

Notice of Meeting

Surrey Local Firefighters' Pension Board

**Date & time**

Thursday, 13
January 2022 at
12.00 pm

Place

Council Chamber,
Woodhatch Place,
11 Cockshot Hill,
Reigate, Surrey,
RH2 8EF

Contact

Joss Butler
Woodhatch Place,
11 Cockshot Hill,
Reigate, Surrey,
RH2 8EF

Chief Executive

Joanna Killian

joss.butler@surreycc.gov.uk

Elected Member

Councillor Nick Harrison (Employer Representative, Firefighters' Pension Scheme) (Chairman)

Independent Representatives:

Richard Jones (Employee Representative, Firefighters' Pension Scheme), Glyn Parry-Jones (Employee Representative, Firefighters' Pension Scheme) and Dan Quin (Employer Representative, Firefighters' Pension Scheme) (Vice-Chairman)

AGENDA

1 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

2 MINUTES FROM THE PREVIOUS MEETING:

(Pages 5
- 10)

To agree the minutes as a true record of the meeting.

3 DECLARATIONS OF INTEREST

To receive any declarations of disclosable pecuniary interests from Members in respect of any item to be considered at the meeting.

Notes:

- In line with the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, declarations may relate to the interest of the member, or the member's spouse or civil partner, or a person with whom the member is living as husband or wife, or a person with whom the member is living as if they were civil partners and the member is aware they have the interest.
- Members need only disclose interests not currently listed on the Register of Disclosable Pecuniary Interests.
- Members must notify the Monitoring Officer of any interests disclosed at the meeting so they may be added to the Register.
- Members are reminded that they must not participate in any item where they have a disclosable pecuniary interest.

4 QUESTIONS AND PETITIONS

To receive any questions or petitions.

Notes:

1. The deadline for Member's questions is 12.00pm four working days before the meeting (7 January 2022).
2. The deadline for public questions is seven days before the meeting (6 January 2022)
3. The deadline for petitions was 14 days before the meeting, and no petitions have been received.

5 SURREY LOCAL FIREFIGHTERS' PENSION BOARD ACTIONS AND RECOMMENDATIONS TRACKER

(Pages
11 - 18)

To note the Actions and Recommendations Tracker.

6 SCHEME MANAGEMENT UPDATE REPORT

(Pages
19 - 22)

The Board has requested an update on Scheme management activities.

7 ADMIN BULLETIN UPDATE

(Pages
23 - 48)

The Local Firefighters' Pensions Board has adopted a procedure to ensure that any FPS Bulletins released by the Local Government Association (LGA) are reviewed and any necessary actions are noted and tracked through to completion.

8 RISK REGISTER

(Pages
49 - 50)

The Board is asked to note the contents of the Risk Register.

9 XPS UPDATE

Report to follow.

10 DATE OF THE NEXT MEETING

To note the date of the next meeting as 28 April 2022.

Joanna Killian
Chief Executive
Published: 5 January 2022

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MINUTES of the meeting of the **SURREY LOCAL FIREFIGHTERS' PENSION BOARD** held at 10.00 am on 25 November 2021 at Woodhatch Place, Reigate.

These minutes are subject to confirmation by the Committee at its meeting on Thursday, 13 January 2022.

(* present)

Elected Members:

- * Nick Harrison (Chairman)
- * Richard Jones
- * Glyn Parry-Jones
- * Dan Quin (Vice-Chairman)

65/21 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS [Item 1]

None received.

66/21 MINUTES FROM THE PREVIOUS MEETING: 5 AUGUST 2021 [Item 2]

The minutes were agreed as an accurate record of the meeting.

67/21 DECLARATIONS OF INTEREST [Item 3]

None.

68/21 QUESTIONS AND PETITIONS [Item 4]

There were none.

69/21 SURREY LOCAL FIREFIGHTERS' PENSION BOARD ACTIONS AND RECOMMENDATIONS TRACKER [Item 5]

Witnesses:

Sally Wilson, Head Of Data, Digital & Special Projects

Key points raised during the discussion:

1. The Chairman introduced the item and summarised each action update.
2. In regards to A1/20, The Head of Data, Digital & Special Projects explained that there was little to update on the access to modified pension scheme as the expression of interest forms had been circulated with a return deadline of end of 2021.
3. In regards to A19/20, the Head of Data, Digital & Special Projects provided an update on the Internal Pensions Team within the Fire and Rescue Service. Members noted that there was now a Senior Pensions Advisor and a Pensions Project Support Officer within the team. In addition, two further team members previously employed through Orbis had been added on a temporary basis,

4. In regards to A5/21, The Board noted that pensions training had previously been held by the Local Government Authority (LGA) in Spring 2021. Officers agreed to look into booking a further training session for the Board in Spring 2022.

Actions/ further information to be provided:

A5/21 (update) – For Head of Data, Digital & Special Projects to consider options for pensions training for Spring 2022.

Recommendations:

The Board noted the Actions and Recommendations Tracker.

70/21 SCHEME MANAGEMENT UPDATE REPORT [Item 6]

Witnesses:

Sally Wilson, Head of Data, Digital & Special Projects

Key points raised during the discussion:

1. The Head of Data, Digital & Special Projects introduced the item and noted the following:
 - A. That the self-service portal was now live and that all users should have received their activation keys. The Board also noted that the service had received positive feedback on the portal.
 - B. The Service was currently considering the Memorandum of Understanding from the Local Government Association and the Fire Brigade Union on Immediate Detriment Remedy. The Board noted that a decision would follow the risk assessment.
 - C. In regards to 10% Pensionable Allowance, letters would be circulated to priority 1 & 2 cohorts by the end of December 2021. The Board also noted that a further cohort, firefighters that retired prior to 2014, would be contacted at a later stage.
2. Officers confirmed that they were looking into the statute of limitations period for the payback of contributions.
3. The Board asked whether the service had considered options for how the contributions would be repaid. Officers stated that they were in discussion with payroll and finance around how payback would be undertaken.
4. Concerning the limitation period, the Board noted that the date would begin from when the service first received legal advice on 10 October 2021.
5. The Board noted the successful transfer of the Administration service to XPS, and thanked all involved in the project.

Actions/ further information to be provided:

None.

Recommendations:

The Board noted the report.

**71/21 XPS ADMINISTRATION - SURREY FIRE AND RESCUE SERVICE
PENSION BOARD REPORT [Item 7]**

Witnesses:

Paul Mudd, XPS

Sally Wilson, Head of Data, Digital & Special Projects

Key points raised during the discussion:

1. The representative from XPS introduced the report and made the following comments:
 - A. That XPS felt the transition to XPS went well.
 - B. That many checks had taken place to ensure the data was transferred from the service correctly.
 - C. Provided a brief overview of XPS as a business as well as a run through of the staff within the XPS team.
 - D. An overview of the common data analysis
 - E. Provided an overview of the completed cases as noted in the report.
2. The Board noted that performance statistics for the first two months were encouraging, showing a performance standard of 90% or more.
3. Regarding common data, the Chairman stated it was important to trace and confirm addresses for those people coming up to, or past retirement age. Following further discussion, an action was agreed for the Head of Data, Digital & Special Projects to work with XPS to use a tracing service to confirm address for those past retirement, or within two years of retirement.
4. The Chairman highlighted that there were some issues outstanding prior to the transition to XPS and request an update on their status. The representative from XPS said that there were 178 outstanding tasks at the transition point and that 99 tasks had been cleared so far.
5. A Member of the Board highlighted that he had received positive feedback on the self-service portal however he had received comments that the portal was not displaying additional purchased benefits. The representative from XPS stated that he would speak to the system designers to understand whether additional benefits could be included within the system.
6. A Member of the Board asked whether the pension forecast displayed on the portal could be broken down into more information so that the user could better understand how the forecast was calculated. The representative stated that he would take the members comments away for consideration.
7. The Board had a discussion around benefit statements for scheme members not displaying the correct pensionable pay values in regards to the 10% allowances. The representative from XPS explained that, once the 10% allowance exercise was concluded, XPS would be able to rerun the benefit statement program.
8. The Chairman highlighted that member of the Board could contact the XPS pension's email address if they had any further feedback or support. Following on, the Chairman asked XPS to consider including data on any helpline backlog within a future report.

Actions/ further information to be provided:

A7/21 - For the Head of Data, Digital & Special Projects to work with XPS to use a tracing service to confirm addresses for those past retirement or within two years of retirement.

A8/21 – For XPS to provide a continuing update on the clearing of outstanding tasks inherited in the transfer to XPS.

A9/21 – For XPS to provide an update on the suggestions for improvements in the self-service portal, and on the help line backlog.

Recommendations:

The Board noted the report.

72/21 XPS - IMMEDIATE DETRIMENT FRAMEWORK REPORT AND ANALYSIS [Item 8]

Witnesses:

Paul Mudd, XPS

Sally Wilson, Head of Data, Digital & Special Projects

Key points raised during the discussion:

1. The representative from XPS introduced the report and provided a brief summary on Immediate Detriment Framework as outlined in the report.

Actions/ further information to be provided:

None.

Recommendations:

The Board noted the report.

73/21 ADMIN BULLETIN UPDATE [Item 9]

Witnesses:

Sally Wilson, Head of Data, Digital & Special Projects

Key points raised during the discussion:

1. The Head of Data, Digital & Special Projects introduced the report and stated that the bulletins had been included for members' information.

Actions/ further information to be provided:

None.

Recommendations:

The Board noted the report.

74/21 RISK REGISTER [Item 10]

Witnesses:

Sally Wilson, Head of Data, Digital & Special Projects

Key points raised during the discussion:

1. The Head of Data, Digital & Special Projects introduced the report and highlighted an update to risk 'F8' which provided detail on recruitment within the team and the transfer to XPS, which reduced the level of risk in this area.

Actions/ further information to be provided:

None.

Recommendations:

The Board noted the report.

75/21 ANY OTHER BUSINESS [Item 11]

There was none.

76/21 EXCLUSION OF THE PUBLIC [Item 12]

Resolved: That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information under the relevant paragraphs of Part 1 of Schedule 12A of the Act.

77/21 SURREY FIREFIGHTER PENSION SCHEME MIGRATION - PROJECT CLOSE REPORT [Item 13]

Witnesses:

Sally Wilson, Head of Data, Digital & Special Projects

Key points raised during the discussion:

1. The Part 2 report was introduced by officers. The Board asked a number of questions which were responded to by the officers present.

Actions/ further information to be provided:

None.

78/21 DATE OF THE NEXT MEETING [Item 14]

The Board noted the date of the next meeting as 13 January 2021.

Meeting ended at: 11.00 am

Chairman

SURREY LOCAL FIREFIGHTERS' PENSION BOARD ACTIONS AND RECOMMENDATIONS TRACKER

The actions and recommendations tracker allows Board Members to monitor responses, actions and outcomes against their recommendations or requests for further actions. The tracker is updated following each Board. Once an action has been completed, it will be shaded out to indicate that it will be removed from the tracker at the next meeting. The next progress check will highlight to members where actions have not been dealt with.

KEY			
	No Progress Reported	Action In Progress	Action Completed

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
17 January 2020 A1/20	Administration Update (1 September 2019 - 31 December 2019)	Pensions Administration will update the Board on the backdating of the contracting out certificate to 6 April 2000 - detailing the effect on National Insurance contributions and the Modified Pension Scheme.	Scheme Manager	As per FPS Bulletin 24 - September 2019 HMRC have now written to all FRAs with regards to backdating their FPS 2006 scheme contracting out certificate to 6 April 2000. This is to allow HMRC to process the refund of National Insurance Contributions and to correct the contracted-out status. In a few cases HMRC have informed FRAs that they do not currently have a valid contracting out certificate for the FPS 2006 and this will first need to be applied for and then backdated. The relevant form to complete has been sent to each FRA by HMRC and is form APSS155b. The backdating should be from 6 April 2000. HMRC goes on to confirm that 'a notice of intention or explanation must be given to all employees and recognised trade unions and the notice period of up to 3 months must have expired'. On the assumption that some form of consultation took place with employees following the ruling about backdating membership HMRC will accept that as having given the necessary notice of intention or explanation.	Ongoing

Item 5

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				<p>It has been confirmed that DCLG (now Home Office) consulted on changes to the scheme under the retained firefighters pension settlement consultation, so there is no need to issue anything further.</p> <p>In order to reduce the burden on FRAs with regards to providing information for these refunds to be made, it has been agreed with HMRC that only name, date of birth, NI number and period bought back needed to be provided. FPS Bulletin 2 and FPS Bulletin 3 provide more information. This topic was also covered at the special members refresher workshop [slides 52 and 53] to clarify that there was no discretion to not provide this information because it was needed for the HMRC GMP reconciliation project.</p> <p>July 2020: Weightmans are providing advice as part of other work given to them on Modified and 10% Scheme Allowances now we are ready to write back out to members.</p> <p>April 2021: Awaiting details of 2nd options exercise.</p> <p>July 2021: Follow up letters have been sent to members regarding the Modified extending the deadline for Expression of Interest Forms (EOI) to December 2021. This follows a number of enquires and requests for a second opportunity to express interest.</p> <p>October 2021: The period for members to submit their Expression of Interest Forms, remains open. Currently</p>	

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				<p>one form has been received. From January 2022, the calculations will be made and communicated accordingly to those who submit their EOI</p> <p>January 2022: The date for the Expression of Interest forms to be submitted by has now passed. At present there has not been an update from the Government as to when the Modified Scheme will reopen for pension members to join. Throughout 2021, a further 5 forms were received. All members who returned an Expression Of Interest form (103 people), will be contacted in January 2022 with an update.</p>	
<p>30 April 2020</p> <p>A16/20</p> <p>(Informal meeting due to Covid-19)</p>	<p>Action Tracker and Risk Register</p>	<p>A) Pensionable Pay particularly concerning Duty Systems will be added to the action tracker and key headlines and milestones from Weightmans regarding the project, will be shared with the Board once received.</p> <p>B) A risk to be added to the Risk Register concerning Pensionable Pay - particularly in relation to Duty Systems.</p>	<p>Scheme Manager</p>	<p>30/04/20 (informal meeting) - In response, the Vice-Chairman explained that she had approached Jane Marshall from Weightmans legal service who helped scope that work project, for a report. She noted that the Workforce Information Officer had recently chased a reply from legal colleagues who were not in receipt of Weightmans' report. The Vice-Chairman agreed that once the report was received, the Board would receive key headlines and milestones in relation to that project.</p> <p>July 2020: The Project Manager initiated work to look at the allowances to find out what the Surrey County Council situation looked like. He was mandated with a task to prioritise current members and gone back to Weightmans for further advice.</p> <p>An update on pensionable allowances was given to the November Board and a risk has been added to the risk register. The Scheme Manager update will provide the Board with regular updates.</p>	<p>Ongoing</p>

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				<p>April 2021: The Scheme Manager updated the Board on Pensionable Pay and reported that a new project manager was now in place so this and other projects could be taken forward through a Fire Pensions Programme Steering Group. A timeline for the Pensionable Pay project would be established. The Scheme Manager explained that the Steering Group would meet monthly and this Local Firefighters' Pensions Board would receive an update following each meeting.</p> <p>July 2021: Meetings in place and papers are being shared. The previous Project Manager has left. Recruitment is underway for a Senior Pension Advisor.</p> <p>October 2021: Following a recruitment process, two new members joined the Surrey Fire and Rescue Service. Both members have commenced working on 10% allowance project. Further resource is being sourced to complete the calculations for the 10% allowance project.</p> <p>January 2022: Calculations were completed in December 2022 for Priority Group 1 (SFRS members due to retire by end of 2023), and letters were sent to notify them of the 10% allowance and the impact this has had on their contributions. A total of 11 people were in this cohort. Calculations have also commenced for Priority Group 2 members (SFRS members who have retired between 2014 and 2020). Letters to this cohort are due to be sent by the end of January 2022.</p>	

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
30 April 2020 A19/20 (Informal meeting due to Covid-19)	Risk Register	The Pensions Support & Development Manager to provide an update to the Board on both short and long term solutions to resourcing FPS Pensions Administration. This would include the impact on the Modified Pension Scheme, Pensionable Pay and payment of scheme member benefits as a result.	Scheme Manager	Dec 2020: to be discussed at Jan 2021 meeting April 2021: A Pension Scheme Update is on the agenda for the LFPB. This is a standing agenda item, alongside the Risk Register. October 2021: Two new members joined the Surrey Fire and Rescue Pensions Team. Both members are working on the priority projects: 10% allowance, Age Discrimination and Modified projects, as well as other areas. XPS have taken over the role as Pension Administrators. Further resource is being sourced for two additional members to be part of the Surrey Fire and Rescue Pensions Team into 2022, to complete the calculations for the current priority projects. January 2022: The two further members have been working in the team for the past two months, whereby they have been completing the calculations for the 10% allowance project.	Ongoing
30 April 2020 A20/20 (Informal meeting due to Covid-19)	Administration Update (1 January 2020 - 31 March 2020)	The Pensions Support & Development Manager will liaise with the Head of Data, Digital & Special Projects on the next steps concerning the Guaranteed Minimum Pension (GMP) reconciliation - the new Project Manager to assist.	Head of Data, Digital & Special Projects	No major changes. At this stage Mercer, our outsource company dealing with GMP, is still awaiting final data cut for SFRS. We are expecting to receive the project plan for rectification in January 2021 so we can begin planning our side. April 2021: Reports sent to scheme manager for review and decisions regarding tolerance setting levels August 2021: Officers confirmed that a meeting on	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				<p>Guaranteed Minimum Pension (GMP) reconciliation was held with XPS to agree a timeline and arrange processes following the transfer over to XPS.</p> <p>October 2021: Mercer have provided a breakdown of the information they have completed to date which has been passed to XPS to obtain a quote to complete the GMP rectification project.</p> <p>January 2022: Communications are underway with Mercer and the payment for this service is in process.</p>	
22 April 2021 A5/21	Action Tracker	<p><i>The Board agreed to combine Actions A14/20 and A15/20 as they both related to Board Member training.</i></p> <p>The Board to regularly consider future training needs.</p>	Committee Manager	<p>November 2021 Update: For Head of Data, Digital & Special Projects to consider options for pensions training for Spring 2022.</p> <p>January 2022: The LGA have been contacted, and have confirmed they can provide training in March 2022. A date for the training to go ahead needs to be confirmed by the Board and the SFRS Pensions Project Team. The LGA also confirmed training on the age discrimination remedy will be facilitated as part of the LGA's remedy project implementation. Details of this and any other future events will be advertised via the monthly FPS bulletins. The Pensions Project Team will monitor the website accordingly.</p>	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
25 November 2021 A7/21	XPS Administration - Surrey Fire and Rescue Service Pension Board Report	For the Head of Data, Digital & Special Projects to work with XPS to use a tracing service to confirm addresses for those past retirement or within two years of retirement.	Head of Data, Digital & Special Projects	January 2022: Further updates are required from XPS on this as this is not something that is currently offered.	Ongoing
25 November 2021 A8/21	XPS Administration - Surrey Fire and Rescue Service Pension Board Report	For XPS to provide a continuing update on the clearing of outstanding tasks inherited in the transfer to XPS.	Head of Data, Digital & Special Projects	January 2022: The Pensions Project Team held a Service meeting with XPS on 29 November 2021. XPS confirmed the majority of cases have now been completed. There were 56 cases that have gone back to SFRS due to ongoing transfer queries. Some of these tasks have been outstanding for some time now but it is very positive that most have been completed now.	Ongoing
25 November 2021 A9/21	XPS Administration - Surrey Fire and Rescue Service Pension Board Report	For XPS to provide an update on the suggestions for improvements in the self-service portal, and on the help line backlog.	Head of Data, Digital & Special Projects	January 2022: Further information on this matter will be submitted by XPS.	Ongoing

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Surrey Local Firefighters' Pension Board 13 January 2022

Scheme Management Update Report

Recommendations:

The Board is asked to note the report and actions taken.

1.1 Introduction:

1.1 The Board has requested an update on Scheme management activities.

2.0 Scheme Management Activities

2.1 Age Discrimination – Immediate Detriment Remedy

2.2 On 8 November 2021, SFRS contacted 178 members who would be affected by the Immediate Detriment Framework (IDF), based on the Memorandum of Understanding (MOU) which was released on 8 October 2021. The communication to the members notified them that the Service was reviewing the processes involved in the IDF and would contact them again once a decision had been reached as to whether SFRS would be adopting the framework.

2.3 On 29 November 2021 Surrey Fire and Rescue Service (SFRS) received an update from the Local Government Association (LGA) to confirm that the Home Office had withdrawn its guidance on the IDF in relation to the McCloud/Sergeant case. This has meant any work to remedy those due to retire before 2023, will cease until further updates are provided. This is due to the Home Office noting that considerable risk, uncertainty and administrative burdens for individuals, schemes and employers would occur during the IDF process. Furthermore as the legislation is being worked through in preparation for its introduction in 2023, it has become apparent that some of the implications would only be tested in the court of law. Currently members affected by the McCloud/Sergeant case will only be remedied from October 2023 when the legislation comes into play.

2.4 The Service has noted the response from the Fire Brigade Union (FBU) to the retraction of the Immediate Detriment Framework, but is waiting for further guidance from the LGA and Nation Fire Chiefs Council (NFCC), before the 178 members are contacted again.

2.5 10% Pensionable Allowance

2.6 During the week commencing 13 December 2021, communications were sent to priority one members (Firefighters about to retire in the next 12 months). This cohort consisted of 13 people rather than the original 17 as the Service were notified of four firefighters who are not due to retire until 2024.

2.7 In terms of the 29 members in priority group 2, (Firefighters who have retired after 2014), the calculations have also been completed and the letters are due to be sent out at the start of 2022.

2.8 The Pensions Project Team have liaised with Surrey County Council's Finance and Payroll teams to ensure repayments of pension contributions owed can be processed accordingly. Meetings have also taken place with XPS Administration and further meetings have been scheduled to ensure member records will be updated.

2.9 At present the Pensions Project Team expect to complete the calculations and communicate to priority group 3 members (Deferred Members) in the first quarter of 2022.

2.10 10% Pensionable Allowances – IDRPs update

2.11 Three complaints were raised by members which have now reached stage 2 of the IDRPs process. Each of the three complainants have been sent a letter in December has been confirmed that of these complainants, 1 will be contacted as part of the priority group two communications. For the remaining complainants, their cases will be reviewed prior to issuing priority group three letters. It may be possible the affected complainants can be reviewed after the first priority group, but this cannot be guaranteed.

2.12 Modified Scheme – On-Call Access

2.13 The deadline for the Expression of Interest forms to be submitted to the Service by, has now passed. Presently, no further guidance has been provided by the Government as to when the firefighters pension scheme will reopen for the firefighters to join. From the 220 affected members, 102 forms have been received of which 99 are interested in joining the scheme. The Service will be communicating to members with an update, however we are unable to proceed further with this project until additional guidance has been received.

2.14 Training

2.15 Based on the action in the November 2021 Local Pensions Board Meeting, contact has been made with the LGA to arrange for training to take place again in Spring 2022. The training session will be for Board Members, Scheme Manager, the Senior Pensions Advisor and the Pensions Project Support Officer.

2.16 The Pension Regulator – “six processes” factsheet

2.17 The first FPS bulletin of 2021 included the release of the latest version of the Pension Regulator six processes factsheet. Based on the action from the November Local Pensions Board Meeting, the SFRS The Pensions Project Team will be working with the Board on this in early 2022.

2.18 Audit

2.19 The internal audit review took place on Monday 13 December 2021. The auditor was very pleased with the progress made to date and there are no further meetings scheduled. An update of the current active actions, need to be sent at six monthly intervals.

2.20 Risk Management

The Local Firefighters Pension Scheme (LFPS) Risk Register has been reviewed and is a standing agenda item on the LFPB

2.8 Summary

The Board is asked to note the update provided.

Report contact: Sally Wilson and Carrie Pearce

Contact details: E: sally.wilson@surreycc.gov.uk

E: carrie.pearce@surreycc.gov.uk

Sources/background papers: N/A

Annexes: N/A

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Surrey Local Firefighters' Pension Board 13 January 2022

FIRE BULLETINS

The Pensions Board has adopted a procedure to ensure that any FPS Bulletins released by LGA are reviewed and any necessary actions are noted and tracked through to completion.

Bulletins 51 and 52 (Annex 2) have been published since the last Board meeting.

1.1 Bulletin 51 informed FRA's that they are encouraged to respond to the Home Office Consultation by 2 January 2022. This opportunity is for FRA's to express their views on the amendments to the pension scheme regulations to deliver the first set of changes to remove the transitional protections from the PFS 2015. SFRS submitted its response on 22 December 2021.

The consultation to address the second set of changes to remedy the discrimination identified in the McCloud / Sergeant case will take place in 2022.

1.2 In Bulletin 51, readers were provided with an update on the Immediate Detriment Framework whereby on 19 November 2021, the [FBU and LGA published a joint statement](#) which included updates on the [HMRC's policy note](#) and Finances (No. 2) Bill.

Sample letters have been updated in the FPS Regs members area which will assist FRA's to administer the framework. They have not been endorsed by FPS but have been shared as examples of good practice.

1.3 In Bulletin 51, readers were reminded that the Home office withdrew its informal and non-statutory guidance ahead of processing certain kinds of immediate detriment ahead of the legislation which will be implemented in October 2023.

The Home Office also gave the following update on funding:

"I also want to take this opportunity to provide some further clarity in relation to the funding position. As the Government does not advise that immediate detriment cases should be processed in advance of the legislation coming into force, we will not be in a position to provide any additional funding for those costs which are paid outside of the pension account. These costs include payments that are not considered to be legitimate expenditure under the pension scheme regulations and any associated administration costs including any charges from your pension administrator. These will need to be funded locally by your fire and rescue authority from local budgets.

In relation to immediate detriment costs paid from the pension account in the course of processing pipeline cases, FRAs will need to ensure that these payments comply with the financing regulations of the pension scheme. If they are considered to be legitimate expenditure then they will be considered for payment as part of the established processes for claiming the AME top up grant.”

Whilst the guidance has been withdrawn, SFRS will continue to do some exploratory work in this area such as preparing project timelines for tasks to complete, ensuring communications are drafted, and calculating top level costs involved in the project. SFRS will liaise with XPS to identify if any work can be carried out in the interim.

1.4 Bulletin 51 also informed readers that the FPS has collaborated with the Fire Communications Working Group to develop a suite of letters for FRA's to use ahead of the prospective remedy implementation on 1 April 2022. These letters will explain to protected members the effect of moving to the FPS 2015 scheme in April 2022 as well as updating those not affected by the changes. SFRS will liaise with XPS to confirm if they will be sending letters on our behalf.

1.5 Bulletin 51 also informed readers the guide to combine pension scheme service has been updated with new and amended definitions. These can be found on the FPS regulations website. The FPS has also updated their A to Z list of pension terms. This can be located on the members area of the FPS Regulations website and will be a useful tool for the SFRS pensions team.

1.6 Bulletin 51 highlighted HMT formally introduced Finance (No 2) Bill 2021/2022 to Parliament. There are several provisions which may change the administration of the Firefighters Pension Scheme:

Clause 9: Changes to annual allowance scheme pays deadlines

This clause changes deadlines associated with mandatory scheme pays. The period within which some members must give notice of their election will be extended. The deadline for administrators to provide information about annual allowance tax charges will also change.

Clause 11: Tax impacts resulting from the McCloud remedy

The clause provides HMT with the power to make regulations to address tax impacts that arise because of implementing the McCloud remedy. Provisions made under this section may be retrospective and may be different for different member types. The changes will have effect from 6 April 2022 or later.

1.7 Proposed amendments to the PSPJO Bill were also included in Bulletin 51. Readers were advised to follow the changes in the [marshalled list of amendments](#) and to follow [the progress of the PSPJO Bill](#) on the UK Parliament website.

1.8 The bulletin highlighted Unions have launched a judicial review against HMT around the McCloud/Sergeant remedy costs in the cost control mechanism. The FBU, GMB, and BMA feel the cost to resolve the discrimination should not be funded by scheme members.

1.9 The Pensions Ombudsman (TPO) is seeking FRA's views on how they think it is doing and where it can improve things. SFRS completed the Stakeholder Survey on 3 December 2021.

1.10 Bulletin 51 included an update on the HMRC newsletter 135 which contained important updates and guidance for schemes. The HMRC newsletter includes articles on:

- Relief at source
- Pension scheme migration
- Accessing your business tax account
- Annual allowance charge — members declaring their annual allowance charge on their Self-Assessment tax return
- Accounting for tax return

1.11 Bulletin 51 advised readers that new responses have been provided by the Government in relation to pension scams and pension transfers:

- Response to pension scams: [empowering trustees and protecting members consultation](#)
- [Occupational and Personal Pension Schemes \(Conditions for Transfers\) Regulations 2021 \[SI 2021/1237\]](#)
- [TPR Guidance on dealing with transfer requests](#), which includes a helpful flowchart setting out the transfer process.

The regulations took effect from 30 November 2021. The regulations give pension managers and administrators tools to act if they have suspicions about the circumstances that have led the member to request a transfer. The member will no longer be able to insist on a statutory transfer taking place in these circumstances which is something that XPS and SFRS are monitoring and will treat with caution if this is requested.

1.12 The bulletin included an update that the HMRC published a Pension Schemes manager newsletter which included information as to how to prepare to migrate pension schemes to the Manage Pension Scheme Service. SFRS pension team has recently registered with HMRC to use this service.

1.13 Additionally Bulletin 51 confirmed how the HMRC needs to receive scheme data for pensions savings statements, scheme reports, annual allowance and lifetime allowance. SFRS pension's team are aware of these processes and the deadline of 31 January 2022 for the information to be submitted by.

2.1 Whilst Bulletin 52 was a very brief bulletin, it confirmed the SAB, FRA remedy [self-assessment survey results](#) are now available. The SAB were quoted to confirm the survey provided them with 'insights into the current administration arrangements and the challenges being faced by FRAs, in the light of both business as usual and remedy based challenges'. The SAB secretariat will be sending a copy of our results along with the main results so we can benchmark where we are, which will be particularly insightful for the SFRS pensions team. The SAB have also noted the results have enabled them to make a number of recommendations in areas including future administration arrangements and for individual elements of remedy, namely data; contributions; processes; information, communications and coordination; knowledge, capability and capacity. The SAB also noted they aim to assist with the communications challenges and will be making available a series of generic scenarios and videos to assist FRA's.

2.2 Bulletin 52 also highlighted the SAB has written a [letter to the HM Treasury](#) on the withdrawal of the Immediate Detriment guidance, to request information on the risks and uncertainties which were raised in their assessment.

2.3 The Pensions Dashboard Programme has published its [December newsletter](#) providing links to reflections on programme activity in 2021, confirmation of three potential dashboard providers, and Pensions Administration Standards Association guidance on data matching.

2.4 Bulletin 52 also confirmed The Pensions Ombudsman (TPO) has published some useful resources on its website for service users including:

- [Unacceptable behaviour policy](#)
- [Accessibility policy](#)
- [Determination factsheet](#)

Bulletin Update contact: Sally Wilson and Carrie Pearce

Contact details: E: sally.wilson@surreycc.gov.uk

E: carrie.pearce@surreycc.gov.uk

Annexes

Annex 1: FPS Bulletin 51

Annex 2: FPS Bulletin 52



FPS Bulletin 51 – November 2021

Welcome to issue 51 of the Firefighters' Pensions Schemes bulletin. We hope that readers remain safe and well.

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 or suggested items for future issues, please email claire.hey@local.gov.uk.

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Calendar of events

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

Table 1: Calendar of events

Event	Date
FPS coffee morning	7 and 21 December 2021
Eversheds Sutherland pensions conference	1 December 2021
Eastern regional group	7 December 2021
SAB	9 December 2021
North East regional group	16 February 2021

FPS

Home Office consultation: Amendments to the FPS in England 2022

On 8 November 2021, the Home Office launched a consultation on the amendments to the pension scheme regulations to deliver the first set of changes to remove the transitional protections from the FPS 2015.

These changes enact the policy announced in February of this year and are consequential to the provisions in the [Public Service Pensions & Judicial Offices Bill](#) (PSPJO) currently before Parliament. The changes are intended to come into force on 1 April 2022.

This is part of the package of measures that the government is undertaking to remove the discrimination identified by the courts in the McCloud and Sargeant cases. The second phase will address the issue of giving members a retrospective choice of benefits for the remedy period. The Home Office will consult on this separately next year.

Please find details of the consultation and associated documents at the link here:

[Amendments to the firefighters' pension schemes in England 2022 - GOV.UK](https://www.gov.uk/government/consultations/amendments-to-the-firefighters-pension-schemes-in-england-2022)
(www.gov.uk)

The consultation is open until Sunday 2 January 2022.

As it will be for individual Fire and Rescue Authorities (FRAs) as the Scheme Manager to apply the regulations, FRAs are encouraged to respond to the consultation.

Immediate Detriment Framework updates

On 19 November 2021, the [FBU and LGA published a joint statement](#) to update colleagues on the impact of [HMRC's policy note](#) of 27 October 2021 and the [Finance \(No.2\) Bill](#).

The guidance to FRAs available on the [age discrimination page](#) of the FPS Regulations and Guidance website has been updated accordingly. Log-in details are required to access the page and can be provided to practitioners and administrators only.

Sample letters to assist FRAs in administering the Framework have also been added to this page. Please note that these letters have not been developed by the communications group and are not endorsed but have been shared by FRAs/ administrators as examples of good practice and to reduce duplication of work. Some cases may require additional information or slightly alternative information to be added / amended on an ad-hoc basis.

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On 29 November 2021, we wrote to FRAs and other stakeholders to tell them that the [Home Office has withdrawn its informal and non-statutory guidance](#) on processing certain kinds of immediate detriment case ahead of legislation, with immediate effect. All versions of the guidance have been removed from the FPS Regulations and Guidance website.

The Home Office also gave the following update on funding:

“I also want to take this opportunity to provide some further clarity in relation to the funding position. As the Government does not advise that immediate detriment cases should be processed in advance of the legislation coming into force, we will not be in a position to provide any additional funding for those costs which are paid outside of the pension account. These costs include payments that are not considered to be legitimate expenditure under the pension scheme regulations and any associated administration costs including any charges from your pension administrator. These will need to be funded locally by your fire and rescue authority from local budgets.

In relation to immediate detriment costs paid from the pension account in the course of processing pipeline cases, FRAs will need to ensure that these payments comply with the financing regulations of the pension scheme. If they are considered to be legitimate expenditure then they will be considered for payment as part of the established processes for claiming the AME top up grant.”

We appreciate that this may be a cause of concern to colleagues who are considering to adopt or who have adopted the [MoU and Framework](#). We are considering the various aspects within the note and will write to FRAs and FRSs with further information as soon as possible.

[Age discrimination remedy - member letters 1 April 2022](#)

Under the communications pillar of the LGA’s remedy [Project Implementation Document](#) deliverables, we said that we would provide communications to explain the effect of protected members moving to FPS 2015 with effect from 1 April 2022 and communications to members not affected by the changes to benefits.

A suite of letters has been developed in collaboration with the Fire Communications Working Group. These can be given by FRAs to scheme members ahead of prospective remedy implementation on 1 April 2022. This includes a tailored version for each member cohort: protected, taper protected, unprotected, and out of scope.

The letters are available on the new [prospective remedy page](#) of the FPS Regulations and Guidance website.

Guide to combining pension scheme service updated

The guide to combining pension scheme service in the FPS has been updated with new or amended definitions of remedy membership cohorts.

We have also replaced references to the “modified scheme” with the correct terminology of FPS 2006 special members/ membership, ahead of the anticipated second options exercise, to make sure that we are using consistent wording in all documents.

Clean and tracked versions of the guide can be found on our [guides and sample documents webpage](#) under the ‘Aggregation’ heading.

A to Z of pension terms updated

As part of our ongoing development of the FPS Member website, the [A to Z of pensions terms](#) page has been expanded significantly. We welcome any suggestions for additional content that would be useful to increase understanding of pensions terminology. Please email bluelightpensions@local.gov.uk.

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.

Queries have been answered this month in the following categories: combining service (page 17). Queries from earlier months have been grey shaded to differentiate from new items.

Please bear with us if you experience a delay in response to your technical query. As you can imagine, much of our resource is currently focused on remedy-related issues.

As a reminder, the recently reinstated [Knowledge Hub technical forum](#) can be used as an alternative, if you need an informal steer from sector colleagues in the meantime. See [FPS Bulletin 47 – July 2021](#) for more information.

FPS England SAB updates

SAB SMA committee vacancy

We have a vacancy on the [Scheme Management and Administration \(SMA\) committee](#) for an FRA LPB representative. The main objectives of the committee are to provide guidance to the SAB to understand the value and cost of administration and to consider how scheme managers and administrators can best be supported by identifying best practice.

This is a great opportunity for an LPB member to get more involved with governance at a national level and represent the views of the sector.

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The required commitment is usually three to four meetings per year, and these are currently being held virtually. If you are interested in sitting on the committee or would like more information, please email bluelight.pensions@local.gov.uk.

Other News and Updates

Finance (No.2) Bill 2021/22

On 2 November 2021, HM Treasury (HMT) formally introduced the Finance (No.2) Bill 2021/22 to Parliament. The Bill includes several provisions that may affect the administration of the FPS.

Clause 9: Changes to annual allowance scheme pays deadlines

This clause changes deadlines associated with mandatory scheme pays. The period within which some members must give notice of their election will be extended. The deadline for administrators to provide information about annual allowance tax charges will also change.

Clause 11: Tax impacts resulting from the McCloud remedy

The clause provides HMT with the power to make regulations to address tax impacts that arise because of implementing the McCloud remedy. Provisions made under this section may be retrospective and may be different for different member types. The changes will have effect from 6 April 2022 or later.

You can follow the [progress of the Finance \(No.2\) Bill 2021/22](#) on the UK Parliament website.

Proposed amendments to the PSPJO Bill

Amendments to the PSPJO Bill have been proposed. You can read the proposed changes in the [marshalled list of amendments](#). You can follow the [progress of the PSPJO Bill](#) on the UK Parliament website.

Legal challenge: remedy costs and cost control mechanism

Unions across the public sector have launched a judicial review against HMT about including McCloud/ Sargeant remedy costs in the cost control mechanism. The FBU, GMB, and BMA argue that the cost of rectifying the discrimination should not be met by scheme members.

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.

Pension scams: new restrictions on transfers

On 8 November 2021:

- the Government published its [Response to Pension scams: empowering trustees and protecting members consultation](#)
- [The Occupational and Personal Pension Schemes \(Conditions for Transfers\) Regulations 2021](#) [SI 2021/1237] were laid
- the Pensions Regulator (TPR) published [TPR guidance on dealing with transfer requests](#), which includes a helpful flowchart setting out the transfer process.

The regulations take effect from 30 November 2021. They introduce further legal restrictions on a member's statutory right to transfer. The regulations give pension managers and administrators tools to act if they have suspicions about the circumstances that have led the member to request a transfer. The member will no longer be able to insist on a statutory transfer taking place in these circumstances.

PDP November newsletter

The Pensions Dashboards Programme (PDP) has published its [November newsletter](#). The newsletter includes links to:

- the PDP director's blog reflecting on recent achievements and looking forward to activity in the next few months
- the October progress update report
- dashboard providers' update, and confirms that successful applicants to help test the pensions dashboards ecosystem will be announced in December
- the identity hub which provides information about the approach to procuring an identity service
- the technical glossary which includes definitions of key terminology.

TPO stakeholder survey

The Pensions Ombudsman (TPO) is seeking your views on how you think it is doing and where it can improve things. TPO would be grateful if you could complete the [Stakeholder survey](#) which is open until Wednesday 8 December 2021.

One of TPO's strategic goals is to support and influence the pensions industry and the wider alternative dispute resolution sector to deliver effective dispute resolution. Your feedback is important as it will help to shape TPO's future planning, identify areas for improvement and improve the complaints process for its customers.

HMRC

HMRC newsletters/bulletins

On 30 November 2021, HMRC published [Pension schemes newsletter 135](#) containing important updates and guidance for schemes. The newsletter includes

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articles on:

- Relief at source
- Pension scheme migration
- Accessing your business tax account
- Annual allowance charge — members declaring their annual allowance charge on their Self Assessment tax return
- Accounting for tax return

Managing Pension Schemes service

On 18 November 2021, HMRC published a [Managing Pension Schemes newsletter](#) and new [GOV.UK guidance](#) with information on the new feature available on the Managing Pension Schemes service. These also include information on how to prepare to migrate your pension schemes to the Managing Pension Schemes service.

Pension scheme administrators can now view a list of schemes they need to migrate to the Managing Pension Schemes service. Currently it's a 'read only' list. You won't be able to migrate any pension schemes at this point. Only schemes with a status of 'open' on the Pension Schemes Online service will be included in the list.

To view the list of schemes, you'll need to be [enrolled on the Managing Pension Schemes service](#) using your existing 'A0' administrator ID. Scheme administrators with [multiple administrator IDs](#) will need to have completed the process of setting up their 'Master' and 'Ancillary' IDs, and have enrolled using their 'Master' ID.

HMRC will continue to keep you updated on the Managing Pension Schemes service through their [Pension Schemes Newsletters](#).

Please email migration.mps@hmrc.gov.uk if you have any further questions or feedback on the Managing Pension Schemes service, including the migration of pensions schemes.

2020/21 Event Reporting - Annual Allowance Statements and Lifetime Allowance

As last year, HMRC is prepared to accept scheme data regarding pension savings statements for 2020/21 from PCM customers on an excel spreadsheet rather than through the scheme's Event Report. All other scheme events for 2020/21, with the exception of the lifetime allowance protection regimes (see below), must be submitted via Pensions Online.

This concession is on the clear understanding that the pension savings statement data represents part of the scheme's formal reporting obligations for the 2020/21 Event Report. The data must be submitted by 31 January 2022 and HMRC reserves the right to open enquiries based on any of the pension savings statement information provided.

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The data required for each member is:

- Name of Member (Title, First Name, Surname)
- National Insurance Number of Member
- Aggregate Pension Input Amounts for the scheme (x)
- Tax Year Ending (that the information relates to)
- Have you provided this member with a pension savings statement under regulation 14A(1)(b)(ii) SI 2006/567? (Y/N) (Money Purchase Pension Savings Statement)
- If Yes, provide the Aggregate Pension Input Amounts for Money Purchase Arrangements (y)

All fields must be completed. For members who have both x & y above, it would be helpful if you list the data in the same line on the spreadsheet.

Guidance is included at [HMRC Pensions Tax Manual 161600](#) and [HMRC Pensions Tax Manual 167000](#)

For the data to be compatible with HMRC's IT systems it must be submitted on a Microsoft Excel spreadsheet encrypted via Winzip.

All files should be sent via e-mail to pensions.businessdelivery@hmrc.gov.uk and your PCM copied in. HMRC will notify the scheme of receipt to enable the password to be provided under separate cover.

Lifetime Allowance

You may recall from last year that, in accordance with article 6.2 of the [Pension schemes newsletter 85 - March 2017](#), the Event Report has not yet been amended to include lifetime allowance protections that members applied for online. If you need to submit these details to HMRC, you can also submit them on a password protected spreadsheet and send the password in a separate email.

You should put 'Lifetime allowance – Event Reporting' in the subject line of your email and send this to pensions.businessdelivery@hmrc.gov.uk and, again, copy in your PCM. This data must also be provided by 31 January 2022.

If a scheme chooses to use this facility to provide this information, it is entirely at the scheme's own risk. HMRC accept no responsibility of loss, interception, or corruption until data is delivered safely to them.

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.

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The next session is due to take place on 7 December 2021.

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

[9 November 2021 – FRA remedy self-assessment survey](#)

[23 November 2021 – Immediate Detriment Framework update - UPCs](#)

An [FPS coffee mornings page](#) has been added to the Events menu of the FPS Regulations and Guidance website to hold previous presentations.

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

Legislation

SI	Reference title
2021/1237	The Occupational and Personal Pension Schemes (Conditions for Transfers) Regulations 2021

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](#)
- [Welsh Government Fire circulars](#)

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Contact details

Claire Hey (Senior Pension Adviser)

Telephone: 07825 731 924

Email: claire.hey@local.gov.uk

Kevin Courtney (NPCC Pensions Adviser)

Telephone: 020 7664 3202

Email: kevin.courtney@local.gov.uk

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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 bluelight.pensions@local.gov.uk.

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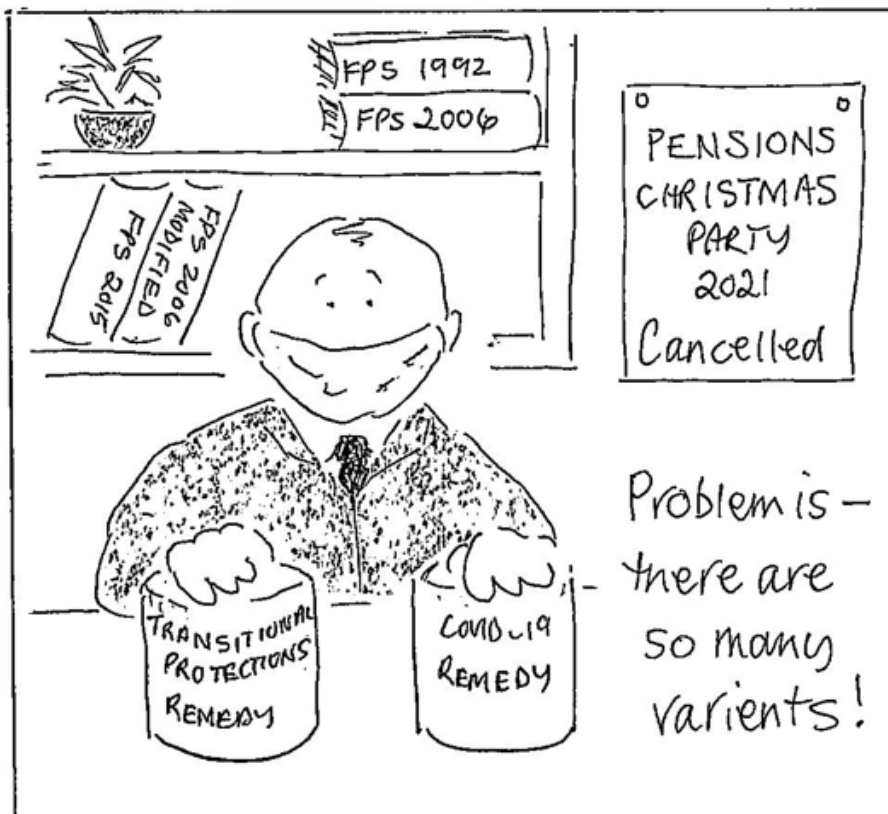
FPS Bulletin 52 – December 2021

Welcome to issue 52 of the Firefighters' Pensions Schemes bulletin.

We hope that readers remain safe and well. We would like to offer our thanks to all colleagues for their help and support during what has been another challenging year.

In finest December bulletin tradition, Eunice Heaney has kindly provided an illustration perfectly capturing some of the challenges we've faced and are continuing to face.

We wish all readers a very merry Christmas and happy New Year.



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 or suggested items for future issues, please email bluelight.pensions@local.gov.uk.

In a new test feature this month, we bring you details of two job vacancies within the UK FPS community. If you have a job you would like to advertise in the bulletin, please email bluelight.pensions@local.gov.uk.

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Calendar of events

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

Table 1: Calendar of events

Event	Date
FPS coffee morning	11 and 25 January 2022
North East regional group	16 February 2021
LGA Annual Fire Conference and Exhibition	15 – 16 March 2022
SAB	24 March 2022
SAB	23 June 2022
SAB	8 September 2022
SAB	8 December 2022

FPS

Immediate Detriment Framework update

Readers will be aware that on 29 November 2021 the Home Office withdrew its informal and non-statutory guidance on processing certain kinds of immediate detriment case ahead of legislation, with immediate effect. That withdrawal was accompanied by an HM Treasury note and Home Office statement on funding.

The Immediate Detriment Framework guidance to FRAs available on the [age discrimination page](#) of the FPS Regulations and Guidance website has been updated. Log-in details are required to access the page and can be provided to practitioners and administrators only.

If you are taking decisions on immediate detriment cases following the withdrawal of the guidance, you should speak to your FRA's Nominated Contact.

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.

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FPS England SAB updates

[FRA remedy self-assessment survey research report and Chair's Christmas message](#)

We are pleased to bring you this year-end message from Joanne Livingstone, chair of the FPS England Scheme Advisory Board, which announces the publication of the outcomes of the FRA remedy self-assessment survey:

“Dear friends & colleagues,

The Scheme Advisory Board (SAB) is pleased to be able to share with you the results of the survey undertaken by the SAB secretariat in order to provide us with insights into the current administration arrangements and the challenges being faced by FRAs, in the light of both business as usual and remedy based challenges.

[FRA remedy self-assessment survey research report](#)

We would like to thank you all for engaging with the survey and making the time to share your plans and thoughts with us. You will see that this has led to recommendations being made for both the SAB and other stakeholders. There are a number of recommendations in each of the key areas of future administration arrangements and for individual elements of remedy, namely data; contributions; processes; information, communications and coordination; knowledge, capability and capacity.

The SAB is well aware of the challenges and amount of work required to implement the various remedies and we expect that this risk will be prominent in your corporate risk registers. The SAB secretariat will be sending your individual responses to you, to benchmark against the overall average and we hope that this will help you to identify any areas for further focus to ensure that all FRAs have full project plans for the different teams required.

With regard to the communication challenges, the SAB hopes to provide assistance by making available a range of generic scenarios and some information videos in the coming months. Our committees have been busy working on this and are also looking at ways to ensure that the information resources are reaching the right people. All feedback is very welcome.

We know from the survey that the ticking timeclock is a concern. It does not seem a full year since I penned my first Christmas letter to you but we are already approaching the festive season so I thought I would also use this opportunity to reflect a little on the year's work. The year has been dominated by consultations and, in most but not all matters, their outcomes. The predominantly new Home Office pensions team has provided considerable engagement. We have all spent time considering the topics of remedy, 2016 valuations, and future valuation methodology for the cost cap and funding purposes. Meanwhile the pandemic has continued, though we are hoping that the main SAB meetings will be able to start to have a physical meeting element.

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There have been changes in the SAB membership during the year. And, of course, you will also be aware of the departure of Clair Alcock to be Head of Police Pensions and the promotion of Claire Hey to be our Senior Adviser. This has left the Bluelight Team temporarily reduced in numbers and I would particularly like to thank Claire for working so hard to fill the void. I look forward to welcoming the new recruits when they are on board.

I would like also to thank my fellow SAB members, the SAB committee Chairs and all those involved in the Fire Pension committees, for their invaluable contributions and impressive knowledge and willingness to work through the issues.

So happy reading of the survey and best wishes to you all for the festive season.

Joanne Livingstone. Chair, English Firefighters' Pension Scheme Advisory Board"

Open letter from SAB to HMT on withdrawal of ID guidance

On 29 November 2021, the Home Office withdrew its informal and non-statutory guidance on processing certain kinds of immediate detriment case ahead of legislation, with immediate effect. The decision to withdraw the guidance was indicated as being based on [HM Treasury's best assessment on the advisability of processing immediate detriment cases](#).

The Board has written an [open letter to HM Treasury on the withdrawal of the guidance](#) to request more information on the risks and uncertainties mentioned in their assessment.

SAB SMA committee vacancy

The Board continues to carry a vacancy on the [Scheme Management and Administration \(SMA\) committee](#) for an FRA LPB representative. The main objectives of the committee are to provide guidance to the SAB to understand the value and cost of administration and to consider how scheme managers and administrators can best be supported by identifying best practice.

This is a great opportunity for an LPB member to get more involved with governance at a national level and represent the views of the sector.

The required commitment is usually three to four meetings per year, and these are currently being held virtually. If you are interested in sitting on the committee or would like more information, please email bluelight.pensions@local.gov.uk.

Other News and Updates

Appointment to the Bluelight Team

Following a successful recruitment campaign, we are delighted to announce that Claire Johnson has been appointed to the Bluelight Team in the role of Firefighters' Pensions Adviser (Employers) and will join the LGA on 24 January 2022.

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Claire has 12 years' public service pension experience, in the LGPS and Firefighters' Pension Schemes. Claire commenced Local Government employment in 2010 at West Yorkshire Pension Fund, before moving to West Yorkshire Fire and Rescue Service in 2016 where she has undertaken the role of Pensions Manager.

Claire's role at the LGA is to provide support to FRAs and FPS practitioners. In addition, Claire will lead the development of national FPS communications.

Vacancy at West Yorkshire Fire and Rescue Service

Claire's arrival at the LGA leaves a vacancy for a Pensions Manager at West Yorkshire FRS. You can find out more about the role on the [WYFRS careers webpage](#).

The closing date for applications is 16 January 2022 and interviews will take place week commencing 24 January 2022.

Claire would be happy to have an informal chat with anybody interested in the role, please email claire.johnson@westyorkfire.gov.uk to organise this.

Vacancy at North Wales Fire and Rescue Service

Please find below details of a current vacancy for Senior Pensions Officer which is open to existing North Wales FRS employees and external applicants. The closing date for receipt of application forms is 12.00 noon on 14 January 2022.

[Advert for Senior Pensions Officer](#)

[Recruitment information pack for Senior Pensions Officer](#)

The application form can be found on the [Current Vacancies](#) page of the North Wales FRS website.

PDP December newsletter

The Pensions Dashboards Programme (PDP) has published its [December newsletter](#). The newsletter includes links to:

- the PDP director's blog reflecting on programme activity over 2021
- a press release confirming the selection of three potential dashboard providers
- the Pensions Administration Standards Association (PASA) guidance on data matching
- the monthly technical newsletter from the PDP's technical architecture team.

New TPO resources

The Pensions Ombudsman (TPO) has published the following resources for service users on its website:

- [Unacceptable behaviour policy](#)
- [Accessibility policy](#)
- [Determination factsheet](#)

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HMRC

Enrolment on MPS

HMRC have recently been in touch with the Bluelight team to encourage FRAs who may be having difficulty enrolling on the Managing Pension Schemes (MPS) service to use the step-by-step guide that was issued to them by email on 25 August 2021. A copy can be provided on request – please email bluelight.pensions@local.gov.uk.

If authorities are still experiencing difficulties, they should email john.curtis@hmrc.gov.uk to arrange a call to talk through the process.

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 last session of the year took place on 21 December 2021. We will reconvene on 11 January 2022.

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

[21 December 2021 – Christmas coffee morning](#)

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

Legislation

SI	Reference title
2021/1308	The Occupational Pensions (Revaluation) Order 2021
2021/1319	The State Pension Debits and Credits (Revaluation) Order 2021
2021/1320	The State Pension Revaluation for Transitional Pensions Order 2021
2021/1394	The Pension Schemes Act 2021 (Commencement No. 5) Regulations 2021

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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 Pension Adviser)

Telephone: 07825 731 924

Email: claire.hey@local.gov.uk

Kevin Courtney (NPCC Pensions Adviser)

Telephone: 020 7664 3202

Email: kevin.courtney@local.gov.uk

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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 bluelight.pensions@local.gov.uk.

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Risk Ref.	Risk Description	Risk Owner	Inherent Risk					Control actions	Action by whom	Residual risk					Reviewed on		
			Impact				Total risk score			Impact				Total risk score			
			Fin	Service	Rep'n	Total				Likely	Fin	Service	Rep'n			Total	Likely
F1	Incorrect data due to employer error, user error or historic error leads to service disruption e.g. incorrect annual benefits statements being processes. Data not secure or appropriately maintained.	SW	2	4	5	11	2	22	TREAT 1) Implementation and monitoring of a Data Improvement Plan by the pension administration team. 2) The Board will be made aware of the 2020 data scores. The service will work with Pensions Admin on improving the data in the system and make recommendations.	TL/CC & XPS	2	3	3	8	2	16	Jul-21
F2	Risk of manual intervention in administration reporting. No manual intervention day to day outside of the project e.g. Miskey errors.	SW	2	4	2	8	3	24	TREAT 1) Automated extraction of data where viable and agreed process for audit assurance.	TL/CC	2	3	2	7	3	21	Jul-21
F4	Failure to communicate adequately and timely with scheme members	CP/PJ	2	4	4	10	3	30	TREAT 1) Ensure the website is updated, that newsletters are published and annual benefit statements when due to be communicated. 2) Develop a COMMS strategy for scheme members in relation to scheme changes 3) Pensions SharePoint Site 4) Pension Admin to send out ABS 5) Communicated with Members the new LGA pensions website 6) Members self-service	PJ / CP	2	4	4	10	1	10	Oct-21
F5	Failure to recognise and manage conflicts of interests of Board members	Dem serv/LFPB Chair	1	1	5	7	3	21	TREAT 1) Declaration of interests at the beginning of each meeting.	Dem serv	1	1	5	7	1	7	Jul-21
F6	LFPB Policies and strategies not in place or reviewed.	LFPB Chair	2	2	3	7	3	21	TREAT 1) Reviewed by the Board 2) Ensure roles and responsibilities are clarified.	LFPB	2	2	3	7	2	14	Jul-21
F8	The lack of available skilled resources coupled with the absence of a coordinated training plan to address knowledge gaps, results in inefficiencies in Pension Admin.	SW	3	4	4	11	3	33	TREAT 1) Project has completed to transfer pension administration to a third party. expected transfer date is September 2021. 2) Migration to XPS who do have this knowledge will continue to process key cases using the 2 bank staff we have retained to work on fire. 3) Recruitment has completed and a Senior Pension Advisor and Project Support Officer have now joined the Service	XPS / PJ / CP	3	4	4	11	2	22	Oct-21
F9	Failure to administer the scheme in line with regulations and policies, compliance towards regulations and assurances need to be built in to ensure the pension scheme is administered in line with current in force regulation and policy.	SW	2	2	4	8	4	32	TREAT 1) Up to date knowledge through various sources such as SAB and the LGA. Up to date training. Attendance at regional fire administrator working groups. Information on the scheme is held on the Firefighters website. 2) Through strong governance arrangements and the active reporting of issues, seek to report all breaches as soon as they occur in order to allow mitigating actions to take place to limit the impact of any breaches. 3) LGA local pension training undertaken on 17/03/2021 4) Training log in place and TPR toolkit completed by all Board Members	SW / PJ / CP	2	2	4	8	2	16	Oct-21
F9i	Failure to notify staff of the Modified Pension Scheme means the employer and employee has to collect contributions and make contribution shortfalls.	SW	3	2	4	9	4	36	TREAT 1) Officers to report to the Board. 2) Legal advice has been received. Contact has been made with members. 3) Awaiting further communications regarding second options exercise. 4) Letters have gone out to members who returned an expression of interest form and to those that did not respond. Response deadline December 2021.	TL/CC	3	2	4	9	4	36	Oct-21

