

Notice of Meeting

Surrey Local Firefighters' Pension Board



Date and Time

Thursday, 8 February
2024
10.30 am

Place

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

Contact

Joss Butler
joss.butler@surreycc.gov.uk

Web:

[Council and
democracy
Surreycc.gov.uk](#)

Twitter:

@SCCdemocracy



Committee/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: 23 NOVEMBER 2023 (Pages 5 - 10)

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

3 DECLARATIONS OF INTEREST

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

Notes:

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

4 QUESTIONS AND PETITIONS

To receive any questions or petitions.

Notes:

1. The deadline for Member's questions is 12.00pm four working days before the meeting (2 February 2024).
2. The deadline for public questions is seven days before the meeting (1 February 2024)
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 11 - 18)

The Board to note the Action and Recommendation Tracker.

6 SCHEME MANAGEMENT UPDATE REPORT (Pages 19 - 24)

The Board has requested an update on Scheme management activities.

7 XPS - SURREY FIRE & RESCUE AUTHORITY PENSION BOARD REPORT (Pages 25 - 44)

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

8 FIRE BULLETINS (Pages 45 - 78)

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 79 - 100)

The Board to consider relevant risk registers.

10 DATE OF THE NEXT MEETING

The next meeting will be on 26 April 2024.

Joanna Killian
Chief Executive
Published: 31 January 2024

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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 10.30 am on 23 November 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, 8 February 2024.

(* present)

Elected Members:

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

In attendance

Benedict Mulliss (substitute Member)

31/23 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS [Item 1]

No apologies for absence were received.

32/23 MINUTES FROM THE PREVIOUS MEETING: 20 JULY 2023 [Item 2]

The minutes from the meeting on 20 July 2023 were agreed as an accurate record of the meeting.

33/23 DECLARATIONS OF INTEREST [Item 3]

None.

34/23 QUESTIONS AND PETITIONS [Item 4]

There were none.

35/23 SURREY FIREFIGHTERS' PENSION BOARD ACTION AND RECOMMENDATION TRACKER [Item 5]

Witnesses:

Sally Wilson, Scheme Manager

Key points raised during the discussion:

1. The Chairman introduced the Action and Recommendation Tracker. The following comments were raised:

A11/22 - Pension Scams – The Scheme Manager suggested that the action be closed which was agreed.

A7/23 - Annual Benefit Statements – The Scheme Manager stated that the Annual Benefit Statements were not published by the deadline due to changes in the payroll software. XPS were due to make the statements available online by the end of November 2023. A member of the Board stated that he understood that officer annual leave within the pension team also caused issues and asked what insurances were in place to prevent future similar issues. The Scheme Manager stated that she was not aware that the publication was impacted by resources however noted that a risk register item on resources was due to be considered within Part 2 of the meeting's agenda.

Closed actions – the Board agreed to close the items noted within the 'completed actions' section of the tracker.

Actions/ further information to be provided:

None.

Resolved:

The Board noted the Actions and Recommendations Tracker.

36/23 SCHEME MANAGEMENT UPDATE REPORT [Item 6]

Witnesses:

Sally Wilson, Scheme Manager
Janine May, Pensions Support Assistant

Key points raised during the discussion:

1. The Senior Pensions Advisor introduced the report and highlighted the following points:
 - a. In regard to the McCloud - Age Discrimination Remedy, Members noted that the Government published their response to the consultation document in July 2023 and that the legislation came into force on 1 October 2023.
 - b. In regard to the McCloud - Age Discrimination Remedy, Members noted that a calculator had been developed by the Government Actuaries Department (GAD) which was released to Fire and Rescue Authorities (FRAs) at the end of August 2023. A Member suggested that information on the GAD calculator and contribution adjustment was made available to scheme members on the SharePoint site.
 - c. Noted details around the 10% Pensionable Allowance as outlined in the report.
 - d. Noted details around the Matthews - Retained Scheme – On-Call Access as outlined in the report. Members noted that guidance had been provided by the Local Government Authority on how administrative cases where scheme members were affected by both Matthews and McCloud.
 - e. Noted that work around the Guaranteed Minimum Pension (GMP) Rectification was ongoing.
 - f. Provided detail on the Pre-Retirement Courses as outlined in the report. A member of the Board stated that they felt the courses were very helpful and thanks the team for their work.

g. Noted details on communications as outlined in the report.

2. The Chairman thanked officers for their report.

Actions/ further information to be provided:

None.

Resolved:

The Board noted the report.

37/23 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 introduced the item and provided a summary of its content. The following details were noted:
 - a. Details related to regulations and guidance as outlined in the report.
 - b. That XPS Administration had achieved accreditation against the PASA Pensions Administration Standards.
 - c. Detail on the use of tracing service to confirm addresses for those members approaching, or beyond, Normal Retirement Age
 - d. Details on Conditional Data Testing, National Fraud Initiative and the analysis of late tasks
 - e. Noted data related to Member Self-Service as noted within the report.
 - f. Presented the updated common data as noted within the report.
 - g. Noted the data included within the Membership tables.
 - h. Noted the completed cases overview.
2. In regard to completed cases, a member noted that the percentage of completed cases for August and September 2023 were down to 70% and 75% and asked what assurances could be given that it would increase going forward. The representative from XPS stated that, due to the additional work caused by the implementation of remedies, XPS were unable to give assurances however resource and training had been increased significantly within the team. Following this, the Member noted that the general enquiry percentage had decreased in recent months and asked that this be monitored.

Actions/ further information to be provided:

None.

Resolved:

The Board noted the report.

38/23 FIRE BULLETINS [Item 8]

Witnesses:

Sally Wilson, Scheme Manager

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.

39/23 RISK REGISTERS [Item 9]**Witnesses:**

Sally Wilson, Assistant Chief Fire Officer
Janine May, Pensions Support Assistant

Key points raised during the discussion:

1. The Senior Pensions Advisor introduced the report and provided a brief overview.
2. The Scheme Manager highlighted the risks identified to be closed within the Pensions Team Risk Register. The Board agreed to close the risks.

Actions/ further information to be provided:

None.

Resolved:

The Board noted the risk register.

40/23 EXCLUSION OF THE PUBLIC [Item 10]**Resolved:**

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

41/23 RISK REGISTERS [Item 11]

This item was considered within Part 2.

42/23 DATE OF THE NEXT MEETING [Item 12]

The Board noted that the date of the next meeting was 8 February 2024.

Meeting ended at: 11.30 am

Chairman

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**SURREY LOCAL FIREFIGHTERS' PENSION BOARD
ACTIONS AND RECOMMENDATIONS TRACKER**

The actions and recommendations tracker allows Board Members to monitor responses, actions and outcomes against their recommendations or requests for further actions. The tracker is updated following each Board. Once an action has been completed, it will be shaded out to indicate that it will be removed from the tracker at the next meeting.

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
17 January 2020 A1/20	Matthews / Retained Project Administration Update (1 September 2019 - 31 December 2019)	Implement of modified pension scheme arrangements	Scheme Manager	<p>April 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>November 2023: The legislation has been finalised and came into force on 1 October 2023. The LGA have provided draft communications to send to members and the first phase of the GAD calculator will be released to FRAs in November 2023. Letters including Expression of Interest forms were issued to members on 1 November 2023.</p>	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				February 2024: FRAs have a legal duty to contact eligible members. The SFRS pension team have employed the services of ITM, a mortality and tracing specialist, to reach out to a number of individuals who have not yet responded.	
30 April 2020 A16/20 & A1/22 (combined) 13 January 2022 A1/22	10% Project Action Tracker and Risk Register	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. B) A risk to be added to the Risk Register concerning Pensionable Pay - particularly in relation to Duty Systems. Regarding the 10% pensionable pay, the Scheme Manager agreed to circulate details on the communication timeline for each priority group to members of the Board.	Scheme Manager	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. 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. 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. November 2023: The Pension Team have revisited the Priority group data as there has been some member movement between groups since the project was paused. Letters have been drafted and calculations	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				<p>have been completed for Priority Group 5 (active members).</p> <p>February 2024: The Pensions Team continues to be under-resourced, so Matthews and McCloud work continues to take priority. However, it is hoped that work can recommence on this project in the next few months</p>	
<p>30 April 2020 A20/20 (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>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.</p>	<p>Ongoing</p>

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				<p>November 2023: Weightmans have reviewed the benefit specification and are liaising with Mercers with a view to final sign off.</p> <p>February 2024: There are a few outstanding queries with XPS to resolve before final sign off.</p>	
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>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> <p>February 2024: XPS to provide update on progress of the project</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	Scheme Manager	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	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
	XPS – Surrey Fire & Rescue Pension Board Report	circulated when needed and potentially reducing the risk of losing contact when members move to a different address. The Scheme Manager agreed to consider this and report back to the Board.		member's self-service portal continues to increase which provides a further platform to gain information from members. February 2024: No update on this area due to the other tasks within the team which have taken priority.	
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: the representative from XPS explained that they had not received a response from the scheme member who was believed to be overseas. The Chairman asked that XPS continue with their efforts to contact the scheme member. February 2024: XPS to include this information in their report to the Board and/or provide a verbal update 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: the representative from XPS confirmed that the longest delay was 55 days however the case had been incorrectly logged due to an administrative oversight and was not a normal occurrence. The Chairman asked that data on the longest delay be included in future reports from XPS.	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
				February 2024: XPS to include this information in their report to the Board and provide a verbal update at the meeting.	
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 the scheduled implementation in October 2023.	XPS / Scheme Manager	<p>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.</p> <p>The Chairman noted that orders had recently been laid before parliament and asked that Members were briefed on any issues within the next few weeks following the July meeting of the Board.</p> <p>November 2023: The legislation came into force on 1 October 2023. The Pension Team are working on a further data collection exercise to extract member historical tax information from payroll records. This is needed to input in the GAD calculator. There have been 3 retirements, in October, in scope of remedy and their benefits have been processed and paid on time, in accordance with the Remedy legislation.</p> <p>February 2024: The pension team continue to liaise with XPS to ensure all relevant information is available to prepare Remediabale Service Statements to each cohort of members.</p>	Ongoing
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	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	Ongoing

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
		annual Benefit statements by 31 August 2023 and to ensure member records and projections are correct.		<p>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.</p> <p>November 2023: Year-end data and pay award data was submitted to XPS on 7 August 2023. However, Annual Benefit Statements were not published by the deadline of 31.8.23, due to the introduction of new payroll software and associated issues with extracting the relevant pay data. This incident has been assessed in accordance with the Pension Regulator guidelines and will be recorded, by the Pension Team, as an internal breach of responsibilities. The ABS's are expected to be published by XPS by the end of November 2023.</p> <p>February 2024: The Annual Benefit Statements were not published by the end of November 2023. This was due to challenges in extracting the correct pay data following implementation of new payroll software as well as ensuring the two back dated pay awards were allocated correctly. The Pension Team worked collectively with payroll to resolve the errors and the year end data was submitted to XPS on 14 January 2024.</p>	

COMPLETED RECOMMENDATIONS/REFERRALS/ACTIONS – TO BE DELETED

Date of meeting and reference	Item	Recommendations/ Actions	To	Response	Progress
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: The representative from XPS provided Members with an overview of scams related to members of a pension scheme transferring their benefits to another scheme and being subject to high unauthorised payment charges. Members noted some examples of scams, and that XPS staff attended annual refresher training on pension scams and the processes in place to address suspicious activity.</p> <p>November 2023 – the Board agreed to close this action.</p>	Closed



Surrey Local Firefighters' Pension Board 8 February 2024

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 queries raised by XPS in relation to the data collection exercise, have now been addressed and the data is currently being interrogated by XPS before final upload onto their system.

2.2 The legislation come into force on 1 October 2023. Members retiring since 1 October have received retirement options including the remedy.

2.3 Warm-up letters have been issued to each cohort of members to advise when they can expect to receive their Remediable Service Statements. Letters have also been sent to members falling within the 'Contingent decisions' cohort to provide information on how the Age discrimination legislation may affect them. The SFRS Pensions SharePoint site continues to be updated as a source of reference for members.

2.4 The Pension Team continue to work on the GAD data collection exercise to collate and report the GAD calculator data to XPS, for each cohort of membership, in accordance with the RSS timetable.

10% Pensionable Allowance

2.5 Now that the data collection exercise has been completed, the Pension Team have revisited the member data for this exercise to identify member movements within priority groups. The next groups of members to be contacted are Priority Group Five, (current active members). The Pension Team have also reassessed the data to identify members retiring in the next 12 months to give this cohort priority. The calculations have been completed and checked for these members and letters are in the process of being drafted.

Matthews - Retained Scheme – On-Call Access

2.6 The Government published their response to the consultation document, in September 2023, and the legislation came into force on 1 October 2023.

2.7 The Government Actuaries Department (GAD) has produced a calculator for use by FRAs. This must be used by FRAs to calculate the cost to each member of purchasing past membership in the Modified scheme. The first phase of the calculator was released in November 2023. The Pension Team issued the Expression of Interest packs to members on 1 November 2023. As of January 2024, the SFRS Pension Team have received seven returned letters from the last known address of some individuals. There is also some concern that the Pension Team have only received a response from about a third of individuals contacted. This is approximately 30% of individuals. The legislation stipulates that 'reasonable endeavours' must be made to contact all individuals in scope for the Second Options exercise. As a 'nil' response does not substantiate proof of contact, the Pension Team have submitted a business case regarding their intention to appoint a specialist 'member tracing' service 'ITM', to ensure communications are being sent to the correct addresses. The business case will be reviewed at the Workforce Working Group on 25 January 2024.

2.8 The Home Office and GAD have confirmed that they will require FRAs to report quarterly statistics regarding the number of cases being worked on in relation the Matthews second options exercise.

Annual Benefit Statements

2.9 There were a number of errors in the data submitted to XPS. These errors were partly due to a double backdated pay award and the introduction of a new payroll system. This has caused a delay in the publication of the Annual Benefit Statements. The Pension Team and payroll have worked collectively to resolve these errors, and revised year end data was submitted to XPS on 4 January 2024. This has been reported to the Pensions Regulator. XPS have not yet confirmed when the ABS statements will be available and sent to members, however this is being followed up accordingly.

2.10 In recognition of the significant impact of Remedy on the administration of pensions, the legislative deadline for issuing 2022/2023 Pension Saving Statements for Annual Allowance purposes to those affected by the McCloud/Sargeant Ruling, has been extended to 6 October 2024 by HMRC. In addition, the deadline to elect for Scheme Pays has also been extended, to 31 July 2025 by HMRC.

Anyone impacted by the McCloud remedy, who has breached the annual allowance for 2022/23, will be subject to a new separate reporting framework which will be created by HMRC especially for the McCloud/2015 remedy.

2.11 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) Rectification

2.12 The rectification project is due to be completed by the end of February 2024. Mercers have raised a few outstanding queries with XPS which need to be resolved before final sign off.

Pension Dashboard

2.13 The Pensions Dashboard (Amendment) Regulations 2023 confirmed that the connection deadline has been extended to 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. It is currently expected that the staging date for Public Service Pension Schemes will be in the summer of 2025.

Pre-Retirement Course

2.14 Following positive feedback from the first two courses held by Affinity Connect in 2023, the Pension Team have arranged two further course dates, in April 2024 and September 2024. This has been publicised in the staff newsletter and full details are available on the Pensions Information SharePoint site.

Training

2.15 A training need has been identified for newer members of the Pension Team as well as interested Board members. In recognition of this, the Pension Team have prepared a business case to appoint a specialist training company, known as 'Isio'. Isio are offering tailored sessions specific to the Firefighters' Pension Schemes. The sessions will cover the basics of the pension schemes, the McCloud/Sargeant age discrimination remedy and Matthews Second Options exercise, as well as pensions tax for higher earners. Similar courses have been procured and run successfully in the Police sector.

Pension Team Resourcing

2.16 The Pensions Team are pleased to report the role of Senior Pension Adviser has now been confirmed and the new member will join the team at the end of February 2024.

Communications

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

- **New Starter information Slide Deck:** A new starter information slide deck has been created for use by a member of the Service during new recruit training. The Pensions Project Officer attended Wray Park to present the slide deck to new recruits in December 2023.

- **Late publication of annual benefit statements News Item:** An article was published in SFRS news on 24 November 2023 to inform members of delay in publishing annual benefit statements.
- **Contingent decisions News Item:** An article was published in SFRS news on 8 December 2023 alerting the contingent decision claim process to employees who had previously Opted out of the Pension Scheme that they be potentially in scope for the McCloud remedy,
- **Matthews Second Options Exercise News Item:** An article was published in SFRS news on 22 December 2023 to inform members of updates to FPS website to include FAQs and member guidance to explain options.
- **Pre-Retirement course News Item:** An article was published in SFRS news on 5 January 2024 advising members of new dates for 2024 for the online pre-retirement courses run by affinity connect.
- **McCloud Remedy contingent decision Letters:** Letters/emails were issued to eligible members on 18 December 2023, with details of the contingent decision process, if they had previously opted out of the Pension Scheme.

2.18 Since the Pensions SharePoint site was shared with members of the Service, there has been a total of 5004 visits to the site. The below table shows a summary of site traffic since 1 August 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 November 2023 – 8 January 2024	5728	727	210	1 minute 38 seconds

An analysis of the data shows the most popular pages visited in the last period, were:

- XPS administration contact page
- Matthews Second Options Exercise
- Frequently Asked Questions.

The 'News items' also continue to attract a lot of site traffic. Most recent popular items include the 'Matthews Second Options Exercise update' and 'Age Discrimination Remedy update'.

Training from the LGA

2.19 The LGA are looking to change the way that they deliver Local Pension Board (LPB) training in 2024 to allow them to provide more dynamic and engaging sessions. The training is likely to take place every quarter and will be open to new and existing LPB members, and

any other individuals who are involved in the governance of their LPB. The LGA are in the process of finalising the agenda and more information will follow shortly.

2.20 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. Ongoing 4. Completed
McCloud IDF	<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. N/A as IDF did not proceed.
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. Underway 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. Completed 3. Ongoing

Risk Management

2.21 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 – Q3

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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

LGA issued Bulletin 70

Bulletin 70 covered many topics, most with actions arising; see below: -

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 to the consultation ahead of the Home Office's response.

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 to the consultation ahead of the HMRC's response.

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 to implement remedy from 1 October 2023.

Firefighters Pay Scales:

FRAs to familiarise themselves with the pay scales available ahead of the Special Members FPS 2006 (Matthews) remedy exercise to commence in October 2023.

Pay scales have been located going back to 1962. These have been added to the Firefighter Pay Scales page on the member-restricted area on the Firefighters' Regulations and Guidance website.

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

FRAs should start preparing to collate the necessary information; this is similar to that provided last year.

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 to the consultation ahead of the Home Office's response.

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 to the consultation ahead of the HMRC's response.

Added Years Factsheet:

FRAs and Administrators to ensure they are using the updated version on their websites. LGA has updated the Added Years Factsheet to include the rate for 2023; this can be found on the factsheet page of the Firefighters Pensions Regulations and Guidance website.

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 must complete the self-assessment tool and report to their senior teams and local pensions boards.

Data Conference Q & and Pension Dashboards:

FRAs and administrators may review the Q & A's 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.

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

As a third-party administrator, XPS responded on 16 June 2023.

July 2023

LGA issued Bulletin 71

Bulletin 71 covered many topics most with actions arising, see below: -

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

FRAs should ensure that they are using the correct CPI rates in their forecasts and ensure that they meet the submission deadline.

Age discrimination remedy – retrospective remedy:

FRA and administrators to read the response and ensure that they are working to be ready for the regulations' implementation on 1 October 2023.

Age discrimination remedy – Contributions Calculator inputs:

FRA and administrators may wish to familiarise themselves with the draft inputs, so that they can ensure they are holding all the relevant data.

Age discrimination remedy - Interest and Tax:

FRA and administrators should note this position, to ensure that they act accordingly when carrying out remedy.

Age discrimination remedy – Pension scams:

Administrators and/or FRAs to add the suggested wording to the pension webpages.

Age discrimination remedy – warm up letters:

FRAs/administrators should use these to communicate with their members ahead of October 2023.

Age discrimination remedy – Ill-Health re-assessment member outcome letters:

Once the IQMP has provided their determination and FRAs have considered this and agree with the outcome, FRAs should send these using the relevant member outcome letter.

Firefighters' Pension Scheme Adjustment in Respect of 2021 and 2022 Revaluation:

FRAs and administrators to make themselves aware of this issue and start scoping the work involved.

Government Actuary Department (GAD) – updated factors:

FRAs and administrators to ensure that they are using the revised factors from the relevant implementation dates.

Member benefit illustrations – FPS Northern Ireland:

FRAs and administrators to make their members aware of the benefit illustrators, where applicable.

Pension entitlements for retained Firefighters 2023 – FPS Wales:

FRAs and administrators to review the consultation and respond accordingly.

Abolishing the pensions lifetime allowance:

FRAs and administrators to make themselves aware of the measures involved and consider whether they wish to respond to the consultation.

Member remedy tax calculator:

Scheme managers should register on the Secure Exchange Data Service ahead of the remedy exercise and delegate access accordingly

AUGUST 2023

LGA issued Bulletin 72

Bulletin 72 covered many topics most with actions arising, see below: -

Age Discrimination Remedy – Warm up letters:

FRAs/administrators should use these to communicate with their members ahead of October 2023.

Age Discrimination Remedy – Remediable Service Statements:

Administrators are recommended to use the template covering letter, where the RSS is not yet available with existing retirement option letters offering the member a choice of legacy and reformed scheme benefits.

Age Discrimination Remedy – Remedy tax and contributions:

FRA and administrators should familiarise themselves with the draft inputs, so that they can ensure they are holding all the relevant data.

The Pension Regulator – Scheme Return:

FRA to ensure that their scheme return contact details are up to date.

September 2023

XPS attended the FPS Technical Working Group on 19 September 2023

XPS attended the Firefighters' Annual Conference Day two 20 September 2023

LGA issued Bulletin 73

Bulletin 73 covered many topics most with actions arising, see below: -

Firefighters' Pensions Schemes (England) (Amendment) Order 2023:

FRA and administrators to familiarise themselves of the consultation response ahead of the Matthews second options exercise.

Disclosure requirements:

FRA to ensure they comply with disclosure requirements by ensuring they send the appropriate letter to Sargeant and Matthews eligible members no later than 31 December 2023.

Age Discrimination Remedy – terminology:

FRA and administrators to note that whilst there is different terminology it all relates to the same exercise.

The Matthews second exercise can also be referred to as 'remedy' but relates to a different exercise.

Age Discrimination Remedy – GAD Tax and Contribution Calculator:

FRA and administrators to familiarise themselves with the calculator and carry out testing against their data and feedback any issues to GAD and LGA.

Age Discrimination Remedy – Funding update:

FRA to note this and ensure that they provide the relevant data when required.

Age Discrimination Remedy – Member video:

FRA and administrators to publicise the QR code and signpost individuals to the FPS member website for information relating to remedy, in particular the member videos as part of your communications.

Concurrent Service – Interbrigade transfers:

FRA to make employees aware of the pension implications, should an overlap of service occur when leaving and joining another FRA, even if only by a day.

Public Service Pensions (Valuations and Employer Cost Cap) Directions 2023:

FRA and administrators should familiarise themselves with the Directions order to ensure that they are aware of the changes.

Public Service Pensions Remedy – Member calculator:

FRA to provide a Single Point of Contact (SPOC) to the Public Service Pensions Remedy mailbox.

FRA and administrators to familiarise themselves with the inputs that the member will need information for.

October 2023

LGA issued Bulletin 74

Bulletin 74 covered many topics most with actions arising, see below:-

Age discrimination remedy – Contingent Decisions guidance:

Scheme managers to read the guidance and mutually agree any setting of target dates with their administrator before sharing the claim process with members.

Firefighters' Pension Scheme Adjustment in Respect of 2021 and 2022 Revaluation:

This error will be required to be corrected by Scheme Managers retrospectively.

November 2023

LGA issued Bulletin 75

Bulletin 75 covered many topics with the following actions arising, see below:-

GAD calculator – FRAs:

FRAs should read the user guide and ensure that they have the most up to date version of the calculator when they update the spreadsheet at the beginning of the month to allow for the latest interest rates.

FRAs should share this information with anyone who is carrying out the Matthews second options exercise.

Matthews - Consequential loss claims:

FRAs should provide the information requested accordingly.

Matthews – Monitoring and Reporting:

FRAs to maintain robust record keeping ensuring that the data required by the Home Office and GAD is easily accessible.

Matthews - Deceased members:

FRAs to stockpile any cases which are currently not covered by the regulations until an amendment is in place.

HMRC 2022/2023 event reporting procedure for Annual Allowance and lifetime allowance (LTA):

Scheme Managers need to submit data by 31 January 2024.

December 2023

XPS attended LGA Fire Technical Working Group on 12th December 2023

LGA issued Bulletin 76

Bulletin 76 covered many topics with the following actions arising, see below:-

Matthews – Deceased members

LGA has provided template letters to cover these types of cases, which have been published on the Special members of the FPS 2006 section of the FPS regulations and guidance website.

FRAs to use the documents provided and can amend them where required.

Matthews – Supporting documents

The statements can be used to illustrate the output from the Matthews GAD calculator to provide the individual with information on their options.

FRAs are encouraged to use the Individual Statement of Details documents to send an individual with information on their options.

Age Discrimination remedy – Immediate Choice Remediable Service Statements (IC RSS)

FRAs are encouraged to discuss the timetabling of the IC RSS with their administrators and administrators are asked to commence testing the use of the IC RSS and provide feedback to the bluelightpensions@local.gov.uk inbox.

Contact Form

LGA ask for the completion of their online form, either completed on behalf of your fire authority and/or local authority or pass to anyone else who we may need their contact details.

This will be their new contact information for anything being sent out in 2024, even if they have your current details they ask you to still complete this by 20 January 2024

Security to protect against data breaches.

You may be aware of some high-profile data breaches that have been in the news recently, affecting well known professional services firms. We understand that the information leaked includes core personal member authentication information and XPS have taken steps to ensure members data we hold is not breached.

Member Authentication

XPS take the security of members information very seriously. Due to the risks of cybercrime, fraud associated with postal and email interception, or impersonation, it is important that the processes we use are robust. That is why we have standard processes to ensure a consistent approach is adopted for all our clients. Our current policy to authenticate a member is to ask them for 4 pieces of personal information.

- Full name
- Date of Birth (partial)
- Current Address
- NI number (partial)

However, we understand that all these data items have been compromised by at least one of the data breaches. This means that the information required to pass our security checks needs to be strengthened. To do this, we will ask the member for an additional piece of information that is unique to them and was not compromised in the breaches.

We have implemented changes that will ask members for additional personal information including their system ID, or where they do not have this, dates of joining or leaving the scheme or the related employment.

Data Transfers

There is also a low risk that there will be an increase in malicious software attacks from data transfers. Our IT Cyber Protection team have issued guidance to the whole of XPS (including the admin teams) on what to do if they receive any emails or data transfers. Data transferred through the XPS Secure site or file servers is automatically scanned for threats on receipt and the checks are repeated every night.

Ongoing

XPS will continue to monitor the position. If there are new developments, and additional security checks are needed, we will update our processes and keep you informed.

FRAs may want to highlight the risks of cybercrime and identity fraud in any upcoming member communications.

PASA Accreditation

We are delighted to advise you that XPS Administration has achieved accreditation against the PASA Pensions Administration Standards.

PASA Accreditation recognises the organisations in our industry that have evidenced compliance with the PASA Standards. This accreditation recognises the high-quality pensions administration service that XPS provides its

clients.

PASA Accreditation is an independent assessment of compliance with the PASA Standards. The assessment requires applicants to:

- > Submit evidence of operational compliance with the PASA Standards; and
- > Complete an on-site review by an independent assessor to validate the evidence provided for each site where services are provided from.

The Pension Regulator has stated that good administration can be demonstrated by independent accreditation. XPS Administration will be subject to an annual assertion to show we are continuing to maintain our high standards and will be independently audited every three years.



Additional Work / Previous Minutes

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

XPS are due to provide costings for their address tracing now that a supplier has been agreed.

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.

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.

02 Member Self Service

Analysis for member self service when compared to the previous quarter show a slight decrease across all membership cohorts.

Quarter 2 2023	REGISTERED	ACCOUNT DISABLED	ACTIVATION LINK SENT	NOT REGISTERED	TOTAL	% Up Take
Actives	255	1	7	333	595	43.0%
Deferred	98	0	4	184	286	34.3%
Pensioner	278	6	13	556	847	33.5%
Widow/Dep	21	0	0	134	155	13.5%
Total	652	7	24	1,207	1,883	35.0%

Quarter 3 2023	REGISTERED	ACCOUNT DISABLED	ACTIVATION LINK SENT	NOT REGISTERED	TOTAL	% Up Take
Actives	256	1	7	332	596	43.0%
Deferred	96	0	4	184	284	33.8%
Pensioner	279	6	13	555	848	32.9%
Widow/Dep	21	0	0	128	149	14.0%
Total	652	7	24	1,207	1,877	34.74%

	<i>Fire Averages for comparison with the service</i>					
	REGISTERED	ACCOUNT DISABLED	ACTIVATION LINK SENT	NOT REGISTERED	TOTAL	% Up Take
Actives	14.4%	0.2%	0.7%	14.4%	799	14.4%
Deferred	6.0%	0.1%	0.2%	13.8%	333	6.0%
Pensioner	13.6%	0.3%	0.6%	28.9%	752	13.6%
Widow/Dep	0.6%	0.0%	0.0%	6.7%	35	0.6%
Total	34.6%	0.5%	1.5%	63.8%	1,919	34.6%

Age Profiles of members who have registered for self-service			
Under 22	0.40%	Aged 46 - 50	24.51%
Aged 23 - 25	0.79%	Aged 51 - 55	27.27%
Aged 26 - 30	5.53%	Aged 56 - 60	3.56%
Aged 31 - 35	7.91%	Aged 61 - 65	1.98%
Aged 36 - 40	11.07%	Aged 65+	0.40%
Aged 41 - 45	16.60%		

03 Common Data

Surrey Fire					
Data Test	Common data score			Previous Quarter	
	Max Population	Total Fails	% OK	Total Fails	% OK
NINO	2321	2	99.91%	2	99.91%
Surname	2321	0	100.00%	0	100.00%
Forename / Inits	2321	0	100.00%	0	100.00%
Sex	2321	0	100.00%	0	100.00%
Title	2321	0	100.00%	0	100.00%
DoB Present	2321	0	100.00%	0	100.00%
Dob Consistent	2321	0	100.00%	0	100.00%
DJS	2321	0	100.00%	0	100.00%
Status	2321	0	100.00%	0	100.00%
Last Status Event	2321	5	99.78%	5	99.78%
Status Date	2321	17	99.27%	17	99.27%
No Address	2321	9	99.61%	9	99.61%
No Postcode	2321	18	99.22%	18	99.23%
Address (All)	2321	56	97.59%	50	97.85%
Postcode (All)	2321	64	97.24%	58	97.51%
Members with a Fail	2321	30	98.71%	30	98.71%
Members with Multiple Fails	2321	57	97.54%	51	97.81%
Total Fails	2321	87	96.25%	81	96.52%

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 102 and the youngest 10.

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

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

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

04 Membership

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

Quarter 3 2023-2024

Scheme	Actives	Deferred	Pensioner	Widow	Dependant
Old-FPS	0 -	68 -	797 ▲	146 ▲	7 -
New-NFPS	4 -	101 ▼	23 -	1 -	0 -
CARE - 2015	592 ▼	115 ▼	28 -	2 -	1 -
Total	596 ▼	284 ▼	848 ▲	149 ▲	8 -

Quarter 2 2023-2024

Scheme	Actives	Deferred	Pensioner	Widow	Dependant
Old-FPS	0 -	68 -	796 ▼	144 ▲	7 ▼
New-NFPS	4 ▲	102 ▲	23 ▲	1 -	0 -
CARE - 2015	593 ▲	116 ▲	28 ▲	2 -	1 -
Total	597 ▲	286 ▲	847 ▲	147 ▲	8 ▼

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 -

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

	Cases completed	Cases completed within the target	Cases completed outside the target	Cases: % within target
April	40	36	4	90%
May	46	39	7	85%
June	73	64	9	88%
Quarter 1	159	139	20	87%
July	88	86	2	98%
August	33	23	10	70%
September	36	27	9	75%
Quarter 2	157	136	21	87%
October	20	17	3	85%
November	6	5	1	83%
December	8	6	2	75%
Quarter 3	34	28	6	82%
January				
February				
March				
Quarter 4				
Totals	350	303	47	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

Q3 October 23					
Service	Days	Minimum Target	Cases	Within Target	Actual Performance %
Death in Service	5	100	0	0	0
Death of a pensioner	5	100	1	0	0
Deferred Benefits	10	90	0	0	0
Divorce Cases	30	100	0	0	0
Estimates	10	100	0	0	0
General	10	100	6	2	33
Processing new entrants	10	90	0	0	0
Refunds	10	100	1	1	100
Retirement Actual	10	100	3	3	100
Retirement Options	10	100	1	1	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	8	8	100

Q3 November 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	0	0	0
Divorce Cases	30	100	0	0	0
Estimates	10	100	0	0	0
General	10	100	2	2	100
Processing new entrants	10	90	0	0	0
Refunds	10	100	0	0	0
Retirement Actual	10	100	0	0	0
Retirement Options	10	100	0	0	0
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	3	2	67

Q3 December 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	0	0	0
Divorce Cases	30	100	0	0	0
Estimates	10	100	0	0	0
General	10	100	2	2	100
Processing new entrants	10	90	0	0	0
Refunds	10	100	0	0	0
Retirement Actual	10	100	0	0	0
Retirement Options	10	100	2	0	0
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	3	3	100

Task analysis - Fails

Month	KPI	Comments
October	Death	This was the closing of the admin side of a pensioner record. The payroll side was closed within one day and no impact on ongoing payments.
	Generals	One related to an enquiry from a former member's current FRA. One related to a query from someone asking about dependants eligibility criteria.
November	Address	Updating of active member's address on database.
December	Pension options	Post remedy options
	Pension options	Post remedy options

Management Comment

With reference to Q2 KPI compliance is equal to what was reported in Q1.

Patterns of work continue to be the same as reported in previous months and quarters and the additional workload and queries for the legislative changes due to remedy was starting to make more of an impact in Q2.

It is worth noting that the average time to complete these late cases across the quarter was within two weeks, so outside of the 10 working day SLA, with a few outlying cases. The longest delay was 52 days, but this was a case that had been dealt with on a separate occasion and was a follow up query. None of the failure cases represented any impact on any payments. We will continue to monitor performance and raise any areas of concern where necessary.

07 Complaints

Full Name	Description	Date received	Date completed	Comment
	None this period			

Paul Mudd
Governance Manager
01642 030682

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.

XPS Administration is the trading name of PS Administration Ltd.

Registration

Xafinity Consulting Ltd, Registered No. 2459442. Registered office: Phoenix House, 1 Station Hill, Reading RG1 1NB. Punter Southall Investment Consulting Ltd Registered No. 6242672, Punter Southall Ltd Registered No. 03842603, PS Administration Ltd Registered No. 9428346. All registered at: 11 Strand, London WC2N 5HR. All companies registered in England and Wales.

Authorisation

Punter Southall Investment Consulting Ltd (FCA Register number 528774) and Xafinity Consulting Ltd (FCA Register number 194270) are both authorised and regulated by the Financial Conduct Authority (FCA) for investment business.

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Surrey Local Firefighters' Pension Board

08 February 2024

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 75, 76, and 77 (Annex 1, 2, and 3) have been published since the last Board meeting.

- Bulletin 75 advised readers that the Matthews GAD calculator and user guide were released on 31 October 2023 and the documents can be accessed via the member area of the [FPS regulations and guidance](#) website.
The first live version of the calculator can be used to assist contribution calculations relating to the second options exercise. However, the calculator will need to be updated each month to allow for the latest applicable interest rates. The SFRS Pension team have registered with GAD to ensure they can access the most recent interest files available through the GAD Egress portal.
- The bulletin alerted readers to the fact that there are specific provisions in the [Firefighters' Pension Schemes \(England\) \(Amendment\) Order 2023](#) which provide remedy for deceased individuals. However, there are certain scenarios that have been omitted from the regulations. An individual who was not identified under the first options exercise (so never given the opportunity to join the modified scheme) and has since died is unable to make an election under the second options exercise. The Home Office is currently considering this issue and will provide an update in due course. The SFRS Pension team have identified a couple of individuals who meet this criteria and await clarity from the Home Office as to how these cases will be dealt with.
- Bulletin 75 informed readers that the Home Office and GAD have confirmed that there are some key areas that they will require FRAs to report on in relation to the Matthews second options exercise.
The first area is in respect of overall project implementation. It has been agreed that FRAs will be asked by the LGA to provide statistics on a quarterly basis:
 1. Total number of cases
 2. Total number of cases which have been sent the initial expression of interest letter.
 3. Total number of individuals who have replied and expressed an interest.
 4. Total number of cases which cannot be run through version one or two of the calculator and will need to be sent to GAD.
 5. Total number of statements issued.

6. Total number of individuals who have elected to join (broken down between member categories)
7. Total number of cases passed to the administrator for implementation

The second area is in respect of positive elections only. The Home Office and GAD would like FRAs to collate and share the GAD calculator inputs and outputs for all individuals who elect to join the second options exercise. The SFRS Pension team are ensuring that robust record keeping is maintained to ensure the data is facilitate this requirement.

- Bulletin 75 informed readers that [member FAQs](#) have been published on the FPS member website, in relation to the Second Options exercise. These can also be accessed on the [SFRS Pension Information SharePoint site](#).
- The bulletin informed readers that [member guidance](#) documents are now accessible on the [FPS member](#) website in relation to contingent decision options under the Age discrimination remedy. Further information is also available on the [SFRS Pension Information SharePoint site](#).
- Bulletin 75 reminded readers that the next Firefighters Pension Scheme actuarial valuation date is 31 March 2024. The SFRS Pension team have received the initial communications from Hymans and will be liaising with the payroll team and XPS to ensure timely completion of the data returns.
- The bulletin informed readers that the [retirement FPS 2015 factsheet](#) has been updated to reflect the revised early retirement recently published by GAD. The early retirement page of the [FPS member website](#) has also been updated.
- The bulletin referred to recently published results of the 2023 Governance and Administration survey from the Pension Regulator (tPR). The survey was conducted online between January and March 2023 to track governance and administration practices among public service pension schemes.

The report is being considered by the Local Pension Board (LPB) effectiveness committee to make recommendations to the Scheme Advisory Board (SAB) on any actions needed. The TPR six key processes factsheet will be updated in due course to reflect the latest performance and give further guidance to FRAs.

- The bulletin confirmed that the Pension Dashboard Programme recently published its research into the public value of pensions dashboards. Highlights of the research included:
 - the number of individuals saving into a pension has increased from 22.1 million to 28 million
 - the greatest increase in saving for pensions is among individuals aged between 16 and 34 with incomes between £10,000 and £30,000 per annum
 - pensions not in payment for adults aged 16 and over has increased from 33.7 million to 44.7 million
 - 18 million individuals have defined contribution pensions, while 14.4 million have defined benefit pensions
 - 79 per cent of individuals with a pension are actively contributing to at least one pension.

- Bulletin 76 included confirmation by the Government that GAD has completed and published the results of the 2020 Valuation of Firefighters' Pension Scheme (England). [The actuarial report](#) shows that the employer contribution rate will rise 8.5% to 38.7% of pensionable pay from 1 April 2024 to 31 March 2027.
- The bulletin informed readers that supporting documents, in relation to the Matthews Second Options exercise, have been published on the [Special Members of the FPS 2006](#) section of the FPS regulations and guidance website. These will be used by the SFRS Pension team to provide eligible individuals with information on their options relating to the purchase of backdated membership of the modified section of the 2006 Fire Pension Scheme.
- Bulletin 76 reminded readers of the duty to record and assess all breaches of law. In connection with the Matthews exercise, there was a disclosure deadline of 31 December to contact members in scope for the exercise. The SFRS Pension Team have received seven returned letters from the last known address of some individuals. There is also some concern that the Pension Team have only received a response from about a third of individuals contacted. To comply with the disclosure obligations, the Pension Team have employed the services of 'ITM' to conduct a full mortality and tracing exercise to contact those members where no response has been received.
- Bulletin 76 informed readers that The Pensions Dashboard Programme (PDP) are currently consulting with the industry regarding the final staging guidance that will be published by the Money and Pensions Service (MaPS) in the Spring of 2024. The staging guidance will confirm the staging date and, for Public Service Pension Schemes, this is likely to be in the summer of 2025.
- The Bulletin also reminded readers that the PDP publish regular [FAQ newsletters](#) about Pensions Dashboards as well as a [blog](#) covering most recent queries.
- Bulletin 76 advised readers that The Pensions Administrations Standards Association (PASA) has published [Pensions Dashboards Connection Ready Guidance](#) and a '[Call to Action](#)'. The Connection Ready Guidance explains what being 'connection ready' means and what a typical scheme plan could look like. The Call to Action lists the top five actions that schemes need to take now to prepare for dashboards.

The Bulletin informed readers that The Pensions Ombudsman (TPO) has published its [annual report and accounts](#) for 2022/23. The report includes statistics on TPO's caseload and performance for the year.

A recent Court of Appeal ruling judged that TPO is not a competent court for enforcing a dispute about a monetary obligation under section 91(6) of the Pensions Act 1995. The scheme also needs an order from a County Court to enforce a decision.

The Department for Work and Pensions supports legislative changes to formally empower TPO to bring these disputes to an end without needing a County Court Order. In the meantime, TPO has been working with stakeholders across the sector to review the management of such disputes to minimise the additional time and cost that has been added to the process. It has also published a recovery in overpayment cases [factsheet](#) to provide guidance to help schemes manage these disputes.

- Bulletin 76 informed readers that the Pensions Regulator (TPR) has revised its cyber security guidance. For the first time, the guidance asks pension schemes to report any significant cyber-related incidents to TPR on a voluntary basis as soon as is reasonably practicable. This will help TPR build a better picture of the cyber risk facing the industry and its members.
- Bulletin 76 advised readers that the Government is currently legislating through the Finance Bill 2023/24 to fully abolish the lifetime allowance from 6 April 2024 and put in place new rules to determine the tax treatment of pension lump sums. The newsletter gives information to support pension schemes to understand the changes. It covers changes to certain lump sums; the impact on lifetime allowance protections; changes to reporting and disclosure; and transitional arrangements.

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

Annexes

- Annex 1: FPS Bulletin 75
- Annex 2: FPS Bulletin 76
- Annex 3: FPS Bulletin 77

FPS Bulletin 75 – November 2023

Welcome to issue 75 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	12 December 2023
FPS Technical Working Group	12 December 2023
SAB	14 December 2023
FPS Coffee Morning	19 December 2023
FPS Communications Working Group	19 December 2023

Actions arising

[Matthews - GAD calculator](#) – FRAs:

1. should read the user guide.
2. should ensure that they have the most up to date version of the calculator when they update the spreadsheet at the beginning of the month to allow for the latest interest rates.
3. should share this information with anyone who is carrying out the Matthews second options exercise.

[Matthews - Consequential loss claims](#): FRAs should provide the information requested accordingly.

[Matthews – Monitoring and Reporting](#): FRAs to maintain robust record keeping ensuring that the data required by the Home Office and GAD is easily accessible.

[Matthews - Deceased members](#): FRAs to stockpile any cases which are currently not covered by the regulations until an amendment is in place.

[HMRC 2022/2023 event reporting procedure for Annual Allowance and lifetime allowance \(LTA\)](#): Scheme Managers should provide data by **31 January 2024**.

FPS

Matthews – GAD calculator

On 13 November 2023 we emailed you to announce that following the [Matthews GAD calculator launch and demo](#) coffee morning on 31 October 2023, the Matthews second options exercise – GAD calculator and user guide has been released.

These documents have been added to our existing [Special members of FPS 2006 - GAD Calculator](#) webpage within the member area of the FPS regulations and guidance website.

The calculator (first live version) can be used to assist contribution calculations relating to the second options exercise. Please note:

- This calculator can be used for calculations with effective dates in November 2023
- The calculator will need to be updated each month to allow for the latest applicable interest rates. GAD will make a monthly interest file available through their Egress portal which you will need to register for on an individual basis by emailing Firematthewscalculator@gad.gov.uk

[Click here to return to Contents](#)

- The types of cases covered by this calculator are set out in the user guide. A second version of the calculator, covering a wider group of categories, is being tested and is expected to be released by the end of the year.

The user guide provides detailed instructions on how to use the calculator. The guide details the cases which are covered by the calculator, data inputs required (both bulk and individual), and the output produced by the calculator. The guide also includes some worked examples and troubleshooting comments.

If you have any initial questions using the calculator, it is recommended that you contact the super users in the first instance. Their details are in the [‘Super Users’](#) tab on the webpage.

We are aware that FRAs will have to save a version of the calculator locally when they upload the interest file each month. We do however recommend that you check the website first to ensure that you are uploading interest to the most recent version of the calculator in case there have been any amendments.

Please ensure that you share this information with anyone who is carrying out the Matthews second options exercise on behalf of your Fire and Rescue Service.

Should you require access to the member area of the FPS regulations and guidance website, please email bluelightpensions@local.gov.uk.

ACTIONS: FRAs;

1. Should read the user guide.
2. Should ensure that they have the most up to date version of the calculator when they update the spreadsheet at the beginning of the month to allow for the latest interest rates.
3. Should share this information with anyone who is carrying out the Matthews second options exercise.

Matthews – Deceased members

Readers may be aware that there are specific provisions in the [Firefighters’ Pension Schemes \(England\) \(Amendment\) Order 2023](#) which provide remedy for deceased cases:

[Special death grant](#) – Individuals who have died in the period 7 April 2000 to 5 April 2006.

[Additional death grant](#) - Individuals **must** have joined the modified scheme as part of the first options exercise, purchased their past service to 1 July 2000 and would also have been entitled to purchase pre-July 2000 service as part of the 2023 Options exercise but for the fact that they have died prior to having the opportunity to make a positive election.

[Click here to return to Contents](#)

The LGA have alerted the Home Office to the following scenario:

An individual who was **not** identified under the first options exercise, so therefore were never given the opportunity to join the modified scheme but have since died and are therefore unable to make an election under the second options exercise - Presently the regulations do not provide any remedy for such cases.

The Home Office is currently considering this issue and will provide an update in due course.

It is recommended that until further clarity has been provided FRAs stockpile any cases which they identify meeting this specific set of criteria.

ACTION – FRAs to stockpile any cases which are currently not covered by the regulations until an amendment is in place.

Matthews – Monitoring and reporting

As we are now in the implementation phase of the Matthews remedy both the Home Office and GAD have confirmed that there are some key areas that they will require FRAs to report on.

The first area is in respect of overall project implementation. It has been agreed that FRAs will be asked by the LGA to provide the following data on a quarterly basis:

1. Total number of cases
 - a. Identified and individual located i.e. have an address on file
 - b. Identified but not located i.e. no address on record
2. Total number of cases which have been sent the initial expression of interest letter.
3. Total number of individuals who have replied and expressed an interest.
4. Total number of cases which cannot be run through version one or two of the calculator and will need to be sent to GAD.
5. Total number of statements issued.

6. Total number of individuals who have elected to join, to be broken down as follows:
 - a. Special members
 - i. Periodical
 - ii. Lump sum
 - b. Special deferred
 - i. Periodical
 - ii. Lump sum
 - c. Special pensioner

7. Total number of cases passed to the administrator for implementation.

The second area is in respect of positive elections **only**. The Home Office and GAD would like FRAs to collate and share the GAD calculator inputs and outputs for **all** individuals who elect to join the second options exercise.

- FRAs using the bulk processing interface can simply retain and concatenate input and output files for relevant cases.
- FRAs using the individual interface can use the “**Append to bulk interface**” button when processing elections to build up a file of results (see user guide page 11).

It is expected that this data will be requested on a quarterly basis, details on how this information will be shared will be provided in due course.

ACTION: FRAs to maintain robust record keeping ensuring that the data required by the Home Office and GAD is easily accessible.

Matthews – Supporting documents

In both [FPS Bulletin 73 – September 2023](#) and [FPS Bulletin 74 – October 2023](#) we made FRAs aware of the supporting documentation that has been published to support FRAs with the second options exercise.

In conjunction with the Matthews technical working group, we are pleased to publish [member FAQs](#) on the FPS member website.

FRAs are encouraged to signpost their members to these resources as part of the second options exercise.

With thanks to David Lofthouse at Humberside Fire and Rescue, we have published [a spreadsheet](#) on the [Firefighter pay scales section](#) of the FPS regulations and guidance website that sets out historical pay rate information for retained firefighters from 1977 to 2023.

FRAs are encouraged to use this alongside the pay scale documents, for any assumptions needed in the second options exercise.

[Click here to return to Contents](#)

Matthews – Consequential loss claims

On the 13 November we emailed FRAs alerting them to the possibility of receiving data requests from members in respect of the first options exercise.

Members are asking FRAs to provide details of the payments which they have made (and will continue to make, where applicable) in respect of both backdated contributions and interest. This information should be easily accessible for the FRA as it will have been captured in the [original calculator output document](#).

This information is required to support members with an ongoing consequential loss claim which the FBU have submitted on their behalf.

The request is time sensitive as all claims must be submitted to the Court by 31 January 2024, we therefore ask that you deal with these cases in a timely manner.

ACTION: FRAs are encouraged to respond to requests accordingly.

Age Discrimination Remedy – Member Contingent Decisions guidance

In [FPS Bulletin 74 - October 2023](#) we published our Scheme manager [Contingent Decisions guidance](#) and the member [claim form](#). To accompany this we have now published our [member guidance](#) which can be found under the '[Age Discrimination remedy – Contingent Decisions](#)' section on the [FPS member](#) website.

Firefighters Pension Scheme Valuation

The next valuation date is 31 March 2024 with data due to be submitted to GAD later in 2024. In the past the valuation data has been requested in the autumn, but the actual date is yet to be confirmed. The specification for the valuation is still under discussion and is expected to be finalised and communicated in early 2024.

Short Guide to the Firefighters Pension Scheme 2015

In [FPS Bulletin 73 – September 2023](#) we reminded FRAs that the scheme regulations do not support aggregation of concurrent service.

With thanks to Helen Scargill, and the communications working group, a section covering this has been included within the members [short guide to the FPS 2015](#) and an updated version has been added to the [Guides and sample documents](#) section on the FPS regulations and guidance website.

Retirement FPS 2015 factsheet

The retirement FPS 2015 factsheet has been updated to reflect the revised early retirement factors following the GAD revised factors, which were notified to stakeholders in [FPS Bulletin 71 – July 2023](#).

The [Retirement from FPS 2015 factsheet](#) has been uploaded to the [factsheets section](#) of the FPS regulations and guidance website.

[Click here to return to Contents](#)

Eligibility to join FPS 2015

At their meeting on 14 September 2023 the Scheme Advisory Board discussed the eligibility of Firefighter apprentices, and which Scheme they are eligible to join. It was agreed that the LGA would recirculate information on eligibility.

In [FPS Bulletin 10 – July 2018](#) we published a factsheet – [eligibility to join the Firefighters' Pension Scheme](#), which was updated in October 2019 and is available on the [factsheets section](#) of the FPS regulations and guidance website.

As contracts and roles are determined locally it is the responsibility of each Fire & Rescue Authority (FRA) as the employer to determine whether a role meets the definition of 'firefighter' under the interpretation of the regulations.

We would encourage you to consider the information set out within the factsheet when determining a firefighters' eligibility to join the FPS to ensure a consistent approach.

Firefighters Pensions - Payroll working group

At this month's FRA drop-in session, it was suggested that there may be a benefit in facilitating a payroll working group for those involved in the administration of Firefighter pensions.

If you would like to be involved in this, please send us an email bluelightpensions@local.gov.uk so that we can gauge interest and set up an invite list.

Technical query log

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

Queries have been answered this month in the following categories:

- Partial Retirement
- Post retirement marriage spouses benefits
- Aggregation

FPS England SAB updates

SAB LPB effectiveness committee vacancy

We have a vacancy on the Local Pension Board (LPB) effectiveness committee for a practitioner representative.

The LPB effectiveness committee considers how local pension boards and scheme managers can be supported centrally and has been particularly active in designing board surveys and developing draft guidance for joint LPB applications.

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

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

Cumbria FRS Job Vacancy

Cumbria Fire and Rescue are looking for individuals with extensive generalist pay, reward and pensions knowledge. If this is something that you possess, then they would love for you [to apply](#) for this new role.

New pensions minister

On 16 November 2023, Paul Maynard MP for Blackpool North and Cleveleys was confirmed as the new pensions minister. Paul replaces Laura Trott who is promoted to Chief Secretary of the Treasury.

The Pension Regulator – 2022/23 Governance and Administration survey results

On 27 November 2023 the Pension Regulator (tPR) published the results of its [2023 Governance and Administration survey](#).

The survey was conducted online between January and March 2023 and aims to track governance and administration practices among public service pension schemes.

TPR measures annual progress against the following six key processes:

- have a documented policy to manage board members' conflicts of interest
- have access to the knowledge, understanding and skills needed to properly run the scheme
- have documented procedures for assessing and managing risk
- have processes to monitor records for accuracy and completeness
- have a process for resolving contribution payment issues
- have procedures to identify, assess and report breaches of the law.

67 per cent of Firefighters' schemes who responded to the survey had all six processes in place. This is a decrease from 74 per cent in 2021. The report is being considered by the Local Pension Board (LPB) effectiveness committee ("the Committee") to make recommendations to the Scheme Advisory Board (SAB) on any actions needed.

The [TPR six key processes](#) factsheet will be updated in due course to reflect the latest performance and give further guidance to FRAs in order to achieve a higher rate of understanding and compliance ahead of future surveys.

In the short-term, the Committee recommends that LPBs can use the survey results to carry out an annual evaluation.

[Pension Dashboard Programme \(PDP\) latest news](#)

On 1 November 2023, PDP published its [November newsletter](#).

The newsletter contains the 8th progress update report from PDP – looking at PDPs preparations toward industry connection to the dashboards ecosystem. There are also articles on:

- common questions on dashboards
- understanding the architecture and find and view webinar
- the Pensions Regulator's blog on preparing for dashboards.

Pension Dashboard Programme (PDP) publishes research into the public value of dashboards

On 1 November 2023, PDP published its [research into the public value of pensions dashboards](#). Highlights of the research includes:

- the number of individuals saving into a pension has increased from 22.1 million to 28 million
- the greatest increase in saving for pensions is among individuals aged between 16 and 34 with incomes between £10,000 and £30,000 per annum
- pensions not in payment for adults aged 16 and over has increased from 33.7 million to 44.7 million
- 18 million individuals have defined contribution pensions, while 14.4 million have defined benefit pensions
- 79 per cent of individuals with a pension are actively contributing to at least one pension.

HMRC

2022/23 Event Reporting - Annual Allowance Statements & Lifetime allowance

On 8 November 2023, we emailed all Scheme Managers and administrators alerting them to the HMRC 2022/2023 event reporting procedure for pension saving statements (PSS) and lifetime allowance (LTA) protections.

We confirmed that HMRC will accept scheme data for the 2022/23 PSS on an excel spreadsheet encrypted via Winzip rather than through the scheme's event report. All other 2022/23 scheme events, apart from the lifetime allowance protection regimes, must be submitted via Pensions Schemes Online.

The data must be submitted by **31 January 2024**.

The event report has not been updated to include the lifetime allowance protection regimes – see [pension schemes newsletter 85](#) for more information.

Any administrator who needs to submit these details to HMRC, can submit them on a password protected spreadsheet and send the password in a separate email. Put 'Lifetime allowance – Event Reporting' in the subject line of the email and send to pensions.businessdelivery@hmrc.gov.uk.

ACTION: Scheme Managers need to submit data by 31 January 2024

Events

FPS coffee mornings

Our MS Teams coffee mornings are continuing in December. 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.

In December, due to timing of the completion of projects, and other meeting commitments, we plan to hold two coffee mornings. The first will be on 12 December, when we aim to launch the Immediate Choice (IC) Remediable Service Statement (RSS). The second will be on 19 December 2023.

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

[7 November 2023 - Remedy Interest](#)

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

Useful links

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

Contact details

Claire Johnson (Senior Firefighters' Pensions Adviser)

Telephone: 07920 861 552

Email: claire.johnson@local.gov.uk

Tara Atkins (Firefighters' Pensions Adviser)

Telephone: 07825 731 924

Email: Tara.atkins@local.gov.uk

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

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FPS Bulletin 76 – December 2023

Welcome to issue 76 of the Firefighters' Pensions Schemes bulletin.

I think it would be fair to say that this has been a very busy year in the Firefighters' pensions world.

The vital input you have put into the working groups, the volunteers for the testing of calculators, the discussion input and suggestions from regional groups and drop-in sessions. We just could not have done it without the help and support from all our colleagues during the year.

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

Merry Christmas and happy New Year
From the Firefighters Pension Team



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.

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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	10 January 2024 and 30 th January 2024
FPS Technical Working Group	12 March 2024
SAB	21 March 2024
FPS Communications Working Group	2 April 2024

Actions arising

[Matthews – Deceased members](#) - FRAs to use the documents provided and can amend them where required.

[Matthews – Supporting documents](#) - FRAs are encouraged to use the Individual Statement of Details documents to send an individual with information on their options.

[Age Discrimination remedy – Immediate Choice Remediable Service Statements \(IC RSS\)](#) –

- 1) FRAs are encouraged to discuss the timetabling of the IC RSS with their administrators.
- 2) Administrators are asked to commence testing the use of the IC RSS and provide feedback to the bluelightpensions@local.gov.uk inbox.

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[Firefighters' pension scheme contacts](#) - All readers to complete the contact form response by **20 January 2024**

FPS

2020 Valuation – Firefighters' Pension Scheme (England)

On 21 December 2023 the [Government announced](#) that GAD had completed its valuation of Firefighters' Pension Scheme (England) and published the results of the 2020 Valuation.

The [actuarial report](#) shows that the employer contribution rate will rise 8.5% to 38.7% of pensionable pay from 1 April 2024 to 31 March 2027.

Further information regarding funding will be communicated in the New Year.

Matthews – Deceased members

In [FPS Bulletin 75 – November 2023](#), we made readers aware of the specific provisions which provide remedy for deceased beneficiaries.

We have provided template letters to cover these types of cases, which have been published on the [Special members of the FPS 2006](#) section of the FPS regulations and guidance website.

The letters cover the following scenarios:

Scenario one – Additional death grant

A beneficiary who was involved in the first options exercise, and due to the amended regulations is now entitled to the additional death grant, as their spouse/civil partner was in retained employment in the period before and including 7 April 2000 to 30 June 2000.

Scenario two – Death grant

A beneficiary whose spouse/civil partner died before 6 April 2006 and was not in scope for the first options exercise for a death grant payment as the retained service fell into the period of 7 April 2000 to 30 June 2000 (inclusive).

To accompany each scenario an application form has been created, which should be included with the initial letter.

ACTION: FRAs to use the documents provided and can amend them where required.

Matthews – Supporting documents

In [FPS Bulletin 73 – September 2023](#), [FPS Bulletin 74 – October 2023](#) and [FPS Bulletin 75 – November 2023](#) we made readers aware of the supporting documentation that has been published to assist FRAs with the implementation second options exercise.

With thanks to Jill Swift at Cheshire Fire and Rescue Service, James Durrant at Essex Fire and Rescue Service and the Communications Working group we have published an Individual Statement of Details document, for each category of special membership.

The statements can be used to illustrate the output from the Matthews GAD calculator to provide the individual with information on their options.

The document can be found on the [Special Members of the FPS 2006](#) section of the [FPS regulations and guidance](#) website.

ACTION: FRAs are encouraged to use the Individual Statement of Details documents to send an individual with information on their options.

Matthews – Breaches of law

As the disclosure deadline for Matthews approaches, we have been informed that, in a small number of cases, FRAs are receiving their initial communications returned from the last known address of the eligible individual.

Although the FRA will endeavor to trace the individual this may not be possible by the disclosure deadline resulting in a breach of law.

We would like to take this opportunity to remind readers that **ALL** breaches of law must be recorded and assessed for materiality. If the breach is considered to be material, then it should be reported to TPR.

In all cases it is recommended to report a breach to your Local Pension Board.

Further guidance on breaches of law can be found in [FPS Bulletin 23 – August 2019](#).

Age discrimination remedy – Immediate Choice Remediable Service Statement (IC RSS)

On 12 December 2023 we held the [Immediate Choice Remediable Service \(IC RSS\) Statement and timetabling](#) coffee morning where we provided a preview of the IC RSS and supporting documentation.

We have uploaded these to a new section in the member area of the FPS regulations and guidance website titled '[Remediable Service Statements](#)'.

For ill health cases it has been agreed by the Technical Working group that a covering letter should accompany the IC RSS. Template covering letters have been provided for all ill health scenarios.

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The documents include:

- IC RSS conditional text document
- IC RSS graphic templates
- Supporting forms
- Ill Health RSS covering letter

We are currently finalising the beneficiary IC RSS and will communicate further in the new year.

ACTIONS:

- 1) FRAs are encouraged to discuss the timetabling of the RSS with their administrators.
- 2) Administrators are asked to commence testing the use of the IC RSS and provide any feedback to bluelighpensions@local.gov.uk

Firefighters' Pension Scheme Contacts



Are you or one of your colleagues involved in the administration of Firefighters' pensions? This could be anyone from, but not limited to the Chief Fire Officer (CFO), Scheme Manager (if different to the CFO), Human Resources, Finance, internal pensions team and payroll.

Do you receive the information from the LGA about the correct things?

We want to update our contacts to ensure that our bulletins, guidance, training, coffee morning invites and FRA drop-in sessions are getting to the correct people.

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Please can we ask you to complete the online form linked below and either complete on behalf of your fire authority and/or local authority or pass to anyone else who we may need their contact details.

This will be our new contact information for anything being sent out in 2024, therefore even if we have your current details, we will need you to complete this by **20 January 2024**.

If we do not have your details, we cannot contact you and you may miss something important particularly now with all the relevant information.

[Contact Form response](#)

ACTION: All readers to complete the contact form response by **20 January 2024**

Technical query log

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

Queries have been answered this month in the following categories:

- Death benefits – post retirement marriage in the FPS 2025



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FPS England SAB updates

Festive Greetings from the SAB Chair



Dear Friends & colleagues,

I am opening this message with the customary salutation which feels more relevant than ever. 2023 has been a year in which the need for friendship in the world has seldom seemed more elusive but more important.

I'd like to welcome some new friends into the fire pensions area. Councillor Byron replaced Councillor Redman for the SAB. We were also pleased to welcome Claire Johnson back from maternity leave and to the position of Senior Pensions Adviser and to confirm the permanent appointment of Tara Atkins. We thank Claire Hey and Elena Johnson for all the work that they did for the LGA Fire pensions team before their separate departures from the team this year.

This was a landmark year given the finalisation of so many areas of the Fire Pension regulations although the work to implement the many changes continues. More generally we are seeing changes in the wider pensions area with a significant element of the recent Autumn Statement devoted to proposals around using funds to benefit the wider economy, addressing governance models for pension schemes and improving member outcomes. For those with individual pension pots, artificial intelligence is being suggested as a way to assist member decisions making.

So, I thought I would see what Artificial Intelligence would make of the message I want to send to the Fire Pensions Industry at this time. In particular, I asked it to use a Christmas carol theme and noted that I really wanted to thank those who had worked so hard and to acknowledge the significant challenges still remaining. Here's what a number of iterations with the software produced:

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(To the tune of "Silent Night")

Verse 1: Silent night, though uncertainties may be vast, In the fire pensions realm, teams working steadfast. Through legislation's changes, tools both old and new, Countless complexities, faced by each of you.

Chorus: Thank you, dear teams, in your various roles, For weathering the storms, achieving your goals. In the fire's glow, you labor with might, Not everything settled, but you work through the night.

Verse 2: Silent night, your dedication shines bright, In the face of challenges, you've embraced the fight. New processes and tools, like stars in the sky, Guiding you forward, as the years roll by.

Chorus: Thank you, thank you, to teams far and wide, In the fire pensions industry, where you reside. Not every detail is clear or set, But your hard work and efforts, we'll never forget.

Bridge: Silent night, where teams collaborate, Facing uncertainties, your resolve is great. Through twists and turns, and complexities untold, Your commitment to excellence, a story to be told.

Verse 3: Silent night, as we approach year's end, A heartfelt thank you to each colleague and friend. For the fire pensions industry, you are the light, Working tirelessly, even in the night.

Chorus: Thank you, dear teams, for your unwavering grace, In this ever-changing and complex space. Not everything settled, but together we stand, In the fire's glow, a united band.

Outro: Silent night, may the season bring peace, To the fire pensions teams, your efforts won't cease. As uncertainties linger, and new challenges arise, Your dedication and hard work are our cherished prize.

Not necessarily a Christmas Carol to rival Charles Dickens or John Rutter but it does suggest that the role of AI in our world in years to come may be interesting.

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

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SAB meeting 14 December 2023

The Scheme Advisory Board (SAB) last met on 14 December 20223 and the meeting covered the following areas:

- First Actuarial – Review of GAD Tax and Contribution calculator
- Government closed consultation – Amendment to the Firefighters Pension Scheme (England) Regulations 2014

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](#)

SAB response to Consultation on the amendments to the Firefighters' Pension Scheme (England) Regulations 2014

On the 27 November 2023, the Home Office published a closed consultation to address amendments that were needed to correct the error to the Average Weekly Earnings for 2021 and 2022, as well as the amendments providing clarification on the introduction of the Carer's Leave Act 2023.

The Scheme Advisory Board were invited to provide a response to the consultation and this is available on the [Consultations](#) section of the [Firefighters' Pensions SAB \(England\)](#) website.

Other News and Updates

The Pensions Dashboard Programme – proposed staging date and timeline

The Pensions Dashboard Programme (PDP) are currently consulting with the industry regarding the final staging guidance that will be published by the Money and Pensions Service (MaPS) in the Spring of 2024. The staging guidance will confirm the staging date.

We expect that the staging date for Public Service Pension Schemes is likely to be summer of 2025.

[Regulation 15\(2\) of the Pensions Dashboards Regulations 2022](#) confirms Scheme Managers have a legal duty to have regard to this guidance.

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The Pensions Dashboard Programme – Frequently Asked Questions Newsletters

PDP publish regular [FAQ newsletters](#) about the Pensions Dashboards and the Programme which you can find on their [website](#).

In their [latest newsletter](#) they cover the legislative timescales to return pensions information to members via dashboards.

The Pensions Dashboard Programme - Blog on recent queries

On 30 November 2023, the Pensions Dashboards Programme (PDP) published a [blog covering the following recent queries they have received](#):

- When do PDP expect to publish dashboard standards?
- What are the different types of testing?
- When will the dashboards available point be?

PASA dashboard guidance

The Pensions Administrations Standards Association (PASA) has published [Pensions Dashboards Connection Ready Guidance](#) and a [‘Call to Action’](#).

The Connection Ready Guidance explains what being ‘connection ready’ means and what a typical scheme plan could look like. It covers five main areas: governance, matching, value data, technology and administration. For each area, it describes the key activities, how to do them, why they matter and how to show that they have been done.

The Call to Action lists the top five actions that schemes need to take now to prepare for dashboards.

PASA will release further supporting materials in the next few months, such as practical tips for certain connection ready activities, checklist of key actions and outlines of connection ready decisions.

The Pensions Ombudsman - Annual report 2022/23

The Pensions Ombudsman (TPO) has published [its annual report and accounts for 2022/23](#).

The report includes statistics on TPO’s caseload and performance for the year.

The Pensions Ombudsman – Response to Court of Appeal ruling

TPO has [expressed its disappointment about the recent Court of Appeal ruling](#) that it is not a competent court for enforcing a dispute about a monetary obligation under section 91(6) of the Pensions Act 1995.

The ruling means that a TPO decision to allow recoupment / recovery from a pension is not enough to enforce it. The scheme also needs an order from a County Court.

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The Department for Work and Pensions is supporting legislative changes to formally empower TPO to bring these disputes to an end without needing a County Court Order.

In the meantime, TPO has been working with stakeholders across the sector to review the management of such disputes to minimise the additional time and cost that has been added to the process. It has also published [a recovery in overpayment cases factsheet](#) to provide guidance to help schemes manage these disputes.

The Pensions Regulator - Cyber security guidance

The Pensions Regulator (TPR) has revised its [cyber security guidance](#).

The guidance helps trustees and pension scheme managers meet their duties to assess the risk, ensure controls are in place, and respond to incidents.

For the first time, the guidance asks pension schemes to report any significant cyber-related incidents to TPR on a voluntary basis as soon as is reasonably practicable. This will help TPR build a better picture of the cyber risk facing the industry and its members.

HMRC

Lifetime allowance guidance newsletter – December 2023

HMRC has published the [Lifetime allowance guidance newsletter – December 2023](#).

The Government is currently legislating through the [Finance Bill 2023/24](#) to fully abolish the lifetime allowance from 6 April 2024 and put in place new rules to determine the tax treatment of pension lump sums.

The newsletter gives information to support pension schemes to understand the changes. It covers:

- the changes to certain lump sums
- the impact on lifetime allowance protections
- changes to reporting and disclosure
- the transitional arrangements.

HMRC wants to help pension schemes get ready for the changes and is keen to hear from them. The newsletter invites schemes to share their views on what topics they would like to see covered in future communications and whether they would find it useful to have more working groups to discuss the detail.

Pensions Schemes Newsletter 154 – November 2023

On 30 November 2023, HMRC published their November 2023 edition of the [Pension Schemes Newsletter 154](#). Within this edition they cover:

- The Government's Plan to fully abolish the lifetime allowance (LTA) from 6 April 2024. HMRC will provide further details through a future LTA newsletter.
- A request for schemes to remind members who have exceeded the annual allowance for tax year 2022/23 and do not have sufficient unused annual allowance to declare this on their Self-Assessment tax return, even if the scheme is going to pay the tax charge.
- How to pay pension scheme charges when the scheme does not have a specific charge reference to make payment against.

Events

FPS coffee mornings

Our MS Teams coffee mornings will be continuing through 2024. The informal sessions lasting up to an hour allow practitioners to catch up with colleagues and hear a brief update on FPS issues from the LGA Bluelight team.

The first session of the new year will be taking place on 10 January 2024 at 10am, where the Government Actuary's Department (GAD) will be joining us to discuss the 2020 Valuation results.

The second session will be held on 30 January 2024 at 10am. The content of this session is still being finalised, but will be confirmed in the new year.

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

12 December 2023 – [Immediate Choice Remediable Service Statement \(RSS\) and timetabling](#)

19 December 2023 – [End of year review and a forward look to 2024](#)

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.

Local Pension Board Training

We are looking to change the way that we deliver Local Pension Board (LPB) training in 2024 to allow us to provide more dynamic and engaging sessions.

The training will take place every quarter and will be open to new and existing LPB members, and any other individuals who are involved in the governance of their LPB.

We are in the process of finalising the agenda and are speaking with stakeholders to agree dates.

So, keep an eye out for the dates to get booking on.



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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Legislation

Statutory Instruments

[The Firefighters' Pension Scheme \(Scotland\) Amendment Regulations 2023 \[SSI 369/2023\]](#)

Contact details

Raising a query

If you have a technical query, please complete the 'query form', that is available on the [member area](#) of the FPS regulations and guidance website and email bluelightpensions@local.gov.uk and one of the team's Firefighters' pension advisers will get back to you. To avoid delays in receiving a response, please do not email advisers directly.

Claire Johnson (Senior Firefighters' Pensions Adviser)

Telephone: 07920 861 552

Email: claire.johnson@local.gov.uk

Tara Atkins (Firefighters' Pensions Adviser)

Telephone: 07825 731 924

Email: Tara.atkins@local.gov.uk

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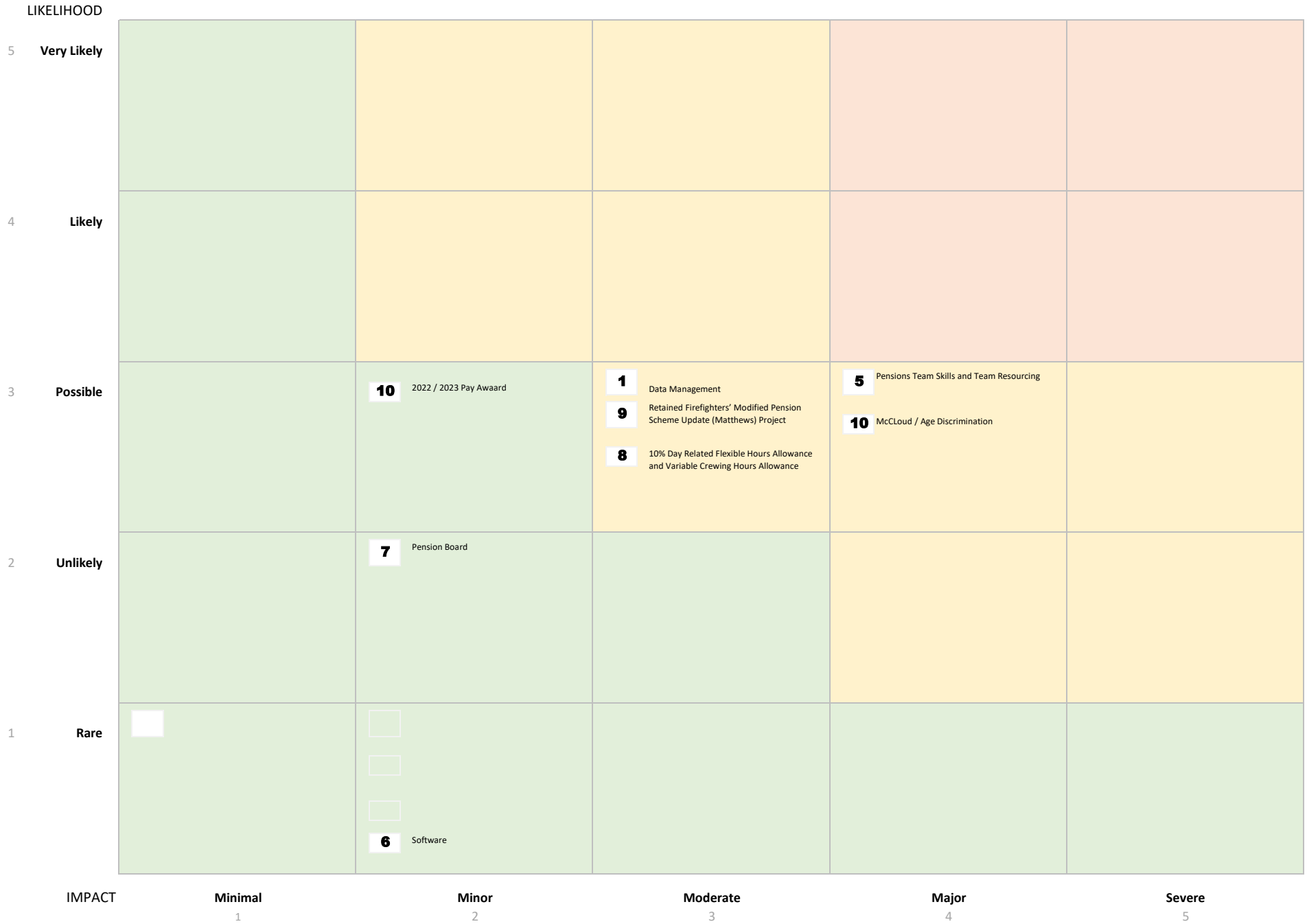
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While every attempt is made to ensure the accuracy of the bulletin, it would be helpful if readers could bring any perceived errors or omissions to the attention of the Bluelight team by emailing bluelightpensions@local.gov.uk.

Risk ID	Risk Title	Risk Owner	Risk with current mitigation controls in place		Overall Score
			Likelihood (1-5)	Impact (1-5)	
1	Data Management	Scheme Manager	2	3	6
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
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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	Jun-24
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	Jun-24

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
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.	External training provider being explored to provide Fire pension specific training. This is being offered by ISIO who have run similar courses for the individuals involved with the Police Pension Schemes	Senior Pensions Advisor / Pensions Project Officer & XPS	Jun-24
			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) Unit 4 access has been granted to all Pension Team members. 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 has been granted to Pensions Team staff	Scheme Manager / Senior Pensions Advisor / Pensions Project Officer
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) Unit 4 is in place and the Pension Team are testing the data quality of the migration of SAP to Info Archive. Initial data testing is positive. The 'Live' date has not yet been announced due to numerous errors with the Unit 4 system. When Info Archive goes live, further testing will be required in the 'live' environment.		Senior Pensions Advisor	Jun-24

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.	Future training run by the LGA, for 2024, will be in a new format. There are likely to be 4 identical sessions available to book during the year and these will be run online via teams. Further details are awaited regarding dates etc.	Local Firefighter Pension Board	Jun-24

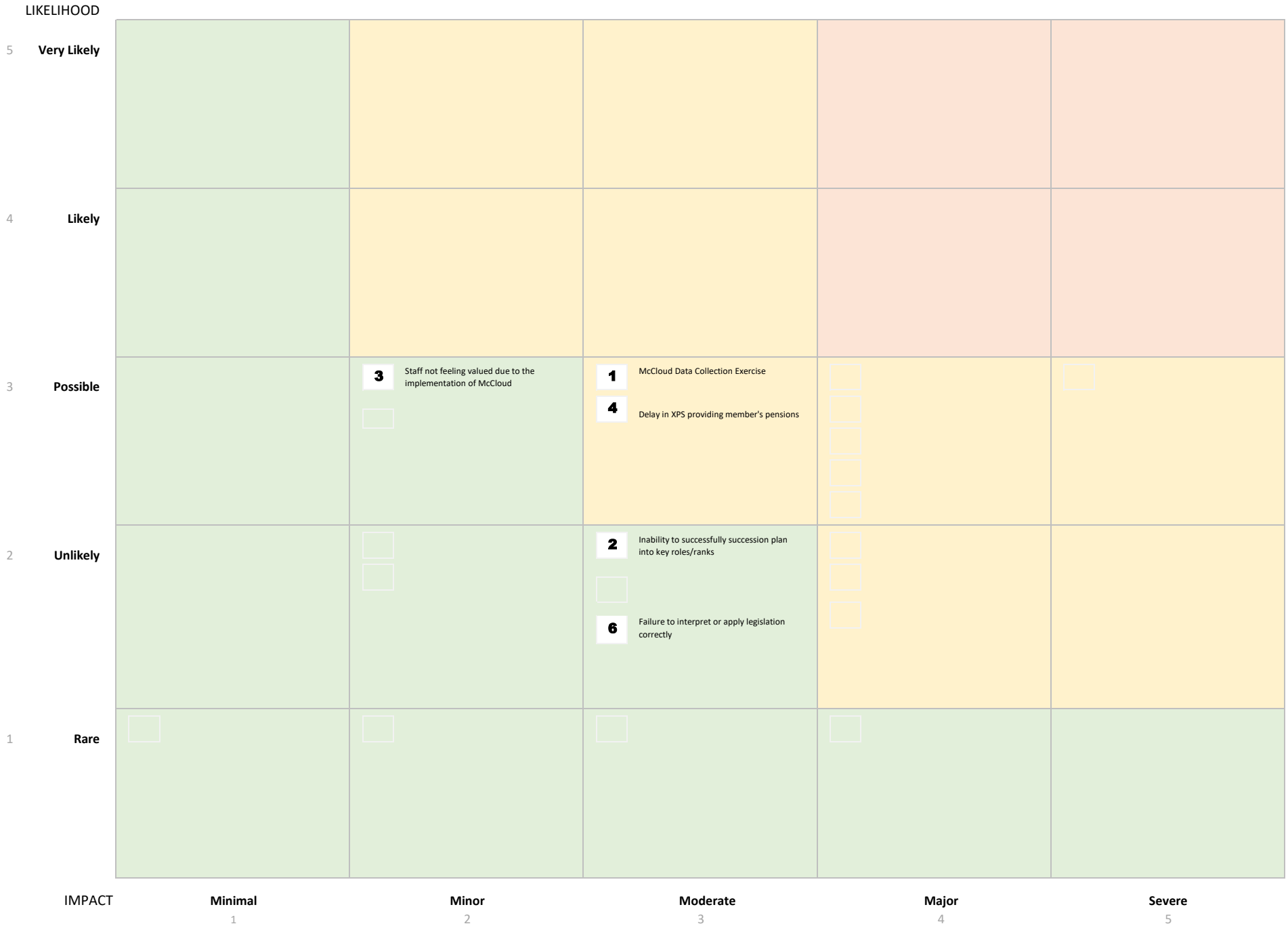
Risk ID	Risk Title	Risk Area	Risk sub-ID	Causes	Effect	Risk Owner	Likelihood (1-5)	Impact (1-5)	Overall Score	Key Existing Management Controls	Planned Enhancements to Controls (Actions)	Action by Whom	Target Review Date
8	10% Day Related Flexible Hours Allowance and Variable Crewing Hours Allowance		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) Priority groups 1 to 3 have been completed.		Scheme Manager	Jun-24
			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 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. 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	Jun-24
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) The modified scheme opened via the second options exercise in October 2023. The affected members have been notified and expression of interest forms have been sent out.	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	Jun-24
			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. 5) The LGA have provided draft communications to send out to members and continue to advise on how to progress the exercise.		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Jun-24

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
			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 reopened 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). The first phase of the GAD calculator has been released which can be used for limited straightforward cases. The 2nd Phase is due to be released early 2024.		Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Jun-24
			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 have designed 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. The LGA have produced Statement templates to send options to members.	Scheme Manager / Senior Pensions Advisor / Pensions Project Officer	Jun-24
			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 the GD calculator has been released to FRAs (due in two phases - November and January 2024)		Scheme Manager / Senior Pensions Advisor	Jun-24
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. 4) The Pension Team are preparing GAD calculations for affected members as required by XPS	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	Jun-24
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	Jun-24

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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
6	Failure to interpret or apply legislation correctly	Scheme Manag	2	3	6

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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	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. The pension team have been testing the 'SAP info archive data' to ensure data quality and accuracy is maintained once SAP is closed down	Senior Pensions Advisor	Jun-24
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.	pre-retirement courses have been arranged with an external provider (Affinity Connect) Regular communications continue to educate members regarding retirement/ returning to work and abatement	Pensions Project Officer	Jun-24
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.	The pensions SharePoint page is updated regularly with developments The Pensions Team also writes regular pieces for SFRS News to keep members informed	Pensions Project Officer	Jun-24
4	Delay in XPS providing member's pensions	Pension payments		Increase in members wishing to retire once the new legislation is in effect.	Members are unhappy with the Service received and may raise an IDRP.	Scheme Manager	3	3	9	XPS have been informed of members who are due to leave in October which the Service are aware of. XPS are aware that some members may delay their retirement date due to the legislation implementation date. XPS have recently completed an aggressive recruitment drive in order to prepare for the legislation and meet their KPIs. XPS are working with Heywood to aim for the software to be ready for October 2023. Pensions Team provide regular communications to active members. Continue planned meetings with XPS on the McCloud project.	KPI's have been updated by XPS to reflect the new legislation and are constantly under review.	Senior Pensions Advisor	Jun-24

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
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	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. LGA have provided draft communications for sending to members	The Home Office have provided a GAD calculator for all Fire Services to use to ensure a consistent approach is taken when members' pension benefits are being calculated. Calculations and RSSs will be prepared by XPS.	Senior Pensions Advisor	Jun-24

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
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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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	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 is included on the Pension SharePoint site and is regularly updated with developments. Contact with the Fire Brigades Union (FBU) Old Comrades Association (OCA) and National Association of Retirement Firefighters (NARF) has failed to trace member's Next of Kin for members who have passed away. The Pension Team are employing the services of ITM, a tracing and mortality specialist, to trace members who have not responded to our communications	Pensions Project Officer	Jun-24
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 IDR. 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. 37 members have been identified who are impacted by both Matthews and McCloud 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 Project Officer	Jun-24
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 to follow guidance regarding how and what assumptions will be used for missing historical data. Further guidance is available on the LGA website.	Subject Matter Experts & Senior Pensions Advisor.	Jun-24
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 IDR. 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 statement of service.	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. The legislation has been laid and came into force on 1 October 2023. LGA has provided draft communications for sending to members. GAD have produced a calculator for FRAs to use and this will be available in two phases. Phase 1 has been released and phase 2 is due to be released early 2024	Senior Pensions Advisor.	Jun-24
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.	Jun-24
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.	Jun-24

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