

Fire & Rescue Service Headquarters Summergroves Way Kingston upon Hull HU4 7BB
 Telephone 01482 565333

To: Members of the Pension Board	Enquiries to: Samm Campbell Email: committeemanager@humbersidefire.gov.uk Tel. Direct: (01482) 393205 Date: 23 January 2023
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Dear Member

Kindly find attached the Agenda and papers for the ANNUAL MEETING of the **PENSION BOARD** of the Humberside Fire Authority to be held at **HUMBERSIDE FIRE & RESCUE SERVICE HEADQUARTERS, SUMMERGROVES WAY, KINGSTON UPON HULL, HU4 7BB on MONDAY, 30 JANUARY 2023 at 10.30AM.**

The business to be transacted is set out below.

Yours sincerely



for Lisa Nicholson
Monitoring Officer & Secretary to the Fire Authority

Enc.

A G E N D A

Business	Page Number	Lead	Primary Action Requested
1. Apologies for absence	-	Monitoring Officer/ Secretary	To record
2. Declarations of Interest (members and Officers)	-	Monitoring Officer/ Secretary	To declare and withdraw if pecuniary
3. Minutes of the meeting of 11 July 2022	(pages 1 - 2)	Chairperson	To approve
4. Matters arising from the Minutes, other than on the Agenda	-	Chairperson	To raise
5. Update Report: Reporting Breaches	Verbal	Procurement Manager	To receive
6. Workstreams Update	(pages 3 - 147)	Head of Finance/Deputy s151 Officer	To receive

Business	Page Number	Lead	Primary Action Requested
7. Sargeant Update	Verbal	Head of Finance/Deputy s151 Officer	To receive
8. Any other business	-	All Members	To raise

Under the Openness of Local Government Bodies Regulations 2014 members of the public may film, record, take photographs or use social networking during Authority and committee meetings that are open to the public. *The Monitoring Officer/Secretary kindly requests advance warning from anyone wishing to film, record or take photographs during open meetings so that suitable provision can be made.*

* - Further details are accessible via an electronic link alongside the agenda papers on the Fire Authority's website (www.humbersidefire.gov.uk/fire-authority/fire-authority-documents)

HUMBERSIDE FIRE AUTHORITY

PENSION BOARD

11 JULY 2022

PRESENT:

Employer representatives: Councillor Shepherd (Chairperson) and Steve Topham (Director of Emergency Response)

Scheme Member representatives: Brian Johnson

Councillor Briggs attended an observer.

Kevin Wilson - Executive Director of Finance/Section 151 Officer and Scheme Manager, Martyn Ransom - Joint Deputy Chief Finance Officer, Sarah Keyes - Finance Officer, Lisa Nicholson - Monitoring Officer/Secretary and Samm Campbell - Committee Manager.

The meeting was held at the Humberside Fire and Rescue Service Headquarters, Kingston upon Hull. Meeting commenced at 10.30 a.m.

The Monitoring Officer/Secretary took the chair for Minute 10/22.

PROCEDURAL

10/22 ELECTION OF THE CHAIRPERSON OF THE BOARD 2022/23 - *Resolved* - That Councillor Shepherd be appointed Chairperson of the Pension Board until its Annual General Meeting in 2023.

Councillor Shepherd took the chair.

11/22 APOLOGIES FOR ABSENCE - There were no apologies for absence.

12/22 DECLARATIONS OF INTEREST - There were no declarations of interest.

13/22 MINUTES - *Resolved* - That the minutes of the meeting of the Board held on 31 January 2022 be confirmed as a correct record.

14/22 MATTERS ARISING FROM THE MINUTES - There were no matters arising from the minutes.

15/22 CALENDAR OF BOARD MEETINGS 2022/23 - *Resolved* - That the calendar of Board meetings be received.

16/22 PENSION FUND ACCOUNT - The Joint Deputy Chief Finance Officer submitted the Pension Fund Account which had been included in the draft Annual Accounts presented to the Fire Authority at its meeting of 24 June 2022.

Resolved - That the Pension Fund Account be received.

17/22 REPORTING BREACHES - The Finance Officer informed the Board that there had been no breaches since the meeting held on 31 January 2022.

Resolved - That the update be received.

18/22 PENSION BOARD WORKSTREAMS UPDATE - The Head of Finance submitted a report setting out an update on the Board's workstreams for 2022/23.

The Board was reminded that Members could submit requests for training. No complaints had yet been received during 2022/23. The pension fund administration key performance indicators showed good outcomes.

Resolved - That the report be received.

19/22 ANY OTHER BUSINESS – There were no items.

WORKSTREAMS UPDATE

SUMMARY

1. This report sets out an update on the workstreams that were originally agreed at the Pension Board in January 2016.
2. The workstreams are designed to ensure that the Board operates in compliance with the Pension Regulator's Code of Practice for Pension Boards.
3. The list of activities is not exhaustive and has evolved over the last 12 months and will continue to do so over the coming months.

RECOMMENDATIONS

4. That the Board considers the workstreams that are set out in this report.

WORKSTREAMS

5. **Appendix 1** of this report sets out the workstreams proposed for the Pension Board over the short-to-medium term.
6. The workload aims to meet the requirements of the Code of Practice for Pension Boards and has therefore been shaped into three broad areas:-

Governance, Administration and Communication

7. The elements that are timetabled to be reported upon at this meeting are set out below:-

- **Governance**

- G3 workstream – Training

- Training has been delivered at regular points since the inception of the Board in July 2015.

- In September 2017 a training session for Pension Board Members and Officers was delivered by colleagues from LGA Pensions and the Pensions Regulator and more recently training in relation to tax was delivered in October 2019.

- In June 2020, the Scheme Advisory Board delivered Pension Board Wrap up Training.

- In March 2021, a training session on the role of the Local Pension Board in the age discrimination remedy was delivered to Pension Board Members by colleagues at the Local Government Association.

G5B workstream – Summary of Complaints Received

A clear process for complaints has been adopted and is a key component of the governance of the Firefighter Pension Schemes (FFPS).

There were no complaints in relation to our administration of the FFPS in 2016/17 or 2017/18. There was one complaint in 2018/19 which has been concluded and one in 2019/20 which is being investigated by the Pensions Ombudsman. There were three complaints in 2020/21, two have been concluded and one is being investigated by the Pensions Ombudsman. There was one complaint in 2021/22 which has now been resolved. There have been two complaints in 2022/23 to date which are being investigated.

G6 workstreams – Risk Register

The Authority's team involved in the operation of the FFPS have developed a comprehensive Risk Register attached at **Appendix 2**.

The Risk Register identifies the three most dominant risks in Risk Areas 1, 2 and 3 as the maintenance of Member data (Risk 2), cyber security breaches (Risk 4), over reliance on key pensions administration officers (Risk 8), and also legislative change (Risk 9).

These risks reflect the recent significant changes in the FFPS which have brought a much greater emphasis on the completeness and accuracy of data and a number of fundamental scheme changes and legal rulings.

Risks specifically relating to the effects of the Covid 19 pandemic were assessed and included in the Risk Register in Risk Area 4. The most dominant risk is the late payment of benefits (Risk 11).

These risks reflect the different working practices that had to be adopted to ensure the ongoing administration of the scheme during the pandemic.

All of these risks will be monitored carefully, and it is felt that the mitigations and controls in place at present are sufficient.

- **Administration**

A1 workstream – KPIs and Benchmarking, SLAs

The Service has an agreed set of Key Performance Indicators (KPIs) with West Yorkshire Pension Fund (WYPF) who act as administrators of the FFPS on our behalf.

The KPIs are monitored and reported on monthly. **Appendix 3** sets out the position for quarter 1, quarter 2 and quarter 3 of 2022/23.

The data shows good performance in most of the key areas.

The KPIs provide a sound basis on which to manage performance going forward.

A2 workstream – Costs per Member and Number of Scheme Members

Appendix 4 sets out the latest position of scheme members currently contributing to the 2015 Scheme and those in receipt of a pension. This information will be brought to each Board meeting.

- **Communication**

C1 workstream – Communication by Scheme

The most recent member communication issued by West Yorkshire Pension Fund is attached at **Appendix 5**.

C5 workstream – Communication by the Scheme Advisory Board

The most recent Scheme Advisory Board Bulletins are attached at **Appendix 6**.

STRATEGIC PLAN COMPATIBILITY

8. No direct issues arising.

FINANCIAL/RESOURCES/VALUE FOR MONEY IMPLICATIONS

9. No direct issues arising.

LEGAL IMPLICATIONS

10. The workstreams outlined in this report will ensure that HFRS can run a legally compliant Pension Board.

EQUALITY IMPACT ASSESSMENT/HR IMPLICATIONS

11. No direct issues arising.

CORPORATE RISK MANAGEMENT IMPLICATIONS

12. No direct issues arising.

HEALTH AND SAFETY IMPLICATIONS

13. No direct issues arising.

COMMUNICATION ACTIONS ARISING

14. No direct issues arising.

DETAILS OF CONSULTATION AND/OR COLLABORATION

15. No direct issues arising.

BACKGROUND PAPERS AVAILABLE FOR ACCESS

16. Papers as attached.

RECOMMENDATIONS RESTATED

17. That the Board considers the workstreams that are set out in this report.

Officer Contact: Kevin Wilson ☎ 01482 567183
Executive Director of Finance/S151 Officer

K WILSON

Humberside Fire & Rescue Service
Summergroves Way
Kingston upon Hull

KW/SK

10/01/2023

PENSION BOARD – PROPOSED WORKSTREAMS

	Workstream	Progress	Report to Pension Board		
			Previous	Today	Future
GOVERNANCE					
G1	Establish the Pension Board	Completed	July 2015	-	-
G2	Code of Practice	Circulated and discussed at the January 2016 meeting - Completed	January 2016	-	-
G3	Training	Ongoing with initial training completed July/August 2015 and further training in April 2016 and March 2017 LGA training September 2017 WYPF training July 2018 Tax training October 2019 Pension Board Wrap up Training June 2020	July 2015 June 2016 January and July 2017 January and July 2018 January and July 2019 January and July 2020 February and July 2021 January and July 2022	Jan 2023	Ongoing
G4	Knowledge	Knowledge matrix as a basis on which to identify Pension Board Members' knowledge gaps circulated at January and June 2016 meetings and at April 2016 Pension Board Training	January and June 2016 and January 2017	-	-
G5A	Complaints	Flowchart for the current complaints procedure for the FFPS circulated and discussed at January 2016 meeting. Procedure updated October 2020.	January 2016	February 2021	-
G5B	Summary of Complaints received	Complaints received in 2015/16 circulated. No complaints in 2016/17 and 2017/18, one complaint in 2018/19 (concluded) one in 2019/20 (under investigation by the Pensions Ombudsman). Three complaints in 2020/21 (two concluded, one being investigated by the Pensions Ombudsman). One complaint in 2021/22 (resolved). Two complaints in 2022/23 (under investigation).	June 2016 January and July 2017 January and July 2018 January and July 2019 January and July 2020 February and July 2021 January and July 2022	Jan 2023	Each Pension Board
G6	Risk Register	The Risk Register is updated on an ongoing basis.	June 2016 January and July 2017 January and July 2018 January and July 2019 January and July 2020 February and July 2021 January and July 2022	Jan 2023	Each Pension Board
G7	Policies	Abatement Policy published December 2020	February 2021	-	When published

ADMINISTRATION					
A1	KPIs and Benchmarking, SLAs	KPIs are reported monthly.	June 2016 January and July 2017 January and July 2018 January and July 2019 January and July 2020 February and July 2021 January and July 2022	Jan 2023	Each Pension Board
A2	Costs per member and number of scheme members	Reported to January 2016 Board and each Board thereafter	June 2016 January and July 2017 January and July 2018 January and July 2019 January and July 2020 February and July 2021 January and July 2022	Jan 2023	Each Pension Board
A3	Data for CARE and data quality	The recent move to the new ERYC payroll system has facilitated the production of this information by 31 March 2016 - Completed	June 2016	-	-
A4	Pension expenditure	Compiled as part of the Annual Accounts	June 2016 July 2017 July 2018 July 2019 July 2020 July 2021 July 2022	Jan 2023	July 2023
COMMUNICATION					
C1	By Scheme	Latest publication presented to meetings	January 2016, January and July 2017 July 2018 July 2019 July 2020 July 2021 July 2022	Jan 2023	When published
C2	By the Service	Latest publication presented to January 2016 meeting	January 2016	-	When published
C3	Benefit Statements	Issued week commencing 19 December 2016 and August 2017, 2018 and 2019	January 2017	-	-
C4	Calculators	Circulated at the April 2016 Pension Board Training and now on the Authority's website - Completed	April 2016 Pension Board Training	-	-
C5	By the SAB	Latest publications presented to July 2021 meeting	July 2020 February 2021 and July 2021 January and July 2022	Jan 2023	When published

Firefighters' Pension Scheme - Administration Risk Register									
Risk Assessment Form									
Organisation: Humberside Fire & Rescue Service									
Scheme Manager: Delegated to Executive Director of Corporate Services and s151 Officer									
	Risk	Assessment of Risk			Risk Control Measures	Owner	Test	Next Review	Comment
	Risk Area 1 - Operations	Likelihood	Impact	Risk Rating					
1	Operational disaster (fire, flood etc)	1	4	4	Business continuity plans in place for Pension Administrator	Senior Finance Officer	Annual	Jul-23	
					Business continuity plans in place for Scheme Manager	Senior Finance Officer	Annual	Jul-23	
2	Member data incomplete or inaccurate	3	3	9	Annual report from Pension Administrator used as basis for rectification/data cleansing plan	Senior Finance Officer	Annual	Jul-23	Regular data checks as part of monthly returns process. Procedures being developed to accurately capture and report on industrial action data
					Returns from annual statements, Life Certificate checks, and National Fraud Initiative checks	Pension Admin	Annual	Jul-23	
3	Administration process failure/maladministration	1	2	2	Formal agreement in place with administrator, including SLAs	Senior Finance Officer	Annual	Jul-23	KPIs subject to quarterly review
					Authority levels clearly agreed and kept up to date	Scheme Manager	Annual	Jul-23	
					Review independent reports of administrator's process	Scheme Manager	Annual	Jul-23	
					Ongoing dialogue with administrator	Senior Finance Officer	Ongoing	Ongoing	
					Contract meetings between Pension Administrator and Senior Finance Officer	Senior Finance Officer	Quarterly	Ongoing	
4	Cyber security breaches	3	4	12	Supporting good decision making and minimising the risk of scams in line with The Pension Regulator's Guidance	Scheme Manager	Ongoing	Ongoing	

	Risk Area 2 - Financial	Likelihood	Impact	Risk Rating					
5	Excessive charges by supplier	3	2	6	Annual review of scheme budget, review of costs incurred against budget	Senior Finance Officer	Annual	Jul-23	Charges may increase with additional work required as a result of McCloud/Matthews judgments
					Periodic review of supplier	Senior Finance Officer	Annual	Jul-23	
6	Incorrect employee and employer contributions	1	5	5	Check incoming and outgoing scheme funds against scheme forecast - reconciling all funds	Senior Finance Officer	Monthly	Jul-23	
					Monitoring of contribution payments	Senior Finance Officer	Monthly	Jul-23	
					Annual audit	Head of Finance	Annual	Jul-23	
7	Judicial review of cost cap	4	4	16	Awaiting outcome of judicial review in order to determine risk control measures needed	Head of Finance	Annual	Jul-23	Accrual rates and contribution rates may increase as a result of judicial review
	Risk Area 3 - Regulatory & Compliance	Likelihood	Impact	Risk Rating					
8	Over reliance on key pensions administration officers	3	3	9	Key officers convey specialist knowledge on to colleagues by mentoring	Senior Finance Officer/ Pensions Admin	Ongoing	Ongoing	Additional work caused by McCloud/Matthews may pull key officers away from routine work resulting in potential administrative errors
					Enhance training by bespoke sessions/courses/workshops	Senior Finance Officer/ Pensions Admin	Ongoing	Ongoing	
9	Changes to legislation	5	4	20	Ongoing review of legislative framework	Scheme manager	Ongoing	Ongoing	McCloud/Matthews judgments will result in legislative changes
					Up to date and documented training log, showing completion of scheme specific and	Scheme manager	Ongoing	Ongoing	
					Technical advice and updates	Scheme manager	Ongoing	Ongoing	
10	Delayed Annual Benefit statements (Special Modified Scheme)	2	2	4	Submission of monthly data, and timely submission of year end data	Senior Finance Officer/ Pensions Admin	Ongoing	Ongoing	
11	Conflicts of interest	2	1	2	Pension board awareness of legal responsibilities	Scheme Manager	Ongoing	Ongoing	
					All pension board members to declare any conflicts and potential conflicts	Scheme Manager	Ongoing	Ongoing	

	Risk Area 4 - Covid-19	Likelihood	Impact	Risk Rating					
11	Late payment of benefits (including processing death and survivor benefits)	3	3	9	Pension payroll operating fully on a remote basis and subject to ongoing review and	Scheme Manager	Ongoing	Ongoing	
12	Delay in processing retirements	2	3	6	Prioritising retirement processing in accordance with The Pension Regulator's Guidance	Scheme Manager	Ongoing	Ongoing	There may be a slight delay in the payment of retirement lump sums due to payroll processes running weekly, but payment will still be processed within time limits set out in pension legislation
13	Delayed Annual Benefit Statements	3	2	6	Submission of monthly returns ongoing	Scheme Manager	Ongoing	Ongoing	No delay in Annual Benefit Statement production, with 100% meeting the statutory deadline

Risk Matrix

The following model rates the impact and likelihood of an identified risk using a scale of 1 to 5.

The likelihood score is multiplied by the impact score (as shown in the table) to give an overall risk score.

The final score will influence the level of monitoring and/or control required in relation to each risk.

Likelihood Score	1	2	3	4	5
Descriptor	Rare	Unlikely	Possible	Likely	Almost Certain
Frequency How often might it/does it happen	This will probably never happen/recur	Do not expect it to happen/recur but it is possible it may do so	Might happen/recur occasionally	Will probably happen/recur, but it is not a persisting issue/circumstance	Will undoubtedly happen/recur, possibly frequently

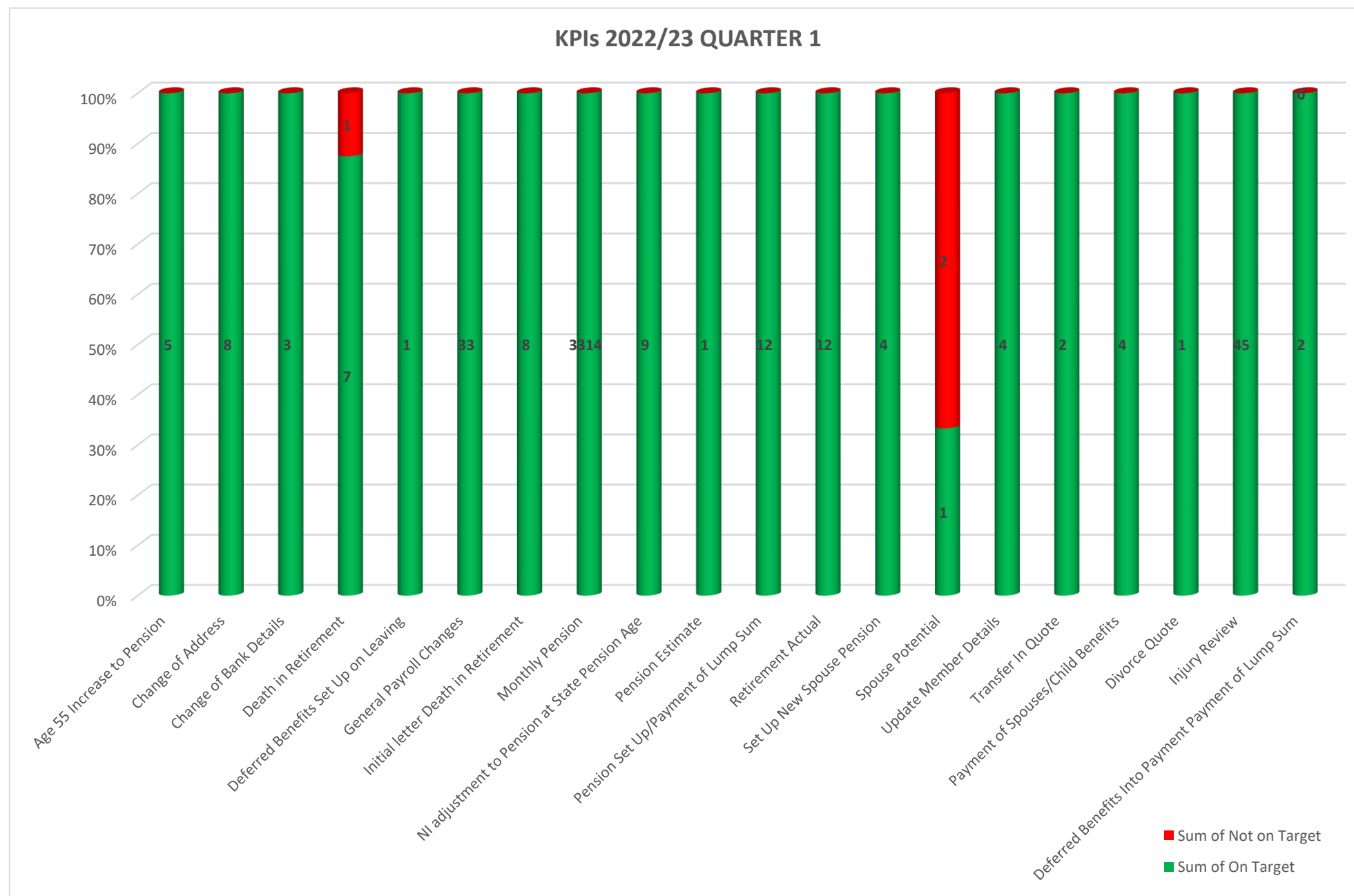
Impact Score	1	2	3	4	5
Descriptor	Negligible	Minor	Moderate	Major	Catastrophic
Risk Area 1 - Operations	Minor problem easily handled by normal day to day processes	Potential for some operational disruption	Significant operational disruption possible	Operations severely damaged	Operational survival at risk
Risk Area 2 - Financial	Little/no financial impact	Potential for short term financial impact	Potential for medium term financial impact	Potential for long term financial impact	Potential for permanent long term financial impact
Risk Area 3 - Regulatory & Compliance	Little/no impact	Misunderstanding of rules/regulations resulting in reduced performance	Breach of rules/regulations resulting in informal complaint(s)	Breach of rules/regulations resulting in formal report or complaint(s) being lodged	Breach of rules/regulations resulting in legal action
Risk Area 4 - Covid 19	Minor problem easily handled by normal day to day processes	Potential for some disruption to normal processes	Significant disruption to normal processes possible	Normal processes severely disrupted	Operational survival at risk

	Likelihood Score				
Impact Score	1	2	3	4	5
5 Catastrophic	5	10	15	20	25
4 Major	4	8	12	16	20
3 Moderate	3	6	9	12	15
2 Minor	2	4	6	8	10
1 Negligible	1	2	3	4	5

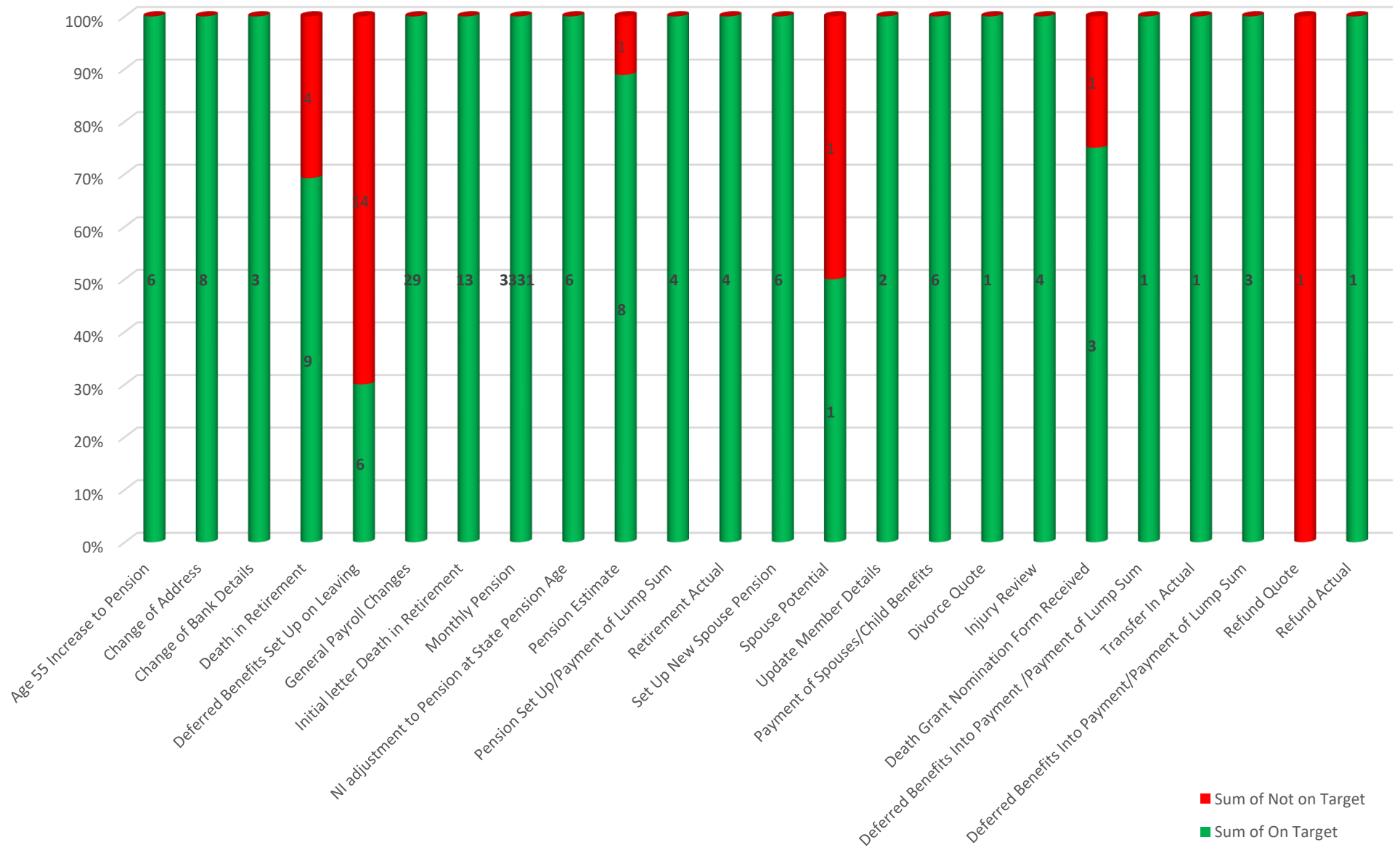
	1 to 3	Low risk
	4 to 6	Moderate risk
	8 to 12	High risk
	15 to 25	Extreme risk

KPI Details

Number	Key Performance Indicator	Target	Minimum
1	Additional Pension Contributions Update	10	85%
2	Age 55 Increase to Pension	20	85%
3	Change of Address	20	85%
4	Change of Bank Details	20	85%
5	Death Grant to Set Up	10	85%
6	Death in Retirement	10	85%
7	Death In Service	10	85%
8	Death on Deferred	10	85%
9	Deferred Benefits Into Payment – Payment of Lump	3	85%
10	Deferred Benefits Into Payment Actual	5	90%
11	Deferred Benefits Into Payment Quote	35	85%
12	Deferred Benefits Set Up on Leaving	20	85%
13	Dependant Pension To Set Up	10	100%
14	Divorce Actual	20	85%
15	Divorce Quote	40	85%
16	Divorce Settlement – Pension Sharing order Implemented	80	100%
17	DWP Request For Information	20	85%
18	General Payroll Changes	20	85%
19	Initial letter Death in Retirement	10	85%
20	Initial Letter Death in Service	10	85%
21	Initial letter Death on Deferred	10	85%
22	Injury Review	20	100%
23	Life Certificate	10	85%
24	NI adjustment to Pension at State Pension Age	20	85%
25	Pension Estimate	10	90%
26	Pension Saving Statement	20	100%
27	Pension Set Up/Payment of Lump Sum	3	85%
28	Purchase of Service Quote	20	85%
29	Refund Actual	10	90%
30	Refund Quote	35	85%
31	Retirement Actual	10	90%
32	Set Up New Spouse Pension	5	85%
33	Transfer In Actual	35	85%
34	Transfer In Quote	35	85%
35	Transfer Out Payment	35	85%
36	Transfer Out Quote Fire	35	85%
37	Update Member Details	20	100%



KPIs 2022/23 QUARTER 2





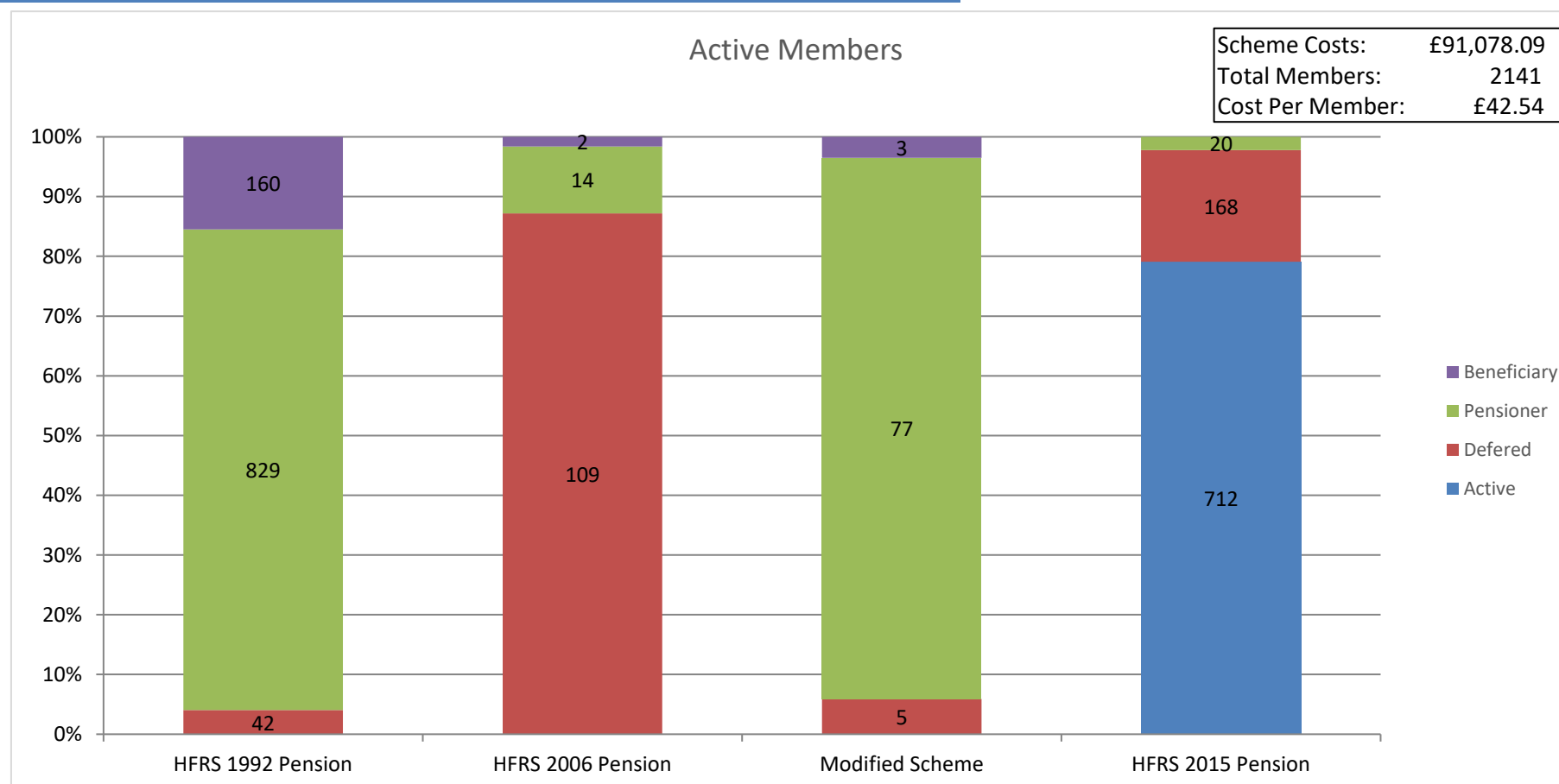
Firefighters' Pension Scheme - Number of Members and Adminstration Cost Per Member as at 31/12/2022

Total Members

Total Members				
Scheme Name	Active	Deferred	Pensioner	Beneficiary
HFRS 1992 Pension	0	42	829	160
HFRS 2006 Pension	0	109	14	2
Modified Scheme	0	5	77	3
HFRS 2015 Pension	712	168	20	0
Total	712	324	940	165
Grand Total				2141

Total Costs

Service	Cost
HFRS Salary	£54,901.65
Administration	£20,146.06
Payroll	£16,030.38
Total	£91,078.09



£42.54



West Yorkshire Pension Fund

SUMMER 2022 ● ACTIVE FIREFIGHTER MEMBERS

Pension

NEWSLETTER

Your 2022 pension statement is ready

Your pension statement is available now in your **My Pension** account. If remedy doesn't apply to you, your statement is correct and up-to-date.

You were a member of FPS 1992 or FPS 2006

Your pension statement is available now in your My Pension account. **But your 2022 statement does not take remedy into account and can't show future projections because of this.**

When will my statement show remedy?

On the next page we cover the facts about **remedy** and how your future pension statements will look.

We can't show you the effects of remedy at the moment because the legislation needed to put you back into your legacy scheme (1992 or 2006) won't come into force until 1 October 2023. When it does you'll be put back into your legacy scheme for the **remedy period** of 1 April 2015 to 31 March 2022, and we hope you will then see the effect of that on your **2024** statement, available by the end of August 2024. Please note that the anticipated date of 2024 depends on the legislation, and associated software development, being available on time.

Remedy

What's happened so far – what's still to come

All serving firefighters moved to FPS 2015 on 1 April 2022.

Further measures are expected in October 2023 that will place eligible members back in their legacy scheme for the remedy period, with a choice at retirement as to which benefits to take.

Background

In 2015, new laws introduced a new scheme for firefighters – the Firefighters' Pension Scheme 2015 (FPS 2015). These laws included protections which meant that some members of the existing schemes (FPS 1992 and FPS 2006) didn't join FPS 2015 either straight away or at all, depending on their age. Following a legal challenge known as *Sargeant*, the courts determined that the protections given to members were age discriminatory.

All protected members who joined the scheme before April 2015 were moved to the FPS 2015 for service after 1 April 2022.

If you joined the scheme on or after 1 April 2022, none of the above will apply to you.



It's time to go online

View your pension record and your statements with our online My Pension service

Register today at www.wypf.org.uk/register

How remedy is being dealt with

Remedy is being dealt with in two parts: **prospective** and **retrospective** remedy.

1. Prospective remedy

This is the part that led to all members being moved to FPS 2015 from April 2022. If this applies to you, we've already written to tell you about it. From 1 April 2022 all those who continue in service will do so as members of the reformed scheme, regardless of age, meaning all members will be treated equally in terms of future pension provision.

2. Retrospective remedy

Retrospective remedy measures – when they arrive – will correct the period of discrimination from 1 April 2015 to 31 March 2022 by putting protected members back into their legacy scheme for the **remedy period** of 1 April 2015 to 31 March 2022.

If you are a protected member who was moved to FPS 2015, you'll then get a choice (when you leave or retire) – called the **Deferred Choice Underpin** – about how you receive the pension benefits for your membership between 1 April 2015 and 31 March 2022. The choice will be between benefits based on your former scheme rules (called **legacy** benefits) or the FPS 2015 rules (called **reformed** benefits).

Future pension statements

Based on current expectations, every eligible member will receive an annual statement with an overview of their benefits for the remedy period – for both the legacy and reformed schemes – in addition to the usual current values and projections members are used to.

From **1 April 2025** a 'remedial statement', issued each year, will detail what the member's benefits would be for the remedy period in both the legacy and reformed scheme. We don't now yet whether this will be included in the usual statement or if it will be an extra statement.

What's my contribution rate for 2022/23?

Your rate and pay band for 2022/23 will be the same as it was in 2021/22 and the year before that. This is because the latest scheme valuation has not yet been completed.

The contribution rate you pay depends on which scheme you're in, as shown below and is based on your full-time equivalent rate of pay.



CARE PENSIONS UP 4.1%

The adjustment to your CARE pension for 2022 is an increase of 4.1%

When is this increase added to my pension?

The annual revaluation is applied to pension accounts for scheme members who were contributing to FPS 2015 for at least part of the year up to and including 31 March. If you joined FPS 2015 on 1 April 2022 then you won't receive this year's adjustment.

Otherwise, a 4.1% increase was applied to your pension on 1 April 2022. If you're wondering why your 2022 pension statement doesn't show it, that's just because the 2022 statement can only show your pension up to the day before we added this year's increase. It will be your 2023 statement that shows your pension with the 4.1% increase added.

About the adjustment

Every April we adjust the pension you've built up so far in line with the Treasury Department's Revaluation Order, currently set by the Average Weekly Earnings (AWE) for the September before the increase date.

Pensionable pay	Rate
(Rate is % of pensionable pay)	
Up to £27,818	11.0%
£27,819 to £51,515	12.9%
£51,516 to £142,500	13.5%
£142,501 or more	14.5%

Can I increase my benefits?

Your pension statement is a guide to the income you can expect when you retire. If you would like a bigger income in retirement, you can boost your pension by buying **additional pension**.

You can do this either by making increased monthly contributions or paying a lump-sum payment (a lump sum payment is only possible if you joined the scheme within the previous 12 months). The extra pension benefits you buy are held in an **added pension account**, and keep pace with inflation just like your main pension account. For more information visit the FPS member website at <https://fpsmember.org/fps-2015/can-i-increase-my-pension>. If you are still interested contact WYPF for a quote.

Time limits for transfers

TRANSFERS IN – When you join the pension scheme you have one year to transfer personal pension benefits into the scheme, after which your FRA may not allow it. If this applies to you, speak to them about their policy on this. You can transfer from *occupational* schemes at any time.

TRANSFERS OUT – Remember that if you want to transfer your fire pension to another provider, you must leave this scheme and choose to transfer your pension at least one year before your **normal pension age**. The rules also restrict where you can transfer fire scheme pensions to, so if you're considering it, please see www.wypf.org.uk/firefighters or give us a call.

HMRC allowances

Your statement shows you how much of your lifetime and annual allowances you have used for tax purposes. Even if you don't think of yourself as a 'high earner' you should bear these tax limits in mind because you may need to seek specialist independent advice.

2022/23 tax year

Annual allowance – £40,000

This is the amount the value of your pension benefits can increase in any one year without you having to pay a tax charge. If the value of your pension savings in any one year (including pension savings outside the FPS) are more than the annual allowance, the excess may be taxed as income.

Tapered annual allowance – £10,000 to £4,000

The annual allowance 'taper' gradually reduces the allowance to a minimum of £4,000 for people with threshold income* above £200,000 and adjusted income** above £240,000 a year.

*Threshold income – taxable income not including contributions to a pension scheme.

**Adjusted income – taxable income not including contributions to a pension scheme plus the growth on pension savings each year.

Lifetime allowance – £1,073,100

The total value of all pension benefits (at the point you are paid them) you can have without triggering an excess benefits tax charge. If the value of your pension benefits when you draw them (not including state retirement pension, pension credit or partner or dependant's pension you may be entitled to) is more than the lifetime allowance, or more than any protections you have, you'll pay tax on the excess benefits. Pension benefits in all tax-registered pension arrangements are included in the assessment.

For more information about these allowances, see www.wypf.org.uk/allowances

FPS 1992 members

Re-employment after retiring

The minimum age you can now take a pension is age 55, except for FPS 1992 members who are partially protected and can still retire from age 50. If you take pension before age 55 and you are re-employed, you could lose protected rights and be taxed on your pension benefits. If you're thinking about getting another job after taking your pension before age 55, see the 'abatement' and 'protected pension age' information www.wypf.org.uk/firefighters/ppa first.

We will now mostly communicate with you through electronic methods, like email, our website and the My Pension service.

But don't worry – if you don't have access to the internet or prefer not to use our online services we can continue to send you paper copies of important pension information on request.

A short guide to death-in-service benefits

If you die as an active member of the pension scheme there are three types of benefit that your loved ones and dependants could receive.

- 1 **lump sum death grant**
- 2 **survivor pension**
- 3 **pension for your eligible children**

1 **lump sum death grant**

The lump sum death grant payable is

- 3 × pensionable pay

If you fill in an **expression of wish** form at www.wypf.org.uk/firefighters your FRA will know who you would want your death grant to go to. You don't have to do this but it can make paying the money to your loved ones quicker and simpler. Plus, by nominating, the death grant becomes exempt from inheritance tax.

Your annual benefit statement will confirm whether you have made a nomination and if so, who you nominated. You can change your nomination at any time by filling in a new expression of wish form.

2 **survivor pension**

- A pension for your husband, wife, civil partner or cohabiting partner.*

You no longer need to nominate your partner, but filling in a nomination form can make identifying and contacting them easier and quicker if you were to die, so is still worth doing. You can download the form from www.wypf.org.uk/firefighters

*If your partner is more than 12 years younger than you, the pension they get will be reduced.

3 **pension for your eligible children**

Eligible children are those who are

- under age 18, or
- under age 23 if they're in full-time education, or
- permanently disabled.

Pension scams

Pension scams continue to be a very real threat. They can take many forms and could be about insurance policies, pensions transfers, or high-return investment opportunities. Scammers are sophisticated and opportunistic and will try many things. They're very likely to target the vulnerable. As always, beware of investments that seem too good to be true.

Report suspected scams to Action Fraud straightaway on **0300 123 2040** or with the online reporting tool at www.actionfraud.police.uk/reporting-fraud-and-cyber-crime.

How to contact us

Phone 01274 434999

Monday to Friday 8.45am to 4.30pm

Email pensions@wypf.org.uk

Postal address

PO Box 67

Bradford

BD1 1UP

You can visit our office in Bradford too but please contact us first to make an appointment.

FPS Bulletin 58 – June 2022

Welcome to issue 58 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.

Contents

Calendar of events	2
Actions arising	3
FPS	3
Home Office collection of FPS forecasts for 2022-23 to 2027-28	3
Matthews – Lessons learned	4
Immediate Detriment Framework costing and assumption guidance	5
Bluelight inbox and query form	5
Annual Benefit Statements 2022 – Information factsheet	7
Technical query log	7
FPS England SAB updates	7
SAB respond to HM Treasury's letter	7
Other News and Updates	8
DWP call for evidence – helping savers understand their pension choices	8
Further consultation on Pensions Dashboards launched	8
PDP update	9
TPR Deadline Campaign for Pensions Dashboards	9
TPR corporate plan 2022 to 2024	10
TPR blog on pensions scammers	11
State pension triple lock reinstated	11
Job vacancies	12

Vacancy at Nottinghamshire Fire and Rescue Service	12
Vacancy at West Midlands Fire Service	12
Vacancy at London Fire Brigade	12
Vacancy at West Sussex County Council	13
Events	13
FPS coffee mornings	13
Useful links	13
Contact details	14
Copyright	14
Disclaimer	15

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 and 26 July
FPS Technical Group	18 July 2022
North-East regional group	17 August 2022
SAB	8 September 2022
North-West regional group	14 September 2022
FPS Communications Working Group	16 September 2022
FPS Technical Group	25 October 2022
FPS AGM (Save the date)	25 and 26 October 2022
SAB	8 December 2022

Actions arising

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

[Home Office collection of FPS forecasts](#): FRAs to submit pension income/expenditure forecasts by 19 August 2022.

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

FRAs and administrators to complete query form when submitting a technical query.

[Annual Benefit Statement 2022 – Information factsheet](#): Administrators to include ABS factsheet with 2021/22 benefit statement distribution.

[TPR dashboard guidance](#): FRAs to read dashboard guidance and book onto webinar.

FPS

Home Office collection of FPS forecasts for 2022-23 to 2027-28

On 21 June 2022, the Home Office emailed all FRAs in England to request submission of their pension income/expenditure forecasts for the period 2022-23 to 2027-28.

The formal commissioning letter at [Appendix 1](#) sets out the centrally prescribed assumptions that must be applied when calculating pension income and expenditure forecasts. The forms can be accessed on DELTA from 1 July 2022. The deadline for submissions is Friday 19 August 2022.

FRAs are also required to complete the Excel table at [Appendix 2](#) in order to declare the local assumptions that they have applied to calculate their pension estimates. The prescribed assumptions that FRAs should use for CPI percentage increases, pay increases and employer contribution rates for the forecasting period have already been pre-populated on the table.

[Click here to return to Contents](#)

Please note that payment of the 2022 Top Up grant will be conditional on its completion and incomplete tables will be returned to FRAs.

For the avoidance of any confusion, there are **two returns required by 19 August 2022**:

1. The online DELTA returns setting out the 6-year forecast of pension income and expenditure.
2. Assumptions returns (email direct to anthony.mooney@homeoffice.gov.uk attaching the completed table above).

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

Matthews – Lessons learned

The Home Office has recently shared with us a [draft document which outlines the lessons learned](#) from the first special members' options exercise.

This high-level paper has been produced for stakeholders involved in Matthews Remedy work. The purpose of this paper is to identify the areas of improvement from the previous remedy project and how to implement the lessons identified. The lessons referenced are drawn from the experience and reflections of the Home Office, Government Actuary Department and Local Government Association on Matthews Remedy options exercise which took place between April 2014 and September 2015.

Stakeholders had opportunity to discuss the key points from the paper at our latest [coffee afternoon session on 28 June 2022](#).

Feedback is welcomed from the sector as to whether anything is missing from the document which should have been captured. Please send any thoughts and suggestions through to the Bluelight inbox (bluelightpensions@local.gov.uk).

[Click here to return to Contents](#)

Immediate Detriment Framework costing and assumption guidance

On 26 May 2022, the LGA in collaboration with Ian Hayton, Cleveland FRS CFO and NFCC pensions lead, hosted a session via MS Teams relating to the Financial Assessment for Immediate Detriment. The session was open to all FRAs, and the invite was shared with CFOs.

The LGA has been working closely with Cleveland FRS to establish a calculator which should enable FRAs to estimate their financial liabilities when considering adoption of the Framework.

The session was designed to provide participants with an overview of the financial assumption spreadsheets. The LGA provided attendees with an explanation of the spreadsheets which included how each column interacts with the final data as well as a demonstration on how to complete the spreadsheet.

It was agreed at this meeting that the LGA would prepare some guidance for FRAs on how they can effectively use the spreadsheet. We are pleased to confirm that the guidance, along with template spreadsheets, has now been published and is available to access via the [age discrimination page in the member protected area](#) of the FPS Regulations and Guidance website.

Before using the spreadsheet, it is worth noting that it has been designed to provide FRAs with a basic estimate of their financial exposure; it does not cover every eventuality and it is based on the LGA's current understanding of what the main financial liabilities are.

Bluelight inbox and query form

Now that the Bluelight team is up to full strength please can we ask that all queries are sent to the generic Bluelight inbox (bluelightpensions@local.gov.uk). This will enable the most appropriate team member to respond as well as ensuring that queries can be dealt with when someone is on leave.

In addition, please can we remind readers of the process to follow when submitting a technical query. [FPS Bulletin 9](#) confirmed that a query form had been developed which asks for information in the following areas:

[Click here to return to Contents](#)

- Details of your query
- Area of uncertainty / challenge
- Proposed solution
- Research undertaken: Relevant legislation, HMRC guidance, relevant websites, historical background (circulars or technical meeting minutes), legal advice [Include links]
- Indication of amounts (£) involved
- Timescales involved
- Other supporting evidence

Receiving queries in this way allows us to build up a picture of frequently asked questions and ensure greater consistency in our responses. We can build up a knowledge bank of resources and be able to more easily identify common areas of uncertainty, where dedicated training or workshops could be offered.

The form and notes for completion are available on the [technical queries page](#) of the FPS Regulations and Guidance website. Once completed, the form should be submitted to bluelight.pensions@local.gov.uk. Your query will be acknowledged upon receipt, and we will aim to reply to your query within 28 days. If we cannot reply with a full response within 28 days, we will let you know and tell you when you can expect to receive a full reply from us.

Please note that we have taken the opportunity to move the technical queries page to the password-protected area of the website, as it intended as a dedicated resource for practitioners. Therefore, you will now need to log in to access the form and the log of previous queries.

ACTION: FRAs and administrators to use the Bluelight inbox for email correspondence with the Bluelight team.

FRAs and administrators to complete query form when submitting a technical query.

Annual Benefit Statements 2022 – Information factsheet

At the Fire Communications Working Group (FCWG) meeting on 13 June 2022 we discussed whether it would be beneficial to provide members who are affected by age discrimination remedy with any additional information alongside their annual benefit statement.

Although the notes clearly indicate that benefit statements cannot at this stage reflect remedy, the group thought that it would be prudent to provide members with an additional information note which outlines the timeframes associated with remedy.

The factsheet is available to access via the [guides and sample documents page](#) of the FPS Regulations and Guidance website, under the heading Annual Benefit Statements (ABS). All administrators are encouraged to send the document to members impacted by remedy, with the 2021/22 benefit statements.

Action: Administrators to include ABS factsheet with 2021/22 annual benefit statement distribution.

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: Commutation (page 19).

FPS England SAB updates

SAB respond to HM Treasury's letter

We reported in [FPS Bulletin 52](#) that the chair of the SAB had written an [open letter to HM Treasury \(HMT\) on the withdrawal of the Home Office informal guidance](#) on immediate detriment. The letter, dated 17 December 2021, asked for more information on the risks and uncertainties which HMT said arose as a result of processing cases ahead of legislation.

[Click here to return to Contents](#)

On 23 March 2022, [HMT provided a response outlining the factors behind the withdrawal](#) in more detail. The response highlighted that Section 61 of the Equality Act 2010 did not, in HMT's opinion, allow for amendment of a member's tax position. The response detailed several tax complexities which had been identified and will be dealt with through legislation.

On 20 June 2022, the chair of the SAB wrote an [open letter in response to HMT's reply](#) which seeks further clarity on the extent of Sections 61/ 62 and the tax implications detailed.

Other News and Updates

DWP call for evidence – helping savers understand their pension choices

On 14 June 2022, the Department for Work and Pensions (DWP) launched a [Call for Evidence entitled: 'Helping savers understand their pension choices'](#).

The call for evidence explores what support pension scheme members need to help them make informed decisions about how to use their savings.

DWP welcomes views from pension scheme members, consumer organisations, trustees, and scheme managers.

The consultation closes on 25 July 2022.

Further consultation on Pensions Dashboards launched

On 28 June 2022, DWP launched a further consultation on Pensions Dashboards: [Pensions dashboards: further consultation - GOV.UK \(www.gov.uk\)](#)

This further consultation supplements the consultation on the draft dashboard regulations which ran from 31 January 2022 to 13 March 2022. More information, including the LGA FPS response to that consultation, can be found on the [consultations page](#) of www.fpsregs.org.

[Click here to return to Contents](#)

The further consultation sets out two proposals. The first proposal provides clarity on the 'Dashboard Available Point' (DAP). The second proposal allows the Money and Pensions Service and the Pensions Regulator to share information about dashboards with each other.

The DAP is the point at which dashboards will be available to all members of the public. The consultation proposes that the DWP will decide on the DAP and then give pension schemes 90 days' notice. It is hoped that this will give schemes sufficient time to make final preparations.

The consultation is scheduled to run for 3 weeks and closes on 19 July 2022.

PDP update

Speaking at the Pensions Age Northern Conference and the PLSA Local Authority Conference Chris Curry, Principle of the Pensions Dashboards Programme (PDP), confirmed that:

- DWP is expected to respond to the consultation on the draft regulations for pensions dashboards before summer recess, with the regulations likely to be laid in parliament later this year.
- Dashboards are still on track for 2023, with less than 12 months until some schemes begin onboarding.
- Later in the year PDP will be running a further consultation on the specific standards for dashboards, which they will look to work with the industry through webinars and events.
- PDP has successfully tested an end-to-end version of the dashboards ecosystem and that the alpha phase of the project was complete.

TPR Deadline Campaign for Pensions Dashboards

The Pensions Regulator (TPR) has launched its new "Deadline" campaign urging trustees and scheme managers to start preparing for pensions dashboards.

[Click here to return to Contents](#)

It is expected that occupational pension schemes with 100 or more relevant members will connect to the pensions dashboards through a phased approach according to size and type of pension scheme. The first schemes will connect to the dashboards system by June next year and TPR will begin writing to them at least twelve months ahead of their connection deadline to alert them to what they need to do.

To help trustees and scheme managers get ready, TPR has published [Pensions dashboards: initial guidance](#) which outlines their legal duties, based on draft regulations, including a checklist to help track progress. TPR are urging the following:

- All schemes need to prepare, so it is vital that all schemes start to prioritise their duties and not leave them until the last minute-your pensions dashboard deadline is coming.
- Include pension dashboards as an agenda item at trustee board meetings.
- Decide how you will connect-i.e., using your current pensions administrator, an integrated service provider, or building your own connection solution.
- Check that the data you will use to match people with their pensions and return to the dashboard is available, accurate and assessable.

[Check your connection deadline and download a checklist](#)

TPR is hosting a webinar and Q&A on 28 July 2022 to take you through the steps you need to take to prepare for connection. [Register to save your place.](#)

TPR corporate plan 2022 to 2024

On 13 June 2022, [TPR published its corporate plan](#) for the next two years. Their [press release](#), confirms they will continue to:

- call on schemes to take its pledge to combat pension scams
- work closely with DWP and the Financial Conduct Authority (FCA) on a future consultation for a Value for Money Framework

[Click here to return to Contents](#)

- assess how smaller defined contribution schemes offer value for money
- help schemes become dashboard ready
- develop its organisational capability with the creation of a Digital, Data and Technology directorate
- launch its second consultation on a new defined benefit funding code this autumn, with the code operational from September 2023.

TPR blog on pensions scammers

On 15 June 2022, [TPR published a blog on pension scammers](#). The blog highlighted that tough prison sentences alone are not enough to dissuade all scammers and secure savers' pension pots.

TPR needs the pensions industry to make use of the new powers to block transfers they suspect are scams and, to report any suspected scams to the appropriate authorities.

TPR know scammers' methods will continue to evolve and are working with the National Fraud Intelligence Bureau to jointly [review the threat of pension scams](#).

Most importantly, schemes should [report concerns about scams to the authorities](#). To help do this effectively TPR and their partners have published [a guide to reporting pension scams](#).

The guide looks at:

- Why concerns about a scam should be reported
- What should be reported
- When report should be made
- Who a report should be made to
- What happens once a report has been submitted

State pension triple lock reinstated

Chancellor Rishi Sunak has confirmed that the [state pension triple lock will be reinstated next April](#) after it was put on hold last April. It is likely to be based on the September 2022 consumer price index, which is expected to be around 10 per cent.

[Click here to return to Contents](#)

Job vacancies

Vacancy at Nottinghamshire Fire and Rescue Service

Please find below details of a current vacancy for a Pensions Officer which is open to existing Nottinghamshire FRS employees and external applicants. The closing date for receipt of application forms is 17 July 2022.

“We are looking for a Pensions Officer, working part-time 3 days a week. This is an exciting opportunity for an experienced pension expert. You will provide advice and guidance to the Service on the Fire Pension Scheme (FPS) and Local Government Pension Scheme (LGPS). You will act as a technical expert and advise on pension regulations overseeing the implementation of legislative changes.

Further information and an online application form are available via our Recruitment Website at <https://jobs.notts-fire.gov.uk>”

Vacancy at West Midlands Fire Service

Please find attached below details of a current vacancy for a Pensions Practitioner at West Midlands Fire Service. The closing date for receipt of application forms is 12.00 on 7 July 2022:

[West Midlands Fire Service Pensions Practitioner Vacancy](#)

Vacancy at London Fire Brigade

As detailed in [FPS Bulletin 57](#), an opportunity has arisen to join the LFB as a Pensions Analyst. The role is to ensure they fulfil all statutory requirements and deal effectively with pension related issues as they impact on the London Fire Commissioner. The closing date for receipt of application forms is 7 July 2022:

[Finance Pensions Analyst \(london-fire.gov.uk\)](#)

Vacancy at West Sussex County Council

Please find attached below details of a current vacancy for a Pensions Adviser at West Sussex County Council. The closing date for receipt of application forms is 13 July 2022:

[Pensions Adviser West Sussex County Council](#)

Events

FPS coffee mornings

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

The next session is due to take place on 12 July 2022.

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

[14 June 2022 – TPR Governance and Administration survey results 2020-21](#)

[28 June 2022 – Matthews - lessons learned](#)

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](#)

[Click here to return to Contents](#)

- [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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[Click here to return to Contents](#)

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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.

Dear Claim Administrator

Please pass a copy of this letter to your FRA's Claim Approver

FINANCIAL ARRANGEMENTS FOR FIREFIGHTER PENSIONS - DELTA Returns: Pension Estimates 2022/23 – 2027/28

Introduction

- 1.1** FRAs are required to submit pension estimates for financial years 2022/23 to 2027/28. Please note that the deadline for returns to this is **cop Friday 19 August**.
- 1.2** The estimate for 2022/23 should be an update of the information previously submitted in August 2021. The estimate for 2023/24 will form the basis for the grant payment due in July 2023.
- 1.3** The July 2023 Top Up Grant payment will consist of **(i)** 80% of any forecast pension deficit for the year 2023/24, **(ii)** the remainder of the 2022/23 requirement (based on final unaudited accounts to be submitted in May 2023) and **(iii)** any adjustments needed in respect to 2021/22 (based on audited accounts also to be submitted in May 2023).

Assumptions

- 2.1** The estimates will also form the basis of this Department's bid for Annually Managed Expenditure (AME) grant to cover the cost of pension deficits. The forecasts will also be the subject of scrutiny by the Office of Budget Responsibility (a link to OBR's terms of reference is given below):

<http://obr.uk/topics/governance-and-reporting/>

FRAs are recommended to give due consideration to this when compiling forecasts and keep a record of the assumptions used e.g. for membership; leavers; ill-health etc.

- 2.2** Informal 'best practice' forecasting guidance produced by the Firefighters' Pension Forecasting Working Group has also been attached for FRAs to use when calculating their forecasts.
- 2.3** All policy changes from past fiscal events should be factored into the forecasts and the Consumer Prices Index (CPI) should be the measure of indexation. The following CPI rates advised by the OBR should be used (note that these are the uprating factors that should be applied to awards in the same year, reflecting CPI estimates from the previous September):

2022/23	3.1%
2023/24	7.5%
2024/25	3.4%
2025/26	1.6%
2026/27	1.9%

2027/28	2.0%
---------	------

FRAs should also apply the following paybill per head increases*:

2022/23	2.0%**
2023/24	2.6%
2024/25	1.8%
2025/26	2.3%
2026/27	2.7%
2027/28	2.7%

**we have assumed that 'pay drift' has no impact on the firefighters' workforce paybill and therefore the OBR assumptions have been reduced by 0.5%*

***HO has asked FRAs to assume a 2% pay inflation for 22/23 to ensure that there is a consistent approach to forecasting. It is not a reflection of what HO think should/will happen with pay negotiations.*

2.4 Returns **should** take account of:

- a. the current employee and employer contribution rates (reflecting the increases from April 2019) and its impact on workforce planning; and
- b. the changes to tax relief on annual and lifetime allowances and its behavioural impact of opt-outs.

2.5 Please also note that we are assuming that there is no impact on the firefighters' paybill from 'pay drift' – **please let us know if this is not the case for your FRA.**

2.6 For the purposes of these forecasts please **do not** reflect any impact from the McCloud/Sargent remedy and Matthews' remedy. We intend to undertake a central assessment of these costs and will feed these back separately to the OBR.

Assumptions exercise

3.1 Please **also note** that we will as a separate exercise be writing to Claim Approvers seeking details of the local assumptions applied in order to report these to the OBR. As part of this exercise, we will be asking FRAs to clarify the local assumptions that they have applied in respect of recruitment, scheme membership numbers, normal retirements, transfers in/out etc. The deadline for returns to this will also be **cop Friday 19 August**.

Action required

4.1 FRAs are requested to access DLUHC's DELTA online system and to complete the FPF form to provide forecasts for the years 2022/23 to 2027/28. The online form will be made available on the DELTA website from 1 July. You will receive an email advising when the online form has gone live and providing guidance on how to register, or how to access forgotten passwords, in due course.

Deadline for certification

5.1 The deadline for FRAs to complete and certify the form is **cop Friday 19 August 2022**.

Please note that we need the data so that we can respond to the OBR and have very limited ability to grant any extension to this deadline.

- 5.2** If you have any questions on this notification, or would like further information, please phone me on 0207 035 3372, 07504737245 or email anthony.mooney@homeoffice.gov.uk.

Kind Regards

Anthony Mooney

Name of Authority:

AME Fire Pension Forecasts 2022

Pension Deficit/Surplus Estimates 2022/23 to 2027/28 - Declaration of assumptions

	YEAR					
	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
CPI increases	3.1	7.5	3.4	1.6	1.9	2.0
1992 Scheme Employer contribution rate (%)	37.3	37.3	37.3	37.3	37.3	37.3
2006 Scheme Employer contribution rate (%)	27.4	27.4	27.4	27.4	27.4	27.4
2015 Scheme Employer contribution rate (%)	28.8	28.8	28.8	28.8	28.8	28.8
Modified Scheme Employer contribution rate (%)	37.3	37.3	37.3	37.3	37.3	37.3
% increase in future pay awards (%)	2.0	2.6	1.8	2.3	2.7	2.7
Number of active 1992 Scheme members						
Number of active 2006 Scheme members (FTE)						
Number of active Modified Scheme members (FTE)						
Number of active 2015 Scheme members (FTE)						
Expected number of normal retirements (all schemes)						
Expected number of Ill-health retirements (all scheme)						
Expected number of newly recruited members (all schemes)						
Expected number of pensioner deaths (all schemes)						
Average size of commutation lump sum (£)						
Average proportion of pension commuted (e.g. 25%)						
Expected no. of transfers out (all schemes)						
Expected no. of transfers in (all schemes)						
Expected no. of Opt-outs (all schemes)						

FPS Bulletin 59 – July 2022

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

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

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

Contents

Calendar of events	3
Actions arising	3
FPS	4
Administrator self-assessment survey results	4
FPS 2006 special members – Corrective action	5
Service history data for transitional FPS 2015 members	7
Age discrimination remedy - Data sharing	7
Duradiamond - Contract extension	8
Technical query log	9
FPS England SAB updates	9
FPS 1992 Scotland – commutation provisions	9
2020 Valuation assumptions	10
Contingent decisions	10
Membership, committees, and training	11
Software suppliers	11
Other News and Updates	11
Public Sector unions granted judicial review over McCloud cost remedy	11
TPO Annual Report and Accounts for 2021/22	12
TPO McCloud factsheet published	12
TPR Annual Report and Accounts for 2021/22	12

Dashboard Accuracy Data Guidance	12
DWP responds to consultation on the draft pensions dashboards regulations	13
LGA response to further consultation on pensions dashboards	14
PDP launches consultation and call for input on standards and guidance	14
Webinar for potential dashboard providers	16
Cyber Risk Made Simple Guide	16
HMRC	16
HMRC publishes Pension Schemes Newsletter 140 and 141	16
Clarification received on annual allowance changes	17
Legislation	19
The Public Service Pensions (Employer Cost Cap and Specified Restricted Scheme) Regulations 2022	19
Events	19
FPS coffee mornings	19
AGM – 25 and 26 October	20
Useful links	21
Contact details	22
Copyright	22
Disclaimer	22

Calendar of events

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

Table 1: Calendar of events

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

Actions arising

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

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

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

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

[Click here to return to Contents](#)

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

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

FPS

Administrator self-assessment survey results

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

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

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

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

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

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

[Click here to return to Contents](#)

FPS 2006 special members – Corrective action

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

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

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

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

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

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

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

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

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

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

Service history data for transitional FPS 2015 members

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

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

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

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

Age discrimination remedy - Data sharing

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

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

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

[Click here to return to Contents](#)

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

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

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

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

Duradiamond - Contract extension

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

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

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

PFMAB Administration Team

Cathy Golson – Team Leader

Lorna Nyajeka – Appeals Coordinator

Email: pfmab@healthpartners.uk.com

Tel: 01273 963729

[Click here to return to Contents](#)

Carole Scott – Relationship Manager

Email: carole.scott@healthpartners.uk.com

Tel: 01273 023042

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

Email: pfmabcontract@homeoffice.gov.uk

Technical query log

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

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

FPS England SAB updates

FPS 1992 Scotland – commutation provisions

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

[Click here to return to Contents](#)

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

2020 Valuation assumptions

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

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

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

Contingent decisions

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

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

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

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

Membership, committees, and training

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

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

Software suppliers

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

Other News and Updates

Public Sector unions granted judicial review over McCloud cost remedy

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

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

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

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

[Click here to return to Contents](#)

TPO Annual Report and Accounts for 2021/22

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

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

TPO McCloud factsheet published

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

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

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

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

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

TPR Annual Report and Accounts for 2021/22

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

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

Dashboard Accuracy Data Guidance

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

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

[Click here to return to Contents](#)

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

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

DWP responds to consultation on the draft pensions dashboards regulations

On 14 July 2022, the Department for Work and Pensions (DWP) [responded to the consultation on the draft Pensions Dashboards Regulations](#).

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

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

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

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

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

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

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

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

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

LGA response to further consultation on pensions dashboards

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

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

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

PDP launches consultation and call for input on standards and guidance

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

Standards and guidance

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

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

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

- connection guidance
- data usage guide
- early connection guidance

Call for Input on design standards

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

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

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

Support webinars

To support respondents, the PDP hosted three webinars:

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

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

Webinar for potential dashboard providers

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

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

Cyber Risk Made Simple Guide

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

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

HMRC

HMRC publishes Pension Schemes Newsletter 140 and 141

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

The newsletter includes articles:

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

[Click here to return to Contents](#)

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

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

The newsletter includes articles:

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

Clarification received on annual allowance changes

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

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

[Click here to return to Contents](#)

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

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

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

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

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

Legislation

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

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

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

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

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

Events

FPS coffee mornings

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

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

[Click here to return to Contents](#)

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

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

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

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

AGM – 25 and 26 October

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

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

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

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

[Click here to return to Contents](#)

Day 1 – Tuesday 25 October 2022 4:30pm - 6:30pm followed by drinks reception

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

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

Day 2 – Wednesday 26 October 2022 9:30am - 3:30pm

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

We look forward to welcoming you to the event!

Useful links

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

[Click here to return to Contents](#)

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[Click here to return to Contents](#)

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

FPS Bulletin 60 – August 2022

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

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

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

Contents

Calendar of events	2
Actions arising	2
FPS	3
Age discrimination eligibility – Factsheet	3
Abatement guidance updated	3
Electric vehicles salary sacrifice	4
Technical query log	4
FPS England SAB updates	5
SAB remedy engagement sessions	5
Other News and Updates	5
The Pensions Ombudsman (TPO) publishes corporate plan	5
The Pension Regulator (TPR) publishes scam prevention strategy	6
Draft LGA response to PDP consultation and call for input	6
Data matching guidance updated	7
Guidance on Value Data for pensions dashboards	7
Pension awareness campaigns	8
Events	8
FPS coffee mornings	8
AGM – 25 and 26 October	9
Useful links	10

Contact details	11
Copyright	11
Disclaimer	11

Calendar of events

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FPS Technical Group	25 October 2022
FPS AGM	25 October 2022 26 October 2022
SAB	8 December 2022

Actions arising

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

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

FPS

Age discrimination eligibility – Factsheet

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

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

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

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

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

Abatement guidance updated

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

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

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

[Click here to return to Contents](#)

Electric vehicles salary sacrifice

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

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

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

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

Technical query log

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

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

No new queries have been added this month.

FPS England SAB updates

SAB remedy engagement sessions

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

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

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

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

Other News and Updates

The Pensions Ombudsman (TPO) publishes corporate plan

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

The Pension Regulator (TPR) publishes scam prevention strategy

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

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

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

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

Draft LGA response to PDP consultation and call for input

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

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

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

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

[Click here to return to Contents](#)

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

Data matching guidance updated

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

Guidance on Value Data for pensions dashboards

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

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

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

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

Pension awareness campaigns

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

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

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

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

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

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

Events

FPS coffee mornings

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

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

[Click here to return to Contents](#)

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

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

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

AGM – 25 and 26 October

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

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

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

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

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

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

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

[Click here to return to Contents](#)

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

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

We look forward to welcoming you to the event!

Useful links

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

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[Click here to return to Contents](#)

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FPS Bulletin 61 – September 2022

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

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Contents

Calendar of events	2
Actions arising	2
FPS	3
Immediate Detriment Framework guidance updated	3
Potential industrial action	3
Member communications following eligibility factsheet	4
Technical query log	5
FPS England SAB updates	5
SAB levy 2022-23	5
SAB meeting 8 September 2022	6
SAB remedy engagement sessions	6
SAB collaboration sessions on the Matthews remedy	6
Other News and Updates	7
TPR scheme return	7
TPR warns employers about auto-enrolment duties	7
PDP consultation response	7
Public sector exit payments	8
Pensions awareness campaign postponed	9
HMRC	9
HMRC publishes Pension Schemes Newsletter 142	9

Events	10
FPS coffee mornings	10
AGM – 25 and 26 October	10
Useful links	11
Contact details	12
Copyright	12
Disclaimer	12

Calendar of events

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

Table 1: Calendar of events

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

Actions arising

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

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

FPS

Immediate Detriment Framework guidance updated

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

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

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

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

Potential industrial action

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

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

[Click here to return to Contents](#)

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

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

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

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

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

[Member communications following eligibility factsheet](#)

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

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

[Click here to return to Contents](#)

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

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

Technical query log

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

No new queries have been added this month.

FPS England SAB updates

SAB levy 2022-23

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

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

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

[Click here to return to Contents](#)

SAB meeting 8 September 2022

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

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

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

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

SAB remedy engagement sessions

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

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

The most recent sessions considered contributions and ill health.

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

SAB collaboration sessions on the Matthews remedy

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

[Click here to return to Contents](#)

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

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

Other News and Updates

TPR scheme return

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

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

TPR warns employers about auto-enrolment duties

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

PDP consultation response

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

[Click here to return to Contents](#)

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

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

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

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

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

Public sector exit payments

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

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

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

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

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

Pensions awareness campaign postponed

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

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

HMRC

HMRC publishes Pension Schemes Newsletter 142

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

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

[Click here to return to Contents](#)

Events

FPS coffee mornings

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

The next session is due to take place on 11 October.

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

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

[27 September 2022 – Matthews communications](#)

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

AGM – 25 and 26 October

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

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

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- The Home Office
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- Discretions
- Pensionable pay

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

We look forward to welcoming you to the event!

Useful links

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

[Click here to return to Contents](#)

- [Welsh Government Fire circulars](#)

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Contents

Calendar of events	3
Actions arising	3
FPS	4
Matthews – FPS member website update	4
Matthews – Member warm up communications	4
IQMP – Central list	5
Fire and Rescue workforce and pension statistics published	5
Technical query log	6
FPS England SAB updates	6
SAB remedy engagement sessions	6
SAB letter to scheme managers on pension dashboards	7
Other News and Updates	8

Public sector unions granted judicial review over McCloud cost remedy	8
A day in the life of The Pensions Ombudsman (TPO)	8
The Pensions Regulator (TPR) enforcement and prosecution policies updated	9
The Pensions Regulator (TPR) speech at PLSA conference	10
Pension Dashboards - Draft guidance on deferring staging date published	10
Pension Dashboards - Progress update report	11
Pension Dashboards - Videos published	11
Department for Work and Pensions (DWP) respond to further consultation on dashboards	11
Research on public value of dashboards published	12
Update on connecting early participants to the dashboard ecosystem	12
Financial Conduct Authority (FCA) warn that cost-of-living crisis could increase pension scams	13
September 2022 CPI rate announced	13
HMRC	13
Pension Schemes newsletter 143	13
Message from HMRC on the 2021/22 event reporting mechanism	14
Events	15
FPS coffee mornings	15
FPS AGM - Event summary	16
Legislation	20
Statutory Instruments	20
Draft dashboard regulations laid for approval	20
Useful links	21
Contact details	21
Copyright	22
Disclaimer	22

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Table 1: Calendar of events

Event	Date
FPS coffee morning	8 November 2022 and 22 November 2022
Midlands regional group	2 November 2022
South-West and Wales regional group	3 November 2022
South-East regional group	8 November 2022
North-East regional group	23 November 2022
Eastern regional group	5 December 2022
SAB	8 December 2022
FPS Communications Working Group	12 December 2022

Actions arising

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

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

FPS

Matthews – FPS member website update

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

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

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

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

Matthews – Member warm up communications

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

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

[Click here to return to Contents](#)

IQMP – Central list

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

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

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

Fire and Rescue workforce and pension statistics published

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

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

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

[Click here to return to Contents](#)

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

Technical query log

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

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

FPS England SAB updates

SAB remedy engagement sessions

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

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

[Click here to return to Contents](#)

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

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

SAB letter to scheme managers on pension dashboards

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

These duties include:

- Working towards the staging date. The Pensions Regulator (TPR) is keen that schemes start planning now to be able to match dashboard requests to scheme records and return the required information to the dashboard. Scheme managers will need to understand how their provider will be able to pick out those requests which correspond to their members and ensure that they are providing information to the right individuals.
- Ensuring the infrastructure is in place to hold and share data with the dashboard: Administrator should be able to tell scheme managers how they are planning to connect whether through the existing software providers or through some other route.

- Reviewing scheme data: The SAB understands that the data which is used for the dashboard is likely to be based on information currently being provided as part of Annual Benefit Statements (ABSs). The SAB is keen to encourage the parties to agree consistent information for those documents, particularly given the challenges arising from the Sargeant remedy and second special members options exercise (Matthews).
- Co-operating with the Money and Pensions Service (MaPS). More information on this can be found from [Pensions dashboards: initial guidance](#)

Other News and Updates

Public sector unions granted judicial review over McCloud cost remedy

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

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

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

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

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

The Pensions Regulator (TPR) enforcement and prosecution policies updated

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

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

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

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

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

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

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

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

The Pensions Regulator (TPR) speech at PLSA conference

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

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

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

Pension Dashboards - Draft guidance on deferring staging date published

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

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

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

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

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

[Click here to return to Contents](#)

Pension Dashboards - Progress update report

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

The report covers:

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

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

Pension Dashboards - Videos published

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

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

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

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

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

The response confirms that the DWP will:

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

Research on public value of dashboards published

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

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

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

Update on connecting early participants to the dashboard ecosystem

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

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

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

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

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

September 2022 CPI rate announced

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

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

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

HMRC

Pension Schemes newsletter 143

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

The newsletter includes articles:

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

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

Message from HMRC on the 2021/22 event reporting mechanism

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

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

The data required for each member is as follows:

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

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

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

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

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

Lifetime Allowance

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

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

Events

FPS coffee mornings

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

[Click here to return to Contents](#)

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

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

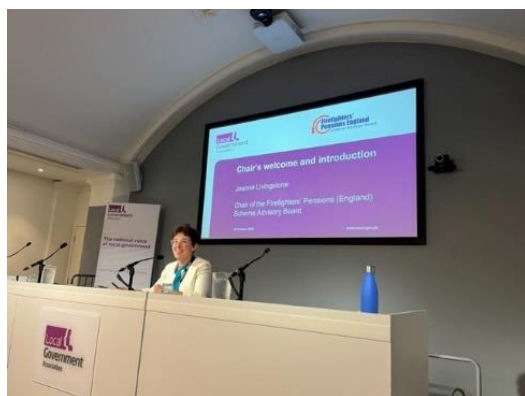
[11 October 2022 – General update on Matthews and 2015 remedy project management](#)

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

FPS AGM - Event summary

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

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



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

[Click here to return to Contents](#)

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

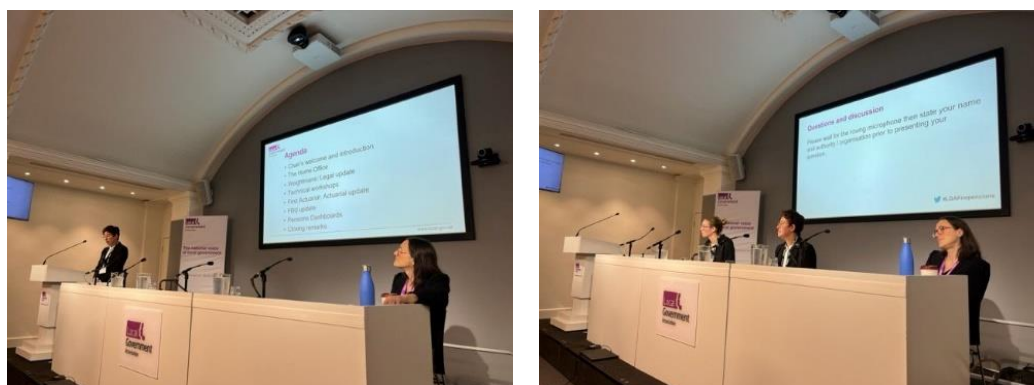


We ended the day with a networking drinks reception with lots of animated conversation between colleagues and friends.

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

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

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



[Click here to return to Contents](#)

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



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

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

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



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



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

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

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

[Click here to return to Contents](#)

Legislation

Statutory Instruments

SI	Reference title
----	-----------------

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

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

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

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

Useful links

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

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[Click here to return to Contents](#)

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

FPS Bulletin 63 – November 2022

Welcome to issue 63 of the Firefighters' Pensions Schemes bulletin.

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

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

Contents

Calendar of events	3
Actions arising	3
FPS	4
Age discrimination remedy – Ill-health factsheet on reassessment of cases	4
Pension Scheme Transitional Protections: Injury to Feelings employment tribunal hearing 14-28 October – hearing vacated	4
Technical query log	5
FPS England SAB updates	6
SAB levy 2022-23 – Request for Purchase Order numbers	6
SAB remedy engagement sessions	6
Other News and Updates	7
PDP publishes updated standards	7
PDP Webinars	7
TPO – Factsheets	8
TPR consultation on dashboard enforcement	8
Regulators issue scam warning to pension schemes and savers	10
TPR blogs	10
GAD blog on Public Service Pension Schemes	10
Autumn Statement 2022	11
New ministerial appointments	12

HMRC	12
HMRC publishes newsletter 144	12
Public service pensions remedy newsletter	13
Consultation on the Public Services Pension Scheme (rectification of unlawful discrimination) (Tax) regulations 2023	13
Events	14
FPS coffee mornings	14
Legislation	14
Statutory Instruments	14
Useful links	15
Contact details	15
Copyright	16
Disclaimer	16

Calendar of events

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

Table 1: Calendar of events

Event	Date
FPS coffee morning	6 and 13 December 2022
Eastern regional group	5 December 2022
SAB	8 December 2022
FPS Communications Working Group	12 December 2022
North West regional group	14 December 2022

Actions arising

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

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

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

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

[Click here to return to Contents](#)

FPS

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

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

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

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

Additionally, the factsheet encourages scheme managers to take immediate steps to review the cohort of membership which will require a re-assessment. This is to ensure that, come 1 October 2023, these cases can be dealt with as soon as possible. Full details of what action is needed has been set out in the factsheet. Sample member communications will be provided later.

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

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

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

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

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

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

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

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

Technical query log

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

Queries regarding the following have been added:

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

FPS England SAB updates

SAB levy 2022-23 – Request for Purchase Order numbers

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

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

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

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

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

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

SAB remedy engagement sessions

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

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

[Click here to return to Contents](#)

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

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

Other News and Updates

PDP publishes updated standards

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

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

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

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

PDP Webinars

PDP will host the following webinars in December 2022:

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

[Click here to return to Contents](#)

- 8 December 2022 – Dashboards standards: design standards consultation

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

TPO – Factsheets

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

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

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

TPR consultation on dashboard enforcement

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

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

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

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

[Click here to return to Contents](#)

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

TPR expects schemes to:

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

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

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

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

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

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

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

Regulators issue scam warning to pension schemes and savers

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

The warning urges savers to:

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

TPR blogs

TPR published two blogs in November 2022:

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

GAD blog on Public Service Pension Schemes

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

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

[Click here to return to Contents](#)

- the complexity of administration provider or administration system procurement

Autumn Statement 2022

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

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

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

New ministerial appointments

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

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

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

HMRC

HMRC publishes newsletter 144

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

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

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

Public service pensions remedy newsletter

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

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

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

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

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

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

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

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

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

[Click here to return to Contents](#)

Events

FPS coffee mornings

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

The next session is due to take place on Tuesday 6 December at 10:00.

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

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

[22 November 2022 – Discretions workshop](#)

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

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

Legislation

Statutory Instruments

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

[Click here to return to Contents](#)

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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[Click here to return to Contents](#)

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

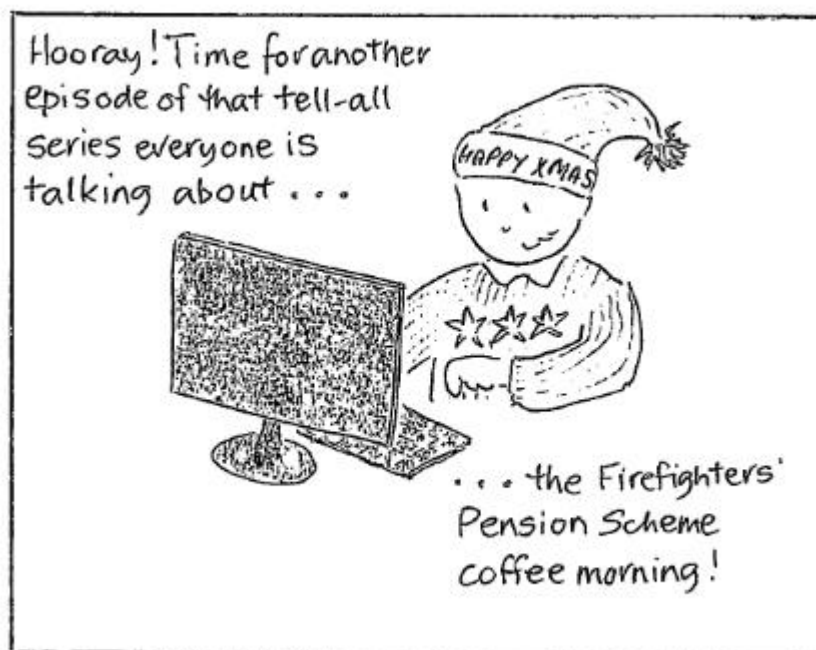
FPS Bulletin 64 – December 2022

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

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

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

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



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

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

Contents

Calendar of events	3
Actions arising	3
FPS	4
IQMP central list	4
New address for Health Partners (Board of Medical Referees)	4
New webpage created – Retrospective remedy	5
Consolidated Regulation 65	5
Retained firefighter Employment Tribunal pension claims	6
Technical query log	6
FPS England SAB updates	7
Festive message from the Chair of the SAB	7
SAB remedy engagement sessions	8
Other News and Updates	9
HM Treasury publishes remedy Directions	9
PDP approach to governance of standards	11
Consultation on regulatory framework for dashboard operators	11
Deferred connection guidance published	11
Early connection guidance updated	12
PDP December newsletter	12
Deputy Pensions Ombudsman	12
TPR's joint regulatory strategy update	13
HMRC	13
HMRC publishes pension schemes newsletter 145	13
Events	14
FPS coffee mornings	14
Legislation	15
Statutory Instruments	15
Useful links	15
Contact details	16
Copyright	16
Disclaimer	16

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	5 and 19 January 2023
SAB	23 January 2023
FPS Communications Working Group	14 March 2023

Actions arising

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

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

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

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

FPS

IQMP central list

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

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

New address for Health Partners (Board of Medical Referees)

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

Health Partners Group Ltd

The Roller Mill

Mill Lane

Uckfield

East Sussex

TN22 5AA

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

New webpage created – Retrospective remedy

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

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

Consolidated Regulation 65

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

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

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

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

Retained firefighter Employment Tribunal pension claims

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

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

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

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

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

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

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

Technical query log

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

There have been no further queries added this month.

[Click here to return to Contents](#)

FPS England SAB updates

Festive message from the Chair of the SAB

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

“Dear Friends & colleagues,

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

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

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

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

[Click here to return to Contents](#)

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

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

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

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

SAB remedy engagement sessions

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

[Click here to return to Contents](#)

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

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

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

Other News and Updates

HM Treasury publishes remedy Directions

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

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

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

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

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

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

PDP approach to governance of standards

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

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

Consultation on regulatory framework for dashboard operators

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

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

The consultation closes on 16 February 2023.

Deferred connection guidance published

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

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

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

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

Early connection guidance updated

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

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

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

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

PDP December newsletter

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

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

Deputy Pensions Ombudsman

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

This is an interim appointment for up to 12 months.

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

[Click here to return to Contents](#)

TPR's joint regulatory strategy update

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

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

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

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

HMRC

HMRC publishes pension schemes newsletter 145

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

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

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

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

Events

FPS coffee mornings

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

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

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

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

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

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

[Click here to return to Contents](#)

Legislation

Statutory Instruments

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

Useful links

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

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[Click here to return to Contents](#)

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