

Notice of Meeting

Surrey Local Firefighters' Pension Board

**Date & time**

Thursday, 10
November 2022 at
10.00 am

Place

Committee Room,
Woodhatch Place, 11
Cockshot Hill, Reigate,
Surrey, RH2 8EF

Contact

Joss Butler
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RH2 8EF
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Chief Executive

Joanna Killian

Elected Members

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

Independent Representatives:

Paul Bowyer (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: 28 JULY 2022

(Pages 5
- 8)

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 (4 November 2022).
2. The deadline for public questions is seven days before the meeting (3 November 2022)
3. The deadline for petitions was 14 days before the meeting, and no petitions have been received.

5 SURREY FIREFIGHTERS' PENSION BOARD ACTION AND RECOMMENDATION TRACKER

(Pages 9
- 16)

To note the action and recommendation tracker.

6 SCHEME MANAGEMENT UPDATE REPORT

(Pages
17 - 24)

The Board has requested an update on Scheme management activities.

7 XPS - SURREY FIRE & RESCUE AUTHORITY PENSION BOARD REPORT

(Pages
25 - 38)

To consider the report for 2022/2023 – Q2.

8 FIRE BULLETINS

(Pages
39 - 92)

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.

9 RISK REGISTER

(Pages
93 - 98)

To note the Risk Register.

10 DATE OF THE NEXT MEETING

To note the date of the next meeting as 24 February 2023.

**Joanna Killian
Chief Executive**

Published: 2 November 2022

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Thank you for your co-operation

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MINUTES of the meeting of the **SURREY LOCAL FIREFIGHTERS' PENSION BOARD** held at 10.00 am on 28 July 2022 at Committee Room.

These minutes are subject to confirmation by the Committee at its meeting on Thursday, 10 November 2022.

(* present)

Elected Members:

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

21/22 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS [Item 1]

None received.

The Chairman welcomed Paul Bowyer to the board. The Chairman also informed the board that he had written to Richard Jones to thank him for his years of service on the Surrey Local Firefighters' Pension Board.

22/22 MINUTES FROM THE PREVIOUS MEETING: 28 APRIL 2022 [Item 2]

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

23/22 DECLARATIONS OF INTEREST [Item 3]

None received.

24/22 QUESTIONS AND PETITIONS [Item 4]

There were none.

25/22 SURREY LOCAL FIREFIGHTERS' PENSION BOARD ACTIONS AND RECOMMENDATIONS TRACKER [Item 5]

Key points raised during the discussion:

1. The Chairman introduced the report.
2. Members agreed to close Action A2/22.
3. The Scheme Manager agreed to review the actions included on the tracker, including those related to the 10% allowance and age discrimination, to condense and reorganise where appropriate.

Recommendations:

To note the actions tracker.

26/22 SCHEME MANAGEMENT UPDATE REPORT [Item 6]

Officers:

Sally Wilson, Scheme Manager

Key points raised during the discussion:

1. The Scheme Manager introduced the report and made the following comments:
 - a. That the focus over the last few months was around age discrimination and looking to get additional information with regard to immediate detriment. The service was currently in a holding position as the Local Government Authority (LGA) had put forward the Memorandum of Understanding but then later had it withdrawn. Other Fire & Rescue Authorities were noted to be in the same position. Further details are included within the report.
 - b. In regard to the 10% pensionable allowances, the service was engaging with conversations with the Fire Brigade Union (FBU) to look into how to resolve and move the allowances forward. Officers were currently awaiting comments from the FBU. Further details are included within the report.
 - c. The report included an update on the Pension Regulator – “six processes” factsheet. The Chairman asked that the board be provided with an update on this annually.
 - d. Noted that the internal auditing team at Surrey County Council had commenced an audit on the contract between XPS Administration and Surrey Fire and Rescue.
 - e. Noted detail related to pension scheme resources as noted in the report.
2. In regard to age discrimination, a member of the board asked whether the service was in contact with other Fire & Rescue Authorities that were continuing to go down the route of applying the immediate detriment and learning how they were controlling risks. The Scheme Manager explained that it was mostly the smaller schemes that were moving forward and so had less risk due to their size. The member of the Board requested a list be circulated of the authorities continuing to apply immediate detriment and of those that were not.
3. In regard to 10% Pensionable Allowance, the Chairman asked for confirmation on the number of priority groups and members within each group. The Scheme Manager agreed to circulate a response outside the meeting.

Resolved:

The board noted the report.

27/22 XPS - SURREY FIRE & RESCUE AUTHORITY PENSION BOARD REPORT [Item 7]

Witness:

Paul Mudd, XPS

Key points raised during the discussion:

1. The representative from XPS introduced the report and provided an overview of each section within the report which covered detail on an Overview, Member Self Service, Common Data, Membership, Completed Cases Overview, Completed Cases by Month and Complaints.
2. The Chairman highlighted the common data table on page 31 of the agenda which included data on the number of members with address issues.
3. The representative from XPS highlighted that the benefit statements would be produced the following month and that members could access them by going online to register. A schedule would also be available to provide information on when statements would be available. The Scheme Manager explained that a communications plan allowed pension items to be circulated internally through a newsletter as well potential circulation through the FBU. The Scheme Manager confirmed that she was happy for the detail on benefit statements to be added to the communication plan. The representative from XPS also confirmed that deferred members would receive a paper statement sent to their home address.
4. The representative from XPS explained that pensioners would receive a payslip if their net pay had changed by five pounds or more from one month to the next. The board also noted details of the process to confirm members addresses.
5. The board asked whether it was possible to contact all board members via email when required. XPS explained that an email could be used to establish communication with a member however personal information would not initially be used until their identity was verified. The board suggested that work be carried out to try to obtain email addresses for all members, allowing for information to be circulated when needed and potentially reducing the risk of losing contact when the member moved home address. The Scheme Manager agreed to consider and report back to the board.
6. The Chairman said that it was encouraging to see the completed cases higher in June than in previous months and thanked and congratulated the representative from XPS and his team for their work.
7. In regard to complaints, a member of the board said that a pension scheme member highlighted that they had received a letter labelled as Police Pension but was instead the Annual Benefit Statement for their Firefighters' Pension, The representative from XPS thanked the board member for highlighting the issue and explained that the majority of taxation correspondence was generated manually, rather than automatically, which could be the reason for the error. XPS explained that the Technical Manager would be made aware of the issue and that considerations would be made to prevent it happening going forward. Furthermore the Scheme Manager asked that pension scheme members make the Surrey pension team aware of any further issues.

Resolved:

The board noted the report.

28/22 FIRE BULLETINS [Item 8]

Witnesses:

Sally Wilson, Scheme Manager

Key points raised during the discussion:

1. The Chairman introduced the report.

Resolved:

The board noted the report.

29/22 RISK REGISTER [Item 9]

Witnesses:

Sally Wilson, Scheme Manager

Key points raised during the discussion:

1. The Chairman introduced the report.
2. The Scheme Manager proposed that risk F5 and F31 were closed which was agreed by the board.
3. The Scheme Manager highlighted a new risk, F39, which identified that there may be some incorrect salary information and noted that there could be more work to be done to resolve this. Actions would also be carried to understand the exact level of the risk to ensure an appropriate response. The risk register would be updated when appropriate.

Resolved:

The board noted the report.

30/22 DATE OF THE NEXT MEETING [Item 10]

The board noted the date of the next meeting as 10 November 2022.

Meeting ended at: 10.53 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) | Implement of modified pension scheme arrangements | Scheme Manager | <p>April 2022: Members who returned their Expression of Interest (Eoi) form by 31 December, were contacted in January 2022 to confirm their wishes had been noted and the Service is waiting for guidance from the government as to when the scheme will reopen. The second options exercise has not yet opened, and the Service were informed on 15 March that the regulations need to be drafted by the Home Office and consulted on before they become legislation. This process could take up to 18 months. Therefore, it is likely the options exercise will only open around October 2023. Communications were sent to members at the end of May 2022 with an update of the status of the project.</p> <p>November 2022: No further updates have been provided to FRA's with respect to the Matthews project. A short survey was completed in June 2022 and due to our position and the responses provided, GAD have selected the Service to provide further details on our affected members. This is due by 25 November 2022.</p> | Ongoing |

Item 5

| Date of meeting and reference | Item | Recommendations/ Actions | To | Response | Progress |
|--|---|--|-----------------------|--|----------------|
| | | | | <p>Additionally, whilst Eol forms were sent to affected members, the LGA have notified the Service that due to the changes in legislation, it is likely the new version of the Eol will need to be sent out to all members regardless of whether they have confirmed they would like to be considered as part of the Matthews project or not. The template will be provided in due course.</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>Legal advice has been sought on pensionable allowances and how the allowances should be treated both historically and going forward.</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> <p>April 2022: After the Priority Group 1 letters were sent, the Service was contacted by the FBU who confirmed they were seeking legal advice. The Pensions Project</p> | <p>Ongoing</p> |

| Date of meeting and reference | Item | Recommendations/ Actions | To | Response | Progress |
|---|---|---|---|---|----------------|
| | | | | <p>Team made the decision to pause communicating to other cohorts in case the FBU feedback required an alternative method or message to be adopted. A meeting with the FBU is planned to take place in April 2022.</p> <p>July 2022: A meeting has taken place with the FBU and a follow up email was received which contained their points to ensure the project benefitted those affected. Follow up advice from Weightmans is required to confirm how the Service will respond to the FBU.</p> <p>A communication was sent to all members to notify them of the current status of the project.</p> <p>November 2022: Extensive legal advice has been sought and the Service's stance has been communicated to the FBU. No feedback has been provided to the Service in response to our communication. Therefore, the project will recommence and Priority Group 1 members who have not responded will shortly be sent a communication and Priority Group 2 members will also be contacted.</p> | |
| <p>30 April 2020 A20/20 (Informal meeting)</p> | <p>Administration Update (1 January 2020 - 31 March 2020)</p> | <p>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.</p> | <p>Head of Data, Digital & Special Projects</p> | <p>No major changes. At this stage, Mercer are working through the GMP exercise and are 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.</p> <p>April 2021: Reports sent to Scheme Manager for review and decisions regarding tolerance setting levels.</p> | <p>Ongoing</p> |

| Date of meeting and reference | Item | Recommendations/ Actions | To | Response | Progress |
|-------------------------------|--|--|--|---|----------|
| due to Covid-19) | | | | <p>August 2021: Officers confirmed that a meeting on 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 for XPS to complete the GMP rectification project (XPS' quote far exceeded Mercer's quote which was politely declined).</p> <p>XPS have been working through the data needed required by Mercer to carry out the next step of the GMP exercise. Mercer provided a template to XPS which will assist with the rectification element of the project.</p> <p>November 2022: XPS were due to provide data extracts to the Service by the end of September 2022 which in turn would be provided to Mercer. XPS have not been able to finalise this piece of work and the Service are waiting for further information for an expected completion date.</p> | |
| 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: XPS confirmed that they were in the process of obtaining costs to undertake address tracing. | Ongoing |

| Date of meeting and reference | Item | Recommendations/ Actions | To | Response | Progress |
|-------------------------------|--|--|--|--|----------|
| | | | | <p>April 2022: XPS have provided the cost for this Service. This has been to the Scheme Manager to review and approve.</p> <p>July 2022: The cost to proceed with the exercise has been approved and a PO has been sent to XPS to commence with the task.</p> <p>November 2022: XPS have confirmed following discussions with their existing supplier, they will not be using a new supplier. XPS will be able to commence the mortality and address cleanse towards the end of October following the payroll cycle.</p> | |
| 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 | <p>January 2022: XPS stated that they were investigating systems that can provide a “live” view of calls waiting and available team members which should help reduce missed calls further. This development will be rolled out during 2022.</p> <p>April 2022: Monthly service meetings take place between XPS and SFRS to monitor the progress of tasks and provide areas of improvement where required.</p> <p>July 2022: An update was provided in June to confirm there are only 15 tasks outstanding of those which were sent to XPS. A tracker is in place for the tasks which are currently open. Confirmation is required as to how long the tasks have been open for.</p> | Ongoing |

| Date of meeting and reference | Item | Recommendations/ Actions | To | Response | Progress |
|-------------------------------|--|--|--|---|----------|
| | | | | November 2022: It has been confirmed that the inherited tasks have all been cleared. An updated in the report from XPS confirms the number of outstanding tasks XPS have for our members. Confirmation is required from XPS regarding the number of days the outstanding tasks are overdue by. | |
| 13 January 2022 A1/22 | Surrey Local Firefighters' Pension Board Actions and Recommendations Tracker | Regarding the 10% pensionable pay, the Scheme Manager agreed to circulate details on the communication timeline for each priority group to members of the Board. | Head of Data, Digital & Special Projects | <p>April 2022: A timeline of when members are due to be contacted was sent to the Fire Officer Association (FOA) employee representative on 21 January 2022. After this date the Service heard from the FBU and the communications to members was placed on hold (FOA were informed).</p> <p>July 2022: The communications with the FBU are still underway. Therefore, the timeline has not been updated since January 2022.</p> <p>November 2022: Legal advice has been sought and the Pension Project Team will recommence with contacting members. The project timeline will be updated and circulated to the Board shortly.</p> | Ongoing |
| 28 July 2022 A4/22 | Scheme Management Update Report | That the Board be provided with an annual update on work related to the Pension Regulator – “six processes” factsheet. | Head of Data, Digital & Special Projects | November 2022: The Pensions Project Team has noted this request and will send an update by the end of January 2023 as this will be one year since the first version of the six processes was analysed and provided to the Board. | Ongoing |

| Date of meeting and reference | Item | Recommendations/ Actions | To | Response | Progress |
|-------------------------------|---|--|--|--|-----------|
| 28 July 2022 A7/22 | XPS – Surrey Fire & Rescue Pension Board Report | The Board suggested for work to be carried out to try and obtain email addresses for all members, allowing for information to be circulated when needed and potentially reducing the risk of losing contact when members move to a different address. The Scheme Manager agreed to consider this and report back to the Board. | Head of Data, Digital & Special Projects | November 2022: The Pensions Project Team will shortly be assessing the feasibility of this. The Board is asked to note this will be an extensive task as the current database systems within the Service do not necessarily contain personal email addresses. | Ongoing |
| 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> <p>April 2022: Training took place with the LGA which took on 29 March 2022. The Pensions Team, Scheme Manager and Local Pension Board members all attended.</p> | Completed |

| Date of meeting and reference | Item | Recommendations/ Actions | To | Response | Progress |
|-------------------------------|--|--|--|---|------------------|
| | | | | November 2022: The LGA will be contacted again in early 2023 to arrange another training session for the Local Pension Board members. | |
| 28 April 2022 A3/22 | XPS Administration - Surrey Fire and Rescue Service Pension Board Report | The representative from XPS agreed to circulate the correct data on 'membership movements within the schemes' to the Board. | Head of Data, Digital & Special Projects | <p>July 2022: XPS provided the Pension Board Report on 30 June 2022 and section 4 contained up-to-date membership information which illustrates the movements of members in the three pension schemes. Further investigation is required in this area as there are still outstanding queries on the figures provided.</p> <p>November 2022: An update was provided by XPS in their report for the Local Pension Board in July 2022. There was an error with the reporting which caused the initial concern with the membership data. The figures have been updated accordingly.</p> | Completed |
| 28 July 2022 A5/22 | Scheme Management Update Report | The Board requested for a list be circulated of the fire services continuing to apply immediate detriment, and of those that were not, be circulated to the Board members outside of the meeting. | Head of Data, Digital & Special Projects | November 2022: This has now been circulated to the Board. Feedback is required from the Board as to whether further actions are required. | Completed |
| 28 July 2022 A6/22 | Scheme Management Update Report | Regarding the 10% Pensionable Allowances, the Chairman asked for confirmation on the number of priority groups and members within each group. The Scheme Manager agreed to circulate a response outside the meeting. | Head of Data, Digital & Special Projects | November 2022: This has now been circulated to the Board. Feedback is required from the Board as to whether further actions are required. | Completed |



Surrey Local Firefighters' Pension Board 10 November 2022

Scheme Management Update Report

Recommendations:

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

1.0 Introduction:

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

2.0 Scheme Management Activities

McCloud - Age Discrimination – Immediate Detriment Remedy

2.1 The Bank Staff within the Pension Project Team have commenced with the data collection exercise. Whilst good progress has been made, the templates are extensive and time consuming as it requires accessing each individual member's payroll record. The Pension Project Team are waiting for a report from the payroll department to assist with the data collection exercise. This is expected at the end of October 2022.

2.2 Communications have been maintained with XPS regarding the progress of the data collection exercise. The completed data sheets are to be submitted to XPS by 31 December 2022 yet there does appear to be some flexibility with the deadline. The wider Pensions Project Team now have access to the payroll system so are able to assist with this exercise once training from the Bank Staff has taken place.

2.3 The Scheme Manager reported at the July Local Pension Board that the Service had been sent a notice of action by the Fire Brigade Union (FBU) in June 2022 regarding the Service's stance on adopting the Immediate Detriment Framework (IDF) – i.e. not implementing IDF due to the retraction of the MoU from the Home Office. The Service sought legal advice and responded to the notice no reply has been received.

2.4 The Service was notified at the end of October 2022 and via the FBU website, of compensation some of the Service's members are set to receive following their complaints which were logged regarding the closure of the 1992 and 2006 pensions schemes. It is important to note, that not all members will receive the compensation. It will only apply to

those who logged a complaint with the FBU. The Service is awaiting further information as to how the compensation will be paid and who will benefitting from this.

10% Pensionable Allowance

2.5 After the meeting with the FBU in May 2022, the Service has not received any further feedback or details of the legal advice the FBU had gained. The Pensions Team have however, obtained further legal advice from Weightmans's and are now clear on their position.

2.6 A communication was sent to the FBU in September to confirm the Service's position with a deadline of 3 October 2022 provided for feedback to be submitted. No further comments have been received. The Pensions Team will recommence with the project and they will be contacting members of Priority Group One who did not respond and Priority Group Two.

2.7 Calculations have been finalised for all Priority Groups apart from Priory Group Seven. The calculations for this cohort are in progress.

Matthews - Modified Scheme – On-Call Access

2.8 Following on from the responses the Pensions Team provided to the LGA's short survey on 14 June 2022, the Service has been selected by Government Actuary Department (GAD) to provide further information. The LGA has informed the Service that the additional information will be used to: *"estimate the possible impact on scheme liabilities; project scheme cashflows in future years; and develop a calculator for FRAs and administrators to use to process cases during the second options exercise. Additionally, it will help the Home Office in their work to introduce the Matthews remedy including its public sector equality duty, as well as helping us in our work to support the implementation of the second options exercise."*

2.9 The Pensions Team have been provided with a template to provide the information required and progress is already being made. The information needs to be provided to the LGA by 25 November 2022 which is a short timescale for the amount of work that is required. However, the Service expect to be able to complete the exercise within the designated timescales.

Pension Policy

2.10 The Pension Project Team have created an overarching policy for the Service's pensions. Amendments have been made to the policy which is at the final stage of approval before it is placed onto SharePoint for the members of the Service to access.

Audit

2.11 The internal Audit Team at Surrey County Council have completed their audit on the contract between XPS Administration and Surrey Fire and Rescue Service. The overall assurance rating was deemed as 'reasonable' with five medium rated findings.

2.12 Actions have been set for the Pensions Team to achieve, which are due for completion by 28 February 2023.

Pension Team Resourcing

2.13 The business case has been approved for a Pensions Support Assistant to join the team. The advert for this role is now live with the closing date of 28 October 2022. Interviews are due to take place over the week commencing 31 October and 7 November 2022. The role is an 18 month fixed term contract, and will support the Pensions Team over a number of different tasks across all projects.

Ill Health Retirement

2.14 The creation of an ill health retirement policy is underway along with a suite of supporting files for managers and inhouse teams to reference. The ill health retirement flow chart has been updated for current use in addition to the forms to be completed by the member and manager.

2.15 It is hoped the ill health retirement policy will be available for review early in 2023. In the interim quarterly meetings continue to take place with the Employee Relations Partner, Senior Pensions Advisor, Scheme Manager and an external Operational Health colleague.

Incorrect pensionable pay and salary details submitted to XPS

2.16 An extensive review regarding the reasons for the incorrect pensionable pay and salary information passed to XPS from the Service has now been completed. It appears there were no errors with the pensionable pay data for members contributing to the FPS 2015 scheme. However the salary information was inconsistent for members who had contributed to the FPS 1992 scheme before it's tapered closure in April 2022. In some instances, the pay data sent to XPS included Continuing Personal Development (CPD) payments and in other instances it did not. A detailed spreadsheet was submitted by the Senior Business Finance Partner at Surrey County Council to XPS so it could be understood where CPD payments were or were not included in pensionable pay.

2.17 As a result the risk for this item (F37) has been significantly reduced and the Board is asked to remove this from the register.

Industrial Action

2.18 Communications have been sent out to members to update them on the impacts of industrial action and to provide key information as to what this means with respect to their pension and contributions.

2.19 The Pensions Project Team have also been in contact with XPS to ensure that should industrial action take place, all member data is recorded in a manner which can be easily transferred to XPS for updates to the system to be implemented.

Pensions Dashboard

2.20 The Scheme Advisory Board (SAB) sent a communication to remind the Service of the tasks that that need to be completed ahead of the staging date for the Pensions Dashboard – 30 September 2024.

2.21 The tasks to be worked through are:

- Confirming with our staging provider (XPS Administration) how requests will be matched and the means the information will be sent to the dashboard
- Ensuring the infrastructure is in progress to hold and share the information with the dashboard
- Reviewing scheme data to ensure it is up to date

2.22 The Service has received confirmation with XPS Administration that the building of staging software is underway which will meet the requirements of the dashboard. Additionally as part of the McCloud project, member data is being reviewed and updated so it will be accurate by the staging date. Further discussions will take place with XPS in Q1 of 2023 for the next steps the Service needs to adopt.

Training

2.23 From the training which took place in March 2022 for all Local Pension Board members, a number of actions were highlighted. An update on the progress of these actions has been provided:

| Topic | Tasks | Status |
|------------------------------|--|--|
| McCloud / Age discrimination | <ol style="list-style-type: none"> 1. Ensure all remaining members are transferred into FPS 2015 from 1 April 2022 on payroll 2. Send cohort-specific 1 April 2022 letter to all members* 3. Distribute 'Your questions answered' factsheet 4. Monitor optant outs 5. Communicate opt in message. 6. Update websites and other resources 7. Consider possible upcoming IQMP referrals 8. Send follow up letter to former protected members 9. Collection and cleansing of remedy data | <ol style="list-style-type: none"> 1. Completed 2. Completed 3. Completed 4. Ongoing 5. Completed 6. To action 7. Underway 8. Completed 9. Underway |
| Immediate detriment | <ol style="list-style-type: none"> 1. Continue to consider adoption of the framework 2. Maintain communication with members and local rep bodies 3. Continue data collection work for cases 4. Calculate potential liabilities to assess financial risk 5. Consider alternative to not adopting Framework | <ol style="list-style-type: none"> 1. Underway 2. Underway 3. Underway 4. Completed 5. Completed |
| Matthews / modified | <ol style="list-style-type: none"> 1. Identify those in scope 2. Find out what steps were taken for 2014 exercise 3. Provide aggregation numbers to LGA by 31 May 2022 4. Respond to consultation (in due course) | <ol style="list-style-type: none"> 1. Completed 2. Completed 3. Completed 4. To action |
| Pensions dashboard | <ol style="list-style-type: none"> 1. Consider how to connect 2. Consider what resources will be needed 3. Begin / continue to cleanse data | <ol style="list-style-type: none"> 1. To action 2. To action 3. Underway |
| Abatement | <ol style="list-style-type: none"> 1. Review existing policies 2. Revisit previous cases if required 3. Monitor cases for consistency in decision making and process followed | <ol style="list-style-type: none"> 1. Underway 2. To action 3. Underway |

Risk Management

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

3.0 Summary

3.1 The Board is asked to note the update provided.

Report contacts: 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: Scheme Advisory Board letter on Pension Dashboards

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Sent by email to: Scheme managers, Local Pension Board chairs

Cc: Local Pension Board lead contacts, Chief Fire Officers

Published on www.fpsboard.org

27 October 2022

Dear FPS scheme manager/ Local Pension Board chair

Message from the Firefighters' Pensions (England) Scheme Advisory Board (SAB) regarding pension dashboards

I am writing to you as we have you recorded as the Scheme Manager/ Local Pension Board chair for your local Fire Pension Scheme. If this is the case, can I thank you very much for your service and, if this is not the case, please can you advise the LGA who the Scheme Manager should be.

It is part of the SAB's role to provide advice to scheme managers and Local Pension Boards in relation to the effective and efficient administration and management of the Firefighters' Pension Scheme 2015 and any connected scheme. The SAB therefore agreed to issue a reminder to scheme managers of their duties with respect to the new [Pensions Dashboards](#). Pensions Dashboards are a government initiative to allow pension scheme members in Great Britain to view all of their pension entitlements online in one place. There is a legislative requirement for fire schemes (along with all other public sector schemes) to connect to the dashboard by 30 September 2024, with a further requirement to be able to provide information about benefits (value data) by 1 April 2025 at the latest.

While we expect scheme managers to be able to delegate many of the actions required to set their Scheme up on the dashboard to their administration provider, it is our understanding that scheme managers are ultimately responsible in law for ensuring that dashboard duties are met. These include:

- Working towards your staging date. The Pensions Regulator (TPR) is keen that schemes start planning now to be able to match dashboard requests to scheme records and return the required information to the dashboard. You will need to understand how your provider will be able to pick out those requests which correspond to your members and ensure that they are providing information to the right individuals.

- Ensuring the infrastructure is in place to hold and share data with the dashboard: Your administrator should be able to tell you how they are planning to connect whether through the existing software providers or through some other route.
- Reviewing scheme data: We understand that the data which is used for the dashboard is likely to be based on information currently being provided as part of Annual Benefit Statements (ABSs). The SAB is keen to encourage the parties to agree consistent information for those documents, particularly given the challenges arising from the Sargeant remedy and second special members options exercise (Matthews). We understand that forums are being provided to discuss such matters and that the LGA will ensure that further information is available in due course.
- Co-operation with the Money and Pensions Service (MaPS). You can get more information on this from [Pensions dashboards: initial guidance | The Pensions Regulator](#)

If you have not already, please get in touch with your administrator to discuss their plans for connecting to the dashboard. You may also want to start thinking about whether you will need to allocate additional resources to make sure your data is fit for purpose.

Please contact the SAB secretariat at bluelight.pensions@local.gov.uk if you have any questions on this or would like to feed back any comments to the SAB.



Joanne Livingstone
Chair of the Firefighters' Pensions (England) Scheme Advisory Board



Surrey Fire & Rescue Authority

Pension Board Report

2022/2023 – Q2

Contents

01 Overview

02 Member Self Service

03 Common Data

04 Membership

05 Completed Cases Overview

06 Completed Cases by Month

07 Complaints

01 Overview

Regulations and Guidance

July 2022

XPS attended the Fire Technical Working Group – Monday 25th July 2022.

LGA issued bulletin 59

Key points:-

Administrator self-assessment results

LGA shared the results of the survey undertaken by the scheme advisory board providing an insight into the current administrator arrangements and challenges faced by administrators in business as usual and remedy.

FPS2006 special members – Corrective action

The issue relates to members who have elected for special membership under the first option exercise and to repay their contributions by way of periodical payments who have left part way through their contract and therefore have a number of instalments still outstanding.

Actions required: -

Administrators to consider the recommendations set out in section 5 of the administrator survey results report.

FRA's to revisit all special members leavers and opt outs to ensure that correct options have been given at deferment.

FRA's to have a process in place to ensure that their administrator is informed of any unpaid breaks in service for transitional FPS 2015 members.

Pensionable data to be shared for members who are subject to age discrimination remedy and have had an inter-brigade transfer during the remedy period with the current FRA's administrator.

McCloud factsheet published by TPO to be reviewed by FRA's.

August 2022

LGA issued bulletin 60

Key points:-

Age discrimination eligibility – factsheet

To help administrators and FRA's determine which individuals are in scope for remedy.

Abatement Guidance – Updated

Cumbria FRS has given permission for their retirement, re-engagement and abatement policy to be shared with the sector as an example of best practise.

Electric vehicle salary sacrifice

The bulletin advises that there is a provision within FPS2015 for salary sacrifice however, it is up to each individual FRA to determine whether EV's meet the requirements. Links are also provided to detailed government guidance.

Actions required: -

FRA's to review the eligibly factsheet and ensure appropriate action is taken where necessary.

September 2022

LGA issued bulletin 61

Key points:-

Immediate detriment Framework guidance updated

When amendment to the framework are agreed the guidance will be updated to reflect those changes.

Potential Industrial Action

LGA have set out the effect of taking strike action will have on an individual's pension rights.

Actions required: -

FRA's to send appropriate follow up communication to all originally out of scope individuals.

Additional Work / Previous Minutes

Use of tracing service to confirm addresses for those members approaching, or beyond, Normal Retirement Age

In previous reports we have discussed using a new supplier for the purposes of mortality checks and member address cleansing.

Following discussions with our existing supplier, we have decided to retain their enhanced services and will be able to commence the mortality and address cleanse towards the end of October following the payroll cycle.

This organisation is already vetted by the XPS Risk and Compliance team and therefore we will not need the enhanced 3rd party supplier checks completing on the new organisation.

The process will be exactly the same as we outlined in the previous report.

Conditional Data Testing

Work has commenced to map the entire Fire Schemes database to a Conditional Data testing facility within XPS which will give a conditional data score. This is a prerequisite to being able to prove that we are 'Dashboard Ready' in advance of connecting to MAPS Dashboard service in late 2024.

Scheme Returns

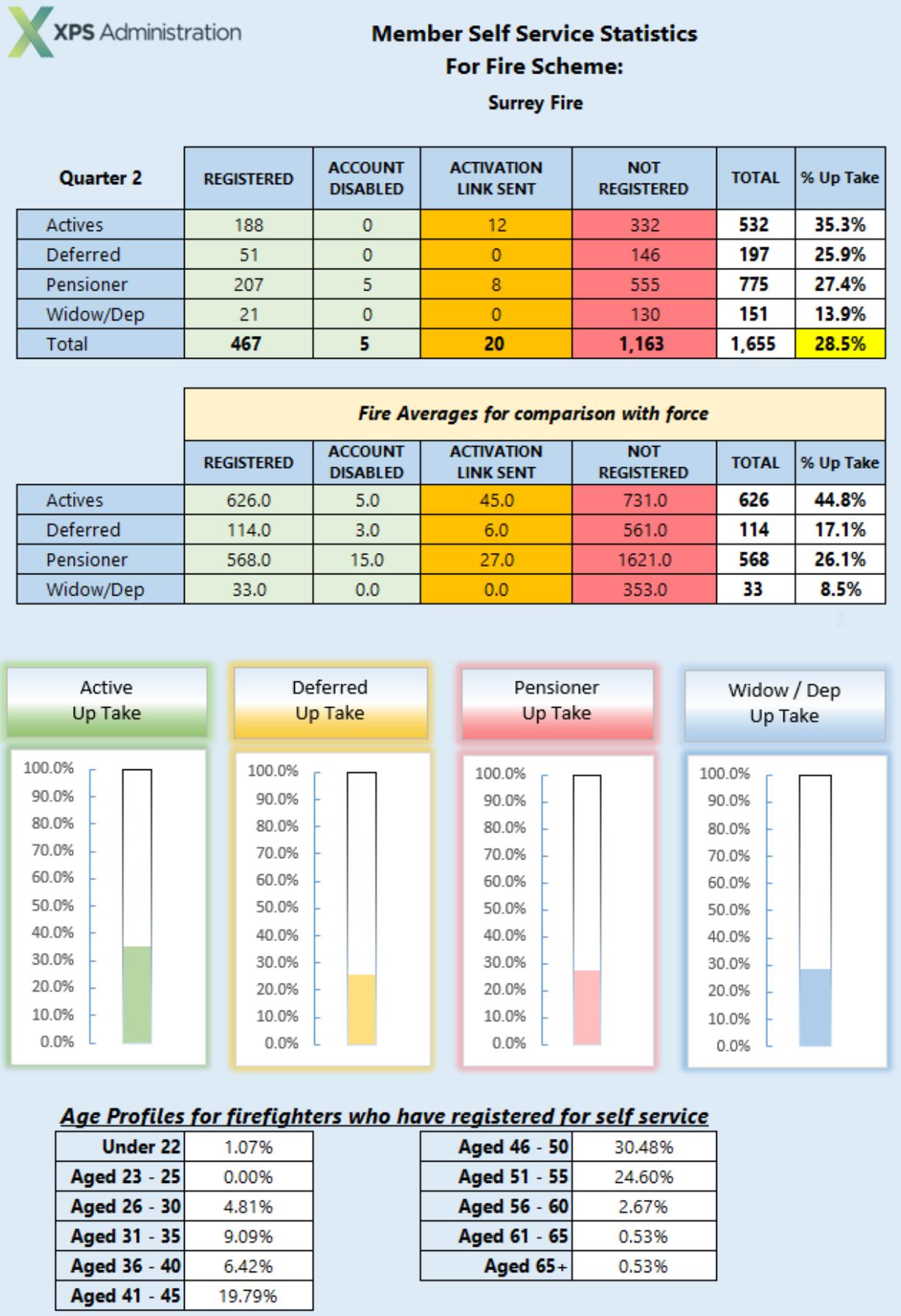
XPS have prepared a draft Scheme Return which will be submitted to the Pensions Regulator. The submission must be made in advance of the 18th November 2022.

Annual Benefit Statements & Pensions Savings Statements

XPS have produced statutory documentation for the above in accordance with the standard deadlines (31 August and 6th October respectively).

02 Member Self Service

Analysis for member self service when compared to the previous quarter shows an increase across all membership cohorts.



03 Common Data

| Surrey Fire | | | |
|------------------------------------|--------------------------|--------------------|-------------|
| Data Test | Common data score | | |
| | Max Population | Total Fails | % OK |
| NINO | 2308 | 2 | 99.91% |
| Surname | 2308 | 0 | 100.00% |
| Forename / Inits | 2308 | 0 | 100.00% |
| Sex | 2308 | 0 | 100.00% |
| Title | 2308 | 0 | 100.00% |
| DoB Present | 2308 | 0 | 100.00% |
| Dob Consistent | 2308 | 0 | 100.00% |
| DJS | 2308 | 0 | 100.00% |
| Status | 2308 | 0 | 100.00% |
| Last Status Event | 2308 | 1 | 99.96% |
| Status Date | 2308 | 21 | 99.09% |
| No Address | 2308 | 13 | 99.44% |
| No Postcode | 2308 | 19 | 99.18% |
| Address (All) | 2308 | 54 | 97.66% |
| Postcode (All) | 2308 | 60 | 97.40% |
| Members with a Fail | 2308 | 28 | 98.79% |
| Members with Multiple Fails | 2308 | 55 | 97.62% |
| Total Fails | 2308 | 83 | 96.40% |

The Common Data reports are run on a quarterly basis, just after the quarter end.

Data quality is good and where we have failures here, it is likely that at least for some of them, they cannot be rectified.

An example of this is the NI Number – we currently pay pensions to people of all ages. For Surrey Fire and Rescue, your oldest dependent is 101 and the youngest 9.

For children in receipt of a dependents pension, they will not receive a NI Number of their own until they reach age 16. We therefore have to create a temporary NI Number which carries a prefix of TN, this is not a recognised NI Number, and will therefore fail the NI Number quality test. These will naturally be resolved in the passing of time.

The tests for Title are quite specific. Missing titles will fail, as will some of the lesser-known titles. Occasionally, if a member set has been imported and there are additional spaces within the Title field, these can also cause fails.

Address / Post Code Fails can occur either where the data is missing, or, where the address does not meet the standards as dictated by the UK postal service. Typically, we see that the deferred cohort are those with the most missing fails and overseas address can fail as they do not meet UK standards for format / layout.

04 Membership

Quarter 2 2022 - 2023

| Scheme | Actives | Deferred | Pensioner | Widow | Dependant |
|--------------|--------------|--------------|--------------|--------------|------------|
| Old - PPS | 0 - | 75 ▼ | 787 ▲ | 140 ▼ | 8 - |
| New - NPPS | 2 ▲ | 93 ▼ | 20 ▲ | 0 - | 0 - |
| CARE - 2015 | 599 ▲ | 87 ▲ | 12 ▲ | 2 - | 1 - |
| Total | 601 ▲ | 255 ▲ | 819 ▲ | 142 ▼ | 9 - |

Quarter 1 2022 - 2023

| Scheme | Actives | Deferred | Pensioner | Widow | Dependant |
|--------------|--------------|--------------|--------------|--------------|------------|
| Old - PPS | 0 ▼ | 76 ▲ | 782 ▲ | 141 ▼ | 8 - |
| New - NPPS | 0 ▼ | 94 ▲ | 19 ▲ | 0 - | 0 - |
| CARE - 2015 | 521 ▼ | 83 ▲ | 7 ▲ | 2 ▼ | 1 - |
| Total | 521 ▼ | 253 ▲ | 808 ▲ | 143 ▼ | 9 - |

Previous Quarter 4

| Scheme | Actives | Deferred | Pensioner | Widow | Dependant |
|--------------|--------------|--------------|--------------|--------------|------------|
| Old - PPS | 19 ▼ | 72 - | 770 ▲ | 144 ▲ | 8 ▼ |
| New - NPPS | 8 ▼ | 93 ▲ | 18 ▲ | 0 - | 0 - |
| CARE - 2015 | 540 ▼ | 60 ▲ | 4 - | 3 - | 1 - |
| Total | 567 - | 225 - | 792 - | 147 - | 9 - |

This table is designed to be a very quick, at a glance, display of the membership movements within the schemes. This will be provided on a quarterly basis at each meeting on a rolling year basis.

05 Completed Cases Overview

| Surrey Fire | Cases completed | Cases completed within target | Cases completed outside target | Cases: % within target |
|---------------------|-----------------|-------------------------------|--------------------------------|------------------------|
| April | 58 | 43 | 15 | 74% |
| May | 64 | 44 | 20 | 69% |
| June | 65 | 61 | 4 | 94% |
| Quarter 1 | 187 | 148 | 39 | 79% |
| July | 49 | 35 | 14 | 71% |
| August | 41 | 37 | 4 | 90% |
| September | 42 | 37 | 5 | 88% |
| Quarter 2 | 132 | 109 | 23 | 83% |
| October | | | | |
| November | | | | |
| December | | | | |
| Quarter 3 | | | | |
| January | | | | |
| February | | | | |
| March | | | | |
| Quarter 4 | | | | |
| Year - Total | 319 | 257 | 62 | 81% |

This table is designed to be a very quick, at a glance, display of the total cases completed within the year.

Further details on specific workflows are shown below.

KPI performance was at 71.4% for the month of July, with 35 cases out of 49 being completed in time. This does show a fall from the month of June but there are reasons within the task detail as shown below:

- Two deferred cases. One related to the small CARE pension accrued from 1.4.22, and one a standalone deferred membership.
- Four estimate cases. These related to two members, with one member requiring three different dates so these do appear as three separate cases.
- Eight general cases. These were made up of two requests for potential widows pensions, and six other queries about member records. Two of these were ongoing tasks from the inherited work where we need to clarify and update member records based on incorrectly held information.

Performance for August was 90%, with 37 out of 41 cases being looked at within the normal timeframes. This represents an improvement on the previous month. Cases that were completed outside of the SLA were:

- Deferred. Delay in deferment of record for a member who has now re-joined Surrey FRA. Task related to deferring period 2015 to 2020 before we took over administration and resolving this before we could update current status.
- Estimate. Delay in providing figures to member unfortunately but no impact on payment.
- Two General cases. One was an ongoing query relating to modified retained membership with another FRA that was ongoing from before we took over. Now resolved. One case where the member asked about returning to employment after retirement and there was a delay in sending the response to them.

September stats were 88%, or 37 cases out of 42. Cases completed outside of target were:

- 1 deferred case. This related to the 2015 portion of a retired member and details were sent out outside of the normal KPI.
- 2 estimates. One was for a member who had both WT and retained memberships and required manual adjustments, and one was a wholetime member with additional questions.
- 1 General. This related to a deceased member and was the next of kin informing us there would be a delay in the repayment of the outstanding pension. This should have been noted on a different workflow but was set up in error.
- 1 deferred options. Member was due into payment from 18th September, and options were issued on 3rd September. Ideally we like to send these four weeks before payment and there was a delay in issuing these, however still within time for payment to be made.

The KPI statistics are very similar for the last two months of the quarter but do represent an improvement on the July figures. We are continuing to focus on training and are hopeful of improved results in future quarters, but continue to monitor our performance very closely and do have monthly meetings with Surrey to discuss.

06 Completed Cases by Month

Here we break down the performance of XPS month by month. Each month is split out into its own table with the fifteen main KPI's listed with performance set out against each of them.

July 2022

| July 2022 | | | | | |
|-----------------------------------|------|----------------|-------|---------------|--------------------|
| Service | Days | Minimum Target | Cases | Within Target | Actual Performance |
| Death in Service | 5 | 100 | 0 | 0 | 0 |
| Death of a pensioner | 5 | 100 | 2 | 2 | 100 |
| Deferred Benefits | 10 | 90 | 3 | 1 | 33 |
| Divorce Cases | 30 | 100 | 0 | 0 | 0 |
| Estimates | 10 | 100 | 7 | 3 | 43 |
| General | 10 | 100 | 27 | 19 | 70 |
| Processing new entrants | 10 | 90 | 0 | 0 | 0 |
| Refunds | 10 | 100 | 0 | 0 | 0 |
| Retirement Actual | 10 | 100 | 3 | 3 | 100 |
| Retirement Options | 10 | 100 | 2 | 2 | 100 |
| Transfers – in (Calculation) | 10 | 90 | 0 | 0 | 0 |
| Transfers – in (Payment received) | 10 | 90 | 0 | 0 | 0 |
| Transfers – Out (Calculation) | 10 | 100 | 0 | 0 | 0 |
| Transfers – Out (Payment) | 10 | 100 | 0 | 0 | 0 |
| Variations | 10 | 90 | 5 | 5 | 100 |

August 2022

| August 2022 | | | | | |
|-----------------------------------|------|----------------|-------|---------------|--------------------|
| Service | Days | Minimum Target | Cases | Within Target | Actual Performance |
| Death in Service | 5 | 100 | 0 | 0 | 0 |
| Death of a pensioner | 5 | 100 | 1 | 1 | 100 |
| Deferred Benefits | 10 | 90 | 1 | 0 | 0 |
| Divorce Cases | 30 | 100 | 2 | 2 | 100 |
| Estimates | 10 | 100 | 1 | 0 | 0 |
| General | 10 | 100 | 12 | 10 | 83 |
| Processing new entrants | 10 | 90 | 18 | 18 | 100 |
| Refunds | 10 | 100 | 0 | 0 | 0 |
| Retirement Actual | 10 | 100 | 1 | 1 | 100 |
| Retirement Options | 10 | 100 | 1 | 1 | 100 |
| Transfers – in (Calculation) | 10 | 90 | 1 | 1 | 100 |
| Transfers – in (Payment received) | 10 | 90 | 0 | 0 | 0 |
| Transfers – Out (Calculation) | 10 | 100 | 0 | 0 | 0 |
| Transfers – Out (Payment) | 10 | 100 | 0 | 0 | 0 |
| Variations | 10 | 90 | 3 | 3 | 100 |

September 2022

| September 2022 | | | | | |
|-----------------------------------|------|----------------|-------|---------------|--------------------|
| Service | Days | Minimum Target | Cases | Within Target | Actual Performance |
| Death in Service | 5 | 100 | 1 | 1 | 100 |
| Death of a pensioner | 5 | 100 | 2 | 2 | 100 |
| Deferred Benefits | 10 | 90 | 2 | 1 | 50 |
| Divorce Cases | 30 | 100 | 0 | 0 | 0 |
| Estimates | 10 | 100 | 5 | 3 | 60 |
| General | 10 | 100 | 16 | 15 | 94 |
| Processing new entrants | 10 | 90 | 2 | 2 | 100 |
| Refunds | 10 | 100 | 0 | 0 | 0 |
| Retirement Actual | 10 | 100 | 3 | 3 | 100 |
| Retirement Options | 10 | 100 | 4 | 3 | 75 |
| Transfers – in (Calculation) | 10 | 90 | 0 | 0 | 0 |
| Transfers – in (Payment received) | 10 | 90 | 0 | 0 | 0 |
| Transfers – Out (Calculation) | 10 | 100 | 0 | 0 | 0 |
| Transfers – Out (Payment) | 10 | 100 | 0 | 0 | 0 |
| Variations | 10 | 90 | 7 | 7 | 100 |

Task analysis

There are 97 tasks within our workflow for your scheme members, made up of the following:

Tasks with a future date for completion = 39

This is a total mixture of business as usual work and we will of course try and complete this within the permitted timescales.

Tasks where we are awaiting a response = 41

These are collection tasks and are required where we are awaiting information from scheme members, transfers in and from Surrey FRA.

Annual Allowance Cases = 11

Tasks associated with the collection of information or the calculations in respect of pensions taxation and the recent PSS exercise

Items Overdue = 6

These case cover inter-brigade transfers and general cases.

Inherited Backlog

Of the 165 tasks inherited in September 2021, we can confirm that these have all been cleared.

07 Complaints

| Full Name | Description | Date received | Date completed | Comment |
|-----------|------------------|---------------|----------------|---------|
| | None this period | | | |



Paul Mudd
Governance Manager
01642 030682

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Surrey Local Firefighters' Pension Board 10 November 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 59, 60 and 61 (Annex 2) have been published since the last Board meeting.

- Bulletin 59 informed the reader that the Administrator self-assessment survey results had been published. Whilst we have not been able to review the exact responses provided by our administrator, from the information provided the Service believes XPS has responded to us in the right means on the Sargeant and McCloud projects.
- The Bulletin highlighted that as qualifying service in the FPS 1992 is added to the FPS 2015 pension scheme, any periods of leave will affect a member's pensionable service and ultimately their retirement age. Therefore FRA's need to have a process in place to ensure if a member has any breaks in service, this is reported to the pension administrators at the earliest opportunity. The Pensions Team are working with internal teams to align this transfer of information to XPS.
- In relation to the Sargeant case, Bulletin 59 informed FRA's that should a member who is affected by the age-discrimination remedy, have an inter-brigade transfer, then they are to share any information on the member with the current FRA administrator. Whilst this has been noted to potentially cause a GDPR breach, it was confirmed at the Fire Technical Working Group on 25 July 2022 that pension administrators have a legitimate reason for requiring the information so a breach would not be caused.
- Bulletin 59 confirmed representatives from Heywood Pension Technologies attended the Scheme Advisory Board (SAB) meeting on 23 June 2022 and provided an update on the progress of the software required for remedy. Heywood Pension Technologies (along with other software developers) also provided an update on the phases of development going forward which the SAB felt were useful.
- Information was provided on The [Pension Ombudsman \(TPO\) factsheet in relation to McCloud](#) and it's view on how FRA's should be responding to remedy. The Pensions Project Team have read through this factsheet and do not feel we have fallen short of TPO's expectations. Further legal advice will be obtained as and when it is deemed necessary.

- Bulletin 59 confirmed that due to the LGA's response to the Department for Work and Pensions consultation on the pension dashboard, the staging date for FRA's has been extended from 30 April 2024 to 30 September 2024. This now provides FRA's with a little extra time to ensure any members who are affected by McCloud, have the latest and most up to date information on the pension dashboard when it goes live for public service schemes.
- It was highlighted in the Bulletin that the LGA had received clarification from HMRC on the changes to annual allowance rules. Due to the change in rules, administrators will have to recalculate annual allowance amounts for previous years in certain situations. However it was unclear as to when any changes in Annual Allowances (AA) charges had to be reported by. Detailed information on the situations AA need to be reported along with the deadline administrators need to work to, can be found in the amended regulations and explanations in the [pension schemes newsletter 140](#).
- Bulletin 59 informed readers of the change to the Employer Cost Cap and Specified Restricted Scheme Regulations 2022 which came into force on 3 August 2022. The amended regulations set out the specified margins for the cost cap introduced by the Public Service Pensions Act 2013. The margins are the parameters which the scheme costs must remain within before corrective action is taken. The new regulations are now set to three percentage points above and below the employer cost cap rate.
- The Bulletin also highlighted the agenda for the Fire Pension Scheme Conference. The conference is due to take place on 25 and 26 October and both the Chair of the Board and a member of the Pensions Project Team are due to attend.
- Bulletin 60 commenced by informing FRA's of an [Age Discrimination Eligibility Factsheet](#) developed by the LGA. The factsheet confirms the four conditions which must all be met for remedial service and encourages scheme managers to review those who have been deemed to be in scope. The factsheet has been reviewed by the Project Team and yet no members who fall out of scope have been identified.
- The Bulletin informed FRA's that Cumbria Fire and Rescue Service has shared their *Retirement Re-Engagement And Abatement policy*. This policy can be adopted by other FRA's. The information in this policy has been included within the abatement policy currently in the process of being written by the Pensions Project Team. [The LGA's informal guidance on abatement](#) has also been updated as a further reference point for FRA's which the Pension Project Team has referred to extensively.
- Bulletin 60 [highlighted The Pensions Regulator \(TPR\) has published a new strategy to combat pension scams](#). The strategy hopes to:
 - educate savers about the threat that scams present
 - encourage higher standards and preventing practices that lead to saver harm
 - fighting fraud through the prevention, disruption and punishment of criminality.
- Bulletin 61 commenced with notifying readers of a template which the LGA has created for FRA's to send to members originally deemed as out of scope for the McCloud remedy project, yet following on from reading the eligibility factsheet are now eligible for consideration. The Pensions Project Team have liaised with XPS Administration and no further members are in scope.

- As part of the Firefighters' Pension Scheme 2014 regulations 4H(1), the Scheme Advisory Board (SAB) is required to set an annual budget for approval by the Secretary of State. The 2022-23 budget was submitted to the minister at the start of October and it is expected the collection for the SAB Levy will start in November/ December 2022. A letter will be sent to Chief Fire Officers to request a purchase order number. The levy includes the employers' voluntary subscription to fund support with FRAs understanding and management of the FPS.
- Bulletin 61 confirmed SAB, the LGA and the Home Office are working together on collaboration sessions on the Matthews (Modified) case. The sessions work through the Matthew's legislation and policy, and the proposed timeline particularly with how this is affected by McCloud. The LGA has published a [Matthews Project Implementation Document \(PID\)](#) which sets out the scope, deliverables, and high-level timeline for the project. The PID also includes a communications plan.
- The Bulletin notified FRA's of The Pensions Regulator scheme return notices which were issued in October. Scheme managers are reminded to double check their details in Exchange are correct and that the FRA could be fined if the return is not completed on time. XPS have confirmed they will be sending the draft scheme returns to the Service for our consideration before they are submitted on our behalf.
- Bulletin 61 confirmed the LGA had provided a response to the Pensions Dashboards Programme consultations. This was in respect to the consultation on *Dashboard Standards And Guidance* and *The Call For Input On Design Standards*. Bulletin 61 highlighted a number of responses the LGA provided in addition to a recommendation for FRAs':

In relation to the code of connection and connection guidance "...we (LGA) stated that we understand that pension providers have a responsibility to assure themselves that a third-party provider has met all required standards. We will recommend that FRAs' Local Pension Boards play a key role in applying an appropriate level of scrutiny."

The Pensions Project Team asks the Surrey Local Firefighter Pension Board to note this recommendation. The LGA provided a [full response to the consultations](#) on behalf of the Fire Pension Scheme.

- The Bulletin provided an overview of the content of the HMRC Pension Scheme Newsletter 142. Topics within this newsletter included:
 - Normal minimum pension age – updates to the Pensions Tax Manual
 - Migrating your pension schemes – take action now
 - Accounting for Tax (AFT) returns – can no longer be completed for any quarter from 1 April 2020 using the Pension Schemes Online service
 - New scams strategy from The Pensions Regulator

Bulletin Update contacts: Sally Wilson and Carrie Pearce

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Annexes

Annex 1: FPS Bulletin 59
Annex 2: FPS Bulletin 60
Annex 3: FPS Bulletin 61

FPS Bulletin 59 – July 2022

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

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

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

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Calendar of events

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

Table 1: Calendar of events

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

Actions arising

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

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

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

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

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

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

FPS

Administrator self-assessment survey results

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

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

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

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

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

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

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FPS 2006 special members – Corrective action

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

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

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

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

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

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

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

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

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

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

Service history data for transitional FPS 2015 members

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

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

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

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

Age discrimination remedy - Data sharing

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

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

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

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

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

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

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

Duradiamond - Contract extension

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

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

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

PFMAB Administration Team

Cathy Golson – Team Leader

Lorna Nyajeka – Appeals Coordinator

Email: pfmab@healthpartners.uk.com

Tel: 01273 963729

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Carole Scott – Relationship Manager

Email: carole.scott@healthpartners.uk.com

Tel: 01273 023042

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

Email: pfmabcontract@homeoffice.gov.uk

Technical query log

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

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

FPS England SAB updates

FPS 1992 Scotland – commutation provisions

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

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

2020 Valuation assumptions

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

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

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

Contingent decisions

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

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

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

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

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Membership, committees, and training

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

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

Software suppliers

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

Other News and Updates

Public Sector unions granted judicial review over McCloud cost remedy

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

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

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

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

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TPO Annual Report and Accounts for 2021/22

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

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

TPO McCloud factsheet published

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

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

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

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

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

TPR Annual Report and Accounts for 2021/22

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

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

Dashboard Accuracy Data Guidance

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

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

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

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

DWP responds to consultation on the draft pensions dashboards regulations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Standards and guidance

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

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

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

- connection guidance
- data usage guide
- early connection guidance

Call for Input on design standards

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

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

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

Support webinars

To support respondents, the PDP hosted three webinars:

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

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

Webinar for potential dashboard providers

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

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

Cyber Risk Made Simple Guide

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

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

HMRC

HMRC publishes Pension Schemes Newsletter 140 and 141

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

The newsletter includes articles:

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

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

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

The newsletter includes articles:

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

Clarification received on annual allowance changes

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

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

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

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

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

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

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

Legislation

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

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

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

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

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

Events

FPS coffee mornings

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

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

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

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

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

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

AGM – 25 and 26 October

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

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

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

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

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

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

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

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

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

We look forward to welcoming you to the event!

Useful links

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

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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.

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FPS Bulletin 60 – August 2022

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

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

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

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Calendar of events

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

Table 1: Calendar of events

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

Actions arising

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

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

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FPS

Age discrimination eligibility – Factsheet

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

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

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

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

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

Abatement guidance updated

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

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

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

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Electric vehicles salary sacrifice

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

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

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

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

Technical query log

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

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

No new queries have been added this month.

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FPS England SAB updates

SAB remedy engagement sessions

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

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

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

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

Other News and Updates

The Pensions Ombudsman (TPO) publishes corporate plan

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

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The Pension Regulator (TPR) publishes scam prevention strategy

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

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

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

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

Draft LGA response to PDP consultation and call for input

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

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

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

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

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

Data matching guidance updated

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

Guidance on Value Data for pensions dashboards

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

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

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

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

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Pension awareness campaigns

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

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

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

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

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

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

Events

FPS coffee mornings

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

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

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

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

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

AGM – 25 and 26 October

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

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

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

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

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

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

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

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

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

We look forward to welcoming you to the event!

Useful links

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

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FPS Bulletin 61 – September 2022

Welcome to issue 61 of the Firefighters' Pensions Schemes bulletin.

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

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

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Calendar of events

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

Table 1: Calendar of events

| Event | Date |
|------------------------------------|--|
| FPS coffee morning | 11 October 2022 |
| FPS Technical Group | 25 October 2022 |
| FPS AGM | 25 October 2022 26 October 2022 |
| SAB | 8 December 2022 |
| FPS Communications Working Group | 12 December 2022 |

Actions arising

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

[Member communications following eligibility factsheet](#): FRAs to send appropriate follow up communication to all originally determined out of scope individuals

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FPS

Immediate Detriment Framework guidance updated

Fire and Rescue Authorities (FRAs) will know that LGA is continuing to explore with the Fire Brigades Union (FBU) and respective legal representatives what, if any, amendments could be agreed to the Immediate Detriment Framework to minimise risk to FRAs and scheme members in light of previous statements from the Home Office and HM Treasury (HMT), and which would further assist FRAs in being able to process immediate detriment cases under that Framework. This includes seeking specialist legal advice where necessary.

Through the Framework, we are trying to find a way through potential issues for FRAs, to try to avoid future costly and time-consuming litigation and extended delay to scheme members, while ensuring that the risks are clearly highlighted, and scheme managers can make informed decisions.

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

When the amendments to the Framework are agreed, the guidance will be updated to reflect those changes.

Potential industrial action

As readers may be aware, the FBU is currently putting in place preparations for a ballot of their members for strike action. We therefore thought it would be useful to clearly set out the effect of taking strike action will have on an individual's pension rights.

All members are building up service in the FPS 2015 from 1 April 2022. An active scheme member may elect to pay contributions at their normal contribution rate, ascertained in accordance with regulation [110 \(2\) \(member contributions\)](#), multiplied by the assumed pensionable pay that the member is treated as receiving for the period of industrial action. In addition, the scheme employer may also require that

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the member pays the amount of employer contributions that the scheme employer would otherwise be required to pay by regulation [117\(3\) \(employer contributions\)](#).

An active FPS 2015 member includes any member with transitional membership of the FPS 1992 or 2006.

Any contributions must be paid before the end of a six-month period starting with the date on which the member is treated as receiving assumed pensionable pay. Only where contributions have been paid, will earned pension of 1/59.7th of the member's assumed pensionable pay during the absence due to industrial action be added to the active member's pension account.

As qualifying service in the FPS 2015 is added to qualifying service in the FPS 1992 or 2006 to determine whether a member with continuous transitional service qualifies for retirement benefits, any reduction in pensionable service due to industrial action will affect that date by the relevant number of days (for example, a member needs a minimum of 25 years across the FPS 1992/2015 combined to retire before age 55). Therefore, any days lost to industrial action, that the member chooses not to repay, should be reported by the FRA to their pension scheme administrator.

If strike absence takes the form of complete days, then each complete day of absence will be excluded from the total pensionable service. If strike absence takes the form of lesser periods, for example one-hour strikes, the LGA's informal view, is that, even though contributions have been paid for part of them, the days will not count at all because they are not fully completed days and an absence should therefore be recorded for the full day.

[Member communications following eligibility factsheet](#)

[FPS Bulletin 60 – August 2022](#) set out the eligibility criteria for individuals who are eligible for age discrimination remedy and should therefore be deemed in scope.

The bulletin confirmed that sample member communications were being worked on and that they would be made available later. We are pleased to confirm that the Fire Communications Working Group (FCWG) has now met and agreed the content of the letters.

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The Fire Technical Working Group (FTWG) suggested at its meeting of 25 July 2022 that all individuals originally determined out of scope should be revisited as best practice. It was agreed that individuals who are now considered to be in scope, after reviewing the [remedy eligibility factsheet](#), should be sent the follow up communication titled 'Originally out of scope - now in scope' and individuals who remain out of scope should be sent the follow up communication titled 'Originally out of scope - still out of scope'. The template letters are available on the [prospective remedy page](#) of the FPS Regulations and Guidance website.

Action: FRAs to send appropriate follow up communication to all individuals originally determined out of scope.

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.

No new queries have been added this month.

FPS England SAB updates

SAB levy 2022-23

Under arrangements for the Firefighters' Pension Scheme [2014 regulations 4H\(1\)](#), the Scheme Advisory Board (SAB) is required to set an annual budget for approval by the Secretary of State.

The 2022-23 budget will be submitted to the minister next week and we expect that the collection process will start in November/ December 2022. A letter will be sent to Chief Fire Officers to request a purchase order number.

Included in the final levy is the employers' voluntary subscription that FRAs entered into a shared agreement in 2014 in order to fund support with FRAs understanding and management of the FPS.

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SAB meeting 8 September 2022

The last SAB was held on 8 September 2022. Topics discussed were temporary in the context of the scheme, pensionable pay correction, the 2015 Remedy, and Pensions Dashboards.

The Board agreed the [minutes of the meeting held on 23 June 2022](#).

You can use the links below to find out about the latest updates on the work of the SAB and its committees:

- [SAB membership](#)
- [SAB meeting and agenda papers](#)
- [Committee meetings and agenda papers](#)

SAB remedy engagement sessions

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

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

The most recent sessions considered contributions and ill health.

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

SAB collaboration sessions on the Matthews remedy

In [FPS Bulletin 55 – March 2022](#) we confirmed that there would be a second options exercise to allow in-scope individuals the opportunity to purchase pension entitlement as a special member of the FPS 2006. To support scheme managers in the delivery of Matthews, the SAB, the LGA, and the Home Office are working together in the form of collaboration sessions on Matthews. The aim is to discuss

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Matthews legislation and policy, the interaction between Matthews and McCloud and the proposed timeline for implementation. The first session took place during September 2022. Additionally, a Matthews Technical Working Group has been set up to assist with the technical aspects of the project.

The LGA has published a [Matthews Project Implementation Document](#) (PID) which sets out the scope, deliverables, and high-level timeline for the project. The PID also includes a communications plan and draft terms of reference for the SAB working group.

Other News and Updates

TPR scheme return

The Pensions Regulator (TPR) is sending out scheme return notices to managers of public service pension schemes in October. Before submitting the scheme return, TPR is urging scheme managers to double check that their [details in Exchange](#) are correct.

Completing the scheme return is a legal requirement and if scheme managers fail to complete and submit it by the deadline, they could be fined. Find out more on TPR's website about [how to complete a scheme return for public service pension schemes](#).

TPR warns employers about auto-enrolment duties

On 26 September 2022, TPR published a [press release](#) warning employers to ensure they are complying with their automatic enrolment duties. The warning follows a series of in-depth compliance inspections with more than 20 large employers earlier this year. The employers are from the transport, hospitality, finance and retail sectors. TPR found several common errors in respect of calculating pension contributions and communications to staff.

PDP consultation response

As stated in [Bulletin 59](#), the Pensions Dashboards Programme (PDP) launched a [consultation on dashboard standards and guidance](#) and [call for Input on the design standards](#) on 19 July 2022.

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The LGA submitted a [response on these consultations](#) on behalf of the FPS. In relation to the code of connection and connection guidance, we stated that we understand that pension providers have a responsibility to assure themselves that a third-party provider has met all required standards. We will recommend that FRAs' Local Pension Boards play a key role in applying an appropriate level of scrutiny.

Additionally, we expressed concern that the 30-day connection timetable appears to be quite short and suggested that a flow chart is provided to help each party in the connection process.

In respect of the data standards and usage guidance, we noted that clarity has been given regarding the display of different sets of values to reflect a public service pension scheme member's choice of legacy or reformed scheme benefits for the age discrimination remedy period (McCloud), and that there is facility to display different tranches of benefits becoming payable at different dates.

We raised the need for the dashboard system to show appropriate caveats in relation to pension scheme members relying on this information where they are planning actual retirement income amounts and pointed out the impact and complications of calculating benefits in relation to Matthews by the staging date.

Our response on the design standards call for input broadly supported the dashboard programme's approach to design standards principles and assumptions, emphasising that information should be presented in a clear and understandable manner and that individuals must be able to understand the limitations of the data provided.

Public sector exit payments

On 8 August 2022, HM Treasury (HMT) issued a consultation on [proposals to limit exit payments](#). The Government is proposing to introduce:

- An expanded approval process for employee exits and special severance payments
- Additional reporting requirements

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If implemented, the proposals would apply to all bodies that are classified as ‘Central Government’. This does not include local authorities or bodies under devolved administration. Following discussion with the Home Office, we can confirm that the definition of ‘local authorities’ expands to cover the following:

- Fire and Rescue Authorities
- Fire and Rescue Services
- London Fire and Emergency Planning Authority
- Police and Crime Commissioners

We confirmed in [FPS Bulletin 57 – May 2022](#) that the [statutory guidance on special severance payments](#) published by the Department for Levelling Up Housing and Communities (DLUHC) also does not apply to FRAs.

Pensions awareness campaign postponed

Following the death of Her Majesty Queen Elizabeth II, the pension awareness campaign planned for 12 to 16 September was postponed. It will now take place between 31 October and 4 November.

See [Bulletin 60](#) for information about the campaign.

HMRC

HMRC publishes Pension Schemes Newsletter 142

On 31 August 2022, [HMRC published pension schemes newsletter 142](#). The newsletter includes the following articles:

- Normal minimum pension age – updates to the Pensions Tax Manual
- Migrating your pension schemes – take action now
- Accounting for Tax (AFT) returns – can no longer be completed for any quarter from 1 April 2020 using the Pension Schemes Online service
- New scams strategy from The Pensions Regulator – see [Bulletin 60](#) for more information

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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 11 October.

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

[6 September 2022 – Immediate and deferred choice](#)

[27 September 2022 – Matthews communications](#)

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

AGM – 25 and 26 October

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

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

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

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

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

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

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

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

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

We look forward to welcoming you to the event!

Useful links

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

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- [Welsh Government Fire circulars](#)

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| F30 | Business Operations have raised a risk in respect of Transfer to third party administrator. The change comes right at the heart of the testing programme for Unit 4/DB&I delivery. With a SAP freeze in place because of the DB&I programme it is going to be very challenging to design/test/deliver reporting for the new provider for 1 Aug AND design/test/deliver it again for the Unit 4 system in time to go-live with that system in December. There is not the resource to do this. | Bus Ops | | 2 | 2 | 3 | 7 | 4 | 28 | TREAT- 1) Had a meeting with business ops on 22 February 2021. Outcome was agreement to look into an annual data submission in March which would allow for new system to be in place and reports built. 2) Year end data was sent to XPS by end of April 2022. The GL mapping has been finalised. 3) A 'go -live' date has not yet been confirmed by SCC and it is not estimated to be live before the end of 2022. Once Unit 4 is in use, monthly data transfers with XPS will be able to take place via i-connect. | PJ | | 1 | 1 | 4 | 6 | 2 | 12 | Nov-22 |
| F32 | Modified scheme. Communications have been sent to affected members to provide a further opportunity for those who did not respond to previous mailing to confirm if they want further information on the second option to join the modified scheme. However there have been no further updates from the Government as to when the scheme will reopen. This may cause members further and prolonged frustrations. | SW / PJ / CP | 2 | 4 | 5 | 11 | 3 | 33 | TREAT 1) Open and transparent communications are to be sent regularly to keep affected members up to date. 2) Update from the Government has been received in March 2022 as to when the second options exercise will open (October 2023). Calculations cannot be finalised as there are a number of standard assumptions which the Home Office need to confirm first. It is unknown as to when the standard assumptions will be completed and shared to FRA's. | SW / PJ / CP | 2 | 3 | 3 | 8 | 3 | 24 | Nov-22 | | |
| F33 | 10% Project As part of this project, SFRS will be required to pay contributions to the pension pot for members pensions in relation to the 10% allowance the member received at the time of employment which were not previously pensionable. SFRS will also need to pay members additional amounts in terms of lump sums and pension arrears. It is not yet known if this will be covered by the pension top up grant received each year. Additionally there may also be Unauthorised Payment Charges or tax contributions which the Service will be required to pay due to the length of time which has passed since the original lump sums were paid and also the amount of the lump sum. | SW / AT | | 2 | 3 | 4 | 9 | 3 | 27 | TREAT 1) Andy Tink to be informed and guidance to be sought from him 2) Monitoring of the costs involved as the calculations are being completed 3) Plan to knowledge transfer from SME's to pension team staff or even consider if a business case for a new team member is required 4) A budget has been created to identify how much the costs are for the project and is updated as the calculations for each priority group are finalised. Legal advice is required to confirm the tax needed for the pension arrears lump sum. This has been requested from Weightmans. 5) Legal advice has been received and the Service are now happy with their position. The project is due to recommence shortly. Pension arrears and pension lump sums will be liable for unauthorised payment charges and surcharges. | AT / PJ / CP | | 2 | 2 | 3 | 7 | 3 | 21 | Nov-22 |

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| F37 | <p>Incorrect pensionable pay and salary details submitted to XPS.</p> <p>After the Pension Saving Statements (PSS) were sent out late in January 2022, XPS were made aware from some of our members that their pay information was incorrect. The Service has been working with XPS on this to understand where the discrepancies between the salaries and pensionable pay of these members originated from.</p> <p>For the ten members who were sent PSS, the incorrect salary information may mean they have incurred annual allowance charges which need to be paid and reported. The members have until end of July to confirm if they would like to utilise the scheme pays option. This is a complex matter and there are concerns the revised PSS' may not be sent to members in time.</p> <p>Additionally, from looking into the data, it seems the incorrect salary information is not isolated to these ten members and will affect all our members. This will also have an impact for all members to calculate their pension accurately.</p> <p>Investigations are underway to resolve this.</p> | SW | 2 | 2 | 3 | 7 | 2 | 14 | <p>TREAT:</p> <p>1) The Senior Finance Partner has carried out a labour intensive exercise and has reviewed the salary information available to try and identify the root cause of why there are discrepancies in the salary data.</p> <p>2) It has been identified that certain firefighter allowances had been included to salaries in some financial years, but not all financial years, among other issues.</p> <p>3) The priority list (those who received PSS') has now been compiled and completed and that data has been provided to XPS who can now recalculate the PSS'.</p> <p>4) Regular meetings have taken place to try and resolve this issue and should members have an annual allowance charge, they have until 31st July 2022 to utilise the 'scheme pays' method, should members wish to do so. Otherwise members may/will have to pay for the annual allowance charges themselves.</p> <p>5) An extensive review regarding has now been completed. There were no errors with the pensionable pay data in relation to the FPS 2015 scheme yet the salary information was inconsistent in relation to the FPS 1992 scheme due to the inclusion of CPD payments. A detailed spreadsheet was submitted to XPS so it could be understood where CPD payments were or were not included in pensionable pay.</p> | SW / PJ | 2 | 2 | 3 | 7 | 2 | 14 | Nov-22 |
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