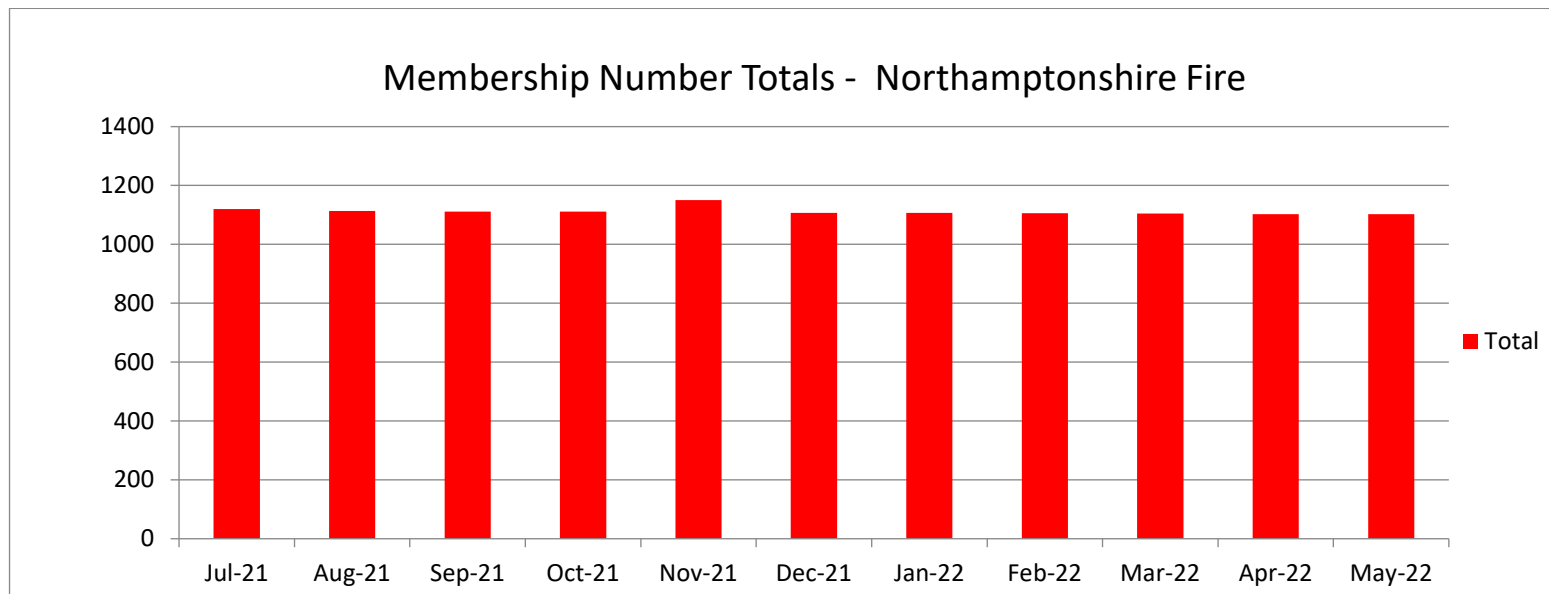


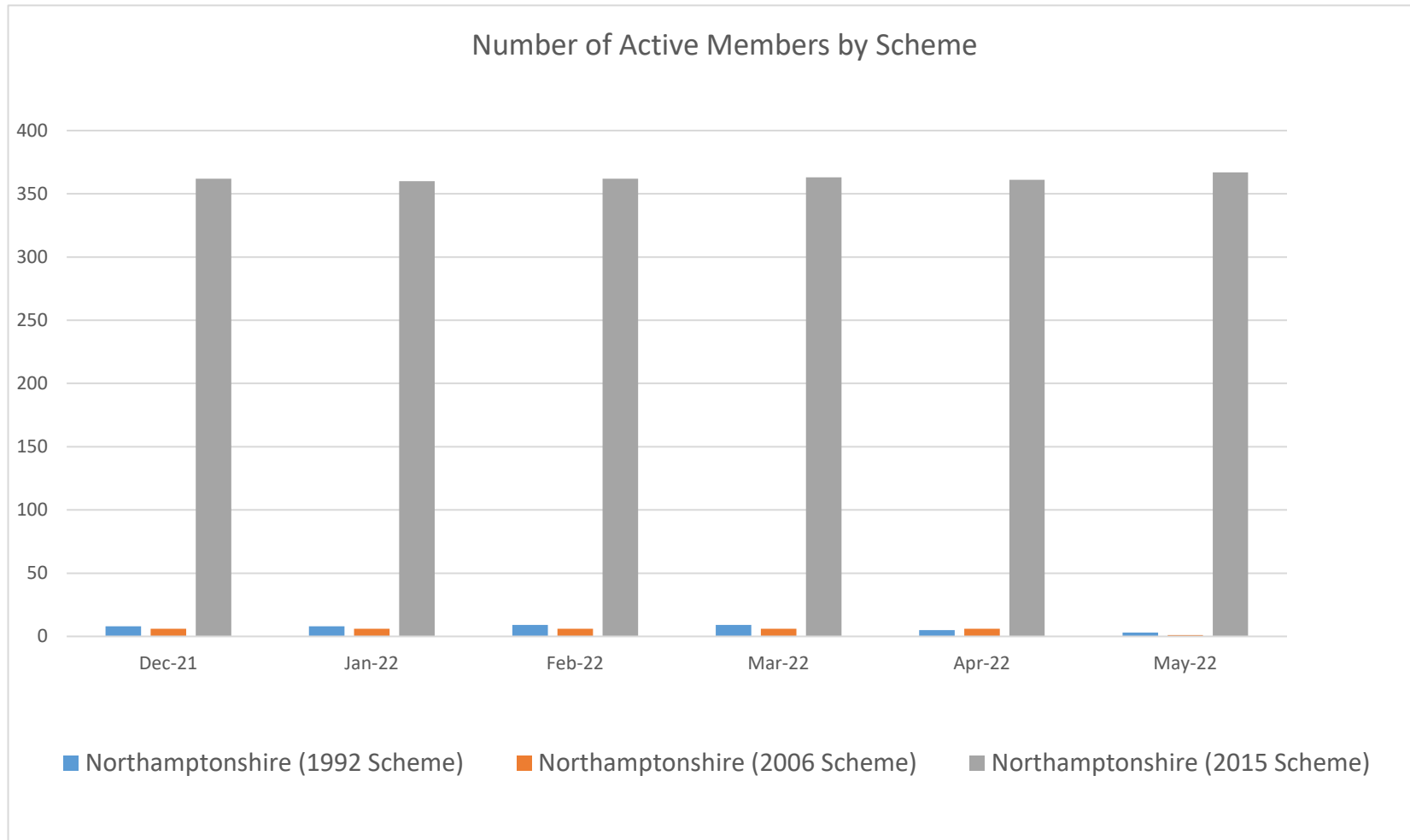
7. Calendar of Events

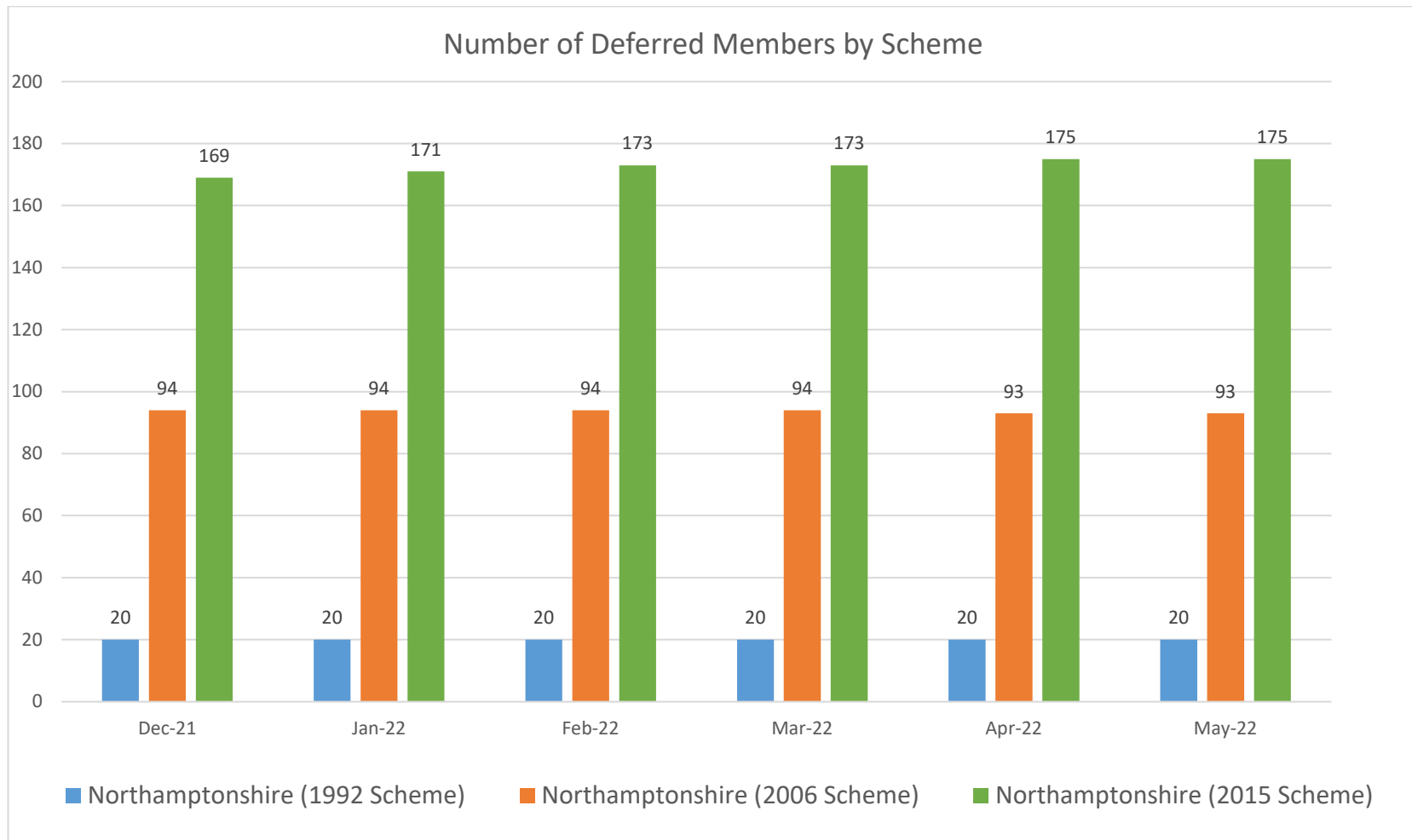
January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet?	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's Life Certificates Pensioner Newsletter
May	June	July	August
Roll out of Monthly Postings 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

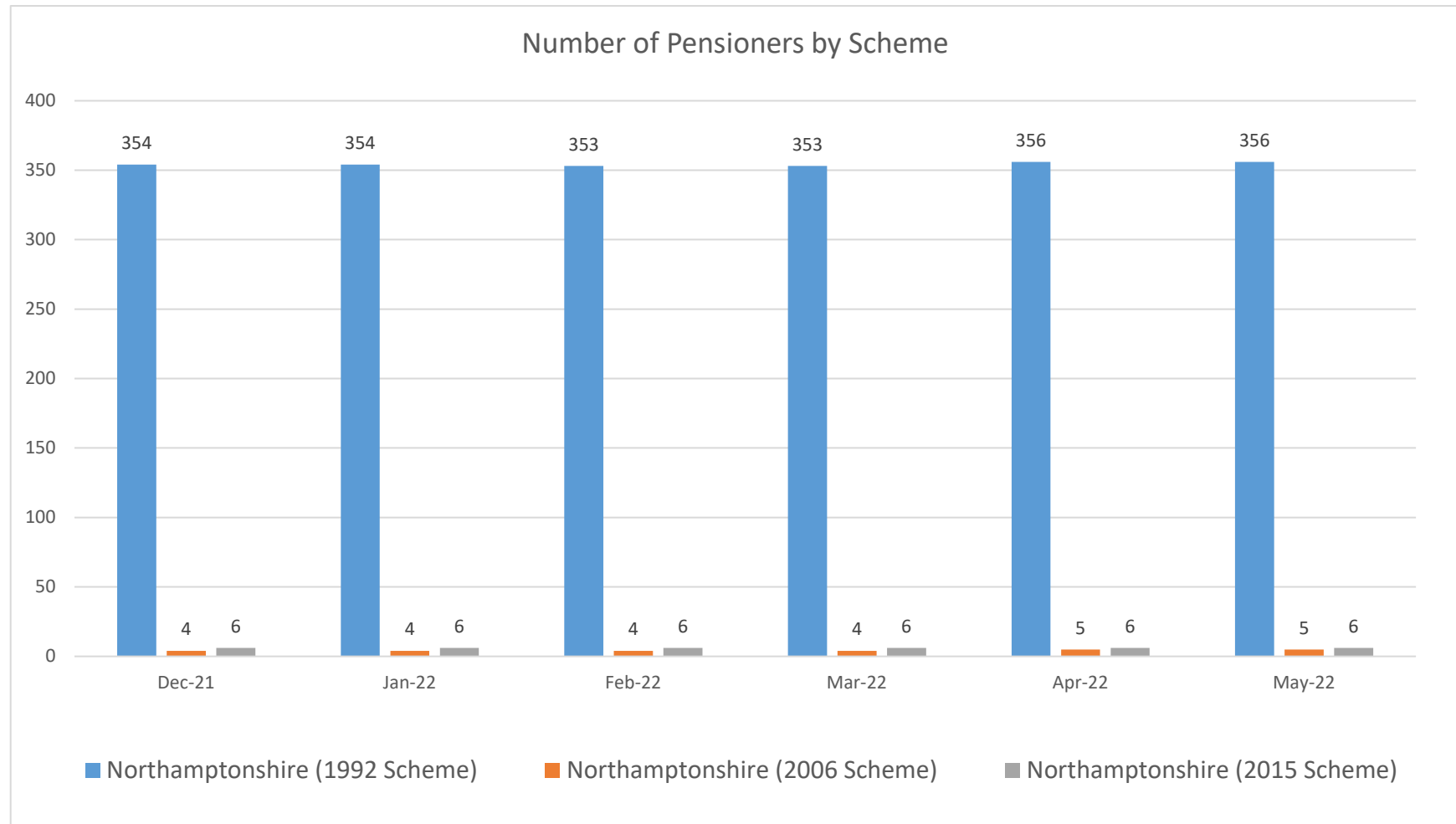
8. Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Northamptonshire (1992 Scheme)	3	20	356	55	0	0
Northamptonshire (2006 Scheme)	1	93	5	1	11	0
Northamptonshire (2015 Scheme)	367	175	6	0	4	6









9. Five Year Audit Plan 2019 – 2024

West Yorkshire Pension Fund Five Year Audit Plan 2019 - 2024	Frequency	Last Audit	Recommendations	Days	19/20	20/21	21/22	22/23	23/24	Total
Annual Accounts Verification	Annual	Jul 18	1	10	✓	✓	✓	✓	✓	
Audits Per Year					1	1	1	1	1	5
Benefits										
Local Government Scheme Contributions	2 Yearly	Nov 18	0	20			✓		✓	
New Pensions and Lump Sums - WYPF										
- Normal and Early Retirements	5 Yearly	Mar 15	0	25	✓					
- Death in Service, Post Retirement Widow and Dependent Benefits	5 Yearly	Mar 17	0	20			✓			
- Ill Health Pensions	5 Yearly	Oct 13	2	20					✓	
- Flexible Retirements	5 Yearly	Apr 16	1	20		✓				
- Deferred Pensions	5 Yearly	Mar 18	0	20				✓		
Transfers Out	3 Yearly	Nov 17	0	20		✓				
Transfers In	3 Yearly	Sep 16	2	20	✓		✓			
Reimbursement of Agency Payments	5 Yearly	Mar 18	2	15				✓		
Life Certificates	5 Yearly	Oct 15	0	15		✓				
AVC Arrangements	5 Yearly	Sep 17	0	15				✓		
Admission of New Bodies	5 Yearly	Jan 15	0	20	✓					
Pensioners Payroll	2.5 years	Mar 16	3	20		✓			✓	
Purchase of Additional Pension	5 Yearly	Mar 17	1	15			✓			
Annual Benefits Statements	2.5 years	Oct 16	0	20	✓			✓		
New Pensions and Lump Sums - Fire Service	3 Yearly	Jul 18	1	15		✓			✓	
Audits Per Year					4	5	4	4	4	21

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	0
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	0
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

Monthly Report

June 2022

Northamptonshire Fire Authority



Prepared by:

Matt Mott

Governance and Business Development Manager

Mobile: 07815 476877

Email: matt.mott@wypf.org.uk

West Yorkshire Pension Fund

Aldermanbury House

4 Godwin Street

Bradford

BD1 2ST

www.wypf.org.uk

Follow WYPF on Twitter www.twitter.com/wypf_lgps

Follow WYPF on Facebook www.facebook.com/westyorkshirepensionfund



Contents

1 Regulations/Fire Scheme Update.....	4
2 Member Update	9
3 Administration Update.....	10
4 Communication & Training	10
5 Key performance Indicators	11
6 Work in progress.....	12
7 Member web registrations.....	13
8 Calendar of Events	14
9 Membership Numbers	15
10 Five Year Audit Plan	19
11 Overriding Disclosure Time Limits.....	20

1.0 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 57 - May 2022 \(fpsregs.org\)](https://www.fpsregs.org/)

FPS

Matthews – Second options exercise

As mentioned in [FPS bulletin 56 – April 2022](#), the Home Office and GAD have asked for additional data on individuals who will be in scope for the second options exercise. On 14 April 2022, we sent an email to lead FRA contacts asking them to complete a short questionnaire which sets out what data is required and the purpose of the data.

This is just a gentle reminder that this request is still outstanding for some FRAs and the deadline for completion is **30 June 2022**. If any FRA has identified an issue with this deadline, we ask that they bring it to our attention at the earliest opportunity.

ACTION: FRAs to complete Matthews data request questionnaire by 30 June 2022.

Ill health “underpin”

At a recent coffee morning an FRA raised a question as to how the ill health underpin should be applied to a case. The policy intent is to ensure that a protected member who applies for IHR before 31 March 2022, where the application is determined in their favour after that date, is treated no less favourably than if the application had been determined on that date.

To avoid any such members being placed in a worse position, changes have been made to the reformed scheme rules. Regulations 65(2A) and (2B) have been inserted into the FPS 2015 regulations with effect from 1 April 2022. This means that for members where the ill-health assessment process began on or before 31 March 2022, the member is assessed for ill-health retirement against an NPA of 55. This will mean that there should be no cases where an affected member would have qualified for ill-health retirement under the legacy 1992 scheme but does not qualify under the reformed scheme.

The members benefit entitlement should be calculated in the same manner as set out in the FPS 2015 regulations.

Further information on this provision can be found in the Home Office's [consultation response on prospective remedy](#) and their [frequently asked questions document](#). We will look to provide a consolidated version of Regulation 65 in a future bulletin.

Abatement guidance

HM Treasury (HMT) policy requires public sector pensions to be abated in certain circumstances when a public sector employee is re-employed following retirement. The general principle behind abatement is to protect the public purse from paying a pension and a salary to the same individual i.e. the income from the public purse should not be increased by the addition of a pension.

FRA's must consider the application of abatement when it occurs in accordance with the regulations of the Firefighters' Pension Schemes

Readers may be aware that there is currently no prescribed guidance on how abatement should be applied or calculated, as previous guidance issued by the relevant Secretary of State at the time is now out of date. The Home Office is also unable to provide formal direction on the application of abatement, as it is the legal responsibility of each FRA to interpret and apply the rules of the scheme.

In order to support a consistent national approach, we are pleased to let you know that we have now published [informal abatement guidance for FRAs](#) in the "Guides and sample documents" section of www.fpsregs.org.

The guidance has been collated following the [2019 AGM abatement workshop](#) and using examples of accepted good practice at FRAs. We have consulted with FRA FPS practitioners and administration colleagues as well as the Scheme Advisory Board and Home Office ahead of publication.

The guidance will be kept under review and updated in line with any scheme changes. We also hope to add an example abatement policy in due course. We recommend that FRAs take the guidance into account when considering future cases.

Annual Benefit Statements 2022

At the [Fire Technical Working Group \(FTWG\) meeting on 7 March 2022](#) we discussed annual benefit statement production (ABS) for 2022. As ABS's in 2022 will be based on current scheme regulations up to 31 March 2022, it was proposed that the same process as last year is followed, and the statements caveated in a similar way. [FPS Bulletin 44 – April 2021](#) provides more information.

However, while the recommendation last year was to suppress projections for fully protected members which would have incorrectly forecast final salary benefits beyond 31 March 2022, administrators were asked to consider that projections for former protected members could be included this year on a fully CARE basis.

The group failed to reach a consensus on this matter, it was therefore agreed that administrators will make the final call on whether to include projections or not. It is the expectation that administrators will notify the FRAs they administer on their decision.

The standard ABS template and notes have been updated with the new scheme year and the revised caveat and [published on the FPS Regulations and Guidance website](#). Examples in the annexes have been brought up to date.

We will continue to review requirements for ABS over the coming years in line with HM Treasury (HMT) policy decisions on remedy.

FRA pension contacts

As mentioned in [FPS bulletin 56 – April 2022](#), we would like to know who at your FRA needs to be sent information on generic pension related matters. We originally asked for this information to be provided by 31 May 2022, however, we have only received a fraction of replies. Please can you give this matter your urgent attention and provide us with the name and email address for your FRA's Scheme Manager. In addition, please also confirm names and email addresses for anyone else who needs to be included in our communications.

Please send this information ASAP by email to bluelightpensions@local.gov.uk.

ACTION: FRAs to provide LGA with information on who should receive generic pension information ASAP.

FPS England SAB updates

TPR factsheet

We advised readers in [FPS Bulletin 47 – July 2021](#) that the results of the [2020-21 Governance and Administration survey](#) had been published by the Pensions Regulator (TPR).

As part of the annual survey, TPR measures six processes as key indicators of public service pension scheme performance.

The six processes are:

1. Documented policy to manage board members conflicts of interest
2. Access to knowledge, understanding and skills needed to properly run the scheme
3. Documented procedures for assessing and managing risks
4. Process to monitor records for accuracy / completeness
5. Process for resolving contribution payment issues
6. Procedures to identify, assess and report breaches of the law

In 2020-21, 74 per cent of Firefighters' schemes across the UK reported having all six processes in place. This had increased from 55 per cent in 2019.

We have refreshed [six key processes factsheet](#) to reflect the most recent results and give guidance to FRAs and their Local Pension Boards (LPBs) to improve understanding and compliance in the next survey.

SAB remedy engagement sessions

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.

The first meeting is due to take place on 24 June 2022 where the SAB will be discussing the interest and eligibility PDDs

Other News and Updates

DLUHC publishes statutory guidance on special severance payments

On 12 May 2022, the Department for Levelling Up Housing and Communities (DLUHC) published [statutory guidance on special severance payments](#). Best Value authorities in England must have regard to the guidance in circumstances in which it may be appropriate to make Special Severance Payments. The guidance also covers approval, disclosure and reporting requirements. The guidance does not apply to authorities in Wales. You can find a list of the bodies the guidance applies to at the end of the guidance.

The guidance confirms that:

- strain cost related to the early payment of LGPS benefits under regulation 30(6) or (7) (flexible retirement, redundancy, or efficiency retirement over age 55) does not constitute a special severance payment
- strain cost of awarding additional pension under regulation 31 of the LGPS Regulations 2013 may constitute a Special Severance Payment, depending on the terms of the individual's contract [Click here to return to Contents](#)
- strain cost related to waiving an actuarial reduction when a member retires under regulation 30(5) may constitute a Special Severance Payment, depending on the terms of the individual's contract.

DLUHC consulted on a draft version of this guidance in 2021.

Considering the above, we contacted the Home Office to establish whether any consideration needs to be taken of the strain costs for releasing benefits early under Authority/Employer initiated early retirement or waiving restricted commutation under the FPS. The Home Office confirmed that, although this policy sits outside of its pensions remit, it has contacted the policy lead at DLUHC, who has confirmed that both instances (i.e. fitness assurances and commutation uplift) would not fall within the scope of special severance payments.

HMRC

HMRC publishes Pension Schemes Newsletter 139

On 31 May 2022, HMRC published [Pension schemes newsletter 139](#), which contains articles on:

- relief at source — annual return of information for 2021 to 2022
- digitisation of relief at source
- managing Pension schemes service
- Accounting for Tax (AFT) returns

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.

The next session is due to take place on 14 June 2022.

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

[3 May 2022 – Contingent decisions](#)

[17 May 2022 – Transitional benefits post 1 April 2022](#)

[31 May 2022 – ABS and RSS](#)

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.

Payroll workshop

On 24 May 2022 we hosted a payroll workshop. The workshop was intended to bring the industry together and give colleagues an opportunity to share feedback and best practices on the data collection exercise needed for age discrimination remedy.

We are pleased to note that the session was well attended with over 50 delegates dialling in and participating in the discussion.

Slides covering the event have been made available and can be found on the [age discrimination implementation page of the FPS Regs and Guidance Website](#). The slides were updated to reflect the comments and suggestions made in the meeting. We will also be updating the [remedy data collection guidance](#) in the coming weeks.

Legislation

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](#)

2. Member Update

Member retired 21st April 2022.

The retirement notification was received on 8th April 2022 from the FRA.

The member's retirement pack was posted to him on 12th April 2022 and this returned to WYPF on 20th April 2022.

Members pension was set up for payment and the pension set up letter was issued on 14th April 2022. The letter that was issued confirmed an incorrect payment date of the 1st of every month, however this should have been the last day of every month.

The member then emailed WYPF on 29th April 2022 to query this. An email was issued in return to the members query on 4th May 2022 to confirm that the correct pension payment date is the last day of every month.

Member responded to the email on 4th May 2022 requesting further clarification. WYPF tried to call the member on 10th May 2022 but there was no answer. A voice message was left asking for the member to contact WYPF. No contact has been made again by the member in regards to this query.

No further action needed unless member contacts WYPF.

3. Administration Update

Matthews: to reiterate LGAs message, please ensure you complete LGAs questionnaire by **30 June 2022**.

Preparing for year-end: as we are now some time past March some clients have now submitted their month 12 file; if you haven't you should be well on your way to completing it.

Remember, month 12 posting is key to important statutory duties undertaken by WYPF (such as annual benefit statements and pension saving statements).

4. Communication & Training

Pre-retirement seminars attended by WYPF during May: none (will be included a standing item going forwards)

FRA training delivered by WYPF:

- o on-site training was delivered to NYFRS on completion and submission of portal notifications
- o an 'induction-style' overview of WYPF and its services was delivered to the recently-appointed pensions manager at WYFRS
- o induction training delivered for Shropshire FRS

If any FRA wishes to receive training, please contact WYPF for further information

Annual Benefit Statements (ABS)

Deferred ABS will be released on to My Pension by the end of July.

Active ABS will be released on to My Pension by the end of August.

Please note: the value of benefits shown on the ABS (including projections) will be correct under the current 2015 scheme regulations, however, they will not contain any values concerning the McCloud remedy.

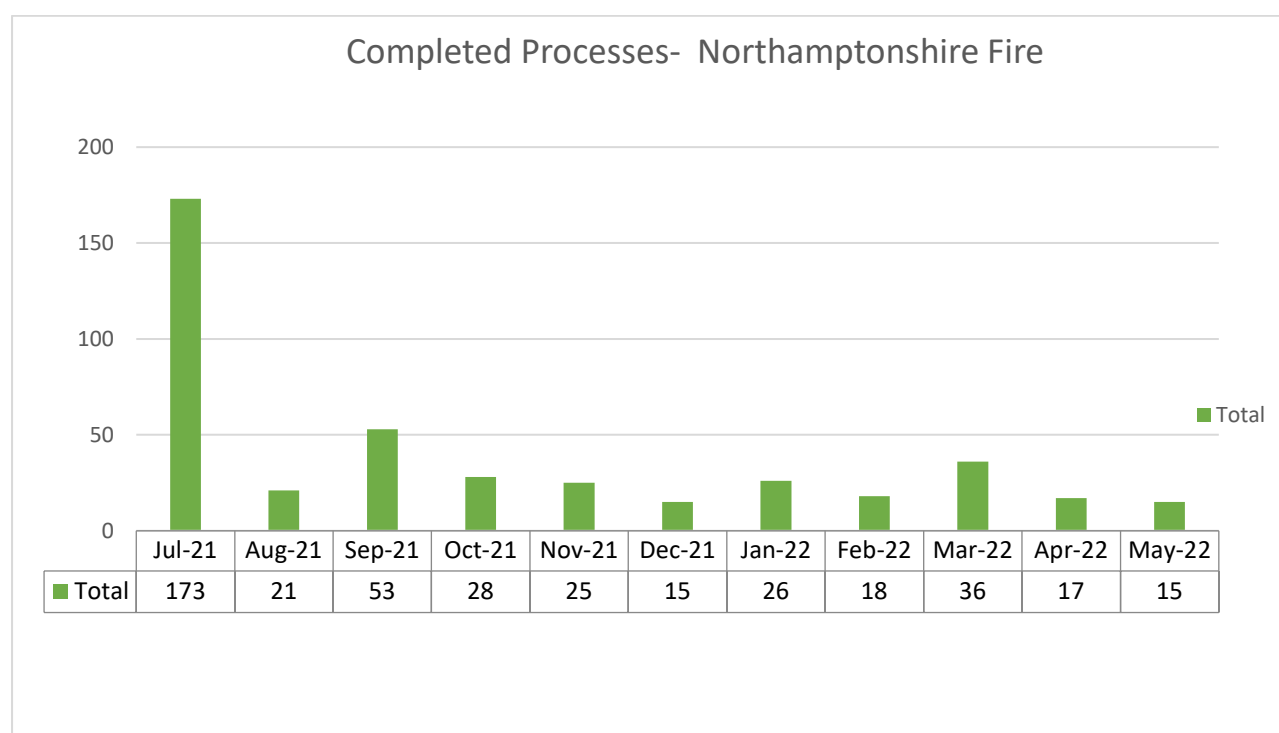
For information about Remedy and Immediate detriment, WYPF will continue to provide information as agreed with FRAs

Client Survey: WYPF is compiling our customer survey for 2022. When you receive it, please take a few moments to complete. Your opinion is important to us and helps us understand your needs and develop our service to you.

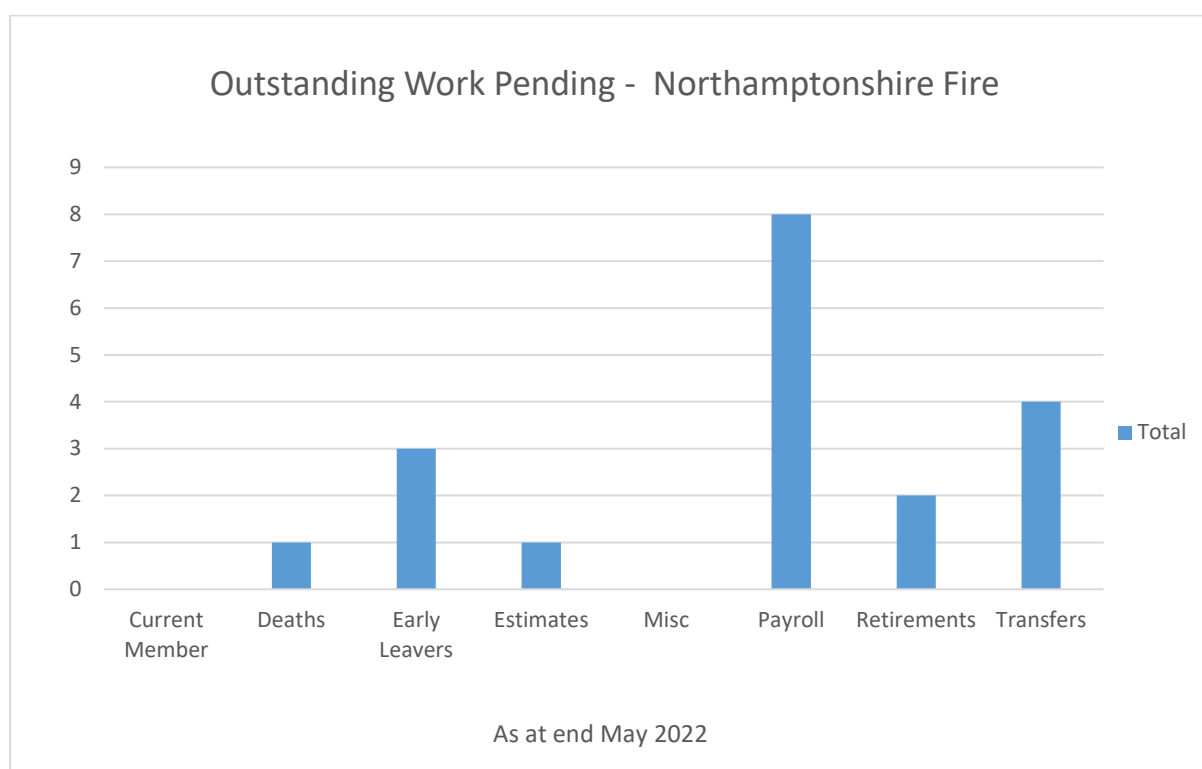
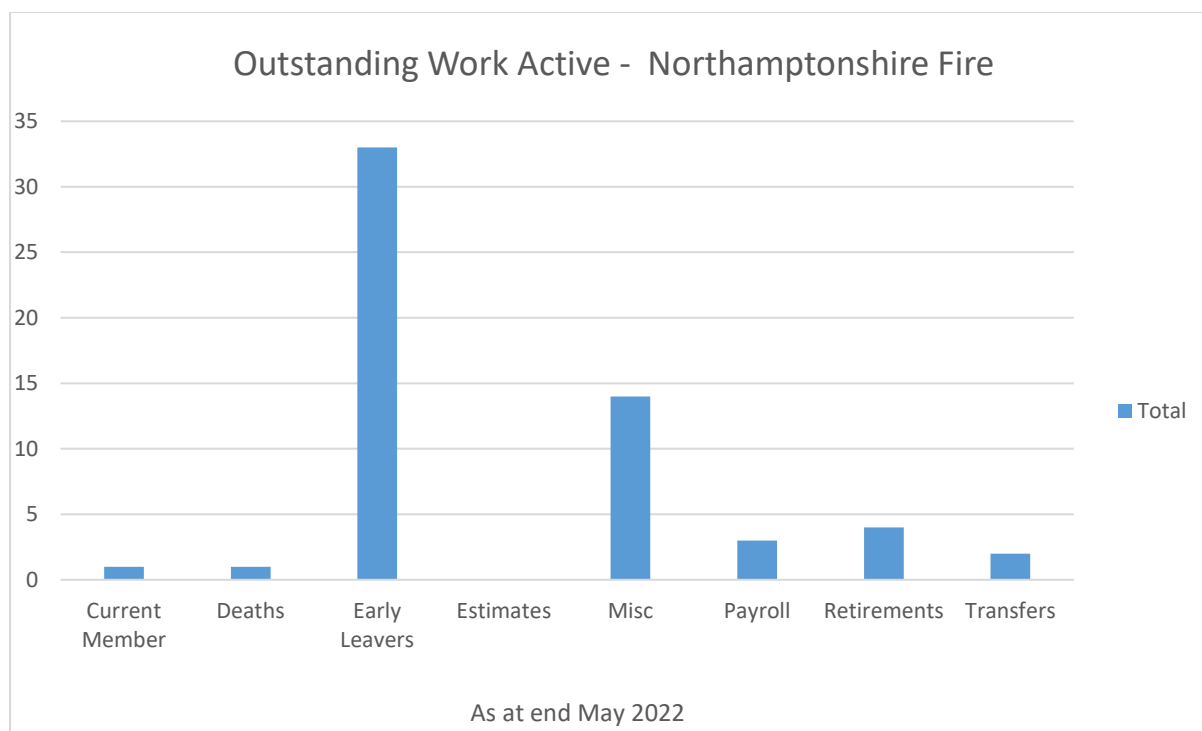
5.Key Performance Indicators

Completed processes

Northamptonshire Fire (1 to 31 May 2022)						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Transfer In Quote	1	10	0	85	0	34
Deferred Benefits Set Up on Leaving	1	10	0	85	0	17
Pension Estimate	2	10	2	85	100	1
Change of Address	7	20	7	85	100	1
General Payroll Changes	2	20	2	85	100	1
Enquiry Fire	1	10	1	85	100	5
Update Member Details	1	20	1	100	100	1
Monthly Pension	446	Pay date	446	100	100	



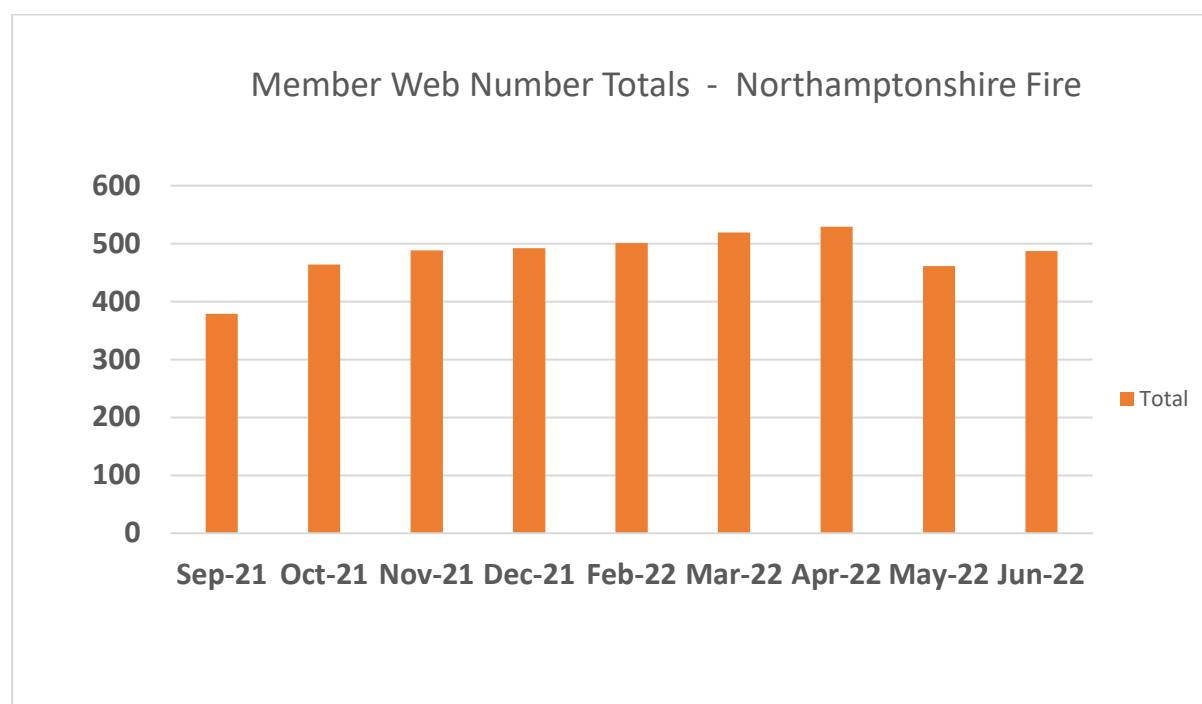
6.Work in Progress



7.Member Web Registrations

The number of members signed up to member web are:

Status	Number
Active	211
Pensioner	181
Pensioner Ex-Spouse	0
Beneficiary Pensioner	13
Deferred Ex-Spouse	0
Deferred	82

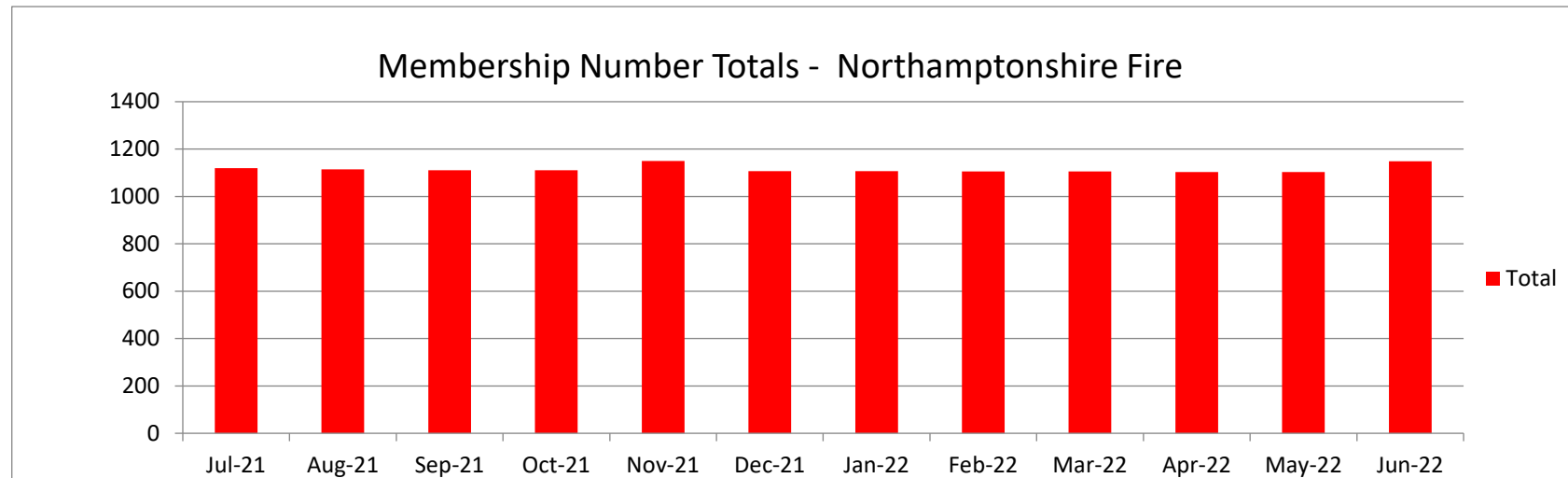


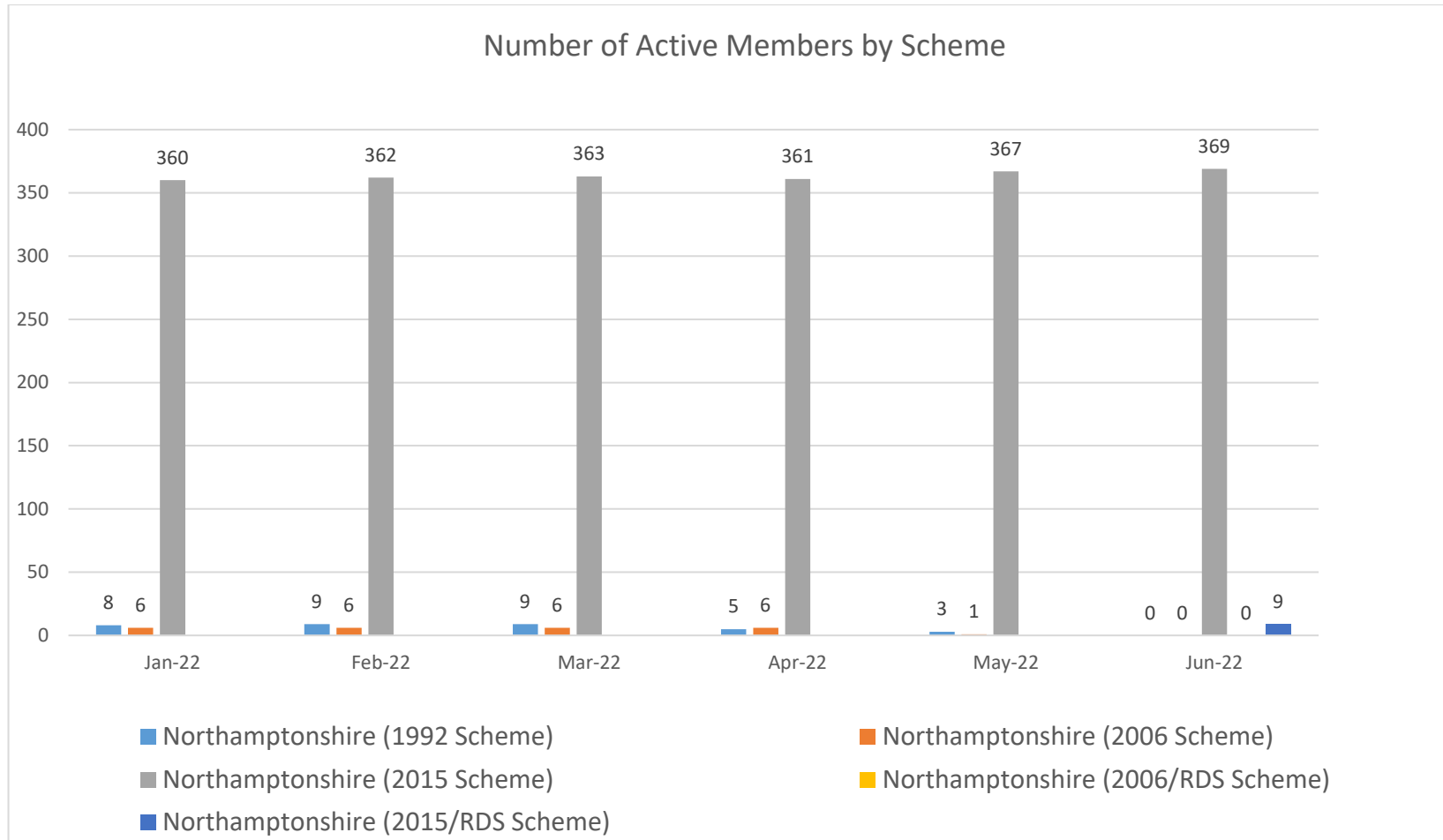
8. Calendar of Events

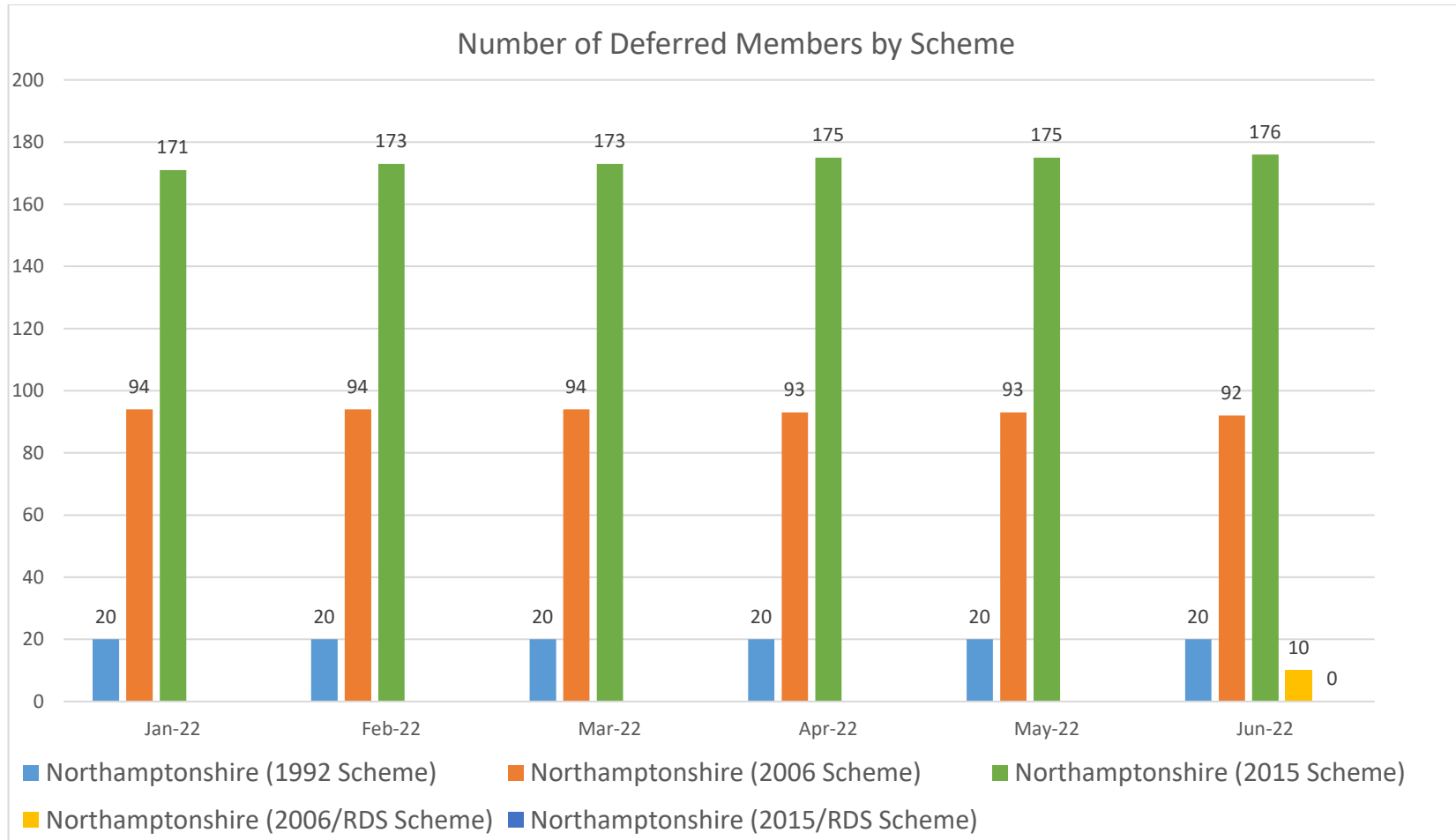
January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet?	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's Life Certificates Pensioner Newsletter
May	June	July	August
Roll out of Monthly Postings 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

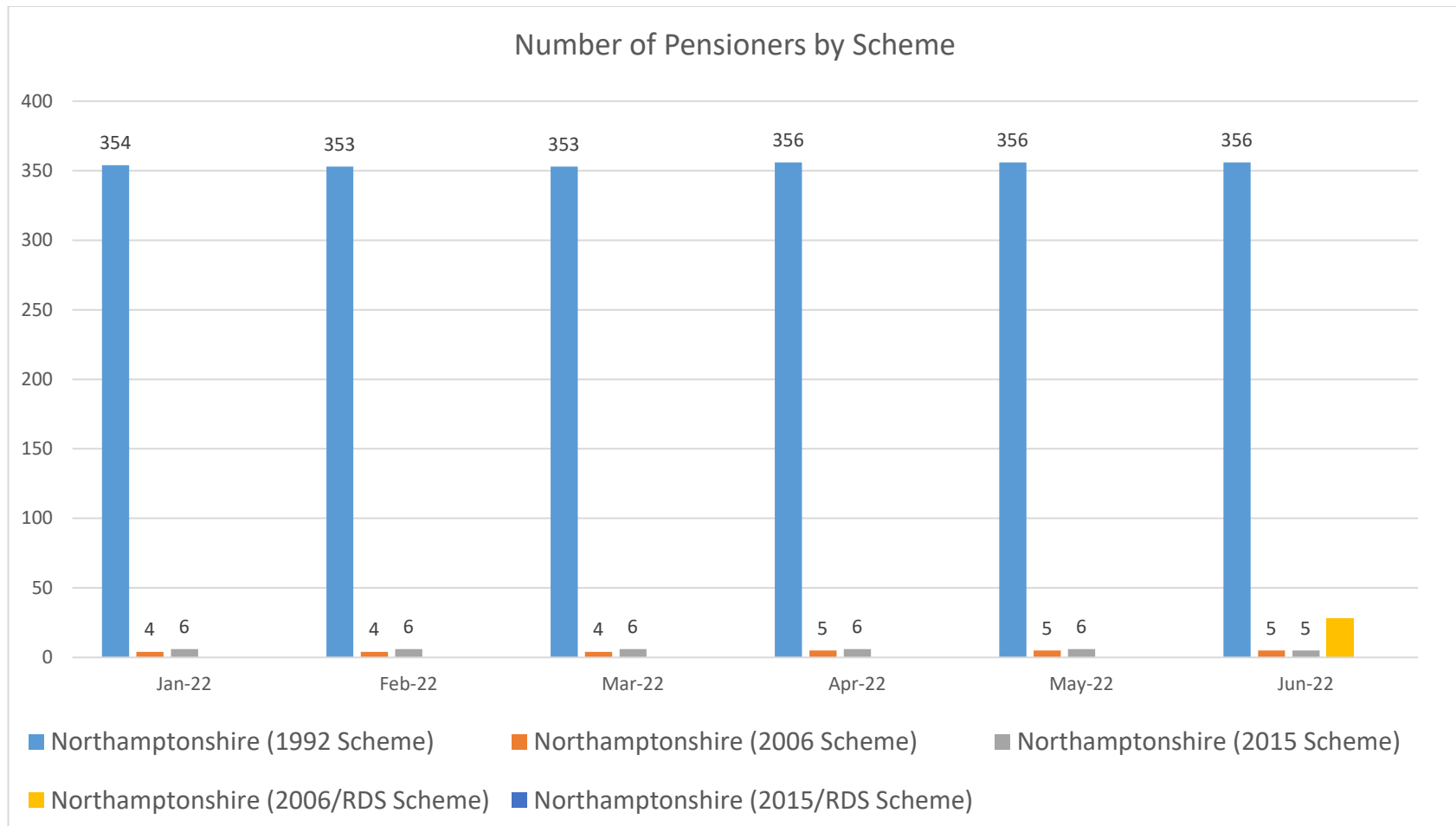
9.Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Northamptonshire (1992 Scheme)	0	20	356	55	0	0
Northamptonshire (2006 Scheme)	0	92	5	1	11	0
Northamptonshire (2006/RDS Scheme)	0	10	28	0	0	0
Northamptonshire (2015 Scheme)	369	176	5	0	4	7
Northamptonshire (2015/RDS Scheme)	9	0	0	0	0	0









10.Five Year Audit Plan 2019 – 2024

West Yorkshire Pension Fund Five Year Audit Plan 2019 - 2024	Frequency	Last Audit	Recommendations	Days	19/20	20/21	21/22	22/23	23/24	Total
Annual Accounts Verification	Annual	Jul 18	1	10	✓	✓	✓	✓	✓	
Audits Per Year					1	1	1	1	1	5
Benefits										
Local Government Scheme Contributions	2 Yearly	Nov 18	0	20			✓		✓	
New Pensions and Lump Sums - WYPF										
- Normal and Early Retirements	5 Yearly	Mar 15	0	25	✓					
- Death in Service, Post Retirement Widow and Dependent Benefits	5 Yearly	Mar 17	0	20			✓			
- Ill Health Pensions	5 Yearly	Oct 13	2	20					✓	
- Flexible Retirements	5 Yearly	Apr 16	1	20		✓				
- Deferred Pensions	5 Yearly	Mar 18	0	20				✓		
Transfers Out	3 Yearly	Nov 17	0	20		✓				
Transfers In	3 Yearly	Sep 16	2	20	✓		✓			
Reimbursement of Agency Payments	5 Yearly	Mar 18	2	15				✓		
Life Certificates	5 Yearly	Oct 15	0	15		✓				
AVC Arrangements	5 Yearly	Sep 17	0	15				✓		
Admission of New Bodies	5 Yearly	Jan 15	0	20	✓					
Pensioners Payroll	2.5 years	Mar 16	3	20		✓			✓	
Purchase of Additional Pension	5 Yearly	Mar 17	1	15			✓			
Annual Benefits Statements	2.5 years	Oct 16	0	20	✓			✓		
New Pensions and Lump Sums - Fire Service	3 Yearly	Jul 18	1	15		✓			✓	
Audits Per Year					4	5	4	4	4	21

11. 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	0
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	0
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

Monthly Report

July 2022

Northamptonshire Fire Authority



Prepared by:

Matt Mott

Governance and Business Development Manager

Mobile: 07815 476877

Email: matt.mott@wypf.org.uk

West Yorkshire Pension Fund

Aldermanbury House

4 Godwin Street

Bradford

BD1 2ST

www.wypf.org.uk

Follow WYPF on Twitter www.twitter.com/wypf_lgps

Follow WYPF on Facebook www.facebook.com/westyorkshirepensionfund



Contents

1 Regulations/Fire Scheme Update.....	4
2 Member Update	8
3 Administration Update.....	9
4 Communication & Training	9
5 IT Update	10
6 Key performance Indicators	11
7 Work in progress.....	12
8 Member web registrations.....	13
9 Calendar of Events	14
10 Membership Numbers	15
11 Five Year Audit Plan	19
12 Overriding Disclosure Time Limits.....	20

1.0 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 58 - June 2022 \(fpsregs.org\)](https://www.fpsregs.org/)

FPS

Home Office collection of FPS forecasts for 2022-23 to 2027-28

On 21 June 2022, the Home Office emailed all FRAs in England to request submission of their pension income/expenditure forecasts for the period 2022-23 to 2027-28.

The formal commissioning letter at [Appendix 1](#) sets out the centrally prescribed assumptions that must be applied when calculating pension income and expenditure forecasts. The forms can be accessed on DELTA from 1 July 2022.

The deadline for submissions is Friday 19 August 2022. FRAs are also required to complete the Excel table at [Appendix 2](#) in order to declare the local assumptions that they have applied to calculate their pension estimates. The prescribed assumptions that FRAs should use for CPI percentage increases, pay increases and employer contribution rates for the forecasting period have already been pre-populated on the table.

Please note that payment of the 2022 Top Up grant will be conditional on its completion and incomplete tables will be returned to FRAs.

For the avoidance of any confusion, there are **two returns required by 19 August 2022**:

1. The online DELTA returns setting out the 6-year forecast of pension income and expenditure.
2. Assumptions returns (email direct to anthony.mooney@homeoffice.gov.uk attaching the completed table above).

FRAs are reminded that forecast pension accounting data is being subjected to an ever-increasing scrutiny and, as such, they should ensure that processes are in place to ensure that they have a robust methodology to calculate these. [Best practice forecasting guidance](#) was published by the Pension Forecasting Working Group in July 2019.

Matthews – Lessons Learned

The Home Office has recently shared with us a [draft document which outlines the lessons learned](#) from the first special members' options exercise.

This high-level paper has been produced for stakeholders involved in Matthews Remedy work. The purpose of this paper is to identify the areas of improvement from the previous remedy project and how to implement the lessons identified. The lessons referenced are drawn from the experience and reflections of the Home Office, Government Actuary Department and Local Government Association on

Matthews Remedy options exercise which took place between April 2014 and September 2015.

Stakeholders had opportunity to discuss the key points from the paper at our latest [coffee afternoon session on 28 June 2022](#).

Feedback is welcomed from the sector as to whether anything is missing from the document which should have been captured. Please send any thoughts and suggestions through to the Bluelight inbox (bluelightpensions@local.gov.uk).

Immediate Detriment Framework costing and assumption guidance

On 26 May 2022, the LGA in collaboration with Ian Hayton, Cleveland FRS CFO and NFCC pensions lead, hosted a session via MS Teams relating to the Financial Assessment for Immediate Detriment. The session was open to all FRAs, and the invite was shared with CFOs.

The LGA has been working closely with Cleveland FRS to establish a calculator which should enable FRAs to estimate their financial liabilities when considering adoption of the Framework.

The session was designed to provide participants with an overview of the financial assumption spreadsheets. The LGA provided attendees with an explanation of the spreadsheets which included how each column interacts with the final data as well as a demonstration on how to complete the spreadsheet.

It was agreed at this meeting that the LGA would prepare some guidance for FRAs on how they can effectively use the spreadsheet. We are pleased to confirm that the guidance, along with template spreadsheets, has now been published and is available to access via the [age discrimination page in the member protected area](#) of the FPS Regulations and Guidance website.

Before using the spreadsheet, it is worth noting that it has been designed to provide FRAs with a basic estimate of their financial exposure; it does not cover every eventuality and it is based on the LGA's current understanding of what the main financial liabilities are.

Bluelight inbox and query form

Now that the Bluelight team is up to full strength please can we ask that all queries are sent to the generic Bluelight inbox (bluelightpensions@local.gov.uk). This will

enable the most appropriate team member to respond as well as ensuring that queries can be dealt with when someone is on leave.

In addition, please can we remind readers of the process to follow when submitting a technical query. [FPS Bulletin 9](#) confirmed that a query form had been developed which asks for information in the following areas:

- Details of your query
- Area of uncertainty / challenge
- Proposed solution
- Research undertaken: Relevant legislation, HMRC guidance, relevant websites, historical background (circulars or technical meeting minutes), legal advice [Include links]
- Indication of amounts (£) involved
- Timescales involved
- Other supporting evidence Receiving queries in this way allows us to build up a picture of frequently asked questions and ensure greater consistency in our responses.

We can build up a knowledge bank of resources and be able to more easily identify common areas of uncertainty, where dedicated training or workshops could be offered.

The form and notes for completion are available on the [technical queries page](#) of the FPS Regulations and Guidance website. Once completed, the form should be submitted to bluelight.pensions@local.gov.uk. Your query will be acknowledged upon receipt, and we will aim to reply to your query within 28 days. If we cannot reply with a full response within 28 days, we will let you know and tell you when you can expect to receive a full reply from us.

Please note that we have taken the opportunity to move the technical queries page to the password-protected area of the website, as it intended as a dedicated resource for practitioners. Therefore, you will now need to log in to access the form and the log of previous queries.

Annual Benefit Statements 2022 – Information factsheet

At the Fire Communications Working Group (FCWG) meeting on 13 June 2022 we discussed whether it would be beneficial to provide members who are affected by age discrimination remedy with any additional information alongside their annual benefit statement.

Although the notes clearly indicate that benefit statements cannot at this stage reflect remedy, the group thought that it would be prudent to provide members with an additional information note which outlines the timeframes associated with remedy.

The factsheet is available to access via the [guides and sample documents page](#) of the FPS Regulations and Guidance website, under the heading Annual Benefit Statements (ABS). All administrators are encouraged to send the document to members impacted by remedy, with the 2021/22 benefit statements.

FPS England SAB updates

SAB respond to HM Treasury's letter

We reported in [FPS Bulletin 52](#) that the chair of the SAB had written an [open letter to HM Treasury \(HMT\) on the withdrawal of the Home Office informal guidance](#) open letter to HM Treasury (HMT) on the withdrawal of the Home Office informal guidance on immediate detriment. The letter, dated 17 December 2021, asked for more information on the risks and uncertainties which HMT said arose as a result of processing cases ahead of legislation.

On 23 March 2022, [HMT provided a response outlining the factors behind the withdrawal](#) in more detail. The response highlighted that Section 61 of the Equality Act 2010 did not, in HMT's opinion, allow for amendment of a member's tax position. The response detailed several tax complexities which had been identified and will be dealt with through legislation.

On 20 June 2022, the chair of the SAB wrote [an open letter in response to HMT's reply](#) which seeks further clarity on the extent of Sections 61/ 62 and the tax implications detailed.

Other News and Updates

Further consultation on Pensions Dashboards launched

On 28 June 2022, DWP launched a further consultation on Pensions Dashboards: [Pensions dashboards: further consultation - GOV.UK](#) - (www.gov.uk)

This further consultation supplements the consultation on the draft dashboard regulations which ran from 31 January 2022 to 13 March 2022. More information, including the LGA FPS response to that consultation, can be found on the [consultations page](#) of www.fpsregs.org.

The further consultation sets out two proposals. The first proposal provides clarity on the 'Dashboard Available Point' (DAP). The second proposal allows the Money and Pensions Service and the Pensions Regulator to share information about dashboards with each other.

The DAP is the point at which dashboards will be available to all members of the public. The consultation proposes that the DWP will decide on the DAP and then give pension schemes 90 days' notice. It is hoped that this will give schemes sufficient time to make final preparations. The consultation is scheduled to run for 3 weeks and closes on 19 July 2022.

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.

The next session is due to take place on 12 July 2022.

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

[14 June 2022 – TPR Governance and Administration survey results 2020-21](#)

[28 June 2022 – Matthews - lessons learned](#)

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.

Legislation

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](#)

2. Member Update

None

3. Administration Update

Preparing for year-end

As we are now some time past March some clients have now submitted their month 12 file.

To date WYPF have only processed approximately half of clients as the data has been received late or not at all.

If you haven't submitted month 12 please do so as a matter of urgency or if you are experiencing issues this is delaying your return, please contact WYPF immediately.

Remember, month 12 posting is key to important statutory duties undertaken by WYPF (such as annual benefit statements and pension saving statements).

Annual benefit statements (ABS)

Development of this year's ABS and accompanying web notes has been a priority in June for WYPF.

Whilst further information on annual ABS will be provided over the coming weeks, we wanted to confirm that the recently produced LGA factsheet mentioned in bulletin 58 will be included with this year's ABS.

4. Communication & Training

Communications

The member pages of WYPF website (wypf.org.uk/firefighters) have been updated to reflect that active members are all now in the 2015 with effect from 1 April 2022.

Information about the legacy schemes has been reduced with signposting added pointing members back to the national site for information about 1992/2006 schemes: www.wypf.org.uk/firefighters/legacy-fire-pension-schemes/

The Fire client satisfaction survey was released during June and closes on Friday 8 July. Responses have to date been on the low side. It only takes a few minutes to complete, so please answer the survey and provide feedback on our service.

Member survey launched about WYPF websites and the My Pension portal. To achieve accuracy and impartiality an independent consultancy which specialises in this work, TLF Research, have been appointed to carry out the survey on our behalf.

The survey was launched in June and closes on Sunday 10 July and to date we've had over 3,500 responses across LGPS and Fire members.

Pre-retirement seminars attended by WYPF during June:

7 June – WY FRA

13 June – Fire Comms Group

14 June – Staffs FRA

Pension boards

6 June – Lincs Pension Board (am) and Warwickshire Pension Board (pm)

22 June – Devon & Somerset Pension Board

National meetings

1 June – LGA in-person training with Team fire (worth mentioning perhaps)

23 & 24 June – Fire SAB meetings

FRA training delivered by WYPF: None

5. IT Update

KPI Reporting

All FRAs should have received a letter informing them about revised KPI reporting.

IT have developed a revised suite of KPI reports which measure the member's end to end experience. These KPIs are being reviewed and analysed over the course of the summer with an intention to include in the monthly client report with effect from the autumn.

BREAKING News

On the 6 July it was announced the Fire Brigades Union (FBU) & British Medical Association (BMA) have been granted permission for a high Court Judicial Review against pensions proposals that would see younger members foot the bill for changes linked to the McCloud ruling.

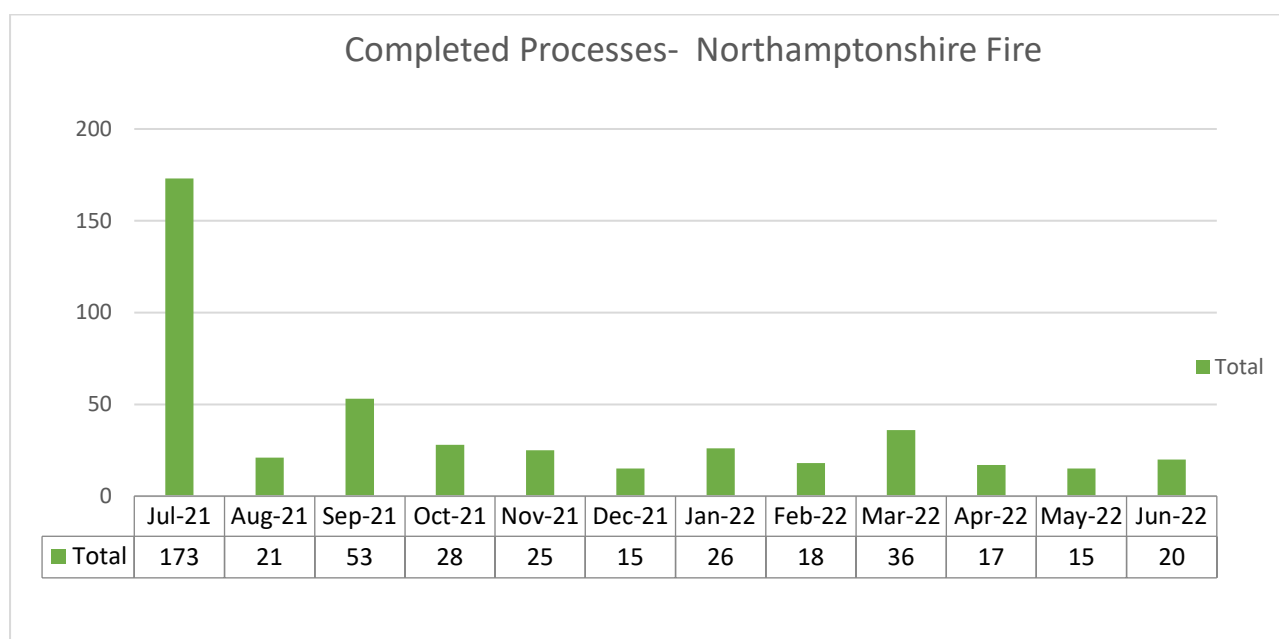
The two unions filed separate challenges to the government's proposals, but their claims will be heard together because they overlap.

FBU believe the cost should be funded by the Treasury and, if successful, could also have repercussions for other Public Service Pension Schemes.

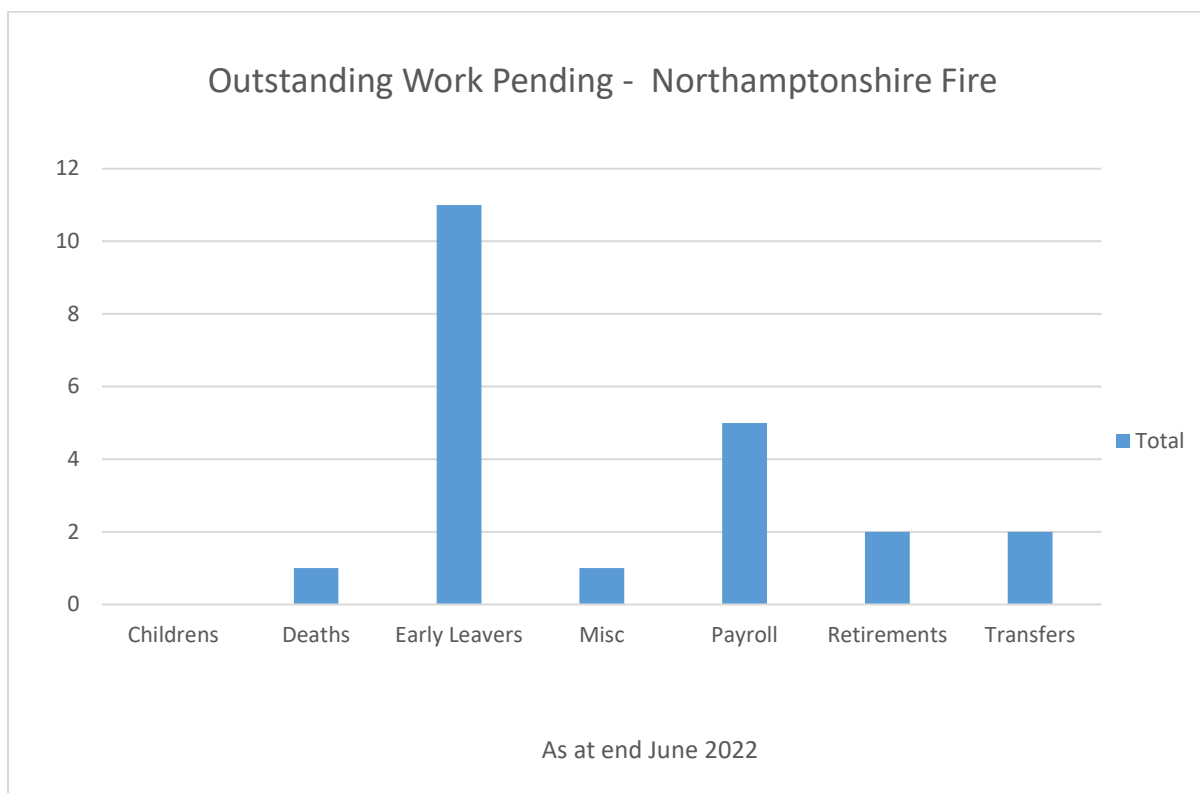
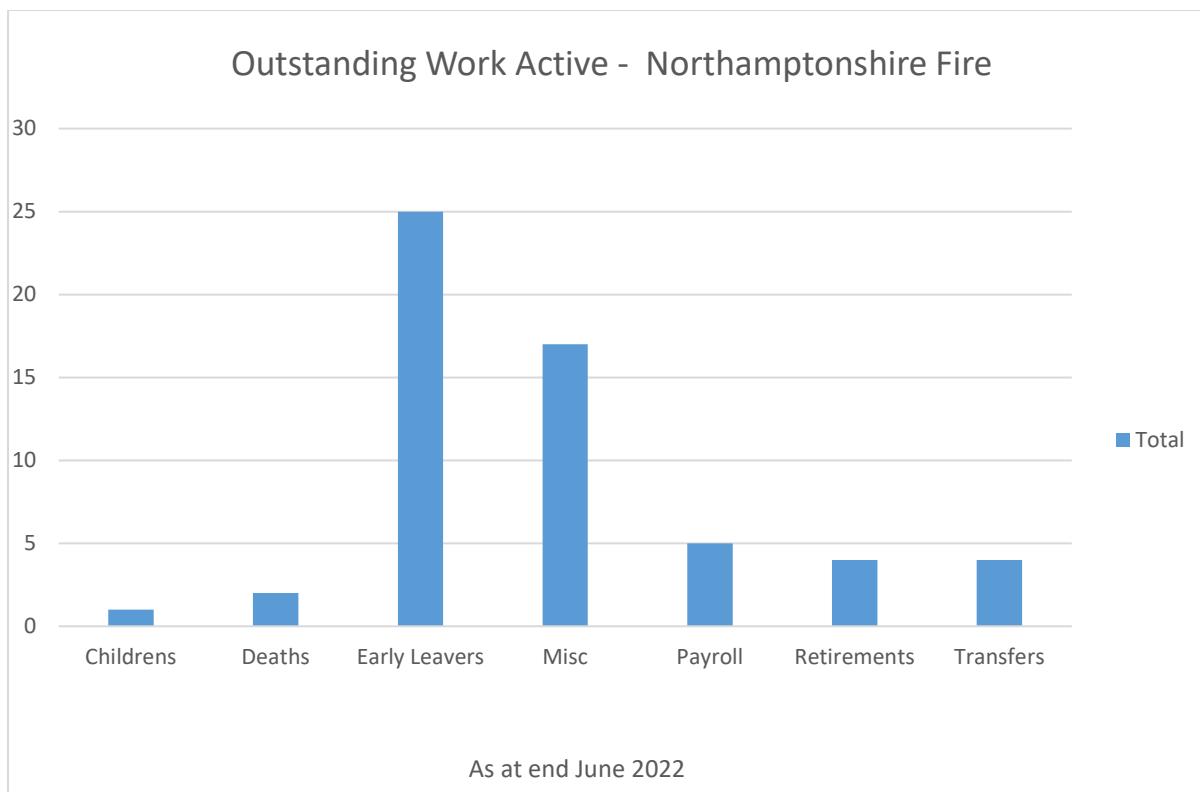
6.Key Performance Indicators

Completed processes

Northamptonshire Fire (1 to 30 June 2022)						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Transfer In Quote	2	10	1	85	50	7
Transfer In Actual	1	10	1	85	100	4
Divorce Settlement/Pension Sharing order Implemented	1	80	1	100	100	22
Deferred Benefits Set Up on Leaving	2	10	1	85	50	35.5
Pension Estimate	1	10	1	85	100	1
Change of Address	4	20	3	85	75	10
General Payroll Changes	4	20	4	85	100	1
Enquiry Fire	1	10	1	85	100	1
Death in Retirement	1	5	1	85	100	1
Update Member Details	1	20	1	100	100	1
Initial letter Death in Retirement	1	10	1	85	100	1
Monthly Pension	446	Pay date	446	100	100	



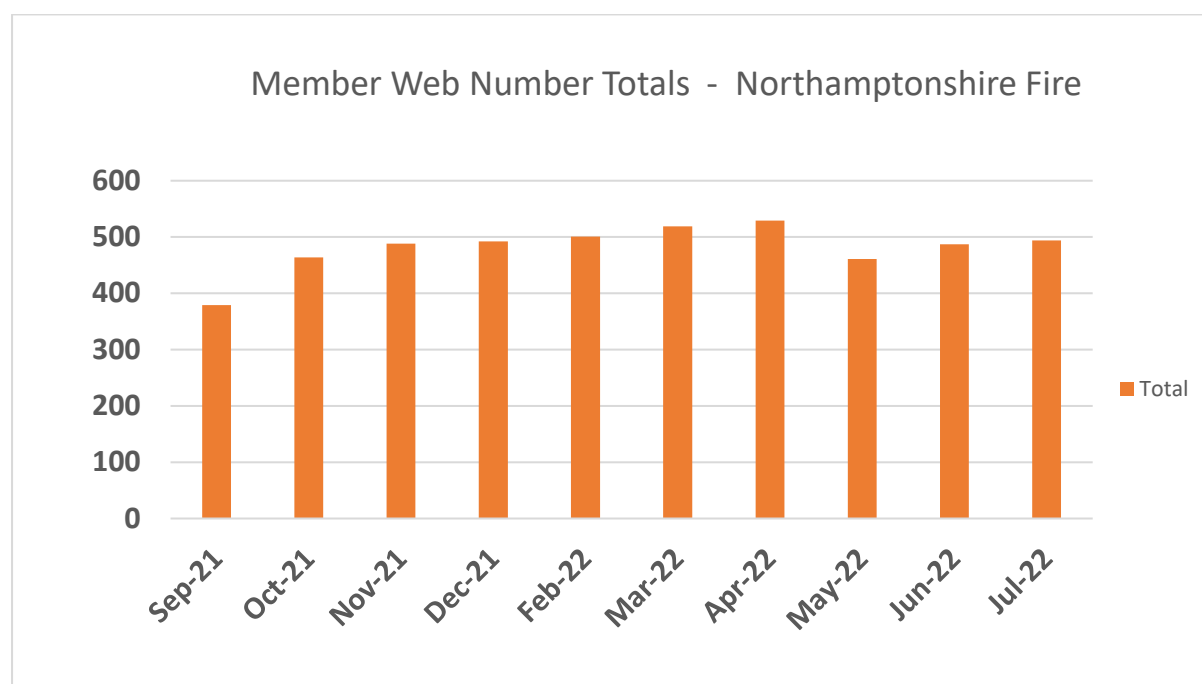
7. Work in Progress



8.Member Web Registrations

The number of members signed up to member web are:

Status	Number
Active	212
Pensioner	186
Pensioner Ex-Spouse	0
Beneficiary Pensioner	13
Deferred Ex-Spouse	0
Deferred	83

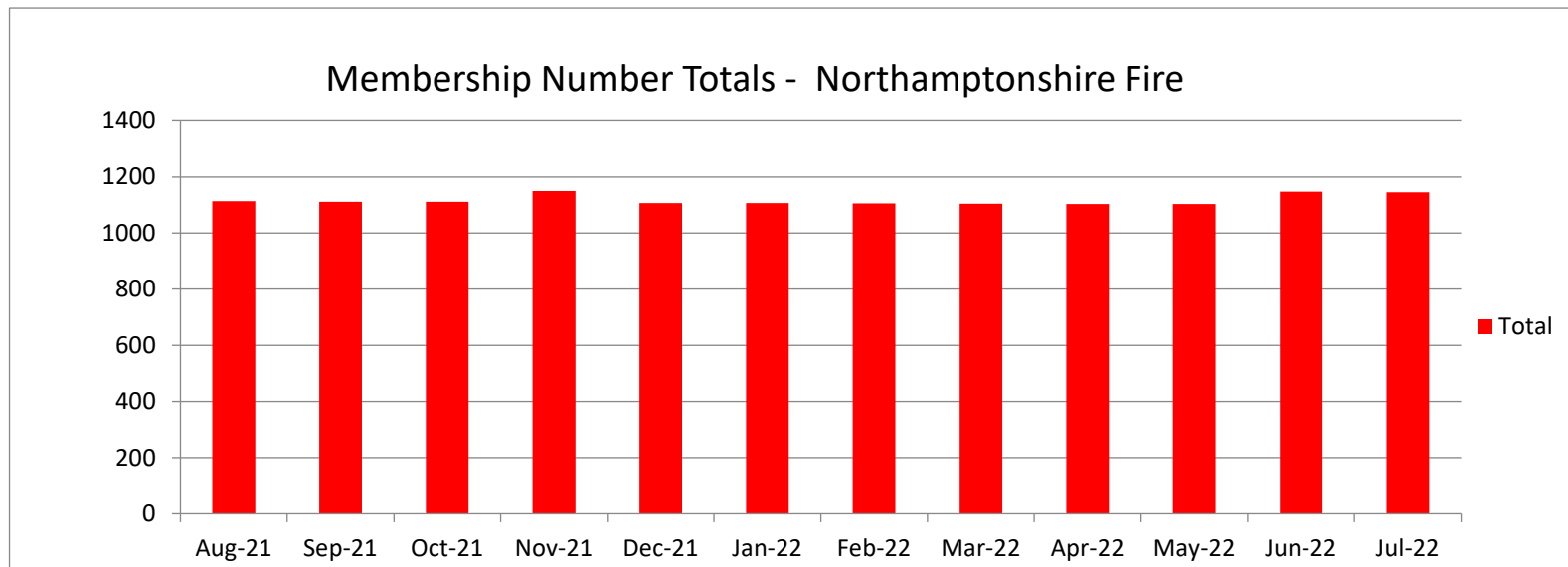


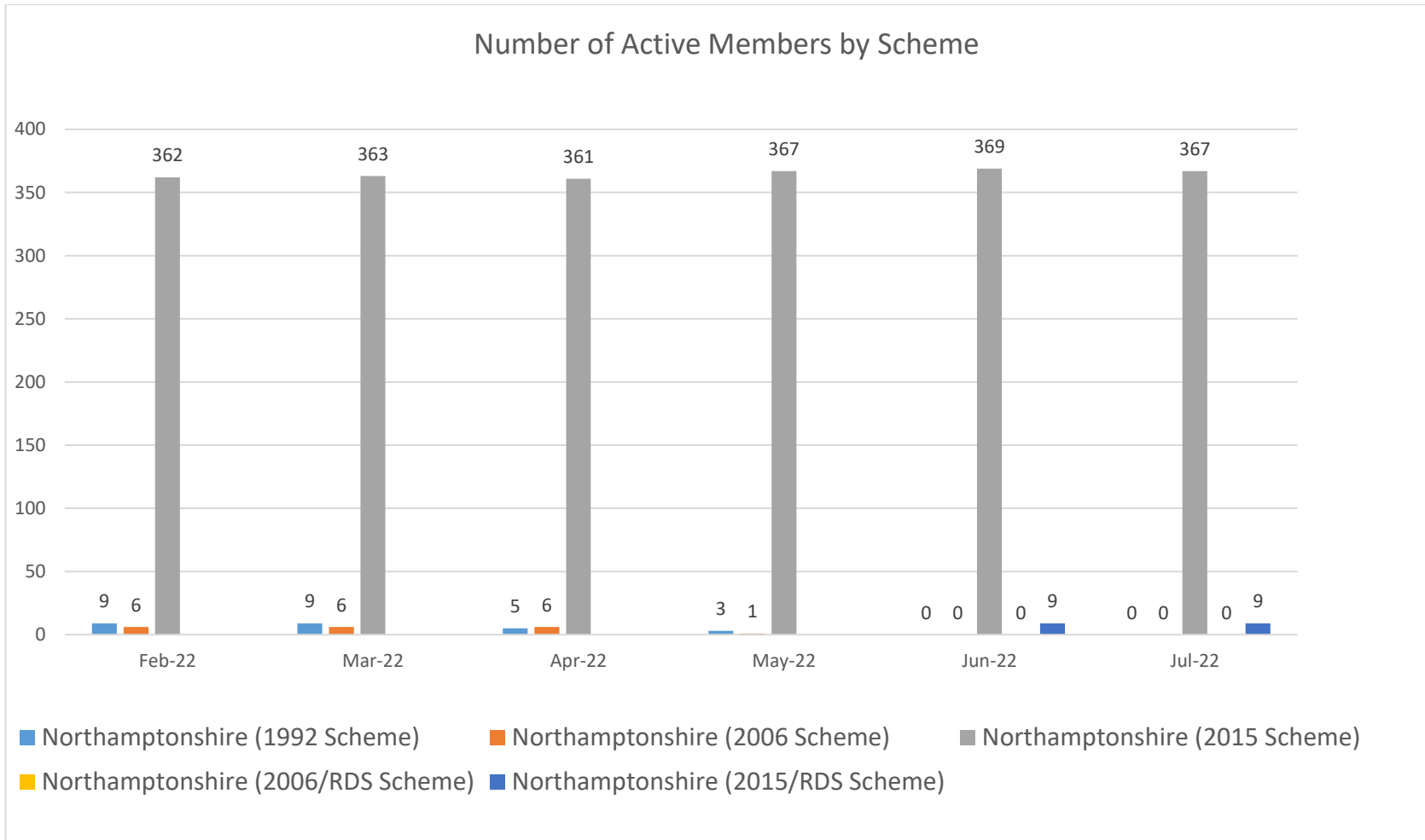
9. Calendar of Events

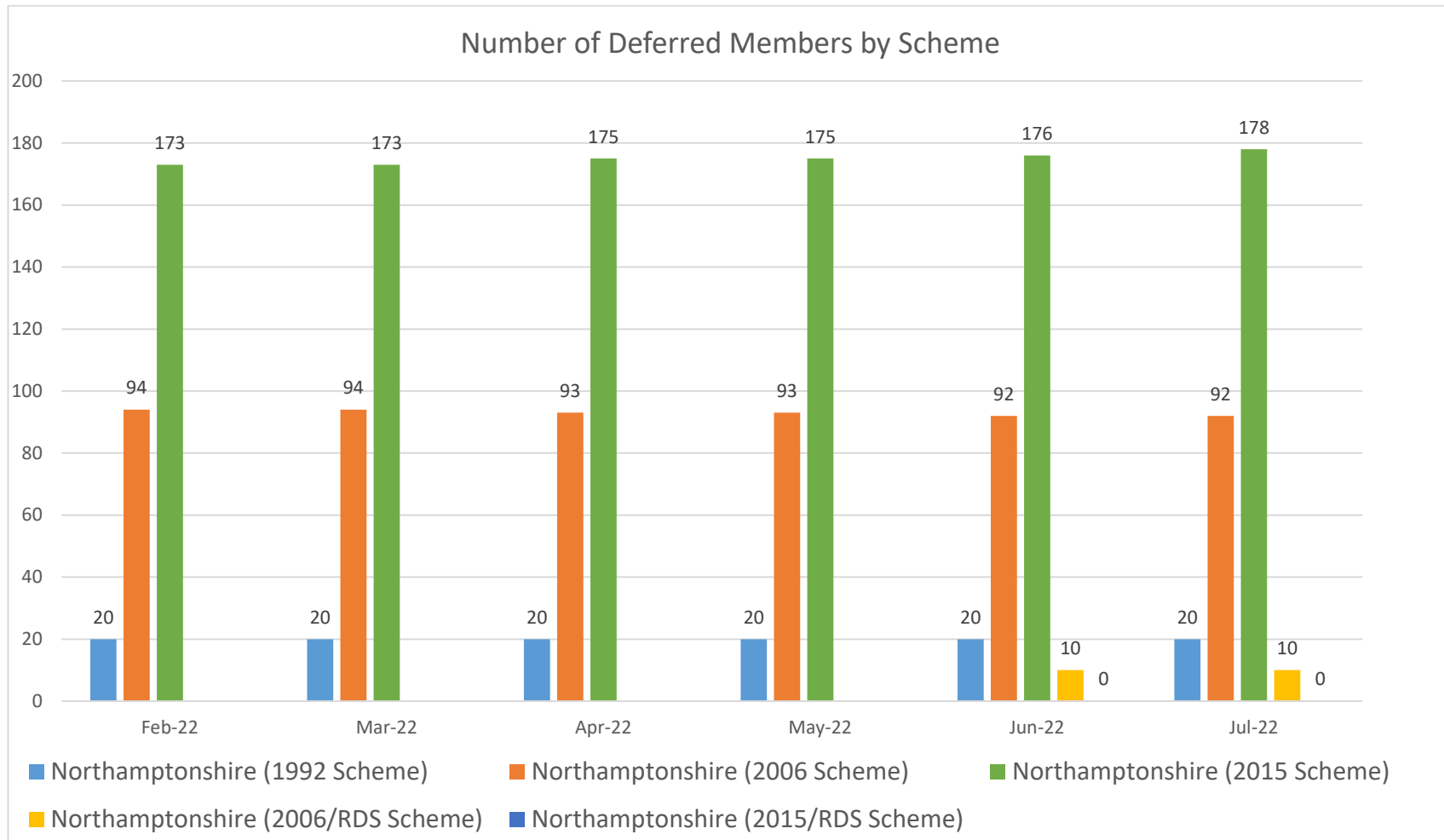
January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet?	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's Life Certificates Pensioner Newsletter
May	June	July	August
Roll out of Monthly Postings 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

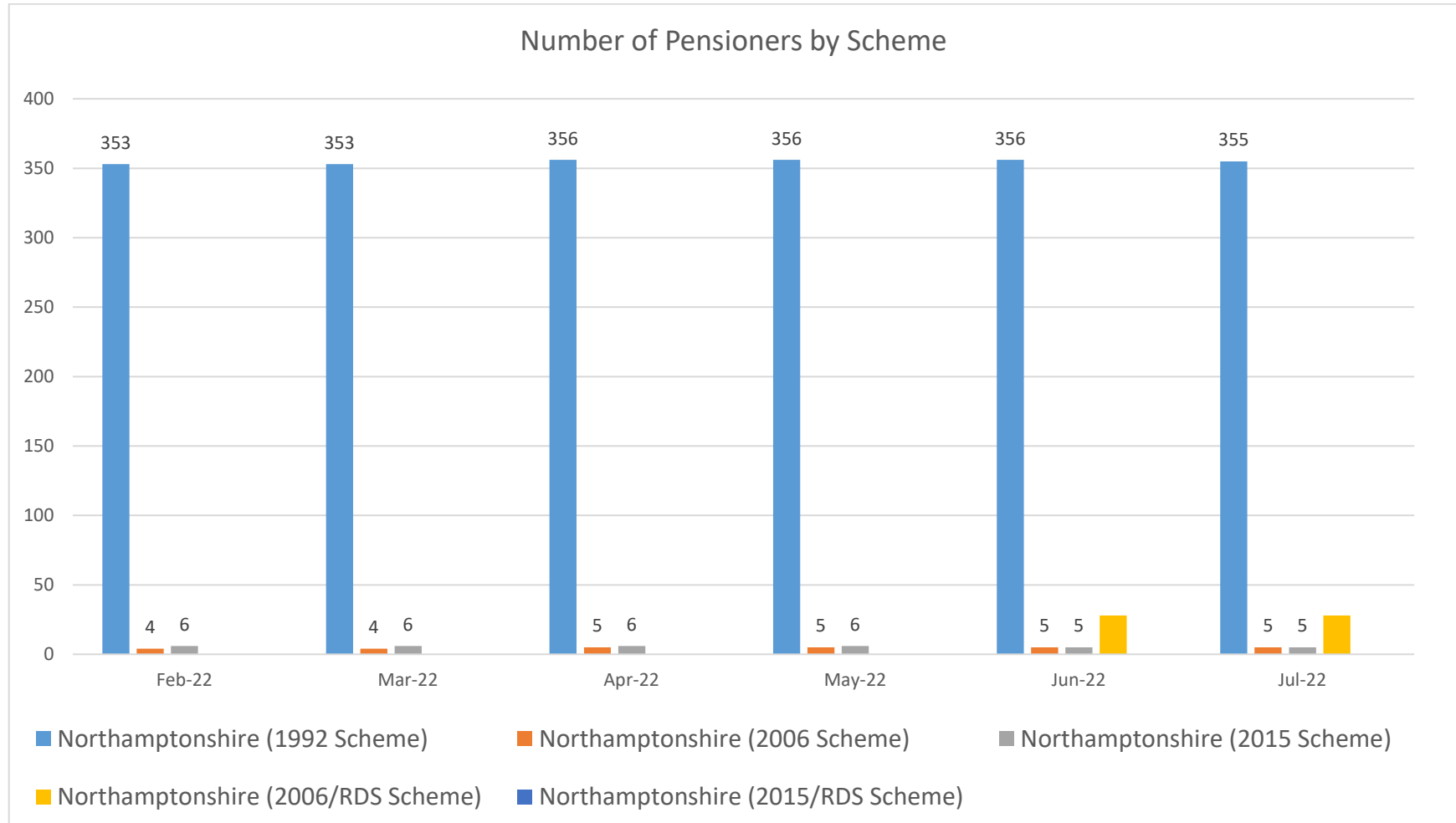
10.Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Northamptonshire (1992 Scheme)	0	20	355	53	0	0
Northamptonshire (2006 Scheme)	0	92	5	1	11	0
Northamptonshire (2006/RDS Scheme)	0	10	28	0	0	0
Northamptonshire (2015 Scheme)	367	178	5	0	4	7
Northamptonshire (2015/RDS Scheme)	9	0	0	0	0	0









11. Five Year Audit Plan 2019 – 2024

West Yorkshire Pension Fund Five Year Audit Plan 2019 - 2024	Frequency	Last Audit	Recommendations	Days	19/20	20/21	21/22	22/23	23/24	Total
Annual Accounts Verification	Annual	Jul 18	1	10	✓	✓	✓	✓	✓	
Audits Per Year					1	1	1	1	1	5
Benefits										
Local Government Scheme Contributions	2 Yearly	Nov 18	0	20			✓		✓	
New Pensions and Lump Sums - WYPF										
- Normal and Early Retirements	5 Yearly	Mar 15	0	25	✓					
- Death in Service, Post Retirement Widow and Dependent Benefits	5 Yearly	Mar 17	0	20			✓			
- Ill Health Pensions	5 Yearly	Oct 13	2	20					✓	
- Flexible Retirements	5 Yearly	Apr 16	1	20		✓				
- Deferred Pensions	5 Yearly	Mar 18	0	20				✓		
Transfers Out	3 Yearly	Nov 17	0	20		✓				
Transfers In	3 Yearly	Sep 16	2	20	✓		✓			
Reimbursement of Agency Payments	5 Yearly	Mar 18	2	15				✓		
Life Certificates	5 Yearly	Oct 15	0	15		✓				
AVC Arrangements	5 Yearly	Sep 17	0	15				✓		
Admission of New Bodies	5 Yearly	Jan 15	0	20	✓					
Pensioners Payroll	2.5 years	Mar 16	3	20		✓			✓	
Purchase of Additional Pension	5 Yearly	Mar 17	1	15			✓			
Annual Benefits Statements	2.5 years	Oct 16	0	20	✓			✓		
New Pensions and Lump Sums - Fire Service	3 Yearly	Jul 18	1	15		✓			✓	
Audits Per Year					4	5	4	4	4	21

12. 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	0
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	0
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



FPS Bulletin 56 – April 2022

Welcome to issue 56 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.

Contents

Calendar of events	2
Actions arising	3
FPS	3
Matthews – Second options exercise	3
Payroll workshop	4
FRA pension contacts	5
Technical query log	6
FPS England SAB updates	6
Member benefit illustrations	6
SAB respond to Home Office consultation response on prospective remedy	6
Other News and Updates	7
Appointment to the Bluelight Team	7
Vacancy at Mid and West Wales Fire and Rescue Service	7
TPO – Early resolution factsheet updated	8
TPO News – March 2022	8
Combatting pension scams	8
Annual allowance changes	9
PASA publishes fraud guidance on pre-employment vetting	13
PDP progress update report published	14

HMRC	14
Managing pension schemes service newsletter – April 2022	14
Guaranteed Minimum Pension (GMP) equalisation newsletter – April 2022	15
Events	15
FPS coffee mornings	15
FPS AGM – London – 25 and 26 October 2022 (save the date(s))	15
CIPFA annual conference for Pension Board members	16
Useful links	18
Contact details	18
Copyright	19
Disclaimer	19

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	3, 17, and 31 May 2022
North-East regional group	18 May 2022
CIPFA Pension Board training event	18 May 2022
South-West & Wales regional group	19 May 2022
Fire Communications Working Group	13 June 2022
SAB	23 June 2022
Midlands regional group	27 June 2022
FPS Technical Group	18 July 2022

Event	Date
SAB	8 September 2022
FPS AGM (Save the date)	25 and 26 October 2022
SAB	8 December 2022

Actions arising

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

[Matthews – Second options exercise](#): FRAs to complete data request questionnaire by 30 June 2022.

[Payroll workshop](#): FRAs to register their interest by 13 May 2022.

[FRA Pension Contacts](#): FRAs to provide LGA with information on who should receive generic pension information by 31 May 2022.

FPS

Matthews – Second options exercise

In [FPS Bulletin 55 – March 2022](#) readers were informed on the progress of the second options exercise for retained firefighters.

An action arising was for FRAs to identify any retained firefighters who have transferred from retained to wholetime employment and maybe subject to aggregation. Since publication, we have met with colleagues from the Home Office and Government Actuary's Department (GAD), and it has become apparent through our discussions that additional data is required.

On 14 April 2022, an email was sent to lead FRA contacts asking for them to complete a short questionnaire which sets out what data is required and the purpose of the data.

As we are now asking for additional data, we feel that it is appropriate to extend the deadline from 31 May 2022 by an additional month to **30 June 2022**. We appreciate that this is a significant ask and understand that FRAs may be focused on other areas, such as age discrimination remedy, however, we would not request this information if it was not vitally important.

ACTION: FRAs to complete data request questionnaire by 30 June 2022.

Payroll workshop

We were pleased to hear that, as we have now passed 1 April 2022, some FRAs have now shifted their attention to the data collection work needed for retrospective remedy. While this position is correct for many, we are aware that some FRAs haven't started this work yet. We have received feedback that this is primarily down to lack of confidence in the subject area.

Readers should be aware that there is a suite of tools available at their disposal to help with the data collection work. As well as providing a [remedy data collection guidance document](#), you also have access to a [blank remedy data collection template](#) and [remedy data collection template note for completion](#). These documents are freely accessible on the [FPS Regs and Guidance Website](#) and are stored under the [Implementation section of the Age discrimination remedy page](#).

While we appreciate that there is a relative amount of guidance out there, we are conscious that some people feel more comfortable discussing things as a group, rather than tackling them alone. We are therefore proposing to host a workshop which will be aimed at individuals within FRAs who have some form of responsibility over the data collection extract. We are labelling this as a payroll workshop; however, it will be your opportunity to raise any questions you may have in relation to the data extraction.

If this is something that you feel you and your FRA would benefit from, then please email bluelightpensions@local.gov.uk confirming the name of your FRA and who should be included on the invite.

In addition to the above, we are seeking volunteers from FRAs to give the group some feedback on their initial experiences with the data collection work. If this is something you would feel comfortable doing, then again please drop an email to bluelightpensions@local.gov.uk. Any help and support from the sector is much appreciated.

Although we don't have a fixed date yet, we would ideally like to do this before the end of May. Please can we therefore request that all expressions of interest are submitted by Friday 13 May.

ACTION: FRAs to register interest in workshop event by 13 May 2022.

FRA pension contacts

Following feedback we have received from colleagues, we understand that not all of our messages are shared as intended within an organisation. We would therefore like to know who at your FRA needs to be sent information on generic pension related matters.

As a minimum we would like to include the Scheme Manager and at least one person who has day to day responsibility for pensions.

Please can you therefore provide the name and email address for your FRA's Scheme Manager and confirm names and email addresses for anyone else who needs to be included in our communications. We are happy to send communications to generic pension inboxes if this is your preferred method of communication.

Please send this information no later than **31 May 2022** by email to bluelightpensions@local.gov.uk.

ACTION: FRAs to provide LGA with information on who should receive generic pension information by 31 May 2022.

Technical query log

The current [log of queries and responses](#) is available on 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.

No new queries have been added this month.

FPS England SAB updates

Member benefit illustrations

Friday 1 April 2022 saw the first major milestone in age discrimination remedy (McCloud/ Sargeant or the 2015 Remedy) for the Firefighters' Pension Schemes, with the two final salary schemes being closed to future pension build-up and all members building up benefits in the reformed CARE scheme from that point.

To coincide with this and to provide members with a better understanding of the implications of remedy on their benefits, the Firefighters' Pensions (England) Scheme Advisory Board (SAB) worked with Barnett Waddingham to produce a [suite of illustrative member scenarios](#).

The illustrations are based on different scheme memberships, scenarios and salary profiles, with benefits shown at a range of key retirement milestones.

The member benefit illustrations follow the ["Your questions answered" fact checker](#) produced in February 2022 which aims to answer some recurring questions that members have about the 2015 Remedy.

SAB respond to Home Office consultation response on prospective remedy

On 20 April 2022, the SAB submitted a letter to the Home Office acknowledging the consultation response on regulation amendments to deliver prospective remedy for the FPS.

The SAB noted the response and welcomed the opportunity to engage further with the Home Office on issues falling outside the scope of the consultation, such as the ill-health process and early retirement factors for the FPS 2006. A full summary of

[Click here to return to Contents](#)

the Board's discussion will be available in the meeting minutes of 24 March 2022, when published.

The SAB registered concern about the significant workload that implementation of Sargeant and Matthews within the required timescales will place on the Fire sector. The SAB felt that some smaller FRAs may be disproportionately impacted due to limited resource. The SAB also expressed concern about the likely requirement to comply with pensions dashboard regulations within a similar timeframe.

Other News and Updates

Appointment to the Bluelight Team

Following a successful recruitment campaign, we are delighted to announce that Elena Johnson has been appointed to the Bluelight Team in the role of Firefighters' Pensions Adviser (Governance) and will join the LGA on 16 May 2022.

Elena has 22 years' public service pension experience, in the LGPS and Firefighters' Pension Schemes. Elena commenced Local Government employment in January 2000 at Leicestershire County Council and currently works as a Pensions Team Manager there.

Elena's role will involve providing high-quality support to the Scheme Advisory Board (SAB) and FRA Local Pension Boards. Additionally, she will assist with priority developments in scheme governance.

Vacancy at Mid and West Wales Fire and Rescue Service

Please find below details of a current vacancy for Pensions Officer which is open to existing Mid and West Wales FRS employees and external applicants. The closing date for receipt of application forms is 16:30 on 9 May 2022.

The full details of the role and application form can be found on the [Current Vacancies](#) page of the Mid and West Wales FRS website.

TPO – Early resolution factsheet updated

On 30 March 2022, The Pensions Ombudsman (TPO) published an updated version of its [factsheet on the Early Resolution Service](#).

The factsheet provides guidance to members on the Early Resolution Service. This includes explaining what it is, how it operates and what options parties to a complaint have.

TPO News – March 2022

On 31 March 2022, [the Pensions Ombudsman \(TPO\) published its March news](#). The news includes articles on:

- webinars taking place in May and June
- the recently updated factsheet on the Early Resolution Service
- new legal determinations

Combatting pension scams

Too few pension scheme trustees are protecting savers by reporting suspected scams, says The Pensions Regulator (TPR).

In November 2020, TPR launched its [Pledge to Combat Pension Scams](#), which encourages schemes to do more to protect savers from scammers, including reporting suspected scams to the authorities – Action Fraud or by calling 101 in Scotland.

So far, over 400 schemes have pledged or self-certified they meet the campaign’s saver-protecting principles covering an estimated 16 million pension pots.

But TPR says more must be done on reporting and every administrator, trustee and provider should take responsibility for protecting savers and join the Pledge.

Nicola Parish, TPR’s Executive Director of Frontline Regulation said: “Scammers screw up lives and industry must stand up and do all it can to protect savers from these life-shattering crimes by joining our pledge campaign and reporting any suspected scams.

“New regulations have already introduced new duties on due diligence and warning members where a transfer shows features of a scam, so there’s no excuse for failing to report suspicions to the authorities”

TPR recently hosted a webinar giving:

- details of the evolving pension scams landscape
- information to support new duties to look for red and amber flags
- details about the pledge to combat pension scams
- updates from the Pension Scams Industry Group.

TPR has published [a recording of the pension scams webinar](#) on their website.

Annual allowance changes

The Government has changed the annual allowance rules. This has been done by section 9 of the [Finance Act 2022](#) and the [Registered Pension Schemes \(Miscellaneous Amendments\) Regulations 2022](#).

The changes apply in certain situations where annual allowance calculations for previous years are retrospectively amended.

The following is the LGA’s interpretation of the changes, which we emailed to lead FRA contacts on 5 April 2022. We thank our colleagues on the LGPS team for sharing this information with us.

Step 1: An employer becomes aware that information previously given was insufficient

The new regulations require employers to provide further information to administrators. This will apply where an employer becomes aware that information they provided previously, for a Pension Input Period (PIP) falling within the ‘relevant time’, was insufficient to enable the authority to correctly calculate the annual allowance.

The 'relevant time' begins with the start of the tax year six years before the 'current tax year' and ends with the end of the 'current tax year'. The 'current tax year' means the tax year in which the employer became so aware. So, if this happens in tax year 2022/23, the following PIPs will fall within the relevant time:

- 6 April 2022 to 5 April 2023
- 6 April 2021 to 5 April 2022
- 6 April 2020 to 5 April 2021
- 6 April 2019 to 5 April 2020
- 6 April 2018 to 5 April 2019
- 6 April 2017 to 5 April 2018
- 6 April 2016 to 5 April 2017

The employer must provide the further information within three months of becoming aware the information was insufficient or, if later, on or before 6 July following the end of the relevant PIP. The further information must enable the administrators to correctly recalculate the annual allowance.

Note: Employers must continue to provide administrators with any other changes that arise either outside of the relevant time or that do not affect the calculation of the annual allowance.

Step 2: The administrator must recalculate the annual allowance for the relevant PIP

If the administrator receives the further information from the employer for a PIP falling within the 'relevant time', it must recalculate the annual allowance. The 'relevant time' for this begins with the start of the tax year six years before the 'current tax year' and ends with the end of the 'current tax year'. The 'current tax year' for this purpose means the tax year in which the authority received the further information.

Administrators must also recalculate annual allowance amounts where there has been a change to the scheme rules. This will apply if the change results in a change to an annual allowance calculation for a PIP falling within the 'relevant time'. The 'relevant time' begins with the start of the tax year six years before the 'current tax year' and ends with the end of the 'current tax year'. The 'current tax year' for this purpose means the tax year in which the rule change is made.

After recalculating the annual allowance, if the member:

- exceeds the annual allowance for the relevant tax year - the administrator must send a pension savings statement to the member. It must send this within three months of receiving the further information/the rule change being made or, if later, by the 6 October following the end of the relevant tax year. They must also send an event report telling 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 report relates. It is not relevant whether the administrator had previously sent a pension saving statement for this period.
- does not exceed the annual allowance for the relevant tax year and the administrator has previously sent a pension savings statement for that period, it must send an updated statement. It must send this within three months of receiving the further information/the rule change being made, or, if later, by the 6 October following the end of the relevant tax year.

Deadline to make or amend mandatory scheme pay elections extended

Members must give mandatory scheme pays elections by no later than 31 July in the year following that in which the 'relevant tax year' ends. 'Relevant tax year' means the tax year the member exceeded the annual allowance.

However, for members who received a pension savings statement as a result of a recalculation under step 2, this deadline will likely have expired. For these cases, section 9 of the Finance Act 2022 extends the deadline if:

- the administrator gave the statement within the 'relevant time', and
- as a result of that statement, the member qualifies to elect for mandatory scheme pays.

'Relevant time' means a time falling:

- on or after 2 May in the year following the end of the relevant tax year, and
- before the end of the six-year period beginning with the end of the relevant tax year.

Where this applies, the member must instead give their election for mandatory scheme pays before:

- the end of the three-month period beginning with the day on which the administering authority gave the pension savings statement, or if earlier
- the end of the six-year period beginning with the end of the relevant tax year.

Though the 31 July deadline is extended in these cases, members remain unable to give a mandatory scheme pays election once they are entitled to payment of all their benefits under the scheme or, if earlier, once they have reached age 75.

The mandatory scheme pays deadline is not extended for members who previously qualified to elect for mandatory scheme pays in respect of the relevant tax year but chose not to. If the member did elect for mandatory scheme pays, the member will need to amend their initial election based on the recalculated amounts.

The new regulations have also changed the time limit for amending mandatory scheme pays elections. The time limit is set out in Regulation 4 of the Registered Pension Schemes (Notice of Joint Liability for the Annual Allowance Charge) Regulations 2011. Before, members had until the 31 July following the end of the four-year period beginning with the last day of the relevant tax year to amend an

election. With effect from 6 April 2022, this has been extended by two years. So, if a member exceeded the annual allowance in tax year 2019/20, the new deadline for giving the amended notice is 31 July 2026. The deadline was previously 31 July 2024.

Deadline for administrators to pay annual allowance charge to HMRC extended

Administrators must report and pay annual allowance charges to HMRC using Accounting for Tax (AFT) returns. Administrators must use the return for October to December in the year following that in which the tax year ends. Though, it can choose to use a return for an earlier period.

However, where the member makes a mandatory scheme pays election by the extended deadline, the deadline will likely have expired.

For these cases, section 9 of the Finance Act 2022 extends the deadline. Where members elect for mandatory scheme pays after 30 September in the year following that in which the relevant tax year ends, the administrator must report and pay the tax using the AFT return for the three-month period following the three-month period in which it receives the mandatory scheme pays election. Though it can choose to use the return for the period in which it received the election.

PASA publishes fraud guidance on pre-employment vetting

On 19 April 2022, the Pensions Administration Standards Association (PASA) published [fraud guidance on vetting new employees](#).

PASA has been made aware of cases of fraud undertaken or assisted by pension administration employees. In some cases, individuals deliberately gained employment with the intention of committing fraud. The guidance aims to counter this risk.

PDP progress update report published

On 27 April 2022, the Pensions Dashboards Programme (PDP) published a video introducing the [April 2022 progress update report](#). The video outlines the programme activity over the past six months. This is the fifth progress update report and provides a summary of what PDP has achieved since October 2021.

HMRC

Managing pension schemes service newsletter – April 2022

On 11 April 2022, HMRC published [Managing pension schemes service newsletter – April 2022](#).

The newsletter sets out that a new feature has been added to the Managing pension schemes service. The new feature allows administrators to migrate their schemes from the Pension schemes online service. The newsletter gives information on how to do this as well as links to guidance.

The newsletter also includes information on:

- recreating existing relationships on the Managing pension schemes service
- adding new scheme administrators
- authorising new practitioners
- submitting Accounting for Tax (AFT) returns, pension scheme returns, and event reports on the Pension schemes online service
- making payments for charges using the pension scheme tax reference number
- updating information
- future features that are expected shortly, such as bulk AFT reporting and updated financial information.

Guaranteed Minimum Pension (GMP) equalisation newsletter – April 2022

On 6 April 2022, HMRC published [Guaranteed Minimum Pension \(GMP\) equalisation newsletter – April 2022](#).

This newsletter supplements previous guidance in Guaranteed Minimum Pension (GMP) equalisation newsletters [February 2020](#) and [July 2020](#) relating to benefit adjustments that registered pension schemes may have to make to remove inequalities arising from GMPs.

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.

The next session is due to take place on 3 May 2022.

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

[5 April 2022 – Public Service Pensions and Judicial Offices Act](#)

[19 April 2022 – Remedy project management update](#)

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.

FPS AGM – London – 25 and 26 October 2022 (save the date(s))

Our popular Fire Pensions Annual Conference is back for 2022! 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.

[Click here to return to Contents](#)

You will hear important updates, including:

- Chair of the Scheme Advisory Board
- The Home Office
- The Pensions Regulator
- 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. The topics of such are yet to be determined, however, we will be seeking views from the sector as to what topics they would like to be covered.

Day 1 – Tuesday 25 October 2022 16:30 – 18:30 Primarily for Scheme Managers and Local Pension Board chairs, day 1 of the conference will provide practical guidance on the role of the scheme manager and will offer the opportunity to network with counterparts in other FRAs. Following this session there will be a drinks reception on the terrace from 18:45.

Day 2 – Wednesday 26 October 2022 09:30 – 15:30 Day 2 of the conference provides delegates with an annual update on the Firefighters' Pension Scheme from key stakeholders.

The full programme and booking link will be available shortly.

CIPFA annual conference for Pension Board members

Please see below details of a training event for board members which is being run by CIPFA. As the training is primarily aimed at LGPS local pension boards, but there is some cross-over with the uniformed public service schemes, CIPFA has offered a reduced rate for those involved in the governance of Fire pensions.

Event details: 09:30 - 16:00 Wednesday 18 May 2022

The Presentation Suite KPMG, 15 Canada Square, London E14 5GL

Key speakers:

The event will be chaired by Mark Wynn from Cheshire Pension Fund. You will hear from key speakers such as Roger Phillips and Bob Holloway from the LGPS SAB, as well as Nick Gannon from TPR.

Themes:

The event will cover a number of key topics impacting Pension Boards. Of particular interest to Fire Board members include: TPR's New Single Code of Practice, Cyber Security and Good Governance. The event will also feature breakout sessions, where you will be able to discuss and share your views and experiences with other Board Members on the current issues impacting your role. The full agenda will be released before the conference.

Cost:

Discounted rate of £125 + VAT per delegate for Fire Pension Board Members. To take advantage of this special rate, please email CIPFA's Customer Service team via the link below.

Other info:

This event may have a Hybrid attendance option, for delegates who do not wish to attend in person. This will be confirmed later.

You can book onto the event at customerservices@cipfa.org.uk.

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](#)

Contact details

Claire Hey (Senior Pensions Adviser)

Telephone: 07825 731 924

Email: claire.hey@local.gov.uk

Claire Johnson (Firefighters' Pensions Adviser – Employers)

Telephone: 07920 861 552

Email: claire.johnson@local.gov.uk

Copyright

Copyright remains with Local Government Association (LGA). This bulletin may be reproduced without the prior permission of LGA provided it is not used for commercial gain, the source is acknowledged and, if regulations are reproduced, the Crown Copyright Policy Guidance issued by HMSO is adhered to.

Disclaimer

The information contained in this bulletin has been prepared by the Bluelight Pensions team, part of the Local Government Association (LGA). It represents the views of the team and should not be treated as a complete and authoritative statement of the law. Readers may wish, or will need, to take their own legal advice on the interpretation of legislation. No responsibility whatsoever will be assumed by the LGA for any direct or consequential loss, financial or otherwise, damage or inconvenience, or any other obligation or liability incurred by readers relying on information contained in this bulletin.

While every attempt is made to ensure the accuracy of the bulletin, it would be helpful if readers could bring any perceived errors or omissions to the attention of the Bluelight team by emailing bluelightpensions@local.gov.uk.



FPS Bulletin 57 – May 2022

Welcome to issue 57 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.

Contents

Calendar of events	2
Actions arising	3
FPS	3
Matthews – Second options exercise	3
Ill health “underpin”	4
Abatement guidance	4
Software workshop	5
Annual Benefit Statements 2022	6
FRA pension contacts	7
Technical query log	7
FPS England SAB updates	7
TPR factsheet	7
SAB remedy engagement sessions	8
Other News and Updates	9
Vacancy at West Yorkshire Fire and Rescue Service	9
Vacancy at London Fire Brigade	9
TPO – New online application launched	9
TPO webinars	9
TPR – Enforcement and prosecution policies consultation	10

PASA releases cybercrime protection checklist	10
DLUHC publishes statutory guidance on special severance payments	10
HMRC	11
HMRC publishes Pension Schemes Newsletter 139	11
HMRC publishes Pension Schemes Newsletter 138	11
Events	12
FPS coffee mornings	12
Payroll workshop	12
Legislation	13
Useful links	13
Contact details	14
Copyright	14
Disclaimer	14

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
Fire Communications Working Group	13 June 2022
FPS coffee morning	14 and 28 June
SAB	23 June 2022
Midlands regional group	27 June 2022
FPS Technical Group	18 July 2022
North-East regional group	17 August 2022
SAB	8 September 2022

Event	Date
FPS Technical Group	25 October 2022
FPS AGM (Save the date)	25 and 26 October 2022
SAB	8 December 2022

Actions arising

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

[Matthews – Second options exercise](#): FRAs to complete data request questionnaire by 30 June 2022.

[FRA Pension Contacts](#): FRAs to provide LGA with information on who should receive generic pension information ASAP.

FPS

Matthews – Second options exercise

As mentioned in [FPS bulletin 56 – April 2022](#), the Home Office and GAD have asked for additional data on individuals who will be in scope for the second options exercise. On 14 April 2022, we sent an email to lead FRA contacts asking them to complete a short questionnaire which sets out what data is required and the purpose of the data.

This is just a gentle reminder that this request is still outstanding for some FRAs and the deadline for completion is 30 June 2022. If any FRA has identified an issue with this deadline, we ask that they bring it to our attention at the earliest opportunity.

ACTION: FRAs to complete Matthews data request questionnaire by 30 June 2022.

Ill health “underpin”

At a recent coffee morning an FRA raised a question as to how the ill health underpin should be applied to a case. The policy intent is to ensure that a protected member who applies for IHR before 31 March 2022, where the application is determined in their favour after that date, is treated no less favourably than if the application had been determined on that date.

To avoid any such members being placed in a worse position, changes have been made to the reformed scheme rules. [Regulations 65\(2A\) and \(2B\)](#) have been inserted into the FPS 2015 regulations with effect from 1 April 2022. This means that for members where the ill-health assessment process began on or before 31 March 2022, the member is assessed for ill-health retirement against an NPA of 55. This will mean that there should be no cases where an affected member would have qualified for ill-health retirement under the legacy 1992 scheme but does not qualify under the reformed scheme.

The members benefit entitlement should be calculated in the same manner as set out in the FPS 2015 regulations.

Further information on this provision can be found in the Home Office’s [consultation response on prospective remedy](#) and their [frequently asked questions document](#). We will look to provide a consolidated version of Regulation 65 in a future bulletin.

Abatement guidance

HM Treasury (HMT) policy requires public sector pensions to be abated in certain circumstances when a public sector employee is re-employed following retirement. The general principle behind abatement is to protect the public purse from paying a pension and a salary to the same individual i.e. the income from the public purse should not be increased by the addition of a pension.

FRAs must consider the application of abatement when it occurs in accordance with the regulations of the Firefighters’ Pension Schemes.

Readers may be aware that there is currently no prescribed guidance on how abatement should be applied or calculated, as previous guidance issued by the relevant Secretary of State at the time is now out of date. The Home Office is also unable to provide formal direction on the application of abatement, as it is the legal responsibility of each FRA to interpret and apply the rules of the scheme.

In order to support a consistent national approach, we are pleased to let you know that we have now published [informal abatement guidance for FRAs](#) in the “Guides and sample documents” section of www.fpsregs.org.

The guidance has been collated following the [2019 AGM abatement workshop](#) and using examples of accepted good practice at FRAs. We have consulted with FRA FPS practitioners and administration colleagues as well as the Scheme Advisory Board and Home Office ahead of publication.

The guidance will be kept under review and updated in line with any scheme changes. We also hope to add an example abatement policy in due course. We recommend that FRAs take the guidance into account when considering future cases.

Software workshop

Attendees at the coffee morning held on 17 May will be aware that concerns were raised about the readiness of pension administration software in anticipation of retrospective remedy.

As highlighted in the meeting, the legislation needed to facilitate retrospective remedy will not come into force until 1 October 2023, at which point this will signify the start of the implementation phase. FRAs and administrators will have a period of up to 18 months to provide members with options on their scheme benefits. This means that anyone who has retired and has an entitlement to the remedy should be contacted and presented with their options.

Our software providers, Heywood and Civica, are currently working on updating their administration systems to ensure that they are fully functioning to provide the calculations needed for the retrospective legislation. Unfortunately, some modifications cannot be made without clear direction on certain policy decisions. This may mean that elements of the payroll software cannot be updated until the regulations have been made available.

Although for administrators, who have a direct relationship and are in regular contact with their software supplier, this may not come as a surprise, we suspect that it could arouse concern for an FRA. With this in mind, we have contacted the software suppliers and asked whether they would be prepared to present their implementation timeline to FRAs, which should enable FRAs to become more familiar with the overall time frame and highlight any problem areas.

We will contact FRAs once a date has been agreed with your relevant software supplier.

[Annual Benefit Statements 2022](#)

At the [Fire Technical Working Group \(FTWG\) meeting on 7 March 2022](#) we discussed annual benefit statement production (ABS) for 2022. As ABS's in 2022 will be based on current scheme regulations up to 31 March 2022, it was proposed that the same process as last year is followed, and the statements caveated in a similar way. [FPS Bulletin 44 – April 2021](#) provides more information.

However, while the recommendation last year was to suppress projections for fully protected members which would have incorrectly forecast final salary benefits beyond 31 March 2022, administrators were asked to consider that projections for former protected members could be included this year on a fully CARE basis.

The group failed to reach a consensus on this matter, it was therefore agreed that administrators will make the final call on whether to include projections or not. It is the expectation that administrators will notify the FRAs they administer on their decision.

The standard ABS template and notes have been updated with the new scheme year and the revised caveat and [published on the FPS Regulations and Guidance website](#). Examples in the annexes have been brought up to date.

We will continue to review requirements for ABS over the coming years in line with HM Treasury (HMT) policy decisions on remedy.

FRA pension contacts

As mentioned in [FPS bulletin 56 – April 2022](#), we would like to know who at your FRA needs to be sent information on generic pension related matters. We originally asked for this information to be provided by 31 May 2022, however, we have only received a fraction of replies. Please can you give this matter your urgent attention and provide us with the name and email address for your FRA's Scheme Manager. In addition please also confirm names and email addresses for anyone else who needs to be included in our communications.

Please send this information ASAP by email to bluelightpensions@local.gov.uk.

ACTION: FRAs to provide LGA with information on who should receive generic pension information ASAP.

Technical query log

The current [log of queries and responses](#) is available on 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.

No new queries have been added this month.

FPS England SAB updates

TPR factsheet

We advised readers in [FPS Bulletin 47 – July 2021](#) that the results of the [2020-21 Governance and Administration survey](#) had been published by the Pensions Regulator (TPR).

[Click here to return to Contents](#)

As part of the annual survey, TPR measures six processes as key indicators of public service pension scheme performance.

The six processes are:

1. Documented policy to manage board members conflicts of interest
2. Access to knowledge, understanding and skills needed to properly run the scheme
3. Documented procedures for assessing and managing risks
4. Process to monitor records for accuracy / completeness
5. Process for resolving contribution payment issues
6. Procedures to identify, assess and report breaches of the law

In 2020-21, 74 per cent of Firefighters' schemes across the UK reported having all six processes in place. This had increased from 55 per cent in 2019.

We have refreshed [six key processes factsheet](#) to reflect the most recent results and give guidance to FRAs and their Local Pension Boards (LPBs) to improve understanding and compliance in the next survey.

SAB remedy engagement sessions

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.

The first meeting is due to take place on 24 June 2022 where the SAB will be discussing the interest and eligibility PDDs.

Other News and Updates

Vacancy at West Yorkshire Fire and Rescue Service

Please find below details of a current vacancy for Pensions Officer which is open to existing West Yorkshire FRS employees and external applicants. The closing date for receipt of application forms is 5 June 2022.

The full details of the role and application form can be found on the [Current Vacancies](#) page of the West Yorkshire FRS website.

Vacancy at London Fire Brigade

An opportunity is coming up shortly to join the LFB as a Pension Analyst. The role is to ensure they fulfil all statutory requirements and deal effectively with pension related issues as they impact on the London Fire Commissioner.

The job will be advertised in the next few weeks on the [LFB Website](#). A [job description has been provided for information](#), if anyone is interested in this upcoming role and would like an informal chat please feel free to contact rory.murphy@london-fire.gov.uk.

TPO – New online application launched

TPO has recently launched an enhanced [online application form](#). The more user-friendly form is also smarter, with customers only required to answer relevant questions.

TPO webinars

Booking is now open for the following webinars:

[Volunteering at TPO](#) – Tuesday 7 June, 1pm

[How to avoid the Ombudsman](#) – Tuesday 19 July, 10am

[How to avoid the Ombudsman](#) – Tuesday 19 July, 2pm

[TPR – Enforcement and prosecution policies consultation](#)

On 4 May 2022, TPR launched a consultation on its new consolidated and simpler draft enforcement policy and an updated prosecution policy. The [Enforcement and prosecution policies consultation](#) will close on 24 June 2022.

The [Draft scheme management enforcement policy](#) will replace existing policies for defined benefit, defined contribution and public service pension schemes. The Draft prosecution policy explains how TPR will approach the prosecution of workplace pension criminal offences or are otherwise related to TPR functions.

[PASA releases cybercrime protection checklist](#)

The PASA Cybercrime and Fraud Working Group has published a [Cybercrime protection checklist](#) for pension administrators. The checklist builds on cybercrime guidance published by the group in November 2020. It provides examples of steps administrators can take to assess their defences against cybercrime.

[DLUHC publishes statutory guidance on special severance payments](#)

On 12 May 2022, the Department for Levelling Up Housing and Communities (DLUHC) published [statutory guidance on special severance payments](#). Best Value authorities in England must have regard to the guidance in circumstances in which it may be appropriate to make Special Severance Payments. The guidance also covers approval, disclosure and reporting requirements. The guidance does not apply to authorities in Wales. You can find a list of the bodies the guidance applies to at the end of the guidance.

The guidance confirms that:

- strain cost related to the early payment of LGPS benefits under regulation 30(6) or (7) (flexible retirement, redundancy, or efficiency retirement over age 55) does not constitute a special severance payment
- strain cost of awarding additional pension under regulation 31 of the LGPS Regulations 2013 may constitute a Special Severance Payment, depending on the terms of the individual's contract

- strain cost related to waiving an actuarial reduction when a member retires under regulation 30(5) may constitute a Special Severance Payment, depending on the terms of the individual's contract.

DLUHC consulted on a draft version of this guidance in 2021.

Considering the above, we contacted the Home Office to establish whether any consideration needs to be taken of the strain costs for releasing benefits early under Authority/Employer initiated early retirement or waiving restricted commutation under the FPS. The Home Office confirmed that, although this policy sits outside of its pensions remit, it has contacted the policy lead at DLUHC, who has confirmed that both instances (i.e. fitness assurances and commutation uplift) would not fall within the scope of special severance payments.

HMRC

HMRC publishes Pension Schemes Newsletter 139

On 31 May 2022, HMRC published [Pension schemes newsletter 139](#), which contains articles on:

- relief at source — annual return of information for 2021 to 2022
- digitisation of relief at source
- managing Pension schemes service
- Accounting for Tax (AFT) returns

HMRC publishes Pension Schemes Newsletter 138

On 29 April 2022, HMRC published [Pension schemes newsletter 138](#), which contains articles on:

- HMRC has updated its annual allowance calculator to include the 2022 to 2023 tax year

- changes to Scheme Pays reporting deadlines in some cases following the introduction of the Registered Pension Schemes (Miscellaneous Amendments) Regulations 2022 (see [FPS Bulletin 56 – April 2022](#) for more information)
- a reminder to take action now to [migrate your pension scheme to the Managing Pension Schemes service](#)
- accounting for tax returns for the quarter ending 31 March 2022 must be submitted through the Managing Pension Schemes service.

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.

The next session is due to take place on 14 June 2022.

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

[3 May 2022 – Contingent decisions](#)

[17 May 2022 – Transitional benefits post 1 April 2022](#)

[31 May 2022 – ABS and RSS](#)

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.

Payroll workshop

On 24 May 2022 we hosted a payroll workshop. The workshop was intended to bring the industry together and give colleagues an opportunity to share feedback and best practices on the data collection exercise needed for age discrimination remedy.

[Click here to return to Contents](#)

We are pleased to note that the session was well attended with over 50 delegates dialling in and participating in the discussion.

Slides covering the event have been made available and can be found on the [age discrimination implementation page of the FPS Regs and Guidance Website](#). The slides were updated to reflect the comments and suggestions made in the meeting. We will also be updating the [remedy data collection guidance](#) in the coming weeks.

Legislation

SI	Reference title
2022/509	The Financial Guidance and Claims Act 2018 (Commencement No 9) Regulations 2022

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](#)

Contact details

Claire Hey (Senior Pensions Adviser)

Telephone: 07825 731 924

Email: claire.hey@local.gov.uk

Claire Johnson (Firefighters' Pensions Adviser – Employers)

Telephone: 07920 861 552

Email: claire.johnson@local.gov.uk

Elena Johnson (Firefighters' Pensions Adviser – Governance)

Email: elena.johnson@local.gov.uk

Copyright

Copyright remains with Local Government Association (LGA). This bulletin may be reproduced without the prior permission of LGA provided it is not used for commercial gain, the source is acknowledged and, if regulations are reproduced, the Crown Copyright Policy Guidance issued by HMSO is adhered to.

Disclaimer

The information contained in this bulletin has been prepared by the Bluelight Pensions team, part of the Local Government Association (LGA). It represents the views of the team and should not be treated as a complete and authoritative statement of the law. Readers may wish, or will need, to take their own legal advice on the interpretation of legislation. No responsibility whatsoever will be assumed by the LGA for any direct or consequential loss, financial or otherwise, damage or inconvenience, or any other obligation or liability incurred by readers relying on information contained in this bulletin.

[Click here to return to Contents](#)

While every attempt is made to ensure the accuracy of the bulletin, it would be helpful if readers could bring any perceived errors or omissions to the attention of the Bluelight team by emailing bluelightpensions@local.gov.uk.



FPS Bulletin 58 – June 2022

Welcome to issue 58 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.

Contents

Calendar of events	2
Actions arising	3
FPS	3
Home Office collection of FPS forecasts for 2022-23 to 2027-28	3
Matthews – Lessons learned	4
Immediate Detriment Framework costing and assumption guidance	5
Bluelight inbox and query form	5
Annual Benefit Statements 2022 – Information factsheet	7
Technical query log	7
FPS England SAB updates	7
SAB respond to HM Treasury's letter	7
Other News and Updates	8
DWP call for evidence – helping savers understand their pension choices	8
Further consultation on Pensions Dashboards launched	8
PDP update	9
TPR Deadline Campaign for Pensions Dashboards	9
TPR corporate plan 2022 to 2024	10
TPR blog on pensions scammers	11
State pension triple lock reinstated	11
Job vacancies	12

Vacancy at Nottinghamshire Fire and Rescue Service	12
Vacancy at West Midlands Fire Service	12
Vacancy at London Fire Brigade	12
Vacancy at West Sussex County Council	13
Events	13
FPS coffee mornings	13
Useful links	13
Contact details	14
Copyright	14
Disclaimer	15

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	12 and 26 July
FPS Technical Group	18 July 2022
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 (Save the date)	25 and 26 October 2022
SAB	8 December 2022

Actions arising

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

[Home Office collection of FPS forecasts](#): FRAs to submit pension income/expenditure forecasts by 19 August 2022.

[Bluelight inbox and query form](#): FRAs and administrators to use the Bluelight inbox for email correspondence with the Bluelight team.

FRAs and administrators to complete query form when submitting a technical query.

[Annual Benefit Statement 2022 – Information factsheet](#): Administrators to include ABS factsheet with 2021/22 benefit statement distribution.

[TPR dashboard guidance](#): FRAs to read dashboard guidance and book onto webinar.

FPS

Home Office collection of FPS forecasts for 2022-23 to 2027-28

On 21 June 2022, the Home Office emailed all FRAs in England to request submission of their pension income/expenditure forecasts for the period 2022-23 to 2027-28.

The formal commissioning letter at [Appendix 1](#) sets out the centrally prescribed assumptions that must be applied when calculating pension income and expenditure forecasts. The forms can be accessed on DELTA from 1 July 2022. The deadline for submissions is Friday 19 August 2022.

FRAs are also required to complete the Excel table at [Appendix 2](#) in order to declare the local assumptions that they have applied to calculate their pension estimates. The prescribed assumptions that FRAs should use for CPI percentage increases, pay increases and employer contribution rates for the forecasting period have already been pre-populated on the table.

Please note that payment of the 2022 Top Up grant will be conditional on its completion and incomplete tables will be returned to FRAs.

For the avoidance of any confusion, there are **two returns required by 19 August 2022**:

1. The online DELTA returns setting out the 6-year forecast of pension income and expenditure.
2. Assumptions returns (email direct to anthony.mooney@homeoffice.gov.uk attaching the completed table above).

FRAs are reminded that forecast pension accounting data is being subjected to an ever-increasing scrutiny and, as such, they should ensure that processes are in place to ensure that they have a robust methodology to calculate these. [Best practice forecasting guidance](#) was published by the Pension Forecasting Working Group in July 2019.

Matthews – Lessons learned

The Home Office has recently shared with us a [draft document which outlines the lessons learned](#) from the first special members' options exercise.

This high-level paper has been produced for stakeholders involved in Matthews Remedy work. The purpose of this paper is to identify the areas of improvement from the previous remedy project and how to implement the lessons identified. The lessons referenced are drawn from the experience and reflections of the Home Office, Government Actuary Department and Local Government Association on Matthews Remedy options exercise which took place between April 2014 and September 2015.

Stakeholders had opportunity to discuss the key points from the paper at our latest [coffee afternoon session on 28 June 2022](#).

Feedback is welcomed from the sector as to whether anything is missing from the document which should have been captured. Please send any thoughts and suggestions through to the Bluelight inbox (bluelightpensions@local.gov.uk).

[Click here to return to Contents](#)

Immediate Detriment Framework costing and assumption guidance

On 26 May 2022, the LGA in collaboration with Ian Hayton, Cleveland FRS CFO and NFCC pensions lead, hosted a session via MS Teams relating to the Financial Assessment for Immediate Detriment. The session was open to all FRAs, and the invite was shared with CFOs.

The LGA has been working closely with Cleveland FRS to establish a calculator which should enable FRAs to estimate their financial liabilities when considering adoption of the Framework.

The session was designed to provide participants with an overview of the financial assumption spreadsheets. The LGA provided attendees with an explanation of the spreadsheets which included how each column interacts with the final data as well as a demonstration on how to complete the spreadsheet.

It was agreed at this meeting that the LGA would prepare some guidance for FRAs on how they can effectively use the spreadsheet. We are pleased to confirm that the guidance, along with template spreadsheets, has now been published and is available to access via the [age discrimination page in the member protected area](#) of the FPS Regulations and Guidance website.

Before using the spreadsheet, it is worth noting that it has been designed to provide FRAs with a basic estimate of their financial exposure; it does not cover every eventuality and it is based on the LGA's current understanding of what the main financial liabilities are.

Bluelight inbox and query form

Now that the Bluelight team is up to full strength please can we ask that all queries are sent to the generic Bluelight inbox (bluelightpensions@local.gov.uk). This will enable the most appropriate team member to respond as well as ensuring that queries can be dealt with when someone is on leave.

In addition, please can we remind readers of the process to follow when submitting a technical query. [FPS Bulletin 9](#) confirmed that a query form had been developed which asks for information in the following areas:

[Click here to return to Contents](#)

- Details of your query
- Area of uncertainty / challenge
- Proposed solution
- Research undertaken: Relevant legislation, HMRC guidance, relevant websites, historical background (circulars or technical meeting minutes), legal advice [Include links]
- Indication of amounts (£) involved
- Timescales involved
- Other supporting evidence

Receiving queries in this way allows us to build up a picture of frequently asked questions and ensure greater consistency in our responses. We can build up a knowledge bank of resources and be able to more easily identify common areas of uncertainty, where dedicated training or workshops could be offered.

The form and notes for completion are available on the [technical queries page](#) of the FPS Regulations and Guidance website. Once completed, the form should be submitted to bluelight.pensions@local.gov.uk. Your query will be acknowledged upon receipt, and we will aim to reply to your query within 28 days. If we cannot reply with a full response within 28 days, we will let you know and tell you when you can expect to receive a full reply from us.

Please note that we have taken the opportunity to move the technical queries page to the password-protected area of the website, as it intended as a dedicated resource for practitioners. Therefore, you will now need to log in to access the form and the log of previous queries.

ACTION: FRAs and administrators to use the Bluelight inbox for email correspondence with the Bluelight team.

FRAs and administrators to complete query form when submitting a technical query.

Annual Benefit Statements 2022 – Information factsheet

At the Fire Communications Working Group (FCWG) meeting on 13 June 2022 we discussed whether it would be beneficial to provide members who are affected by age discrimination remedy with any additional information alongside their annual benefit statement.

Although the notes clearly indicate that benefit statements cannot at this stage reflect remedy, the group thought that it would be prudent to provide members with an additional information note which outlines the timeframes associated with remedy.

The factsheet is available to access via the [guides and sample documents page](#) of the FPS Regulations and Guidance website, under the heading Annual Benefit Statements (ABS). All administrators are encouraged to send the document to members impacted by remedy, with the 2021/22 benefit statements.

Action: Administrators to include ABS factsheet with 2021/22 annual benefit statement distribution.

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: Commutation (page 19).

FPS England SAB updates

SAB respond to HM Treasury's letter

We reported in [FPS Bulletin 52](#) that the chair of the SAB had written an [open letter to HM Treasury \(HMT\) on the withdrawal of the Home Office informal guidance](#) on immediate detriment. The letter, dated 17 December 2021, asked for more information on the risks and uncertainties which HMT said arose as a result of processing cases ahead of legislation.

[Click here to return to Contents](#)

On 23 March 2022, [HMT provided a response outlining the factors behind the withdrawal](#) in more detail. The response highlighted that Section 61 of the Equality Act 2010 did not, in HMT's opinion, allow for amendment of a member's tax position. The response detailed several tax complexities which had been identified and will be dealt with through legislation.

On 20 June 2022, the chair of the SAB wrote an [open letter in response to HMT's reply](#) which seeks further clarity on the extent of Sections 61/ 62 and the tax implications detailed.

Other News and Updates

DWP call for evidence – helping savers understand their pension choices

On 14 June 2022, the Department for Work and Pensions (DWP) launched a [Call for Evidence entitled: 'Helping savers understand their pension choices'](#).

The call for evidence explores what support pension scheme members need to help them make informed decisions about how to use their savings.

DWP welcomes views from pension scheme members, consumer organisations, trustees, and scheme managers.

The consultation closes on 25 July 2022.

Further consultation on Pensions Dashboards launched

On 28 June 2022, DWP launched a further consultation on Pensions Dashboards: [Pensions dashboards: further consultation - GOV.UK \(www.gov.uk\)](#)

This further consultation supplements the consultation on the draft dashboard regulations which ran from 31 January 2022 to 13 March 2022. More information, including the LGA FPS response to that consultation, can be found on the [consultations page](#) of [www.fpsregs.org](#).

The further consultation sets out two proposals. The first proposal provides clarity on the 'Dashboard Available Point' (DAP). The second proposal allows the Money and Pensions Service and the Pensions Regulator to share information about dashboards with each other.

The DAP is the point at which dashboards will be available to all members of the public. The consultation proposes that the DWP will decide on the DAP and then give pension schemes 90 days' notice. It is hoped that this will give schemes sufficient time to make final preparations.

The consultation is scheduled to run for 3 weeks and closes on 19 July 2022.

PDP update

Speaking at the Pensions Age Northern Conference and the PLSA Local Authority Conference Chris Curry, Principle of the Pensions Dashboards Programme (PDP), confirmed that:

- DWP is expected to respond to the consultation on the draft regulations for pensions dashboards before summer recess, with the regulations likely to be laid in parliament later this year.
- Dashboards are still on track for 2023, with less than 12 months until some schemes begin onboarding.
- Later in the year PDP will be running a further consultation on the specific standards for dashboards, which they will look to work with the industry through webinars and events.
- PDP has successfully tested an end-to-end version of the dashboards ecosystem and that the alpha phase of the project was complete.

TPR Deadline Campaign for Pensions Dashboards

The Pensions Regulator (TPR) has launched its new "Deadline" campaign urging trustees and scheme managers to start preparing for pensions dashboards.

It is expected that occupational pension schemes with 100 or more relevant members will connect to the pensions dashboards through a phased approach according to size and type of pension scheme. The first schemes will connect to the dashboards system by June next year and TPR will begin writing to them at least twelve months ahead of their connection deadline to alert them to what they need to do.

To help trustees and scheme managers get ready, TPR has published [Pensions dashboards: initial guidance](#) which outlines their legal duties, based on draft regulations, including a checklist to help track progress. TPR are urging the following:

- All schemes need to prepare, so it is vital that all schemes start to prioritise their duties and not leave them until the last minute-your pensions dashboard deadline is coming.
- Include pension dashboards as an agenda item at trustee board meetings.
- Decide how you will connect-i.e., using your current pensions administrator, an integrated service provider, or building your own connection solution.
- Check that the data you will use to match people with their pensions and return to the dashboard is available, accurate and assessable.

[Check your connection deadline and download a checklist](#)

TPR is hosting a webinar and Q&A on 28 July 2022 to take you through the steps you need to take to prepare for connection. [Register to save your place.](#)

TPR corporate plan 2022 to 2024

On 13 June 2022, [TPR published its corporate plan](#) for the next two years. Their [press release](#), confirms they will continue to:

- call on schemes to take its pledge to combat pension scams
- work closely with DWP and the Financial Conduct Authority (FCA) on a future consultation for a Value for Money Framework

[Click here to return to Contents](#)

- assess how smaller defined contribution schemes offer value for money
- help schemes become dashboard ready
- develop its organisational capability with the creation of a Digital, Data and Technology directorate
- launch its second consultation on a new defined benefit funding code this autumn, with the code operational from September 2023.

TPR blog on pensions scammers

On 15 June 2022, [TPR published a blog on pension scammers](#). The blog highlighted that tough prison sentences alone are not enough to dissuade all scammers and secure savers' pension pots.

TPR needs the pensions industry to make use of the new powers to block transfers they suspect are scams and, to report any suspected scams to the appropriate authorities.

TPR know scammers' methods will continue to evolve and are working with the National Fraud Intelligence Bureau to jointly [review the threat of pension scams](#).

Most importantly, schemes should [report concerns about scams to the authorities](#). To help do this effectively TPR and their partners have published [a guide to reporting pension scams](#).

The guide looks at:

- Why concerns about a scam should be reported
- What should be reported
- When report should be made
- Who a report should be made to
- What happens once a report has been submitted

State pension triple lock reinstated

Chancellor Rishi Sunak has confirmed that the [state pension triple lock will be reinstated next April](#) after it was put on hold last April. It is likely to be based on the September 2022 consumer price index, which is expected to be around 10 per cent.

[Click here to return to Contents](#)

Job vacancies

Vacancy at Nottinghamshire Fire and Rescue Service

Please find below details of a current vacancy for a Pensions Officer which is open to existing Nottinghamshire FRS employees and external applicants. The closing date for receipt of application forms is 17 July 2022.

“We are looking for a Pensions Officer, working part-time 3 days a week. This is an exciting opportunity for an experienced pension expert. You will provide advice and guidance to the Service on the Fire Pension Scheme (FPS) and Local Government Pension Scheme (LGPS). You will act as a technical expert and advise on pension regulations overseeing the implementation of legislative changes.

Further information and an online application form are available via our Recruitment Website at <https://jobs.notts-fire.gov.uk>”

Vacancy at West Midlands Fire Service

Please find attached below details of a current vacancy for a Pensions Practitioner at West Midlands Fire Service. The closing date for receipt of application forms is 12.00 on 7 July 2022:

[West Midlands Fire Service Pensions Practitioner Vacancy](#)

Vacancy at London Fire Brigade

As detailed in [FPS Bulletin 57](#), an opportunity has arisen to join the LFB as a Pensions Analyst. The role is to ensure they fulfil all statutory requirements and deal effectively with pension related issues as they impact on the London Fire Commissioner. The closing date for receipt of application forms is 7 July 2022:

[Finance Pensions Analyst \(london-fire.gov.uk\)](#)

Vacancy at West Sussex County Council

Please find attached below details of a current vacancy for a Pensions Adviser at West Sussex County Council. The closing date for receipt of application forms is 13 July 2022:

[Pensions Adviser West Sussex County Council](#)

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.

The next session is due to take place on 12 July 2022.

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

[14 June 2022 – TPR Governance and Administration survey results 2020-21](#)

[28 June 2022 – Matthews - lessons learned](#)

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.

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](#)

[Click here to return to Contents](#)

- [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](#)

Contact details

Claire Hey (Senior Pensions Adviser)

Telephone: 07825 731 924

Email: claire.hey@local.gov.uk

Claire Johnson (Firefighters' Pensions Adviser – Employers)

Telephone: 07920 861 552

Email: claire.johnson@local.gov.uk

Elena Johnson (Firefighters' Pensions Adviser – Governance)

Telephone: 07770 763 031

Email: elena.johnson@local.gov.uk

Copyright

Copyright remains with Local Government Association (LGA). This bulletin may be reproduced without the prior permission of LGA provided it is not used for commercial gain, the source is acknowledged and, if regulations are reproduced, the Crown Copyright Policy Guidance issued by HMSO is adhered to.

Disclaimer

The information contained in this bulletin has been prepared by the Bluelight Pensions team, part of the Local Government Association (LGA). It represents the views of the team and should not be treated as a complete and authoritative statement of the law. Readers may wish, or will need, to take their own legal advice on the interpretation of legislation. No responsibility whatsoever will be assumed by the LGA for any direct or consequential loss, financial or otherwise, damage or inconvenience, or any other obligation or liability incurred by readers relying on information contained in this bulletin.

While every attempt is made to ensure the accuracy of the bulletin, it would be helpful if readers could bring any perceived errors or omissions to the attention of the Bluelight team by emailing bluelightpensions@local.gov.uk.



Compliance

Firefighters' Pension Schemes annual update

Contributions banding

The [contributions banding factsheet](#) reminds Fire and Rescue Authorities (FRAs) of the contribution rates that apply for 2022/23 as set out in the scheme regulations.

FPS 2015 Additional Pension purchase limit for 2022/23

As detailed in [FPS Bulletin 2](#), no determination under [rule 2, \(1\)\(b\)\(i\) of schedule 1](#) was made by HM Treasury on the overall limit of extra pension for 2017/18. There has been no determination in any subsequent year.

Paragraphs (1)(b)(ii) and (2)(a)&(b) confirm that the limit on the Additional Pension that can be purchased in FPS 2015 is therefore increased on the 1 April for any scheme year beginning on or after 1 April 2016 as if it were a pension beginning on the first day of the previous scheme year to which the Pensions (Increase) Act 1971 applies.

The overall Additional Pension limit has increased by 3.1% to £7,295 from 1 April 2022.

Public Service Pension Indexation and Revaluation 2022

On 20 January 2022, HM Treasury (HMT) issued [written statement HCWS548](#) confirming the Public Service Pension Indexation and Revaluation for 2022.

Public service pensions will be increased in line with the annual increase in the Consumer Prices Index up to September 2021. The increase from 11 April 2022 is 3.1%, as set out in the [Pension Increase \(Review\) Order 2022](#) [SI 2022/333].

FPS 2015 will use the figure of 4.1% as set out in the [Public Service Pensions Revaluation Order 2022](#) [SI 2022/215] for the earnings element of revaluation for active members to be applied at one second after midnight on 31 March 2022.

HMRC limits applicable from 6 April 2022

The Chancellor of the Exchequer announced in the 2021 Budget that the lifetime allowance would remain at its current level of £1,073,100 until April 2026. Freezing the lifetime allowance is provided for in the [Finance Act 2021](#).

The standard annual allowance, defined in section 228 of the Finance Act 2004, is unchanged at £40,000 for 2022/23. There are no changes in the tapered annual allowance provisions as set out in section 228ZA of the Finance Act 2004 for the 2022/23 year. These are shown in the table below.

Table 1: Annual allowance limits 2022/23

Limit	Amount
Standard annual allowance	£40,000
Threshold income	£200,000
Adjusted income	£240,000
Minimum tapered annual allowance	£4,000

Automatic Enrolment Earnings Bands

Employers will need to know the earnings bands that apply for 2022/23 for the purposes of automatic enrolment under the Pensions Act 2008. The Government announced in its [review of the automatic enrolment earnings trigger](#) for 2022/23 that the earnings trigger will remain at its current level of £10,000. This is unchanged since the 2015/16 year. The tables below show the position for the 2022/23 year.

Table 2: Automatic enrolment (AE) earnings bands 2022/23

Earnings*	Age 16-21	Age 22 to <SPA**	Age SPA** to <75
Under lower earnings threshold (£6,240***)	Entitled worker	Entitled worker	Entitled worker
Between £6,240*** and £10,000	Non-eligible jobholder	Non-eligible jobholder	Non-eligible jobholder
Over earnings trigger for automatic enrolment (£10,000)	Non-eligible jobholder	Eligible jobholder	Non-eligible jobholder

* Earnings: separate contracts are treated separately

** State Pension Age

*** To align with National Insurance contributions lower earnings limit

Table 3: AE earnings bands per period

Pay reference period	Lower earnings threshold pa	Earnings trigger for automatic enrolment
Annual	£6,240.00	£10,000.00
6 months	£3,120.00	£4,998.00
3 months	£1,560.00	£2,499.00
1 month	£520.00	£833.00
4 weeks	£480.00	£768.00
2 weeks	£240.00	£384.00
1 week	£120.00	£192.00

Annual GMP increase

An increase of 3% should be applied on 6 April 2022 to the post-5 April 1988 GMP element of a pension in payment.

Some members will be entitled to a further increase to the post-5 April 1988 GMP on 11 April 2022 under the Pensions Increase (Review) Order 2022 if they reached State Pension age after 5 April 2016. If the Pensions Increase date is 26 April 2021 or earlier, a further increase of 0.1% is due to bring the total increase on the post-5 April 1988 GMP to 3.1%. The increase on 11 April 2022 is 0.1% of the post-5 April 1988 GMP in payment on 5 April 2022. The same increase will apply to the post-5 April 1988 GMP on 11 April 2022 if the individual reached State Pension age before 6 April 2016 and AC is less than GMP, i.e. paragraphs 3 to 6 of the [HMT Direction on section 59A of the Social Security Pensions Act 1975](#) apply.

If the individual reached State Pension age after 5 April 2016, a 3.1% increase applies on 11 April 2022 to the pre-6 April 1988 GMP element of the pension in payment. A pro-rata increase will apply if the member's PI date is after 26 April 2021. The same increase will apply to the pre-6 April 1988 GMP on 11 April 2022 if the individual reached State Pension age before 6 April 2016 and AC is less than GMP, i.e. paragraphs 3 to 6 of the [HMT Direction on section 59A of the Social Security Pensions Act 1975](#) apply.

The post 5 April 1988 GMP increase is set out in [The Guaranteed Minimum Pension Increase Order 2022](#) [SI 2022/297].

The Social Security Revaluation of Earnings Factors Order 2022

The [Social Security Revaluation of Earnings Factors Order 2022](#) [SI 2022/216] comes into force on 6 April 2022. The earnings factors are used to calculate a Scheme member's GMP. The percentage increase for the tax year 2022/23 is 4.5%. The increase is based on the increase in the general level of earnings in Great Britain.

All relevant legislation can be viewed on our website under [annual update Statutory Instruments](#).

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

I = Impact L = Likelihood

Reference	Risk Title	Cause and Effect	Priority (I x L)	Risk Control Residual	Action Required Target Risk
	Management of the transfer of scheme member affected by the McCloud and Sargeant ruling				
	Risk Owner: Strategic Finance	Fire Fighters were automatically transferred to the 2015 Home Office Police pension scheme.			
	Last Updated: 05 July 2022 Latest Review Date: 05 July 2022 Latest Review By: Joint Head of Finance	The position is now in remedy the national working group are working with administrators to deliver an effective settlement		Pension Scheme Regulations and Home Office Guidance, of which the Force acted upon.	Continued monitoring of the national picture and once guidance is issued ensuring that WYPF are on top of this risk.
1	Latest Review Comments: Failure to update scheme rules or comply with legislation	Failure to manage the risk on transfer could lead to additional cost exposure and stakeholder concerns	I = 4, L = 3	12 Continued payment until remedy	Furthermore, by supplier and WNH engagement we can ensure a full reconciliation of transferred data and ownership
	Risk Owner: Joint Head of Finance				
	Last Updated: 05 July 2022 Latest Review Date:				
2	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
	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:				
3	Comments: disaster plans have been reviewed and tested (during the first peak as well), XPS are working from home and social distancing Failure to inform members of pension changes	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
	Risk Owner: Joint Head of Finance Last Updated: 05 July 2022 Latest Review Date:				
4	Latest Review By: Inadequate reporting to tPR, HMRC, 3rd parties	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 Resouces Officer
	Risk Owner: Strategic Finance Manager				
	Last Updated: 05 July 2022 Latest Review Date: Latest Review By: Joint Head of Finance				
5	Inadequate reporting to TPR, HMRC and third parties.	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.
	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:				
6	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.	HR to remind new recruits of the positive pension scheme, post their 2 year training. Person Responsible: Lead HR Officer
	Force to actively promote benefits				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

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				