

Notice of Meeting

Surrey Local Firefighters' Pension Board



Date and Time

Thursday, 20 July
2023
10.30 am

Place

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


Contact

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Board Members:

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

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AGENDA

1 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

2 MINUTES FROM THE PREVIOUS MEETING: 10 NOVEMBER 2022 & 24 FEBRUARY 2023 & 27 APRIL 2023 (Pages 5 - 24)

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 (14 June 2023).
2. The deadline for public questions is seven days before the meeting (13 June 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 25 - 34)

The Board to note the Action and Recommendation Tracker.

6 SCHEME MANAGEMENT UPDATE REPORT (Pages 35 - 40)

The Board has requested an update on Scheme management activities.

7 XPS - SURREY FIRE & RESCUE AUTHORITY PENSION BOARD REPORT (Pages 41 - 52)

To note the XPS – Surrey Fire and Rescue Authority Pension Board report.

8 FIRE BULLETINS (Pages 53 - 110)

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 111 - 138)

To note the risk registers.

10 DATE OF THE NEXT MEETING

The next meeting will be on 23 November 2023.

Joanna Killian
Chief Executive
Published: 12 July 2023

MOBILE TECHNOLOGY AND FILMING – ACCEPTABLE USE

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Thank you for your co-operation.

QUESTIONS AND PETITIONS

Cabinet and most committees will consider questions by elected Surrey County Council Members and questions and petitions from members of the public who are electors in the Surrey County Council area.

Please note the following regarding questions from the public:

1. Members of the public can submit one written question to a meeting by the deadline stated in the agenda. Questions should relate to general policy and not to detail. Questions are asked and answered in public and cannot relate to “confidential” or “exempt” matters (for example, personal or financial details of an individual); for further advice please contact the committee manager listed on the front page of an agenda.
2. The number of public questions which can be asked at a meeting may not exceed six. Questions which are received after the first six will be held over to the following meeting or dealt with in writing at the Chairman’s discretion.
3. Questions will be taken in the order in which they are received.
4. Questions will be asked and answered without discussion. The Chairman or Cabinet members may decline to answer a question, provide a written reply or nominate another Member to answer the question.
5. Following the initial reply, one supplementary question may be asked by the questioner. The Chairman or Cabinet members may decline to answer a supplementary question.

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 Manager
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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MINUTES of the meeting of the **SURREY LOCAL FIREFIGHTERS' PENSION BOARD** held at 10.30 am on 27 April 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, 20 July 2023.

(* present)

Elected Members:

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

In attendance

Benedict Mulliss, substitute member, virtual

11/23 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 were received from Glyn Parry-Jones and Paul Bowyer.

12/23 MINUTES FROM THE PREVIOUS MEETING: 10 NOVEMBER 2022 & 24 FEBRUARY 2023 [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

13/23 DECLARATIONS OF INTEREST [Item 3]

None.

14/23 QUESTIONS AND PETITIONS [Item 4]

There were none.

15/23 SURREY FIREFIGHTERS' PENSION BOARD ACTION AND RECOMMENDATION TRACKER [Item 5]

Witnesses:

Sally Wilson, Scheme Manger
Carrie Pearce, Pensions Project Officer

Key points raised during the discussion:

1. The Chairman introduced the Action and Recommendation Tracker.
No comments were raised.

Actions/ further information to be provided:

None.

Resolved:

The Board noted the Actions and Recommendations Tracker.

16/23 SCHEME MANAGEMENT UPDATE REPORT [Item 6]

Witnesses:

Sally Wilson, Scheme Manger
Carrie Pearce, Pensions Project Officer

Key points raised during the discussion:

1. The Scheme Manager introduced the report and highlighted detail related to:
 - a. McCloud Age Discrimination
 - b. the McCloud consultation where Members noted that a meeting to review the consultation response was scheduled for 16 May 2023
 - c. 10% Pensionable Allowance
 - d. updates related to the modified scheme
 - e. details related to the spring budget
 - f. details related to the pay award
 - g. the next auto enrolment date in 2025
 - h. that Richard Scarth was recently appointed as a substitute member of the board
 - i. details related to recent training from the LGA.
2. In regard to communications, the Chairman said that the Board would welcome any feedback on communications from the employee representatives.

Actions/ further information to be provided:

None.

Resolved:

The Board noted the report.

17/23 XPS - SURREY FIRE & RESCUE AUTHORITY PENSION BOARD REPORT [Item 7]

Witnesses:

Paul Mudd, XPS
Sally Wilson, Scheme Manger
Carrie Pearce, Pensions Project Officer

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. XPS would be holding an online 'open day' focused on details related to McCloud. It was further noted that XPS would also provide their own response to the McCloud consultation.
 - b. Details related to additional work / previous minutes as outlined in the report.
 - c. An overview of the Member Self-Service Data as outlined in the report.
 - d. An overview of the common data as outlined in the report.
 - e. An update on membership.
 - f. An overview of completed cases where it was noted that completed cases were at 94% for the quarter. Details were also noted related to task analysis as included within the report.
 - g. Noted that no complaints had been received.
2. In regard to the Year-end Data Templates, the Chairman asked whether officers were aware of any reason why the upcoming deadline would not be met. The Pensions Project Officer stated that a delay was likely and that she was in touch with the payroll team to find out more information on when the information was going to be available.
3. In regard to the tracing service, and the one member who exceeded normal pension age for a deferred beneficiary who was overseas, the Chairman asked that XPS make their best efforts to contact the member.
4. In regard to completed cases, as substitute member of the Board, Benedict Mulliss, asked for more details on the cases not completed on schedule and the extent of the delay. The representative from XPS stated that he did not have the information to hand on the extent of the delay however he would seek to include the information in future reports. The representative added that the number of days for each delay was usually low.
5. In regard to estimate cases, the Vice-Chairman said that there was a trend emerging from January to March which showed that cases were not being delivered to target. The Vice-Chairman asked whether XPS could provide detail on the reasons for not meeting the target. The representative stated that additional training had been delivered to members of the team on estimates in order to improve performance. The representative added that, when there are spikes in workload, the team prioritised work related to pension payments to ensure they were delivered on time. Following a discussion, the Chairman requested that XPS provide detail on the longest failure to meeting an estimate target at the next meeting.

Actions/ further information to be provided:

A5/23 - XPS to provide detail on the longest failure to meet an estimate target at the next meeting.

Resolved:

The Board noted the report.

18/23 FIRE BULLETINS [Item 8]

Key points raised during the discussion:

1. The Board noted the fire bulletins.

Actions/ further information to be provided:

None.

Resolved:

The Board noted the fire bulletins.

19/23 RISK REGISTERS [Item 9]

Witnesses:

Paul Mudd, XPS

Sally Wilson, Scheme Manger

Carrie Pearce, Pensions Project Officer

Key points raised during the discussion:

1. The Scheme Manager introduced the report and highlighted the risk summary included in the report. Members noted that the highest risks which were related to:
 - a. 10% Day Related Flexible Hours Allowance and Variable Crewing Hours Allowance
 - b. Retained Firefighters' Modified Pension Scheme Update (Matthews) Project
 - c. McCloud / Age Discrimination
 - d. Pensions Team Skills and Team Resourcing.
2. In regard to Pensions Team Skills and Team Resourcing, officers confirmed that resources had been increased within the team and that training was underway.
3. In regard to the McCloud Risk Summary, Members noted the six identified risks which were:
 - a. McCloud Data Collection Exercise
 - b. staff not feeling valued due to the implementation of McCloud and when pension payments will be made
 - c. inability to successfully succession plan into key roles/ranks across the Service could result in degradation of some activities/Services
 - d. delay in XPS providing member's pensions
 - e. legislation is not implemented in October 2023
 - f. the failure to interpret or apply legislation correctly.
4. In regard to the Data Collection Exercise, the Pensions Project Officer stated that they were reassured that officers could utilise the resource within the team to complete the exercise as the largest of the two returns for the 1992 scheme been completed and submitted to XPS. Officers had also spoken with XPS to understand the position of other FRA's when completing the exercise.
5. In regard to the risk related to a delay in XPS providing member's pensions, the Pensions Project Officer stated that challenges included being reliant on the software being available on time and whether the

current 10 day key performance indicator was achievable. Members noted that officers were communicating with members who were considering retirement in October to management their expectations and offer advice. Information had been included on the pension SharePoint to provide detail to members on what it would look like if they were to retire before the 1 October.

6. The Vice-Chairman said that it was important to share intelligence related to workforce retirements with the Workforce Working Group to inform future workforce planning.
7. The Board noted that the pension payments legislation was expected in Summer 2023.
8. The Chairman requested that the next XPS report in July 2023 include detail on the pension payments legislation and whether preparations were expected to be ready in time for the implementation of the pension payment legislation in October 2023.
9. The Vice-Chairman said that officers should consider whether low scored risks should continue to be included on the risk register and when they could transition to being 'business as usual' risks.

Actions/ further information to be provided:

A6/23 - Members to be provided with detail within the next XPS report on the pension payments legislation and whether preparations were expected to be ready in time for the scheduled implementation in October 2023.

Resolved:

The Board noted the risk register.

20/23 DATE OF THE NEXT MEETING [Item 10]

The Board noted that the date of the next meeting was 20 July 2023.

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>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 members, the LGA have notified the Service that due to the changes in legislation, it is likely the new version of the Eol will need to be sent out to all members regardless of whether they have confirmed they would like to be considered as part of the Matthews project or not. The template will be provided in due course.</p> <p>February 2023: The data collection exercise was completed and submitted by 25 November 2022. No further updates have been received from the LGA or Home Office on this project.</p>	Ongoing

Item 5

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				<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>July 2023: A communication was sent to all affected members on 24 May 2023, advising further updates will follow once legislation confirmed. A poster, to inform members who believe they are eligible for the exercise but have not heard from the Pensions Team, are encouraged to make contact accordingly, was sent to all Station Commanders to display on Station Boards.</p>	
<p>30 April 2020 A16/20 & A1/22 (combined)</p> <p>13 January 2022 A1/22</p>	<p>10% Project 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>Regarding the 10% pensionable pay, the Scheme Manager agreed to circulate details on the communication timeline for each</p>	<p>Scheme Manager</p>	<p>July 2022: A meeting has taken place with the FBU and a follow up email was received which contained their points to ensure the project benefitted those affected. Follow up advice from Weightmans is required to confirm how the Service will respond to the FBU. The communications with the FBU are still underway. Therefore, the timeline has not been updated since January 2022.</p> <p>A communication was sent to all members to notify them of the current status of the project.</p> <p>November 2022: Extensive legal advice has been sought and the Service's stance has been communicated to the FBU. No feedback has been provided to the Service in response to our communication. Therefore, the project will recommence and Priority Group 1 members who have not responded</p>	<p>Ongoing</p>

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
		priority group to members of the Board.		<p>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. Members of all remaining Priority Groups were sent a communication on 13 April 2023.</p> <p>July 2023: All applicable members of Priority Group Three have now been paid their pension arrears and their pension benefits have been updated. Priority Group Four members will be contacted once the McCloud data collection exercise has been completed.</p>	

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
<p>30 April 2020</p> <p>A20/20</p> <p>(Informal meeting due to Covid-19)</p>	<p>GMP Exercise Administration Update (1 January 2020 - 31 March 2020)</p>	<p>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.</p>	<p>Scheme Manager</p>	<p>XPS have been working through the data needed required by Mercer to carry out the next step of the GMP exercise. Mercer provided a template to XPS which will assist with the rectification element of the project.</p> <p>November 2022: XPS were due to provide data extracts to the Service by the end of September 2022 which in turn would be provided to Mercer. XPS have not been able to finalise this piece of work and the Service are waiting for further information for an expected completion date.</p> <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> <p>July 2023: XPS have explained that they do not feel it is their responsibility to check the benefit specification template. The Service have contacted their legal party to determine if Weightmans may be able to carry out this exercise. It is still hoped the project will be completed before the end of 2023.</p>	<p>Ongoing</p>

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>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 several addresses returned. The team at XPS are working through the returns and a verbal update will be provided at the Board meeting.</p> <p>July 2023: XPS have confirmed that this project is continuing with their provider. A revised file is due to be submitted in June. Mortality screening costs are also being considered.</p>	Ongoing
28 July 2022 A7/22	Member Email Address Update	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	Scheme Manager	November 2022: The Pensions Project Team will shortly be assessing the feasibility of this. The Board is asked to note this will be an extensive task as the current database systems within the Service do not necessarily contain personal email addresses.	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
	XPS – Surrey Fire & Rescue Pension Board Report	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.		<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 and July 2023: No update on this area due to the other tasks within the team which have taken priority.</p>	
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	<p>February 2023: Update to be provided at the Local Pension Board Meeting</p> <p>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.</p> <p>July 2023: No further complaints have been logged up to July 2023. XPS to provide a verbal report at the meeting of the complaint list sent to them in May 2023.</p>	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	<p>April 2023: XPS will provide a verbal update at the Local Pension Board meeting.</p> <p>July 2023: An update was not provided at the previous meeting. XPS to provide a verbal update at the meeting.</p>	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
10 November 2023 A12/22	Risk Register	The board to consider one or two risks, and mitigating actions in place, in detail at each meeting	Scheme Manager	February 2023: due to the implementation of the new risk register format, the Board will consider two actions in detail at the April 2023 meeting. July 2023: This is an ongoing item on the agenda now. The Pension Team suggest to the chair that one or two risks are discussed at each meeting going forward.	closed
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. July 2023: An update has been provided from Department of Work and Pensions confirming the revised timeline for Pension Dashboards. The new staging date for FRAs will be 31 October 2026	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. July 2023: Verbal response to be provided by XPS at the meeting.	Ongoing
27 April 2023 A5/23	XPS – Surrey Fire & Rescue Pension Board Report	XPS to provide detail on the longest failure to meet an estimate target at the next meeting.	XPS / Scheme Manager	July 2023: XPS to provide a verbal update in the meeting.	Ongoing
27 April 2023 A6/23	Risk Register	SFRS to be provided with an update on the McCloud Age discrimination legislation and whether preparations were expected to be ready in time for	XPS / Scheme Manager	July 2023: A meeting took place between the Pension Team and XPS on 21 June 2023. Currently, there are no expected impacts to members or anticipated delays with the preparations for implementation of the legislation in October 2023.	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
		the scheduled implementation in October 2023.			
6 July 2023 A7/23	Scheme Manager Report	SFRS to provide the year-end data for the 2022 – 2023 financial year to XPS in order to send out annual Benefit statements by 31 August 2023 and to ensure member records and projections are correct.	Scheme Manager	July 2023: Due to annual leave, the introduction of the new payroll system, the month the pay award was paid to SFRS staff and how the data needs to be extracted from SAP, the deadline of 15 May 2023 to send the data to XPS was not achieved. The Pensions Team has been informed the data is likely to be ready by 31 July. XPS have been notified of this and has received confirmation this should not impact the creation of annual benefit statements.	Ongoing

COMPLETED RECOMMENDATIONS/REFERRALS/ACTIONS – TO BE DELETED

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	<p>April 2023: An update on this topic has been provided in the Scheme Manager report.</p> <p>July 2023: The Pension Team suggest this action is now closed as completed. The member has been advised of the next automatic enrolment date and confirmation has been obtained from the payroll team at SCC that the next automatic enrolment date will be May 2025.</p>	Completed

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> <p>Jul 2023: The Pension Team suggest this action is now closed and a new action opened when the responses to the TPR survey are released and a subsequent ‘six processes’ factsheet is provided.</p>	Closed
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	<p>April 2023: An update on the meeting on this topic has been provided in the Scheme Manager report.</p> <p>July 2023: Historic data will be available following the transfer to Unit 4. The Pension Team suggest this action can be closed.</p>	Closed



Surrey Local Firefighters' Pension Board 20 July 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 Remedy

2.1 The Subject Matter Experts (SMEs) within the Pensions Team continue to work on the data collection exercise. The wider team have also been assisting with the exercise.

2.2 The first data return, for members of the 1992 scheme, was submitted to XPS administration on 14 April 2023. The data return for members of the 2006 scheme was due to be completed by the end of June 2023. Although the team have been working tirelessly on this project, the deadline will need to be extended to 31 July 2023 as it is taking longer than anticipated to extract and check the relevant member data.

2.3 The Pensions Team submitted a response to the McCloud consultation ahead of the deadline of 23 May 2023. The Local Government Association (LGA) also responded to the consultation, a copy of which is available on the consultation page of the FPS website.

2.4 A letter has been sent to all members affected by McCloud. This includes those who have retired and those not yet at retirement age. The communication informed members who have not yet retired, that they will receive details of their pension benefit choices by 1 April 2025 via a Remedial Service Statement (RSS) – i.e. within 18 months of the effective date of the legislation. For members who have retired, pension benefits will not be increased (where applicable), immediately when the legislation comes into force. Pension benefits will only be increased once members' RSS's are sent and the relevant contributions have been paid.

10% Pensionable Allowance

2.4 XPS were sent the updated information for members in Priority Group Three who are due an increase to their pension benefits and payment of pension arrears. Member records have now been updated and their pension payments were increased and paid at the end of June 2023.

2.5 The Pensions Team's immediate priority focuses on completing the McCloud data collection exercise before re-commencing with the 10% project. A communication to update members of Priority Groups Four to Seven was sent in April 2023. The letter informed members affected by the project, that their personalised calculations will be sent to them by the end of 2023. Once the data collection exercise has been completed, members of Priority Group Four will be contacted.

Matthews - Retained Scheme – On-Call Access

2.6 The Pensions Team have submitted their response to the Home Office's consultation ahead of the deadline of 9 June 2023.

2.7 A communication was sent to eligible members. One version of the communication was sent to those who returned an Expression of Interest (EoI) form to confirm they would like to receive further details regarding the retained pension scheme. The communication confirmed further information will follow once the legislation is in place. The second version of the letter was sent to those who has not returned their EoI form in 2021 or had responded that they were not interested in being considered for the exercise. The communication confirmed the Service would contact the cohort once the legislation was implemented as the change in eligibility criteria and how far back their pensionable service can go, may mean they would like to be registered to the Modified Pension Scheme.

2.8 The Pensions Team produced a poster to raise awareness of the Matthews Retained Second Options legislation with the action for members who believe they are eligible for the exercise to contact the Pensions Team if they have not received communications already. The poster was sent to all SFRS Station Commanders to display the posters on the station boards.

2.9 A risk register has been completed which is specific to the Matthews Retained scheme project. This risk register forms part of the Board documents pack and is available for Board members to review. The top two risk identified from the review are:

- Uncertainty of interaction between Matthews and McCloud legislation. Risk number 1.
- Ambiguity of consultation document surrounding different cohorts of member. Risk number 4.

Pension Policies

2.10 The abatement policy has now been completed and approved by the Workforce Working Group (WWG) and is available to view on the Pensions SharePoint site.

Pay Award

2.11 The backdated pay award consists of a 7% increase backdated to July 2022 and a further 5% increase from 1 July 2023. The Pensions Team submitted the pay award details, to XPS, for affected pensions, transfers, and deferred members at the end of May 2023. XPS confirmed on 20 June 2023 that pensioner benefits were increased based on the backdated pay award and will be implemented in the June pay run. There are two members outstanding due to queries which need to be resolved. Their pensions will be increased in July and the Service are in contact with the affected members.

2.12 Pay award details for active members are due to be sent to XPS with the annual end of year membership data. The information has not yet been submitted to XPS to update member details based on pay reporting issues. As a result, member projections do not show the backdated pay award. Members of the firefighter pension scheme have contacted the Pensions Team asking when the pay award data will be included. A communication to confirm when the pay award data will be included in projections will be sent to members once the Pensions Team have received the pay award data.

2.13 Further advice is still anticipated from the LGA with regards to possible impact of the backdated pay award on members tax liabilities and annual allowance calculations.

Guaranteed Minimum Pension (GMP) Reconciliation

2.14 The reconciliation project is due to be completed by the end of 2023. For the next phase of the project Mercer have asked if the benefit specification can be signed off by the Service/XPS to use for the calculations Mercer will be undertaking. XPS have explained that they do not feel it is their responsibility to check the benefit specification template. The Pensions Team have contacted their legal adviser to determine if Weightmans may be able to review the benefit specification template.

Pension Dashboard

2.15 The Pensions Team were notified on 9 June 2023 by the LGA that the Department for Work and Pensions (DWP) had laid the Pensions Dashboard (Amendment) Regulations 2023. The amending regulations include a connection deadline of 31 October 2026. Further guidance is required from the DWP to confirm this staging date applies to all schemes with 100 or more relevant members at the scheme year end between 1 April 2023 and 31 March 2024, or if there will be a later staging date for FRAs.

XPS/FRA Meeting

2.16 On 25 May 2023 a meeting was hosted by XPS Administration to discuss the preparations and challenges faced by fire authorities with regards to implementation of the McCloud Age Discrimination legislation. The meeting was attended in person and on-line by pension team representatives from Cheshire, Cleveland and Surrey Fire and Rescue fire authorities, as well as the Local Government Association (LGA). This meeting provided a forum for discussion of the perceived difficulties and challenges presented by the legislation. Discussions included data collection difficulties, benefit calculation challenges, and the importance of communicating with members to manage expectations. The LGA confirmed they have commissioned their communications team to prepare a member video to include time scales associated with the 18-month McCloud timetable. It was suggested that this will be distributed via the LGA website. It was also suggested that the Fire Authorities share their communications with each other, to establish a consistent approach.

Communications

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

- **McCloud Update:** On 17 May 2023, a communication was sent to all affected members of what to expect once the McCloud legislation is implemented in October 2023.
- **Matthews Update:** On 24 May 2023, a communication was sent to all members confirming their eligibility for the Second Options exercise and advising further updates will follow once the legislation is in force.
- **Matthews Retained Poster:** On 31 May 2023, a poster to raise awareness of the Second Options exercise was sent to all Surrey Station Commanders for display on station boards. A supplementary email was also sent to Station Commanders to provide background to the Matthews Retained project and the action required for members as stated on the poster.
- **Reminder of SFRS Pensions Team:** On 5 June 2023, a poster to raise awareness of the SFRS Pensions Team was sent to all Station Commanders. An email was also sent to Station Commanders to confirm a poster would be sent to their stations. An item was included in SFRS News on 9 June 2023.
- **Planning for Retirement News item:** An article was added to SFRS news on 23 June 2023, prompting members thinking about retirement to visit the Pensions Information SharePoint site for information and guidance.
- **Backdated Pay Awards News Item:** An article was published in SFRS news on 7 July 2023 regarding pension projections and the impact of the backdated pay awards.

2.18 Since the Pensions SharePoint site was shared with members of the Service, there has been a total of 2482 visits to the site. The below table shows a summary of site traffic since 1 April 2023.

Time Period	Total Number of Visits to the SharePoint Site	Number of Visits to Pensions SharePoint Site in this period	Number of individual member visits	Average time spent visiting the Site
1 April – 27 June	2482	1005	209	2 minutes 26 seconds

It is important to note that the analytical information available, from the Pension SharePoint site, is limited as it is only possible to track the most popular pages in the previous 7 days. This has not been included as it does not represent a useful overview of site use.

Training from the LGA

2.19 From the training the LGA delivered to the Board in March 2023, the actions for the Service to work through, have been updated. These actions are applicable to all FRAs in England. An update of the progress the Service has made on the actions can be found below.

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	<ol style="list-style-type: none"> 1. Consider adoption of the Immediate Detriment Framework. 2. Maintain communication with members and local rep bodies. 3. Continue data collection work for cases. 	<ol style="list-style-type: none"> 1. Completed 2. Completed 3. Completed <p>All items are completed as the Service has taken the decision to not adopt IDF as the legislation is due to be implemented in October 2023.</p>
Matthews / Modified	<ol style="list-style-type: none"> 1. Respond to consultation. 2. Identify members in scope. 	<ol style="list-style-type: none"> 1. Completed 2. Completed
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. Completed 2. Underway 3. Ongoing

Risk Management

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

3.0 Summary

3.1 The Board is asked to note the update provided.

Report contacts: Sally Wilson and Janine May
Contact details: E: sally.wilson@surreycc.gov.uk
E: janine.may@surreycc.gov.uk

Sources/background papers: N/A

Annexes: N/A

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Surrey Fire & Rescue Authority

Pension Board Report

2023/2024 – Q1

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01 Overview

Regulations and Guidance

April 2023

LGA issued Bulletin 68

Bulletin 68 covered many topics most with actions arising, see below:-

Actions arising

Consultation on the Firefighters' Pension Scheme (Remediable Service) Regulations 2023

FRA's are encouraged to respond to the consultation by the deadline of 23rd May 2023.

XPS will be providing their response.

Consultation on Retained Firefighters' Pensions: Proposed changes to the Firefighters' Pension Scheme (England) 2006

FRA's are encouraged to respond by the deadline of 9th June 2023 - XPS will be providing their response.

Commutation on retirement factors and guidance update

The factors are effective from 3 April 2023, please ensure that you are using the correct factors for any retirements following 3 April 2023 (inclusive). XPS confirm that they are using the correct factors

Secondary Contracts – Injury and Death Benefits

LGA suggest that FRA's review their contracts to ensure that a secondary contract has been awarded correctly.

Matthews Poster

LGA has been published a Matthews Poster which can be found under the Second options exercise resources on the special members of FPS 2006 page

Each FRA can personalise the poster and publicise the second options exercise at their fire authority and fire stations.

Annual Allowance - Impact of the backdated pay award

FRA's and administrators to consider the factsheet when determining their calculations for Annual Allowance where a backdated pay award has occurred.

Generic Text for Retirement and Estimates Letters

The Fire Communications Working Group has agreed template wording below for FRA's or Administrators to include within their estimate/retirement letters to cover re-employment.

FRA's and/or administrators need to consider whether to include this in their letters.

Request for contact details

FRA's are requested to remind members, in correspondence, which is sent out, to keep their administrators updated of any change in address or contact details. FRA's to include a request in correspondence to all members.

Other News

HMRC retained firefighter bulletin

We are aware that HMRC have recently sent out emails to Fire Authorities in England, Wales and Northern Ireland asking for further information in relation to National Insurance refunds for retrospective entry into the pension scheme.

Each Fire Authority scheme has received information bespoke to them.

HMRC have provided further clarity around the information they have requested which can be located in the first options exercise resource area of the Regulations and Guidance website.

May 2023

LGA issued Bulletin 69

Bulletin 69 covered many topics most with actions arising, see below:-

Actions arising

Consultation on the Firefighters' Pension Scheme (Remediable Service) Regulations 2023

FRAs and administrators should familiarise themselves with the response, ahead of the Home Office's response to the consultation

The Pension Regulator data requirements – 2023 scheme return:

FRAs and administrators to review the data scoring guidance for 2023 ahead of the scheme return.

Ill health re-assessment IQMP template referral letters available:

FRAs should send these and the relevant accompanying documentation to the IQMP using the relevant IQMP template referral letter.

Government Actuaries Department (GAD) - updated factors:

FRAs and Administrators to ensure that they are using the correct factors.

Data Conference Slides:

FRAs to view the slides and consider data more strategically now and in the future

Age Discrimination remedy – data sharing: Administrators to share pensionable data

for members who are subject to age discrimination remedy and have had an interbrigade transfer during the remedy period with the current FRA's administrator on request.

To review your privacy notice and add some additional wording, where relevant. Any amendments should be approved as per your internal processes.

Automatic enrolment – Call for evidence:

FRAs to be aware of this call for evidence.

The Public Service Pension Schemes (Rectification of Unlawful Discrimination) (Tax) (No. 2) Regulations 2023 :

Interested parties to review the consultation and establish whether you wish to respond to the consultation by 19 June 2023. Also, consider whether you wish to be part of the round table sessions.

SAB response to the Consultation on the Firefighters' Pension Schemes (Remediable Service) Regulations 2023:

FRAs and administrators should familiarise themselves with the response, ahead of the Home Office's response to the consultation.

SAB Guidance Note on Pensionable Pay Remedies:

FRAs to refer to the pensionable pay note when dealing with cases where elements of pay need retrospectively adjusting.

HMRC Remedy Newsletter:

Administrators and FRAs to consider whether you wish to volunteer to assist HMRC

June 2023

To be updated once XPS Technical Team have considered the latest bulletin

Additional Work / Previous Minutes

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

Work continues with our provider. A revised file is due to be submitted in June, as there are new data sources available which will enhance the return rate. We are also looking into mortality screening costs and will be undertaking a project to offer this service.

Conditional Data Testing

Our work is ongoing to map the entire Firefighter Pension Schemes to a Conditional Data testing facility within XPS which will give a conditional data score. This is a prerequisite to being able to prove that we are 'Dashboard Ready' in advance of connecting to MAPS Dashboard service in late 2026 following the governments restated connection confirmation.

We will also receive a refresh of the common data which will include more tests to prove the quality of this data. Once available, we will submit a data report into the Service.

National Fraud Initiative

Towards the later part of 2022, information was submitted to the National Fraud Initiative as it is done every two years. Queries are now available which the team are working through, this ensures there is no undeclared or unintended cross-over of benefits in payment from the Firefighters Pension Scheme and the state benefit system.

Year-end Data Templates

The templates for the collection of year end information have been sent early in 2023. The requirements are somewhat simplified from last year's request due to the 2015 scheme being the only scheme containing active members.

The deadline for return of this was the 15th May and following receipt of these files, we will update all active member records with contributions and pension accrual data for the 2022/ 2023 scheme and financial year.

Work continues with SFRS to ensure statutory deadlines are met, however the retrospective pay award is an ongoing issue that all parties are working to resolve.

Analysis of late tasks

Further to your request to provide analysis regarding the work completed outside of the KPI periods.

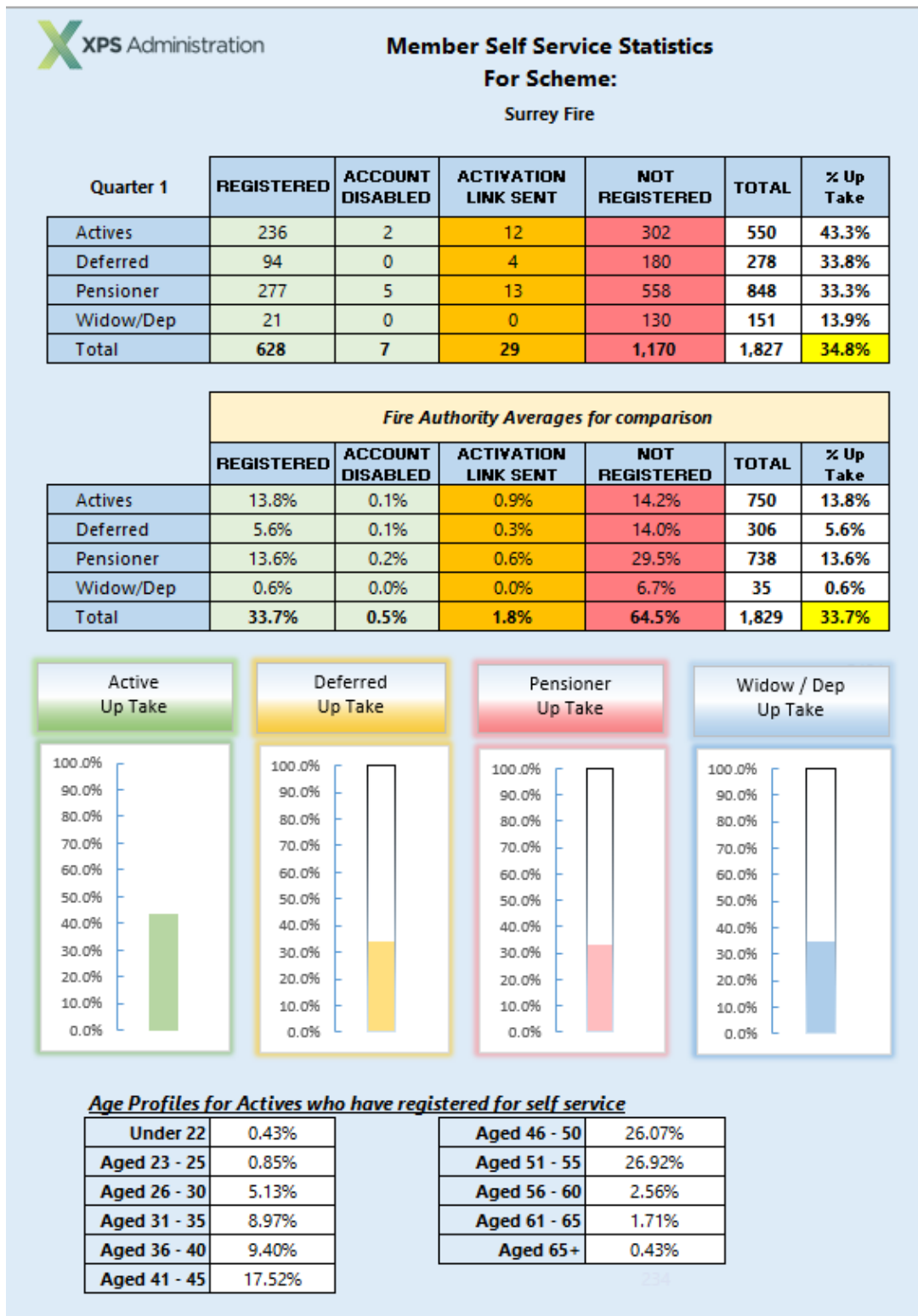
This is being looked at within the Administration team. It is expected that this will become available. We are looking at the best ways to present this information as it is something that we are keen to provide. A Verbal update in respect of the longest failure will be provided to the Board.

Pension Scams

A verbal update will be given to the Pension Board covering regulations, processes and communications considered when combating pension scams.

02 Member Self Service

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



03 Common Data

Surrey Fire				57	▼
Data Test	Common data score			Previous Quarter	
	Max Population	Total Fails	% OK	Total Fails	% OK
NINO	2278	2	99.91%	2	99.91%
Surname	2278	0	100.00%	0	100.00%
Forename / Inits	2278	0	100.00%	0	100.00%
Sex	2278	0	100.00%	0	100.00%
Title	2278	0	100.00%	0	100.00%
DoB Present	2278	0	100.00%	0	100.00%
Dob Consistent	2278	0	100.00%	0	100.00%
DJS	2278	0	100.00%	0	100.00%
Status	2278	0	100.00%	0	100.00%
Last Status Event	2278	4	99.82%	1	99.96%
Status Date	2278	17	99.25%	18	99.22%
No Address	2278	10	99.56%	11	99.52%
No Postcode	2278	17	99.25%	17	99.26%
Address (All)	2278	50	97.81%	56	97.56%
Postcode (All)	2278	56	97.54%	62	97.30%
Members with a Fail	2278	27	98.81%	25	98.91%
Members with Multiple Fails	2278	51	97.76%	57	97.51%
Total Fails	2278	78	96.58%	82	96.42%

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

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

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

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

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

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

04 Membership

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

Quarter 1 2023 - 2024

Scheme	Actives	Deferred	Pensioner	Widow	Dependant
Old-FPS	0 -	68 ▼	800 ▲	139 ▼	8 -
New-NFPS	3 ▲	101 ▲	21 -	1 -	0 -
CARE - 2015	547 ▼	111 ▲	25 ▲	2 -	1 -
Total	550 ▼	280 ▲	846 ▲	142 ▼	9 -

Previous Quarter 4

Scheme	Actives	Deferred	Pensioner	Widow	Dependant
Old-FPS	0 -	71 ▼	797 ▲	141 -	8 -
New-NFPS	2 -	100 ▲	21 -	1 ▲	0 -
CARE - 2015	565 ▼	103 ▲	21 ▲	2 -	1 -
Total	567 ▼	274 ▲	839 ▲	144 ▲	9 -

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

05 Completed Cases Overview

Current Year 2023/2024

Surrey Fire	Cases completed	Cases completed within target	Cases completed outside target	Cases: % within target
April	40	36	4	90%
May	46	39	7	85%
June	0	0		
Quarter 1	86	75	11	87%
July				
August				
September				
Quarter 2				
October				
November				
December				
Quarter 3				
January				
February				
March				
Quarter 4				
Year - Total	86	75	11	87%

Previous Year 2022/2023

Surrey Fire	Cases completed	Cases completed within target	Cases completed outside target	Cases: % within target
Quarter 3	111	109	2	98%
January	46	45	1	98%
February	44	40	4	91%
March	47	44	3	94%
Quarter 4	137	129	8	94%
Year - Total	567	495	72	87%

This table is designed to be a very quick, at a glance, display of the total cases completed within the year. Further details on specific workflows are shown below.

06 Completed Cases by Month

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

April 2023

April 2023					
Service	Days	Minimum Target	Cases	Within Target	Actual Performance
Death in Service	5	100	0	0	0
Death of a pensioner	5	100	0	0	0
Deferred Benefits	10	90	4	4	100
Divorce Cases	30	100	0	0	0
Estimates	10	100	1	0	0
General	10	100	21	18	86
Processing new entrants	10	90	0	0	0
Refunds	10	100	0	0	0
Retirement Actual	10	100	1	1	100
Retirement Options	10	100	2	2	100
Transfers – in (Calculation)	10	90	1	1	100
Transfers – in (Payment received)	10	90	0	0	0
Transfers – Out (Calculation)	10	100	0	0	0
Transfers – Out (Payment)	10	100	0	0	0
Variations	10	90	10	10	100

May 2023


May 2023					
Service	Days	Minimum Target	Cases	Within Target	Actual Performance
Death in Service	5	100	0	0	0
Death of a pensioner	5	100	1	1	100
Deferred Benefits	10	90	5	5	100
Divorce Cases	30	100	0	0	0
Estimates	10	100	6	3	50
General	10	100	17	13	76
Processing new entrants	10	90	1	1	100
Refunds	10	100	0	0	0
Retirement Actual	10	100	2	2	100
Retirement Options	10	100	3	3	100
Transfers – in (Calculation)	10	90	0	0	0
Transfers – in (Payment received)	10	90	0	0	0
Transfers – Out (Calculation)	10	100	0	0	0
Transfers – Out (Payment)	10	100	0	0	0
Variations	10	90	11	11	100

Task analysis

With reference to April and May 2023 KPI compliance is slightly lower than that reported in March 2023, but this represents only one additional case. Patterns of work continue to be the same as reported in previous months and quarters and we are looking at additional training areas. We will continue to monitor performance and raise any areas of concern if necessary.

07 Complaints

Full Name	Description	Date received	Date completed	Comment
	None this period			



Paul Mudd
Governance Manager
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XPS Pensions Group, XPS Pensions, XPS Group, XPS Administration, XPS Investment and XPS Transactions are the trading names of Xafinity Consulting Ltd, Punter Southall Ltd and Punter Southall Investment Consulting Ltd.

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Surrey Local Firefighters' Pension Board 20 July 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 68, 69 and 70 (Annex 1, 2 and 3) have been published since the last Board meeting.

- Bulletin 68 reminded readers of the publication of the [Consultation on the Firefighters' Pension Schemes \(Remediable Service\) Regulations 2023](#), by the Home Office. The deadline, for responses to the consultation, was 23 May 2023. Both the LGA and The SFRS Pension Team submitted responses to the consultation prior to the deadline. The [LGA response](#) is available on the Consultations section of the Firefighters' Pension Schemes Regulations and Guidance website.
- The bulletin notified readers that, on 31 March 2023, the Home Office published a [Consultation on Retained Firefighters' Pensions: proposed changes to the Firefighters' Pension Scheme \(England\) 2006](#). These regulations seek to provide further remedy to retained firefighters, employed between 7 April 2000 and 5 April 2006 inclusive, by offering access to the modified section of the Firefighters' Pension Scheme 2006. The SFRS Pension Team submitted their response to the consultation before the deadline of 9 June 2023.
- Bulletin 68 confirmed that the Government Actuary's Department (GAD) has published revised [commutation factors](#) for use on retirement from the FPS 1992. The factors are effective from 3 April 2023 and FRAs must ensure that the correct factors are applied for retirements from 3 April 2023.
- The bulletin notified readers that the LGA has received several enquiries with regards to secondary contracts and eligibility under the Firefighters' Compensation Scheme. The LGA confirmed that eligibility under the Scheme with regards to [secondary contracts](#) has not changed since the introduction of the compensation scheme in 2006. The [Secondary Contract – Injury and Death benefits factsheet](#) provides some useful guidance for FRAs. SFRS is in the process of reviewing their contract to ensure that a secondary contract award has been applied correctly.
- Bulletin 68 informed readers that a poster has been drafted to help FRAs engage with retained/on call firefighters ahead of the Matthews second options exercise. The SFRS Pension Team has published a tailored version of the poster, for display at all

Surrey fire stations. The template is available on the [Second options exercise – Resources section](#) of the FPS website.

- Bulletin 68 advised that the 2023 annual benefit statements (ABS) will be based on scheme regulations up to 31 March 2023, using the same approach as was adopted last year. ([FPS Bulletin 57](#) provides more information).
- The bulletin confirmed that the [Lifetime Allowance \(LTA\) factsheet](#) has been updated to reflect the spring budget announcements (covered in [Bulletin 67](#)). A further [factsheet](#) has been published, to assist FRAs, regarding the impact of the backdated pay award on Annual Allowance calculations.
- Bulletin 68 requested FRAs to ensure its members inform the pension administrators of any change in address or contact details. The Pension Team will include a request in all correspondence and emails sent to members.
- The bulletin informed readers that HMRC has issued a [bulletin](#) clarifying the information requested regarding National Insurance refunds in respect of retained firefighters included in the pension scheme under the first options exercise.

Although, HMRC has not included a deadline for the return of the information requested the LGA has requested that the information be returned to HMRC by 31 July 2023. This will allow HMRC to assess the Fire Authorities and members refund position. SFRS have no members affected by this request.

- Bulletin 68 notified readers that The Pensions Regulator (TPR) held a [Pension Dashboards webinar](#) on 30 March 2023. The webinar summarised the data preparation duties for pension schemes and how they must ensure their data is accurate and digitally accessible.
- The Bulletin confirmed The Pensions Regulator (TPR) published its [2023/24 Corporate Plan](#), on 21 April 2023. The plan outlines its key priorities for the year, including:
 - working with the Financial Conduct Authority and DWP to develop a value for money framework.
 - launching the new defined benefit funding code.
 - laying foundations for addressing quality outcomes in defined contribution schemes.
 - tackling scammers.
 - supporting schemes to prepare for dashboards.

The TPR [press release](#) provides further information.

- Bulletin 68 confirmed the Government has extended the deadline for paying voluntary National Insurance contributions from 5 April 2023 to 31 July 2023. This was announced in a [ministerial statement](#) published on 7 March 2023 and applies for tax years 2006/07 to 2016/17.
- The Bulletin announced that the Welsh Government has published a consultation setting out the proposed [McCloud remedy](#) for the Welsh Firefighters Pension Scheme. The consultation closes on 23 June 2023.
- Bulletin 68 notified readers of a [Lifetime allowance guidance newsletter](#), published by HMRC on 27 March 2023. The newsletter contains articles on:
 - pension commencement lump sum and lifetime allowance protections.

- taxable lump sums and employer PAYE payroll reporting.
 - the public service pensions remedy.
 - the lifetime allowance working group.
- Bulletin 69 reminded readers that, in [Bulletin 59](#) – July 2022, the Fire Technical Working Group (FTWG) confirmed that information can be shared with the current administrator instead of the current FRA. This does not present any GDPR issues because the administrator has a legitimate reason for needing the data. The SFRS Pension Team can confirm that their privacy notice reflects this.
 - Bulletin 69 also confirmed that The Scheme Advisory Board (SAB) has responded to the consultation on the Firefighters’ Pension Schemes (Remediable Service) Regulations 2023. This can be viewed in the [Consultations section](#) of the Firefighters’ Pensions SAB (England) website.
 - Bulletin 69 advised readers that the Scottish Public Pensions Agency (SPPA) published the Firefighters’ Pension Scheme [Consultation](#) on 16 May 2023, regarding implementing the 2015 remedy. These regulations concentrate on the retrospective elements of the 2015 Remedy that are required to fully deliver the remedy and closes on 23 July 2023.
 - Bulletin 69 also advised that The National Police Chiefs Council (NPCC) has responded to the retrospective remedy consultation and their response is available on the age discrimination – [useful information](#) page on the restricted member area of the Firefighters’ Pension Schemes Regulations Guidance website.
 - Bulletin 69 confirmed that HM Treasury (HMT) published a written [ministerial statement](#) on 15 May 2023, on the cost control mechanism and reformed scheme design. The publications confirm only the reformed scheme design will be included in the cost control mechanism. Any cost increases associated with final salary benefits and the impact of the underpin, will be excluded.
 - Bulletin 69 announced that the Department for Work and Pensions (DWP) published a [call for evidence](#) on 15 May 2023, on the alternative quality requirement used by defined benefit schemes for automatic enrolment (AE). The existing requirements allow schemes to apply simplified tests to demonstrate employers are fulfilling their AE duty. The call for evidence aims to conclude whether the government’s policy in this area continues to be achieved and closes on 19 June 2023.
 - Bulletin 69 confirmed that the Pensions Dashboards Programme (PDP) published their [Progress update report](#) on dashboards in May 2023. This includes the reset of pension dashboards connection times, preparing data for dashboards and understanding legal obligations.
 - The Bulletin announced that, on 2 May 2023, the [Pensions Dashboards \(Prohibition of Indemnification\) Act 2023](#) received Royal Assent. The Act prohibits trustees and managers of pension schemes from being reimbursed out of scheme assets for any penalties imposed on them under the [dashboard regulations](#).
 - The Bulletin confirmed that The Pensions Ombudsman (TPO) has published a factsheet titled [‘Where to go for help with your pension complaint’](#). The factsheet assists members when deciding whether to refer their complaint to TPO or the Financial Ombudsman Service.

- Bulletin 69 announced that on 12 May 2023, the Pensions Regulator (TPR) updated its website regarding a recent Capita cyber security incident. This follows a security breach where it has been confirmed that some data has been exfiltrated from Capita's servers. Administrators have been alerted to check if any pension scheme data could be affected.
- Bulletin 69 announced that on 23 May 2023, HMRC published a [consultation](#) on The Public Service Pension Schemes (Rectification of Unlawful Discrimination) (Tax) (No.2) Regulations 2023 which set out changes to how pensions tax rules will apply due to the public service pensions remedy. HMRC have also published a [summary](#) paper which provides a short introduction to the consultation. The LGA is responding to the consultation.
- Bulletin 69 advised readers that HMRC has published a [Remedy newsletter](#) on 23 May 2023. The newsletter provides information on draft regulations and HMRC processes to support the McCloud remedy. As part of this, HMRC will provide a single point of contact for each public service organisation.
- The Bulletin also confirmed that HMRC is currently drafting McCloud remedy guidance, which is due to be published in Autumn 2023.
- Bulletin 70 reminded readers of the importance of timely completion of the data collection exercise in readiness for implementation of the remedy options exercise from October 2023. The data collection for the FPS 1992 was completed in May 2023, and the Pension Team are on target to complete the FPS 2006 data collection by the end of July 2023.
- Bulletin 70 confirmed that the LGA has collaborated with the Fire Brigade Union, to locate pay scales back to 1962. These have been added to the Firefighter Pay Scales page on the member restricted area of the [Firefighters' Regulations and Guidance website](#). This will serve as a pay reference source for the Retained firefighters (Matthews) remedy where historical pay information is not otherwise available.
- The Bulletin advised that on 21 June 2023, the Home Office emailed all FRAs in England to give notice that they will shortly be writing to formally request submission of pension income/expenditure forecasts for the period 2023-24 to 2028-29 via the online DELTA system. The payroll team are collating the necessary information to ensure the forecasts are submitted to the Home Office by the deadline of Friday 25 August 2023.
- Bulletin 70 noted the Government Actuary's Department (GAD) reference to the importance of data for setting long term strategy in relation to the management of pensions. GAD have now published a [news feature](#) reflecting on the event as well as covering a broader focus on data generally. This makes interesting reading and includes comparing the matching process in Pension Dashboards to a game of 'Guess Who'.
- The Bulletin informs readers of the availability of a [remedy self-assessment tool](#) on the FPS Regulations and Guidance website. This tool is designed to assist FRAs in

assessing whether they have the necessary preparation in place for remedy and whether there are any potential gaps which need addressing. The Pension Team are in the process of completing this exercise and the results will be included in the next Local Pension Board meeting.

- Bulletin 70 referred to the discussion on Pensions Dashboards at the Police and Fire Data Conference event on 17 May 2023. The LGA have created a [Q&A document](#), on the Data Conference page of the Firefighters' Regulations and Guidance website, which provides a useful reference source of the main concerns raised at the conference.
- Bulletin 70 reminded readers of the Coffee Morning of 26 January 2023 – [HMT Remedy Directions](#), which was noted in [FPS Bulletin 65](#). The Government Actuary's Department (GAD) has created [remedy member examples](#) relating to interest and member contributions and these have been added to the Retrospective Remedy page of the Firefighters Pension Regulations and guidance web.
- [FPS Bulletin 67 – March 2023](#) advised that the High Court upheld HM Treasury's decision to include the McCloud remedy in the cost cap mechanism. However, Bulletin 70 confirmed that the Court of Appeal has now granted unions permission to appeal against the recent High Court judgement over the government's proposed method of paying for costs incurred by the McCloud ruling in public sector schemes.
- Bulletin 70 confirmed that a [Ministerial Statement](#) was made, on 8 June 2023, to announce that amending legislation will be laid to amend the Pensions Dashboard Regulations 2022. On 9 June 2023 the Department for Work and Pensions (DWP) laid draft [Pensions Dashboards \(Amendment\) Regulations 2023](#). The amending regulations remove the phased staging timeline, replacing it with a single connection deadline of 31 October 2026. The DWP and Money and Pensions Service (MaPS) are expected to issue guidance setting out a staged connection timeline for individual schemes, and they aim to collaborate with industry on the guidance later this year.
- Bulletin 70 advised readers that The Pension Regulator (TPR) published a blog '[Make time to get your data dashboard ready](#)' on 14 June 2023. The blog encourages pension schemes to continue working on their data to ensure that it is ready for dashboards. It also sets out what schemes should be considering when doing so.
- The Bulletin also informed readers that TPR has amended its [dashboard guidance](#), following the amendment to the dashboard deadline. FRAs are encouraged to continue to assess the potential impact of these changes on their scheme and to agree a practical delivery plan.
- Bulletin 70 advised that the Pensions Administration Association (PASA) has also published [guidance](#) designed to provide "good practice" approaches to providing value data to pensions dashboards. The guidance is intended for use by both DC and DB schemes and covers 20 topics including possible approaches for dealing with issues such as late retirements, underpins, partial retirements and split normal retirement ages.

- Bulletin 70 confirmed that The Pensions Ombudsman (TPO) is expanding its network of [volunteer advisers](#). Anyone interested can [apply](#) via the website to be a volunteer, or email TPO's Network Manager Paul Day at paul.day@pensionsombudsman.org.uk.
- The Bulletin also advised readers that the Voluntary National Insurance contributions deadline has been extended in a written ministerial statement published by the Government on 12 June 2023. The deadline has been extended from 31 July 2023 to 5 April 2025. This applies for tax years 2006/07 to 2017/18 and gives individuals the opportunity to fill gaps in their NI record to boost their State Pension.

Bulletin Update contacts: Sally Wilson and Janine May

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Annexes

Annex 1: FPS Bulletin 68

Annex 2: FPS Bulletin 69

Annex 3: FPS Bulletin 70

FPS Bulletin 68 – April 2023

Welcome to issue 68 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
Police and Fire Data Conference	17 May 2023
FPS coffee morning	6 June 2023
SAB	8 June 2023

FPS Technical Working Group	20 June 2023
FPS Communications Working Group	19 July 2023
SAB	14 September 2023
Fire Pensions Annual Conference	19 and 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.

[Consultation on Retained Firefighters' Pensions: Proposed changes to the](#)

[Firefighters' Pension Scheme \(England\) 2006](#): All interested parties are encouraged to respond to the consultation by the deadline of 9 June 2023.

[SCAPE Discount Rate Methodology Consultation Response](#): The CETV technical note was suspended on 30 March 2023. All CETV's, Pensioner cash equivalents and non-club transfers-in should be suspended until the revised technical note is published.

[Fire England – Commutation on retirement factors and guidance updated](#): The new factors are effective from 3 April 2023. Please ensure that you are using the revised factors for any retirements after this date.

[Secondary Contracts](#) – FRAs may wish to review their contracts to ensure that a secondary contract has been awarded correctly.

[A Matthews poster](#) has been published under the [Second options exercise – Resources](#) on the Special members of FPS 2006 page: FRA's will need to personalise the poster and publicise the second options exercise at their fire authority and fire stations.

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[Bluelight Inbox Technical Queries](#) - As covered in [Bulletin 58 – June 2022](#), please can we remind you to complete the [query form](#) for all technical queries that are sent to the Bluelight inbox.

[Generic text for estimate/retirement letters](#): FRAs to consider including within their estimates and/or retirement letters to members.

[Request for contact details](#): FRAs and administrators are reminded to include a request to members to keep them updated of any change of contact details in correspondence which is issued to them.

[Annual Allowance – Impact of the backdated pay award](#): FRA's and administrators to consider the factsheet when determining their calculations for Annual Allowance where a backdated pay award has occurred.

FPS

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

As a reminder in [FPS Bulletin 67 – March 2023](#) we informed you that the above consultation had been launched.

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.

[Consultation on the retained Firefighters' Pensions: Proposed changes to the Firefighters' Pension Scheme \(England\) 2006](#)

On 31 March 2023, the Home Office published [a consultation on the proposed changes to the Firefighters' Pension Scheme \(England\) 2006 in relation to retained Firefighters'](#). These regulations concentrate on providing further remedy to those individuals who were employed as retained firefighters between 7 April 2000 and 5 April 2006 inclusive providing access to the modified section of the Firefighters'

[Click here to return to Contents](#)

Pension Scheme 2006 (referred to as ‘the modified scheme’).

The LGA will respond to the consultation and share our response before the consultation closes on 9 June 2023.

ACTION: All interested parties are encouraged to respond to the consultation by 9 June 2023.

Fire England – Commutation on retirement factors and guidance update

On 3 April 2023, following the announcement of the revised SCAPE rate, the Government Actuary’s Department (GAD) published [revised commutation on retirement from FPS 1992 factors and guidance](#).

The factors are effective from 3 April 2023.

ACTION: Please ensure that you are using the correct factors for any retirements following 3 April 2023 (inclusive).

Secondary Contracts – Injury and death benefits

We have received several enquiries with regards to secondary contracts and eligibility under the Firefighters’ Compensation Scheme.

The position has not changed since the introduction of the compensation scheme in 2006 and was communicated to FRAs when we were considering implications of [COVID-19 resilience cover](#).

In order to determine the pensionable consequences of the secondary contracts, with particular reference to the compensation scheme, FRAs should consider the [Secondary Contract – Injury and Death benefits factsheet](#).

ACTION: FRAs may wish to review their contracts to ensure that a secondary contract has been awarded correctly.

Matthews Poster

At the Matthews Technical Working Group and [Firefighters Communications Working Group](#) we discussed the request for a poster to assist FRAs with engaging

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with retained/on call firefighters ahead of the Matthews second options exercise.

The poster has been published under the [Second options exercise – Resources](#) on the special members of FPS 2006 page.

ACTION: FRAs will need to personalise the poster and publicise the Matthews second options exercise at their fire authority and fire stations.

Annual Benefit Statements 2023

As annual benefit statements (ABS) in 2023 will be based on current scheme regulations up to 31 March 2023, it is recommended that the same approach is adopted as in 2022. [FPS Bulletin 57 – May 2022](#) provides more information.

The standard ABS template, annexes, notes and factsheet have been updated with the new scheme year and published on the [FPS Regulations and Guidance website](#).

FPS 1992 Commentary

Eunice Heaney has very kindly provided updated FPS 1992 Commentary content and a new page [FPS 1992 Commentary](#) has been added to the restricted Member Area on the Firefighters Regulations and Guidance website.

Ill Health process guide

An [ill health process guide](#) has been published to help FRAs navigate the ill health process, and understand their role, as employer and the content of the ill health certificates.

The process guide has been published under resources on the [ill health and injury](#) pages on the restricted Member Area of the Firefighters Regulations and Guidance website.

LTA Factsheet

The [LTA factsheet for members](#) has been updated to reflect the spring budget announcements, as covered in [FPS Bulletin 67 – March 2023](#). The factsheet can be found in the [Guides and sample documents section](#) of the Firefighters Regulations and Guidance website.

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Annual Allowance – impact of backdated pay award

A [factsheet](#) has been produced to assist FRAs and administrators regarding the impact of the back dated pay award on the Annual Allowance calculations.

ACTION: FRAs and administrators to consider the factsheet when determining their calculations for Annual Allowance where a backdated pay award has occurred.

Generic text for estimate/retirement letters

The Fire Communications Working Group has agreed template wording below for FRAs to include within their estimate/retirement letters to cover re-employment:

If you have membership in the 1992 Firefighters' Pension Scheme and you are retiring under the age of 55 and not on Ill Health, you will have a Protected Pension Age (PPA) which enables you to draw your benefits before age 55.

For employees who have a PPA and are re-employed with a Fire and Rescue Service or a Sponsoring Employer¹ in any role in any capacity, between the ages of 50 and 54 inclusive, they may be subject to additional tax charges, unless certain conditions are applied.

This will also apply if an employee remains in employment as a retained/on call firefighter beyond retirement from a wholetime role.

To satisfy the conditions to retain your PPA and to avoid the additional tax charges, you must leave all employments with the Fire and Rescue Service or Sponsoring Employer on the same date and have at least one calendar month break before you are re-employed; your pension must also be subject to abatement.

[Further information relating to XXX's retirement policy is available from your employer.]

Failure to notify the Pensions Team of any re-employment may result in your pension being overpaid and you will be required to repay any overpaid pension.

¹ Local Authority when an FRA is part of the Local Authority

ACTION: FRAs to consider including within their estimate and/or retirement letters.

Industrial Action template letter

A template letter has been produced to cover pension contribution repayment requests from members should there be any instances of industrial action in future years. The template letter has been published in the [Guides and sample documents section](#) of the Firefighters regulations and guidance website.

Request for contact details

FRAs are requested to remind members, in correspondence, which is sent out, to keep their administrators updated of any change in address or contact details.

ACTION: FRAs to include a request in correspondence to all members.

HMRC retained firefighter bulletin

We are aware that HMRC have recently sent out emails to Fire Authorities in England, Wales and Northern Ireland asking for further information in relation to National Insurance refunds for retrospective entry into the pension scheme. Each Fire Authority scheme has received information bespoke to them. HMRC have provided further clarity around the information they have requested which can be located in the [first options exercise resource area](#) of the Regulations and Guidance website.

Technical query log

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

There have been no queries added this month.

As covered in [Bulletin 58 – June 2022](#), please can we remind you to complete the [query form](#) for all technical queries that are sent to the Bluelight inbox.

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

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form when submitting a technical query.

FPS England SAB updates

SAB representation at Matthews Technical Working Group

In [FPS Bulletin 61-September 2022](#), we advised that a Matthews Technical Working Group had been set up to assist with the technical aspects of the implementation of the Matthews second options exercise. This group has met on a regular basis from that point with representation from the Home Office, the Government Actuary's Department, fire authorities and administrators. From April 2023, representation will include SAB members.

SAB website

You can use the links below to find out about the latest updates on the work of the SAB and its committees on the [SAB website](#):

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

Other News and Updates

SCAPE Discount Rate Methodology Consultation Response

In [Bulletin 67- March 2023](#) we informed you that the SCAPE discount rate had changed.

Administrators will recognise that when the SCAPE rate changes, CETV calculations are suspended until the factors can be amended in line with the new SCAPE rate.

On 11 April 2023 we confirmed that the CETV technical note had been suspended.

ACTION: All CETV's, Pensioner cash equivalents and non-club transfers-in should be suspended until the revised technical note is published.

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The Pension Regulator (TPR) dashboard webinar

TPR held a webinar on dashboards on 30 March 2023. The webinar covered data preparation duties and the steps schemes need to take to ensure their data is accurate, complete, up-to-date and digitally accessible. You can watch a [recording of the webinar](#) on their website.

The Pensions Regulator Corporate plan 2023/24

On 21 April 2023, TPR published [its Corporate Plan for 2023/24](#).

The plan outlines TPR's key priorities for the year. These include:

- working with the Financial Conduct Authority and DWP to develop a value for money framework
- launching the new defined benefit funding code
- laying foundations for a significant increase in addressing quality outcomes in defined contribution schemes
- increasing its attention on tackling scammers
- supporting schemes to prepare for dashboards.

The document also includes TPR's plans beyond March 2024.

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

Voluntary NI contributions deadline extended

In [a written ministerial statement](#) published on 7 March 2023, the Government announced that it was extending the deadline to pay voluntary National Insurance (NI) contributions from 5 April 2023 to 31 July 2023. This applies for tax years 2006/07 to 2016/17. This came after HMRC and DWP had experienced a recent surge in customer contact.

Paying voluntary NI contributions enables individuals to fill gaps in their NI record to boost their State Pension.

For more information, see [the policy paper](#) the Government published on 24 March 2023.

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McCloud remedy consultation – Welsh firefighters’

The Welsh Government has published [a consultation setting out the proposed McCloud remedy](#) for the Welsh Firefighters Pension Scheme, The consultation closes on 23 June 2023.

HMRC

Lifetime allowance guidance newsletter – March 2023

On 27 March 2023, HMRC published [Lifetime allowance guidance newsletter – March 2023](#). It contained articles on:

- pension commencement lump sum and lifetime allowance protections
- taxable lump sums and employer PAYE payroll reporting
- the public service pensions remedy
- the lifetime allowance working group

HMRC issues newsletter 149

On 26 April 2023, HMRC published [newsletter 149](#). The newsletter contains articles on:

- the annual allowance calculator – currently members cannot use it for tax year 2023/24
- Pension Scheme Returns
- reminding schemes to use the Managing Pension Schemes service to submit any new Accounting for Tax returns for any quarter beginning on or after 1 April 2020
- an update on submitting Event Reports.

Events

FPS coffee mornings

Our MS Teams coffee mornings are continuing regularly with the next session being held in June 2023. 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

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Bluelight team.

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

[11 April 2023 – Home Office Matthews 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

As detailed in [FPS Bulletin 67 – March 2023](#) we are holding a data conference jointly with the National Police Chiefs Council (NFCC).

The event is now fully booked; however you can email events@local.gov.uk to put your name on the waiting list, or to request dial in details.

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

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helpful if readers could bring any perceived errors or omissions to the attention of the Bluelight team by emailing bluelightpensions@local.gov.uk.

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FPS Bulletin 69 – May 2023

Welcome to issue 69 of the Firefighters’ Pensions Schemes bulletin.

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

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

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Calendar of events

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

Table 1: Calendar of events

Event	Date
FPS coffee morning	6 June 2023
SAB	8 June 2023
Northeast Fire Officers' Group	14 June 2023
FPS Technical Working Group	20 June 2023
Midlands Fire Officers' Group	22 June 2023
Eastern Fire Officers' Group	28 June 2023
FPS Communications Working Group	19 July 2023
SAB	14 September 2023
SAB	14 December 2023

Actions arising

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

[Regulations 2023](#): FRAs and administrators should familiarise themselves with the response, ahead of the Home Office's response to the consultation.

[The Pension Regulator data requirements – 2023 scheme return](#): FRAs and administrators to review the data scoring guidance for 2023 ahead of the scheme return.

[Ill health re-assessment IQMP template referral letters available](#): FRAs should send these and the relevant accompanying documentation to the IQMP using the relevant IQMP template referral letter.

[Government Actuaries Department \(GAD\) - updated factors](#): FRAs and Administrators to ensure that they are using the correct factors.

[Data Conference Slides](#): FRAs to view the slides and consider data more strategically now and in the future.

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

To review your privacy notice and add some additional wording, where relevant. Any amendments should be approved as per your internal processes.

[Automatic enrolment – Call for evidence](#): FRAs to be aware of this call for evidence.

[The Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) \(No. 2\) Regulations 2023](#): Interested parties to review the consultation and establish whether you wish to respond to the consultation by 19 June 2023.

Also, consider whether you wish to be part of the round table sessions.

[SAB response to the Consultation on the Firefighters’ Pension Schemes \(Remediable Service\) Regulations 2023](#): FRAs and administrators should familiarise themselves with the response, ahead of the Home Office’s response to the consultation.

[SAB Guidance Note on Pensionable Pay Remedies](#): FRAs to refer to the pensionable pay note when dealing with cases where elements of pay need retrospectively adjusting.

[HMRC Remedy Newsletter](#): Administrators and FRAs to consider whether you wish to volunteer to assist HMRC.

FPS

Consultation on the Firefighters' Pension Schemes (Remediable Service) Regulations 2023

In [FPS Bulletin 67 – March 2023](#) we informed you that the above consultation had been launched. The LGA has responded to the consultation and our response is available on the [Consultations section](#) of the Firefighters' Pension Schemes Regulations and Guidance website.

ACTION: FRAs and administrators to familiarise themselves with the response, for information ahead of the Home Office's response to the consultation.

The Pension Regulator (TPR) data requirements – 2023 scheme return

In [FPS Bulletin 25 – October 2019](#) the LGA provided fire authorities with informal data scoring guidance in order to complete The Pension Regulator's scheme return.

[The Data Scoring Guidance](#) has now been updated for the 2023 return to take account of age discrimination remedy and immediate detriment.

The guidance is available under Data Scoring on the [Guides and Sample documents](#) section the Firefighters' Pension Schemes Regulations and Guidance website.

ACTION: FRAs and administrators should ensure that they are aware of what is included when considering the data scores for the 2023 scheme return.

Ill health re-assessment IQMP template referral letters available

In [FPS Bulletin 63 – November 2022](#), we published an [ill-health reassessment factsheet](#) to help FRAs determine which individuals require a reassessment of their ill-health determination as a result of remedy implementation.

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

ACTION for FRAs: Once affected members of the pension scheme have returned the appropriate member consent letter, FRAs should send these and the relevant

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accompanying documentation to the IQMP using the relevant IQMP template referral letter.

Government Actuaries Department (GAD) – updated factors

In [FPS Bulletin 68 – April 2023](#) we confirmed that the CETV technical note had been suspended, and therefore all CETVs, Pensioner cash equivalents and non-club transfers-in should be suspended.

On 25 May 2023, Home Office confirmed that the following factors had been updated:

- CETVs (x-201 to x-215),
- Pensioner cash equivalents (x-301 to x-312),
- Pension credits (x-313 to x-317),
- Pension debits (x-318 to x-328)

The following should be noted:

- The updated factors have removed Guaranteed Minimum Pension (GMP) factors for all active members (where they had not already been removed) and for pensioner members aged under 69. GMP factors should no longer be needed for these members.
- The updated factors set all National Insurance Modification (NI Mod) factors to zero. For most members, NI Mod no longer has a material impact on benefits.

These factors should be implemented from 29 March 2023.

The updated factors should be used in conjunction with the relevant existing guidance notes in force for the Firefighters' Pension Schemes.

The factors are published on the relevant [GAD guidance pages](#) of the Firefighters Pension Scheme regulations and guidance website.

ACTION: FRAs and administrators to ensure that they are using the revised factors from 29 March 2023.

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Age Discrimination remedy - Data Sharing

As a reminder, in [FPS Bulletin 59 – July 2022](#), we covered that following a detailed discussion at the Fire Technical Working Group (FTWG) on Monday 25 July 2022 it was decided that, to remove any GDPR issues, the information should be shared with the current administrator instead of the current FRA. This is because the administrator has a legitimate reason for needing the data.

Administrators and FRAs may also want to consider adding some additional wording to their privacy notices to cover this.

Example text is as follows:

“From time to time, we will share your personal data with third parties, including our contractors, advisors, government bodies, and dispute resolution and law enforcement agencies. We do this in order to comply with our obligations under law, and to help us provide services and carry out our duties, rights and discretions in relation to the Firefighters’ Pension Scheme(s).

Occasionally, we may request/provide some of your data from/to a previous pension administrator for the purposes of enabling us to understand your pension rights from the scheme.”

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

To review your privacy notice and add some additional wording, where relevant. Any amendments should be approved as per your internal processes.

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.

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Queries have been answered this month in the following categories:

- Ill Health retirement – Payable under the Scottish Compensation Regulations page 93
- Cross Border transfers page 144

FPS England SAB updates

SAB response to the Consultation on the Firefighters' Pension Schemes (Remediable Service) Regulations 2023

In [FPS Bulletin 67 – March 2023](#) we informed you that the above consultation had been launched.

The Scheme Advisory Board has responded to the consultation and the response is available on the [Consultations section](#) of the Firefighters' Pensions SAB (England) website.

ACTION: FRAs and administrators to familiarise themselves with the response, for information ahead of the Home Office's response to the consultation.

SAB Guidance Note on Pensionable Pay Remedies

The legal adviser to the SAB, Weightmans, have written a [useful note on pensionable pay remedies](#). There are a number of [pensionable pay resources](#) available relating to the various landmark High Court decisions and Pension Ombudsman determinations about firefighters' pay, and what elements are pensionable under the Firefighters' Pension Scheme. The note provides an implementation plan for remedying cases in which pay has not been treated as pensionable but should have been under the scheme rules. It also highlights some issues that remain unresolved.

ACTION: FRAs to refer to the pensionable pay note when dealing with cases where elements of pay need retrospectively adjusting.

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SAB collaboration session on Matthews remedy

In [FPS Bulletin 61 – September 2022](#), we confirmed that the SAB, the LGA, and the Home Office were working together in the form of collaboration sessions on Matthews to discuss Matthews legislation and policy, the interaction between Matthews and McCloud and the proposed timeline for implementation. The first session took place during September 2022 and an additional session took place on 25 May 2023. Additionally, the Matthews Technical Working Group has met regularly since that time and now has SAB representation within the group.

SAB website

You can use the links below to find out about the latest updates on the work of the SAB and its committees on the [SAB website](#):

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

The next SAB meeting is on 8 June 2023.

Other News and Updates

The Scottish Firefighters' Pension Schemes' Consultation on implementing the 2015 Remedy

On 16 May 2023, the Scottish Public Pensions Agency (SPPA) published [Firefighters' Pension Scheme Consultation on the implementing the 2015 remedy](#). These regulations concentrate on the retrospective elements of the 2015 Remedy that are required to fully deliver the remedy.

The consultation closes on 23 July 2023.

The Police Pension Schemes' Consultation response to Retrospective remedy

The National Police Chiefs Council (NPCC) has responded to the consultation and their response is available on the [age discrimination – useful information](#) page on the restricted member area of the Firefighters' Pension Schemes Regulations and

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Guidance website.

Public Service Pensions – cost control mechanism and reformed scheme only design

On 15 May 2023, HM Treasury (HMT) published a [written ministerial statement](#) and [further detail](#), on the cost control mechanism and reformed scheme only design.

The publications confirm only the reformed scheme design will be included in the cost control mechanism. Any cost increases associated with final salary benefits and the impact of the underpin, will be excluded.

Automatic enrolment - call for evidence

On 15 May 2023, the Department for Work and Pensions (DWP) [published a call for evidence](#) on the alternative quality requirement used by defined benefit schemes for automatic enrolment (AE). The call for evidence closes on 19 June 2023.

The existing requirements allow for simpler alternative tests to be used so the scheme can demonstrate it is of sufficient quality to be used by employers to fulfil their AE duty. The call for evidence aims to conclude whether the government's policy in this area continues to be achieved.

ACTION for FRAs: FRAs to be aware of this call for evidence.

Consent and authorisation wording for dashboards

The Pensions Dashboards Programme (PDP) commissioned Ipsos to undertake [research to help develop consents and authorisation wording](#) for dashboards.

A research group covering a range of ages, income levels and pension types was asked to provide feedback on draft versions of consent and authorisation wording that would appear on dashboards. The wording explained what the Money and Pensions Service would and would not do with users' data and asked for consent for these uses. The feedback was positive and will be used to further shape the wording.

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Pensions Dashboards Latest news

In May 2023, PDP [published their Progress update report on dashboards](#). There are articles on:

- The Department for Work & Pensions (DWP's) written ministerial statement on pensions dashboards connection times confirming that there will be an update before Parliament's summer recess
- Programme reset following the written ministerial statement – reset got underway on 20 March and more information will be available before parliamentary recess starting in July
- Consent comprehension research - a research into users' understanding of how their data will be used during the dashboards journey
- Preparing for dashboards – connection, data, matching, awareness and understanding legal and regulatory obligations
- Updates from DWP, the Financial Conduct Authority and the Pensions Regulator
- Useful resources
- Subscribing to PDP's newsletter

Pensions Dashboards (Prohibition of Indemnification) Act 2023

On 2 May 2023, the [Pensions Dashboards \(Prohibition of Indemnification\) Act 2023](#) received Royal Assent.

The Act will prohibit trustees and managers of occupational and personal pension schemes from being reimbursed out of scheme assets for any penalties imposed on them under [the dashboard regulations](#).

The Act applies to the United Kingdom and comes into force on a date determined by the Department for Work and Pensions (or, in the case of Northern Ireland, the Department for Communities).

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[‘Where to go for help with your pension complaint’ factsheet](#)

On 27 April 2023, The Pensions Ombudsman (TPO) published a factsheet titled [‘Where to go for help with your pension complaint’](#).

The factsheet assists members when deciding whether to refer their complaint to TPO or the Financial Ombudsman Service.

[Capita cyber security incident](#)

On 12 May 2023, [the Pensions Regulator \(TPR\) updated its website](#) with a page covering the Capita cyber security incident. This follows a security breach where it is now known that some data has been exfiltrated from Capita’s servers.

TPR encourages all administrators who use Capita’s services to check whether their pension scheme data could be affected.

[Club transfers – extending the 12-month time limit](#)

On 26 April 2023, the cabinet office clarified a club transfer may take place outside the 12-month time limit, in exceptional circumstances and providing both the sending and receiving schemes agree. Colin Hennem (Pensions Technical Manager) confirmed:

“[the Club Memorandum](#) requires a transfer to be calculated on Club terms if the member confirms in writing that they wish the transfer to proceed within 12 months of joining the new Club scheme. The Club Memorandum is silent on what should happen if that confirmation is sent outside the 12-month time limit. However, it has long been our policy that the two schemes involved may agree to a Club transfer outside the 12-month time limit (i.e. a belated Club transfer) if there are exceptional circumstances that prevented the member from sending the confirmation within the 12 month time limit - e.g. if there were delays in providing the necessary quotes that were outside the member's control. In the past, when the additional cost of the more generous Club transfer terms was met by the receiving scheme, our view was that it was only necessary for the receiving scheme to agree to a belated Club transfer. However, under the 'inner' Club arrangements, the additional cost of the more generous terms is spread more evenly between the two schemes. Therefore, I think

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it is appropriate that a belated Club transfer can only proceed if both the sending and receiving schemes agree to this. The Cabinet Office (as Secretary to the Club) has no authority to compel the schemes in question to agree to a belated Club transfer.”

ACTION: Administrators to incorporate this into their club transfer process

NHS Pension Scheme consultation: changes to contribution thresholds

On 3 May 2023, the Department of Health and Social Care launched a consultation on uplifting the member contribution thresholds in the NHS Pension Scheme 2015 (England and Wales) for 2023/24. The consultation closed on 17 May 2023.

You can access the consultation documents on [the relevant page of gov.uk](#).

HMRC

The Public Service Pension Schemes (Rectification of Unlawful Discrimination) (Tax) (No. 2) Regulations 2023

On 23 May 2023, HMRC published a consultation on [The Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) \(No.2\) Regulations 2023](#) which set out changes to how pensions tax rules will apply as a result of the public service pensions remedy.

The draft regulations supplement [The Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) Regulations 2023](#) ('first set of regulations'), which came into force on 6 April 2023.

As part of the consultation, HMRC will be holding several round tables. This will provide an opportunity to raise any technical points on the draft regulations. If you would like to be involved, email policypensions@hmrc.gov.uk, putting 'Public service pensions remedy tax regulations round tables' in the subject line.

The LGA will respond to the consultation before the consultation closes on 19 June 2023.

ACTION: Interested parties to review the consultation and establish whether you

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wish to respond to the consultation by 19 June 2023.

Also, consider whether you wish to be part of the round table sessions.

Proposed Public Service Pension Schemes – Rectification of Unlawful Discrimination – Tax Administration Regulations Summary

HMRC have published a summary paper which provides a short introduction to the consultation reference above.

This has been published on the [age discrimination – retrospective remedy](#) pages of the Firefighters’ Pension scheme regulations and guidance website.

Remedy newsletter – May 2023

On 23 May 2023, HMRC published [Remedy newsletter May 2023](#). The newsletter provides information on the following topics:

- Draft regulations: summarises the draft rectification regulations mentioned in the article above.
- HMRC processes: HMRC is currently developing processes it will need to support the McCloud remedy. As part of this, they will provide a single point of contact for each public service organisation.
- Guidance: HMRC is currently drafting McCloud remedy guidance, which they hope to publish in Autumn 2023. In advance of this, they would like to test some of the guidance with users to make sure it is covering what is needed. If you would like to volunteer, email publicservicepensionsremedy@hmrc.gov.uk and put ‘Guidance testing’ in the subject line.

ACTION: Consider whether you wish to volunteer to assist HMRC

Events

Fire and Police Data Conference

We were pleased to welcome 140 delegates (60 in person to Smith Square and 80 virtually) on 17 May 2023, to hear a host of industry experts take part in panel

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sessions to reflect on why data is so important for the Firefighters' and Police Pension Schemes.



Our hosts for the day were Phil Wells, Assistant Chief Officer, Bedfordshire Police and Gavin Chambers, Assistant Chief Officer, Bedfordshire Fire.

The day was split into four interactive panel sessions and a workshop. The sessions were:

- Successful Project Implementation.
- Engaging members after dashboards.
- Cost of the Scheme.
- Owning the narrative to make strategic decisions.

The audience first heard from Clair Alcock, Head of Police Pensions, NPCC, who spoke about successful project implementation on the imminent McCloud exercise.



Jo Darbyshire, Managing Director, LPPA, then held our first panel of the day. Her panellists were Taylor Brightwell-Smith, Pensions Consultant, GAD, Leanne Ferreira, Project Specialist, XPS and Helen Scargill, Client Relationship Manager, West Yorkshire Pension Fund. The panel were asked questions to share their knowledge, experience, and concerns over the McCloud Data exercise.



Delegates both in person and virtually took part in a workshop to discuss: How FRAs were ensuring the quality of data to be provided to their administrators? How had their experience been so far, including any unexpected challenges and how had they overcome them? What their lessons learnt so far had been?

We then welcomed Andrew Lowe, Co-Chair of PASA Dashboard Committee, ITM, who gave a presentation on engaging members after dashboards, before joining our second panel, chaired by Chris Connelly, Chief Strategy Officer, Heywoods Pension

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Technologies, and the other panellists Graeme Hall, Operations Manager, XPS, and Paul Turpin, Pensions Advisor, Police Federation.



The afternoon session was opened by James Allen, First Actuarial and Robert Fornear, GAD, who gave an insightful overview of the valuation process, including calculations, assumptions, and outcomes. Not the easiest of sessions for them following lunch, but I think it would be fair to say that they kept us all engaged and provided a very useful session.



The final session of the day was delivered by John Simmonds, Principle, CEM Benchmarking. John provided a useful session on benchmarking before joining our final panel of the day, chaired by Jo Donnelly, Head of Pensions, LGA, and other panellists Jennifer Atthey, Senior Manager, Isio, Alison Murray, Partner, Aon and Jo Darbyshire, Managing Director LPPA. Jo was able to share LPPA's experience of using CEM Benchmarking's services, and what they use the outcomes for. Alison and Jennifer were able to share the barriers that they had both experienced when

collecting data to provide separately the Fire and Police Scheme Advisory Boards with a report on the Cost of the Scheme



View the presentation [slide decks from the data event held on 17 May 2023](#)

ACTION: For FRAs to view the slides and consider data more strategically now and in the future.

FPS coffee mornings

Our MS Teams coffee mornings are continuing on a regular basis. 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:

[23 May 2023 – Data Conference – Workshop Feedback](#)

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

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Legislation

Acts

[Pensions Dashboards \(Prohibition of Indemnification\) Act 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](#)
- [LGPS Regulations and Guidance](#)
- [LGPS member site](#)
- [Scottish Public Pensions Agency - Firefighters](#)
- [Welsh Government Fire circulars](#)

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FPS Bulletin 70 – June 2023

Welcome to issue 70 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 July 2023
FPS Communications Working Group	27 July 2023
SAB	14 September 2023

Event	Date
FPS Technical Working Group	19 September 2023
Fire AGM-save the date	19-20 September 2023
SAB	14 December 2023

Actions arising

[Consultation on the retained Firefighters' Pensions: Proposed changes to the Firefighters' Pension Scheme \(England\) 2006](#): FRAs and administrators to familiarise themselves with the LGA's response, for information ahead of the Home Office's response to the consultation.

[Consultation on The Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) \(No.2\) Regulations 2023](#): FRAs and administrators to familiarise themselves with the LGA's response, for information ahead of the HMRC's response to the consultation.

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

[Firefighters Pay Scales](#): FRAs to make themselves familiar with the pay scales available ahead of the Special members FPS 2006 (Matthews) remedy exercise to commence in October 2023.

[Home Office collection of FPS forecasts for 2023-24 to 2028-29](#): FRAs should start preparing to collate the necessary information (which is similar to that provided last year) from your records so that FRAs are well prepared, bearing in mind that some staff will be on summer leave.

[Consultation on the retained Firefighters' Pensions: Proposed changes to the Firefighters' Pension Scheme \(England\) 2006](#): FRAs and administrators to familiarise themselves with the SAB's response, for information ahead of the Home Office's response to the consultation.

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[Consultation on The Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) \(No.2\) Regulations 2023](#): FRAs and administrators to

familiarise themselves with the SAB's response, for information ahead of the HMRC's response to the consultation.

[Added Years Factsheet](#): FRAs and Administrators to ensure they are using the updated version on their websites.

[Government Actuary's Department \(GAD\): Data Projects and Long-Term Strategy](#):

FRAs are advised to read GAD's write up of the event and their broader focus on data

[Remedy readiness self-assessment tool](#): Scheme managers to complete the self-assessment tool and report back to their senior teams and local pensions boards.

[Data Conference Q and As](#): Pension Dashboards: FRAs and administrators may wish to review the Q and As for information.

[Remedy member examples by GAD](#): FRAs and administrators should read these with reference to slide 15 from the coffee morning of 26 January 2023.

FPS

[Consultation on the retained Firefighters' Pensions: Proposed changes to the Firefighters' Pension Scheme \(England\) 2006](#)

In [FPS Bulletin 68 – April 2023](#) we informed you that the above consultation had been launched. The LGA has responded to the consultation and our response is available on the [Consultations section](#) of the Firefighters' Pension Schemes Regulations and Guidance website.

ACTION: FRAs and administrators to familiarise themselves with the response, for information ahead of the Home Office's response to the consultation.

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[Consultation on The Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) \(No.2\) Regulations 2023](#)

In [FPS Bulletin 69 – May 2023](#) we informed you that the above consultation had been launched. The LGA has responded to the consultation and our response is available on the [Consultations section](#) of the Firefighters' Pension Schemes Regulations and Guidance website.

ACTION: FRAs and administrators to familiarise themselves with the response, for information ahead of HMRC's response to the consultation.

[Data Collection for 2015 remedy](#)

In [FPS Bulletin 44 – April 2021](#) and [FPS Bulletin 66 – February 2023](#) we advised that remedy data collection tools had been developed with the assistance of software suppliers and the Fire Communications Working Group to help FRAs to collect the relevant data needed to prepare for the 2015 remedy exercise.

In [FPS Bulletin 69 – May 2023](#) we covered the Fire and Police data conference event and the workshop feedback coffee morning, which both raised concerns by administrators and software suppliers that not all FRAs had been in a position to provide the relevant data.

There are no assumptions made for missing data within the Police and Firefighters' Pension Schemes (Amendment) Regulations 2023 and FRAs should be near completion of the collection of this data. It is imperative that for administrators to be able to commence the remedy options exercise in October 2023, that they receive this data in good time.

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](#)

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

Firefighter Pay Scales

With the help of LGA Workforce colleagues and the Fire Brigade Union, we have been able to locate pay scales going back to 1962. These have been added to [Firefighter Pay Scales](#) page on the member restricted area on the Firefighters' Regulations and Guidance website.

ACTION: FRAs to make themselves familiar with the pay scales available ahead of the Special members FPS 2006 (Matthews) remedy exercise to commence in October 2023.

Home Office collection of FPS forecasts for 2023-24 to 2028-29

On 21 June 2023, the Home Office emailed all FRAs in England to give notice that they will shortly be writing to formally request submission of pension income/expenditure forecasts for the period 2023-24 to 2028-29 via the online DELTA system.

The deadline for submissions is **Friday 25 August 2023**.

The Home Office will set out the centrally prescribed assumptions that FRAs should apply when calculating their forecasts; and what other considerations they will need to factor in.

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

ACTION: FRAs should start preparing for collating the necessary information (which is similar to that provided last year) from their records so that they are well prepared, bearing in mind that some staff will be on summer leave.

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Added Years Factsheet

In [FPS Bulletin 67 – March 2023](#) we confirmed that all relevant thresholds and rate changes for 2023 were available in the [FPS annual update 2023](#).

We have updated the Added Years Factsheet to include the rate for 2023. You can find this on the [factsheet page](#) of the Firefighters Pensions Regulations and Guidance website.

ACTION: FRAs and Administrators to ensure they are using the updated version on their websites.

Government Actuary's Department (GAD): Data Projects and Long-Term Strategy

In [FPS Bulletin 69 – May 2023](#) we provided an overview of the Fire and Police Data Conference which took place on 17 May 2023.

We reflected on the importance of data for setting long term strategy about the management of pensions and ultimately supporting FRAs. GAD have now published [a news feature](#) reflecting on the event as well as covering a broader focus on data generally.

In the article GAD refers to a blog they have written about Pensions Dashboards, where they compared the matching process to a game of Guess Who. They then referenced pensions administration projects to another board game that I am sure we are all aware of where they urge the bankers (scheme managers) to invest time in the game to prioritise the experience of the players (the members) and provide an exceptional service.

ACTION: FRAs are advised to read GAD's write up of the event and their broader focus on data.

Remedy readiness self-assessment tool

To help scheme managers and pension boards reflect on their own readiness for remedy we have made available (with the help from our NPCC colleagues) a [remedy self-assessment tool](#) which can be found on the Retrospective Remedy page of the

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FPS Regulations and Guidance website. This tool is designed to assist you in assessing whether you have the necessary preparation in place for remedy and whether there are any potential gaps which need addressing.

This is purely for your own use to inform you and your senior team of your readiness for remedy. There is no requirement to return the results of this self-assessment tool to the LGA.

If, after completing the survey, you wish to seek advice or further reassurance, please contact bluelightpensions@local.gov.uk in the first instance.

ACTION: Scheme managers to complete the self-assessment tool and report back to their senior teams and local pensions boards on the results.

Data Conference Q&As – Pensions Dashboards

As mentioned above we provided an overview of the Police and Fire Data Conference event which took place on 17 May 2023 in last month's bulletin.

We have since sought answers to the outstanding questions that were asked on Pensions Dashboards and have put together a Q&A document and you can view this on the [Data conference page](#) on the Firefighters' Regulations and Guidance website.

ACTION: FRAs and administrators may wish to review the Q and As for information.

Remedy member examples by GAD

In [FPS Bulletin 65 – January 2023](#) we covered our Coffee Morning of [26 January 2023 – HMT Remedy Directions](#). Additional resource on interest and member contributions has been created by GAD and has been added to the [Retrospective Remedy page](#) of the Firefighters Pension Regulations and guidance website.

ACTION: FRAs and administrators should read these with reference to slide 15 from the coffee morning of 26 January 2023:

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

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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:

- Injury Pension – whether Personal Independence Payment (PIP), which has replaced Disability Living Allowance should be deducted from an Injury Allowance. Page 56.
- Ill Health retirement review – when to cease paying a higher tier benefit. Page 106.

FPS England SAB updates

SAB meeting 8 June 2023

The Scheme Advisory Board (SAB) last met on 8 June 2023 and the meeting covered the following areas:

- First Actuarial SCAPE discount rate update
- Home Office retrospective remedy consultation
- Home Office Matthews second options exercise consultation

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

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

SAB response to the Consultation on retained Firefighters' Pensions: Proposed changes to the Firefighters' Pension Scheme (England) 2006

In [FPS Bulletin 68 – April 2023](#) we informed you that the above consultation had been launched. The Scheme Advisory Board has responded to the consultation and the response is available on the [Consultations section](#) of the Firefighters' Pensions SAB (England) website.

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ACTION: FRAs and administrators to familiarise themselves with the response, for information ahead of the Home Office’s response to the consultation.

[SAB response to HMRC Consultation on The Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) \(No.2\) Regulations 2023.](#)

In [FPS Bulletin 69 – May 2023](#) we informed you that the above consultation had been launched. The Scheme Advisory Board has responded to the consultation and the response is available on the [Consultations section](#) of the Firefighters’ Pensions SAB (England) website.

ACTION: FRAs and administrators to familiarise themselves with the response, for information ahead of HMRC’s response to the consultation.

Other News and Updates

[McCloud – unions granted right to appeal cost cap mechanism](#)

The Court of Appeal has granted unions permission to appeal against the recent High Court judgement over the government’s proposed method of paying for costs incurred by the McCloud ruling in public sector schemes. See [FPS Bulletin 67 – March 2023](#) for more information.

[Pensions Dashboard Programme](#)

On 8 June 2023, a [Ministerial Statement](#) was made to announce that as part of the reset of the Pensions Dashboard Programme, amending legislation will be laid to amend the Pensions Dashboard Regulations 2022.

On 9 June 2023 the Department for Work and Pensions (DWP) laid draft [Pensions Dashboards \(Amendment\) Regulations 2023](#).

The amending regulations remove the phased staging timeline, replacing it with a single connection deadline of 31 October 2026. The regulations will allow the DWP and the Money and Pensions Service (MaPS) to issue guidance setting out a staged connection timeline for individual schemes, to which FRAs must have regard. MaPS aim to collaborate with industry on the guidance later this year.

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The Pension Regulator's (TPR) dashboard blog

On 14 June 2023, TPR published [a blog 'Make time to get your data dashboard-ready'](#).

The blog encourages pension schemes to continue working on their data to ensure that it is ready for dashboards. It also sets out what schemes should be considering when doing so.

TPR's response to the delay in the dashboard deadline

Further to the [written ministerial statement](#) on 8 June 2023, giving an update on the dashboard deadline, TPR has amended [its dashboard guidance](#).

TPR expects pension schemes to continue to prepare for dashboards. FRAs should continue engaging with the parties who will support them with their dashboard duties, such as their third-party administrator (if appropriate), software provider, and any other party deemed appropriate, to:

- assess the potential impact of these changes on their scheme and to agree a practical delivery plan
- continue activity on getting to grips with members' data, and
- avoid competing demands on capacity and other resources.

These expectations are reinforced in [TPR's new dashboards content toolkit](#) published on 14 June 2023. The toolkit contains key messages for pension schemes.

Dashboards Values Guidance

The Pensions Administration Association (PASA) has published [guidance](#) designed to provide trustees, managers, sponsors, administrators and providers with “good practice” approaches to providing value data to pensions dashboards.

The guidance is intended for use by both DC and DB schemes and covers 20 topics including possible approaches for dealing with issues such as late retirements, underpins, partial retirements and split normal retirement ages.

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TPO expands network of volunteers

The Pensions Ombudsman ([TPO](#)) is [expanding its network of volunteer advisers](#). It currently has a network of around 200 pension professionals, who in 2022 helped to close 1,390 cases.

If you are interested you can [apply to be a volunteer](#), or email TPO's Network Manager Paul Day at paul.day@pensions-ombudsman.org.uk

Voluntary NI contributions deadline extended

In [a written ministerial statement](#) published on 12 June 2023, the Government announced it was extending the deadline to pay voluntary National Insurance (NI) contributions from 31 July 2023 to 5 April 2025. This applies for tax years 2006/07 to 2017/18.

Paying voluntary NI contributions enables individuals to fill gaps in their NI record to boost their State Pension.

HMRC

Pension Schemes Newsletter 150

On 31 May 2023, [HMRC published pension schemes newsletter 150](#). The newsletter contains articles on relief at source and the Managing Pension Schemes service.

Events

FPS coffee mornings

Our MS Teams coffee mornings are continuing regularly. 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:

[Matthews FRA Calculator](#)

If you do not already receive the meeting invitations and would like to join us, please

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email bluelightpensions@local.gov.uk. Please note that attendance at the coffee mornings is generally restricted to FPS practitioners and managers.

Useful links

- [The Firefighters' Pensions \(England\) Scheme Advisory Board](#)
- [FPS Regulations and Guidance](#)
- [FPS Member](#)
- [Khub Firefighters Pensions Discussion Forum](#)
- [FPS1992 guidance and commentary](#)
- [The Pensions Regulator Public Service Schemes](#)
- [The Pensions Ombudsman](#)
- [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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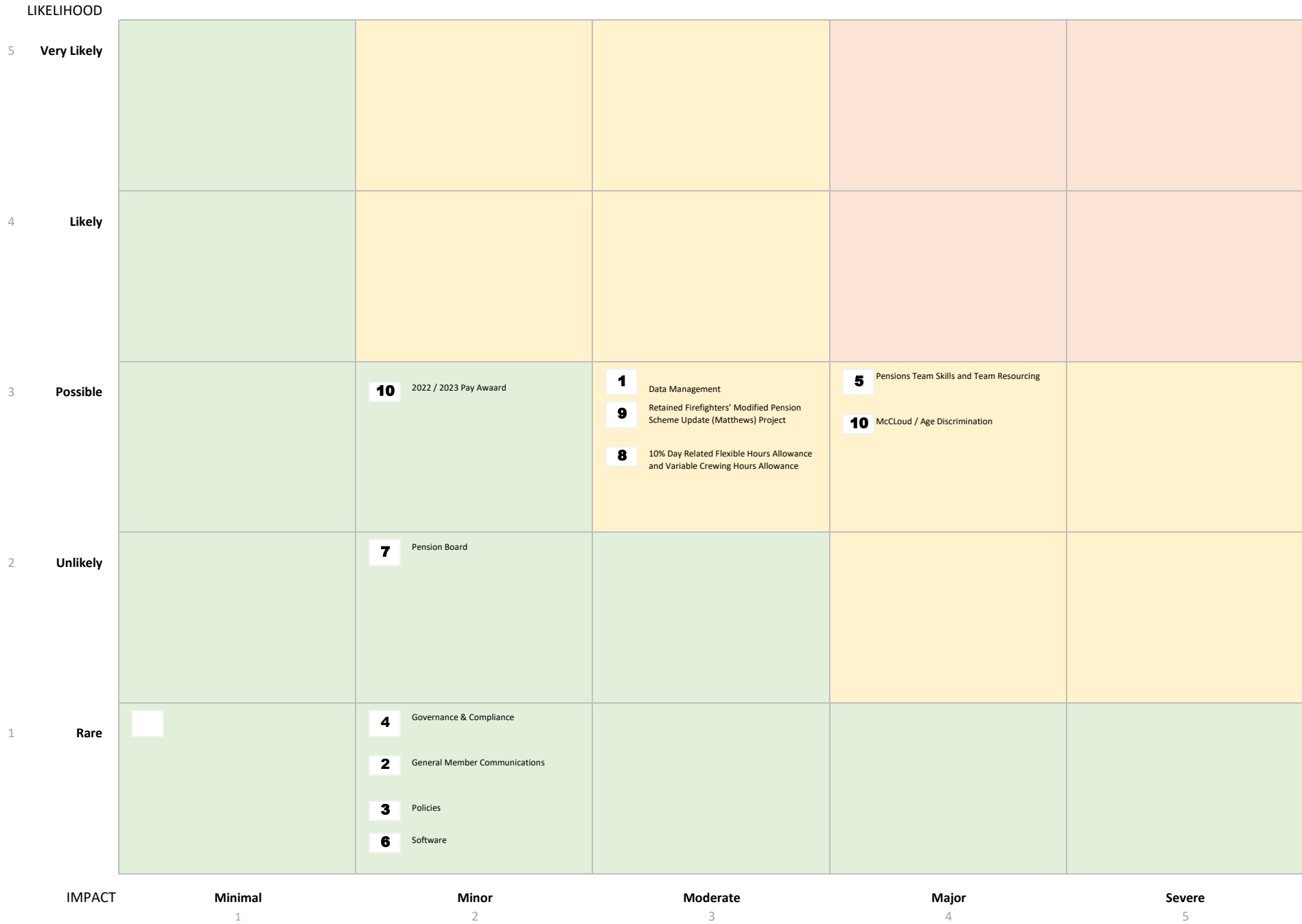
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Pension Team Risk Summary

February 2023

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					
13					
14					
15					
16					

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Risk ID	Risk Title	Risk Area	Risk sub-ID	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	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	Sep-23
1	Data Management		1B	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	Sep-23
2	General Member Communications		2A	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	01/07/2023 the Pension Team suggest this risk is closed
3	Policies		3A	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	Sep-23

Risk ID	Risk Title	Risk Area	Risk sub-ID	Causes	Effect	Risk Owner	Likelihood (1-5)	Impact (1-5)	Overall Score	Key Existing Management Controls	Planned Enhancements to Controls (Actions)	Action by Whom	Target Review Date
4	Governance & Compliance		4A	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	Sep-23
			4B	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	Sep-23
5	Pensions Team Skills and Team Resourcing		5A	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	Sep-23
			5C	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/Unit 4 pay data to be granted to Pensions Team staff	Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Sep-23
6	Software		6A	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 is confirmed as June 2023. 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 system is in place.		Senior Pensions Advisor	Sep-23

Risk ID	Risk Title	Risk Area	Risk sub-ID	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
7	Pension Board		7A	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 12/04/23 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.		Local Firefighter Pension Board	Sep-23

Risk ID	Risk Title	Risk Area	Risk sub-ID	Causes	Effect	Risk Owner	Likelihood (1-5)	Impact (1-5)	Overall Score	Key Existing Management Controls	Planned Enhancements to Controls (Actions)	Action by Whom	Target Review Date
8	10% Day Related Flexible Hours Allowance and Variable Crewing Hours Allowance		8A	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	Sep-23
			8B	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	Sep-23
9	Retained Firefighters' Modified Pension Scheme Update (Matthews) Project		9A	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. 4) Letters have gone out to members who returned an expression of interest form and to those that did not respond. 4) An update from the Home Office and LGA have confirmed the modified scheme will open via the second options exercise in October 2023. The affected members have been notified	1) A dedicated risk register for the Matthews project has been created to horizon scan forthcoming risks associated with this project.	Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Sep-23
			9B	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)SFRS Pension Team and the LGA have responded to the Home Office consultation document. Deadline was 9 June 2023. 3)Administration processes to implement the options exercise to be determined once legislation confirmed 4) The second options exercise opens in October 2023. Communications to members have been sent out.		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Sep-23

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			9C	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. The scheme will reopen in October 2023.	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	Sep-23
			9D	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.	The GAD 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 in-house at the Fire Service.	Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Sep-23
			9E	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	Sep-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	Sep-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	Sep-23

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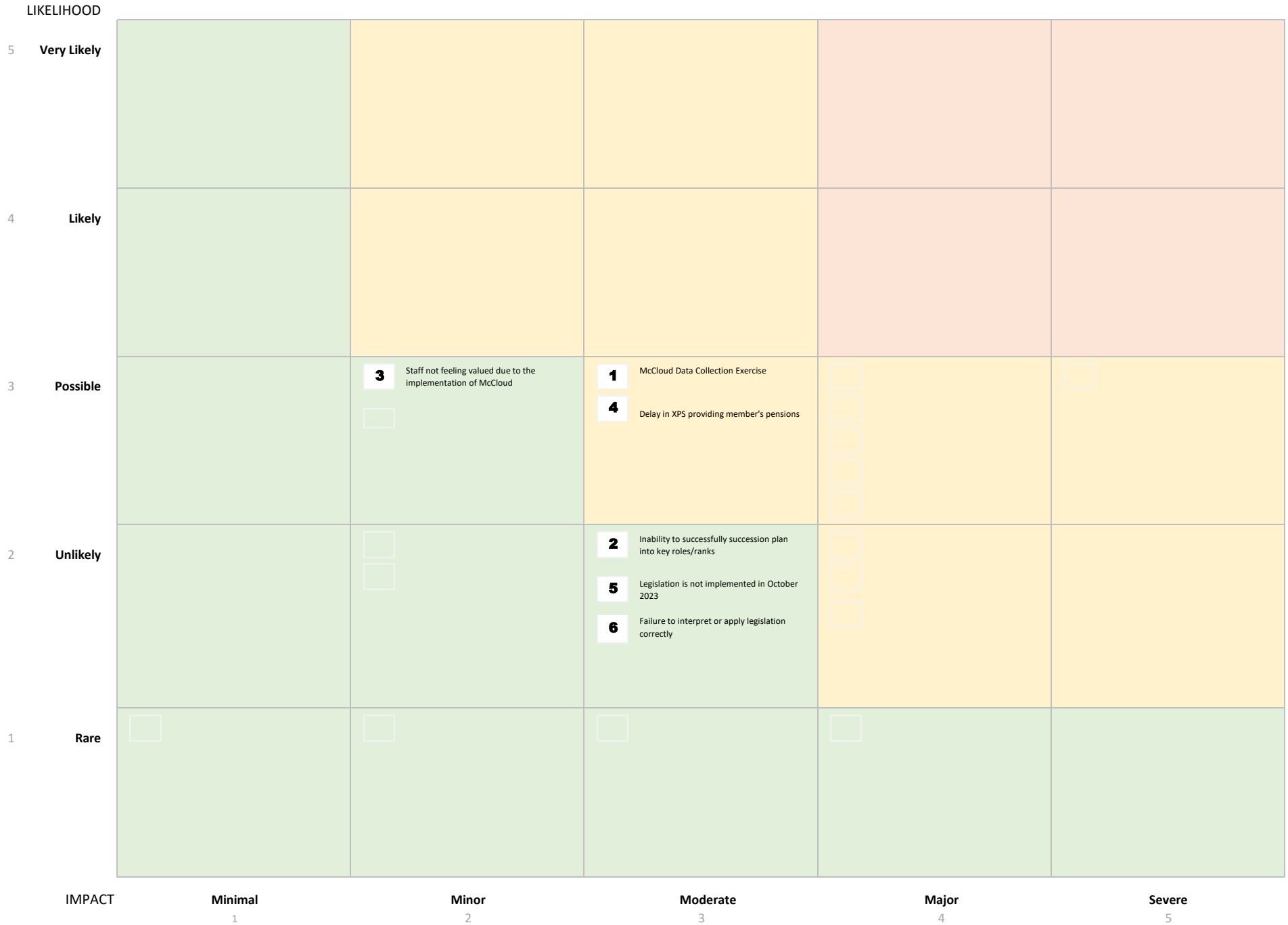
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1	Rare	<10%
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3	Possible	30% to 70%
4	Likely	70% to 90%
5	Very Likely	>90%

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

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Risk ID	Risk Title	Risk Owner	Risk with current mitigation controls in place		
			Likelihood (1-5)	Impact (1-5)	Overall Score
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	Sep-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	Sep-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	Sep-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 IDR.	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	Sep-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	Sep-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 incorrectly.	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	Sep-23

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Retained Firefighters (Matthews) Risk Summary

June 2023

Risk ID	Risk Title	Risk Owner	Risk with current mitigation controls in place		
			Likelihood (1-5)	Impact (1-5)	Overall Score
1	Failure to notify or identify staff eligible to join the Modified Scheme.	Scheme Manager	1	2	2
2	Interaction of Matthews and McCloud legislation.	Scheme Manager	3	2	6
3	Data accuracy.	Scheme Manager	1	2	2
4	Interpretation of Matthews consultation document.	Scheme Manager	1	3	3
5	Legislation is not implemented in October 2023.	Scheme Manager	1	2	2
6	Failure to interpret or apply legislation correctly.	Scheme Manager	1	3	3
7	Unable to determine financial implications of implementing the modified scheme.	Scheme Manager	1	1	1

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1	Failure to notify or identify staff eligible to join the Modified Scheme.	Members will not receive their pension entitlement.		Members who have left the Service and we have no current address on record. Members who have died and Next of Kin (NoK) is not known.	Member / Next of Kin will not receive pensions benefits which they are entitled to.	Scheme Manager	1	2	2	The pensions team have identified members they believe are in scope. A poster to raise awareness has been produced by the Pensions Team and sent to all Station Commanders to display on station boards. Home Office consultation has removed deadline for members to apply for Matthews Remedy. Fire & Rescue Authorities are able to use their discretion to accept applications after 18 months.	Pensions team continue to review their communications plan and communicate with members via different channels. A 'Matthews Second Options' SharePoint page has been drafted and will be added to Pension SharePoint site. Pensions team will liaise with the Fire Brigades Union (FBU) Old Comrades Association (OCA) and National Association of Retirement Firefighters (NARF) in an attempt to try and trace a member's Next of Kin for members who have passed away.	Pensions Support Assistant.	Sep-23
2	Interaction of Matthews and McCloud legislation.	Uncertainty around how the legislation will be implemented. Members not feeling valued due to time taken for implementation of Matthews legislation. Member expectations not being met.		McCloud and Matthews legislation is due to be implemented on the same date. Uncertainty around how this will work in practice.	Members are unhappy with the service received and may raise an IDRPs. Interaction of McCloud and Matthews remedy may result in calculations being conducted incorrectly thus paying members incorrect benefits.	Scheme Manager	3	2	6	The Pensions Team are communicating to members via different channels with the aim of keeping members up to date. Once clarification has been received regarding the interaction of the Matthews and McCloud legislation, updates will be provided to members when deemed necessary. The pensions team have responded to the Home Office's consultation and have provided feedback accordingly.	KPI's are due to be updated by XPS to reflect the new legislation. The Pensions Team continue to work closely with the Local Government Association (LGA) and keep abreast of current advice and guidance via collaborative coffee morning sessions and documentation/press releases.	Pensions Support Assistant.	Sep-23
3	Data accuracy.	Calculations and assumptions necessary for some members backdated service.		Data unlikely to be available for all members' service history.	Members may be unhappy with the assumptions to be used for periods of service where there is no information held on SFRS records.	Scheme Manager	1	2	2	Home Office has provided guidance in the consultation documenting the proposed assumptions to use where data is not available. Members will be able to provide examples of evidence that can be accepted (e.g. P60s). The Pensions Team completed a data collection exercise for the Home Office on SFRS' members affected by the Matthews legislation.	The pensions team continue to work closely with the Local Government Association for any updates or advice regarding how and what assumptions will be used for missing historical data.	Subject Matter Experts & Senior Pensions Advisor.	Sep-23
4	Interpretation of Matthews consultation document.	Eligibility for Matthews remedy.		Proposed Matthews legislation ambiguous regarding which cohorts members qualify for. Within the consultation, the indicative timetable notes that FRAs need to provide a statement of service and cost within 3 months of receiving the expression of interest form.	Members may not be given correct service entitlement. Members may be unhappy that they may not receive the correct service entitlement and subsequently may raise an IDRPs. Three cohorts have been identified within the consultation. Our members fall into cohort 3 (employees who were not given an option to join the first options exercise) The consultation suggests these members are unable to purchase continuous service pre-1 July 2006. Clarification needed from the Home Office that members can be placed in more than one cohort. The Service may not be able to meet the 3 month deadline which means members won't receive a statement of service which means they will	Scheme Manager	1	3	3	The Pensions Team have responded to the consultation voicing concerns over the definition of the different cohorts. The Service have also provided feedback regarding the proposed timeframes FRAs will need to issue a statement of service.	The Pensions Team continue to work closely with the Local Government Association and the wider fire sector for any pertinent updates.	Senior Pensions Advisor.	Sep-23

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5	Legislation is not implemented in October 2023.	Delay in processing member benefits.		Government is unable to implement legislation to their specified deadline.	Members' will be dissatisfied with the delay incurred until they are contacted with their options statements.	Scheme Manager	1	2	2	The Pensions Team are communicating to members via different channels providing updates when the legislation will be enforced to manage members' expectations.	The Pensions Team continue to work closely with the Local Government Association and the wider fire sector for any pertinent updates.	Pensions Team.	Sep-23
6	Failure to interpret or apply legislation correctly.	Member expectations not being met.		Incorrectly processing the Matthews remedy not in line with legislation and/or Home Office expectations. For example, failure to open the second options exercise.	Members may receive incorrect pension entitlement.	Scheme Manager	1	3	3	Preliminary work has been undertaken by the Pensions Team and the Service have also responded to the Home Office's consultation providing feedback.	The Pensions Team continue to work closely with the Local Government Association and the wider fire sector for any pertinent updates.	Senior Pensions Advisor.	Sep-23
7	Unable to determine financial implications of implementing the modified scheme.	Budget		It is unknown at this stage of the financial costs to implement the Modified Scheme. Further risk of fines/compensation etc. if incorrect benefits are awarded due to complexities of interaction between both McCloud and Matthews.	The Service is unable to budget accordingly until further clarification can be provided from the Home Office. The Service may need to pay interest charges on pension arrears owed to members.	Scheme Manager	1	1	1	The Service have allocated monies to cover potential liabilities of implementing the Modified Pension Scheme. Further work to be undertaken.	The pensions team continue to work closely with the Local Government Association and keep abreast of current advice via collaborative coffee mornings.	Senior Pensions Advisor.	Sep-23

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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

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