

Notice of Meeting

Surrey Local Firefighters' Pension Board

**Date & time**

Thursday, 27 April
2023 at 10.30 am

Place

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

Contact

Joss Butler
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Chief Executive

Joanna Killian

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This meeting will be held in public. If you would like to attend and you have any special requirements, please contact Joss Butler on joss.butler@surreycc.gov.uk.

Board 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 & 24 FEBRUARY 2023 (Pages 5 - 18)

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

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 (21 April 2023).
2. The deadline for public questions is seven days before the meeting (20 April 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 19 - 26)

The Board to note the Action and Recommendation Tracker.

6 SCHEME MANAGEMENT UPDATE REPORT (Pages 27 - 32)

The Board has requested an update on Scheme management activities.

7 XPS - SURREY FIRE & RESCUE AUTHORITY PENSION BOARD REPORT

Report to follow.

8 FIRE BULLETINS

(Pages
33 - 64)

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

9 RISK REGISTERS

(Pages
65 - 78)

To note the Risk Registers.

10 DATE OF THE NEXT MEETING

The next meeting will be on 27 July 2023.

Joanna Killian
Chief Executive
Published: 19 April 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)

Members:

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

Benedict Mulliss (substitute member) was also in attendance

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

MINUTES of the meeting of the **INFORMAL SURREY LOCAL FIREFIGHTERS' PENSION BOARD** held at 10.30 am on 24 February 2023 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 Thursday, 27 April 2023.

Members:

*In attendance

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

1/23 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS [Item 1]

The Chairman stated that the meeting would be an informal meeting as the attendance did not meet quorum. In order for the meeting to be quorate, at least one employer representative and one member representative was required to be in attendance in person.

Apologies received from Paul Bowyer.

2/23 MINUTES FROM THE PREVIOUS MEETING: 10 NOVEMBER 2022 [Item 2]

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

The minutes would be formally agreed at the next formal meeting.

3/23 DECLARATIONS OF INTEREST [Item 3]

None received.

4/23 QUESTIONS AND PETITIONS [Item 4]

There were none.

5/23 SURREY FIREFIGHTERS' PENSION BOARD ACTION AND RECOMMENDATION TRACKER [Item 5]

Witnesses:

Sally Wilson, Scheme Manger
Carrie Pearce, Pensions Project Officer
Phillip Johnson, Senior Pensions Advisor

Key points raised during the discussion:

1. In regard to A8/22, a member of the Board asked whether the action was at a point where it could be closed. The board agreed to close the action.
2. In regard to Action A9/22, a Member of the Board asked whether the action was at a point where it could be closed. The Chairman highlighted that the action was due to be closed which was agreed.

Actions/ further information to be provided:

None.

Recommendations:

The Board noted the action tracker.

6/23 SCHEME MANAGER UPDATE REPORT [Item 6]

Witnesses:

Sally Wilson, Scheme Manger
Carrie Pearce, Pensions Project Officer
Phillip Johnson, Senior Pensions Advisor

Key points raised during the discussion:

1. The Scheme Manager introduced the report and highlighted detail related to McCloud - Age Discrimination, 10% Pensionable Allowance, Modified Scheme, Pension Policies, Audit, Pension Team Resourcing, Pensions Dashboard, the Public Service Governance and Administration Survey, Communications, Guaranteed Minimum Pension (GMP) Reconciliation, Training from the LGA as outlined in the report.
2. In regard to the Modified Scheme, the Chairman asked what the purpose was for the data collection exercise. The Pensions Project Officer explained that the information submitted, which was submitted along with other Fire and Rescue Authorities, was to contribute to the legislation and standard assumptions.
3. In regard to the pensions dashboard, the Chairman noted that the meeting with XPS was coming soon and requested that the Board receive an update at its next meeting. The representative from XPS explained that a team within XPS's Business Services Group had been undergoing a procurement exercise with integrated service providers and that an announcement was due on XPS's preferred service provider for the dashboard.
4. In regard to communications, the Chairman asked when the next automatic reenrolment was scheduled. The representative from XPS explained that automatic reenrolment was different for each authority.

The Scheme Manager said that they would provide a response outside the meeting. A member of the Board said that they agreed it would be helpful to circulate this information.

5. A Member of the Board said that the SharePoint site was looking really good and congratulated those involved. It was further said that it would be interesting to monitor the number of users who had accessed the SharePoint.
6. The Chairman commended the service for the creation of the summary on page 4 and said that it was very useful.

Actions/ further information to be provided:

A1/23 - Members to be provided with an update following a meeting with XPS, scheduled for early March, related to the Pension Dashboard.

A2/23 - Member to be provided with detail related to the next scheduled date for automatic reenrolment.

Resolved:

The Board noted the report.

7/23 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 provided Members with a brief overview of the report. Full detail could be found from 25 of the agenda.
2. In regard to common data, the Chairman said that it would be helpful for the Board to be provided with the number of deferred members that were past retirement age and had not been in contact with XPS. The representative from XPS agreed to provide the information.
3. In regard to performance, the Chairman asked whether XPS could continue with their excellent performance over the next period when taking into consideration the work required around the end of the tax year. The representative from XPS said that work related to tax was completed by a separate team and that they hoped to continue the current rate of performance. The Board noted details on XPS's internal team structures.
4. In regard to complaints, a Board Member said that they were not aware of any complaints coming through since the last meeting. Further to this, the Board Member thanked XPS for making the complaint process clearer on the queries webpage.
5. In regard to the member self-service, a Board Member said that there was good information included however the information was lost when transferred to the Portal and so members of the scheme needed to return to the self-service to access the information. The Board Member said that it would be helpful to have all the information in one place.
6. In regard to Immediate Detriment, a Board Member said that it would be beneficial to manage members expectations on its progress.

Actions/ further information to be provided:

A3/23 - To provide the Board with detail on the number of deferred members that were past retirement age and had not been in contact with XPS.

Resolved:

The Board noted the report.

8/23 FIRE BULLETINS [Item 9]

Witnesses:

Sally Wilson, Scheme Manager

Key points raised during the discussion:

1. The Board noted the bulletins.

Actions/ further information to be provided:

None.

9/23 RISK REGISTER [Item 8]

Witnesses:

Carrie Pearce, Pensions Project Officer
Sally Wilson, Scheme Manger
Phillip Johnson, Senior Pensions Advisor

Key points raised during the discussion:

1. The Pensions Project Officer noted that the format of the risk register had been updated due to updates to the LGPS, council and service risk registers. It was therefore decided to use the same risk register format as the Local Pension Board. Members noted that risks had been put into different categories and that four risk duplications were identified and removed. In regard to scoring, the officer stated that scoring had been applied to each category allowing for a more consistent approach and showed clearly any financial impacts. The template also highlighted the highest risks for the service to consider.
2. The Board noted the ongoing work to record and retain knowledge of processes from bank staff to the pension team.
3. In regard to Unit 4, the Chairman asked whether historic data could still be accessed following the transfer. The Pensions Project Officer agreed to provide a response following the meeting.
4. The Pensions Project Officer said that the new format was much easier for officers to work with compared to the previous template.
5. The Board supported the new format for the risk register.

Actions/ further information to be provided:

A4/23 - To provide the Board with details on whether historic data could still be accessed following the transfer to Unit 4.

Resolved:

The Board noted the risk register.

10/23 DATE OF THE NEXT MEETING [Item 10]

The Board noted the date of the next meeting.

Meeting ended at: 11.30 am

Chairman

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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	Matthews / Retained Project 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>April 2023: A communication will be sent to all affected members to confirm no further action is due to take place until the legislation is implemented in October 2023.</p>	
<p>30 April 2020</p> <p>A16/20 & A1/22 (combined)</p>	<p>10% Project</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>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 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.</p>	<p>Ongoing</p>

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
13 January 2022 A1/22		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>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 November 2022. Members of Priority Group 3 (those who retired prior to 2014) are due to be contacted in February 2023.</p> <p>April 2023: Members of Priority Group Three were contacted at the end of February and beginning of March 2023. All commuted lump sums have been paid to members who are due to receive a benefit. Pension arrears due to be paid at the end of June 2023.</p>	

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				Members of all remaining Priority Groups were sent a communication on 13 April 2023.	
30 April 2020 A20/20 (Informal meeting due to Covid-19)	GMP Exercise 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>XPS have been working through the data needed required by Mercer to carry out the next step of the GMP exercise. Mercer provided a template to XPS which will assist with the rectification element of the project.</p> <p>November 2022: XPS were due to provide data extracts to the Service by the end of September 2022 which in turn would be provided to Mercer. XPS have not been able to finalise this piece of work and the Service are waiting for further information for an expected completion date.</p> <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> <p>April 2023: Mercer and XPS are in communication with each other to confirm the template to use and the data that is required. It is still hoped the project will be completed before the end of 2023.</p>	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
25 November 2021 A7/21	Address Update 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> <p>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.</p> <p>April 2023: XPS have confirmed in their report, that there are a number of addresses returned. The team at XPs are working through the returns and a verbal update will be provided at the Board meeting.</p>	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
28 July 2022 A4/22	The Pension Regulator (TPR) six key processes 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> <p>April 2023: No further updates have been shared regarding the results of the TPR 2023 survey.</p>	Ongoing
28 July 2022 A7/22	Member Email Address Update 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 which provides a further platform to gain information from members.</p> <p>April 2023: No update on this area due to the other tasks within the team which have taken priority.</p>	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
10 November 2023 A10/22	Feedback on XPS 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 April 2023: No further complaints had been logged up to February 2023. However, feedback on the service received from XPS has been less positive recently. Communications are underway with the account manager to work through the next steps.	Ongoing
10 November 2023 A11/22	Pension Scams 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	April 2023: XPS will provide a verbal update at the Local Pension Board meeting.	Ongoing
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
24 February 2023 A1/23	Pensions Dashboard Scheme Management Update Report	Members to be provided with an update following a meeting with XPS, scheduled for early March, related to the Pension Dashboard.	Scheme Manager	April 2023: An update on the meeting with XPS has been provided in the Scheme Manager report.	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
24 February 2023 A2/23	Scheme Management Update Report	Member to be provided with detail related to the next scheduled date for automatic reenrolment.	Scheme Manager	April 2023: An update on the meeting on this topic has been provided in the Scheme Manager report.	Ongoing
24 February 2023 A3/23	Member Tracing XPS – Surrey Fire & Rescue Pension Board Report	To provide the Board with detail on the number of deferred members that were past retirement age and had not been in contact with XPS.	XPS / Scheme Manager	April 2023: XPS have confirmed in their report of one member whom exceeds normal pension age for a deferred beneficiary. This member is based overseas. Actions will be taken by XPS to locate this member.	Ongoing
24 February 2023 A4/23	Risk Register	To provide the Board with details on whether historic data could still be accessed following the transfer to Unit 4.	Scheme Manager	April 2023: An update on the meeting on this topic has been provided in the Scheme Manager report.	Ongoing



Surrey Local Firefighters' Pension Board 27 April 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 continued working tirelessly on the data collection exercise. The wider team have also been assisting with the exercise.

2.2 A revised internal timeline was agreed with XPS, whereby first data return for members of the 1992 scheme, was due to be returned by the end of February 2023. However due to sickness and the extensive time to check the necessary information, a new deadline of mid-April has been agreed with XPS.

2.3 A risk register has been completed which is specific to the McCloud Age Discrimination project. This file forms part of the Bord documents pack and is available for Board members to review. The top two risk identified from the review are:

- Consequences if the data collection not completed on time. Risk number 1.
- Impact if XPS delay providing member's pensions, should there be a substantial number of members retiring once the new legislation is in force. Risk number 4.

2.4 The McCloud consultation was released for review on 28 February 2023. All Fire and Rescue Authorities (FRA's) have until 23 May 2023 to respond to the consultation. The Pensions Team are in the process of writing an overview of the consultation. The response will be shared with the members of the Board ahead of the consultation deadline. The Local Government Association (LGA) will also respond to the consultation which will be shared with the fire sector and the response will be reviewed by the Pensions Team.

10% Pensionable Allowance

2.5 Reminder letters were sent in February 2023 to members of Priority Group Two whom the Service has not yet heard from. To date 26 members out of 35 members of this cohort have paid their contributions and have now received their additional monies.

2.6 All members of Priority Group Three were sent their letters at the end of February 2023 and in early March 2023. The communication was sent to both members who were in scope and due additional benefits, and those who were out of scope and therefore not due any additional pension payments. For members who were due additional payments, the commuted lump sums were paid on 15 March 2023. Their pension arrears will be paid by the end of June along with their pension increases. This allows a further calculation to be completed and to take into account the impact of the pension increase in April 2023.

2.7 The Finance Team have received regular updates from the Pension Teams of the monies which needs to be paid for by the Service in relation to this exercise. This project continues to be recorded as a financial risk and is considered in budget monitoring.

2.8 The Pensions Team's immediate priority will turn to completing the McCloud data collection exercise before re-commencing with the 10% project. A communication to update members of Priority Groups Four to Seven will be sent in April 2023. The letter informs members the project is still ongoing and their personalised calculations will be sent to them by the end of 2023.

Matthews - Modified Scheme – On-Call Access

2.9 The Pensions Team have been notified by the LGA that the consultation for the Matthews legislation is now open for review. The Pensions Team will respond to the consultation by the set deadline of 9 June 2023. It is important to note, that the new legislation, is now due to come into force in October 2023. This is one month later than previously anticipated.

2.10 A letter to all members affected by the Matthew's second options exercise has been drafted. Since the last letter was sent in May 2022, the communication confirms the consultation on proposed changes to Firefighters' Pension Scheme (England) 2006 for Retained Firefighters' Pension is now open for FRA's to respond to. There are no other changes to update affected members with.

2.11 A communication is also in place to send to members who have previously stated they would not like to be contacted regarding the on-call pension scheme. A decision has been taken to contact this cohort again, as the eligibility criteria has changed since members were last contacted, and the new conditions may be more favourable for members. The change in eligibility criteria means a member may be able to utilise service from the start of their on-call career which commenced pre April 2000 on the basis they were employed between 7 April 2000 until 5 April 2006. Previously the on-call pension was only for employment during the period 7 April 2000 until 5 April 2006.

2.12 The consultation for Matthews was released on 31 March 2023. All Fire and Rescue Authorities (FRA's) have until 9 June 2023 to respond to the consultation. The Pensions Team

are in the process of writing an overview of the consultation. The response will be shared with the members of the Board ahead of the consultation deadline.

Pension Policies

2.13 The first draft of the abatement policy has been completed and is with the Scheme Manager to review before it is sent to the Workforce Working Group (WWG). Once approved by the WWG it will be placed on the Pensions SharePoint page.

Spring Budget

2.14 The Spring budget was presented by the Government on 15 March which featured key benefits for pension members. Firstly, the annual allowance limit has been increased by £20,000. This enables a member's pension pots to grow up to £60,000 in the 2023/2024 tax year and going forward before tax charges may be payable. Secondly, the lifetime allowance will also be abolished from 6 April 2023 onwards. There is now no limit to the amount of capital a member has across any of their pension schemes, however, pension commencement lump sums will remain restricted. A communication regarding the above was sent via Surrey Fire and Rescue Service (SFRS) News on 17 March 2023 to inform members of the changes.

Pay Award

2.15 On 7 March 2023 it was confirmed the FBU agreed to the pay proposal from Fire service employers. The award consists of 7% increase backdated to July 2022 and a further 5% increase from 1 July 2023. Further communications are expected from LGA as the pay proposal may impact on members tax liabilities. The Pensions Team will keep members informed.

Pensions Dashboard

2.16 A meeting took place between XPS Administration and the Pensions Team regarding the pensions dashboard. XPS confirmed the data fields held on their system is being matched to the specialist software which will be used for the dashboard.

2.17 XPS have also been reviewing the Service's data which XPS will store on our behalf on their system. At present there are no concerns with the Service's data. A data scoring exercise will take place in due course, which will highlight any data which is missing. The McCloud data collection exercise, which is underway, will help to increase the quality of data.

2.18 The Pensions Team were notified by the LGA on 3 March 2023 that the Department for Work and Pensions had announced a reset which will push back the delivery of the pensions dashboard. This is due to the architecture of the site requiring a review. The new delivery date of the dashboard and the revised staging date for the Firefighter Pension Scheme, have not yet been announced.

Guaranteed Minimum Pension (GMP) Reconciliation

2.19 Mercer and XPS are now in contact with each other to finalise the GMP project. The reconciliation project is due to be completed by the end of 2023. Mercer are currently waiting for XPS to provide the data required for the rectification phase of the project.

Auto Enrolment

2.20 In recent months, there has been a slight increase to the number of people considering or wishing to opt out of the firefighter pension scheme.. Should a member choose to opt out of the scheme, eligible members will be automatically re-enrolled into the scheme within the Service's three year cycle. The next auto enrolment cycle will take place in 2025 for all eligible members. The Pensions Team will provide an update in early 2025 to alert members.

Unit 4 / My Surrey

2.21 It has been confirmed that Unit 4 / My Surrey will be going 'live' later this year. Conversations have taken place with the project team to ensure the files shared between XPS and the current SAP system will work with the new software. No areas for concern have been identified.

2.22 Discussions have also taken place with the Data Archiving team responsible for storing data from SAP once Unit 4 is live. It has been confirmed SAP will be available as a read only option until September 2023, and the Pensions Team can have access to the data archiving platform.

1992 Pension Scheme Commutation Factor Update

2.23 The Government's Actuary Department (GAD) released an update on 3 April to confirm the commutation factors for the 1992 Firefighters Pension Scheme (1992 scheme) has increased with immediate effect. Whilst the 1992 scheme is closed to future accrual, members who have 1992 Scheme membership will now benefit from an increased commutation factor. The commutation factors for the 1992 scheme are dependent on a members age at retirement. For example, if a member retires at 50 years of age, the commutation factor on their lump sum has now increased from 24 to 26.2.

Communications

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

- **10% Allowance Project:** letters were sent to all Priority Group Three members. The communication confirmed to the member whether they were in or out of scope to receive an additional commuted lump sum and pension arrears. The letters were sent on 10 March 2023.
- **10% Allowance Project:** letters were sent to all members of Priority Group Four to Seven members to provide an update that the project is still underway and they will be contacted by the end of 2023.
- **Call for substitutes:** An advert was placed in SFRS News on 3 March 2023 to notify members of a substitution place which was available on the Local Firefighter's Pension Board.

- **Impact of the Spring budget:** On 17 March 2023, an update was provided in SFRS News to inform members of the how the budget announcement may affect their firefighter pension schemes.
- **McCloud Update:** On 17 March 2023, an article in SFRS News informed members of what to expect once the McCloud legislation is implemented in October 2023.
- **Update to Station Commanders:** An email was sent to all Station Commanders on 28 March 2023, to share details of the McCloud ruling and how this will impact affected active members from October 2023.

2.25 The Team have recently reviewed the SharePoint pages and added additional content. The changes are now available for all members to view and include:

- Further information on the Firefighter Pension Schemes page.
- A Planning for Retirement page with retirement specific Frequently Asked Questions (FAQ).
- A separate updated general FAQ page.
- Dedicated page to the McCloud / Age Discrimination project.

2.26 Since the Pensions SharePoint site was shared with members of the Service, there has been a total of 1058 visits to the site. As of end of March 2023, 29 individual members have visited in the past 30 days. The average user spends 12 minutes visiting the site.

New Pension Board Member

2.27 An advert was placed in SFRS News to inform members of the Service of substitution places available on the Local Firefighter Pension Board. One application was received and submitted to the panel. The panel unanimously confirmed the applicant was appointed. The successful applicant has been notified and is due to attend the Local Firefighter's Pension Board meeting on 27 April 2023.

Training from the LGA

2.28 Training for the members of the Local Firefighter's Pension Board took place on 12 April 2023.

2.29 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 below. The table will shortly be updated to reflect the next steps SFRS is to take.

Project	LGA Advised Actions	Status
McCloud / Age discrimination	<ol style="list-style-type: none"> 1. Monitor optant outs. 2. Update websites and other resources. 3. Consider possible upcoming Independent Qualified Medical Practitioner (IQMP) referrals. 4. Collection and cleansing of remedy data. 	<ol style="list-style-type: none"> 1. Ongoing 2. Ongoing 3. Underway 4. 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. 	<ol style="list-style-type: none"> 1. Underway 2. Underway 3. Underway
Matthews / Modified	<ol style="list-style-type: none"> 1. Respond to consultation (in due course). 	<ol style="list-style-type: none"> 1. 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. Underway 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

2.30 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.

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Sources/background papers: N/A

Annexes: N/A



Surrey Local Firefighters' Pension Board

27 April 2023

FIRE BULLETINS

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

Bulletins 66, and 67 (Annex 1 and 2) have been published since the last Board meeting.

- Bulletin 66 notified readers of a new webpage, now available on the FPS Member website, relating to the [2015 Remedy](#). The new webpage provides useful information for members as well as a timeline for those affected. A notice to members was included in the SFRS newsletter dated 17 March 2023 and a summary has been added to the SFRS pension SharePoint site.
- Fire and Rescue Authorities (FRA's) were reminded of the need to compile the relevant data needed to prepare for the 2015 Remedy. The Pension Team are currently working with XPS Administration to complete the data collection exercise ahead of 1 October 2023.
- The bulletin confirmed there will be no change to the [FPS employee and employer contribution rates for 2023-24](#). All relevant thresholds and rate changes for 2023 are available in the [FPS annual update 2023](#), and the legislation is available on the FPS website under [Statutory Instruments](#).
- Bulletin 66 notified FRA's of [The Bereavement Benefits \(Remedial\) Order 2022](#). This order extends the eligibility for Widowed Parent's Allowance (WPA) and the higher rate of Bereavement Support Payment (BSP) to include surviving cohabiting partners with dependent children, who were not in a legal union with the deceased on the date of death. Eligible beneficiaries can claim back to 30 August 2018.
- Bulletin 66 notified readers of the [Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) Regulations 2023](#). The legislation comes into force on 6 April 2023 and sets out changes to pension tax rules because of the 2015 Remedy. The regulations include changes to how schemes will need to report and pay, or reclaim, extra tax charges relating to the 2015 Remedy. FRA's, together with scheme administrators, must ensure they are implementing and reporting the extra tax charges correctly and ensure that pension benefits can be treated as authorised payments.
- The Bulletin confirmed that, on 20 February 2023, the HM Treasury issued written statement HCWS566 confirming the Public Service Pension Indexation and

Revaluation for 2023. This statement confirmed that FPS deferred pensions, and pensions in payment, will be increased in April 2023 by 10.1 per cent. In addition, the earnings element of revaluation for active members will be 7 per cent.

- Bulletin 67 notified readers of the publication of the [Consultation on the Firefighters' Pension Schemes \(Remediable Service\) Regulations 2023](#), by the Home Office. These regulations outline the proposed framework to deliver the retrospective elements of the 2015 Remedy. The Pension Team are working on a response to the consultation which will be submitted to the Home Office before 23 May 2023.
- Bulletin 67 reminded FRAs of the need to submit pensions accounting data for 2021/22 and 2022/23 as part of the Top Up Grant arrangements for 2023.

The Home Office have indicated that they will be undertaking additional internal checks on any financial data submitted and require all FRAs to provide:

- electronic copies of the trial balances from their audited accounts where the pensions income/expenditure data was extracted; and
- any post balance sheet adjustment events (showing audit adjustments).

The Home Office will be writing to FRAs to formally commission this data in April. However, FRAs must begin preparing now to ensure the correct data is extracted from their accounts and collate the supporting evidence for their claims. The Pension Team is currently liaising with the finance team to ensure the returns can be submitted via the DELTA online data collection system.

- The bulletin notified readers that the FPS websites are being upgraded on 19 April 2023 and will be unavailable for most of the morning whilst the pages are updated.
- The bulletin advised that, on 10 March 2023, the [High Court ruled](#) in favour of HM Treasury, regarding the inclusion of the McCloud/ Sargeant remedy in the cost cap mechanism. Permission to appeal was denied, however, it is possible for the FBU to apply for permission directly to the Court of Appeal.
- The bulletin notified readers that, on 3 March 2023, the [Department for Work and Pensions \(DWP\)](#) confirmed it supports expanding Auto Enrolment. [The Pensions \(Extension of Automatic Enrolment\) \(No.2\) Bill 2023](#) proposes to give the government powers to make regulations which:
 - abolish the Lower Earnings Limit for contributions – currently £6,250, and
 - reduce the age of auto enrolment for eligible jobholders – down from 22 to 18.

The government has not given a timetable for when the changes may take effect.

- Bulletin 67 confirmed that the government will legislate to amend pension dashboard connection deadlines. This follows a [DWP ministerial statement](#) announcing the delays. However, it is not clear if connection deadlines for public service pension schemes will change.
- The bulletin advised that The Pensions Regulator (TPR) will write to schemes affected by the announcement and has published updated [guidance](#) to help schemes focus on what they should be doing now to prepare for their dashboard duties.
- Bulletin 67 confirmed the [Spring Budget 2023](#), included changes enacted by [The Finance \(No.2\) Bill 2022/23](#), published on 23 March 2023. The changes come into effect from 6 April 2023 and include:

- increasing the annual allowance from £40,000 to £60,000.
- increasing the money purchase annual allowance from £4,000 to £10,000.
- increasing the adjusted income level for the tapered annual allowance from £240,000 to £260,000.
- increasing the minimum tapered annual allowance from £4,000 to £10,000.
- abolishing lifetime allowance (LTA) charges arising in relation to benefit crystallisation events occurring on or after 6 April 2023.
- allowing members to accrue new pension benefits without losing enhanced protection or fixed protection where the protection was applied for before 15 March 2023.
- taxation of the LTA excess lump sum, and any other payments that would have incurred an LTA charge, to be taxable as pension income at marginal rate.

Legislation will be introduced in a future Finance Bill to remove the lifetime allowance from pensions tax legislation.

The SAB's actuarial adviser, First Actuarial has produced a [bulletin](#) which also covers these changes. The Pension Team has included a notice in the SFRS newsletter, dated 17 March 2023, to highlight these changes to members.

- The bulletin advised that the PDP has a new [website homepage](#) and includes FAQs on connection deadlines and the revised timeline.
- Bulletin 67 highlighted a blog by the [Government Actuaries Department \(GAD\)](#) and the challenges facing public sector pension schemes to meet the pensions dashboard data requirements. It emphasises the need for regular data quality reporting and cleansing in public sector schemes where the data position is never 'static' due to the constant ebb and flow of members.

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Annexes

Annex 1: FPS Bulletin 66

Annex 2: FPS Bulletin 67

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FPS Bulletin 66 – February 2023

Welcome to issue 66 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	14 and 21 March 2023
FPS Communications Working Group	14 March 2023
North East regional group	15 March 2023
South East regional group	15 March 2023
Midlands regional group	22 March 2023
SAB	23 March 2023
Data conference	17 May 2023
SAB	8 June 2023
SAB	14 September 2023
FPS AGM	19 and 20 September 2023
SAB	14 December 2023

Actions arising

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

[Data collection for the 2015 remedy](#): FRAs to ensure that the data collection template is completed and sent to administrators so that administrators and FRAs are prepared for the implementation of remedy from 1 October 2023.

[Pension scheme migration](#): Migrate to the Managing Pension Schemes service as soon as possible.

[The Bereavement benefits remedial order 2022](#): FRAs and administrators to share this information in communications with pensioners.

FPS

New webpage on the FPS Member website

We are pleased to let you know that a new page relating to the 2015 Remedy is now available for members on the FPS Member website. The new page provides information on:

- [Whether members may be affected by remedy](#)
- [What members can expect if they have already retired](#)
- [What members can expect if they plan to retire before October 2023](#)
- [What active and deferred members can expect](#)

These pages provide a useful timeline for those affected, with the aim of helping to manage their expectations and provide useful information for them.

Data collection for the 2015 Remedy

In the [FPS Bulletin 44- April 2021](#), we advised that remedy data collection tools had been created with the assistance of software suppliers and the Fire Communications Working Group to help FRAs compile the relevant data needed to prepare for the 2015 Remedy. To credit members with their original legacy scheme membership for

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the remedy period, administrators will need additional data from FRAs to rebuild the final salary record. For example, an unprotected member who transitioned to FPS 2015 from FPS 1992 on 1 April 2015 and remains in employment will need a final salary record creating for the full seven years from 1 April 2015 to 31 March 2022. The data collection template and notes are as follows:

[FPS remedy data collection template](#)

[FPS remedy data collection notes for completion](#)

[Age discrimination remedy data collection - Guidance for administrators and FRAs – version 2 clean](#)

Additionally, we have previously provided an [age discrimination payroll overview workshop](#), which may also be useful to FRAs when trying to understand the payroll requirements for age discrimination remedy.

FRAs should have already started work with their administrators to identify all eligible members and consider any processes or additional resources that need to be put in place to identify the data required in good time for 1 October 2023 when the Police and Firefighters' Pension Schemes (Amendment) Regulations 2023 come into force.

ACTION: FRAs to ensure that the data collection template is completed and sent to administrators so that administrators and FRAs are prepared for the implementation of remedy from 1 October 2023.

FPS Contribution Bandings for 2023-24

The [contributions banding factsheet](#) which confirms the contribution rates that apply for 2023-24 as set out in the scheme regulations is now available and confirms that there are no changes to the relevant rates for 2023-24.

Matthews pre-work factsheet for FRAs

In [FPS Bulletin 55 – March 2022](#), we confirmed that a second retained firefighters' options exercise would take place. The regulations to implement the second options exercise in England are currently being drafted by the Home Office and will be consulted on before they are laid before Parliament. The Home Office has a

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maximum period of 18 months to draft, consult, and introduce the necessary secondary legislation.

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

Ahead of the legislation coming into force, FRAAs are advised to take steps to identify retained firefighters who were employed between the relevant dates. With thanks to Claire Neale and the Matthews Technical Working Group, a [Matthews pre-work for FRAAs factsheet](#) is now available which is designed to help FRAAs to identify the work which should be done before the Matthews legislation comes into force.

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: pension sharing, page 109, survivor's pensions, page 127 and transfers, page 133.

FPS England SAB updates

SAB meeting 23 January 2023

The Scheme Advisory Board (SAB) last met on 23 January 2023 and discussed the following areas:

- Temporary in the context of the FPS
- Retrospective correction of pensionable pay
- PDD engagement sessions to date
- Remedy timetabling
- Commutation in the FPS 1992 Scotland
- HMRC tax consultation

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Additionally, the SAB was pleased to invite Angela Bell and Lucy Stone from The Pension Regulator to the meeting to give an update on pension dashboards. Angela and Lucy [provided a comprehensive presentation](#) which included:

- Pensions dashboards - current challenges and opportunities
- How pensions dashboards will work
- Consultations and regulations
- Preparing for pensions dashboards
- Commonly asked questions
- Compliance and enforcement policy

Other News and Updates

Appointment to the Bluelight team

Following a successful recruitment campaign, we are delighted to announce that Tara Atkins has been appointed to the Bluelight Team in the role of Firefighters' Pensions Adviser (Communications) and will join the LGA on 20 March 2023.

Tara has over 23 years' public service pension experience, including the LGPS, Police, Teachers, NHS, and Firefighters' Pension Schemes. Tara commenced Local Government employment in July 1999 at West Sussex County Council, where she commenced in the Pensions Administration Team, working her way up to Team Leader until she moved into the County Council's Subject Matter Expert Role in 2012, when the Administration Team were outsourced to a third party.

Tara's role at the LGA is to provide support to FRAs and FPS practitioners and she will lead the development of national FPS communications.

DWP appoints new chair of MaPS

[The Department for Work and Pensions \(DWP\) has appointed Sara Weller CBE](#) as the new permanent Chair of the Money and Pensions Service (MaPS).

Since September 2022 Sara served as a non-executive board member. Sarah will formally take up the role of permanent Chair on 29 March 2023.

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DWP appoints Mary Starks to lead review of TPR

The [review of the Pensions Regulator](#) (TPR) will examine how it is performing its role and where it can improve, providing greater efficiency and value to taxpayers. The report into the review is due to be delivered in May 2023.

Pensions dashboards newsletter

Earlier this month, the Pensions Dashboards Programme (PDP) published its [February 2023 newsletter](#).

The newsletter contains articles on:

- new connection hub, providing useful resources and information to prepare for connection to the ecosystem
- pensions dashboards myth busting video, demystifying some of the topics around dashboards
- understanding the dashboards available point and how it is different from connecting to dashboards
- inviting PDP to an event such as a regional pension office meeting
- following PDP on Twitter and LinkedIn and signing up for newsletters

The Bereavement Benefits (Remedial) Order 2022

On 15 December 2022, the Department for Work and Pensions [re-laid the above order and published their response to last year's consultation](#).

The Order extends eligibility for Widowed Parent's Allowance (WPA) and the higher rate of Bereavement Support Payment (BSP). Eligibility now includes surviving cohabiting partners with dependent children, who were not in a legal union with the deceased on the date of death. It has retrospective effect back to the 30 August 2018.

Prior to the changes, only those who had been married to, or in a civil partnership with, their deceased partner would be eligible for WPA or BSP.

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Currently:

- WPA is up to £126.35 per week
- BSP is a one-off amount of up to £3,500 and 18 monthly payments of up to £350.

Eligible beneficiaries can claim back to 30 August 2018. The monetary value is clearly significant to those eligible.

ACTION: FRAs and administrators to share this information in communications with pensioners.

Tax rules for 2015 remedy laid

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

Following that consultation, on 6 February 2023, the [Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) Regulations 2023](#) were laid. They apply to relevant public service pension schemes in England, Wales and Scotland and come into force on 6 April 2023, but some provisions will have retrospective effect.

The regulations set out changes to how the pensions tax rules will apply to pension scheme administrators and members of public service pension schemes because of the 2015 remedy. The regulations 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.

Public Service Pension Indexation and Revaluation 2023

On 20 February 2023, HM Treasury (HMT) issued [written statement HCWS566](#) confirming the Public Service Pension Indexation and Revaluation for 2023.

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Public service pensions will be increased in line with the annual increase in the Consumer Prices Index up to September 2022. The statement confirms that the increase from 10 April 2023 is 10.1 per cent except for those public service pensions which have been in payment for less than a year, which will receive a pro-rata increase. The Pensions Increase (Review) Order is expected to be laid during March 2023; however, [the pensions increase multiplier tables](#) are available now.

The statement also confirms that the FPS 2015 will use the figure of 7 per cent for the earnings element of revaluation for active members to be applied at one second after midnight on 31 March 2023.

HMRC

[Pension schemes newsletter 146 and 147](#)

On 31 January 2023, HMRC published [pension schemes newsletter 146](#). It contains articles on relief at source, pension flexibility statistics, migrating to the Managing Pension Schemes service, accounting for tax (AFT) returns, and pension scheme transfers

ACTION for FRAs: Migrate to the Managing Pension Schemes service as soon as possible.

On 28 February 2023, HMRC published [pension schemes newsletter 147](#). It contains articles on relief at source, public service pensions remedy, and AFT returns.

Events

[FPS coffee mornings](#)

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

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

[14 February 2023 – Remedy pre-work special](#)

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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.

LGA/ National Police Chiefs' Council data conference – London – 17 May 2023 (save the date)

The LGA and NPCC are excited to announce that they will be holding a joint data conference on 17 May 2023 at 18 Smith Square, London. The conference will concentrate on understanding and controlling data and will include panel sessions and a data planning workshop. Example themes which will be explored are:

- Successful project implementation
- Engaging members
- Cost of the scheme
- Owning the narrative

The full programme and booking link will be available shortly.

FPS AGM – London – 19 to 20 September 2023 (save the date)

The Fire Pensions Annual Conference will take place from 19 to 20 September this year. The two-day programme will allow delegates to network with fellow colleagues and hear the latest news on the Firefighters' Pension Scheme from the scheme's key stakeholders.

The full programme and booking link will be available in due course.

Legislation

SI	Reference title
SI 2023/113	<u>Public Service Pension Schemes (Rectification of Unlawful Discrimination) (Tax) Regulations 2023</u>
SI 2023/134	<u>The Bereavement Benefits (Remedial) Order 2023</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](#)
- [LGA pensions website](#)
- [LGPS Regulations and Guidance](#)
- [LGPC Bulletins](#)
- [LGPS member site](#)
- [Scottish Public Pensions Agency - Firefighters](#)
- [Welsh Government Fire circulars](#)

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

FPS Bulletin 67 – March 2023

Welcome to issue 67 of the Firefighters’ Pensions Schemes bulletin.

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

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

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Calendar of events

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

Table 1: Calendar of events

Event	Date
FPS coffee morning	11 April 2023
Matthews Technical Working Group	11 April 2023
FPS Communications Working Group	14 April 2023
Data conference	17 May 2023
SAB	8 June 2023
SAB	14 September 2023
FPS AGM	19-20 September 2023
SAB	14 December 2023

Actions arising

[Consultation on the Firefighters' Pension Scheme \(Remediable Service\) Regulations](#)

[2023](#): All interested parties are encouraged to respond to the consultation by the deadline of 23 May 2023.

[Top up grant 2023 – Collection of pensions accounting data](#): FRAs to start preparing their pensions income/expenditure data in order to submit their returns by the Home Office deadline.

[Spring budget 2023](#): FRAs and administrators to share this information with the relevant parties within their organisation.

[DWP announces delays to dashboard connection deadlines](#): FRAs and administrators to make sure that relevant parties within their organisation are aware of the announcement and TPR's actions.

FPS

[Consultation on the Firefighters' Pension Schemes \(Remediable Service\) Regulations 2023](#)

On 28 February 2023, the Home Office published [a consultation on the Firefighters' Pension Schemes \(Remediable Service\) Regulations 2023](#). These regulations concentrate on the retrospective elements of the 2015 Remedy that are required to fully deliver the remedy. This includes establishing the deferred choice underpin (DCU) and the changes needed to offer pensioners and beneficiaries of deceased scheme members an immediate choice between legacy or reformed scheme benefits.

The LGA will respond to the consultation and share our response before the consultation closes on 23 May 2023.

ACTION: All interested parties are encouraged to respond to the consultation by 23 May 2023.

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Top up grant 2023 – Collection of pensions accounting data

On 2 March 2023, the Home Office sent an email to Claim Certifiers and Administrators to advise that FRAs should now be working towards submitting audited 2021/22 and unaudited 2022/23 pensions income/expenditure data as part of this year's top up grant claim. This year's pension accounting data will need to be submitted on the DELTA online data collection system. Notification will be sent via DELTA when the forms go live in the first week of April.

The Home Office has indicated that it will undertake additional internal checks on any financial data submitted. The additional internal checks involve an in-depth and formal check on the audited and unaudited pension income/expenditure data submitted by FRAs.

As part of this additional check, it will be requesting that all FRAs provide the following information:

- Electronic copies of the trial balances from their audited accounts where the pensions income/expenditure data was extracted; and
- Any post balance sheet adjustment events (showing audit adjustments).

The deadline for completing the returns will be mid-May. This should allow sufficient time for the claims to be scrutinised and approved.

It is important to note that the Department will only be able to make Top Up grant payments on any claims that it can validate as being correct and, as such, failure to provide the requested information, or the submission of incomplete information, will delay any grant payments due in July. It is therefore critical that the accounting data submitted on each FRA's claim form reconciles with trial balances that are submitted as supporting evidence.

The Home Office will be writing to FRAs to formally commission this data in April. However, it is essential that FRAs start making preparations now in order to be able to extract the correct data from their accounts and collate the supporting evidence for their claims.

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ACTION: FRAs to start preparing their pensions income/expenditure data in order to submit their returns by the Home Office deadline.

FPS annual update 2023

We confirmed in [FPS Bulletin 66 – February 2023](#) that FPS contribution rates remained unchanged for 2023-24.

All relevant thresholds and rate changes for 2023 are available in the [FPS annual update 2023](#).

All relevant legislation can be viewed on our website under annual update Statutory Instruments.

Website downtime

Please be aware that both the FPS Regulations and Guidance and the FPS Board websites will be unavailable on the morning of 19 April 2023 for an upgrade. As the existing page design template is no longer available in the new version of the website's content management system, users will notice that both sites have a new look following the upgrade.

Downtime will commence at five o'clock in the morning and it is anticipated that this will last for a few hours.

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: survivor benefits, page 130 and two-pensions, page 141.

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FPS England SAB updates

SAB meeting 23 March 2023

The Scheme Advisory Board (SAB) last met on 23 March 2023 and the meeting covered following areas:

- GAD update on the Matthews remedy
- Home Office retrospective remedy consultation
- First Actuarial Spring budget update for the SAB
- GAD update on the 2020 valuation

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

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

Other News and Updates

Farewell from Claire Hey

As readers may know, I am leaving the LGA on 23 April 2023 to take up a role with Heywood Pension Technologies.

It has been a pleasure and a privilege to work with so many committed stakeholders across the Fire sector during my six years with the LGA, and I feel humbled by the support and friendship extended to me during that time.

Following an extremely competitive recruitment process, I am delighted to announce that Claire Johnson has been appointed to the senior adviser role on a permanent basis. And that, as Claire is currently on maternity leave, Elena Johnson has been promoted on a temporary basis to lead the team.

This month I was also delighted to welcome Tara Atkins to the team to lead on

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communications – as reported in [FPS Bulletin 66](#).

I wish the team all the best for the future and know that they will provide exceptional support and guidance to the sector as we progress through the various challenges ahead.

Judgment on cost cap mechanism

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. The review took place from 31 January 2023 to 3 February 2023.

On 10 March 2023, [the High Court ruled](#) that HM Treasury’s decision to include the McCloud/ Sargeant remedy in the cost cap mechanism was not unlawful. The judge ruled in favour of HM Treasury on all grounds. The judge also refused permission to appeal, but the FBU and other parties are able to apply for permission to appeal directly to the Court of Appeal.

DWP supports expansion of auto enrolment

On 3 March 2023, [the Department for Work and Pensions \(DWP\) confirmed](#) it will support the private members bill expanding Auto Enrolment. [The Pensions \(Extension of Automatic Enrolment\) \(No.2\) Bill 2023](#) proposes to give the government powers to make regulations which:

- abolish the Lower Earnings Limit for contributions – currently £6,250, and
- reduce the age of auto enrolment for eligible jobholders – down from 22 to 18.

The government has not given a timetable for when the changes may take effect.

DWP announces delays to dashboard connection deadlines

On 2 March 2023, the government confirmed its intention to legislate to amend schemes’ connection deadlines. This follows a [written ministerial statement](#) issued by DWP announcing the delays. Delays are necessary to give the Pensions Dashboards Programme (PDP) the time it needs to meet the challenges in developing the digital architecture. DWP will provide an update on dashboards to Parliament before Summer 2023 recess.

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It is not clear if connection deadlines for public service pension schemes will change.

Following the announcement, The Pensions Regulator (TPR):

- will write to those schemes affected by the announcement to confirm when new deadlines are set – [example communication](#)
- has [published updated guidance and checklist](#), to help schemes focus on what they should be doing now to prepare for their dashboard duties
- will produce a ‘content toolkit’ with key messages for administering authorities to copy / paste / edit / include as appropriate in their communications
- held a free webinar on 30 March 2023 about ‘getting to grips with your data’

ACTION: FRAs and administrators to make sure that relevant parties within their organisation are aware of the announcement and TPR’s actions

Spring budget 2023

On 15 March 2023, the Chancellor of the Exchequer delivered his [Spring Budget 2023](#). See [HMRC’s newsletter 148](#) and [Policy paper](#) for more information.

The [Finance \(No.2\) Bill 2022/23](#) was published on 23 March 2023. With effect from 6 April 2023, the Bill proposes to enact some of the changes announced at the Spring budget. This includes:

- increasing the annual allowance from £40,000 to £60,000
- increasing the money purchase annual allowance from £4,000 to £10,000
- increasing the adjusted income level for the tapered annual allowance from £240,000 to £260,000
- increasing the minimum tapered annual allowance from £4,000 to £10,000
- abolishing lifetime allowance (LTA) charges arising in relation to benefit crystallisation events occurring on or after 6 April 2023

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- allowing members to accrue new pension benefits, join new arrangements or transfer, without losing enhanced protection or fixed protection where the protection was applied for before 15 March 2023
- changing the taxation of the LTA excess lump sum, so that it is taxed as pension income (taxable at marginal rate rather than 55 per cent)
- notwithstanding the LTA charge being abolished, ensuring that payments of (or any part of) serious ill-health lump sums, defined benefit lump sum death benefits or an uncrystallised funds lump sum death benefits that would have incurred an LTA charge remain taxable payments, with the excess taxed as pension income (taxable at marginal rate rather than 55 per cent).

Legislation will be introduced in a future Finance Bill to remove the lifetime allowance from pensions tax legislation.

The SAB's actuarial adviser, [First Actuarial has produced a bulletin](#) which also covers these changes.

ACTION: FRAs and administrators to share the above with the relevant parties within your organisation.

PDP issues March newsletter

In March 2023, PDP [published their March newsletter](#). The newsletter contains articles on:

- DWPs written ministerial statement on pensions dashboards connection times
- FAQs on connection deadlines and revised timeline
- pensions dashboards myth busting videos
- signing up for a new FAQ newsletter
- new PDP website homepage.

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[GAD publishes blog on pensions dashboards data matching](#)

GAD has published [a blog on the role of data matching](#) for pensions dashboards success. The blog looks at the questions administrators need to ask when deciding what data to use. It also emphasises the need for regular data quality reporting and cleansing. In the blog, GAD Pensions Consultant Taylor Brightwell-Smith noted the particular challenge public service pension schemes face with their data and said:

“Public service pension schemes have an added challenge that many other defined benefit schemes do not. They remain open to new members. This means that the data position will never be static. It will continue to ebb and flow. This poses a challenge to schemes when considering their future interactions with pensions dashboards. They will need to take stock of their data when considering the logic of their matching criteria. No one-size fits all.”

The blog continued:

“That’s the reasoning behind matching criteria not being prescribed in legislation. Schemes need to understand their own data challenges and cleanse as far as possible. This will lay the foundation for robust matching criteria to return results to dashboards quickly and accurately.”

Taylor Brightwell-Smith is due to be a panel member during the [Fire and Police Data Conference](#) on 17 May 2023.

[Police remedy consultation launched](#)

On 28 February 2023, [the Home Office published a consultation](#) to enact the second phase of the McCloud remedy for the Police Pension Scheme.

The consultation closes on 23 May 2023.

[The Pension Regulator publishes blog](#)

On 21 March 2023, Charles Counsell, the Chief Executive of TPR published [a blog](#) which covers delivering the best possible outcome for savers and the steps TPR is taking to become a data-led, digitally enabled organisation.

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SCAPE Discount Rate methodology consultation response

In [FPS Bulletin 46 – June 2021](#), we indicated that a public [consultation on the discount rate \(the “SCAPE rate”\) methodology](#) had been launched. The Superannuation Contributions Adjusted for Past Experience (SCAPE) discount rate is a discount rate used in the valuation of unfunded public service pension schemes to set employer contribution rates.

The consultation sought views on the appropriate methodology for setting the discount rate used in scheme valuations. The consultation closed on 19 August 2021.

On 30 March 2023, the UK Government [announced](#) the publication of its [response to the June 2021 consultation](#) on the methodology used to set the SCAPE discount rate and has concluded that the existing methodology best meets the balance of the Government’s objectives for the SCAPE discount rate, and therefore does not intend to modify the methodology.

The SCAPE discount rate to be used as part of the ongoing 2020 valuations will therefore be based on the expected long-term Gross Domestic Product growth figures, published by the Office for Budget Responsibility in July 2022. Based on these figures, the new SCAPE discount rate is CPI+1.7% p.a.

Administrators will recognise that usually where the SCAPE rate changes, CETV calculations are suspended until the factors can be amended in line with the new SCAPE rate. We understand that HMT will shortly suspend the [technical note](#) used for the SCAPE rate in calculating CETVs and we will notify you when this happens

HMRC

Pension schemes newsletter 148

On 16 March 2023, HMRC published [pension schemes newsletter 148](#). It contains articles on the Spring Budget 2023, net pay arrangements for low earners, accounting for tax returns and event reporting.

The newsletter also confirms where unfunded public service pension schemes

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operate final salary and CARE scheme as different arrangements, they will be treated as one arrangement when calculating the annual allowance.

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:

[14 March 2023 – Pensions dashboard preparations](#) (TPR)

[21 March 2023- Home Office retrospective remedy 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.

Fire and Police pensions data conference - 17 May 2023

We are pleased to invite readers to a data conference being held at 18 Smith Square, London on Wednesday 17 May 2023, from 10.00 to 15:30. This conference is being held jointly with the National Police Chiefs' Council (NPCC).

With McCloud remedy and pensions dashboards fast approaching, the conference will explore the following themes:

- successful project implementation
- member engagement
- costing the schemes
- owning the narrative

We have put together an agenda of industry speakers to reflect on why data is so

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important for the Firefighters and Police Pension Schemes and how technology can help us to get it right.

The event is aimed at Fire and Rescue Authorities and Police Authorities including scheme managers and Local Pension Board representatives, pension practitioners and administrators, along with software providers and industry professionals.

[Book your place now!](#)

Training and events - 2022/23 facts and figures

Between April 2022 and March 2023, we have delivered 20 local or regional training sessions for Local Pension Boards (LPBs) and scheme managers as follows:

Local Pension Board Training: Avon, Bedfordshire, Cheshire, Cumbria, Devon and Somerset, Durham and Darlington, East Sussex, Gloucestershire, Greater Manchester, Hampshire and IOW, Hertfordshire, Kent, Mid and West Wales, Northern Ireland, South Yorkshire, Staffordshire, West Midlands.

Scheme manager training: London Fire Commissioner, West Midlands, and West Sussex.

We have provided administrator updates to Hampshire County Council, WYPF, and XPS, as well as Scheme Advisory Board training for the SABs in England, Wales, and Northern Ireland.

Four meetings of the English SAB have taken place with eight additional SAB collaboration sessions on remedy with NPCC and the Home Office. We have attended 15 regional Fire Pension Officer Group meetings and have facilitated three communications group and three technical group meetings.

We were also pleased to hold our first in-person two-day AGM since the pandemic. Information about our events can be found on our [Events page](#).

Finally, we have been regular virtual visitors to the devolved SAB meetings to provide an overview of issues arising in England and continue to represent FPS interests at sector specific forums including HMT led meetings.

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Legislation

SI	Reference title
SI 2023/338	The Pensions Increase (Review) Order 2023
SI 2023/279	The LGPS (Amendment) Regulations 2023
SI 2023/270	The Guaranteed Minimum Pensions Increase Order 2023
SI 2023/252	The Public Service Pensions Revaluation Order 2023

Useful links

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

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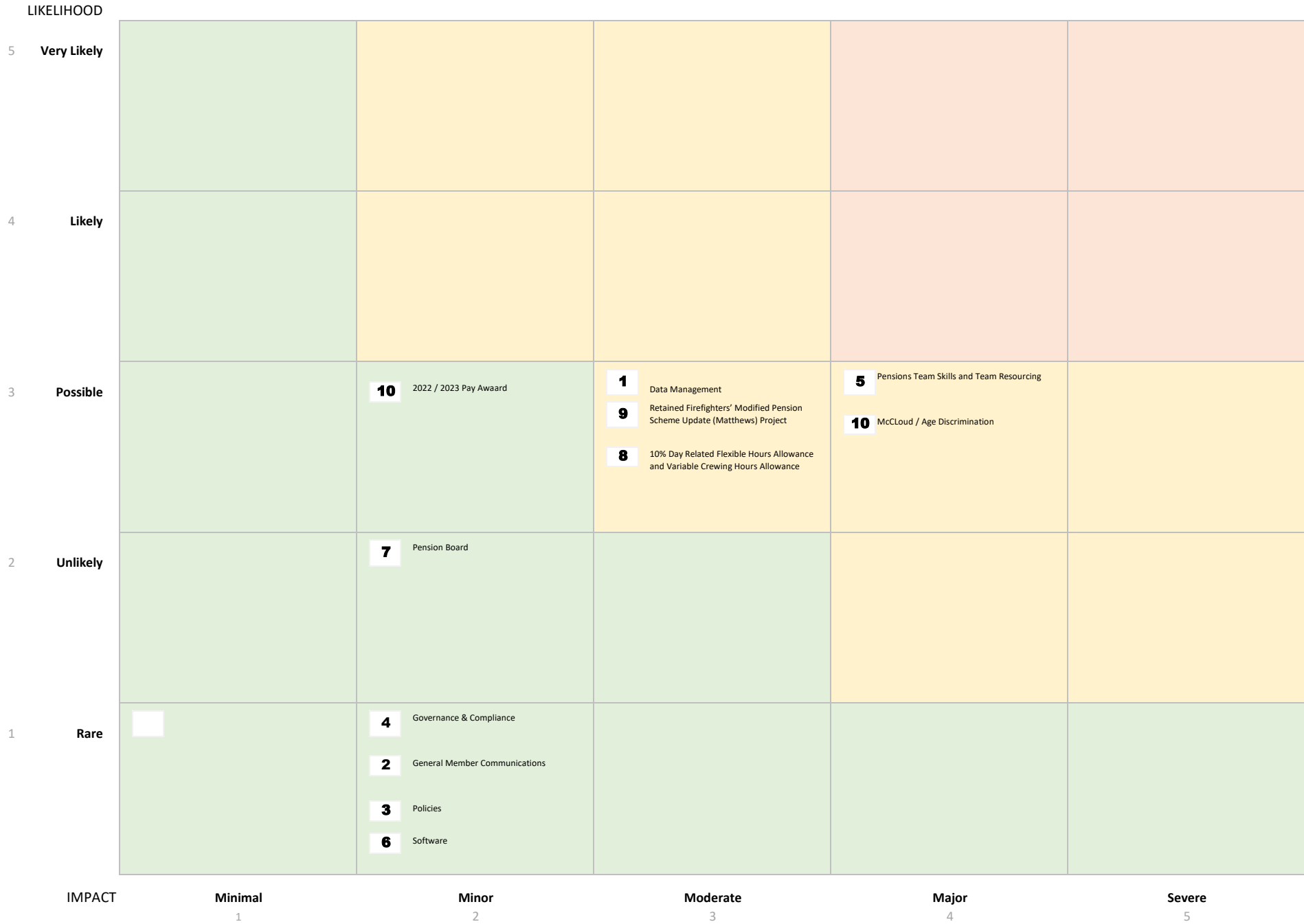
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While every attempt is made to ensure the accuracy of the bulletin, it would be helpful if readers could bring any perceived errors or omissions to the attention of the Bluelight team by emailing bluelightpensions@local.gov.uk.



Risk ID	Risk Title	Risk Owner	Risk with current mitigation controls in place		
			Likelihood (1-5)	Impact (1-5)	Overall Score
1	Data Management	Scheme Manager	2	3	6
2	General Member Communications	Senior Pensions Advisor / Pensions	1	2	2
3	Policies	LFPB Chair	1	2	2
4	Governance & Compliance	Scheme Manager	1	2	2
5	Pensions Team Skills and Team Resourcing	Scheme Manager	3	4	12
6	Software	Bus Ops	2	1	2
7	Pension Board	LFPB Chair	2	2	4
8	10% Day Related Flexible Hours Allowance and Variable Crewing Hours Allowance	Scheme Manager	3	3	9
9	Retained Firefighters' Modified Pension Scheme Update (Matthews) Project	Scheme Manager	3	3	9
10	McCloud / Age Discrimination	Scheme Manager	3	4	12
11	2022 / 2023 Pay Award	Scheme Manager	3	2	6
12					

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	Mar-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	Mar-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	Mar-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	Mar-23

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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	Mar-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	Mar-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	Mar-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	Mar-23
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	Mar-23

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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	Mar-23

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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 recommenced and it is hoped members from Priority group 2 onwards, will be contacted shortly.		Scheme Manager	Mar-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	Mar-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	Mar-23
			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	Mar-23	

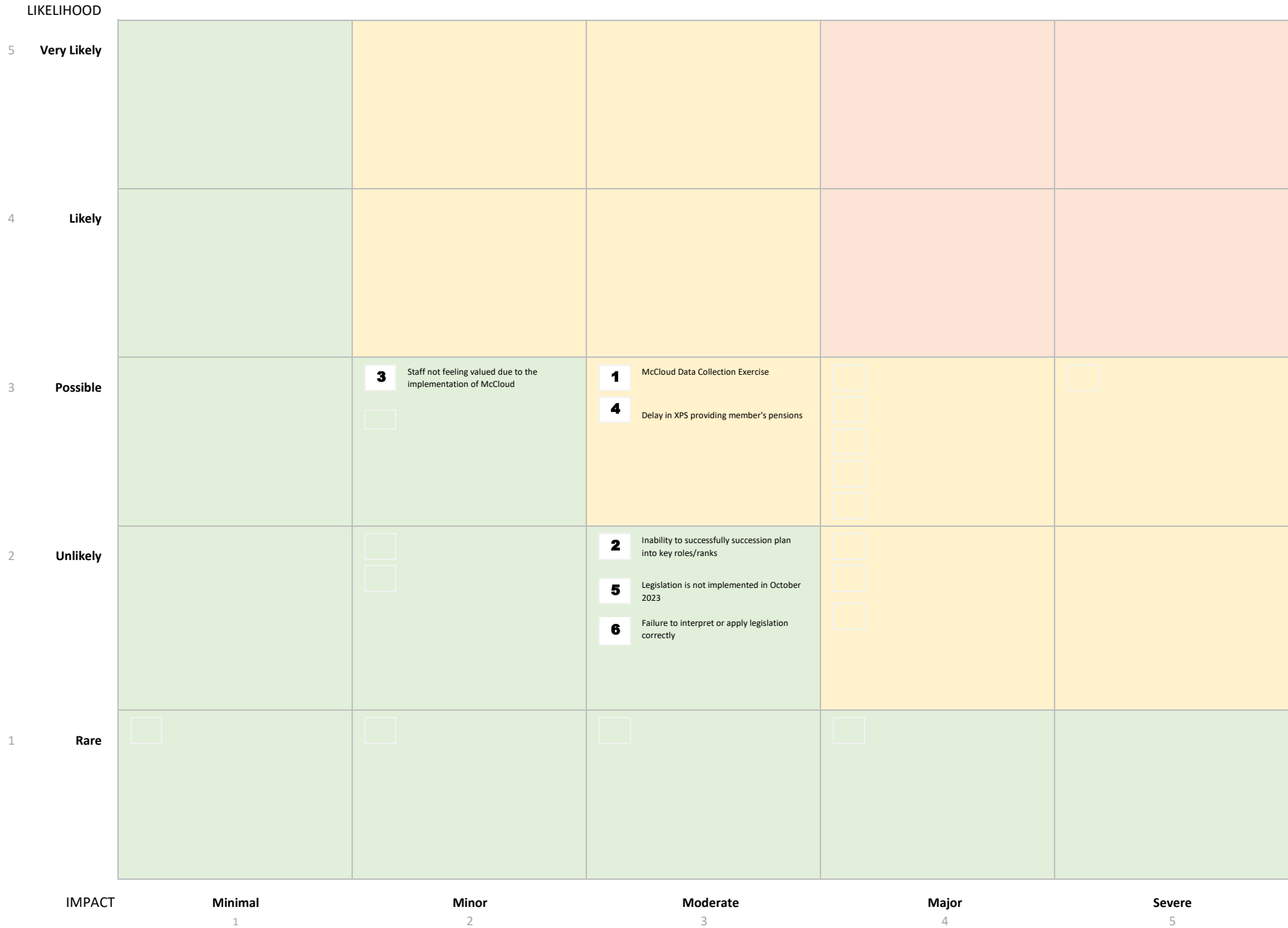
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			9C	F32	Communications have been sent to affected members to provide a further opportunity for those who did not respond to previous mailings to confirm if they want further information on the second option to join the modified scheme. However there have been no further updates from the Government as to when the scheme will reopen.	The lack of updates from the Government and action the pensions can take, may cause members further and prolonged frustrations.	Scheme Manager				TREAT/TOLERATE 1) Open and transparent communications are to be sent regularly to keep affected members up to date. 2) Update from the Government has been received in March 2022 as to when the second options exercise will open (October 2023). Calculations cannot be finalised as there are a number of standard assumptions which the Home Office need to confirm first. It is unknown as to when the standard assumptions will be completed and shared to FRA's.		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Mar-23
			9D	F35	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.	Member's frustrations may increase further as there is no work for SFRS to continue with until Q3 or Q4 of 2023.	Scheme Manager				TREAT: 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. 2) The team are also sending communications at appropriate intervals to ensure members are kept up to date and key messages remain transparent.		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Mar-23
			9E	F36	It is known at this stage of the financial costs to implement the Modified Scheme. - 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				TREAT: 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. 2) Calculations cannot be carried out until legislation has been implemented in September 2023.		Scheme Manager / Senior Pensions Advisor	Mar-23
10	McCloud / Age Discrimination		10A		Following the McCloud / Sargeant ruling, it was identified younger members of the 1992 pension scheme would face discrimination on the basis of their age due to the implementation of the 2015 pension scheme. Primary legislation has been put in place to move all members to the 2015 scheme. Secondary (remedial) legislation is due to come into effect in October 2023.	Members are feeling frustrated for the delay in receiving their 1992 benefits. Further delays are to be expected as the member has to wait for their Remedial Service Statement to be sent in due course.	Scheme Manager	3	4	12	TREAT: 1) The Pensions Team are liaising with the LGA, XPS and the Fire Sector to understand the legislation and how it is to be implemented. 2) The Pensions Team are sending regular communications to members of the Service on the McCloud project. A new page has also been created on the pensions SharePoint page. 3) The team are responding to all actions which are expected of the Service such as working through the data collection exercise and responding to the consultation.	1) A dedicated risk register for the McCloud project has been created to horizon scan forthcoming risks associated with this project.	Scheme Manager / Senior Pensions Advisor	Mar-23
11	2022 / 2023 Pay Award		11A		On 7 March 2023, it was agreed operational staff would receive a pay increase. The increase included a 7% pay rise backdated to July 2022 and a further 5% implemented from July 2023. The increase in pay will only be paid in the 2023 / 2024 financial year.	Due to when the award will be paid, this may cause an Annual Allowance charge for some members. Additionally, some members will pay a higher level of tax due to two pay awards being paid in the same tax year.	Scheme Manager	3	2	6	TREAT: 1) Further information on managing any annual allowance charges is anticipated from the LGA. 2) The annual allowance threshold has increased from the tax year 2023/2024 which may reduce some members from paying annual allowance charges.		Scheme Manager / Senior Pensions Advisor	Mar-23

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- The impact statements are shown below as a guide as to what might constitute, for example, a minor impact.
- Please contact the Risk Manager if you require further support.

LIKELIHOOD		
Level	Likelihood	Odds
1	Rare	<10%
2	Unlikely	10% to 30%
3	Possible	30% to 70%
4	Likely	70% to 90%
5	Very Likely	>90%

IMPACT					
Level	Impact	Financial (revenue)	Residents	Reputational	Performance
1	Minimal	<£100k	Minimal impact on a small proportion of the population	Has no negative impact on reputation and no media interest	Minimal impact on achievement of one or more SCC priority objectives
2	Minor	£100K to £1m	Minor impact on a small proportion of the population	Minor damages in a limited area. May have localised, low level negative impact on reputation and generates low level of complaints	Minor impact on achievement of one or more SCC priority objectives
3	Moderate	£1m-£2.5m	Moderate impact on a large (or particularly vulnerable group) proportion of the population	Moderate damages but widespread. Significant localised low level negative impact on the organisations reputation which generates limited complaints.	Moderate impact on achievement of one or more SCC priority objectives
4	Major	>£2.5m to £10m	Major impact on a large (or particularly vulnerable group) proportion of population	Major damage to the reputation of the organisation. Generates significant number of complaints and likely loss of public confidence. Unwanted local or possibly national media attention.	Major impact on achievement of one or more SCC priority objectives
5	Severe	>£10m	Serious long term impact on a large (or particularly vulnerable group) proportion of population	Serious damage to the reputation of the organisation. Large number of complaints. National media coverage. Possible government intervention.	Serious long term impact on achievement of one or more SCC priority objectives



Risk ID	Risk Title	Risk Owner	Risk with current mitigation controls in place		
			Likelihood (1-5)	Impact (1-5)	Overall Score
1	McCloud Data Collection Exercise	Scheme Manag	3	3	9
3	Staff not feeling valued due to the implementation of McCloud and when pension payments will be made.	Scheme Manag	3	2	6
2	Inability to successfully succession plan into key roles/ranks across the Service could result in degradation of some activities/Services.	Scheme Manag	2	3	6
4	Delay in XPS providing member's pensions	Scheme Manag	3	3	9
5	Legislation is not implemented in October 2023	Scheme Manag	2	3	6
6	Failure to interpret or apply legislation correctly	Scheme Manag	2	3	6

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1	McCloud Data Collection Exercise	Pensions will not be paid on time when the legislation comes into effect.		Time taken to go through members' records and complete the spreadsheet. Team capacity to complete the task. Payroll system is not able to create the required report. Limitation of specialist resource to transpose / translate the data. Unit 4 going live in June 2023, may impact on the access to data required for McCloud once the legislation comes into effect.	Data collection exercise is not completed ahead of the legislation coming into effect.	Scheme Manager	3	3	9	Bank contract staff are in place who hold the specialist knowledge to complete the exercise. Knowledge transfer is taking place for Pensions Team staff to all assist with the data collection exercise. Discussions are underway with teams in SCC to ensure the implementation of Unit 4 does not impact the project. Pensions Project Assistant has been recruited and is working on the data collection exercise. Regular meetings are taking place with XPS on a monthly basis.	A business case is being considered to ensure data remains available after Unit 4 is live.	Senior Pensions Advisor	May-23
2	Inability to successfully succession plan into key roles/ranks across the Service could result in degradation of some activities/Services.	High level of retirements in Q3 2023		October 2023 legislation date may mean members want to retire later on their 'correct pension.	Higher than usual number of members could leave the Service at the same time in or around October 2023. XPS will be unable to process members' pensions on time.	Scheme Manager	2	3	6	Regular updates are being submitted to the Pensions Team detailing those who can retire. SharePoint is updated regularly to provide member updates. A collaboration is taking place with Workforce Planning to ensure communications remain consistent. Continuous monitoring of retirees to monitor leavers against predictions. Create and share communication plan.		Pensions Project Officer	May-23
3	Staff not feeling valued due to the implementation of McCloud and when pension payments will be made.	Member expectations not being met.		Lack of clarity as to how contributions will be obtained and subsequent pension paid. The impact of other pension projects (10% and modified/Matthews) onto the member.	Members may need to wait longer before their pension is increased. Members may not have the money available to pay the contributions required at once. Due to the number of members in Surrey, it may take longer for XPS to complete the work compared to other services with fewer numbers. This may mean members will hear of firefighters at other Services who are obtaining their RSS sooner and are seen as 'being treated better'.	Scheme Manager	3	2	6	Pensions Team are communicating to members via different channels with the aim to avoid misunderstanding.		Pensions Project Officer	May-23
4	Delay in XPS providing member's pensions	Pension payments		Increase in members wishing to retire once the new legislation is in effect.	Members are unhappy with the Service received and may raise an IDRP.	Scheme Manager	3	3	9	XPS have been informed of members who are due to leave in October which the Service are aware of. XPS are aware that some members may delay their retirement date due to the legislation implementation date. XPS have recently completed an aggressive recruitment drive in order to prepare for the legislation and meet their KPIs. XPS are working with Heywood to aim for the software to be ready for October 2023. Pensions Team provide regular communications to active members. Continue planned meetings with XPS on the McCloud project.	KPI's are due to be updated by XPS to reflect the new legislation.	Senior Pensions Advisor	May-23

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5	Legislation is not implemented in October 2023	Pension payments		Government is unable to implement legislation to specified deadline.	Member's will be dissatisfied with the delay incurred until they are contacted with their Remedial Service Statements (RSS).	Scheme Manager	2	3	6	Pensions Team are communicating to members via different channels with the aim to avoid misunderstanding and manage expectations.		Senior Pensions Advisor	May-23
6	Failure to interpret or apply legislation correctly	Member expectations not being met.		Incorrectly processing the McCloud remedy not in line with legislation and/or Home Office expectations	Active members may have delayed retirements and pensioner may have a delayed remedy of pension benefits. May result in calculations being conducted incorrectly thus paying members incorrect benefits.	Scheme Manager	2	3	6	Pensions Team are liaising with the LGA, XPS and the Fire Sector to understand the legislation and how it is to be implemented.	The Home Office are designing a calculator for all Fire Services to use to ensure a consistent approach is taken when members' pension benefits are being calculated. Calculations will be carried out by XPS, not in-house at the Fire Service.	Senior Pensions Advisor	May-23

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