

Notice of Meeting

Surrey Local Firefighters' Pension Board

**Date & time**

Friday, 24 February
2023 at 10.30 am

Place

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

Contact

Joss Butler
joss.butler@surreycc.gov.uk

Chief Executive

Joanna Killian

Members

Nick Harrison (Employer Representative (Firefighters' Pension Scheme)) (Chairman)
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: 10 NOVEMBER 2022

(Pages 5
- 12)

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 (20 February 2023).
2. The deadline for public questions is seven days before the meeting (17 February 2023)
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
13 - 20)

The Board to note the Action and Recommendation Tracker

6 SCHEME MANAGER UPDATE REPORT

(Pages
21 - 24)

The Board to note an update on Scheme management activities.

7 XPS - SURREY FIRE & RESCUE AUTHORITY PENSION BOARD REPORT

(Pages
25 - 38)

To note an update report from XPS.

8 RISK REGISTER

(Pages
39 - 48)

To note the risk register.

9 FIRE BULLETINS

(Pages
49 - 116)

To note the fire bulletins from October 2022, November 2022, December 2022 and January 2023.

10 DATE OF THE NEXT MEETING

The next meeting will take place on 27 April 2023.

**Joanna Killian
Chief Executive**

Published: 16 February 2023

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MINUTES of the meeting of the **SURREY LOCAL FIREFIGHTERS' PENSION BOARD** held at 10.00 am on 10 November 2022 at Committee Room, Woodhatch Place, 11 Cockshot Hill, Reigate, Surrey, RH2 8EF.

These minutes are subject to confirmation by the Committee at its meeting on Friday, 24 February 2023.

(* present)

Elected Members:

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

31/22 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS [Item 1]

Apologies were received from Paul Bowyer.

Paul Bowyer attended the meeting virtually.

32/22 MINUTES FROM THE PREVIOUS MEETING: 28 JULY 2022 [Item 2]

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

33/22 DECLARATIONS OF INTEREST [Item 3]

None received.

34/22 QUESTIONS AND PETITIONS [Item 4]

There were none.

35/22 SURREY FIREFIGHTERS' PENSION BOARD ACTION AND RECOMMENDATION TRACKER [Item 5]

Witnesses:

Sally Wilson, Scheme Manger

Key points raised during the meeting:

1. The Chairman introduced the item and thanked officers for their work to update the action tracker and stated that it was now a more succinct document.
2. In regard to Action A1/20, the Scheme Manager noted that the GAD exercise was now underway. The scheme Manager also stated that the majority of the action updates were also noted within the Scheme Manager Update Report
3. In Regard to A20/20, the Scheme Manager highlighted that XPS were due to provide data extracts and had stated that the exercise was due to be completed in mid-November. The Chairman acknowledged that the exercise had taken some time to progress.

4. The Vice-Chairman provided feedback on the action tracker document. It was suggested that the job title 'Head of Data, Digital & Special Projects' should be updated to 'Scheme Manager'. Further to this the Vice-Chairman proposed that action A9/21 be closed which was agreed by the Board.
5. The Vice-Chairman proposed that action A1/22 was amalgamated with action A16/20 as there was significant overlap. The Board agreed to combine the two actions.
6. The Board agreed to close the completed actions.

Actions / further information to be received:

Job title 'Head of Data, Digital & Special Projects' to be updated to 'Scheme Manager'.

A9/21 – CLOSE

A1/22 & A16/20 – COMBINE

Completed Actions – CLOSE

Resolved:

The Board noted the report.

36/22 SCHEME MANAGEMENT UPDATE REPORT [Item 6]

Witnesses:

Sally Wilson, Scheme Manager

Key points raised during the discussion:

1. The Scheme Manager introduced the report and provided a brief summary. Members noted:
 - a. In regard to Age Discrimination, good progress had been made on the data collection exercise and that it was due for completion.
 - b. the Service were notified at the end of October 2022 and via the FBU website of the compensation some of the Service's members were set to receive following complaints logged regarding the closure of the 1992 and 2006 pensions schemes. Officers were still awaiting details on how this would progress. The Chairman asked for detail on which organisation would provide the compensation noted within paragraph 2.4 of the report. The Scheme Manager said that officers were waiting for more information however it was believed that the funds would be provided by the Government. A Board Member provided further detail on the matter and explained that the Fire Brigade Union (FBU) were reviewing responses to the survey and that claims made in 2015 would be processed first then claims made in 2020 would be processed next.
 - c. In regard to 10% Pensionable Allowances, the Scheme Manager explained that the service had met with the FBU during the summer period and that the Service had not received any further feedback or details of the legal advice the FBU had

- gained. Further to this, Members noted that calculations had been finalised for all Priority Groups apart from Priority Group Seven. The calculations for this cohort were in progress.
- d. Details related to the Modified Scheme as noted within the action tracker.
 - e. In regard to pension policy, the Pension Project Team had created an overarching policy for the Service's pensions. Amendments had been made to the policy which was at the final stage of approval before it is placed onto SharePoint for the members of the Service to access. The Chairman suggested that, following approval, the final version of the document was brought to the Board for noting, which was agreed.
 - f. That the internal Audit Team at Surrey County Council had 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. The Scheme Manager noted that the outcomes to the audit would be brought to the next Board meeting for consideration.
 - g. That a business case had been approved for a Pensions Support Assistant to join the Pension team and that the service was working through the recruitment process.
 - h. That the creation of an ill health retirement policy is underway and was due to be available for review in early 2023. In the interim, quarterly meetings continued to take place with the Employee Relations Partner, Senior Pensions Advisor, Scheme Manager and an external Operational Health colleague.
 - i. In regard to incorrect pensionable pay, Members noted that an extensive review regarding the reasons for the incorrect pensionable pay and salary information passed to XPS from the Service had been completed and that it appeared that there were no errors with the pensionable pay data for members contributing to the FPS 2015 scheme. However some salary information was inconsistent for members who had contributed to the FPS 1992 scheme before its 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.
 - j. That the service had circulated information to members on the potential impacts of any industrial action.
2. The Vice-Chairman proposed that a risk related to incorrect pensionable pay was closed which was agreed by the Board.
 3. The Chairman stated that the list of tasks and topics found on page 20 of the agenda was helpful. The Chairman further stated that he appreciated the information provided within the report and its new layout and found it to be very helpful.

Actions/ further information to be provided:

A8/22 – The Board to receive the new Pension Policy following approval at a future meeting for noting.

Resolved:

The Board noted the report.

**37/22 XPS - SURREY FIRE & RESCUE AUTHORITY PENSION BOARD REPORT
[Item 7]**

Witnesses:

Paul Mudd, XPS

Key points raised during the discussion:

1. The representative from XPS introduced the item and provided a summary of its content. The following details were noted:
 - a. That following discussions with XPS's existing supplier, they had decided to retain their services and would be able to commence the mortality and address cleanse towards the end of October following the payroll cycle.
 - b. Provided an update on conditional data testing, scheme returns and the annual benefit statements and pension savings statements as outlined in the report. In regard to Scheme Returns, the Scheme Manager confirmed that they had received a draft version and had provided feedback. The Chairman requested that the document be circulated to the Board for information.
 - c. Noted the information which needed to be sent to the National Fraud Initiative by mid-November 2022.
 - d. Provided detail on Member Self-Service and explained that XPS sought to record a demonstration of the Member Self-Service to help members of the scheme navigate the system and find the information they need.
 - e. Noted that the Contact Centre had been live for five weeks.
 - f. That the common data was mostly unchanged however it was expected to see a change in the address data as mortality screening progressed.
 - g. In regard to membership, Members noted an increase in active members.
 - h. Stated that XPS expected the number to completed cases to increase as work progressed.
 - i. In regard to completed cases, the Chairman highlighted that the overall number of cases was relatively low and therefore each case update had an obvious impact on the percentage of completed cases.
 - j. Provided an overview of the task analysis as noted in the report. The Chairman requested that the previous quarter's task analysis was included in future reports.
2. In regard to the Annual Benefit Statement, a substitute member present at the meeting stated that they were able to find the percentage of annual allowance used in the scheme year but was unable to find the percentage of lifetime allowance. The representative from XPS said that he would speak to his team about whether it could be included going forward and that the Annual Benefit Statement template was due for review. The Chairman said that he agreed it would be helpful to have the percentage included.

3. A substitute member present at the meeting highlighted an issue related to a payment made to employees in lieu of overtime and that it was later determined that holiday pay was due so the payment was treated as pensionable when it should not have been. The Scheme Manager stated that communication had been circulated on the matter and that the issue should be rectified by the end of the month. It was further noted that the error was because the administration was treated the same as the Local Government Pension Scheme (LGPS) however business services were informed of the error and it should not happen again.
4. A Member of the Board said that he was aware of issues raised by members of the scheme that had not received a responses by XPS, and asked whether those issues could be raised a the board meeting. The Scheme Manager said that the first point of contact for issues should be the Surrey Pension Team.
5. A Member asked for detail on the parameters for a complaint to be considered a 'formal complaint' as he was aware of three complaints made that had not been reported within the report being considered. The Member further stated that they were unable to locate a complaints procedure on the website. The representative from XPS said that the complaints procedure was available on the 'contact' area of the website and that XPS sought to resolve complaints within 10 working days. The representative agreed to send a link to the procedure outside the meeting The Chairman requested that the member of the Board and the representative from XPS provide an update at the next meeting on whether the complaints had been resolved, and for the representative from XPS to provide more information on the complaint process and the reasons why the three complaints were not recorded as formal complaints. Following further discussion, the representative stated that they would ensure that a 'complaint' section on the drop-down list within the 'Contact' webpage was available to select if needed.
6. The Scheme Manager asked that the pension reform email address was copied into any complaints sent to XPS.

Actions / Further information to be provided:

A9/22 - That the draft Scheme Return document be circulated to the Board for information

A10/22 - Glyn Parry-Jones and the representative from XPS to provide an update at the February 2023 meeting on whether the complaints had been resolved, and for the representative from XPS to provide more information on the complaint process and the reasons why the three complaints noted were not recorded as formal complaints.

Resolved:

The board noted the report.

38/22 FIRE BULLETINS [Item 8]

Witnesses:

Sally Wilson, Scheme Manager

Key points raised during the discussion:

1. The Scheme Manager introduced the report.
2. The Chairman noted that he attended the first day of the Firefighters' Pension Scheme Conference.
3. The Chairman noted detail of the strategy to combat pension scams and asked the representative from XPS to provide detail on what XPS was doing to combat scams. The representative explained that there were a number of challenge-points in place when a member sought to transfer funds to check whether they were being coerced to do so and were aware of any fees. The representative agreed to provide a report on the subject at the next meeting.
4. The Chairman said that he appreciated the summary on action points included.

Actions/ further information to be provided:

A11/22 – The representative from XPS agreed to provide a report on the strategy in place to combat pensions scams at the February 2023 Board meeting.

Resolved:

The committee noted the report.

39/22 RISK REGISTER [Item 9]**Witnesses:**

Sally Wilson, Scheme Manager

Key points raised during the discussion:

1. The Scheme Manager introduced the report.
2. The Vice-Chairman highlighted that Risk F28 was a green risk and with mitigation remained green so questioned whether the risk was required to be on the tracker. The Scheme Manager said that the risk register was due to be rereviewed to align with the county council's risk procedure and that with this was an opportunity to close green risks where appropriate.
3. The Scheme Manager proposed to close risk F29 as it was covered between F8 and F34. The Board agreed to close the risk.
4. The Scheme Manager noted that Risk F37 would be closed as it was no longer required.
5. In regard to Risk F1, the Chairman suggested that the comments made by XPS regarding data improvements be included as an action being undertaken.
6. In regard to F11, the Chairman suggested that the board consider the risk in detail at a future meeting. The Scheme Manager suggested that, following a review of the risk register, the Board consider one or two risks at each meeting to allow a better understanding by the board. The Board agreed to the proposal.
7. In regard to Risk F25, the Chairman highlighted that point 4 was missing some wording and asked that it be corrected.
8. In regard to Risk F9i, the Chairman suggested that it be consolidated with Risk F34 which was agreed.

9. The Vice-Chairman suggested that there was an opportunity to adjust scoring for each risk when considering issues raised by members of the scheme.
10. The Chairman suggested that the Firefighters' Pension Team meet with the Surrey LGPS Team to discuss their administration of their risk register and share best practice.

Actions/ further information to be provided:

Risk F29 – CLOSE

Risk F37 - CLOSE

Risk F1 - That comments made by XPS regarding data improvements be included as an action being undertaken.

Risk F25 – to correct missing wording

Risk F9i & Risk F34 – COMBINE

A12/22 – The board to consider one or two risks, and mitigating actions in place, in detail at each meeting

Resolved:

The Board noted the document.

40/22 DATE OF THE NEXT MEETING [Item 10]

The Board noted the date of the next meeting.

Meeting ended at: 11.10 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 (Eol) 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 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 selected the Service to complete a data on our affected members. This was due by 25 November 2022. Additionally, whilst Eol forms were sent to affected</p>	Ongoing

Item 5

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				<p>members, the LGA have notified the Service that due to the changes in legislation, it is likely the new version of the EoI 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>February 2023: The data collection exercise was completed and submitted by the 25 November 2022. No further updates have been received from the LGA or Home Office on this project.</p>	
<p>30 April 2020</p> <p>A16/20 & A1/22 (combined)</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>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>Ongoing</p>
<p>13 January 2022</p> <p>A1/22</p>	<p>Surrey Local Firefighters' Pension Board Actions and Recommendations Tracker</p>	<p>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.</p>		<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 the Priority Group 1 letters were sent, the Service was contacted by the FBU who confirmed they were seeking legal advice. The Pensions Project Team made</p>	

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				<p>the decision to pause communicating to other cohorts in case the FBU feedback required an alternative method or message to be adopted. FOA were informed. 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. The communications with the FBU are still underway. Therefore, the timeline has not been updated since January 2022.</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>The project timeline will be updated and circulated to the Board shortly.</p> <p>February 2023: Feedback from the FBU is still pending. Members of Priority Group 2, were contacted in</p>	

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				November 2022. Members of Priority Group 3 (those who retired prior to 2014) are due to be contacted in February 2023.	
30 April 2020 A20/20 (Informal meeting due to Covid-19)	Administration Update (1 January 2020 - 31 March 2020)	The Pensions Support & Development Manager will liaise with the Assistant Chief Fire Officer – Service Support on the next steps concerning the Guaranteed Minimum Pension (GMP) reconciliation - the new Project Manager to assist.	Scheme Manager	<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>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>	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				<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> <p>February 2023: The data extracts from XPS were not provided in time to the Service which meant Mercer would not be able to complete the rectification exercise prior to the pensions increase. Mercer are reviewing the data extracts, additional costs will be incurred for the work completed. It is anticipated the project will be finalised by the end of 2023.</p>	
25 November 2021 A7/21	XPS Administration - Surrey Fire and Rescue Service Pension Board Report	For the Assistant Chief Fire Officer – Service Support to work with XPS to use a tracing service to confirm addresses for those past retirement or within two years of retirement.	Scheme Manager	<p>January 2022: XPS confirmed that they were in the process of obtaining costs to undertake address tracing.</p> <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>	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				February 2023: XPS submitted in January the data to their supplier for the address tracing exercise. A verbal update should be provided at the Local Pension Board meeting. XPS will write to the old and the new addresses to confirm the correct address to use.	
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.	Scheme Manager	<p>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.</p> <p>February 2023: A review of The Pension Regulator (TPR) six key processes has been completed and will be shared with Board members. A review of our policies and processes will take place over the coming months. The next TPR survey is due for completion by 17 February 2023. Any insights from the survey results will be taken on board.</p>	Ongoing
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.	Scheme Manager	<p>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.</p> <p>February 2023: This is an extensive piece of work and currently there is not the resource to do this. However, the uptake of members creating an account on the member’s self-service portal continues to increase</p>	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				which provides a further platform to gain information from members.	
10 November 2022 A8/22	Scheme Management Update Report	The Board to note the new Pension Policy following approval at a future meeting	Scheme Manager	February 2023: On 21 December 2022, the Board were notified of the Pensions SharePoint site which is available to active members of staff. The pension policy can be located on this site.	Ongoing
10 November 2022 A9/22	XPS – Surrey Fire & Rescue Pension Board Report	That the draft Scheme Return document be circulated to the Board for information	Scheme Manager	February 2023: XPS completed the Scheme Returns on behalf of the Service for the three pension schemes (FPS 1992, NFPS 2006 and CARE 2015). The Scheme Returns were submitted on 18 November 2022.	To be closed
10 November 2023 A10/22	XPS – Surrey Fire & Rescue Pension Board Report	Board member and XPS representative to provide an update at the February 2023 meeting on whether the complaints had been resolved, and for the representative from XPS to provide more information on the complaint process and the reasons why the three complaints noted were not recorded as formal complaints.	XPS Board Member	February 2023: Update to be provided at the Local Pension Board Meeting	Ongoing
10 November 2023 A11/22	Fire Bulletins	The representative from XPS agreed to provide a report on the XPS strategy in place to combat pensions scams at the February 2023 Board meeting.	XPS		Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
10 November 2023 A12/22	Risk Register	The board to consider one or two risks, and mitigating actions in place, in detail at each meeting	Scheme Manager	February 2023: due to the implementation of the new risk register format, the Board will consider two actions in detail at the April 2023 meeting.	Ongoing



Surrey Local Firefighters' Pension Board 24 February 2023

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 Subject Matter Experts (SMEs) within the Pensions 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 wider Pensions Team have not been able to assist with the data collection exercise until very recently, as they did not have the required access to the payroll data. This has now been resolved and the team are able to assist.

2.2 The initial deadline for the submission of the data collection exercise was 31 December 2022. However due to the complexities of the task and the impact of the Matthews data collection exercise, the deadline was not met. A revised internal timeline has been agreed with XPS, whereby the Service will submit the first data return by the end of February 2023.

2.3 At the end of October 2022 the FBU website communicated compensation was due to be awarded to union members following complaints which were logged regarding the closure of the 1992 and 2006 pensions schemes. It has been confirmed the FBU will remain as the sole contact for the any members of the Service who placed complaints and compensation will be covered by Government. The final outcome of the compensation to be awarded is yet to be finalised.

10% Pensionable Allowance

2.4 In October 2022, the Pensions Team recommenced the 10% pensionable allowances project. All members in Priority Group 1 who had not paid their contributions, and all members of Priority Group 2 (members who retired since 2014) were contacted in November 2022.

2.5 In Priority Group 2, 20 members out of the 35 members have paid the contributions. Those who are due additional payments, have received or will shortly receive their additional pension payments and increases to monthly pension benefits. Members of Priority Group 3 will be sent their respective letters in February 2023.

2.6 The Finance Team have received regular updates from the Pension Teams of the monies which need to be covered by the Service in relation to this exercise. This project continues to be recorded as a financial risk and monitored through budget monitoring.

Matthews - Modified Scheme – On-Call Access

2.7 The Pensions Team is pleased to report the data collection exercise for the Matthews project was submitted to the LGA by the deadline of 25th November 2022. This was an extensive piece of work with a short turnaround time which took priority over the McCloud data collection exercise. No further updates have been provided to FRA's on this project.

Pension Policies

2.8 The Board is invited to note, the creation of an overarching policy for the Service's pensions. This has now been approved and is available to all active members on the Pensions dedicated SharePoint site. A link to the site was shared with all Board members on 21 December 2022.

2.9 It was identified early 2022 that an abatement policy was required. A first draft of the policy has been completed and will shortly be reviewed by the Scheme Manager and Workforce Working Group.

Audit

2.10 Following from the audit of the contract between XPS Administration and Surrey Fire and Rescue Service, work is already underway to meet the agree actions.

- The KPI scores achieved by XPS have increased significantly since the audit took place and are currently not a concern.
- The KPI list has been reviewed and XPS have confirmed the categories we thought were not included are covered under existing indicators.
- FRA's within the Regional Fire Pension Officer Group have been contacted to ascertain the costs they have been provided with. Of the costs other FRA's are aware of – namely the software costs - these currently seem on par with the fees shared to the Service.
- Conversations surrounding access to data are still underway. However XPS submit data to the Service when requested and the Service is able to access some of its information via the XPS Employer Portal.
- Discussions are still ongoing with the procurement team around including items which were not previously included in our contract – such as accessing our data without requesting reports.

Pension Team Resourcing

2.11 The Pensions Team are pleased to report the role of Pensions Support Assistant has been filled and the new member joined the team on 1 February 2023. The role is on an 18-month fixed term contract, and will support the team over a number of different activities across all projects.

Pensions Dashboard

2.12 A meeting has been scheduled to take place with XPS Administration for early March 2023, to go through the pensions dashboard and work to be completed by the Service ahead of the 30 September 2024 staging date.

The Pensions Regulator (TPR): Public Service Governance & Administration Survey 2022-2023

2.13 The Pensions Team has been notified of TPR's Public Service Governance and Administration Survey. This is the first time this survey has taken place since 2021 due to COVID. The aim of the survey is to determine how schemes are working towards the expected standards. The deadline for the survey is 17 February, which will be completed by the Pensions Team and the Chair of the Local Pension Board.

Communications

2.14 The following communications have been sent since the last local Pension Board meeting took place:

- 10% Allowance Project – letters were sent to the remaining Priority Group 1 members and all members of Priority Group 2. Informing the cohorts of the pension contributions which need to be paid. Sent via letter on 23 November 2022.
- Factors to note when considering opting out of the Firefighters Pension Scheme – sent via SFRS News on 25 November 2022.
- Retiring in 2023 and the McCloud legislation - sent via SFRS News on 9 December 2022.
- Details of the new Pensions Information Page on SharePoint – sent via SFRS News on 20 January 2023.

Guaranteed Minimum Pension (GMP) Reconciliation

2.15 The Service has been liaising with Mercer and XPS in order to finalise the GMP project. It is hoped the reconciliation (the project), will be completed by the end of 2023. Confirmation of this is pending from Mercer.

Training from the LGA

2.16 Training for the members of the Local Firefighter's Pension Board has been scheduled for April 2023. The LGA will provide an update to the Board of key issues facing the industry.

2.17 From the training the LGA delivered in March 2022 to the Board, a number of actions were highlighted. These actions are applicable to all FRA's in England. An update of the progress the Service has made on the actions can be found on the next page:

Project	LGA Advised Actions	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 Independent Qualified Medical Practitioner (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. Ongoing 7. Underway 8. Completed 9. Underway
McCloud - 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 processes followed 	<ol style="list-style-type: none"> 1. Underway 2. To action 3. Ongoing

Risk Management

2.18 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: N/A



Surrey Fire & Rescue Authority

Pension Board Report

2022/2023 – Q3

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

October 2022

LGA issued bulletin 62

Key points:-

Matthews – FPS member website update

LGA have recently added some additional commentary to the FPS member website around the second options exercise.

Matthews – member warm up communications

LGA have uploaded generic template letters for both in scope and out of scope retained firefighters. FRA's are strongly recommended to use these templates where appropriate.

Fire and Rescue workforce and pension statistics published

The Home Office published the statistics which covers a period from April 2021 to March 2022 and reflect data returns on income, expenditure and membership submitted by all 44 FRA's in England.

Actions required: -

- Independent Qualified Medical Practitioners:

LGA would like all FRA's to provide them with a list of the Independent Qualified Medical Practitioners they use and their contact details.

- XPS attended LGA Fire Pension Scheme AGM – 25th & 26th October

November 2022

LGA issued bulletin 63

Key points:-

Ill-health factsheet on reassessment cases

LGA remind FRA's that a re-assessment of ill-health entitlement will not be needed in every case, it is only where, under rollback, the individual would qualify for alternative ill-health benefits and the assessment criteria under the regulations sets a lower qualifying bar.

Actions required: -

- Age discrimination remedy – Ill-health factsheet on re-assessment of cases:

FRAs to review the ill health re-assessment factsheet and ensure that appropriate action is taken where necessary.

- SAB levy 2022-23 – Request for Purchase Order numbers:

FRAs to provide a valid purchase order number, stating the number of employees eligible to join one of the Firefighters' Pension Schemes as of 1 April 2022, using the form provided with the SAB 2022-23 levy letter.

- Consultation on The Public Services Pension Scheme (rectification of unlawful discrimination) (Tax) regulations 2023:

FRAs and administrators are encouraged to respond to the consultation.

December 2022

LGA issued bulletin 64

Key points:-

Independent Qualified Medical Practitioner (IQMP) - Central list

Several IQMP's have given their permission for LGA to publicise their contact information on the protected area of the FPS Regulations and Guidance website.

Retrospective Remedy Webpage

LGA has created a new webpage for retrospective remedy. The page contains useful information and documents about the retrospective remedy.

Retained firefighter Employment Tribunal pension claims

LGA ask all FRA's to be alert to the receipt of Employment Tribunal claims brought on behalf of retained firefighters and inform the LGA immediately on receipt.

Actions required: -

- Deferred connection guidance published:

FRAs who meet the limited circumstances and want to apply to defer dashboard connection, must email pensionsdashboard@DWP.gov.uk as soon as possible and before 12 December 2023.

- Early connection guidance updated:

FRAs should decide as soon as possible if they want to connect early to dashboards and apply to MaPS when application forms are available.

- HMRC publishes pension schemes newsletter 145:

FRAs and administrators to remind members who do not have enough carry forward to offset a tax charge for 2021 to 2022 to declare this on their self-assessment tax return.

Additional Work / Previous Minutes

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

Discussions have concluded with our supplier in respect of the new terms and conditions for address screening services. Data has been submitted in January and it is expected that a verbal update, will be available for the Board once we have received the output and worked through any amendments.

XPS will be writing to the old and the new address, where applicable, in order to ensure that we are not amending an address to something that it shouldn't be.

Where we have completed exercises such as this in the past, it has proven to be a very worthwhile exercise.

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.

Our central business function is working through the data set we have sent to them in order to build the tests necessary for this scoring and validation exercise.

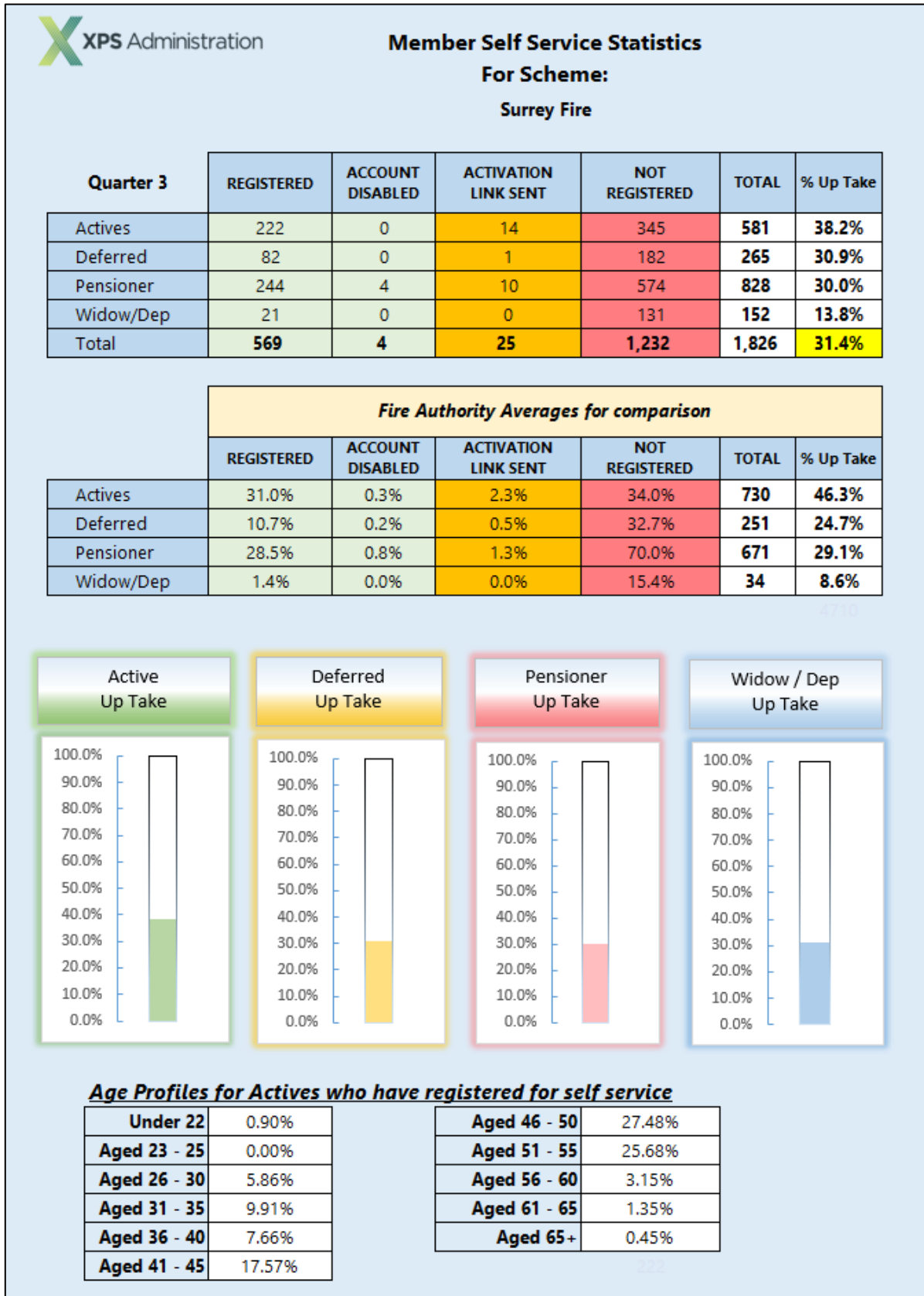
Meetings are due to take place in February with the initial mapping results, from there, we will contact the service with regards to next steps.

Governance and Administration Survey

The annual Governance and Administration questionnaire is being distributed to all public sector pension schemes. XPS are happy to work with the Service and the Chair of the Pensions Board (suggested by the tPR), to complete this by the required deadline of 17th February.

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				57	
Data Test	Common data score			Previous Quarter	
	Max Population	Total Fails	% OK	Total Fails	% OK
NINO	2303	2	99.91%	2	99.91%
Surname	2303	0	100.00%	0	100.00%
Forename / Inits	2303	0	100.00%	0	100.00%
Sex	2303	0	100.00%	0	100.00%
Title	2303	0	100.00%	0	100.00%
DoB Present	2303	0	100.00%	0	100.00%
Dob Consistent	2303	0	100.00%	0	100.00%
DJS	2303	0	100.00%	0	100.00%
Status	2303	0	100.00%	0	100.00%
Last Status Event	2303	1	99.96%	1	99.96%
Status Date	2303	18	99.22%	21	99.09%
No Address	2303	13	99.44%	13	99.44%
No Postcode	2303	19	99.17%	19	99.18%
Address (All)	2303	55	97.61%	54	97.66%
Postcode (All)	2303	61	97.35%	60	97.40%
Members with a Fail	2303	25	98.91%	28	98.79%
Members with Multiple Fails	2303	56	97.57%	55	97.62%
Total Fails	2303	81	96.48%	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

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.

Quarter 3 2022 - 2023

Scheme	Actives	Deferred	Pensioner	Widow	Dependant
Old-FPS	0 -	72 ▼	790 ▲	141 ▲	8 -
New-NFPS	2 -	96 ▲	21 ▲	0 -	0 -
CARE - 2015	587 ▼	92 ▲	15 ▲	2 -	1 -
Total	589 ▼	260 ▲	826 ▲	143 ▲	9 -

Quarter 2 2022 - 2023

Scheme	Actives	Deferred	Pensioner	Widow	Dependant
Old-FPS	0 -	75 ▲	787 ▲	140 ▼	8 -
New-NFPS	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-FPS	0 ▼	76 ▼	782 ▼	141 ▼	8 -
New-NFPS	4 ▼	94 ▲	19 ▲	0 -	0 -
CARE - 2015	521 ▼	83 ▲	7 ▲	2 ▼	1 -
Total	525 ▼	253 ▼	808 ▼	143 ▼	9 -

Previous Quarter 4

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

Please note all active member records have been moved across to the 2015 scheme with effect from 1/4/2022. The reducing active numbers within non-CARE – 2015 are where records are being cleansed. The two record still denoted as in legacy schemes are to be deleted.

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	47	46	1	98%
November	41	40	1	98%
December	23	23	0	100%
Quarter 3	111	109	2	98%
January				
February				
March				
Quarter 4				
Year - Total	430	366	64	85%

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.

Quarter 3 KPI statistics were 98% with 109 cases out of 111 being completed on time. Of the two cases completed slightly late we had:

October - One general case. This related to a query from a third party asking for contact details for the member and there was a delay in letting them know that we could not assist due to GDPR.

November – One general case. This related to a member who had contacted us regarding viewing the benefits earned from his Added Years contract on his Annual Benefit Statement and wanted us to contact him to explain the position. Due to a communication error over who was dealing with this there was a delay in responding, but an apology for this was offered and the query resolved.

The KPI statistics for quarter 3 show a significant improvement on both quarter 2, which was 83%, and quarter 1 which was 79%. This is a result of increased recruitment and training and the setting up of dedicated call handlers within the unit to allow the more experienced staff to focus on more complex work. We are hopeful of seeing sustained results in future quarters, but we will continue to monitor our performance very closely.

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.

October 2022

October 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	4	4	100
Divorce Cases	30	100	1	1	100
Estimates	10	100	4	4	100
General	10	100	23	22	96
Processing new entrants	10	90	0	0	0
Refunds	10	100	0	0	0
Retirement Actual	10	100	2	2	100
Retirement Options	10	100	5	5	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	7	7	100

November 2022

November 2022					
Service	Days	Minimum Target	Cases	Within Target	Actual Performance
Death in Service	5	100	0	0	0
Death of a pensioner	5	100	0	0	0
Deferred Benefits	10	90	3	3	100
Divorce Cases	30	100	0	0	0
Estimates	10	100	1	1	100
General	10	100	20	19	95
Processing new entrants	10	90	0	0	0
Refunds	10	100	0	0	0
Retirement Actual	10	100	2	2	100
Retirement Options	10	100	5	5	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	9	9	100

December 2022


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

Task analysis

A verbal update will be provided on current task analysis, however levels are not expected to be of any cause for concern to the Board.

07 Complaints

Full Name	Description	Date received	Date completed	Comment
None this period				



Paul Mudd
Governance Manager
01642 030682

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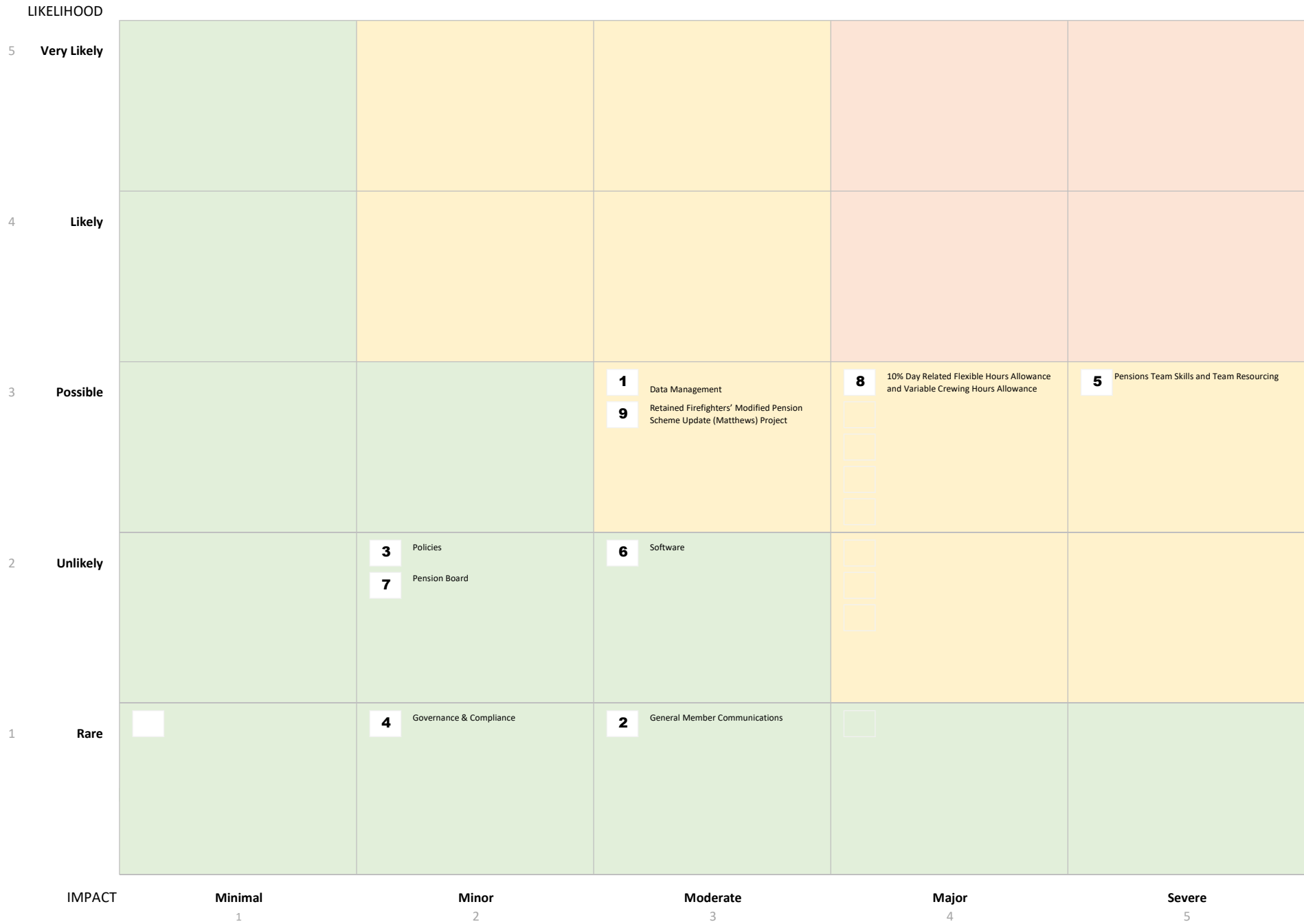
Registration

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Risk ID	Risk Title	Risk Owner	Risk with current mitigation controls in place		
			Likelihood (1-5)	Impact (1-5)	Overall Score
5	Pensions Team Skills and Team Resourcing	Scheme Manag	3	4	12
9	Retained Firefighters' Modified Pension Scheme Update (Matthews) Project	Scheme Manag	3	3	9
1	Data Management	Scheme Manag	2	3	6
6	Software	Bus Ops	2	1	2
7	Pension Board	LFPB Chair	2	2	4
3	Policies	LFPB Chair	1	2	2
2	General Member Communications	is Advisor / Pensic	1	2	2
4	Governance & Compliance	Scheme Manag	1	2	2
8	10% Day Related Flexible Hours Allowance and Variable Crewing Hours Allowance	Scheme Manag	3	3	9

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Risk ID	Risk Title	Risk Area	Risk sub-ID	Original Risk Number	Causes	Effect	Risk Owner	Likelihood (1-5)	Impact (1-5)	Overall Score	Key Existing Management Controls	Planned Enhancements to Controls (Actions)	Action by Whom	Target Review Date
1	Data Management		1A	F1	Incorrect data due to employer error, user error or historic error.	Service disruption such as incorrect annual benefits statements being processed. Data not secure or appropriately maintained.	Scheme Manager	2	3	6	TREAT/TOLERATE 1) Implementation and monitoring of a Data Improvement Plan by the pension administration team. 2) The Board will be made aware of the 2020 data scores. The service will work with Pensions Admin on improving the data in the system and make recommendations.		Senior Pensions Advisor / Pensions Project Officer & XPS	Jan-23
1	Data Management		1B	F28	Failure to hold personal data securely	Data is shared with unauthorised parties or can be targeted by cyber criminals	Scheme Manager				TREAT/TOLERATE 1) Information security was identified as a possible risk by XPS in their Assurance Report on Internal Controls (2022). Controls were detailed in the document, and the auditor did not feel further measures could be taken at present. 2) XPS submitted a Certificate of Assurance to SFRS in June 2022 to confirm they comply with the requirements of the cyber essential plus scheme. 3) All files shared between SFRS and XPS Administration are sent securely via the XPS file sharing portal. All files sent to SFRS from XPS are password protected. 4) Paperwork submitted to SFRS is scanned and saved onto the server. Hard copies are destroyed via the confidential shredding service. 5) SCC IT data security policy adhered to where applicable.		Scheme Manager	Jan-23
2	General Member Communications		2A	F4	Failure to communicate adequately and timely with scheme members		Senior Pensions Advisor / Pensions Project Officer	1	2	2	TREAT/TOLERATE 1) Develop a communications strategy for scheme members in relation to scheme changes and updates. 2) Update the pensions SharePoint Site. 3) Pension Administrators to send out ABS and PSS. 4) Communicate to members the new LGA pensions website. 5) Members self-service portal available from XPS. 6) Send regular communications and updates via SFRS News.		Senior Pensions Advisor / Pensions Project Officer	Jan-23
3	Policies		3A	F6	LFPB Policies and strategies not in place or reviewed.		LFPB Chair	1	2	2	TREAT/TOLERATE 1) Reviewed by the Board 2) Ensure roles and responsibilities are clarified. 3) An overriding pension policy has been created and is available on SharePoint.		Local Firefighter Pension Board	Jan-23

Risk ID	Risk Title	Risk Area	Risk sub-ID	Original Risk Number	Causes	Effect	Risk Owner	Likelihood (1-5)	Impact (1-5)	Overall Score	Key Existing Management Controls	Planned Enhancements to Controls (Actions)	Action by Whom	Target Review Date
4	Governance & Compliance		4A	F9	Failure to administer the scheme in line with regulations and policies, compliance towards regulations and assurances need to be built in to ensure the pension scheme is administered in line with current in force regulation and policy.		Scheme Manager	1	2	2	TREAT/TOLERATE 1) Update Pensions Team's knowledge through various sources such as SAB and the LGA. 2) Ensure team training is up to date. 3) Pensions Team to attend and regional fire administrator working groups. 4) Through strong governance arrangements and the active reporting of issues, seek to report all breaches as soon as they occur in order to allow mitigating actions to take place to limit the impact of any breaches.		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Jan-23
			4B	F11	Inability to respond to a significant event.	Prolonged service disruption and damage to reputation.	Scheme Manager				TREAT/TOLERATE 1) Disaster recover plan in place. 2) Ensure system security and data security is in place. 3) Business continuity plans regularly reviewed, communicated and tested. 4) Assess compliance with the Government's National Cyber Security Strategy 2016-2021.		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Jan-23
5	Pensions Team Skills and Team Resourcing		5A	F8	The lack of available skilled resources coupled with the absence of a coordinated training plan to address knowledge gaps.	Inefficiencies in Pension Admin	Scheme Manager	3	4	12	TREAT/TOLERATE 1) Administration was transferred to a third party in September 2021. 2) Migration to XPS who do have this knowledge will continue to process key cases using the 2 bank staff we have retained to work on fire. 3) Probable resourcing issues with McCloud and the Modified Scheme legislation both being implemented at the same time. Resource needs to be identified for both of these projects. A business case has been confirmed to recruit a new member to the team to assist with the admin in the team. 5) Training is also taking place with the Subject Matter Experts to improve the knowledge of pensions within the team.		Senior Pensions Advisor / Pensions Project Officer & XPS	Jan-23
			5C	F29	Expertise and knowledge lies with Bank staff.	If the Bank staff leave unexpectedly there will not be an opportunity to pass on their knowledge which may impact the exit process and value and efficiency of the service going forward	Scheme Manager				TREAT/TOLERATE 1) If Bank Staff leave the Service significant knowledge of the firefighters pensions will be lost, at present no process in place for the transfer of knowledge. 2) Initial discussions have taken place to transfer the knowledge to the newer team members. 3) The first session has taken place for the transfer of knowledge to take place particularly in relation to BAU tasks. Further topics will be discussed in the coming weeks. 4) It has been confirmed by the Scheme Manager that SAP access can be requested so remaining members of the pension team can access pay details if needed. This is now in place. 5) Bank staff to provide training before leaving. 6) The tasks completed by the Bank staff is listed so training can be directed as required.	Access to SAP pay data to be granted to Pensions Team staff	Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Jan-23

Risk ID	Risk Title	Risk Area	Risk sub-ID	Original Risk Number	Causes	Effect	Risk Owner	Likelihood (1-5)	Impact (1-5)	Overall Score	Key Existing Management Controls	Planned Enhancements to Controls (Actions)	Action by Whom	Target Review Date
6	Software		6A	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	1	2	TREAT/TOLERATE 1) Meeting took place with business ops on 22 February 2021. Outcome was agreement to look into an annual data submission in March 2022 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 for the new system 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. 4) Further discussions need to take place with XPS once Unit 4 is live to ensure data can be transferred seamlessly and whether year end reporting is still required. 5) This risk is to be updated once the Unit 4 'go-live' date has been confirmed.		Senior Pensions Advisor	Jan-23
7	Pension Board		7A	F10	Gaps in skills and knowledge of Board members	Board will be unable to adequately make decisions, provide assurance and to scrutinise the efficiency of the SFRS Pension Schemes.	LFPB Chair	2	2	4	TREAT/TOLERATE 1) Members of the Board will be mindful of the Attendance and Knowledge and Understanding Policy when setting objectives and establishing training needs. 2) The board has approval from Audit and Governance committee to establish substitutes. 3) All board members to attend annual training provided by the LGA. The last session took place on 29/03/22 4) Training log in place and all members have completed TPR toolkit for Board Members. 5) Training packs to be sent to new board member and support to be provided by the wider Board and pensions team to increase their knowledge. 6) A new employer member joined the Board in July 2022 and was provided with the relevant details of the TPR toolkit for Board Members.	1) LGA training due to take place in April 2023 for LFPB and pensions team members	Local Firefighter Pension Board	Jan-23

Risk ID	Risk Title	Risk Area	Risk sub-ID	Original Risk Number	Causes	Effect	Risk Owner	Likelihood (1-5)	Impact (1-5)	Overall Score	Key Existing Management Controls	Planned Enhancements to Controls (Actions)	Action by Whom	Target Review Date
8	10% Day Related Flexible Hours Allowance and Variable Crewing Hours Allowance		8A	F24	Failure to respond to legal advice for staff of the 10% pensionable pay allowances.	There is a risk the employer may not collect all contributions due.	Scheme Manager	3	3	9	TREAT/TOLERATE 1) Officers to report to the Board. 2) Legal advice has been received. Contact has been made with members. 3) Letters going to Fire Services to communicate with members who have transferred out. 4) Members that are currently in receipt of the 10% allowance are now making regular contributions. 5) Letters being finalised to go out to Members and will be sent out once the discussions with the FBU have been finalised. 6) the 10% project has recommended and it is hoped members from Priority group 2 onwards, will be contacted shortly.		Scheme Manager	Jan-23
			8B	F33	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.	Increase pressure on SFRS operating fund if the costs cannot be covered by the pension fund.	Scheme Manager				TREAT/TOLERATE 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) 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. 4) 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.		Senior Finance Business Partner / Senior Pensions Advisor / Pensions Project Officer	Jan-23
9	Retained Firefighters' Modified Pension Scheme Update (Matthews) Project		9A	F9I	Failure to notify staff of the Modified Pension Scheme	The employer and employee have to collect contributions and make contribution shortfalls.	Scheme Manager	3	3	9	TREAT/TOLERATE 1) Officers to report to the Board. 2) Legal advice has been received. Contact has been made with members. 3) Awaiting further communications regarding second options exercise. 4) Letters have gone out to members who returned an expression of interest form and to those that did not respond. Response deadline December 2021. 4) An update from the Home Office and LGA have confirmed it is likely the modified scheme will open via the second options exercise in October 2023. The affected members have been notified of this update.		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	
			9B	F25	Following the European Court of Justice's decision in O'Brien v Ministry of Justice which is a case concerning fee paid judges in the Judicial Pension Scheme, the UK Government have recognised the right for retained firefighters employed before 1 July 2000 to elect to become a special member from the start date of their employment.	A second options exercise will require additional resources which are limited.	Scheme Manager				TREAT: 1) A second options exercise is required, for which legal discussions have commenced between central government, the LGA on behalf of FRAs and trade union legal representatives to consider who is in scope and the details of the settlement exercise. 2)The most recent LGA Factsheet relating to this case stated that regulations for England will be drafted and consulted on following the conclusion of the legal discussions. It is expected further regulations and consultations for the devolved governments will follow later. No timescales are known at this stage. 3) It is likely that the options exercise will be undertaken post a decision on future pension administration services. The scope of the activity will be considered as more information becomes available. 4) The second options exercise is unlikely to be opened until October 2023. Communications to members to be sent out.		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	

Risk ID	Risk Title	Risk Area	Risk sub-ID	Original Risk Number	Causes	Effect	Risk Owner	Likelihood (1-5)	Impact (1-5)	Overall Score	Key Existing Management Controls	Planned Enhancements to Controls (Actions)	Action by Whom	Target Review Date
			9C	F32	<p>Communications have been sent to affected members to provide a further opportunity for those who did not respond to previous mailings to confirm if they want further information on the second option to join the modified scheme.</p> <p>However there have been no further updates from the Government as to when the scheme will reopen.</p>	The lack of updates from the Government and action the pensions can take, may cause members further and prolonged frustrations.	Scheme Manager				<p>TREAT/TOLERATE</p> <p>1) Open and transparent communications are to be sent regularly to keep affected members up to date.</p> <p>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.</p>		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	
			9D	F35	<p>It was expected in January 2022 onwards for updates to be provided by the government (Home Office & Her Majesty's Treasury) for updates around the McCloud and Matthews/O'Brien projects. Unfortunately there has been little movement throughout 2022 and the updates provided means further work cannot be completed. Furthermore we have received insights from the LGA that significant progress will not be possible until Q3 or Q4 of 2023.</p>	Member's frustrations may increase further as there is no work for SFRS to continue with until Q3 or Q4 of 2023.	Scheme Manager				<p>TREAT:</p> <p>1) The pensions project team continue to read the latest guidance and attend LGA coffee mornings where further information on these projects could be gained.</p> <p>2) The team are also sending communications at appropriate intervals to ensure members are kept up to date and key messages remain transparent.</p>		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	
			9E	F36	<p>It is known at this stage of the financial costs to implement the Modified Scheme.</p> <ul style="list-style-type: none"> - The standard assumptions have not yet been disclosed to the Fire Sector. - Employee contributions could date back as far as the 1960s. 	The Service is unable to plan accordingly. As the standard assumptions have not yet been defined, the Service cannot begin to predict the costs	Scheme Manager				<p>TREAT:</p> <p>1) The Service will be able to undertake preliminary work such as identifying those in scope, data cleansing, identifying access to legacy systems etc. Some of this work has started.</p> <p>2) Calculations cannot be carried out until legislation has been implemented in September 2023.</p>		Scheme Manager / Senior Pensions Advisor	

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FPS Bulletin 62 – October 2022

Welcome to issue 62 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	8 November 2022 and 22 November 2022
Midlands regional group	2 November 2022
South-West and Wales regional group	3 November 2022
South-East regional group	8 November 2022
North-East regional group	23 November 2022
Eastern regional group	5 December 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:

[IQMP – Central list](#): For FRAs to inform the LGA of the IQMPs they use and to provide contact details.

FPS

Matthews – FPS member website update

Colleagues who attended the coffee morning on Tuesday 11 October will be aware that we have recently added some additional commentary to the [FPS member website](#) around the [special members second options exercise](#).

Prior to updating the website, we asked stakeholders for their views on what message should be communicated under the 'Do I need to do anything now?' section. An overwhelming majority confirmed that it would be useful to ask individuals, who believe they are in scope for the second exercise, to present themselves to the FRA. To assist with this process, the LGA has provided a [generic proforma](#) for members to complete and set out clear instructions that this should be returned to the FRA.

Unfortunately, we have been made aware that some members are not following this instruction and have instead been forwarding their forms to the administrator. We have therefore added some additional text which states the following:

Please make sure that the form is returned to your FRA or former FRA and not your pension scheme administrator. Forms sent to your pension scheme administrator will not be actioned and your FRA may not then have your details to contact you when the options exercise starts.

Matthews – Member warm up communications

It was agreed at the [coffee morning of the 12 July 2022](#) that generic warm-up letters would be useful for FRAs when communicating with members in relation to the second options exercise. This action was taken forward and discussed at the Fire Communications Working Group (FCWG) [meeting of 16 September 2022](#).

We are pleased to confirm that the content of the letters has been agreed and that the templates for both [in scope](#) and [out of scope](#) retained firefighters have been uploaded to the [Special Members section of the FPS regulations and guidance website](#). FRAs are strongly recommended to use these templates where appropriate.

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IQMP – Central list

Following feedback from the sector on the difficulties of identifying an Independent Qualified Medical Practitioner (IQMP) for ill health referrals and reassessments the LGA is proposing to hold a central list of IQMPs that FRAs would be able to approach.

We would therefore appreciate it if FRAs would share with us the contact details of the IQMPs that they currently use, we would then approach the IQMP and ask them for their permission to publicise their contact information on the protected area of the FPS regulations and guidance website.

ACTION: For FRAs to inform the LGA of the IQMPs they use and to provide contact details.

Fire and Rescue workforce and pension statistics published

On 20 October 2022, the Home Office [published workforce and pensions statistics for Fire and Rescue Services \(England\)](#). The pension scheme statistics, covering April 2021 to March 2022, reflect data returns on income, expenditure and membership submitted by all 44 FRAs in England.

During the financial year 2021 to 2022 some of the key results were:

- **the Firefighters’ Pension Scheme total expenditure was around £954 million**, a six per cent increase compared with the previous year (£903 million in financial year 2020 to 2021) and 17 per cent higher than five years previously (£818 million in financial year 2016 to 2017)
- **81 per cent of expenditure was ‘recurring outgoing payments’**, 18 per cent was ‘commutation payments’, while ‘transfers’ and ‘miscellaneous expenditure’ together totalled one per cent
- **the Firefighters’ Pension Scheme total income was around £399 million**, a one per cent increase compared with the previous year (£393 million in financial year 2020 to 2021) and a 41 per cent increase from five years previously (£283 million in financial year 2016 to 2017)

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- **employer contributions rose one per cent to £266 million**, from £264 million in financial year 2020 to 2021, and nearly double the value of £134.9 million in financial year 2018 to 2019 as a result of changes to the discount rate set by HM Treasury from April 2019
- **67 per cent of income was ‘employer contributions’**, 30 per cent was ‘employee contributions’ and the remaining three per cent comprised a combination of transfers, miscellaneous income and ill-health charges
- **the Firefighters’ Pension Scheme deficit was around £556 million**, a nine per cent increase compared with the previous year (£510 million in financial year 2020 to 2021) and a four per cent increase compared with five years previously (£535 million in financial year 2016 to 2017)

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 regarding the compensation scheme, page 45 and retirement, page 108 have been added.

FPS England SAB updates

SAB remedy engagement sessions

As 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.

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The most recent sessions considered early/late retirement and abatement. Material from some sessions has been added to a new page called '[age discrimination remedy – Provision Definition Documents](#)' in the member restricted area of the FPS Regulations and Guidance area for the benefit of practitioners.

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

[SAB letter to scheme managers on pension dashboards](#)

In [FPS Bulletin 59 - July 2022](#) we reported on the Department for Work and Pensions (DWP) response to the consultation on the draft Pensions Dashboards Regulations and highlighted that the staging deadline for all public service schemes will be 30 September 2024 and that the requirement to provide value data will be 1 April 2025. As a result of these new legislative requirements, the Chair of the SAB has issued a [letter to scheme managers and Local Pension Boards](#) reminding them of their duties in respect of the new [Pensions Dashboards](#), as scheme managers are ultimately responsible under the regulations for ensuring that dashboard duties are met.

These duties include:

- Working towards the 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. Scheme managers will need to understand how their provider will be able to pick out those requests which correspond to their 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: Administrator should be able to tell scheme managers how they are planning to connect whether through the existing software providers or through some other route.

- Reviewing scheme data: The SAB understands 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).
- Co-operating with the Money and Pensions Service (MaPS). More information on this can be found from [Pensions dashboards: initial guidance](#)

Other News and Updates

Public sector unions granted judicial review over McCloud cost remedy

In [FPS bulletin 59 – July 2022](#) we confirmed that public sector unions had been granted a judicial review in relation to the McCloud/ Sargeant remedy costs in the cost control mechanism. We can now confirm that a date has been agreed for the hearing, it will commence on 23 January 2023 and has been allocated five days.

A day in the life of The Pensions Ombudsman (TPO)

The Pensions Ombudsman (TPO) published [an article setting out a day in the life of Anthony Arter](#) on 13 October 2022. Anthony is the current Pensions Ombudsman.

The article was published to mark the fifth annual Ombuds Day. The Ombuds Day aims to educate and raise awareness among the public about the history and practices of the ombuds profession. This year's theme was resilience, respect, and resolve.

Dominic Harris will replace Anthony Arter as Pensions Ombudsman next January.

The Pensions Regulator (TPR) enforcement and prosecution policies updated

On 25 October 2022, The Pensions Regulator (TPR) published the following:

- [revised enforcement policy](#)
- [updated prosecution policy](#)
- [new enforcement strategy](#)

These aim to give clarity on what those who are subject to enforcement action can expect from TPR.

The enforcement policy sets out TPR's approach to investigating cases and any subsequent enforcement action. The policy is now web-based and divided into standalone chapters, each with links to other relevant documents. The policy also consolidates the policies in respect of defined benefit schemes, defined contribution schemes and public service pension schemes.

The prosecution policy explains how TPR will approach prosecuting workplace pension criminal offences. The policy has been brought up to date to reflect the new criminal powers in the Pensions Schemes Act 2021 and other developments.

The enforcement strategy sets out the overarching aims of TPR's enforcement work (excluding automatic enrolment) and provides an insight into the framework TPR applies when selecting cases for enforcement action.

TPR ran a consultation on the revised enforcement and prosecution policies between 4 May 2022 and 24 June 2022 and responded on 25 October 2022. You can access the consultation documents on [the consultations page of TPR's website](#).

For more information, see the [press release from TPR](#). Erica Carroll, TPR's Director of Enforcement, has also published [a blog setting out the reasons for the changes](#).

The Pensions Regulator (TPR) speech at PLSA conference

Charles Counsell, Chief Executive Officer at The Pensions Regulator (TPR), delivered a speech at the recent Pensions and Lifetime Savings Association (PLSA) conference. The speech was titled “Looking Ahead: Regulating for the Saver”.

The speech covered a wide range of issues, including dashboards, liability-driven investments, and the cost-of-living crisis.

TPR has published [an extract of the speech](#).

Pension Dashboards - Draft guidance on deferring staging date published

On 17 October 2022, the Department for Work and Pensions (DWP) published [draft guidance on applying to defer the staging deadline](#). The DWP has also published a [template application form](#).

The draft Pensions Dashboards Regulations 2022 propose allowing trustees / managers of a pension scheme to apply to the DWP to defer their staging deadline. The regulations set out the time limits in which to apply and the circumstances where the DWP may accept applications. The DWP may only agree to defer the staging deadline once for each scheme and for a period of up to 12 months.

The DWP has produced the draft guidance to aid understanding of the application process. This includes:

- what the DWP will consider when reviewing applications
- what evidence should be submitted to support an application
- how to apply, including a recommendation to use the template application form
- how the DWP will let schemes know whether they have accepted the application and how schemes can appeal.

The DWP will finalise the draft guidance once the dashboard regulations come into force.

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Pension Dashboards - Progress update report

On 26 October 2022, the Pensions Dashboards Programme (PDP) published its [sixth progress update report](#).

The report covers:

- activity in the six-month period from April 2022,
- focus areas to April 2023
- updates from partners, such as the Department for Work and Pensions and the Pensions Regulator.

To complement the report, the PDP will be hosting a webinar on 3 November 2022. You can sign up for the webinar on [the registration page of the PDP's website](#).

Pension Dashboards - Videos published

On 13 October 2022, the Pensions Dashboard Programme (PDP) published two short videos.

The first video is called '[Get your data ready for pensions dashboards](#)'. The video aims to give helpful guidance to schemes on how to cleanse data so that it is accurate and up to date.

The second video is called '[An introduction to find and view data](#)'. The video explains the important differences between find data and view data.

Department for Work and Pensions (DWP) respond to further consultation on dashboards

On 17 October 2022, Department for Work and Pensions (DWP) responded to the further consultation on dashboards. This ran from 28 June to 19 July 2022, see [FPS Bulletin 58 – June 2022](#) for more information.

The response confirms that the DWP will:

- give pension schemes six months' notice of the point at which pensions dashboards will be available to the public, the 'Dashboard Available Point'. This is an increase to the 90 days proposed in the consultation
- go ahead with the second proposal allowing the Money and Pensions Service (MaPS) and the Pensions Regulator (TPR) to share information about dashboards.

Research on public value of dashboards published

The Pensions Dashboards Programme (PDP) has published the results of research carried out by Ipsos. The PDP commissioned Ipsos to carry out quantitative research into the value that people attach to pension dashboards and their likelihood to use them.

The PDP will use the results to inform development of the central digital architecture.

For more information, including a link to the results, see [the press release from the PDP](#).

Update on connecting early participants to the dashboard ecosystem

On 17 October 2022, the Pensions Dashboards Programme (PDP) published [an update on the programme](#).

The information outlines the next three steps, leading to the early participants connecting to the dashboard ecosystem. The early participants are those who volunteered to help test and develop the ecosystem.

Financial Conduct Authority (FCA) warn that cost-of-living crisis could increase pension scams

The Financial Conduct Authority (FCA) has recently issued a [press release warning that the cost-of-living crisis could cause an increase in pension scams](#).

The warning follows FCA research that a quarter of consumers would consider withdrawing money from their pension earlier than planned to cover the cost of living, making them vulnerable to pension scammers.

September 2022 CPI rate announced

On 19 October 2022, the Office for National Statistics announced [the Consumer Prices Index \(CPI\) rate of inflation for September 2022 as 10.1%](#).

Government policy in recent years has been to base increases under the Pensions (Increase) Act 1971 and revaluation of pension accounts under section 9 of the Public Service Pensions Act 2013 on the rate of CPI in September of the previous year.

We await confirmation from Government that the revaluation and pensions increase that will apply to FPS deferred pensions and pensions in payment in April 2023 will be 10.1 per cent.

HMRC

Pension Schemes newsletter 143

HMRC published [Newsletter 143](#) on 30 September 2022.

The newsletter includes articles:

- confirming that schemes can again use the pension scheme tax reference number when paying charges if they do not have a specific charge reference. HMRC had previously announced in April 2022 that schemes were unable to do so

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- confirming that Government has decided against introducing a new reportable event for certain public service pension schemes from April 2023
- confirming that HMRC expects to release the event report for 2023/24 on the Managing pension schemes service in summer 2023. HMRC had previously been expected to release this in spring 2023.

Message from HMRC on the 2021/22 event reporting mechanism

As last year, HMRC is prepared to accept from PCM customers, scheme data regarding pension savings statements for 2021-22 on an excel spreadsheet rather than through the scheme's Event Report. All other scheme events for 2021-22, with the exception of the lifetime allowance protection regimes (see below), must be submitted via Pensions Online.

This concession is on the clear understanding that the pension savings statement data represents part of the scheme's formal reporting obligations for the 2021-22 Event Report. The data must be submitted by 31 January 2023 and HMRC reserves the right to open enquiries based on any of the pension savings statement information provided.

The data required for each member is as follows:

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

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

Guidance is included at www.gov.uk/hmrc-internal-manuals/pensions-tax-manual/ptm161600 and www.gov.uk/hmrc-internal-manuals/pensions-tax-manual/ptm167000.

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

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

Lifetime Allowance

You may recall from last year that, in accordance with article 6.2 of the [Pension schemes newsletter 85 - March 2017 - GOV.UK](#), the Event Report was not amended to include lifetime allowance protections that members applied for online. If you need to submit these details to HMRC, you can also submit them on a password protected spreadsheet and send the password in a separate email. You should put 'Lifetime allowance – Event Reporting' in the subject line of your email and send this to pensions.businessdelivery@hmrc.gov.uk and, again, copy in your PCM. This data must also be provided by 31 January 2023.

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

Events

FPS coffee mornings

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

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The next session is due to take place on 8 November, due to diary commitments it will be held in the afternoon from 14:00 to 15:00.

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

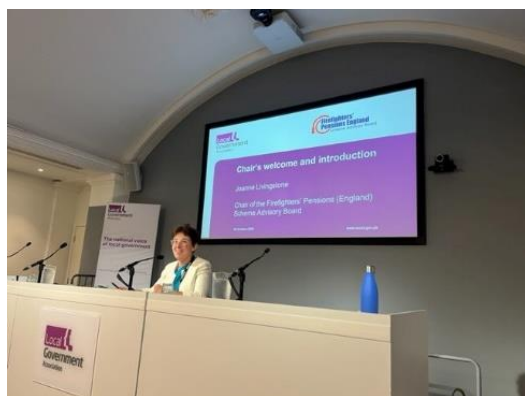
[11 October 2022 – General update on Matthews and 2015 remedy project management](#)

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

FPS AGM - Event summary

The 25 and 26 October saw the long-awaited return of the annual fire pensions conference. In keeping with tradition, the two-day event opened with a meeting of the regional chairs of each fire pensions officer group, followed by the technical community.

We were delighted to welcome over 50 delegates to the first full conference session, aimed at scheme managers and Local Pension Boards, along with other parties with an interest in FPS governance. Following the Chair's welcome, the audience heard from Colin Dobbie, Consultant Actuary at Isio, on how pension boards can support both scheme managers and members with the 2015 remedy.



Alison Murray, Partner from AON then took to the stage to inform the room on how they can prevent their FRAs falling foul of cyber risk and security.

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Our final speaker was Nick Gannon, policy lead at The Pensions Regulator (TPR). Nick gave an informative presentation on the forthcoming single code of practice.

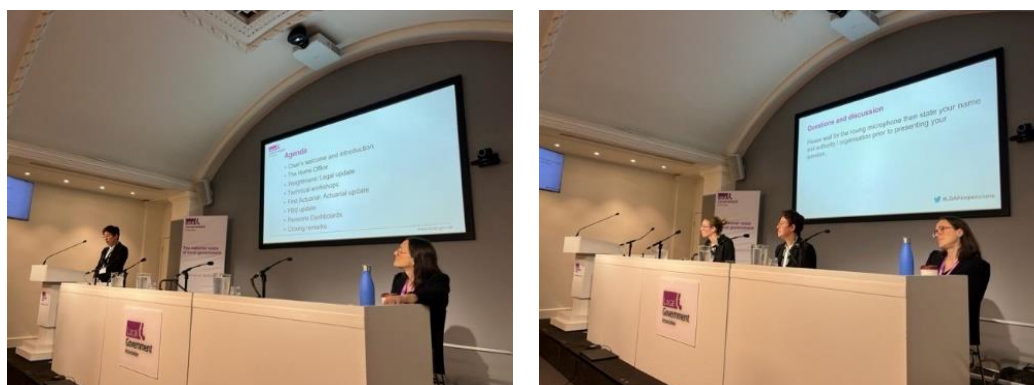


We ended the day with a networking drinks reception with lots of animated conversation between colleagues and friends.

Day one presentation slides are available [here](#).

The full technical/ administration AGM took place on day 2 with an attendance of around 80 delegates in our Bevin Hall conference room.

Joanne Livingstone, chair of the FPS (England) SAB, once again opened proceedings, outlining some of the challenges we have experienced over the last 12 months. We were then delighted to welcome Frances Clark, Deputy Head, Police Workforce & Professionalism Unit - Reward and Recognition, to provide a view from central government including progress updates on both the Matthews and age discrimination remedy.



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We then welcomed to the stage Jane Marshall, Partner from Weightmans LLP, provided the ever-popular case law update, taking the audience on a whistle stop tour of recent Pensions Ombudsman decisions.



Following a short break, attendees were given the opportunity to join one of two technical workshops: Clair Alcock, Head of Police Pension at the NPCC, hosted the workshop on discretions which generated some interesting discussion as well as sharing of best practice. In Bevin Hall Jane Marshall facilitated the workshop on the Compensation Scheme covering areas under the regulations such as eligibility, qualifying injuries, injury awards and causation, which again created a productive workshop discussion.

Lunch followed and delegates once again had chance to network with colleagues as well as visiting exhibition stands hosted by the following organisations: Isio, Pen-gage and Perspective.

In the tough first afternoon slot, James Allen, an Actuary from First Actuarial LLP, provided the audience with an update on the 2020 valuation process. Mark Rowe, National Officer from the FBU, then took to the stage to give an informative member perspective view on the challenges and frustrations they currently face.



The final session of the day focused on Pensions Dashboards. The joint session was hosted by Richard James, Programme Director from the Pensions Dashboard Programme and Lucy Stone, Business Lead on Pension Dashboards from TPR.



Joanne Livingstone closed the conference for 2022 with a message of support for the challenges that the FPS community face over the next 12 months.

We would like to thank all for their participation and support, particularly our speakers and exhibitors for contributing to the success of the event, and to all delegates who took time out of their busy schedules to attend. We look forward to seeing you again next year.

Day two presentation slides are available [here](#).

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Legislation

Statutory Instruments

SI	Reference title
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2022/1044	The Pension Schemes Act 2021 (Commencement No.7 and Transitory Provision) Regulations 2022
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Draft dashboard regulations laid for approval

On 17 October 2022, the Department for Work and Pensions (DWP) laid a draft of [The Pensions Dashboard Regulations 2022](#) before each House of Parliament.

DWP can only make the regulations if each House approves the draft by a resolution. The House of Lords will consider the regulations on 15 November 2022. As yet, no date has been set for this to happen in the House of Commons.

DWP consulted on draft dashboard regulations between 31 January 2022 and 13 March 2022. DWP responded on 15 July 2022, which we covered in [FPS Bulletin 59 – July 2022](#). The draft regulations laid before each House have been amended to reflect the consultation response. The regulations have also been amended to reflect the response to the further consultation on the Dashboards Available Point.

Useful links

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

Contact details

Claire Hey (Senior Pensions Adviser)

Telephone: 07825 731 924

Email: claire.hey@local.gov.uk

Claire Johnson (Firefighters' Pensions Adviser – Employers)

Telephone: 07920 861 552

Email: claire.johnson@local.gov.uk

Elena Johnson (Firefighters' Pensions Adviser – Governance)

Telephone: 07770 763 031

Email: elena.johnson@local.gov.uk

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FPS Bulletin 63 – November 2022

Welcome to issue 63 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 13 December 2022
Eastern regional group	5 December 2022
SAB	8 December 2022
FPS Communications Working Group	12 December 2022
North West regional group	14 December 2022

Actions arising

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

[Age discrimination remedy – Ill-health factsheet on re-assessment of cases](#): FRAs to review the ill health re-assessment factsheet and ensure that appropriate action is taken where necessary.

[SAB levy 2022-23 – Request for Purchase Order numbers](#): FRAs to provide a valid purchase order number, stating the number of employees eligible to join one of the Firefighters' Pension Schemes as of 1 April 2022, using the form provided with the SAB 2022-23 levy letter.

[Consultation on The Public Services Pension Scheme \(rectification of unlawful discrimination\) \(Tax\) regulations 2023](#): FRAs and administrators are encouraged to respond to the consultation.

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FPS

Age discrimination remedy – Ill-health factsheet on reassessment of cases

The [coffee afternoon held on 8 November 2022](#) had a focus on what retrospective action is required for ill-health cases under the age discrimination remedy.

As a reminder, a re-assessment of ill-health entitlement will not be needed in every case. It is only where, under rollback, the individual would qualify for alternative ill-health benefits and the assessment criteria under the regulations sets a lower qualifying bar.

To help FRAs determine which individuals require a reassessment we have put together a [factsheet to ill-health re-assessments](#) which sets out the final policy in more detail.

Additionally, the factsheet encourages scheme managers to take immediate steps to review the cohort of membership which will require a re-assessment. This is to ensure that, come 1 October 2023, these cases can be dealt with as soon as possible. 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 ill-health re-assessment factsheet and ensure that appropriate action is taken where necessary.

Pension Scheme Transitional Protections: Injury to Feelings employment tribunal hearing 14-28 October – hearing vacated

As notified to FRAs by email on 11 November 2022 and previously to Nominated Contacts on 14 October 2022, we can confirm that that the injury to feelings Employment Tribunal which was scheduled to be heard from 14 – 28 October has been vacated.

The injury to feelings claims were made as part of the Sargeant (age discrimination) litigation and are claims for compensation for non-financial loss.

Vacation of the hearing followed agreement in principle as to issues of non-financial loss, and to provide further time to negotiate the full settlement details between all parties (including FRAs) through their respective legal representatives. In the case of FRAs, approval will then be needed by the Steering Committee before final agreement is reached.

The cost of compensation will be fully met by the Government.

In respect of the claimants this applies to, it is all the named original 2015 claims in England and Wales brought by the FBU (but not claims in Scotland or Northern Ireland). This does not settle the further claims served last year, the FOA (Slater and Gordon) claims nor any of the reverse discrimination claims.

You may receive queries from employees. Unfortunately, we are not able to provide advice and employees will need to seek their own advice. We will continue to keep FRAs updated on any material developments through their nominated contact.

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 regarding the following have been added:

- Widow's benefits upon re-marriage - page 119
- Aggregation for FPS 2006 Special Members – page 19
- AA for Immediate Detriment – page 16
- Ill-health calculation for transitional member – page 90

FPS England SAB updates

SAB levy 2022-23 – Request for Purchase Order numbers

We are pleased to confirm that the Scheme Advisory Board (SAB) budget for 2022-23 has been approved by the minister and the invoicing process has started.

In 2014, FRAs entered a shared arrangement to fund a technical adviser post to support FRAs with their understanding and management of the Firefighters' Pension Schemes. The employers' voluntary subscription is included in the final levy.

The total levy for the 2022-23 year will be £6.27 per firefighter, which is calculated at £4.39 for the SAB and £1.88 for employers. A letter was sent by email to Chief Fire Officers and HR Directors on 21 November 2022 advising them of this.

Devolved FRAs have also been sent levy requests with regard to the employer advice service provided to them by the LGA.

The first stage of the process is for FRAs to provide a valid purchase order number, stating the number of employees eligible to join one of the Firefighters' Pension Schemes as of 1 April 2022, using the form provided with the letter.

ACTION: FRAs to provide a valid purchase order number, stating the number of employees eligible to join one of the Firefighters' Pension Schemes as of 1 April 2022, using the form provided with the SAB 2022-23 levy letter.

SAB remedy engagement sessions

As 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.

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The most recent sessions considered contingent decisions, divorce and CETVs. Material from some sessions has been added to a new page called '[age discrimination remedy – Provision Definition Documents](#)' in the member restricted area of the FPS Regulations and Guidance area for the benefit of practitioners.

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

PDP publishes updated standards

On 16 November 2022, the [Pension Dashboard Programme \(PDP\) published its revised standards](#) for connecting to the dashboards ecosystem. They cover the technical and operational detail that underpins dashboards legislation. The revised standards incorporate feedback from the consultation published in July 2022 – see [FPS bulletin 59 – July 2022](#) for more information.

Although the revised standards are pending final approval by the Secretary of State for Work and Pensions, they have been published to give schemes advance notice of the duties that they will need to comply with.

PDP also confirmed the process for updating the standards going forward, including the principles for decision-making and the notice period for industry.

A consultation on the draft design standards for qualifying pensions dashboards will take place in the winter.

PDP Webinars

PDP will host the following webinars in December 2022:

- 5 December 2022 - Dashboards standards: data, reporting and technical standards
- 7 December 2022 – Dashboards standards: code of connection, early connection and governance

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- 8 December 2022 – Dashboards standards: design standards consultation

Visit [PDP's events and meetings webpage](#) to sign up for their webinars.

TPO – Factsheets

The Pensions Ombudsman (TPO) published two new factsheets in November:

- [Determination by the Ombudsman factsheet](#) explains what happens after TPO has issued a determination including complying with the direction and how to appeal on a point of law
- [Privacy and Personal Information Policy](#) explains why and when TPO collects personal information about third parties.

You can find and search [all TPO publications](#) on their website.

TPR consultation on dashboard enforcement

On 24 November 2022, the Pensions Regulator (TPR) launched a consultation on its dashboards compliance and enforcement policy.

The draft policy sets out TPR's expectations for scheme managers to achieve compliance with the Pensions Dashboards Regulations 2022 – 'the Regulations' and provides clarity on its approach to enforcement. Governing bodies of occupational pension schemes and third parties such as employers, administrators, and Integrated Service Providers (ISPs) are in the scope of the draft policy. TPR has the power to pursue these parties if it believes there has been a breach of the Regulations.

In monitoring compliance, TPR will focus on behaviours or breaches they consider pose the greatest risk to savers. Areas of particular interest are:

- connection: connecting by the scheme's statutory deadline, connecting all active, deferred and pension credit members, and remaining connected in line with relevant standards

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- matching and returning accurate data: connecting the right member with the right data, failure to find a saver (i.e. failing to return a match made or a possible match) and failure to provide data in line with legal requirements.

TPR expects schemes to:

- operate adequate internal controls including risk management processes and processes to identify breaches of the law
- keep clear audit trails of steps to achieve compliance and resolve issues
- record their matching policy and data improvement process

TPR will monitor compliance using multiple sources of evidence. It may request additional evidence from schemes when it has concerns or to identify best practice.

Any enforcement action will be balanced against the outcome it may achieve.

Breaches of the law that are persistent, intentional or indicate dishonesty are likely to be of higher priority.

TPR may issue compliance notices to trustees, scheme managers or third parties when a breach occurs. The purpose of a compliance notice is to stop non-compliance and avoid a repeat of the breach.

It may issue penalty notices to those parties in response to a breach or when they fail to comply with a compliance notice. Each penalty can be up to £5,000 for an individual and up to £50,000 in other cases. TPR will work with partner agencies and regulators and, where appropriate and permitted by law, share information with them.

You can find a [link to the consultation on the TPR website](#). The consultation closes on 24 February 2023.

Regulators issue scam warning to pension schemes and savers

TPR joined forces with the Financial Conduct Authority and the Money and Pensions Service to issue a [scam warning to pension schemes and savers](#) on 11 November 2022. The statement warns of an increased risk from scammers because of the current economic uncertainty.

The warning urges savers to:

- contact [MoneyHelper](#) for free, impartial advice before making any hasty decisions
- check that they are dealing with a legitimate firm by visiting the [ScamSmart website](#)
- know [how to spot pension scams](#) and avoid them.

TPR blogs

TPR published two blogs in November 2022:

- [TPR blog on automatic enrolment](#) considers the successes of ten years of automatic enrolment, urges employers to ensure they comply with their re-enrolment duties and look forward to improved member engagement
- [TPR blog on equality diversity and inclusion](#) outlines TPR's strategy to move towards a fairer and more inclusive culture within their organisation and across the pensions industry.

GAD blog on Public Service Pension Schemes

The Government Actuary's Department (GAD) has published a blog about the pressures faced by administrators of public service pension schemes. [GAD's blog 'Looking ahead in public service pension administration'](#) considers:

- the challenges of translating the McCloud remedy into administration processes
- the importance of data quality for pensions dashboards

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- the complexity of administration provider or administration system procurement

Autumn Statement 2022

The Chancellor of the Exchequer delivered his Autumn Statement to Parliament on 17 November 2022. The statement confirmed the following policies that have a direct or indirect impact on pension scheme members:

- The State Pension triple lock was maintained and working age benefits will increase in line with inflation in April 2023. Next year's State Pension increase will be 10.1 per cent.
- [The DWP review of the State Pension age](#) will be published early in 2023. The review is currently underway to consider whether the existing timetable to increase the State Pension age remains appropriate. The Government must publish the review by 7 May 2023.
- No changes to the annual allowance, tapered annual allowance or Money Purchase Annual Allowance in 2023/24.
- No changes to the Lifetime Allowance which will remain at its current level of £1,073,100 until the end of the 2025/26 year.
- Current personal tax thresholds for income tax and national insurance (in England and Wales) will be frozen until April 2028.
- The additional rate threshold (in England and Wales) will reduce from £150,000 to £125,140 from April 2023. This is the threshold beyond which individuals pay income tax at 45 percent.

You can find the [Autumn Statement 2022 documents](#) on the Government's website. The lifetime allowance and annual allowance figures are confirmed in the [Autumn Statement 2022: Policy Costings](#).

New ministerial appointments

[Laura Trott MP](#) was appointed Parliamentary Under Secretary of State at the Department for Work and Pensions (DWP) in October, and she was confirmed as the new minister for pensions on 7 November 2022.

Guy Opperman MP, who served as the Minister for Pensions until 8 September 2022, returned to the DWP as Minister of State on 27 October 2022.

[The Rt Hon Chris Philp MP](#) was appointed as the Minister for Crime, Policing and Fire on 26 October 2022.

HMRC

HMRC publishes newsletter 144

On 3 November 2022, HMRC published [Pension schemes newsletter 144](#). The newsletter includes articles about:

- Requesting a refund through the Managing Pension Schemes Service. You can find out more information on how to [Request a pension scheme refund or reallocation](#) online.
- Migrating from the Pension Schemes Online service to the Managing Pension Schemes service.
- The Accounting for Tax (AFT) return for 1 July to 30 September 2022 must be submitted by 14 November 2022 to avoid interest and penalties.
- AFT returns for any quarter from 1 April 2020 onwards can only be submitted on the Managing Pension Schemes service.

The [Managing Pension Schemes user panel](#) that gives feedback on the service and helps to inform future developments.

Public service pensions remedy newsletter

On 25 November 2022, HMRC published [Public service pensions remedy newsletter](#). The newsletter summarises the draft regulations and guidance that they are currently consulting on and confirms that HMRC is not able to respond to member queries related to the remedy.

Consultation on the Public Services Pension Scheme (rectification of unlawful discrimination) (Tax) regulations 2023

On 25 November 2022, HMRC published a [technical consultation on a draft statutory instrument](#), which ensures the pensions tax framework will apply as intended to pension scheme administrators and members affected by the public service pensions remedy.

The consultation seeks views from pension scheme administrators on the draft regulations. The regulations set out changes to how the pensions tax rules will apply to pension scheme administrators and members of public service pension schemes as a result of the public service pensions remedy.

The regulations will make changes to how pensions tax legislation operates in certain circumstances, including changes to how schemes will need to report and pay extra tax charges or reclaim overpaid tax and ensure that schemes can pay pension benefits as authorised payments.

This legislation is intended to take effect from 6 April 2023, but some provisions will have a retrospective effect.

The consultation documents include an explanatory memorandum and guidance for administrators on the draft regulations.

We will respond to the consultation and share our response before the consultation closes on 6 January 2023.

ACTION: FRAs and administrators are encouraged to respond to the consultation.

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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 Tuesday 6 December at 10:00.

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

[8 November 2022 – Retrospective ill-health reassessment](#)

[22 November 2022 – Discretions workshop](#)

[29 November 2022 – Compensation scheme workshop](#)

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

Legislation

Statutory Instruments

SI	Reference title
2022/1220	<u>The Pensions Dashboards Regulations 2022</u>
2022/1229	<u>The Occupational Pensions (Revaluation) Order 2022</u>
2022/1230	<u>The Police, Fire and Crime Commissioner for Cumbria (Fire and Rescue Authority) Order 2022</u>

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Useful links

- [The Firefighters' Pensions \(England\) Scheme Advisory Board](#)
- [FPS Regulations and Guidance](#)
- [FPS Member](#)
- [Khub Firefighters Pensions Discussion Forum](#)
- [FPS1992 guidance and commentary](#)
- [The Pensions Regulator Public Service Schemes](#)
- [The Pensions Ombudsman](#)
- [HMRC Pensions Tax Manual](#)
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Contact details

Claire Hey (Senior Pensions Adviser)

Telephone: 07825 731 924

Email: claire.hey@local.gov.uk

Claire Johnson (Firefighters' Pensions Adviser – Employers)

Telephone: 07920 861 552

Email: claire.johnson@local.gov.uk

Elena Johnson (Firefighters' Pensions Adviser – Governance)

Telephone: 07770 763 031

Email: elena.johnson@local.gov.uk

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FPS Bulletin 64 – December 2022

Welcome to issue 64 of the Firefighters' Pensions Schemes bulletin.

We would firstly like to offer our thanks to all our colleagues for their help and support during the year.

As always, in finest December bulletin tradition, Eunice Heaney has kindly provided a topical illustration for our readers below.

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



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

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

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Table 1: Calendar of events

Event	Date
FPS coffee morning	5 and 19 January 2023
SAB	23 January 2023
FPS Communications Working Group	14 March 2023

Actions arising

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

[Deferred connection guidance published](#): FRAs who meet the limited circumstances and want to apply to defer dashboard connection, must email pensionsdashboard@DWP.gov.uk as soon as possible and before 12 December 2023.

[Early connection guidance updated](#): FRAs should decide as soon as possible if they want to connect early to dashboards and apply to MaPS when application forms are available.

[HMRC publishes pension schemes newsletter 145](#): FRAs and administrators to remind members who do not have enough carry forward to offset a tax charge for 2021 to 2022 to declare this on their self-assessment tax return.

FPS

IQMP central list

In [FPS Bulletin 62 - October 2022](#), we advised that following feedback from the sector on the difficulties of identifying an Independent Qualified Medical Practitioner (IQMP) for ill health referrals and reassessments, the LGA was proposing to hold a central list of IQMPs that FRAs would be able to approach.

We are pleased to confirm that we have received a number of replies from FRAs who have shared with us the contact details of the IQMPs that they currently use. As a result, several IQMPs have given their permission for the LGA to publicise their contact information on the protected area of the FPS Regulations and Guidance website. This information can be located under IQMP/IQMP provider contact information on the [ill-health and injury page](#).

New address for Health Partners (Board of Medical Referees)

From 1 January 2023, Duradiamond/ Health Partners' address will be:

Health Partners Group Ltd

The Roller Mill

Mill Lane

Uckfield

East Sussex

TN22 5AA

They will have a postal redirection notice in place for three months.

[New webpage created – Retrospective remedy](#)

We are pleased to advise that a [new webpage for retrospective remedy](#) has been created on the FPS Regulations and Guidance website. This page contains useful information and documents about the retrospective remedy which comes into force on 1 October 2023.

Current documents available include the age discrimination remedy eligibility factsheet, the originally out of scope-now in scope member letter, the originally out of scope-still out of scope member letter, and the age discrimination remedy ill health re-assessment factsheet.

[Consolidated Regulation 65](#)

As advised in [FPS Bulletin 57 - May 2022](#), changes have been made to the reformed scheme rules. [Regulations 65\(2A\) and \(2B\)](#) have been inserted into the FPS 2015 regulations with effect from 1 April 2022 to ensure that a protected member who applied for IHR before 31 March 2022, where the application is determined in their favour after that date, is treated no less favourably than if the application had been determined on that date.

This means that for members where the ill-health assessment process began on or before 31 March 2022, the member is assessed for ill-health retirement against an NPA of 55. This will mean that there should be no cases where an affected member would have qualified for ill-health retirement under the legacy 1992 scheme but does not qualify under the reformed scheme.

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

The amendment to regulation 65 has been added to the [consolidated regulations page](#) of the FPS Regulations and Guidance website.

Retained firefighter Employment Tribunal pension claims

Readers may be aware that a [Memorandum of Understanding](#) (MoU), as featured in [FPS Bulletin 55 - March 2022](#), was agreed on behalf of the legal parties to the “Matthews” claims on 9 March 2022 to provide a remedy to eligible retained firefighters by offering access to the FPS 2006 as special members, backdated to the start date of their employment. The MoU set out the scope and mechanism for the remedy to be implemented by way of a second options exercise.

However, a further issue arose during negotiation of the MoU around an inability to aggregate periods of pensionable service in the FPS as a retained firefighter with periods of service as a wholetime firefighter (“aggregation”).

This was addressed by affected retained firefighters (or their representatives) having the ability to give written notification of:

- their identity; and
- details of the factual and legal basis of any aggregation claims

with a view to discussions for six months from the MoU date leading to a resolution of those claims. The MoU stated that if agreed resolution of the aggregation issues was not reached by then that affected individuals could pursue Employment Tribunal (ET) claims to determine outstanding aggregation issues in relation to them.

The six-month period has elapsed, and we have recently been made aware that ET applications have been lodged by members of the Fire Brigades Union.

We have asked all FRAs to be alert to the receipt of ET claims brought on behalf of retained firefighters and inform the LGA immediately on such receipt.

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.

There have been no further queries added this month.

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FPS England SAB updates

Festive message from the Chair of the SAB

Please find as follows a message from the Chair of the Scheme Advisory Board (SAB):

“Dear Friends & colleagues,

2022 has been a year dominated by new beginnings. For the SAB that meant welcoming new members in the form of Councillor Frank Biederman, Andrew Scattergood and Tony Curry who have replaced Councillor Stephens, Matt Lamb, and Brian Hooper. We have recently learned that Councillor Redman will also be leaving the SAB and we thank him and the other leavers for their service.

There were also changes in the 2022 LGA Pension Team, with Elena Johnson joining Claire Johnson in the team which has been so ably led by Claire Hey in her role as Senior Pensions Adviser. What has not changed is the incredible amount of work and support that the team give to the SAB and to you all. I hope that they will enjoy a peaceful break this Christmas, though that may not be the case for Claire Johnson who has recently welcomed her first child into the world!

We saw the start of the creation of the regulatory measures to implement the Sargeant and Matthews remedies. The Home Office has engaged with the SAB with sessions on numerous topics as we all seek to ensure that the remedies are comprehensive and comprehensible. I know that many of you are also working your way through the various materials that are being shared in the members’ area of the Firefighters’ Pension Schemes Regulations website and your thoughts and comments are very welcome.

In addition to the legislative preparations for remedying member benefits, we have also seen a significant amount of traffic on the subject of Pensions Dashboards, with consultations galore. I recently [wrote to scheme managers and Local Pension Boards](#) to remind them of their upcoming dashboard duties.

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The post Covid freedoms that we have enjoyed in 2022 have meant that I have been able to meet, for the first time, some of the wonderful characters who do so much within the fire pensions industry, whether through formal committees or sharing of ideas. The highlight of the year for me in this regard was the [annual conference](#) held on 25 and 26 October, where we were treated to a range of thought-provoking talks and had the chance to hear the views of others and to network over a glass or three! As the conference chair, I do hope that everyone who attended went away with some useful thoughts about how to set about the urgent job of getting “remedy ready” and can pass the message on to those who were not able to attend.

On a personal note, the birth of my first grandchild came somewhat later than expected some 2 weeks after the conference. The birth of little Eleanor (Ellie for short) marks a new beginning for the family and, of course, as a proud grandmother I think that she is perfect. But those familiar with new-borns will appreciate that, while she arrives with the capacity to do so much, it is a struggle for her to focus yet and put things together. Sorry Ellie to burden you with analogies to pensions of all things, but this does bring me back to the challenges we all face over the new year to make sure that the slew of planned regulations work well together and ensure that we have the whole picture.

I hope that you have a great time over the festive season and come back refreshed for 2023 which promises to be a year of milestones achieved, hopefully!

Festive Best Wishes, Joanne Livingstone. Chair, English Firefighters' Pension Scheme Advisory Board”

[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.

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One session is taking place per month between June 2022 and January 2023, 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 session considered the timetabling of remedy cases once legislation is in place and the content of Remediable Service Statements (RSS). Material from some sessions has been added to a new page called '[age discrimination remedy – Provision Definition Documents](#)' in the member restricted area of the FPS Regulations and Guidance area for the benefit of practitioners.

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

HM Treasury publishes remedy Directions

On 14 December 2022, HM Treasury (HMT) made the [Public Service Pensions \(Exercise of Powers, Compensation and Information\) Directions 2022](#). They came into force on 19 December 2022 and apply to England, Northern Ireland, Scotland, and Wales.

The Directions set out how certain powers in the Public Service Pensions and Judicial Offices Act 2022 must be exercised. The Act gives relevant government departments powers to rectify Sargeant/ McCloud discrimination by making secondary legislation.

For the FPS, the Directions apply to the following powers in the Act:

- Powers to reduce or waive liabilities in relation to correction of benefits and tax relief on contributions adjustments – [section 18](#). This includes the facility for FPS 2006 contributions to be retained by the scheme until a deferred choice election is made.

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- Powers to make provisions for:
 - treatment of voluntary contributions paid in the FPS 2015 (Added Pension) – [section 20](#),
 - transfers in to or out of the scheme – [section 21](#), and
 - other specific circumstances – [section 22](#).
- A scheme manager’s power to pay compensation, setting out the scenarios in which compensation would apply – [section 23](#) (direct compensation).
- Powers to make regulations compensating members by adjustment to scheme pays debits – [section 24](#) (indirect compensation).
- Powers relating to tax relief on a contingent decision to buy Added Years – [section 25](#).
- The power to make regulations setting out how interest should be calculated and paid on amounts due to the remedy – [section 26](#). The Directions confirm the rates of interest that will apply to various payments, following consultation with the Government Actuary’s Department.
- The power to make regulations setting out the process to follow for paying amounts due to the remedy, including where amounts may be netted off - [section 26\(1\)\(b\)](#).
- Powers relating to Remediable Service Statements (RSS), including elements which must be provided – [section 29](#). The Directions confirm that the RSS must be combined with the Annual Benefit Statement, other than the first RSS which is issued.

The Directions and related documents have been added to the [related legislation page](#) of the FPS Regulations and Guidance website.

[PDP approach to governance of standards](#)

In [Bulletin 63](#) we let you know the Pensions Dashboards Programme (PDP) had published revised standards for connecting to the dashboards ecosystem.

PDP has since published its [approach to the governance of the standards](#). This sets out how PDP developed the standards, outlines their scope, and describes how they will go about setting and managing any future changes.

[Consultation on regulatory framework for dashboard operators](#)

On 1 December 2022, the Financial Conduct Authority (FCA) published a [consultation on the regulatory framework for dashboard operators](#).

Under these proposals, dashboard operators will be able to offer savers additional services that may improve engagement with pensions. These services could include investment advice (including robo-advice) or guidance, as well as modellers, calculators, and other similar tools. Before doing so, operators will need to meet rigorous conduct standards.

The consultation closes on 16 February 2023.

[Deferred connection guidance published](#)

On 12 December 2022, the Department for Work and Pensions (DWP) published guidance on [how to defer connection to pensions dashboards](#).

Public service schemes, including the FPS, must connect to the dashboards ecosystem within a connection window from 1 September 2024 to 30 September 2024. However, scheme managers can apply to DWP to defer the connection window in very limited circumstances. The deadline for applications to be made is 11 December 2023, though DWP request this is done as soon as possible.

The new staging date can be no later than 12 months after the original date, and connection must take place in the month leading up to that. The latest possible staging deadline for the FPS would be 30 September 2025.

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Action for FRAs: If you meet the limited circumstances and want to apply to defer connection, you must email pensionsdashboard@DWP.gov.uk as soon as possible and before 12 December 2023.

Early connection guidance updated

On 21 November 2022, the PDP published [updated statutory guidance on early connection](#).

FRAs must connect to the dashboards ecosystem within a connection window from 1 September 2024 to 30 September 2024.

However, integrated service providers may ask authorities to consider connecting earlier to reduce the number of clients connecting within the same window. Applications to connect early must be made to the Money and Pensions Service (MaPS), who will consult with the Pensions Regulator before deciding.

Action for FRAs: Decide as soon as possible if you want to connect early. If you do, apply to MaPS when their application forms are available.

PDP December newsletter

On 15 December 2022, PDP published its [December 2022 newsletter](#).

The newsletter contains articles on the design standards consultation, cleansing data in readiness for dashboards, a new updated glossary, access to recordings and Q & As for the standards webinars and a blog looking back at 2022.

Deputy Pensions Ombudsman

On 9 December 2022, the chair of the Pensions Ombudsman (TPO) announced that Anthony Arter will remain at TPO as part-time Deputy Pensions Ombudsman. Anthony's term as Pensions Ombudsman ends on 15 January 2023.

This is an interim appointment for up to 12 months.

See [the press release for more information](#).

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TPR's joint regulatory strategy update

On 7 December 2022, the Pensions Regulator (TPR) and the Financial Conduct Authority published an [update to their 2018 joint regulatory strategy](#). The strategy sets out how the two bodies work together to tackle issues in the pensions sector.

The update outlines their progress on the strategy's regulatory objectives and next steps in light of new strategic priorities. The update sets out eight ongoing workstreams covering:

- productive finance
- value for money
- regulatory framework for effective stewardship
- pension scams strategy
- defined benefit (DB) transfer advice
- DB schemes and transfer activity
- pensions dashboards
- supporting consumer decision-making.

As part of the next steps, both parties agree to continue their alliance to develop a consistent framework for assessing value for money, assess the stewardship regulatory framework in 2023 and continue to support the pensions dashboards initiative.

HMRC

HMRC publishes pension schemes newsletter 145

HMRC published [pension schemes newsletter 145](#) on 30 November 2022. The newsletter includes articles about:

- The [public service pensions remedy newsletter](#) published on 25 November 2022.

- The Managing Pension Schemes service including information on enrolling, viewing lists of schemes, managing user access, and viewing interest charges.
- Accounting for Tax (AFT) returns - schemes cannot submit new AFT returns for any quarter from April 2020 on the Pension Schemes Online service.
- Annual allowance – authorities are asked to remind members who exceeded their annual allowance for tax year 2021 to 2022 and do not have sufficient carry forward to declare this on their self-assessment tax return, even if the scheme is liable for the charge.

Action: FRAs and administrators to remind members who do not have enough carry forward to offset a tax charge for 2021 to 2022 to declare this on their self-assessment tax return.

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 first session of the new year is due to take place on Thursday 5 January 2023 at 10:00.

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

[6 December 2022 - Matthews policy positions and next steps](#)

[13 December 2022 - HMRC remedy tax consultation](#)

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.

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Legislation

Statutory Instruments

SI	Reference title
2022/1250	The State Pension Debits and Credits (Revaluation) Order 2022
2022/1251	The State Pension Revaluation for Transitional Pensions Order 2022
2022/1285	The Pensions Act 2004 (Disclosure of Restricted Information by the Pensions Regulator) (Amendment of Specified Persons) Order 2022

Useful links

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

Contact details

Claire Hey (Senior Pensions Adviser)

Telephone: 07825 731 924

Email: claire.hey@local.gov.uk

Claire Johnson (Firefighters' Pensions Adviser – Employers)

Telephone: 07920 861 552

Email: claire.johnson@local.gov.uk

Elena Johnson (Firefighters' Pensions Adviser – Governance)

Telephone: 07770 763 031

Email: elena.johnson@local.gov.uk

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FPS Bulletin 65 – January 2023

Welcome to issue 65 of the Firefighters’ Pensions Schemes bulletin. We wish all of our readers a belated Happy New Year.

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

If you have any comments on this bulletin, 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	14 and 28 February 2023
FPS Technical Working Group	17 February 2023
FPS Communications Working Group	14 March 2023
North East regional group	15 March 2023
SAB	23 March 2023
SAB	8 June 2023
SAB	14 September 2023
SAB	14 December 2023

Actions arising

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

[Template member consent letters](#): FRAs to identify affected members of the pension scheme who may need to be sent for an ill-health reassessment and arrange for the appropriate member consent letter to be sent to them.

[SAB levy 2022-23 – Request for Purchase Order numbers](#): FRAs to provide a valid purchase order number, stating the number of employees eligible to join one of the Firefighters' Pension Schemes as of 1 April 2022, using the form provided with the SAB 2022-23 levy letter.

FPS

Ill-health reassessment factsheet updated

In [FPS Bulletin 63 – November 2022](#), we published an [ill-health reassessment factsheet](#) to help FRAs determine which individuals require a reassessment of their ill-health determination as a result of remedy implementation. This has recently been updated to include FPS 2006 special members. We sought clarity from the Home Office to confirm that special members should be treated in line with FPS 1992 members due to them being assessed against a normal pension age of 55.

Template member consent letters available

Letters for scenarios one and two, seven, and nine as referred to in the [ill-health reassessment factsheet](#) have now been added to the [Retrospective remedy webpage](#).

ACTION for FRAs: Identify affected members of the pension scheme who may need to be sent for an ill-health reassessment and arrange for the appropriate member consent letter to be sent to them.

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Potential Industrial Action

In [FPS Bulletin 61 - September 2022](#), we provided information about how strike action affects a member's pension benefits, how the amount that the member needs to repay is calculated, and the importance of continuing to record service breaks. Please refer to the information given in that bulletin to help resolve any queries that you have regarding industrial action. The LGA is planning to provide sample communications for FRAs if industrial action goes ahead, and members wish to repay the missing period of service.

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: compensation scheme (page 50).

FPS England SAB updates

Barnett Waddingham Case Study on FPS Remedy 2015 – Your Questions Answered Member Communications

In [FPS bulletin 54 - February 2022](#), we advised that following the Scheme Advisory Board (SAB) [meeting of 30 September 2021](#) an action was taken to commission a suite of illustrative member scenarios to provide members with a better understanding of the implications of the McCloud/ Sargeant remedy on their benefits. This included a selection of members' personas across the schemes, with benefits illustrated at a range of key retirement milestones.

Barnett Waddingham was appointed to deliver this work following a successful procurement exercise and as part of the project, warm-up communications were produced to answer some key concerns or recurring questions that members have about the changes which took place on 1 April 2022 and beyond.

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The [FPS 2015 Remedy 'fact checker'](#) was developed by Barnett Waddingham, in collaboration with the SAB the Board secretariat, and the Scheme Management & Administration committee.

The document text was added as a new page to the [FPS Member 2015 Remedy section](#), with the PDF available as a download.

Barnett Waddingham has since produced a case study about working with the scheme to provide this information for members on the remedy changes and this can be read at [Appendix 1](#).

SAB levy 2022-23 – Reminder for Purchase Order numbers

In [FPS bulletin 63- November 2022](#), we confirmed that the SAB budget for 2022-23 had been approved by the minister.

The total levy for the 2022-23 year will be £6.27 per firefighter, which is calculated at £4.39 for the SAB and £1.88 for employers. A letter was sent by email to Chief Fire Officers and HR Directors on 21 November 2022 advising them of this.

Devolved FRAs have also been sent levy requests regarding the employer advice service provided to them by the LGA.

Please can we politely remind FRAs, if they have not done so already, to provide a valid purchase order number, stating the number of employees eligible to join one of the Firefighters' Pension Schemes as of 1 April 2022, using the form provided with the letter in order that an invoice can be sent accordingly.

ACTION: FRAs to provide a valid purchase order number, stating the number of employees eligible to join one of the Firefighters' Pension Schemes as of 1 April 2022, using the form provided with the SAB 2022-23 levy letter.

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 2022 and February 2023, with two topics discussed at each meeting. These discussions will help to inform the drafting of secondary legislation, ahead of formal consultation. Formal consultation is now expected to commence during February 2023.

The most recent session considered Annual Allowance and bereavement. Material from some sessions has been added to a new page called '[age discrimination remedy – Provision Definition Documents](#)' in the member restricted area of the FPS Regulations and Guidance area for the benefit of practitioners.

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

PDP publishes consumer protection video

The Pensions Dashboards Programme (PDP) has recently published [an explainer video on consumer protection](#).

The video explains what protections will be in place to ensure dashboards are safe and secure.

Please see [the consumer protection page of PDP's website](#) for more information on this topic.

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Automatic Enrolment trigger remains the same

On 26 January 2023, Department for Work and Pensions (DWP) published its [review of the automatic enrolment thresholds for 2023/24](#).

The Pensions Act 2008 requires DWP to annually review various thresholds relevant for automatic enrolment rules. As is relevant for the FPS, the earnings trigger remains at £10,000 for 2023/24.

Dominic Harris starts as Pensions Ombudsman

On 16 January 2023, Dominic Harris started as the Pensions Ombudsman.

Dominic's term of office is five years.

Dominic has recently sent an introductory message to TPO's contact list:

"The New Year has brought with it a "New Ombudsman", and so I thought I would take this opportunity to introduce myself and say how excited I am to be joining TPO.

This is an organisation that is so important in ensuring that pension scheme members and their dependants have access to support and justice, for free, in what can often be complex and stressful disputes. It really does level the playing field. I have looked on from the other side of the fence at the work

TPO does – and am proud to be a part of it over the next few years. Clearly, Anthony Arter has done a sterling job over his tenure, and I am looking forward to building on his great work.

I look forward to understanding better how TPO works and some of the challenges we face. It is so important that we continue to work collaboratively to improve dispute resolution across the industry. I hope I will be able to meet many of you over the coming months."

You can find out more about Dominic on the ['who we are' page of TPO's website](#).

Please email stakeholder@pensions-ombudsman.org.uk if you would like to join TPO's contact list.

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[Public sector unions granted judicial review over McCloud cost remedy](#)

In [FPS bulletin 62 – October 2022](#) we confirmed that public sector unions had been granted a judicial review in relation to the McCloud/ Sargeant remedy costs in the cost control mechanism. We can now confirm that the dates for the hearing are from 30 January to 3 February 2023.

HMRC

[LGA and SAB responses to the consultation on the Public Services Pension Scheme \(rectification of unlawful discrimination\) \(Tax\) Regulations 2023](#)

In [FPS bulletin 63-November 2022](#), we advised that HMRC had published a [technical consultation on a draft statutory instrument](#), which ensures the pensions tax framework will apply as intended to pension scheme administrators and members affected by the public service pensions remedy. The consultation closed on 6 January 2023.

The consultation sought views from pension scheme administrators on the draft regulations. The regulations set out changes to how the pensions tax rules will apply to pension scheme administrators and members of public service pension schemes as a result of the public service pensions remedy.

The regulations will make changes to how pensions tax legislation operates in certain circumstances, including changes to how schemes will need to report and pay extra tax charges or reclaim overpaid tax and ensure that schemes can pay pension benefits as authorised payments.

This legislation is intended to take effect from 6 April 2023, but some provisions will have a retrospective effect.

We are pleased to share both the LGA and SAB responses to the consultation on the Public Services Pension Scheme (rectification of unlawful discrimination) (Tax) Regulations 2023 as follows:

[LGA response to the consultation on the Public Services Pension Scheme \(rectification of unlawful discrimination\) \(Tax\) regulations 2023](#)

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[SAB response to the consultation on the Public Services Pension Scheme \(rectification of unlawful discrimination\) \(Tax\) regulations 2023](#)

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.

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

[5 January 2023 – Remedy timetabling](#)

[26 January 2023 – HMT Remedy Directions](#)

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

Useful links

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- [HMRC Pensions Tax Manual](#)
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- [LGPS Regulations and Guidance](#)
- [LGPC Bulletins](#)
- [LGPS member site](#)

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- [Scottish Public Pensions Agency - Firefighters](#)
- [Welsh Government Fire circulars](#)

Contact details

Claire Hey (Senior Pensions Adviser)

Telephone: 07825 731 924

Email: claire.hey@local.gov.uk

Claire Johnson (Firefighters' Pensions Adviser – Employers)

Telephone: 07920 861 552

Email: claire.johnson@local.gov.uk

Elena Johnson (Firefighters' Pensions Adviser – Governance)

Telephone: 07770 763 031

Email: elena.johnson@local.gov.uk

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