

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.go.uk Tel. Direct: (01482) 393205 Date: 21 January 2022
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Dear Member

I hereby give notice that a meeting of the **PENSION BOARD** of the Humberside Fire Authority will be held on **MONDAY 31 JANUARY 2022 at 10.30AM** at HUMBERSIDE FIRE & RESCUE SERVICE HEADQUARTERS, SUMMERGROVES WAY, KINGSTON UPON HULL, HU4 7BB.

Public and press attendance at meetings

Seating in the public gallery is limited, therefore **places must be booked in advance** by contacting the Committee Manager on the contact details above.

The business to be transacted is set out below.

Yours sincerely



Mathew Buckley
Monitoring Officer & Secretary to 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 12 July 2021	(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

Business	Page Number	Lead	Primary Action Requested
6. Workstreams Update	(pages 3 - 73)	Executive Director of Corporate Services/ S.151 Officer	To receive
7. Remedy Self-Assessment Report	(pages 74 - 135)	Finance Officer	To receive
8. Sargeant/McCloud Update	Verbal	Procurement Manager	To receive
9. Any other business	-	All Members	To raise

PENSION BOARD

AGM

12 JULY 2021

PRESENT:

Employer representatives: Councillor Shepherd and Mr P McCourt (Director of Service Delivery)

Scheme Member representatives: Mr B Johnson (Chairperson) and Mr G Marshall

Councillor Briggs attended an observer.

Martyn Ransom - Head of Finance, David Lofthouse - Procurement Manager, Sarah Keyes - Finance Officer, Mathew Buckley - 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 10.00 a.m.

The Monitoring Officer/Secretary took the chair for Minute 13/21.

13/21 ELECTION OF THE CHAIRPERSON OF THE COMMITTEE - *Resolved* - That Mr B Johnson be appointed Chairperson of the Pension Board until its Annual General Meeting in 2022.

Mr B Johnson took the chair.

14/21 APOLOGIES FOR ABSENCE - There were no apologies for absence.

15/21 DECLARATIONS OF INTEREST - There were no declarations of interest.

16/21 MINUTES - *Resolved* - That the minutes of the meeting of the Board held on 1 February 2021 be confirmed as a correct record.

17/21 MATTERS ARISING FROM THE MINUTES - There were no matters arising from the minutes.

18/21 CALENDAR OF BOARD MEETINGS - The Monitoring Officer/Secretary submitted a report summarising the calendar of Fire Authority meetings.

Resolved - That the report be received.

19/21 PENSION FUND ACCOUNT - The Head of Finance submitted the Pension Fund Account for 2020/21.

The Pension Fund Account continued to be stable, with deficits met annually by the Home Office.

Resolved - That the Pension Fund Account be received.

20/21 REPORTING BREACHES - The Procurement Manager informed the Board that there had been no breaches since the meeting held on 1 February 2021.

Resolved - That the update be received.

21/21 PENSION BOARD WORKSTREAMS UPDATE - The Head of Finance submitted a report setting out an update on the Board's workstreams for 2021/22.

The number of complaints received by the Service each year in relation to pensions tended to be low (often zero), with none received during 2021/22 to date. The Risk Register had been enclosed with the agenda (Appendix 2). The security of scheme members' data remained a key risk, as well as the reliance on a small number of key officers. However, the continued support of West Yorkshire Pension Fund addressed the risks concerning data and reliance on officers. The Service was also due to recruit two new members of staff to assist in addressing the outcomes of the Sargeant/McCloud case (Minute 8/21 refers).

The Service was reviewing one of the key performance indicators (KPIs) used to hold West Yorkshire Pension Fund to account for its performance in relation to the speed with which death-in-retirement processes were undertaken.

Resolved - That the report be received.

22/21 FPS MEMBER WEBSITE - The Finance Officer provided the Board with details of the new website designed for members of the Firefighters' Pension Scheme.

Resolved - That the details be received.

23/21 SARGEANT/MCCLOUD UPDATE - The Head of Finance gave a verbal update to the Board on the Sargeant/McCloud case.

At its meeting of 25 June 2021, the Fire Authority had received a report (Minute 95/21 refers) on the informal Home Office guidance on the Treatment of 'Immediate Detriment' cases issued on 21 August 2020 and updated on 10 June 2021 ("the Immediate Detriment Guidance") in relation to members of the Firefighters' Pension Scheme 1992 and the New Firefighters' Pension Scheme 2006 ("the Legacy Schemes"). The Authority had agreed the report with the following conditions:

- (1) A Framework for the application of the Immediate Detriment Guidance is nationally agreed between the Government, Fire and Rescue Authorities and the Representative Bodies.
- (2) Where calculation of benefits under Immediate Detriment Guidance in accordance with the nationally agreed Framework is possible.

A Member queried why the Authority had not opted to proceed with the application of the remedy using the informal Home Office guidance. While six Scheme members had been identified as prospective 'Immediate Detriment' cases up to 31 March 2022, the informal guidance had no basis in law, and the Authority expected the national framework on the application of Immediate Detriment Guidance to be agreed by all parties by September 2021. Processing cases before this would pose a risk to both the Authority and FFPS Members.

However, the Board resolved to recommend that the Fire Authority reconsider its decision with regard to the application of the updated Immediate Detriment Guidance and was keen to ensure that the Service was doing all it could to support the welfare of affected Scheme members before the national framework was agreed.

Resolved - (a) That the update be received;

Recommended -

(b) that the Authority offer welfare support to Scheme members affected ahead of the agreement of a national framework for the application of the Sargeant/McCloud remedy, and

(c) that the Authority reconsider its decision with regard to the implementation of the Home Office's updated Immediate Detriment Guidance.

24/21 ANY OTHER BUSINESS – There were no items.

Pension Board
31 January 2022

Report by the Executive Director of
Corporate Services/S.151 Officer

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, 2017/18. There was one complaint in 2018/19 and one in 2019/20 which have now been concluded. There were three complaints in 2020/21, one has been concluded and two are being investigated under the complaints procedure. There have been no complaints in 2021/22 to date.

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), over reliance on key pensions administration officers (Risk 6), and also legislative change (Risk 7).

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 risks are the late payment of benefits (Risk 10) and cyber security breaches due to increased remote working (Risk 12).

These risks reflect the different working practices that have had to be adopted to ensure the ongoing administration of the scheme during the current 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 2 and quarter 3 of 2021/22.

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 including those currently contributing to the 1992, 2006 and 2015 schemes and those in receipt of a pension. This information will be brought to each Board meeting.

- **Communication**

C5 workstream – Communication by the Scheme Advisory Board

The most recent Scheme Advisory Board Bulletins are attached at **Appendix 5**.

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.

K WILSON

Officer Contact: Kevin Wilson ☎ 01482 567183
Executive Director of Corporate Services/S.151 Officer

Humberside Fire & Rescue Service
Summergroves Way
Kingston upon Hull

KW/SK
18/01/2022

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 July 2020 February 2021 and July 2021	Jan 2022	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 in 2018/19, one in 2019/20, and three in 2020/21 to date.	June 2016 January and July 2017 January and July 2018 January and July 2019 January July 2020 February 2021 and July 2021	Jan 2022	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 2019 and July 2019 January July 2020 February 2021 and July 2021	Jan 2022	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 2019 and July 2019 January July 2020 February 2021 and July 2021	Jan 2022	Each Pension Board

	Workstream	Progress	Report to Pension Board		
			Previous	Today	Future
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 2019 and July 2019 January July 2020 February 2021 and July 2021	Jan 2022	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
COMMUNICATION					
C1	By Scheme	Latest publication presented to meetings	January 2016, January and July 2017 July 2018 July 2019 July 2020 July 2021	-	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	Jan 2022	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
		Likelihood	Impact	Risk Rating					
	Risk Area 1 - Operations								
1	Operational disaster (fire, flood etc)	1	4	4	Business continuity plans in place for Pension Administrator	Senior Finance Officer	Annual	Jul-22	
					Business continuity plans in place for Scheme Manager	Senior Finance Officer	Annual	Jul-22	
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-22	Less likely that data will be incomplete or inaccurate now that monthly returns are being submitted
					Returns from annual statements, Life Certificate checks, and National Fraud Initiative checks	Pension Admin	Annual	Jul-22	
3	Administration process failure/maladministration	1	2	2	Formal agreement in place with administrator, including SLAs	Senior Finance Officer	Annual	Jul-22	KPIs subject to quarterly review
					Authority levels clearly agreed and kept up to date	Scheme Manager	Annual	Jul-22	
					Review independent reports of administrator's process	Scheme Manager	Annual	Jul-22	
					Ongoing dialogue with administrator	Senior Finance Officer	Ongoing	Ongoing	
					Contract meetings between Pension Administrator and Senior Finance Officer	Senior Finance Officer	Quarterly	Ongoing	

	Risk Area 2 - Financial								
4	Excessive charges by supplier	3	2	6	Annual review of scheme budget, review of costs incurred against budget	Senior Finance Officer	Annual	Jul-22	Charges may increase with additional work required as a result of McCloud/Matthews judgments
					Periodic review of supplier	Senior Finance Officer	Annual	Jul-22	
5	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-22	
					Monitoring of contribution payments	Senior Finance Officer	Monthly	Jul-22	
					Annual audit	Finance Manager	Annual	Jul-22	
	Risk Area 3 - Regulatory & Compliance								
6	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	
7	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 The Pensions Regulator's educational material	Scheme manager	Ongoing	Ongoing	
					Technical advice and updates	Scheme manager	Ongoing	Ongoing	
8	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	Procedures put in place to automate production of ABS for Special Modified Scheme Members
9	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								
10	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 testing	Scheme Manager	Ongoing	Ongoing	
11	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
12	Cyber security breaches due to increased remote working	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	
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
					Administrators performing key duties remotely				

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

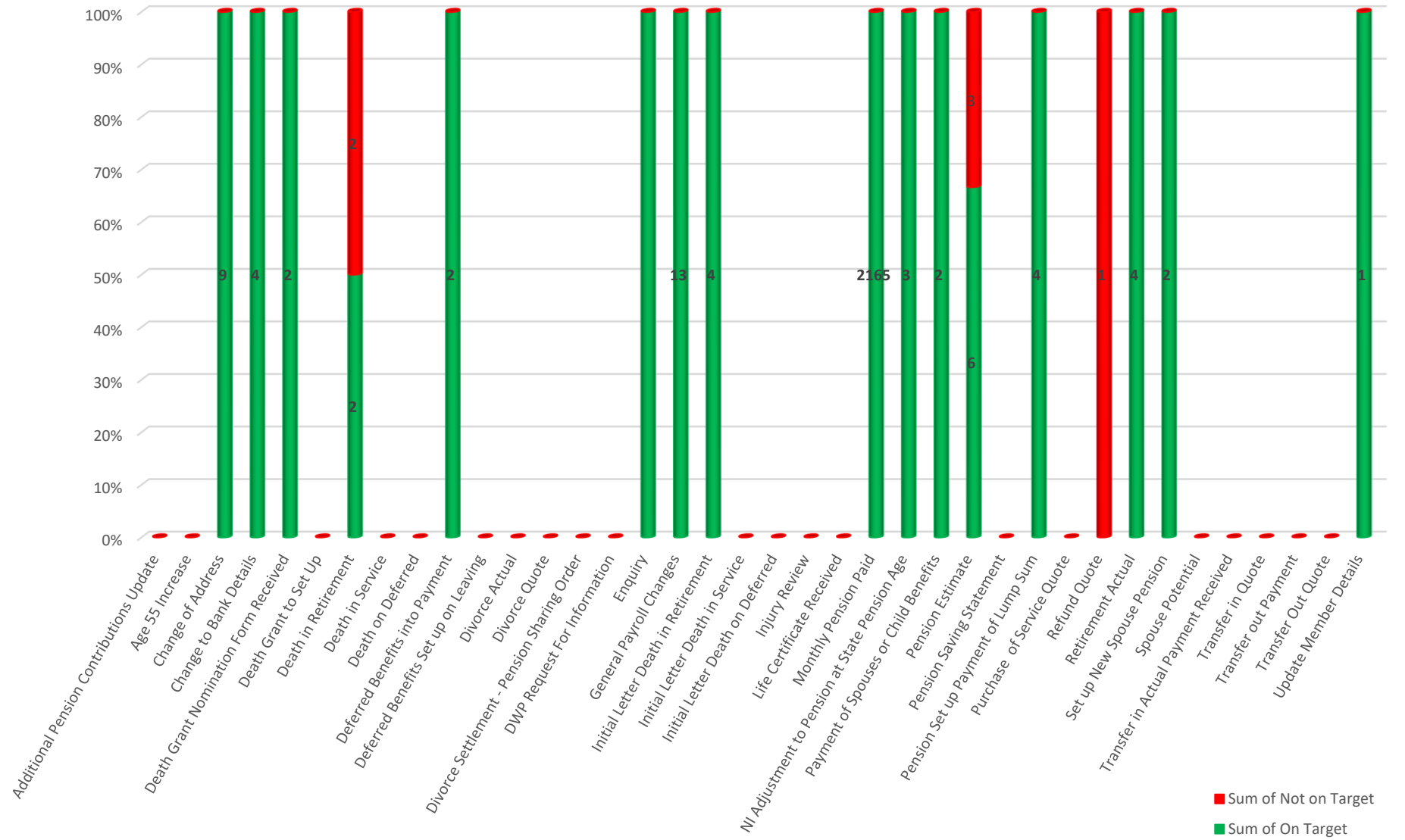
	Likelihood Score				
Impact Score	1	2	3	4	5
5 Catastrophic	5	10	15	20	25
4 Major	4	8	12	16	20
3 Moderate	3	6	9	12	15
2 Minor	2	4	6	8	10
1 Negligible	1	2	3	4	5

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

KPIs 2021/22 Quarter 2

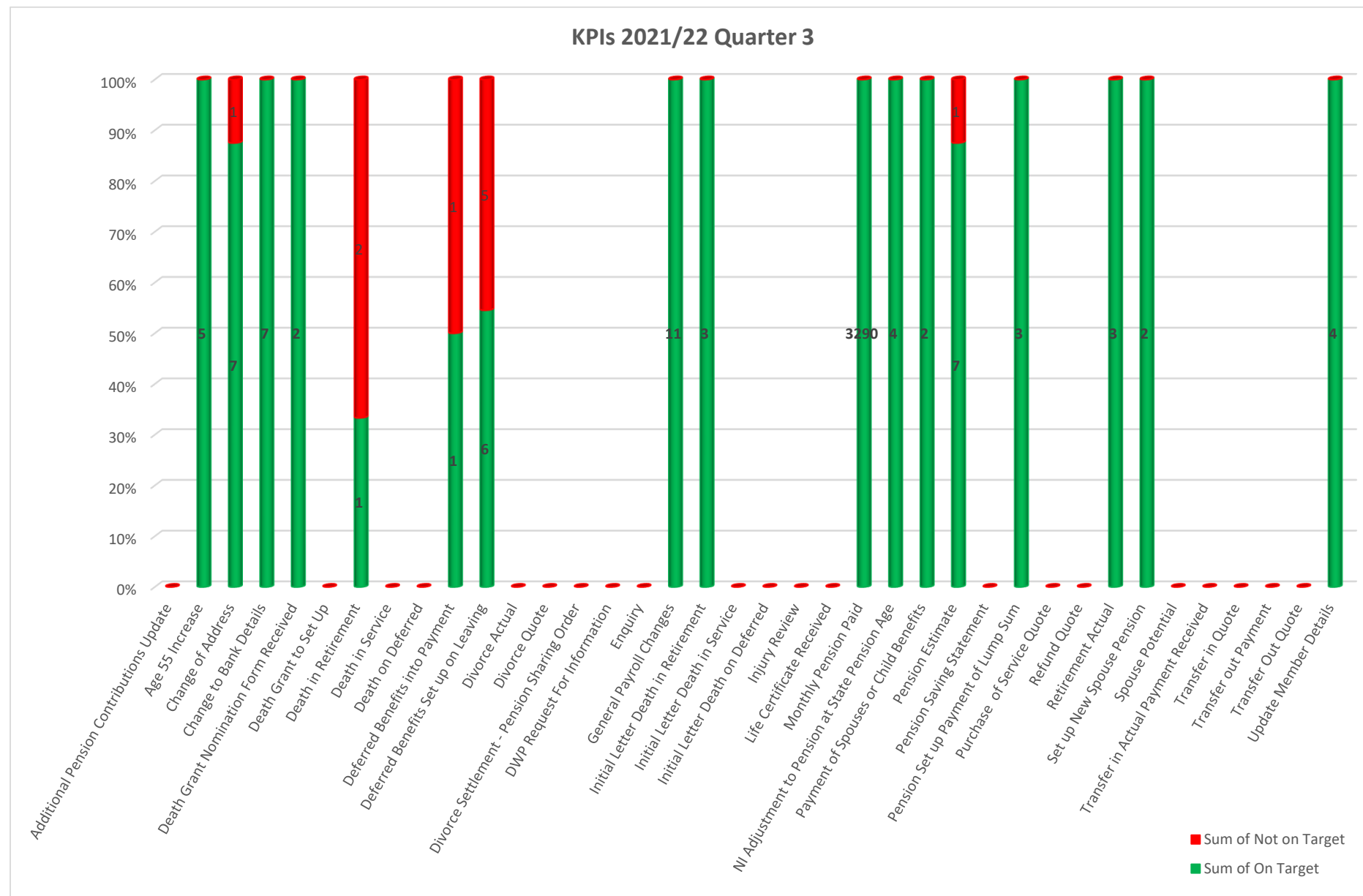
Number	Key Performance Indicator	Target Days	Minimum
1	Additional Pension Contributions Update	10	85%
2	Age 55 Increase	20	85%
3	Change of Address	20	85%
4	Change to Bank Details	20	85%
5	Death Grant Nomination Form Received	20	85%
6	Death Grant to Set Up	5	85%
7	Death in Retirement	5	85%
8	Death in Service	5	85%
9	Death on Deferred	5	85%
10	Deferred Benefits into Payment	3	85%
11	Deferred Benefits Set up on Leaving	10	85%
12	Divorce Actual	80	100%
13	Divorce Quote	35	85%
14	Divorce Settlement - Pension Sharing Order	80	100%
15	DWP Request For Information	10	85%
16	Enquiry	5	85%
17	General Payroll Changes	20	85%
18	Initial Letter Death in Retirement	5	85%
19	Initial Letter Death in Service	5	85%
20	Initial Letter Death on Deferred	5	85%
21	Injury Review	20	100%
22	Life Certificate Received	5	85%
23	Monthly Pension Paid	Due Date	100%
24	NI Adjustment to Pension at State Pension Age	20	85%
25	Payment of Spouses or Child Benefits	5	85%
26	Pension Estimate	10	85%
27	Pension Saving Statement	20	100%
28	Pension Set up Payment of Lump Sum	3	85%
29	Purchase of Service Quote	20	85%
30	Refund Quote	35	85%
31	Retirement Actual	10	85%
32	Set up New Spouse Pension	5	85%
33	Spouse Potential	10	85%
34	Transfer in Actual Payment Received	10	85%
35	Transfer in Quote	10	85%
36	Transfer out Payment	10	85%
37	Transfer Out Quote	35	100%
38	Update Member Details	20	100%

KPIs 2021/22 Quarter 2



KPIs 2021/22 Quarter 3

Number	Key Performance Indicator	Target Days	Minimum
1	Additional Pension Contributions Update	10	85%
2	Age 55 Increase	20	85%
3	Change of Address	20	85%
4	Change to Bank Details	20	85%
5	Death Grant Nomination Form Received	20	85%
6	Death Grant to Set Up	5	85%
7	Death in Retirement	5	85%
8	Death in Service	5	85%
9	Death on Deferred	5	85%
10	Deferred Benefits into Payment	3	85%
11	Deferred Benefits Set up on Leaving	10	85%
12	Divorce Actual	80	100%
13	Divorce Quote	35	85%
14	Divorce Settlement - Pension Sharing Order	80	100%
15	DWP Request For Information	10	85%
16	Enquiry	5	85%
17	General Payroll Changes	20	85%
18	Initial Letter Death in Retirement	5	85%
19	Initial Letter Death in Service	5	85%
20	Initial Letter Death on Deferred	5	85%
21	Injury Review	20	100%
22	Life Certificate Received	5	85%
23	Monthly Pension Paid	Due Date	100%
24	NI Adjustment to Pension at State Pension Age	20	85%
25	Payment of Spouses or Child Benefits	5	85%
26	Pension Estimate	10	85%
27	Pension Saving Statement	20	100%
28	Pension Set up Payment of Lump Sum	3	85%
29	Purchase of Service Quote	20	85%
30	Refund Quote	35	85%
31	Retirement Actual	10	85%
32	Set up New Spouse Pension	5	85%
33	Spouse Potential	10	85%
34	Transfer in Actual Payment Received	10	85%
35	Transfer in Quote	10	85%
36	Transfer out Payment	10	85%
37	Transfer Out Quote	35	100%
38	Update Member Details	20	100%



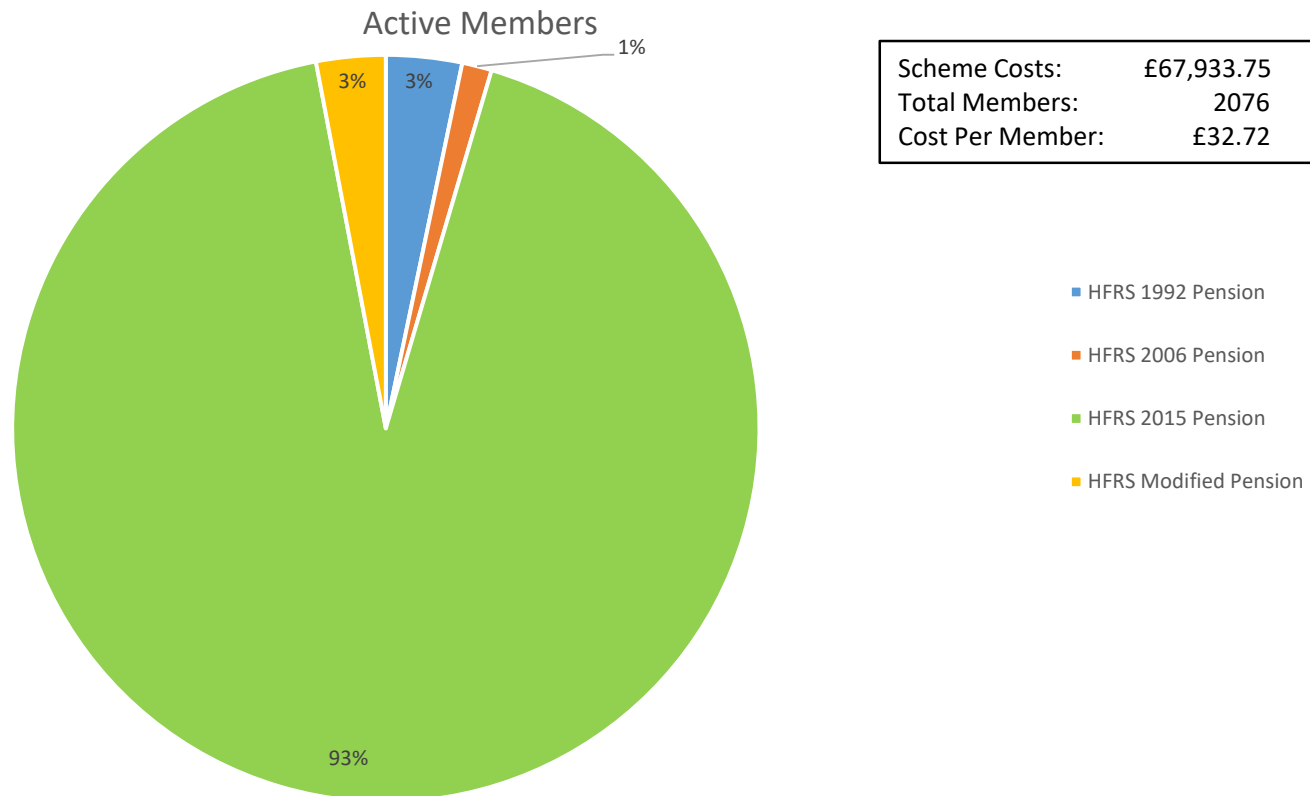
Firefighters' Pension Scheme - Number of Scheme Members and Administration Cost Per Member as at 31/12/2021

Total Members

Scheme Name	Active	Deferred	Pensioner	Beneficiary
HFRS 1992 Pension	23	42	832	155
HFRS 2006 Pension	9	111	11	2
HFRS 2015 Pension	641	136	8	0
HFRS Modified Pension	21	7	74	4
Total	694	296	925	161
Grand Total	2076			

Total Costs

Service	Cost
HFRS Salary	£34,448.85
Administration	£28,429.00
Payroll	£5,055.90
Total	£67,933.75





FPS Bulletin 47 – July 2021

Welcome to issue 47 of the Firefighters' Pensions Schemes bulletin. We hope that readers remain safe and well.

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 or suggested items for future issues, please email claire.hey@local.gov.uk.

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Calendar of events

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

Table 1: Calendar of events

Event	Date
North East regional group	18 August 2021
FPS coffee and catch up	Next scheduled event 24 August 2021
Eastern regional group	7 September 2021
SAB	9 September 2021
Eversheds Sutherland cyber and data breach training	20 September 2021
SAB	9 December 2021

FPS

PSP&JO Bill introduced

On 19 July 2021, HM Treasury (HMT) introduced the Public Service Pensions & Judicial Offices Bill (PSP&JO Bill) to the House of Lords.

The following documents are available from the [PSP&JO Bill publications page](#) and updated versions will be added as the Bill progresses through Parliament:

- Bill (as introduced)
- Explanatory Notes
- Delegated Powers Memorandum
- Equality Impact Assessment
- Impact Assessment
- Two documents on the Bill's first reading

The PSP&JO Bill sets out in law how the Government will remove the discrimination identified by the courts in the way that the 2015 reforms were introduced for some members (i.e., remedy).

This is the primary legislation which closes final salary schemes for accrual past 31 March 2022 and moves all remaining members into FPS 2015, while ensuring that existing transitional protections such as the final salary link and double accrual are retained.

[Click here to return to Contents](#)

More information about how benefits are calculated for transitional members of the FPS 2015 is available from the [FPS 2015 transition members](http://www.fpsmember.org) page of www.fpsmember.org, including details of how final salary accrual in the FPS 1992 is treated under the [double accrual protection](#).

HMT has provided a [central Q&A document](#) and we are expecting a version that is more tailored to the FPS in due course.

Details of the Bill have been published on www.fpsmember.org under [Age Discrimination Remedy](#) and we will be working with the Fire Communications Working Group on developing central communications for scheme members.

The second reading of the Bill is due to take place in the House of Lords on 7 September 2021.

Knowledge Hub technical forum reinstated

Readers may remember that before the introduction of www.fpsregs.org, all resources and technical advice were provided through a Knowledge Hub forum.

While we have moved away from this platform in order to provide central and consistent access to resources and formal technical guidance, the forum has been reinstated for members to share technical knowledge and best practice, in order to promote peer working and collaboration within the sector.

Forum members can raise technical queries and share experiences with colleagues; however, users must note that any information provided is on an informal basis and should not be treated as legal advice. If a query needs to be escalated, it should be logged using the existing [technical query form](#).

The forum is restricted to administrators and employer representatives of the FPS and can be accessed using the following link:

<https://khub.net/group/thefirefighterspensionsdiscussionforum/group-forum>

You will need to register and request to join if you are not already a member.

Readers should also note that the Firefighters' Pensions practitioners' group on Workplace will shortly be closed down as it is not being used.

Technical query log

The current [log of queries and responses](#) is available on the FPS Regulations and Guidance website. The queries have been anonymised and divided into topics. The log will be updated monthly in line with the bulletin release dates.

No new queries have been added this month.

Please bear with us if you experience a delay in response to your technical query. As you can imagine, much of our resource is currently focused on remedy-related issues.

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FPS England SAB updates

TPR 2020-21 Governance and Administration survey

On 1 July 2021, the Pensions Regulator (TPR) published the results of its [2020-21 Governance and Administration survey](#).

The survey was conducted online between January and March 2021 and aims to track governance and administration practices among public service pension schemes. The 2020-21 survey also included new questions on response to the pandemic and pensions dashboards.

TPR measures annual progress against the following six key processes:

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

Three quarters (74 per cent) of Firefighters' schemes who responded to the survey had all six processes in place. This is a significant increase from 55 per cent in 2019.

The report is being considered by the Local Pension Board (LPB) effectiveness committee ("the Committee") to make recommendations to the Scheme Advisory Board (SAB) on any actions needed.

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

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

Template FPS Administration Strategy published

In [FPS Bulletin 34 – June 2020](#) we launched a consultation on a template pension administration strategy for the FPS, which was developed following a recommendation in [AON's 2019 review](#) of the administration and management of the scheme.

The initial consultation response was published with [FPS Bulletin 37 – September 2020](#).

All feedback has now been considered and we are pleased to include tracked versions of the [updated consultation response](#) and the [revised template strategy](#) as appendices to the bulletin. The final strategy is available from the [guides and sample documents page](#) of www.fpsregs.org as a Word document for FRAs to download and adapt to suit their individual requirements.

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TPR reported in section 4.3 of the latest [governance and administration survey results](#) that just under half of Firefighters' schemes had an administration strategy, compared to almost three-quarters of schemes across the public sector. We hope that publication of the template will help schemes to put an administration strategy in place and increase this outcome for the 2021-22 survey.

SAB response to pensions dashboards staging call for input

We confirmed in [FPS Bulletin 46 – June 2021](#) that the SAB would respond to the Pensions Dashboards Programme (PDP) call for input on dashboard staging, which proposed that public service schemes join the dashboard within a two-year period starting from April 2023.

In summary, the [Board's response to the call for input](#) was that staging for the Firefighters' Pension Scheme should be only after the age discrimination remedy has been implemented and the first set of annual benefit statements issued successfully in Autumn 2024.

Other News and Updates

Clair Alcock leaves the team



Many of our readers will be aware that Clair will shortly be leaving the LGA to take up a new role as Head of Police Pensions with the National Police Chiefs' Council (NPCC). Clair's last day is 3 September 2021.

Clair is a familiar face to many and has worked for the LGA in the pensions team since December 2014, leading and advising stakeholders in the management, governance, and administration of the Firefighters' Pension Schemes.

Clair works closely with all stakeholders across the Fire sector and has had a significant impact on improving the understanding of the pension schemes and its effect on the workforce and employer.

Before joining the LGA, Clair was the lead consultant for software development on Police and Fire Pensions having previously worked with both private and public sector pension schemes.

Clair will be sorely missed by all colleagues at the LGA and across the Fire sector. Congratulations on your new role Clair, and good luck!

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HMT response to consultation on implementation of increased NMPA

We confirmed in [FPS Bulletin 42 – February 2021](#) that HMT was consulting on the implementation of an increased normal minimum pension age (NMPA) from age 55 to age 57 on 6 April 2028.

NMPA is the minimum age at which most pension savers can access their pensions without incurring an unauthorised payments tax charge (unless they are taking their pension due to ill-health).

On 20 July 2021, HMT published its [response to the NMPA consultation](#) in addition to a [policy paper and draft regulations introducing measures to increase the NMPA](#).

The measures will not affect members who:

- are retiring due to ill health
- have a protected pension age
- are members of the firefighters, police, and armed forces public service schemes.

MHCLG consultation on special severance payments

The Ministry of Housing Communities and Local Government (MHCLG) has published a consultation on New Best Value statutory guidance covering special severance payments for local authorities in England. You can find the draft statutory guidance and covering letter from MHCLG on the [scheme consultations](#) page of www.lgpsregs.org.

Our colleagues on the Local Government Pension Scheme (LGPS) team also have published [LGA's initial comments](#) on this page.

MHCLG welcomes responses from all interested parties. They are particularly keen to receive responses from the bodies listed in the Annex to the covering letter. This list covers public sector scheme employers, including Fire and Rescue Authorities and the London Fire Commissioner.

TPO's term of office extended

The DWP has confirmed that it has extended the term of Anthony Arter as The Pensions Ombudsman (TPO) for another year.

In a [letter to Work and Pensions Committee Chair Stephen Timms](#), Minister for Pensions and Financial Inclusion, Guy Opperman stated that Mr Arter's term will be extended for a period of 12 months from 1 August 2021.

Stronger nudge to pensions guidance consultation

On 9 July 2021, [DWP launched a consultation on draft regulations](#) that will require occupational pension schemes, in most situations, to nudge members aged 50 or above applying to access, or to transfer out for the purposes of accessing, their benefits.

The regulations will require pension schemes to explain the nature and purpose of

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Pension Wise guidance and facilitate the booking of a Pension Wise appointment as part of the application process. The regulations will also require the member to have confirmed that they have received the guidance or opted out of receiving it before the scheme can action the application.

The regulations will implement the duty set out in section 19 of [the Financial Guidance and Claims Act 2018](#).

The consultation applies to England, Wales, and Scotland. It is anticipated that Northern Ireland will make corresponding regulations. The consultation closes on 3 September 2021.

Actuarial, Benefits and Governance Consultancy Services Framework

On 1 July 2021, the National LGPS Frameworks launched the [Actuarial, Benefits and Governance Consultancy Services Framework 2021](#).

The [framework joining instructions](#) confirm that scheme managers of public sector pension schemes can use the consultancy services framework.

If you would like more information or copies of the supporting documentation (including provider catalogues and guidance notes) or you have a query about this or any other framework, please email: NationalLGPSframeworks@norfolk.gov.uk.

HMRC

HMRC newsletters/bulletins

On 30 July 2021, HMRC published [Pension schemes newsletter 131](#) containing important updates and guidance for schemes. Articles include:

- relief at source – annual return of information for the tax year 2020 to 2021
- relief at source and National Insurance applications
- Managing pension schemes service:
 - Retirement annuity contracts and deferred annuity contracts
 - amending an Accounting for Tax return
- Managing pension schemes service – user research
- annual allowance - pension savings statements for tax year 2020 to 2021
- annual allowance - declaring the annual allowance charge on the Self Assessment tax return
- non-taxable payments following a member's death and Real Time Information (RTI) reporting
- pension flexibility statistics
- qualifying recognised overseas pension schemes transfer statistics

Contracting-out reconciliation update

On 26 July 2021, HMRC published [Countdown Bulletin 55](#) with updates on:

- the closure of Scheme Cessation and Scheme Reconciliation eRooms
- final data cuts for Pension Schemes
- how to raise queries with HMRC

Pension Scheme Pays reporting: information and notice deadlines

On 20 July 2021, [HMRC published a policy paper](#) and [draft regulations proposing to extend the mandatory scheme pays deadline](#) for members whose pension input amount is retrospectively changed.

The proposal has been made because of the age discrimination remedy, where a member's annual allowance position for a previous tax year may be changed retrospectively. However, HMRC has confirmed that the proposal will not be restricted to just these cases.

The proposal will extend the scheme pays deadline where –

- the administrator gives information to the member about a change to the pension input amount on or after 2 May in the year following that in which the relevant tax year ends and before the end of the six-year period beginning with the end of the tax year, and
- as a result of the change, the member qualifies to elect for mandatory scheme pays.

In these cases, it is proposed that the member must give the scheme pays election within three months from being given the information about the change or, if earlier, before the end of the six-year period beginning with the end of the relevant tax year. In other cases, the deadline remains 31 July in the year following that in which the tax year ends.

Consequently, the draft regulations also propose amending the deadline by which the administrator must report and pay the charge to HMRC. It is proposed that administrators will need to report the charge on the Accounting for Tax return for the quarterly period following that in which the administrator receives the scheme pays election (though schemes will continue to be able to include the charge on a return for an earlier period). This proposal will apply to all scheme pays elections (not just those resulting from a retrospective change).

The Government signified its intention to make these changes on Tax Day in March. See [FPS Bulletin 43 – March 2021](#) for more information.

It is intended that the changes will commence on 6 April 2022 with retrospective effect to 6 April 2016.

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Events

FPS coffee mornings

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

We will be taking a short break over the holiday period and will resume the sessions on 24 August 2021.

If you do not already receive the meeting invitations and would like to join us, please email bluelight.pensions@local.gov.uk.

Legislation

SI	Reference title
2021/764	The Financial Guidance and Claims Act 2018 (Commencement No. 8) Regulations 2021

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](#)
- [Welsh Government Fire circulars](#)

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FPS Bulletin 48 – August 2021

Welcome to issue 48 of the Firefighters' Pensions Schemes bulletin. We hope that readers remain safe and well.

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 or suggested items for future issues, please email claire.hey@local.gov.uk.

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Calendar of events

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

Table 1: Calendar of events

Event	Date
FPS coffee and catch up	14 and 28 September 2021
Eastern regional group	7 September 2021
SAB	9 September 2021
Eversheds Sutherland cyber and data breach training	20 September 2021
North East regional group	17 November 2021
SAB	9 December 2021

Actions arising

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

[TPR scheme return](#): Scheme managers to check contact details are correct on the Exchange.

[Managing Pension Schemes \(MPS\) service](#): FRAs to enrol on to the new MPS service, no later than 24 September 2021.

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FPS

PSP&JO Bill Home Office guidance

Home Office guidance has now been published, following the announcement of the introduction of [Public Service Pensions & Judicial Offices \(PSP&JO\) Bill](#) and the accompanying centralised Q & A document in [FPS Bulletin 47 – July 2021](#).

The [PSP&JO Bill Home Office guidance](#) is a more tailored version of the central FAQs for the FPS. It provides a detailed summary of how the Bill legislates to remove the discrimination identified in the McCloud/Sargeant litigation and what it means for affected scheme members.

For reference, it contains information on:

- what the Government has published;
- the background and detail of the Public Service Pensions and Judicial Offices Bill;
- how the Bill will implement changes across all the main public service pension schemes in response to the Court of Appeal judgment in the McCloud and Sargeant cases;
- the next steps following the Bill and any additional information which may be helpful to members.

Please note that the guidance will be kept under review.

LGA update on the PSP&JO Bill

We are pleased to publish an [LGA update on the PSP&JO Bill](#) and what it means for the FPS.

The update comments on the main provisions of the Bill and looks in particular at the effect for transition members.

Technical query log

The current [log of queries and responses](#) is available on the FPS Regulations and Guidance website. The queries have been anonymised and divided into topics. The log will be updated monthly in line with the bulletin release dates.

Queries have been answered this month in the following categories: compensation scheme (page 35).

Please bear with us if you experience a delay in response to your technical query. As you can imagine, much of our resource is currently focused on remedy-related issues.

If you need an informal steer from sector colleagues in the meantime, please use the recently reinstated [Knowledge Hub technical forum](#), as detailed in [FPS Bulletin 47 – July 2021](#).

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FPS England SAB updates

SAB response to HMT consultations

We told readers in [FPS Bulletin 46 – June 2021](#) that HM Treasury (HMT) had published two public consultations seeking views on proposals to reform the cost control mechanism in public service pension schemes, and secondly on the appropriate methodology for setting the discount rate used in scheme valuations.

The Scheme Advisory Board (SAB) submitted responses to both consultations on 19 August, working closely with the [Cost-effectiveness committee](#) and the actuarial advisers to the SAB, First Actuarial.

The responses can be found on the [consultations page](#) of the SAB website.

TPR publishes interim response to code of practice consultation

Between 17 March and 26 May 2021, the Pensions Regulator (TPR) consulted on a proposed new code of practice. The first phase of the new modular code contains 51 topic-based units and replaces 10 of the longer existing codes of practice.

TPR published its [interim response to the code of practice consultation](#) on 24 August 2021. Key points or issues raised were support for setting common expectations of all schemes, the intended audience for modules, use of the new term 'governing body', and the requirement for schemes to undertake an own risk assessment.

TPR is currently reviewing the detailed feedback received and the earliest time that the new code might become effective is summer 2022.

Other News and Updates

Farewell from Clair Alcock

As announced in the last bulletin, I have been offered the post of Head of Police Pensions for NPCC and I will leave LGA on 3 September.

I have been lucky to work in a sector with so many committed stakeholders who have shared my vision in building the delivery of Fire pensions and thank you all for your support and encouragement. It has been an absolute pleasure working with the Fire sector and thank you for the kind words I have already received.

I am delighted to announce that after a successful interview Claire Hey has been offered the post as my successor, and I wish her all the best and know that she will receive wide support from the sector.

Briefing paper on the PSP&JO Bill published

The House of Lords Library published [briefing paper LLN-2021-0019](#) about the PSP&JO Bill on 26 August 2021.

The paper gives an overview of the Bill and a useful explanation of the policy background. The provisions of the Bill are listed by clause with a brief description of what each intends to achieve.

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TPR scheme return

Scheme return notices are being sent to public service pension scheme managers in September.

[Information about completing and submitting a public service scheme return](#) can be found on the TPR website. Schemes are advised to make sure that their contact details are up to date on the [Exchange](#) system.

Completing the scheme return is a legal requirement and scheme managers could be fined for failing to submit a completed return by the deadline.

Guidance on GMPs and new State Pension

On 12 August 2021, the Department for Work and Pensions (DWP) published a factsheet: [Guaranteed Minimum Pension \(GMP\) and the effect of the new State Pension](#). The factsheet is for individuals who have a GMP and reach their State Pension age after 5 April 2016.

Action Fraud webinars

Action Fraud is hosting a series of free webinars on reporting pension scams, supported by TPR, Pension Scams Industry Group (PSIG) and the National Economic Crime Centre (NECC).

View the agenda and register for one of the webinars below:

- [16 September 2021](#)
- [21 October 2021](#)
- [25 November 2021](#)

The webinar will provide clarity on when to report, what to report and who to report to, and will feature expert speakers with a short Q and A session.

HMRC

Managing Pension Schemes (MPS) service

On 16 August 2021, HMRC published [Managing Pension Schemes service newsletter – August 2021](#). The latest newsletter has articles on:

- declaring as pension scheme administrator for a retirement annuity contract and deferred annuity contract
- submitting an Event Report
- migration
- Accounting for Tax (AFT) return
- how you can help us
- signing into online services
- updating your details

HMRC is currently contacting all FRAs by email to help them enrol on the new MPS before migration. Enrolment should ideally take place before 24 September 2021.

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HMRC has emphasised the importance of the FRAs making sure that the correct legal sub-scheme administrator registers on MPS. The legal sub-scheme administrator is the named FRA, not the appointed pension administrator (practitioner). This is important as HMRC may issue tax assessments, penalty notices and Information notices on the sub-scheme administrator. If these are not paid and enforcement action proceeds, this should be on the legal sub-scheme administrator.

The provisions for sub-schemes are set out in [The Registered Pension Schemes \(Splitting of Schemes\) Regulations 2006](#). The core regulations set out the basic rules for splitting a scheme. There are then three schedules:

- schedule 1 sets out the schemes to be split
- schedule 2 sets out the names of the sub-scheme administrators for each split scheme
- schedule 3 sets out those responsibilities and liabilities of a scheme administrator in FA04 and secondary legislation which are to apply instead to a sub-scheme administrator.

If you have any questions about or feedback on the Managing Pension Schemes service, please contact migration.mps@hmrc.gov.uk.

HMRC newsletters/bulletins

On 27 August 2021, HMRC published [Pension schemes newsletter 132](#) containing important updates and guidance for schemes. Articles include:

- Relief at source
 - annual return of information — interim repayments
 - APSS106 annual claims for tax year 2020 to 2021
 - reporting excess relief
- Annual allowance
 - pension savings statements for tax year 2020 to 2021
- Pension scheme migration:
 - viewing pension schemes
 - schemes without Pension Scheme Tax References (PSTRs)
 - wound up pension schemes
 - multiple IDs

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 14 September 2021.

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

Legislation

SI	Reference title
2021/950	<u>The Pension Schemes Act 2021 (Commencement No. 3 and Transitional and Saving Provisions) Regulations 2021</u>

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](#)
- [Welsh Government Fire circulars](#)

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FPS Bulletin 49 – September 2021

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Calendar of events

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Table 1: Calendar of events

Event	Date
FPS coffee morning	12 and 26 October 2021
South West and Wales regional group	5 October 2021
Aon Pensions Dashboards webinar	6 October 2021
Fire Finance Network conference	13-14 October 2021
Midlands regional group	21 October 2021
North East regional group	18 November 2021
SAB	9 December 2021

FPS

Two pension award case study

Certain unique elements of the Firefighters' Pension Schemes continue to cause administrative complexities; entitlement to two pensions being one example that requires good communication and collaboration between an FRA and their administrator.

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One FRA has shared their experiences in this [two pension award case study](#), taking readers on a journey from an initial query, identification and resolution of an issue, breach recording, and review of internal processes.

This detailed case study has been shared as an example of best practice and to raise awareness of two pension entitlements. It is a strong example of partnership working between an FRA, their administrator, and a representative body, and also demonstrates thorough consideration of the Pension Regulator's breach processes.

We welcome case studies on any examples of good practice that FRAs would like to share. Please email bluelight.pensions@local.gov.uk with submissions for future issues.

LGA vacancy - Firefighters' Pensions Adviser - Employers

We are looking for someone to join us at the LGA to provide high-quality support to FRAs and FPS practitioners as a [Firefighters' Pensions Adviser – Employers](#) on a home or office-based contract.

The ideal candidate will have knowledge and experience of the FPS and excellent communication skills to support scheme stakeholders through a number of upcoming legislative developments that will require clear and comprehensive information and will bring with them significant administrative and communication challenges.

The closing date for applications has been extended to 11 October 2021 and interviews will now take place in the week commencing 25 October 2021.

Please contact claire.hey@local.gov.uk with any questions about the role.

Technical query log

The current [log of queries and responses](#) is available on 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: abatement (page 11), deferred benefits (page 58), pension sharing (page 92), and survivors pension (page 105).

Please bear with us if you experience a delay in response to your technical query. As you can imagine, much of our resource is currently focused on remedy-related issues.

FPS England SAB updates

SAB LPB effectiveness committee vacancy

We have a vacancy on the [Local Pension Board \(LPB\) effectiveness committee](#) for an FRA LPB representative. The LPB effectiveness committee considers how local pension boards and scheme managers can be supported centrally and has been particularly active in designing board surveys and developing draft guidance for joint LPB applications.

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This is a great opportunity for an LPB member to get more involved with governance at a national level and represent the views of the sector.

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

Other News and Updates

Public Service Pensions and Judicial Offices Bill receives Second Reading

The Bill received its [Second Reading in the House of Lords](#) on 7 September 2021 and will now move to the Committee Stage (first sitting on 11 October 2021).

James Younger, Viscount Younger of Leckie, confirmed at the Second Reading that the Government:

- is aiming for the Bill to receive Royal Assent in early 2022
- will be depositing policy statements in the House Library in the coming weeks
- expects that some technical amendments will be required during the Bill's passage through Parliament.

The Bill was introduced to Parliament on 19 July 2021.

Government suspends earnings part of 'the triple lock'

The government announced on 7 September 2021 that it will be introducing legislation to [suspend the earnings part of the triple lock for one year](#).

As a result, basic and new State Pensions will increase in April 2022 by the higher of 2.5 per cent or inflation. This will also apply to those receiving the standard minimum guarantee in Pension Credit and widows' and widowers' benefits in Industrial Death Benefit.

The earnings part of the triple-lock was estimated to be above 8 per cent due to "unprecedented fluctuations to earnings caused by the COVID-19 pandemic".

Auto-enrolment news

On 21 September 2021, the Minister for Pensions and Financial Inclusion, Guy Opperman, confirmed in an [answer to a Parliamentary written question](#) that the Government is still committed to implementing the recommendations from the [2017 Automatic Enrolment review](#) in the mid-2020s.

In other news, Mel Charles, Director of Automatic Enrolment at the Pensions Regulator (TPR), published [a blog on automatic enrolment duties](#) on 26 August 2021. Mel reminds employers that, despite the effects from the pandemic, they must not neglect these duties.

PLSA publishes ‘An Employer’s Guide to Talking About Workplace Pensions’

On 15 September 2021, the Pensions and Lifetime Savings Association (PLSA) published [‘An Employer’s Guide to Talking About Workplace Pensions’](#).

The guide provides background on what employers (and pension schemes) can and cannot say with the intention of helping them navigate the advice / guidance boundary.

We reported in [FPS Bulletin 45](#) that TPR had produced similar [guidance on providing support to employees on financial matters](#) without being subject to Financial Conduct Authority regulation.

HM Treasury responds to Committee’s report on public service pensions

On 2 September 2021, [HM Treasury \(HMT\) responded to the report on public service pensions](#) from the House of Commons Committee of Public Accounts. The Committee published the report on 11 June 2021 and made six conclusions alongside recommendations for each one.

HMT agrees with five of the recommendations and sets out how it will progress these. It has already announced most of the actions (such as [consulting on the SCAPE discount rate methodology](#)). Additionally, HMT will:

- commission other government departments for analysis of the latest participation data for each public service scheme
- work with departments to standardise data collection on participation rates, including whether it could be broken down by member characteristics
- ask departments to update it on measures they are taking to improve participation among specific groups
- write to the Committee with an update in six months on the work to implement the McCloud judgment and to resolve the issues with the cost control mechanism
- write to the Committee by the end of 2021 with an assessment of how it is meeting the objectives of the 2014 / 15 pension reforms.

HMT disagrees with the Committee’s conclusion that it has done little to identify and manage the stark differences in average pensions between genders and other groups. It argues that such differences are a function of past differences in earnings rather than in differences in pension provision itself.

HMRC

HMRC newsletters/bulletins

On 30 September 2021, HMRC published [Pension schemes newsletter 133](#) containing important updates and guidance for schemes. Articles include:

- relief at source — annual return of information and notification of residency status reports
- pension scheme migration
- reporting multiple small pots payments using Real Time Information (RTI)
- updates to the HMRC Pensions Tax Manual

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 October 2021.

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

[31 August 2021 – One-pot ill-health and death recap](#)

[14 September 2021 – Remedy project management update](#)

[28 September 2021 – Scheme valuations and cost control overview](#) (First Actuarial)

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

Legislation

SI	Reference title
2021/1047	The Pensions Regulator (Employer Resources Test) Regulations 2021

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Useful links

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

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FPS Bulletin 50 – October 2021

Welcome to issue 50 of the Firefighters' Pensions Schemes bulletin. We hope that readers remain safe and well.

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 or suggested items for future issues, please email claire.hey@local.gov.uk.

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Calendar of events

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

Table 1: Calendar of events

Event	Date
FPS coffee morning	9 and 23 November 2021
Eastern regional group	2 November 2021
SAB SMA committee	4 November 2021
North West regional group	10 November 2021
North East regional group	18 November 2021
Eversheds Sutherland pensions conference	1 December 2021
Eastern regional group	7 December 2021
SAB	9 December 2021

FPS

Immediate Detriment Framework

On 8 October 2021, the [FBU and LGA published a joint statement](#) to announce the agreement of a [Memorandum of Understanding and Framework](#) for managing immediate detriment cases arising from the McCloud/ Sargeant age discrimination judgment.

We have prepared guidance to assist FRAs in adoption of the Immediate Detriment Framework. The guidance is available on the [age discrimination page](#) of the FPS Regulations and Guidance website and will be kept under review. Log-in details are required to access the page and can be provided to practitioners and administrators only.

FPS Member website resources added

A new section has been added to the FPS member website, www.fpsmember.org, titled [2015 Remedy](#). This section provides a background to the McCloud/ Sargeant age discrimination ruling and a series of frequently asked questions. More information will be added over the coming months.

Fire and Rescue workforce and pensions statistics published

The Home Office published [workforce and pensions statistics](#) for Fire and Rescue Services (England) on 21 October 2021. The pension scheme statistics, covering April 2020 to March 2021, reflect data returns on income, expenditure and membership submitted by all FRAs in England.

Some key results:

- Firefighters' Pension Scheme expenditure in 2020-21 was around £902 million.
- 84 per cent of expenditure was "recurring outgoing payments" and 15 per cent was "commutation payments". "Transfers" and "miscellaneous expenditure" totalled less than 1 per cent
- Firefighters' Pension Scheme income in 2020-21 was around £393 million.
- Employer contributions rose by 1 per cent to £262 million.
- In 2020-21, 67 per cent of income was "employer contributions", 30 per cent was "employee contributions" and the remaining three per cent comprised transfers, miscellaneous income, and ill-health charges.
- The Firefighters' Pension Scheme deficit in 2020-21 was around £509 million; a two per cent decrease compared with the previous year (£521 million).
- On 31 March 2021, the total number of pensioner members was 44,961. Of these, 90 per cent were members of FPS 1992.

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Consultation on FPS Wales

On 25 October 2021, the Welsh Government launched a consultation on amendments to firefighters' pension schemes in Wales.

The consultation relates to proposed amendments to the Firefighters' Pension Scheme (Wales) Regulations 2015 which will require all current members of the firefighters' pension schemes dating from 1992 and 2007 to join the 2015 Scheme on 1 April next year.

The consultation closes on 20 December 2021 and is available at the following link:

[Amendments to firefighters' pension schemes in Wales 2021 | GOV.WALES](#)

Technical query log

The current [log of queries and responses](#) is available on 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.

Please bear with us if you experience a delay in response to your technical query. As you can imagine, much of our resource is currently focused on remedy-related issues.

FPS England SAB updates

SAB LPB effectiveness committee vacancy

We have a vacancy on the [Local Pension Board \(LPB\) effectiveness committee](#) for an FRA LPB representative. The LPB effectiveness committee considers how local pension boards and scheme managers can be supported centrally and has been particularly active in designing board surveys and developing draft guidance for joint LPB applications.

This is a great opportunity for an LPB member to get more involved with governance at a national level and represent the views of the sector.

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

Other News and Updates

HMT consultation response: cost control mechanism

On 4 October 2021, HM Treasury (HMT) published its response to the cost control mechanism (CCM) consultation. The [full response to the CCM consultation](#) is available online.

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In summary, the government is proceeding with its three proposed options for reform:

- **Reformed scheme only design so the mechanism considers only past and future service in the reformed schemes.**

This measure is intended to ensure the right balance of risk between the member and the Exchequer, and to improve the stability of the mechanism.

- **Widen cost corridor from two per cent to three per cent of pensionable pay.**

The government expects a widened cost corridor of three per cent to balance effective cost control with stability. While the government acknowledged the Scheme Advisory Board's (SAB's) comments on scheme specific corridors, this was felt to be overly complex and more difficult for members to understand.

- **Economic check**

An economic check will be introduced so that any future breaches will only be implemented, and benefits amended, if the breach would still have happened taking long-term economic assumptions into account. The check will be linked to the Office of Budget Responsibility's independent measure of long-term GDP growth.

The government is aiming to implement all three reforms for the 2020 scheme valuations. The reformed scheme only design and economic check will be introduced through primary legislation. The widened cost corridor will be provided for in scheme regulations (secondary legislation).

HMT's response to the [consultation on the discount rate methodology](#) is expected soon.

The Public Service Pensions (Valuations and Employer Cost Cap) (Amendment) Directions 2021

On 7 October 2021, HMT published the [Public Service Pensions \(Valuation and Employer Cost Cap\) \(Amendment\) Directions 2021](#).

In February 2019, HMT paused the cost cap element of the 2016 valuations. This was due to the uncertainty regarding the cost following the McCloud and Sargeant litigation. There is now sufficient certainty regarding the costs and this direction allows schemes to conclude their 2016 valuations.

In a written statement made in February 2021 [[HCWS757](#)], the government said that early estimates indicated that some schemes could breach the cost ceiling when the valuations were finalised. However, the government decided that any impact on member benefits would be waived, as the mechanism may not have been working as intended.

The government also confirmed that any changes to employer contribution rates resulting from the 2020 valuations will be delayed to April 2024.

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September 2021 CPI rate announced

On 20 October 2021, the Office for National Statistics announced [the Consumer Prices Index \(CPI\) rate of inflation for September 2021 as 3.1%](#).

Section 59 of the Social Security Pensions Act 1975 (as amended) provides for public service pensions to be increased annually by the same percentage as additional pensions (State Earnings Related Pension and State Second Pension). In recent years, such benefits have been increased in line with the increase in CPI in the previous 12 months to September.

New webpage on how to avoid the Ombudsman

In October 2021, the Pensions Ombudsman (TPO) launched a new page on its website called [‘How to avoid the Ombudsman’](#). It contains 'top tips', links to case studies, key determinations, and new frequently asked questions.

TPO also published [guidance on communicating with pension scheme members](#). The note sets out simple steps that can be taken to resolve pension disputes and complaints without the need for TPO to be involved.

PDP staging call for input summary

Between 27 May and 9 July 2021, the Pensions Dashboards Programme (PDP) ran a staging call for input outlining the proposed order and timings for pension providers and schemes (data providers) to connect to the pensions dashboard.

The [SAB responded to the call for input](#), suggesting that staging for the Firefighters' Pension Scheme should be after the age discrimination remedy has been implemented and the first set of annual benefit statements issued successfully in Autumn 2024.

PDP received just over 60 responses to the call for input from a variety of stakeholders. These will be used to feed into further policy development of pension dashboards. It has published a [summary of the key themes](#) drawn from the responses, commenting under section 2.1.3.3:

“Those who disagreed with public service schemes staging as early as possible within the first wave, highlighted that implementing the McCloud remedy is the strongest priority over the next three years and it will take significant resources to implement the required changes. The McCloud remedy would make it hard for public service schemes to provide accurate ERI values until a much later date: the first time that the two sets of data will be provided in Annual Benefit Statements will be in 2024.”

PDP has shared the responses with the Department for Work and Pensions (DWP), the Financial Conduct Authority (FCA) and The Pensions Regulator (TPR) to inform policy development on staging. DWP's consultation on draft regulations is expected at the end of the year and will set out the staging proposition.

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HMRC

HMRC newsletters/bulletins

On 29 October 2021, HMRC published [Pension schemes newsletter 134](#) containing important updates and guidance for schemes. Articles include:

- Autumn Budget 2021
- extension to some of the temporary changes to pension processes as a result of coronavirus (COVID-19)
- relief at source declaration
- pension scheme migration
- accessing your business tax account
- pension flexibility statistics
- registration statistics

At the Autumn Budget on 27 October 2021, the government announced it will introduce legislation in 2022 to extend scheme pays reporting and payment deadlines for annual allowance charges. The policy paper and draft regulations relating to this change can be found in [FPS Bulletin 47](#).

Contracting-out reconciliation update

On 11 October 2021, HMRC published [Countdown Bulletin 56](#) with updates on:

- the closure of Scheme Cessation and Scheme Reconciliation eRooms
- raising queries with HMRC

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 9 November 2021.

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

[12 October 2021 - Immediate Detriment Framework](#)

[26 October 2021 – General FPS update](#)

A new [FPS coffee mornings page](#) has been added to the Events menu of the FPS Regulations and Guidance website to hold previous presentations.

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

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Useful links

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

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FPS Bulletin 51 – November 2021

Welcome to issue 51 of the Firefighters' Pensions Schemes bulletin. We hope that readers remain safe and well.

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 or suggested items for future issues, please email claire.hey@local.gov.uk.

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Calendar of events

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

Table 1: Calendar of events

Event	Date
FPS coffee morning	7 and 21 December 2021
Eversheds Sutherland pensions conference	1 December 2021
Eastern regional group	7 December 2021
SAB	9 December 2021
North East regional group	16 February 2021

FPS

Home Office consultation: Amendments to the FPS in England 2022

On 8 November 2021, the Home Office launched a consultation on the amendments to the pension scheme regulations to deliver the first set of changes to remove the transitional protections from the FPS 2015.

These changes enact the policy announced in February of this year and are consequential to the provisions in the [Public Service Pensions & Judicial Offices Bill](#) (PSPJO) currently before Parliament. The changes are intended to come into force on 1 April 2022.

This is part of the package of measures that the government is undertaking to remove the discrimination identified by the courts in the McCloud and Sargeant cases. The second phase will address the issue of giving members a retrospective choice of benefits for the remedy period. The Home Office will consult on this separately next year.

Please find details of the consultation and associated documents at the link here:

[Amendments to the firefighters' pension schemes in England 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/amendments-to-the-firefighters-pension-schemes-in-england-2022)

The consultation is open until Sunday 2 January 2022.

As it will be for individual Fire and Rescue Authorities (FRAs) as the Scheme Manager to apply the regulations, FRAs are encouraged to respond to the consultation.

Immediate Detriment Framework updates

On 19 November 2021, the [FBU and LGA published a joint statement](#) to update colleagues on the impact of [HMRC's policy note](#) of 27 October 2021 and the [Finance \(No.2\) Bill](#).

The guidance to FRAs available on the [age discrimination page](#) of the FPS Regulations and Guidance website has been updated accordingly. Log-in details are required to access the page and can be provided to practitioners and administrators only.

Sample letters to assist FRAs in administering the Framework have also been added to this page. Please note that these letters have not been developed by the communications group and are not endorsed but have been shared by FRAs/ administrators as examples of good practice and to reduce duplication of work. Some cases may require additional information or slightly alternative information to be added / amended on an ad-hoc basis.

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On 29 November 2021, we wrote to FRAs and other stakeholders to tell them that the [Home Office has withdrawn its informal and non-statutory guidance](#) on processing certain kinds of immediate detriment case ahead of legislation, with immediate effect. All versions of the guidance have been removed from the FPS Regulations and Guidance website.

The Home Office also gave the following update on funding:

“I also want to take this opportunity to provide some further clarity in relation to the funding position. As the Government does not advise that immediate detriment cases should be processed in advance of the legislation coming into force, we will not be in a position to provide any additional funding for those costs which are paid outside of the pension account. These costs include payments that are not considered to be legitimate expenditure under the pension scheme regulations and any associated administration costs including any charges from your pension administrator. These will need to be funded locally by your fire and rescue authority from local budgets.

In relation to immediate detriment costs paid from the pension account in the course of processing pipeline cases, FRAs will need to ensure that these payments comply with the financing regulations of the pension scheme. If they are considered to be legitimate expenditure then they will be considered for payment as part of the established processes for claiming the AME top up grant.”

We appreciate that this may be a cause of concern to colleagues who are considering to adopt or who have adopted the [MoU and Framework](#). We are considering the various aspects within the note and will write to FRAs and FRSs with further information as soon as possible.

Age discrimination remedy - member letters 1 April 2022

Under the communications pillar of the LGA's remedy [Project Implementation Document](#) deliverables, we said that we would provide communications to explain the effect of protected members moving to FPS 2015 with effect from 1 April 2022 and communications to members not affected by the changes to benefits.

A suite of letters has been developed in collaboration with the Fire Communications Working Group. These can be given by FRAs to scheme members ahead of prospective remedy implementation on 1 April 2022. This includes a tailored version for each member cohort: protected, taper protected, unprotected, and out of scope.

The letters are available on the new [prospective remedy page](#) of the FPS Regulations and Guidance website.

Guide to combining pension scheme service updated

The guide to combining pension scheme service in the FPS has been updated with new or amended definitions of remedy membership cohorts.

We have also replaced references to the “modified scheme” with the correct terminology of FPS 2006 special members/ membership, ahead of the anticipated second options exercise, to make sure that we are using consistent wording in all documents.

Clean and tracked versions of the guide can be found on our [guides and sample documents webpage](#) under the ‘Aggregation’ heading.

A to Z of pension terms updated

As part of our ongoing development of the FPS Member website, the [A to Z of pensions terms](#) page has been expanded significantly. We welcome any suggestions for additional content that would be useful to increase understanding of pensions terminology. Please email bluelightpensions@local.gov.uk.

Technical query log

The current [log of queries and responses](#) is available on 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: combining service (page 17). Queries from earlier months have been grey shaded to differentiate from new items.

Please bear with us if you experience a delay in response to your technical query. As you can imagine, much of our resource is currently focused on remedy-related issues.

As a reminder, the recently reinstated [Knowledge Hub technical forum](#) can be used as an alternative, if you need an informal steer from sector colleagues in the meantime. See [FPS Bulletin 47 – July 2021](#) for more information.

FPS England SAB updates

SAB SMA committee vacancy

We have a vacancy on the [Scheme Management and Administration \(SMA\) committee](#) for an FRA LPB representative. The main objectives of the committee are to provide guidance to the SAB to understand the value and cost of administration and to consider how scheme managers and administrators can best be supported by identifying best practice.

This is a great opportunity for an LPB member to get more involved with governance at a national level and represent the views of the sector.

[Click here to return to Contents](#)

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

Other News and Updates

Finance (No.2) Bill 2021/22

On 2 November 2021, HM Treasury (HMT) formally introduced the Finance (No.2) Bill 2021/22 to Parliament. The Bill includes several provisions that may affect the administration of the FPS.

Clause 9: Changes to annual allowance scheme pays deadlines

This clause changes deadlines associated with mandatory scheme pays. The period within which some members must give notice of their election will be extended. The deadline for administrators to provide information about annual allowance tax charges will also change.

Clause 11: Tax impacts resulting from the McCloud remedy

The clause provides HMT with the power to make regulations to address tax impacts that arise because of implementing the McCloud remedy. Provisions made under this section may be retrospective and may be different for different member types. The changes will have effect from 6 April 2022 or later.

You can follow the [progress of the Finance \(No.2\) Bill 2021/22](#) on the UK Parliament website.

Proposed amendments to the PSPJO Bill

Amendments to the PSPJO Bill have been proposed. You can read the proposed changes in the [marshalled list of amendments](#). You can follow the [progress of the PSPJO Bill](#) on the UK Parliament website.

Legal challenge: remedy costs and cost control mechanism

Unions across the public sector have launched a judicial review against HMT about including McCloud/ Sargeant remedy costs in the cost control mechanism. The FBU, GMB, and BMA argue that the cost of rectifying the discrimination should not be met by scheme members.

The provisional results of the 2016 cost cap valuation showed that all public service schemes were cheaper than expected. This would have led to a reduction in contributions or improvements in benefits from April 2019 had the cost control process not been paused.

Pension scams: new restrictions on transfers

On 8 November 2021:

- the Government published its [Response to Pension scams: empowering trustees and protecting members consultation](#)
- [The Occupational and Personal Pension Schemes \(Conditions for Transfers\) Regulations 2021](#) [SI 2021/1237] were laid
- the Pensions Regulator (TPR) published [TPR guidance on dealing with transfer requests](#), which includes a helpful flowchart setting out the transfer process.

The regulations take effect from 30 November 2021. They introduce further legal restrictions on a member's statutory right to transfer. The regulations give pension managers and administrators tools to act if they have suspicions about the circumstances that have led the member to request a transfer. The member will no longer be able to insist on a statutory transfer taking place in these circumstances.

PDP November newsletter

The Pensions Dashboards Programme (PDP) has published its [November newsletter](#). The newsletter includes links to:

- the PDP director's blog reflecting on recent achievements and looking forward to activity in the next few months
- the October progress update report
- dashboard providers' update, and confirms that successful applicants to help test the pensions dashboards ecosystem will be announced in December
- the identity hub which provides information about the approach to procuring an identity service
- the technical glossary which includes definitions of key terminology.

TPO stakeholder survey

The Pensions Ombudsman (TPO) is seeking your views on how you think it is doing and where it can improve things. TPO would be grateful if you could complete the [Stakeholder survey](#) which is open until Wednesday 8 December 2021.

One of TPO's strategic goals is to support and influence the pensions industry and the wider alternative dispute resolution sector to deliver effective dispute resolution. Your feedback is important as it will help to shape TPO's future planning, identify areas for improvement and improve the complaints process for its customers.

HMRC

HMRC newsletters/bulletins

On 30 November 2021, HMRC published [Pension schemes newsletter 135](#) containing important updates and guidance for schemes. The newsletter includes

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articles on:

- Relief at source
- Pension scheme migration
- Accessing your business tax account
- Annual allowance charge — members declaring their annual allowance charge on their Self Assessment tax return
- Accounting for tax return

Managing Pension Schemes service

On 18 November 2021, HMRC published a [Managing Pension Schemes newsletter](#) and new [GOV.UK guidance](#) with information on the new feature available on the Managing Pension Schemes service. These also include information on how to prepare to migrate your pension schemes to the Managing Pension Schemes service.

Pension scheme administrators can now view a list of schemes they need to migrate to the Managing Pension Schemes service. Currently it's a 'read only' list. You won't be able to migrate any pension schemes at this point. Only schemes with a status of 'open' on the Pension Schemes Online service will be included in the list.

To view the list of schemes, you'll need to be [enrolled on the Managing Pension Schemes service](#) using your existing 'A0' administrator ID. Scheme administrators with [multiple administrator IDs](#) will need to have completed the process of setting up their 'Master' and 'Ancillary' IDs, and have enrolled using their 'Master' ID.

HMRC will continue to keep you updated on the Managing Pension Schemes service through their [Pension Schemes Newsletters](#).

Please email migration.mps@hmrc.gov.uk if you have any further questions or feedback on the Managing Pension Schemes service, including the migration of pensions schemes.

2020/21 Event Reporting - Annual Allowance Statements and Lifetime Allowance

As last year, HMRC is prepared to accept scheme data regarding pension savings statements for 2020/21 from PCM customers on an excel spreadsheet rather than through the scheme's Event Report. All other scheme events for 2020/21, 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 2020/21 Event Report. The data must be submitted by 31 January 2022 and HMRC reserves the right to open enquiries based on any of the pension savings statement information provided.

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The data required for each member is:

- 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 list the data in the same line on the spreadsheet.

Guidance is included at [HMRC Pensions Tax Manual 161600](#) and [HMRC Pensions Tax Manual 167000](#)

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 your PCM 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](#), the Event Report has not yet been 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 2022.

If a 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 to them.

Events

FPS coffee mornings

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

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The next session is due to take place on 7 December 2021.

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

[9 November 2021 – FRA remedy self-assessment survey](#)

[23 November 2021 – Immediate Detriment Framework update - UPCs](#)

An [FPS coffee mornings page](#) has been added to the Events menu of the FPS Regulations and Guidance website to hold previous presentations.

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

Legislation

SI	Reference title
2021/1237	The Occupational and Personal Pension Schemes (Conditions for Transfers) Regulations 2021

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](#)
- [Welsh Government Fire circulars](#)

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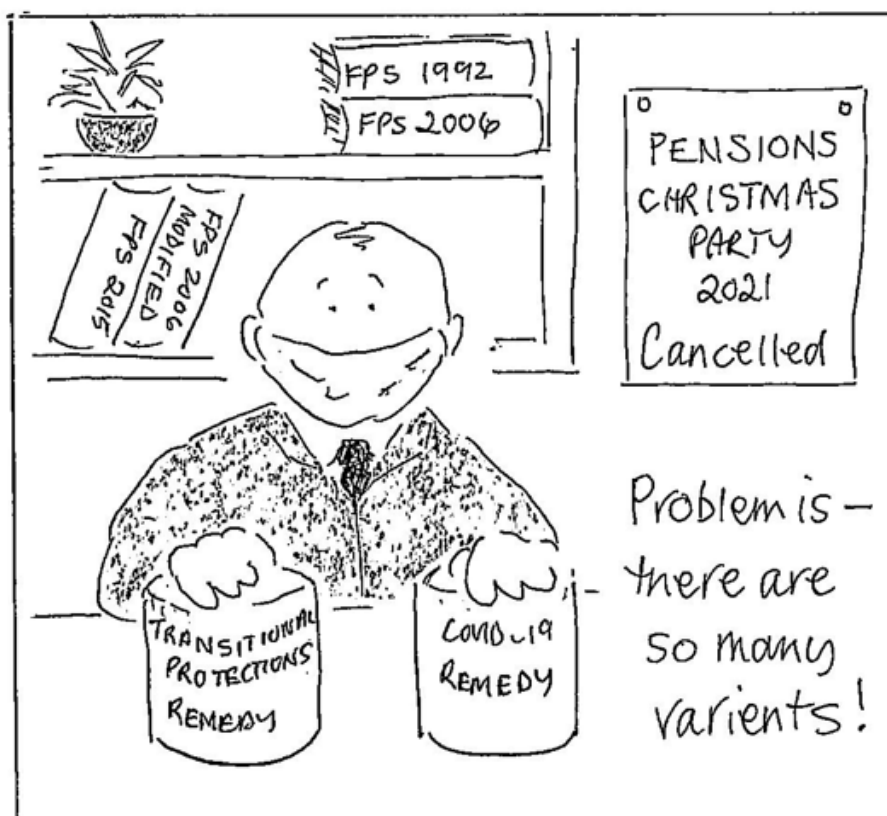
FPS Bulletin 52 – December 2021

Welcome to issue 52 of the Firefighters' Pensions Schemes bulletin.

We hope that readers remain safe and well. We would like to offer our thanks to all colleagues for their help and support during what has been another challenging year.

In finest December bulletin tradition, Eunice Heaney has kindly provided an illustration perfectly capturing some of the challenges we've faced and are continuing to face.

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 or suggested items for future issues, please email bluelight.pensions@local.gov.uk.

In a new test feature this month, we bring you details of two job vacancies within the UK FPS community. If you have a job you would like to advertise in the bulletin, please email bluelight.pensions@local.gov.uk.

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Calendar of events

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

Table 1: Calendar of events

Event	Date
FPS coffee morning	11 and 25 January 2022
North East regional group	16 February 2021
LGA Annual Fire Conference and Exhibition	15 – 16 March 2022
SAB	24 March 2022
SAB	23 June 2022
SAB	8 September 2022
SAB	8 December 2022

FPS

Immediate Detriment Framework update

Readers will be aware that on 29 November 2021 the Home Office withdrew its informal and non-statutory guidance on processing certain kinds of immediate detriment case ahead of legislation, with immediate effect. That withdrawal was accompanied by an HM Treasury note and Home Office statement on funding.

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

If you are taking decisions on immediate detriment cases following the withdrawal of the guidance, you should speak to your FRA's Nominated Contact.

Technical query log

The current [log of queries and responses](#) is available on 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.

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FPS England SAB updates

FRA remedy self-assessment survey research report and Chair's Christmas message

We are pleased to bring you this year-end message from Joanne Livingstone, chair of the FPS England Scheme Advisory Board, which announces the publication of the outcomes of the FRA remedy self-assessment survey:

“Dear friends & colleagues,

The Scheme Advisory Board (SAB) is pleased to be able to share with you the results of the survey undertaken by the SAB secretariat in order to provide us with insights into the current administration arrangements and the challenges being faced by FRAs, in the light of both business as usual and remedy based challenges.

[FRA remedy self-assessment survey research report](#)

We would like to thank you all for engaging with the survey and making the time to share your plans and thoughts with us. You will see that this has led to recommendations being made for both the SAB and other stakeholders. There are a number of recommendations in each of the key areas of future administration arrangements and for individual elements of remedy, namely data; contributions; processes; information, communications and coordination; knowledge, capability and capacity.

The SAB is well aware of the challenges and amount of work required to implement the various remedies and we expect that this risk will be prominent in your corporate risk registers. The SAB secretariat will be sending your individual responses to you, to benchmark against the overall average and we hope that this will help you to identify any areas for further focus to ensure that all FRAs have full project plans for the different teams required.

With regard to the communication challenges, the SAB hopes to provide assistance by making available a range of generic scenarios and some information videos in the coming months. Our committees have been busy working on this and are also looking at ways to ensure that the information resources are reaching the right people. All feedback is very welcome.

We know from the survey that the ticking timeclock is a concern. It does not seem a full year since I penned my first Christmas letter to you but we are already approaching the festive season so I thought I would also use this opportunity to reflect a little on the year's work. The year has been dominated by consultations and, in most but not all matters, their outcomes. The predominantly new Home Office pensions team has provided considerable engagement. We have all spent time considering the topics of remedy, 2016 valuations, and future valuation methodology for the cost cap and funding purposes. Meanwhile the pandemic has continued, though we are hoping that the main SAB meetings will be able to start to have a physical meeting element.

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There have been changes in the SAB membership during the year. And, of course, you will also be aware of the departure of Clair Alcock to be Head of Police Pensions and the promotion of Claire Hey to be our Senior Adviser. This has left the Bluelight Team temporarily reduced in numbers and I would particularly like to thank Claire for working so hard to fill the void. I look forward to welcoming the new recruits when they are on board.

I would like also to thank my fellow SAB members, the SAB committee Chairs and all those involved in the Fire Pension committees, for their invaluable contributions and impressive knowledge and willingness to work through the issues.

So happy reading of the survey and best wishes to you all for the festive season.

Joanne Livingstone. Chair, English Firefighters' Pension Scheme Advisory Board"

Open letter from SAB to HMT on withdrawal of ID guidance

On 29 November 2021, the Home Office withdrew its informal and non-statutory guidance on processing certain kinds of immediate detriment case ahead of legislation, with immediate effect. The decision to withdraw the guidance was indicated as being based on [HM Treasury's best assessment on the advisability of processing immediate detriment cases](#).

The Board has written an [open letter to HM Treasury on the withdrawal of the guidance](#) to request more information on the risks and uncertainties mentioned in their assessment.

SAB SMA committee vacancy

The Board continues to carry a vacancy on the [Scheme Management and Administration \(SMA\) committee](#) for an FRA LPB representative. The main objectives of the committee are to provide guidance to the SAB to understand the value and cost of administration and to consider how scheme managers and administrators can best be supported by identifying best practice.

This is a great opportunity for an LPB member to get more involved with governance at a national level and represent the views of the sector.

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

Other News and Updates

Appointment to the Bluelight Team

Following a successful recruitment campaign, we are delighted to announce that Claire Johnson has been appointed to the Bluelight Team in the role of Firefighters' Pensions Adviser (Employers) and will join the LGA on 24 January 2022.

[Click here to return to Contents](#)

Claire has 12 years' public service pension experience, in the LGPS and Firefighters' Pension Schemes. Claire commenced Local Government employment in 2010 at West Yorkshire Pension Fund, before moving to West Yorkshire Fire and Rescue Service in 2016 where she has undertaken the role of Pensions Manager.

Claire's role at the LGA is to provide support to FRAs and FPS practitioners. In addition, Claire will lead the development of national FPS communications.

Vacancy at West Yorkshire Fire and Rescue Service

Claire's arrival at the LGA leaves a vacancy for a Pensions Manager at West Yorkshire FRS. You can find out more about the role on the [WYFRS careers webpage](#).

The closing date for applications is 16 January 2022 and interviews will take place week commencing 24 January 2022.

Claire would be happy to have an informal chat with anybody interested in the role, please email claire.johnson@westyorksfire.gov.uk to organise this.

Vacancy at North Wales Fire and Rescue Service

Please find below details of a current vacancy for Senior Pensions Officer which is open to existing North Wales FRS employees and external applicants. The closing date for receipt of application forms is 12.00 noon on 14 January 2022.

[Advert for Senior Pensions Officer](#)

[Recruitment information pack for Senior Pensions Officer](#)

The application form can be found on the [Current Vacancies](#) page of the North Wales FRS website.

PDP December newsletter

The Pensions Dashboards Programme (PDP) has published its [December newsletter](#). The newsletter includes links to:

- the PDP director's blog reflecting on programme activity over 2021
- a press release confirming the selection of three potential dashboard providers
- the Pensions Administration Standards Association (PASA) guidance on data matching
- the monthly technical newsletter from the PDP's technical architecture team.

New TPO resources

The Pensions Ombudsman (TPO) has published the following resources for service users on its website:

- [Unacceptable behaviour policy](#)
- [Accessibility policy](#)
- [Determination factsheet](#)

[Click here to return to Contents](#)

HMRC

Enrolment on MPS

HMRC have recently been in touch with the Bluelight team to encourage FRAs who may be having difficulty enrolling on the Managing Pension Schemes (MPS) service to use the step-by-step guide that was issued to them by email on 25 August 2021. A copy can be provided on request – please email bluelight.pensions@local.gov.uk.

If authorities are still experiencing difficulties, they should email john.curtis@hmrc.gov.uk to arrange a call to talk through the process.

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 last session of the year took place on 21 December 2021. We will reconvene on 11 January 2022.

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

[21 December 2021 – Christmas coffee morning](#)

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

Legislation

SI	Reference title
2021/1308	The Occupational Pensions (Revaluation) Order 2021
2021/1319	The State Pension Debits and Credits (Revaluation) Order 2021
2021/1320	The State Pension Revaluation for Transitional Pensions Order 2021
2021/1394	The Pension Schemes Act 2021 (Commencement No. 5) Regulations 2021

Useful links

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

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



30 December 2021

Dear Humberside FRS Local Pension Board (by email),

As you will be aware, the Scheme Advisory Board (SAB) has recently published the [research report of the FRA remedy self-assessment survey](#) that was run between May and August to measure Fire and Rescue Authorities' preparedness for implementing remedy for McCloud/ Sargeant (age discrimination) and Matthews (FPS 2006 special members).

The survey received 100 per cent participation from all FRAs in England and the SAB would like to thank you for your submission. You will see that this has led to recommendations being made for both the SAB and other stakeholders.

As outlined in Joanne Livingstone's recent [Chair's message](#), I am pleased to attach a copy of your FRA's individual submission for discussion at your next Local Pension Board meeting. This will allow you to benchmark your responses against the overall results.

Many thanks again for your participation. If you have any feedback on the survey or any other areas of the SAB's work, please email the Board Secretariat at bluelight.pensions@local.gov.uk.

Yours sincerely,

Claire Hey
Senior Pensions Adviser/ Board Secretary

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 28, 2021 1:05:44 PM
Last Modified: Friday, May 28, 2021 1:46:17 PM
Time Spent: 00:40:32
IP Address: 83.100.176.215

Page 1: Section 1: Current arrangements

Q1 **Humberside Fire and Rescue Service**

Fire and Rescue Authority:

Q2 **West Yorkshire Pension Fund**

Who is your pension administrator:

Q3 **Third party - Local LGPS admin authority**

Is this arrangement:

Q4
Year current admin arrangement started:(Enter 4-digit year e.g. 2005 or don't know)

2011

Q5
Year current admin arrangement ends:(Enter 4-digit year e.g. 2005 or don't know)

2024

Q6 **No**

Do you plan to tender at the end of your current contract:

Q7 **Respondent skipped this question**

If yes to Q6, please indicate the method of procurement:

Q8 **3 - 4 "super" administrators**

Do you have a preference on future admin arrangements for the scheme:

Q9

What position within your FRA oversees delivery of pension administration:

Procurement Manager with lead responsibility for pension administration

Q10

Who line manages that post-holder:

Head of Finance

Page 2: Section 2: Data - pay, service, and contributions

Q11

Yes

Have you started work to identify data requirements for Sargeant (age discrimination):

Q12

Yes

Have you started work to identify data requirements for Matthews (special members). The linked factsheet gives more information about the second options exercise:

Q13

Yes

Do you expect to need additional resource for implementation for either or both of these projects:

Q14

What position within your FRA will lead on remedy data for both cases:

Procurement Manager with Lead responsibilities for Pensions

Q15

Which department manages ill-health retirements (IHR) for your FRA:

Human Resources with support from Pension Lead

Q16

Yes

The HMT consultation response indicates that IHR cases may need to be reassessed against the member's opposite scheme under Sargeant remedy. Will relevant teams be sufficiently resourced to revisit IHR cases:

Q17

No

Do you have any planned resilience in place to deal with revisiting IHRs:

Page 3: Section 2: Data - pay, service, and contributions**Q18****Outsourced**

Is your payroll service:

Q19**Outsourced**

Is your pension payroll service:

Q20**Yes**

Have you changed payroll provider or payroll system since 2015:

Q21

How many years do your payroll records go back:(Please answer in whole numbers)

26

Q22

Please detail any problems you can foresee obtaining pay data for the following:(N.B. Pay data for Sargeant will date back to 2015, pay data for Matthews could relate to as early as the 1970s)

Sargeant:

Data will need to be extracted from a combination of HR and payroll systems although complex will be achievable

Matthews:

Extract will be more complex due to payroll and HR System changes, full information may not be available**Q23**

For Matthews, eligible individuals will have the opportunity to buy scheme membership back to the start date of their employment. We are interested to know if you will still have access to historic employment records. How many years do your employment records go back:(Please answer in whole numbers)

26

Page 4: Section 2: Data - pay, service, and contributions**Q24**

Which department currently manages business as usual (BAU) contribution deductions:

Contributions are managed through the payroll provider based on salary information provided, rates are monitored during the monthly return process

Q25

Which department will manage your remedy contribution adjustment process:

Finance Section with assistance from payroll provider

Q26

Yes

Will you be able to obtain/ calculate backdated contribution data:

Q27

Do you expect to apply different solutions for different types of member e.g. active, deferred, pensioner:

Don't know yet,

Is yes, please give more details::
will need further information on the recovery process, although the calculation of backdated will generally be the same

Q28

Which department will manage adjustments to tax relief (PAYE):

Finance

Q29

The HMT consultation response indicates that interest will be due on amounts paid to and from the schemes. Which department will manage the interest process:

Finance

Q30

Please detail any issues you think might occur with adjustments of contributions:

need further information on the collection methods, Collection via PAYE for existing employees shouldn't be an issue but from those employees that have left will be more complex especially with regard to the taxation issues, as per the special members exercise previously undertaken

Page 5: Section 3: Processes and impact

Q31

Yes

Are you confident that existing tax processes are robust enough to perform annual allowance recalculations for up to 7 years of remedy:

Q32

FRA

Who undertakes Event Reporting to HMRC on scheme pays and unauthorised payments:

Q33 **Yes**

Does your FRA have a voluntary scheme pays (VSP) policy in place:

Page 6: Section 3: Processes and impact

Q34 **Yes**

Do you have a nominated finance lead on pensions:

Q35 **Yes**

Do you expect to need additional resource to deal with financial adjustments and impact on BAU:

Q36 **No**

Do you have an allocated budget for direct and indirect remedy costs:

Page 7: Section 3: Processes and impact

Q37 **Yes**

Do you have a nominated legal lead on pension matters:

Q38 **Yes**

If yes to Q37, is that person your "nominated contact" for the proceedings in Sargeant that are managed collectively by the LGA:

Page 8: Section 3: Processes and impact

Q39

Who leads on workforce planning and retention for your FRA:

Human Resources/ Organisational Development

Q40 **Yes**

Is the potential impact of Sargeant remedy being modelled into plans:

Q41 **Yes**

Are you able to identify the cohort of members affected by Sargeant remedy:

Page 9: Section 4: Information, communication, and coordination

Q42

Following the confirmation of deferred choice underpin (DCU) in Sargeant, please indicate what information you would like members to have access to (tick as many as apply): Please note this is not a menu or guarantee of delivery. It will allow us to understand individual FRA preferences but does not guarantee delivery of any of the options.

Scenarios for all member cohorts across the schemes

,
High-level modeller e.g. GAD spreadsheet,
Online tool directly linked to scheme membership data

Q43

Are you currently providing information to individual members:

Yes,
If yes, please provide details: :
Information has been provided to those who have requested and thinking of imminent retirement, but is heavily caveated as based on information available at the time and may be subject to change

Q44

Who do you think should provide information such as FAQs at key points in the remedy process:

LGA

Q45

Who do you think should be the main contact for individual member enquiries:

FRA

Q46

Who do you think should provide information to the workforce on timescales, next steps etc:

FRA

Q47

On a scale of 1 to 10 (1 being the lowest), please indicate how well you feel your FRA communicated the first special members options exercise in 2014/2015:

☆

5

Q48

Do you feel that communication was reflected in the numbers of individuals choosing to become a special member:

Yes

Q49

Please detail any suggestions for improvement for communicating the second options exercise:

Need more information at inception so that a considered approach to information flow can be taken from the outset, the previous exercise didn't have the systems and support in place that we now have and hopefully the full guidance will be available with all the associated documentation rather than services being left to find their way through what was needing to be done.

Q50**Regional collaboration**

How best would implementation of remedy be coordinated across FRAs in England:

Q51**Yes**

Does your FRA have a remedy project team:

Q52**Yes,**

If yes to Q51, does this include your administrator:

If no, please tell us why::

consultation on the process will be worked through with support from the administrator at all levels

Page 10: Section 5: Knowledge, capability, and capacity

Q53

On a scale of 1 to 10 (1 being the lowest), please indicate the level of internal pensions knowledge and capacity within your FRA:

☆

7**Q54****Establishing new roles/ teams**

What measures are you considering to address any shortfall in capacity (tick all that apply):

Q55**Yes**

Has remedy implementation been identified as a risk on your corporate risk register:

Q56**Yes**

If yes to Q55, has this been reported to your Local Pension Board:

Q57**LGA on behalf of FRAs**

Who do you feel is best placed to lead on policy engagement with central government on the legislation needed to bring in age discrimination remedy:

Q58**LGA**

Who do you feel is best placed to lead on direct service wide communication or provision of content for communication:

Q59

LGA on behalf of FRAs

Who do you feel is best placed to lead on engagement with pension administrators on implementation:

Q60

On a scale of 1 to 10 (1 being the lowest), how useful has this survey been to identify gaps in your planning:

☆

6

Any final comments: :

the process is going to be an extremely complex one and the Matthews case is going to a challenge due to the timescales involved, it would be advantageous if as much detail around the process could be developed centrally so that services aren't in the position of having to develop the process in addition to the identification the required information and detail

Report

FRA remedy self-assessment survey

December 2021

Research Report

**Prepared for the Firefighters' Pensions (England)
Scheme Advisory Board**

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1. Executive Summary

The survey invitation was issued by email to all Fire and Rescue Authorities (FRAs) following a public launch in May 2021. It was in the field from 20 May 2021 to 31 August 2021. The survey received a 100 per cent response rate, although not all FRAs answered all of the questions.

1.1 Current arrangements

Sixty per cent of FRAs are covered by just two providers in England. The number of single-FRA administrators is reducing as providers withdraw from the Firefighters' Pension Scheme (FPS) market due to the time and expertise required to administer the scheme.

Administration contracts began as early as 1940 and as recently as 2021. Over half of current arrangements are due to end within the next four years. Around one third of FRAs are planning to tender at the end of their current contract, with the most common routes to procurement being full tender and selection from a framework.

Preferences for future administration for the scheme were inconclusive. Half of respondents favoured retention of current arrangements or had no preference. Around one quarter preferred three or four "super" administrators, which will potentially occur reactively through natural attrition.

In most cases, delivery of the administration contract is overseen by a manager or head of department in human resources, finance, pensions, or payroll. posts are generally line-managed by a member of the senior leadership team.

1.2 Data

Eighty-five per cent of FRAs have started work to identify data requirements for age discrimination remedy, compared to just 28 per cent for the second FPS 2006 special members' exercise. This variance is reflective of the fact that the scope and mechanics of the second options exercise have not yet been established.

Work on remedies data is generally being led by a manager or head of department in human resources, finance, pensions, or payroll. Eighty-seven per cent of authorities expect to need additional resource for one or both of these projects.

Within the majority of FRAs, the ill-health retirement (IHR) process is managed by human resources and it appears that teams will be resourced to manage reassessment of cases that might be needed, as numbers are likely to be relatively small.

Just under half of FRAs have an in-house staff payroll service and around one quarter also provide pensioner payroll. Of the two-thirds who have outsourced pension payroll function, this is likely to sit with the pension administrator.

Over half of FRAs have changed either their payroll provider and/ or payroll system since the start of the remedy period in 2015, which may present additional challenge in obtaining historic payroll data. The number of years payroll records go back ranged from three to 40; for employment records the range is zero to 50.

Challenges relating to data collection for age discrimination remedy were specified as conversion of records from final salary and CARE, and the time taken to complete the exercise. For special members, many FRAs are concerned that data will no longer be available for the periods in question, and that there would be difficulty in identifying and verifying individuals.

Both business as usual and remedy contribution adjustment processes will mainly be dealt with by payroll and finance teams. This also includes the corresponding adjustments to tax relief. FRAs acknowledged that different processes may need to be applied for different cohorts of member. A more collaborative approach to the interest process is envisaged, with departments working together to ensure the correct payments are made or deducted.

The majority of respondents (91 per cent) confirmed that they will be able obtain or calculate backdated contribution data. Key themes identified in issues that might occur include available resource, lack of guidance, and impact on members.

1.3 Processes and impact

Confidence in existing tax processes for the purposes of recalculating pension growth for age discrimination remedy was split 50-50. Many FRAs identified that their administrator would be responsible for performing these calculations. Others commented that it was not possible to give an informed response until legislation and guidance is available.

Administrators were also reported to be primarily responsible for Event Reporting to HMRC.

At the time of the survey, it was anticipated that members would have to use Voluntary Scheme Pays (VSP) to settle any ordinary tax charges resulting from the remedy adjustments, therefore FRAs were asked if they had a VSP policy in place. Eighty-nine per cent have a policy and 11 per cent do not.

Almost all FRAs (94 per cent) have a nominated finance lead for pensions. Two-thirds expect to need additional resource to deal with financial adjustments and impact on business as usual. However, less than one quarter (22 per cent) of authorities have an allocated budget for direct and indirect remedy costs.

Sixty-three per cent have a nominated legal lead for pension matters and in 62 per cent of those cases, that person is the FRA's "nominated contact" for proceedings that are managed collectively by the LGA.

At almost all FRAs, workforce planning is managed by a member of senior human resources support staff or a uniformed equivalent. Eighty-nine per cent of FRAs confirmed that they are able to identify the cohort of members affected by age discrimination remedy and 83 per cent are modelling the potential impact into plans. Numbers range from between 15 to 4,000 members.

1.4 Information, communication, and coordination

In order to help member understanding of age discrimination remedy, FRAs indicated that a suite of member scenarios and online tools with a direct link to the pension administration system were the preferred options. Standalone tools such as a high-level modeller or other online solution were less popular.

Around half of FRAs are currently providing information to members, although this is primarily concerning immediate detriment or is generic information which has been circulated by the LGA.

All parties were felt to have a role to play in communications, with the LGA being the first choice to provide information at key points (70 per cent), administrators being the main contact for member queries (70 per cent), and FRAs providing information directly to the workforce (61 per cent).

FRAs had mixed views on coordination of remedy implementation, indicating a slight preference (33 per cent) for collaborative engagement with a shared administrator. Just under half of authorities have a remedy project team in place, which generally tend to include the administrator.

Communication for the first special members exercise was given an average rating of 5.93 out of 10, but whether this affected take-up rate was inconclusive. Key areas suggested for improvement in the second exercise were consistency of information and clear guidance.

1.5 Knowledge, capability, and capacity

FRAs measured their level of internal pensions knowledge and capacity at an average 5.67 out of 10. Popular options for addressing any shortfall were establishing new roles and accessing training.

Most FRAs (85 per cent) have included remedy implementation as a risk on their corporate register and subsequently reported it to their Local Pension Board.

The sector strongly agreed that the LGA are best placed to lead on policy engagement with government (98 per cent); on direct communication or provision of content (87 per cent); and on engagement with administrators (89 per cent). These responses give the LGA the necessary endorsement to lead on remedy related issues on behalf of FRAs and provide assurance that this is the preferred approach.

2. Introduction

In December 2018, the Court of Appeal judged that the ‘transitional protection’ offered to some members of the firefighters’ schemes as part of the 2015 public service pensions reforms gave rise to unlawful discrimination.

The Chief Secretary to the Treasury confirmed the requirement for a legal remedy across all public service pension schemes and a consultation was undertaken on the steps needed to address the discrimination.

On 4 February HM Treasury (HMT) published its [consultation response on changes to the transitional arrangements](#) to the 2015 public service pension schemes confirming that discrimination will be addressed in two parts.

To remove future discrimination from the schemes and ensure equal treatment, all remaining protected members who are not currently members of FPS 2015 will transfer into this scheme on 1 April 2022. This means that all future service for all members will build up in the reformed CARE scheme. Final salary benefits already built up are fully protected.

For benefits built up during the period of discrimination, 1 April 2015 to 31 March 2022, unprotected and taper members will be credited with final salary build-up in their original scheme. At retirement, all members will be able to keep their legacy final salary benefits or choose to receive the CARE benefits that they would have built up in the same period.

These adjustments will require significant change to systems and processes in place and will involve a considerable amount of time and resource to implement. Bearing in mind the unique management and governance structure of the FPS where each FRA is the scheme manager with legal responsibility for running the scheme, and is required to appoint an administrator, implementation will present a specific set of challenges to the sector.

In addition, a second options exercise in relation to [FPS 2006 special members](#) (Matthews) is expected to take place, in which eligible individuals will be able to elect to extend membership beyond 1 July 2000 to any employment as a retained firefighter prior to that date. No timescales are known at this stage. However, Matthews will have a considerable impact in terms of time and resources needed.

Finally, the FPS administration market has seen a reduction in the number of providers in recent years, potentially due to the rising complexity of the FPS. Procurement options when tendering for new administration services are limited¹.

As part of their statutory role to provide advice to scheme managers and Local Pension Boards (LPBs) relation to the efficient and effective administration and management of the Firefighters Pension Scheme, the Scheme Advisory Board wanted to understand more about arrangements for managing the pension scheme and specifically for implementing the age discrimination remedy.

Following a [paper to the Board on 10 December 2020](#), it was agreed that a survey would be issued to FRAs with the following objectives:

- The results of the survey will be used to determine whether FRAs have a preferred future model of administration and consider whether this is desirable and achievable.
- On implementation of remedy, the outcomes will illustrate how prepared FRAs are, what plans are in place, and where support is most needed.

¹ [SAB 17 Sept 2020: Paper 2 Pension administration market and complexity](#)

3. Methodology

The survey was designed by the Scheme Advisory Board secretariat in conjunction with the SAB, based on an equivalent survey of scheme managers in the Police Pension Scheme. The questionnaire can be viewed at the following link: [FRA remedy self-assessment survey question set](#).

The survey was launched publicly on 20 May 2021 at a virtual SAB update event. All FRAs in England and Wales were invited by email to participate in the survey on the same date with a clear instruction that the survey should only be completed once per FRA by the delegated [scheme manager](#) or an appropriate representative of the delegated scheme manager. The survey was advertised in [FPS Bulletin 45 – May 2021](#) with the same instruction.

FRAs were provided with a PDF or Word version of the questionnaire to allow internal collaboration before the online Survey Monkey was completed.

3.1 Fieldwork

The survey was issued on 20 May 2021 with a closing date of 30 June 2021. Although the closing date was not officially extended, a number of FRAs applied for a short extension which was granted.

In order to ensure that all FRAs had opportunity to submit their views, the survey was not officially closed until 31 August, when the final response was received.

The survey received a 100 per cent response rate of the 44 FRAs in England and 3 FRAs in Wales, although not all FRAs answered all of the questions. The survey summary showed a 96 per cent completion rate at an average of 37 minutes to complete.

Two FRAs did not submit complete responses; one answered no questions beyond section 1 (current arrangements) and the second gave holding responses, for example typing random letters into free-text boxes where it was not possible to progress through the survey without providing an answer.

Throughout the report percentages in figures and tables may equate to more or less than 100 per cent due to rounding

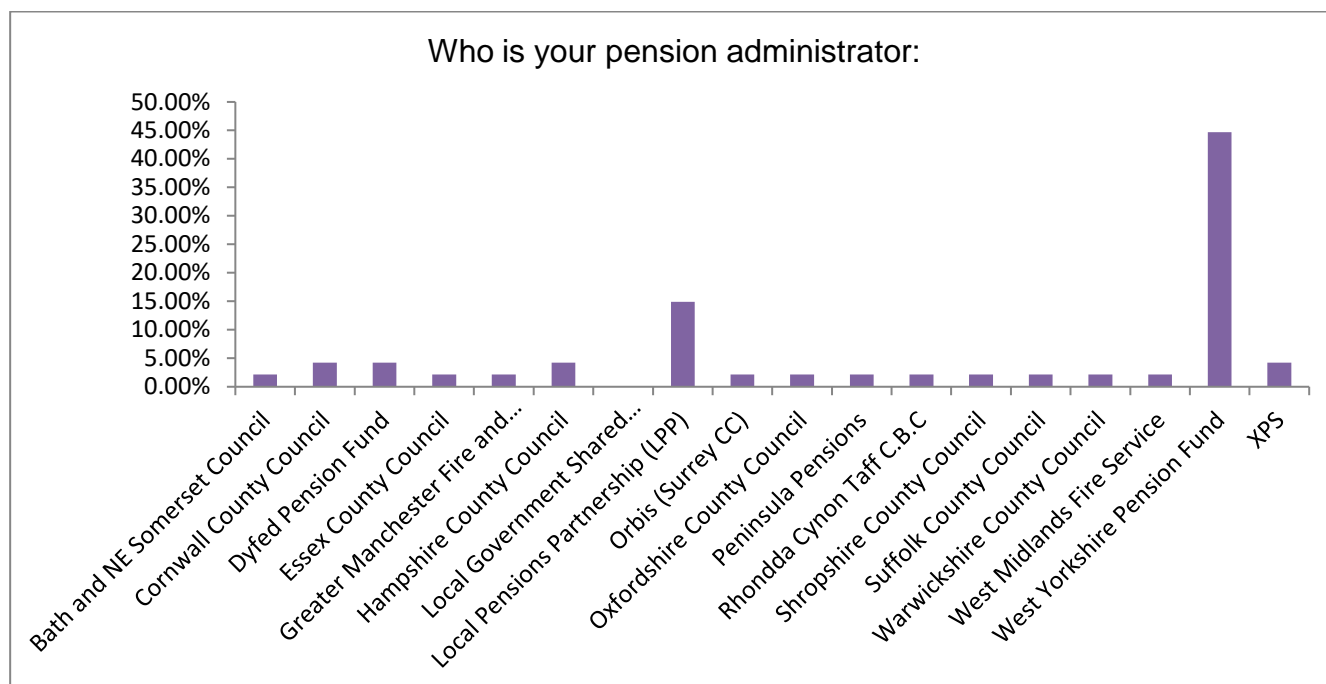
A list of FRAs is attached at [Annex A](#).

4. Research findings

4.1 Current arrangements

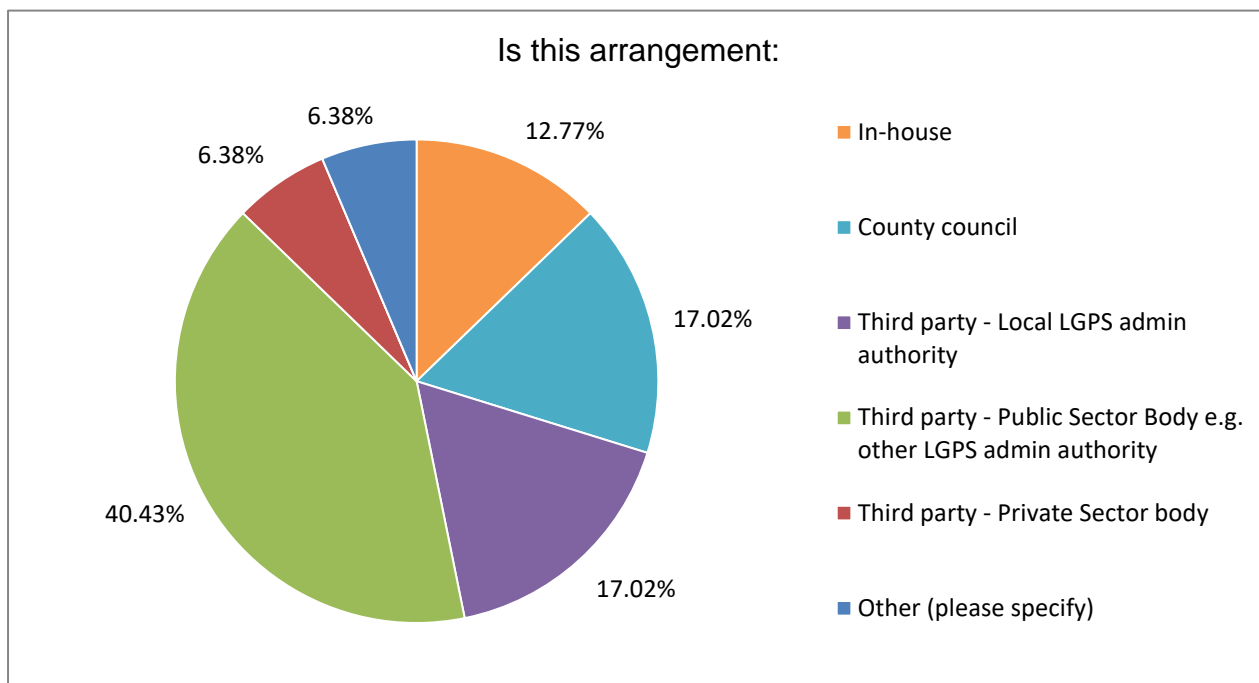
In this section we asked about pension administration arrangements and internal management reporting lines for pensions.

Almost 45 per cent of FRAs are administered by West Yorkshire Pension Fund. Local Pensions Partnership have a 15 per cent share of the market. Some administrators provide services to two FRAs and 11 administrators have a single FRA relationship. In the time that the survey was in the field, one administrator withdrew from the FPS market and another has withdrawn since the survey closed. One FRA is currently tendering for new administration services and the number of providers will reduce again. This is clear evidence of the shrinking marketplace for FPS administration.



When asked to confirm the type of administration arrangements in place, there appeared to be a lack of clarity over terminology used as the individual responses did not align with our expectations. For example, six FRAs reported that their administration is carried out in-house, but there are only two authorities that are wholly administered in-house.

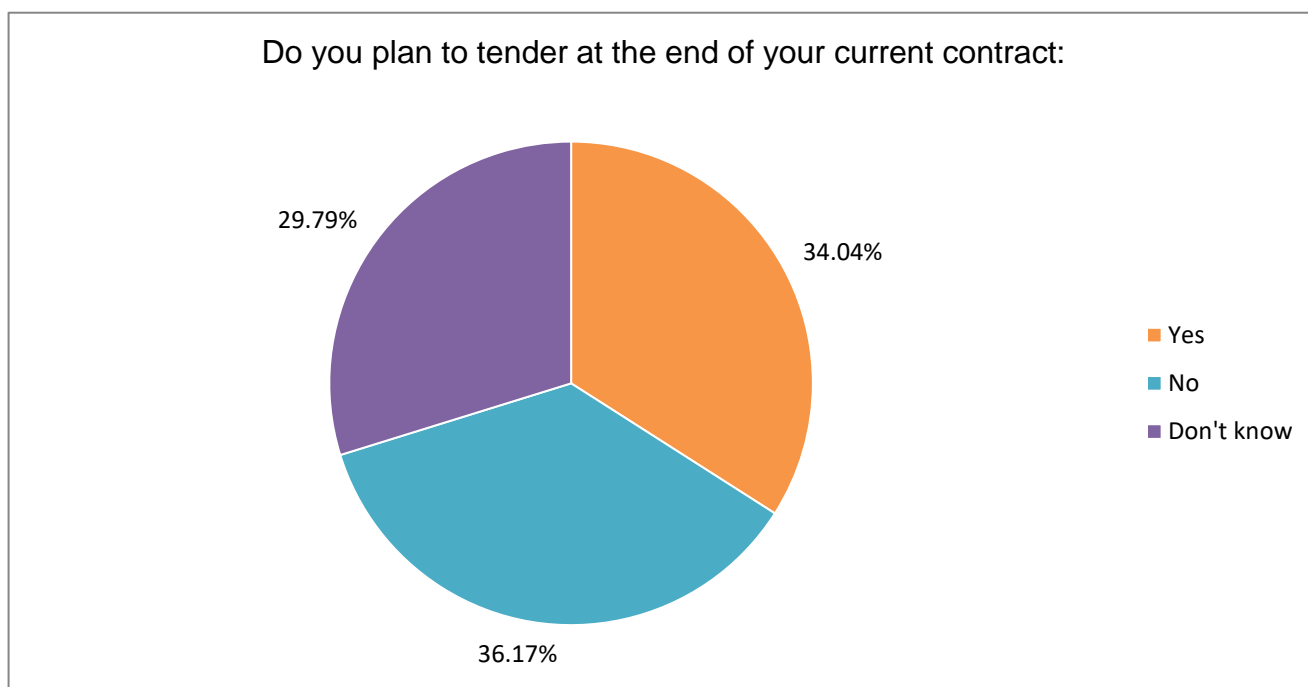
The main discrepancies seemed to occur between in-house and local LGPS fund, and county council and local LGPS fund, although the boundaries are less clear between the latter pair. The percentage of third party – other LGPS fund was broadly in line with expectations. Three FRAs selected other and noted that their administration is carried out as part of a shared service agreement. In hindsight, this would have been a useful addition to the dropdown menu.



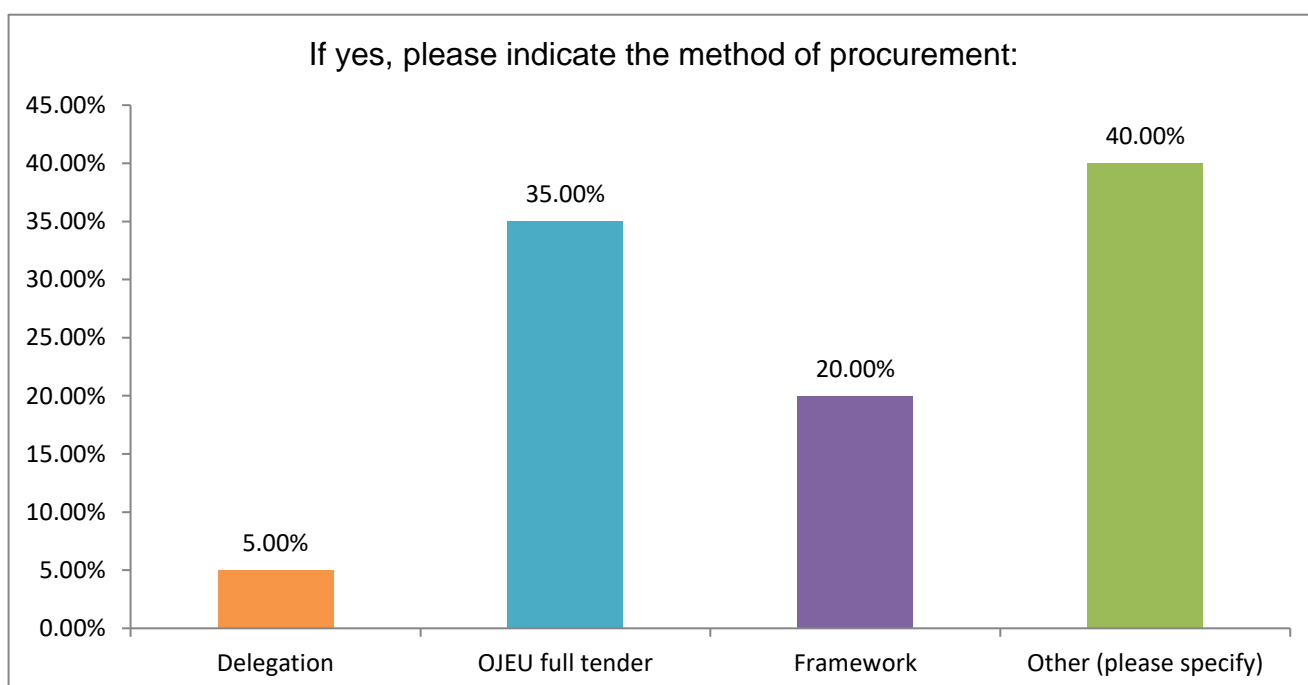
Dates that administration contracts started varied from 1940 to 2021. Five FRAs did not know when their current arrangement began.

Over half (54 per cent) of current administration arrangements are due to end within the next four years, and a further 9 per cent before 2030. Seven FRAs did not know this information and 11 reported that their arrangement is open-ended. There was no discernible pattern of FRAs with a particular administrator who do not have an end date to their contract. There is a possibility that smaller administrators will use this opportunity to relinquish their FPS contracts as it has been reported anecdotally that some struggle with the time and expertise needed to administer the scheme.

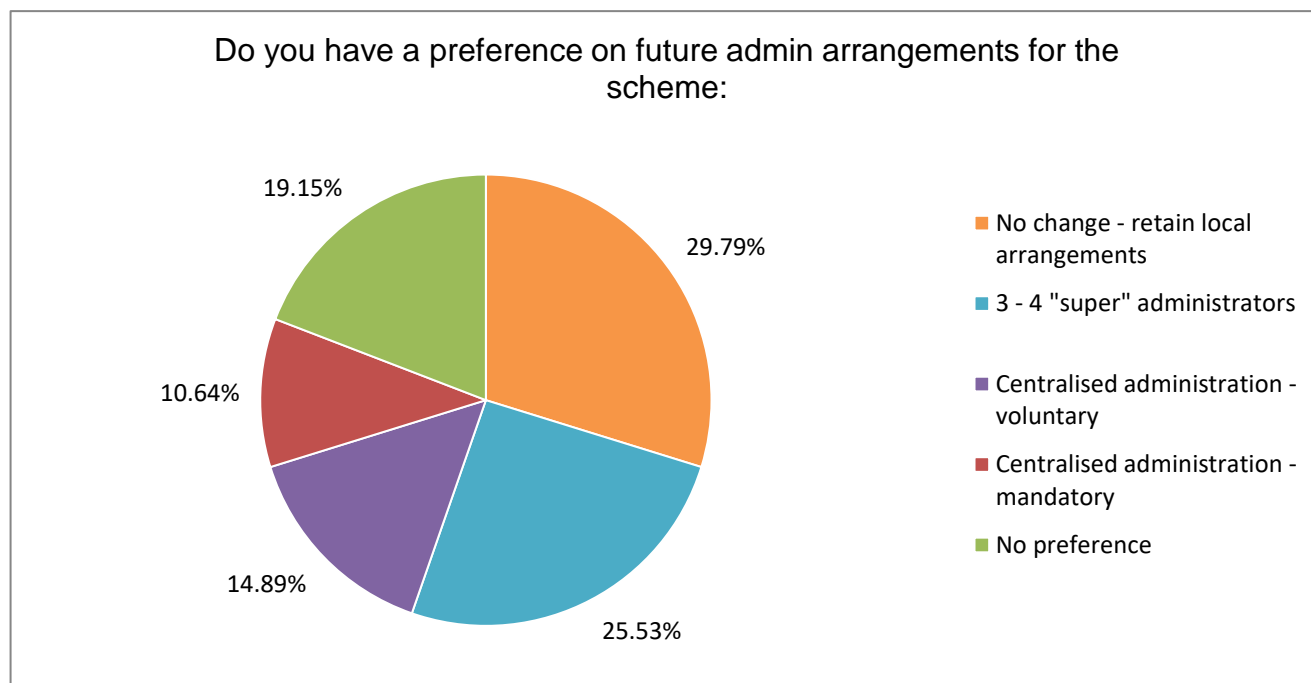
The split between FRAs planning to tender at the end of their current contract was fairly evenly distributed.



As noted, the routes to procurement for FRAs are limited. The options available are delegation, OJEU full tender, and framework. It should be noted that the only existing framework includes just one administrator who provides FPS services. Twenty FRAs provided a response to this question and there was no clear preference between the options. One respondent commented under “Other” that OJEU no longer exists but when tendering, the equivalent at that time will be used.



Given the complex structure and legislative background to the FPS, commentators have often speculated on whether there is an argument for centralising scheme administration. Over recent years we have seen a gradual reactive shift towards one or two main providers, which would appear to support this suggestion. However, the responses to preference on future arrangements for the scheme were inconclusive, with almost 30 per cent wishing to retain local arrangements and 20 per cent expressing no preference. One-quarter preferred a smaller number of “super” administrators and around the same number stated that administration should be centralised, either on a voluntary or mandatory basis.



In order to establish and review internal controls, we asked FRAs what position oversees delivery of pension administration, and who line manages that post-holder. As a free-text field, the responses varied considerably. Lists of the responses are available at [Annex B](#) and [Annex C](#) respectively.

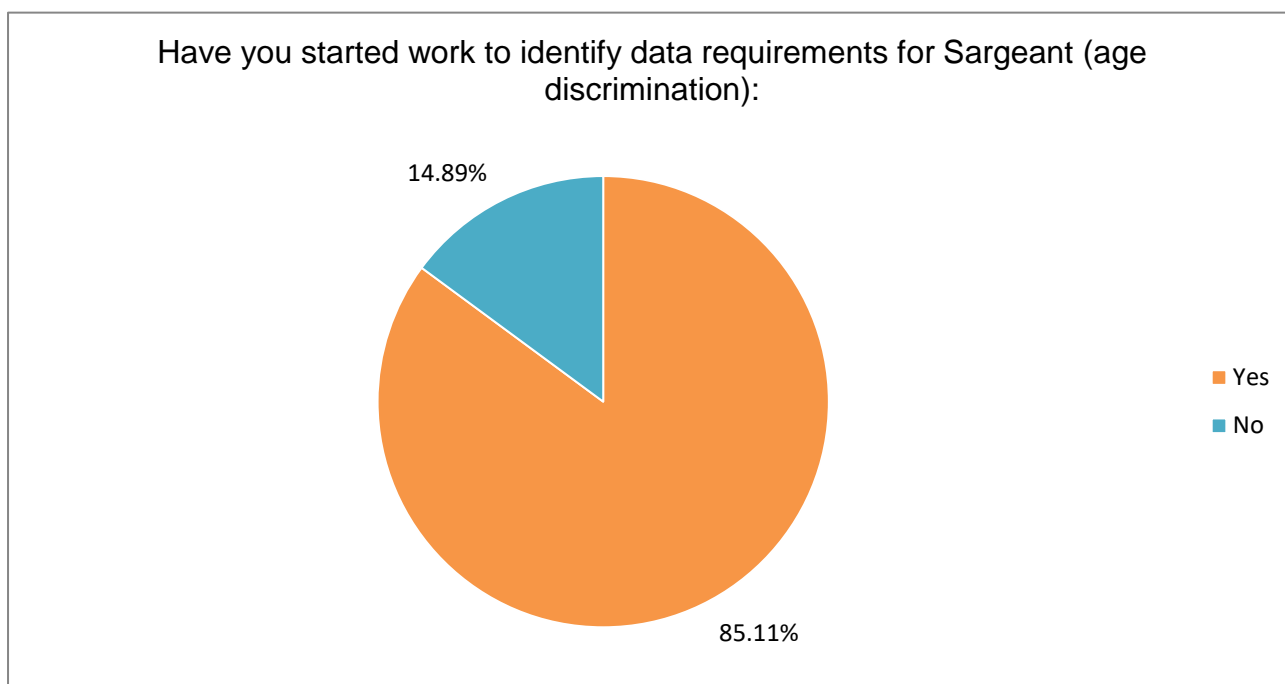
The majority of those overseeing the delivery of the administration contract are a manager or head of department in either human resources, finance, pensions, or payroll. These posts are generally line managed by a member of the senior leadership team, such as a director, or in many cases, the chief fire officer. This is broadly in line with our expectations for scheme manager delegation.

4.2 Data - pay, service, and contributions

4.2.1 General provisions

This section asked questions about FRA’s plans for managing data in Sargeant and Matthews.

Firstly, we asked whether FRAs had started work to identify data requirements for Sargeant in line with the [data collection tools](#) issued by the LGA. Eighty-five percent indicated that work had begun. Respondents were asked to comment on what key requirements or actions had been identified, or if they had not started, why that was the case.



Where a free-text response had been entered, the majority of FRAs indicated that work had begun to identify members eligible for remedy and how to obtain the necessary data, in collaboration with payroll providers and administrators. Others also identified that immediate detriment cases were being processed.

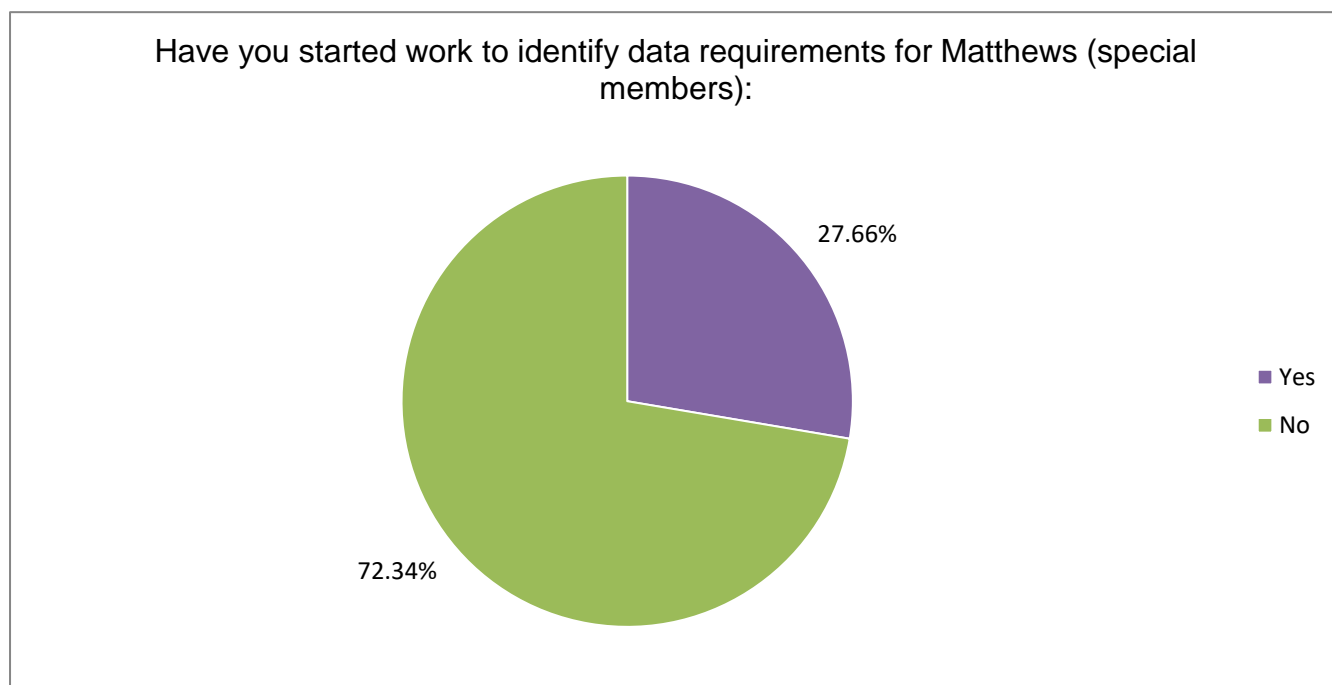
Key requirements were stated as further clarity on technical issues and additional resource.

Of the seven FRAs that had not started work to identify data requirements, two commented that they were awaiting the software data extract, and one had been delayed due to transferring to a new pension administrator.

When asked the same question on data collection for Matthews, the percentage results were markedly different, with approximately three-quarters (72 per cent) stating that they had not started scoping requirements, and one-quarter (28 per cent) who had.

These findings were to be expected; as reflected in the additional commentary, there has been no confirmation yet as to eligibility or the mechanics of the exercise, as these details are still subject to legal negotiations. Many FRAs also identified that they are not sufficiently resourced to undertake two large-scale data interrogation exercises at the same time. One FRA confirmed that they do not have any retained firefighters and will therefore be exempt from the options exercise.

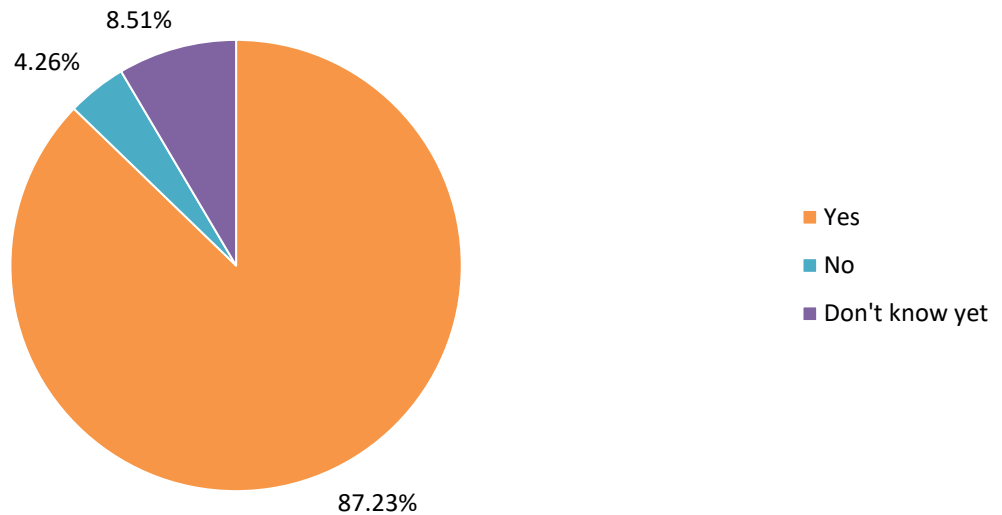
Of the minority who have started to look at what will be required, the detailed responses indicated a broad understanding of what will be needed and an intention to use the base data and communications from the first exercise as a starting point.



Perhaps unsurprisingly, 87 per cent of FRAs indicated that they expect to need additional resource to implement one or both projects. Of the two authorities that responded negatively, there is a high likelihood that their expectation is incorrect. One appears to have not given credible responses to the survey beyond the first section, as evidenced by input to free-text fields such as “joe bloggs”, and the other has stated that their administrator will implement remedy for them, which will almost certainly not be the case.

There was some correlation between FRAs who had not started data work for Sargeant and those who felt they would not need additional resource or did not know.

Do you expect to need additional resource for implementation for either or both of these projects:



To ascertain that remedy is being overseen at a senior level within an authority, we asked FRAs to confirm what position will lead on remedy data for both Sargeant and Matthews. Common responses were a manager or head of department in either human resources, finance, pensions, or payroll. It is again likely that this might be the delegated scheme manager and has been stated as such by some respondents.

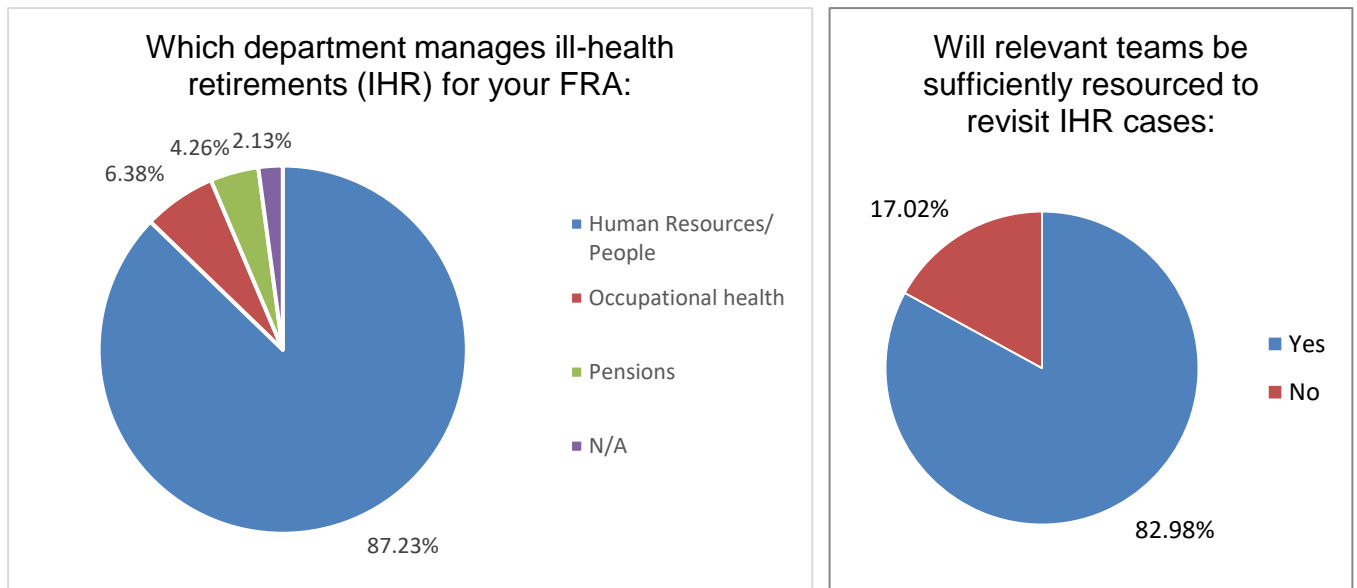
A list of the responses is available at [Annex D](#).

Moving on to specific requirements for age discrimination remedy, the HMT consultation response indicates that ill-health retirement (IHR) cases may need to be reassessed by an Independent Qualified Medical Practitioner (IQMP) against the member's opposite scheme to establish entitlement in that scheme.

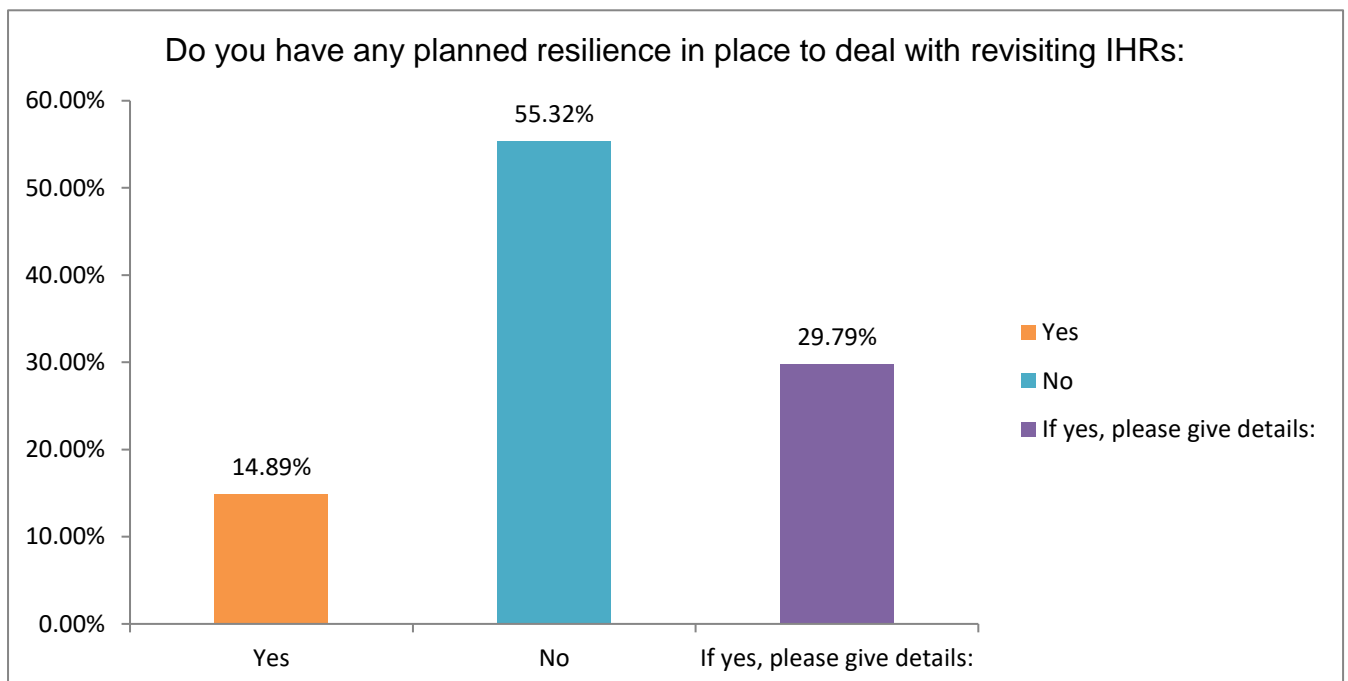
We asked FRAs to confirm which department manages IHR within the organisation and whether relevant teams will be sufficiently resourced to revisit these cases.

While the first of these questions invited a free-text response, answers tended to fall into one of four categories and so have been grouped into themes of human resources, occupational health, and pensions. One FRA gave a N/A response. "Human resources" or "People" was by far the most common answer at 87 per cent and this would be in line with our experience and expectation.

Eighty-three percent went on to confirm that relevant teams would be sufficiently resourced to manage reassessment of IHRs which is very positive. Despite the nature of a firefighter's employment, ill-health retirements are still relatively infrequent.



This statistic is borne out by the next question which asked whether FRAs had any planned resilience in place to deal with revisiting IHRs. While responses were split almost evenly between “yes” (45 per cent) and “no” (55 per cent), the detailed comments confirmed that the number of cases was likely to be small and requirements could therefore be met within existing resources.



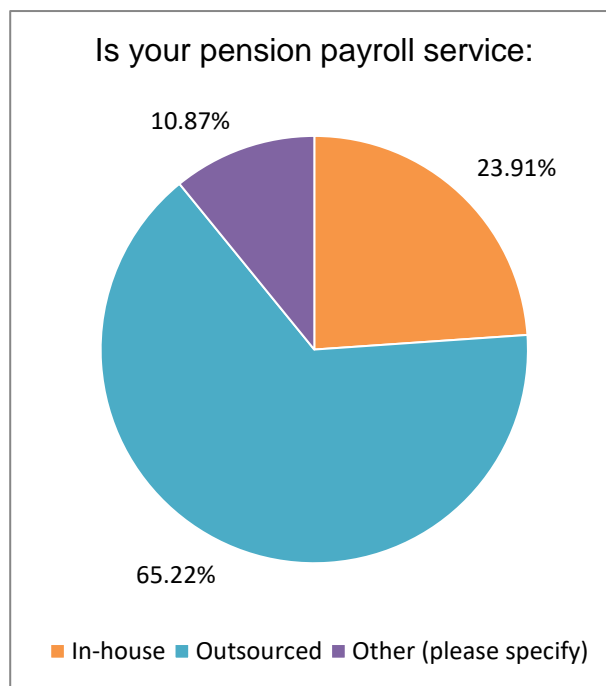
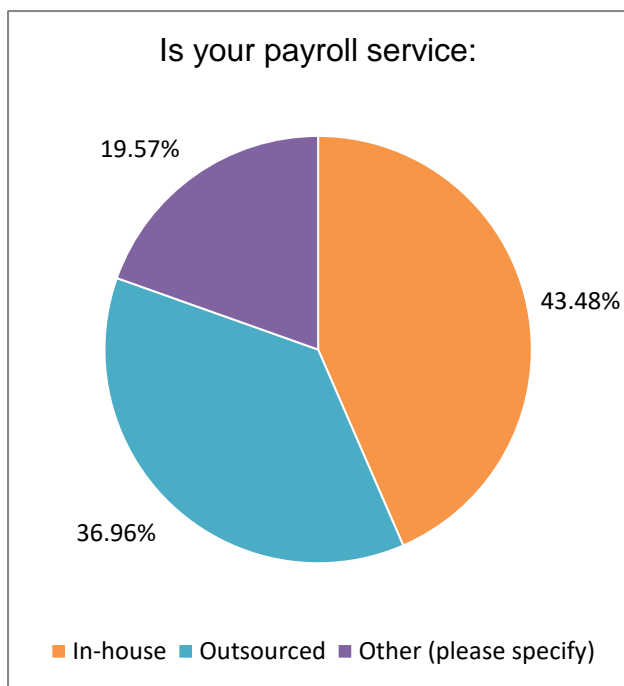
If yes, please give details:
Small number of cases need to be revisited, additional resources available within the pension activity
XPS have a working risk assessment register which monitors the project as a whole including legislation, policy, systems, data and resourcing.
We had identified 2 cases, which has already been reassessed
No resource currently available
Low numbers of IHR, not presently seen as a concern.
There aren't a significant number & will be met through the existing HR & Occupational Health provider
we have very few IHR cases
Additional trained department members.
Occupational Health
within existing team resources
extra resources obtained through McCloud/Sargent project
We have third party OH and pensions administration services.
Part of a wider Shared Services arrangement that has capacity
Additional resource not required due to the small number of cases

4.2.2 Pay and employment data

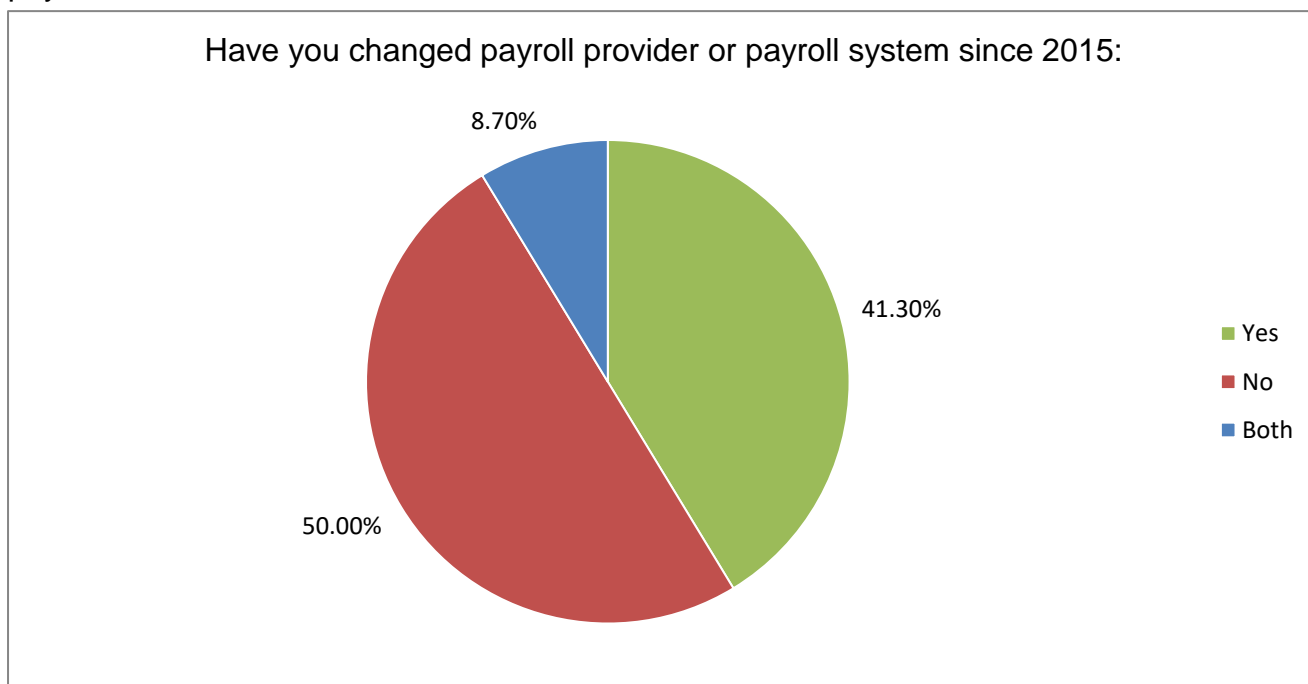
The next section sought information about FRAs' payroll data and services and employment records to establish how easily data might be obtained and identify any additional processes or collaboration that would be needed.

Forty-three per cent of FRAs have an in-house payroll service, compared to 24 per cent for pension payroll. Accordingly, 37 per cent have outsourced their payroll function for employees, but 65 per cent have an outsourced pensioner payroll. In many cases, this will be outsourced to the pension administrator.

For the 20 per cent who indicated "other" for payroll service, this was specified as a hybrid arrangement or as part of a shared service; and for pension payroll, 11 percent of "other" was defined as a shared service or part of the pension administration service.



Half of FRAs have changed either their payroll provider and/ or payroll system since the start of the remedy period in 2015, which may present additional challenge in obtaining historic payroll data.



The number of years that payroll records go back ranged from three to 40, with a mean value of 16.

FRAs were asked to detail any problems they could foresee with obtaining pay data for Sargeant and Matthews, noting that pay data for age discrimination will date back to 2015 and for the second special members options exercise could be as early as the 1970s.

While some FRAs did not anticipate any difficulties with collating the necessary data for Sargeant, others stated that creating schedules of alternate contributions and differences in pensionable pay between final salary and CARE schemes would cause complexity. Some FRAs commented that changing systems or providers would create additional challenge, as noted above, and further, that collating data from multiple sources may lead to inaccuracies.

Several FRAs noted that while obtaining the remedy data in itself would not be difficult, it would be time-consuming.

Collection of relevant data for Matthews is clearly deemed to be more challenging. The majority of respondents expressed concern that data will no longer be available for the periods in question, and that there would be difficulty in identifying and verifying all eligible individuals. Some FRAs added that although they may have some archive information available, it is unlikely to be in electronic format, for example hard copy ledgers or microfiche.

A full breakdown of the free-text responses is available at [Annex E](#).

Additionally, for Matthews, as eligible individuals will have the opportunity to purchase FPS 2006 membership from the start date of their employment, FRAs were asked to indicate how many years their employment records go back. Here the number of years ranged from zero to 50, with a mean average of 21.

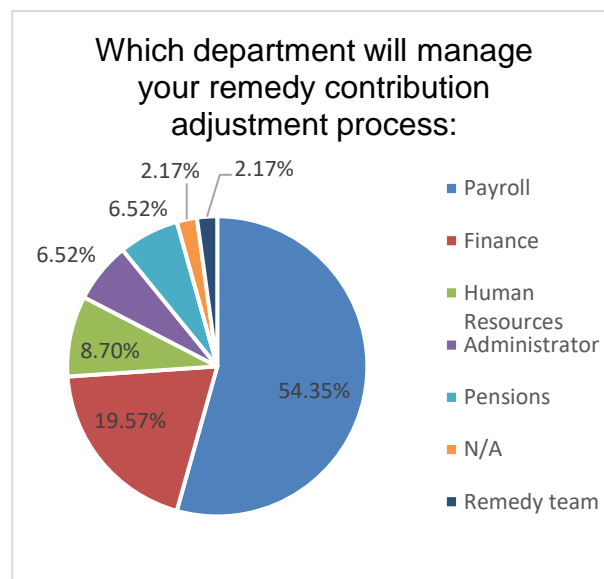
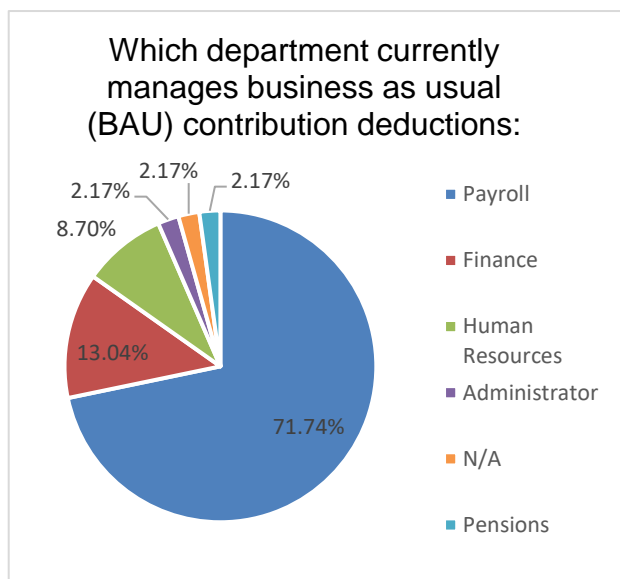
4.2.3 Contribution data

Finally in this section, we asked FRAs to explain their plans for managing the contribution adjustments that will be required for all members who are eligible for age discrimination remedy. These adjustments will need to be done when member's benefits are converted from CARE to final salary for the remedy period, and potentially again at retirement, if the person elects to receive their deferred choice underpin of reformed benefits.

We asked FRAs to specify which department currently manages business as usual contribution deductions and which department will manage the remedy contribution adjustment process, to test thinking and establish any common themes.

The free-text responses were again grouped by category and while the categories were similar across both questions, the percentage split varied. "Payroll" and "Finance" were the most common replies to both questions, with the remainder split between a dedicated pensions department or HR.

Although the results were broadly comparable, FRAs acknowledged within their responses that input from different departments or different processes for different cohorts of member would be necessary, for example, payroll for active members and the administrator for deferred and pensioner members where an employment relationship no longer exists.



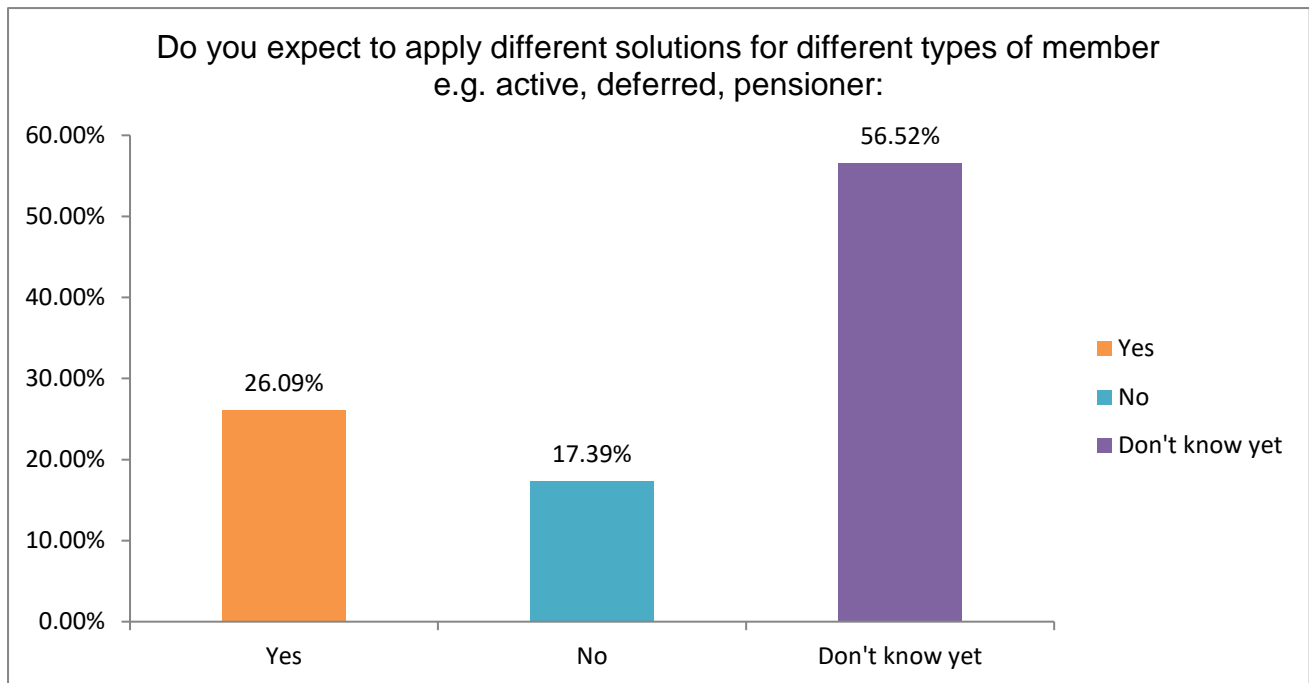
The results were less conclusive when authorities were asked directly if they expected to apply different solutions for different types of members. Here, over 50 per cent said that they did not yet know.

Respondents were asked to give more detail if they answered “yes”; this would more helpfully have been extended to also include the “no” responses. Where differences were identified, FRAs noted that tax relief can only be given at source for active members, therefore a different process would apply for pensioners and deferred members:

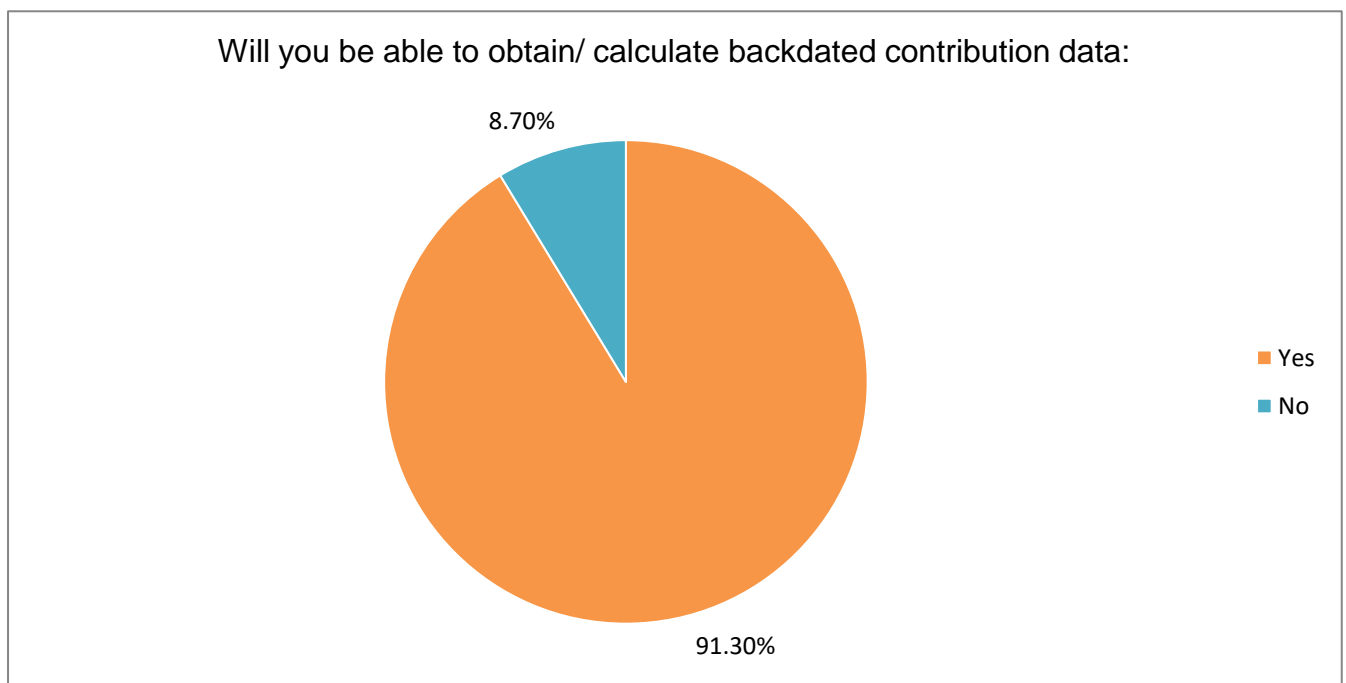
“Only active members’ contributions can be collected or refunded via payroll, giving tax relief at source. For deferreds and pensioners, contributions could be collected by the AR department or by the administrator as a deduction from pension payable. The Regulations should make clear what method is appropriate. Contributions cannot be collected until after the member has made his/her choice.”

Respondents also commented on differing personal circumstances and expressed concern over affordability.

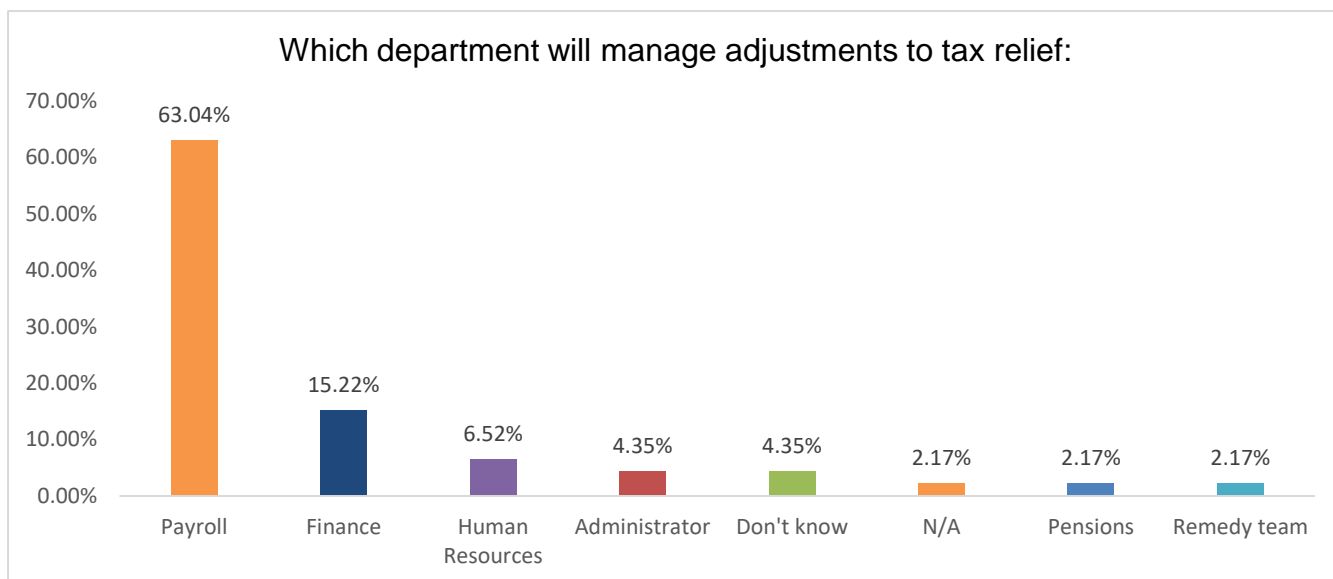
There appeared to be some confusion between legislative remedy and immediate detriment cases processed before regulations and software are in place; for clarity, immediate detriment is not within the scope of this survey.



Despite this uncertainty, 91 per cent of respondents indicated that they will be able to obtain or calculate backdated contribution data. It would have been useful to understand why the remaining 9 per cent, equivalent to four FRAs, felt that this will not be the case; unfortunately, this additional information was not requested.

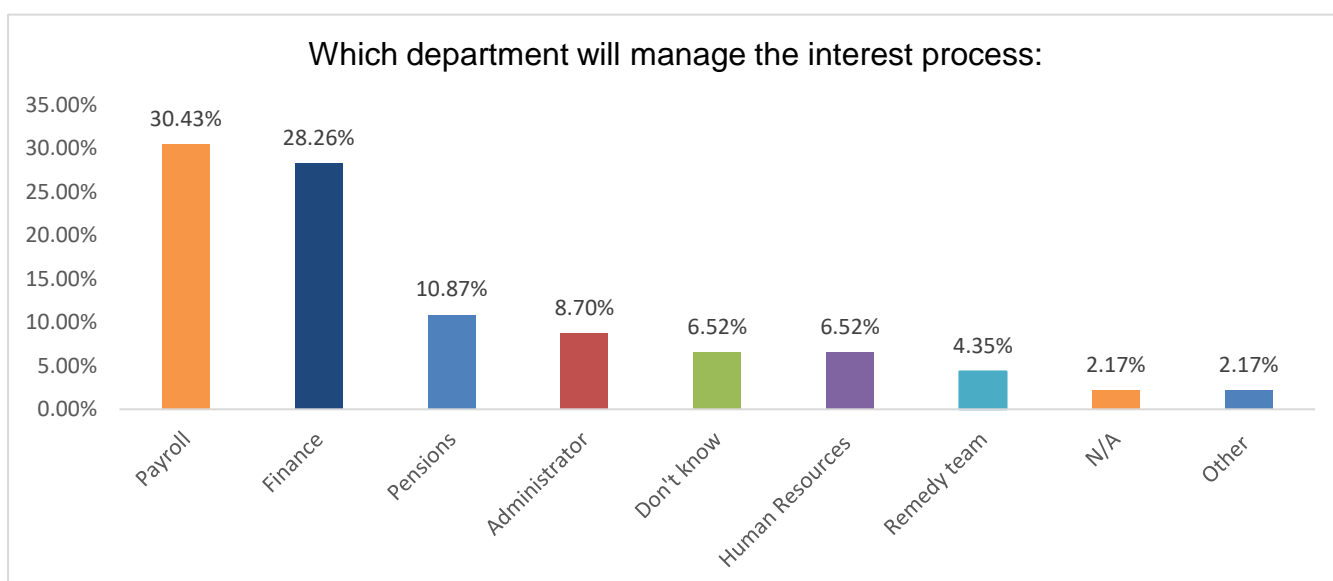


Adjustments of contributions at either point in the remedy process will necessitate corresponding adjustments to tax relief. Sixty-three per cent of FRAs confirmed that these adjustments will be managed by the payroll department, whether this is in-house or outsourced. Some FRAs indicated that this may also depend on the cohort of member.



The HMT consultation response indicates that interest will be due on amounts paid by schemes to members, and vice-versa. This will include on contributions adjustments. Here, 30 per cent of FRAs stated that payroll departments will manage the interest process, while 28 per cent indicated that finance teams would be responsible.

A more collaborative approach to the interest process is envisaged, with departments working together to ensure the correct payments are made or deducted.



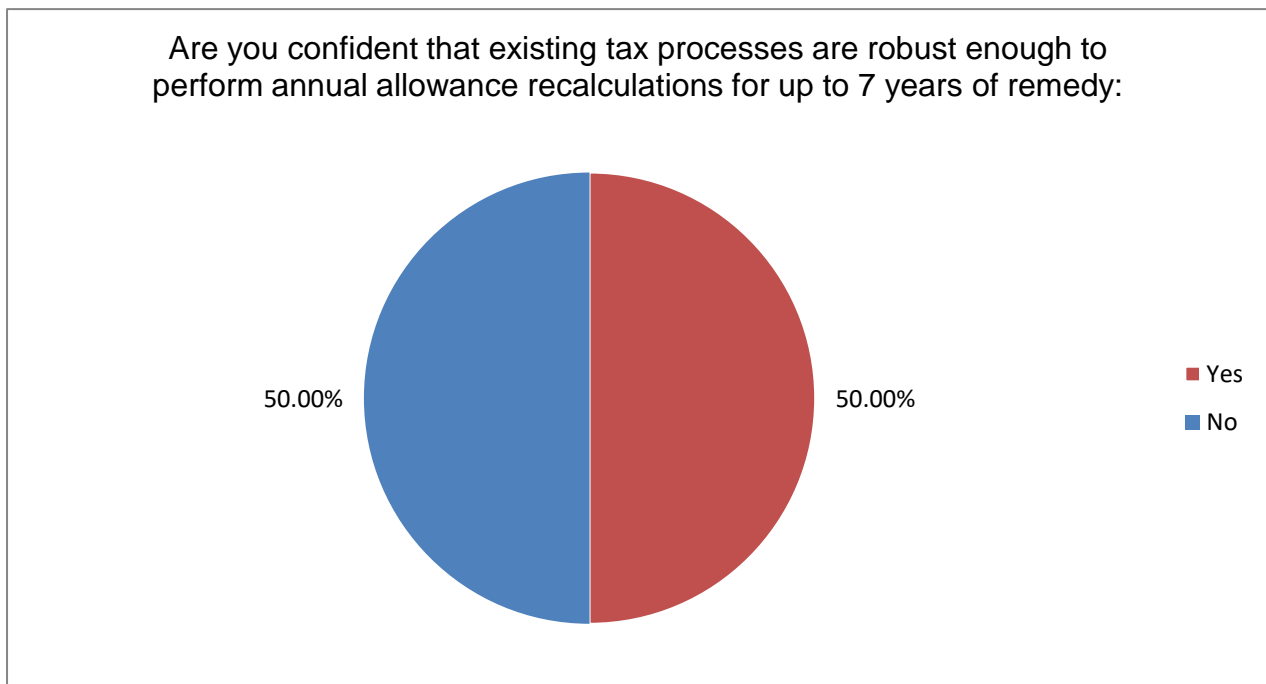
Finally, FRAs were asked to detail any issues that they thought might occur with adjustments of contributions. A wide range of responses were received, and the free-text comments are available at [Annex F](#). Key themes included available resource, lack of guidance, and impact on individual members.

4.3 Processes and impact

4.3.1 Pensions tax adjustments

In addition to tax relief implications, pensions growth will also need to be recalculated for the remedy period which may lead to new breaches of the annual allowance and lifetime allowance tax limits.

When asked whether they are confident that existing tax processes are robust enough to perform annual allowance recalculations for to seven years of remedy, FRAs returned a perfect 50-50 split.



Those that responded negatively were asked to provide details of any changes that would be required to systems or processes. Many FRAs identified that the administrator would be responsible for performing these calculations, so they were unsure as to the level of confidence. Others commented that it was not possible to give an informed response until legislation and guidance is available, which in turn will inform the level of software automation.

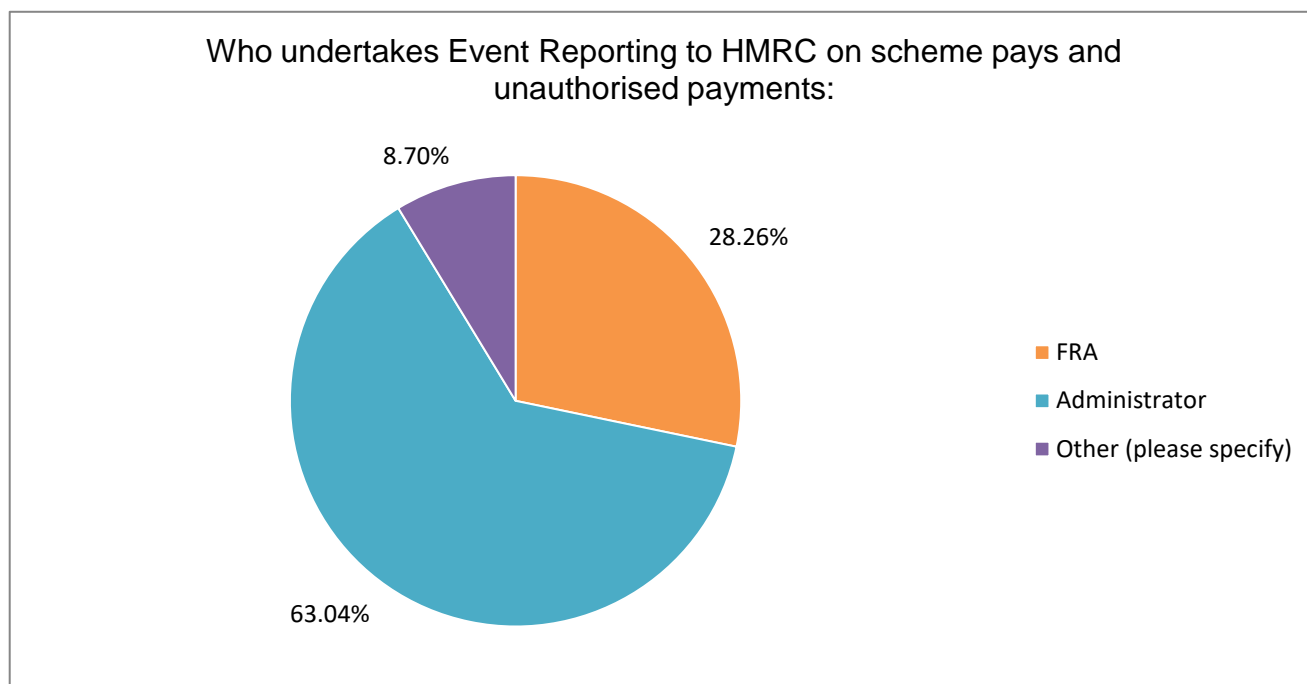
Multiple FRAs noted that the consultation response indicated the government's intent that members would not incur any extraordinary annual allowance charges that they would not have incurred but for remedy and felt that this question suggested this would not be the case.

Paragraph 2.93² confirms that members electing for reformed scheme benefits at retirement will not bear any additional annual allowance charge that is a direct result of them exercising that choice. The question was a genuine enquiry and not intended to suggest anything contrary to the government's position.

² [Public Service Pensions: Government response to consultation](#)

Administrators were also reported to be primarily responsible for Event Reporting to HMRC on Scheme Pays (whereby the scheme pays a tax charge to HMRC on behalf of the member which is then reclaimed as a deduction from annual pension) and unauthorised payments (for example where a lump sum exceeds the permitted tax-free maximum).

It is possible that these types of reportable events may increase as a consequence of remedy implementation.

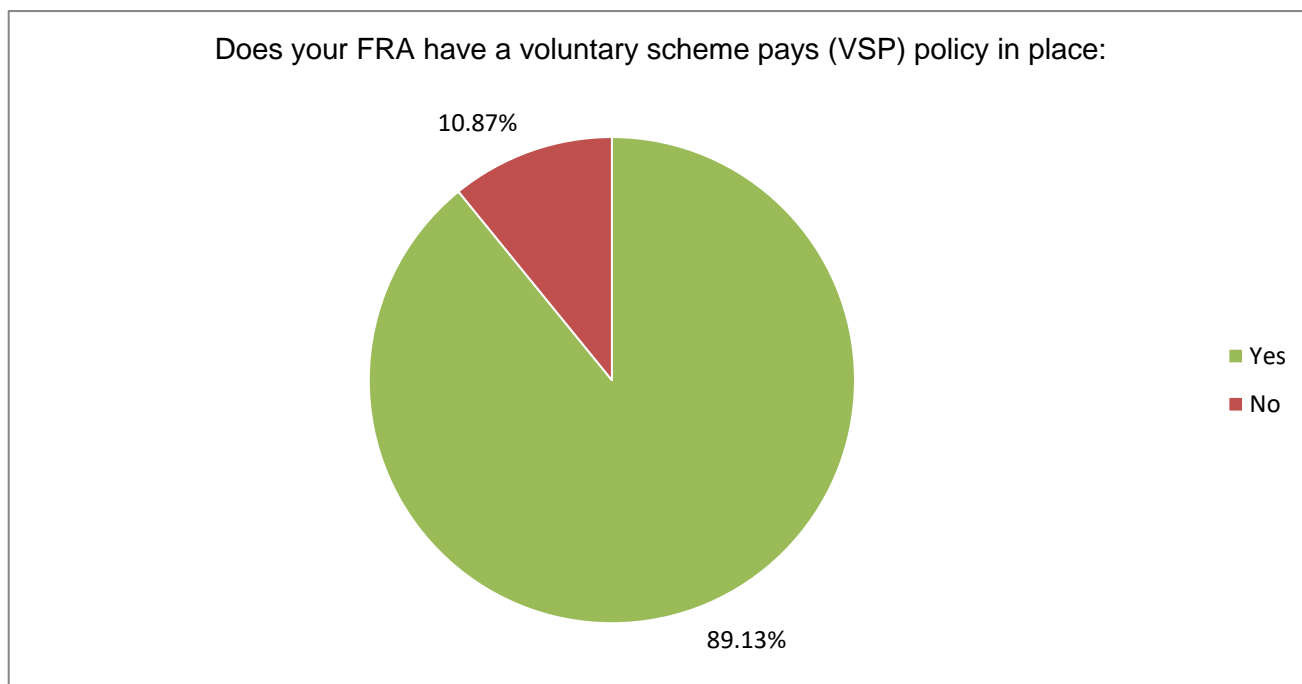


There are [two types of scheme pays arrangements](#): Mandatory Scheme Pays (MSP), which can only apply in certain circumstances, and Voluntary Scheme Pays (VSP) which offers more flexibility.

At the time of the survey, it was only anticipated that VSP would be able to be used by members to settle tax charges following the remedy adjustments, therefore FRAs were asked if they had a VSP policy in place. Eighty-nine per cent have a policy and 11 per cent do not.

On 20 July 2021, [HMRC published a policy paper](#) and [draft regulations proposing to extend the MSP deadline](#) for members whose pension input amount is retrospectively changed. This will allow members whose annual allowance position for a previous tax year has been changed retrospectively to use MSP.

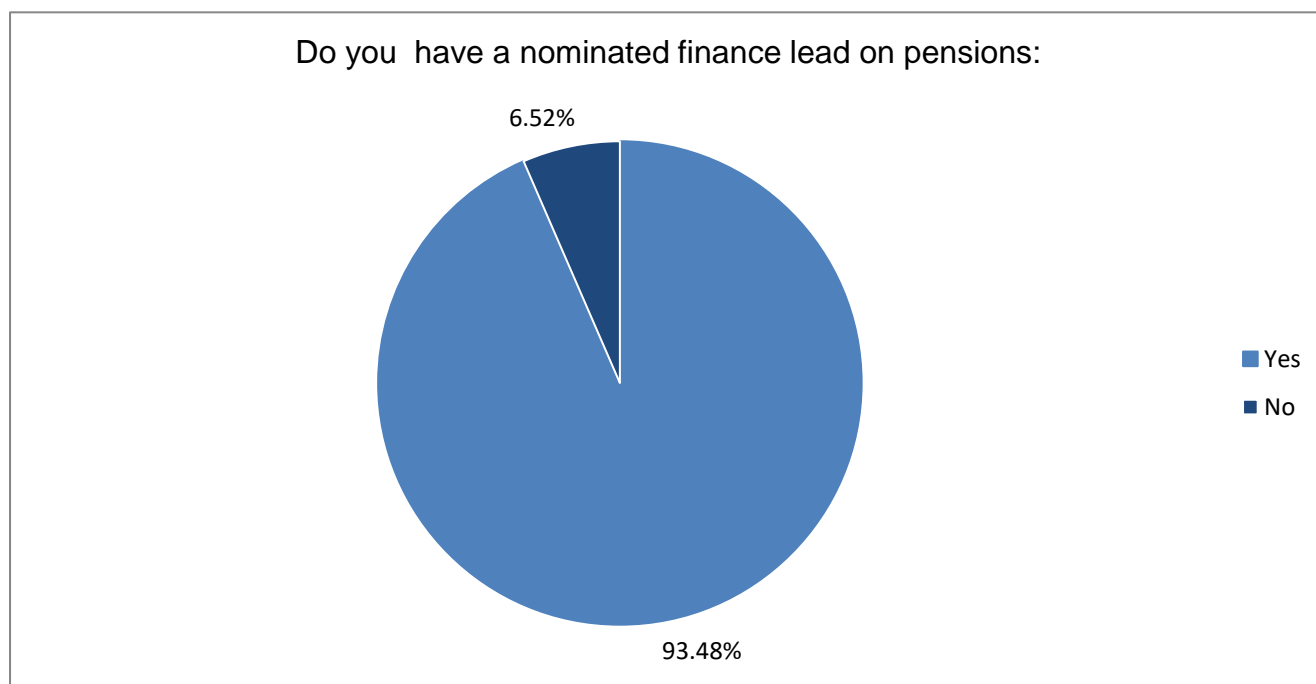
These changes are intended to come into force on 6 April 2022 and be backdated to 6 April 2016.



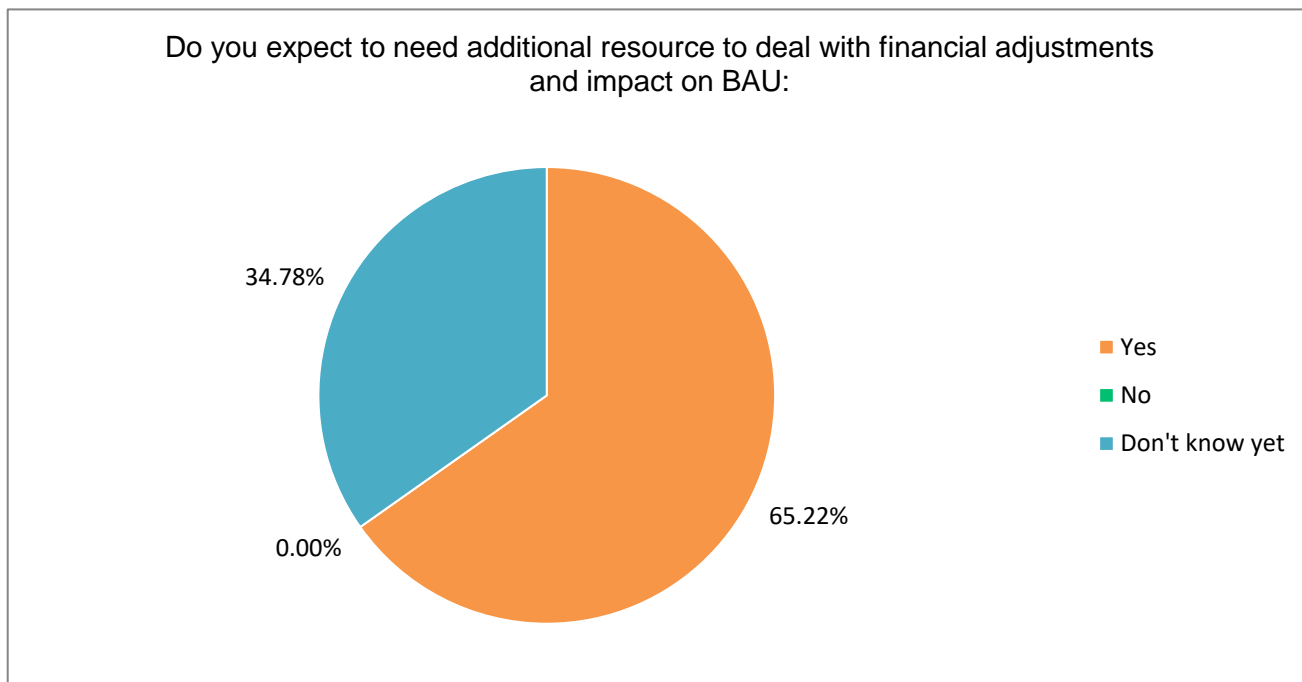
4.3.2 Financial processes

It is expected that financial processes will be impacted by remedy and that there may be associated budgetary costs. The questions in this section relate to an FRAs resources to deal with financial impacts.

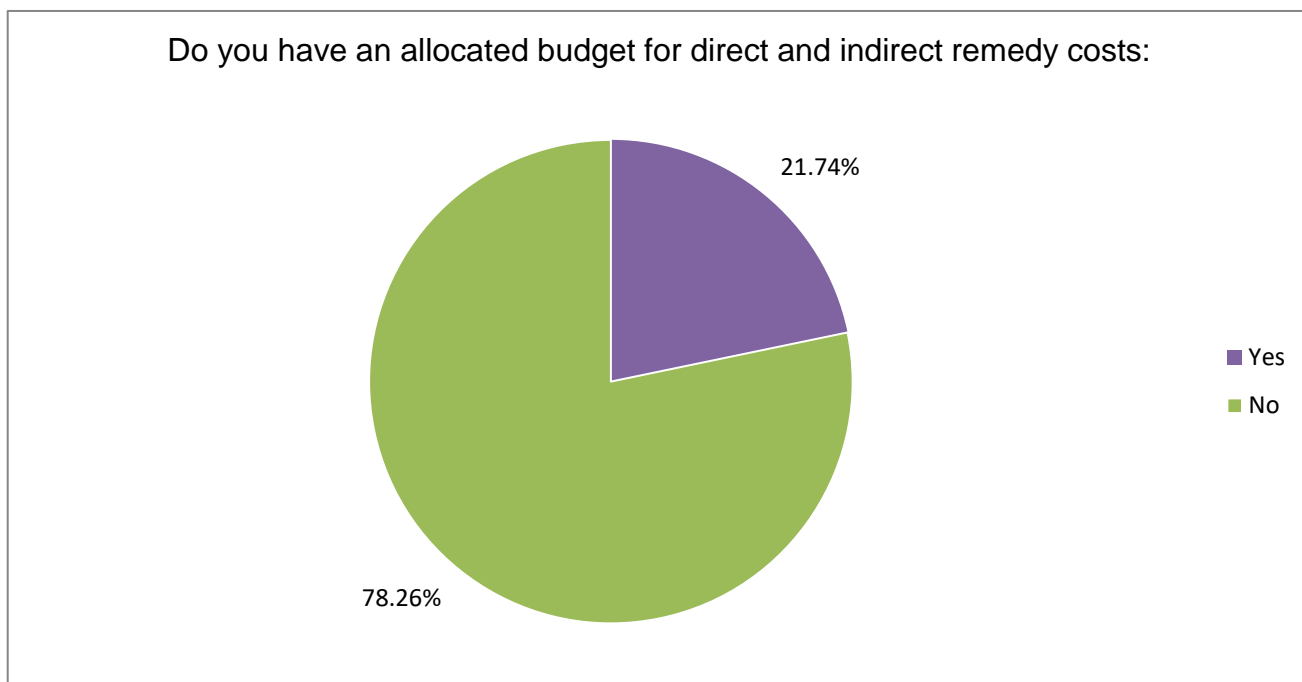
Almost all FRAs (94 per cent) have a nominated finance lead for pensions.



Sixty-five per cent of FRAs expect to need additional resource to deal with financial adjustments and impact on business as usual. Tellingly, the remaining 35 per cent answered “don’t know yet” rather than “no”.



Less than one quarter (22 per cent) of authorities have an allocated budget for direct and indirect remedy costs. Now that we have greater clarity over the requirements and scope of remedy with the introduction of the [Public Service Pensions and Judicial Offices Bill](#), it would be interesting to establish whether this position has changed.



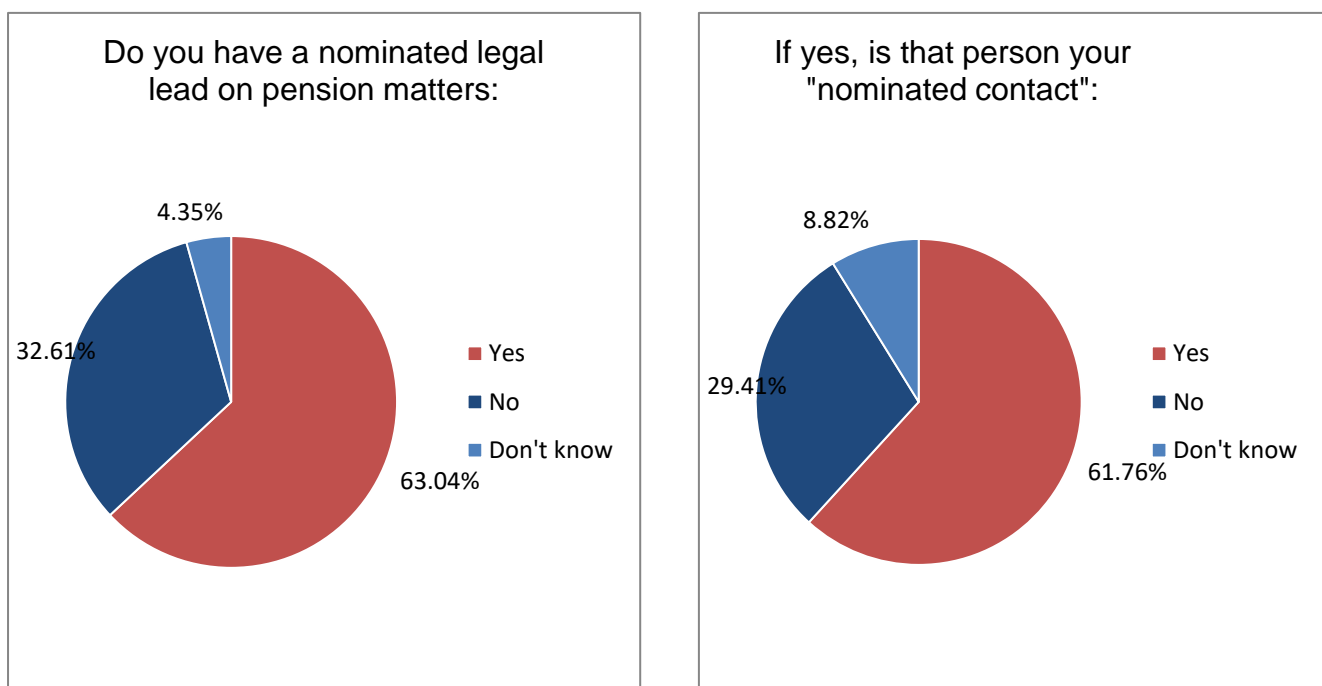
4.3.3 Legal processes

It is likely that FRAs will need legal support on a range of remedy processes such as immediate detriment, reviewing and processing remedy compensation payments, and complex cases (for example divorce, survivor benefits, contingent decisions). FRAs were asked two questions to help us understand whether this support is in place.

Sixty-three per cent have a nominated legal lead for pension matters and in 62 per cent of those cases, that person is the FRA's "nominated contact" for the proceedings in Sargeant that are managed collectively by the LGA.

Unfortunately, no further data or commentary was requested, as it would have been beneficial to understand why the correlation here was not greater. There did not appear to be any pattern to size or type of FRA with a legal lead in place, and there was at least one instance where a negative response was given to the first question, and a positive response to the second.

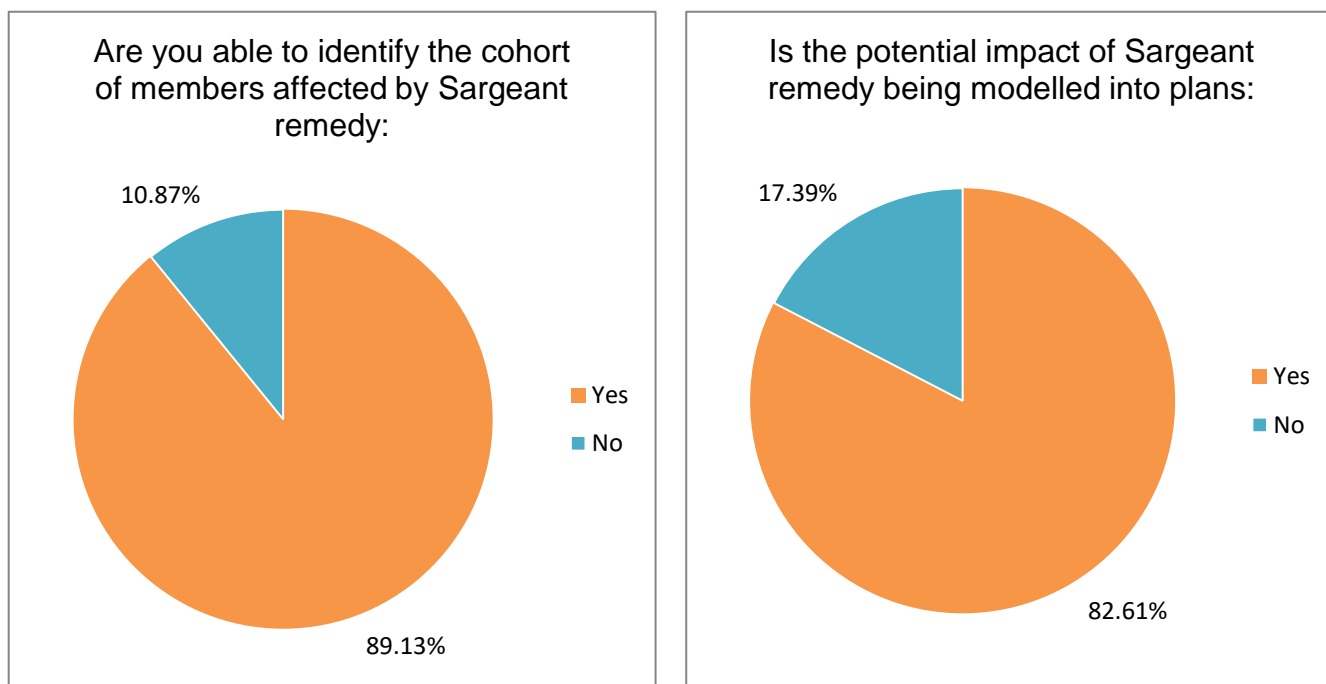
However, FRAs seem broadly to have the legal support that is needed in place.



4.3.4 Workforce planning

As members will have more flexibility over when they retire under remedy, workforce planning may be affected. FRAs were asked if they were prepared for this, firstly by establishing who leads on workforce planning and retention for each authority. While a wide range of free-text responses were received, in almost all instances, the post holder is a member of senior human resources staff or a uniformed equivalent, for example, Area Manager People & Organisational Development. The full list of responses is available at [Annex G](#). Names of specific individuals have been removed.

Eighty-nine per cent of FRAs confirmed that they are able to identify the cohort of members affected by age discrimination remedy and 83 per cent are modelling the potential impact into plans.



From the 35 FRAs who confirmed approximate numbers, the cohort varied from 15 to 4,000 members. There were some inconsistencies in the data provided. For example, one FRA separated out immediate detriment cases, and one only gave the year one figure. However, the variance illustrates the wide-ranging impact of remedy.

4.4 Information, communication, and coordination

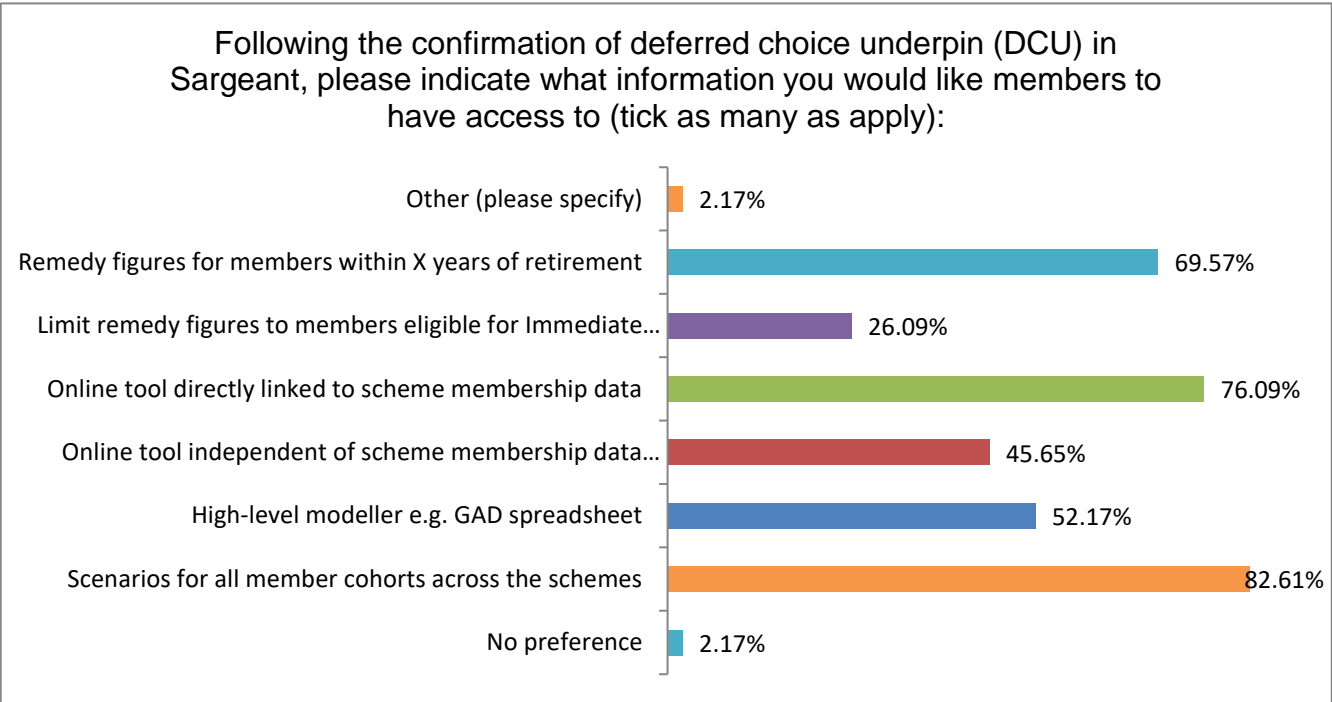
The questions in this section were intended to help us understand what types of communication FRAs would like to see and sought views on the co-ordination of age discrimination remedy across FRAs in England.

Questions were also asked about communications in the first special members options exercise in 2014-15, and how these could be improved.

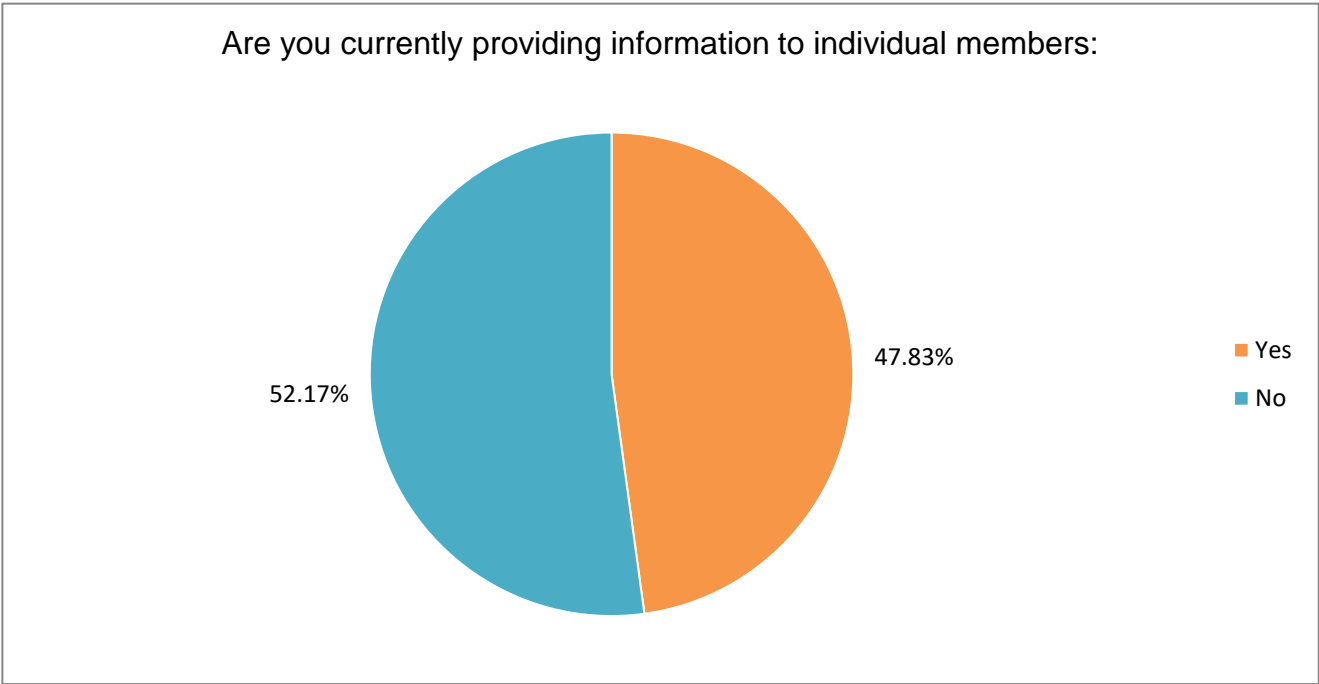
FRAs were invited to indicate from a list of options what information they would like members to have access to in order to understand the impact of remedy. The list was caveated to confirm that it was not a guarantee of delivery of any of the options but was intended to allow us to understand individual FRA preferences when considering budget and resources.

The most popular choices were scenarios for all member cohorts across schemes; an online tool directly linked to scheme membership data (therefore within the pension administration system); and remedy figures for members within a certain number of years of retirement (i.e., estimates of benefits through the pension administration system).

A high-level modeller or online tool which rely on member input were less popular. Under “other”, one FRA suggested that tax implications should be covered. The SAB will consider these preferences.



The percentage of FRAs providing information to individual members is finely balanced. Where information is being provided, this is primarily concerning immediate detriment or is generic information which has been circulated by the LGA or the government ([Annex H](#)).

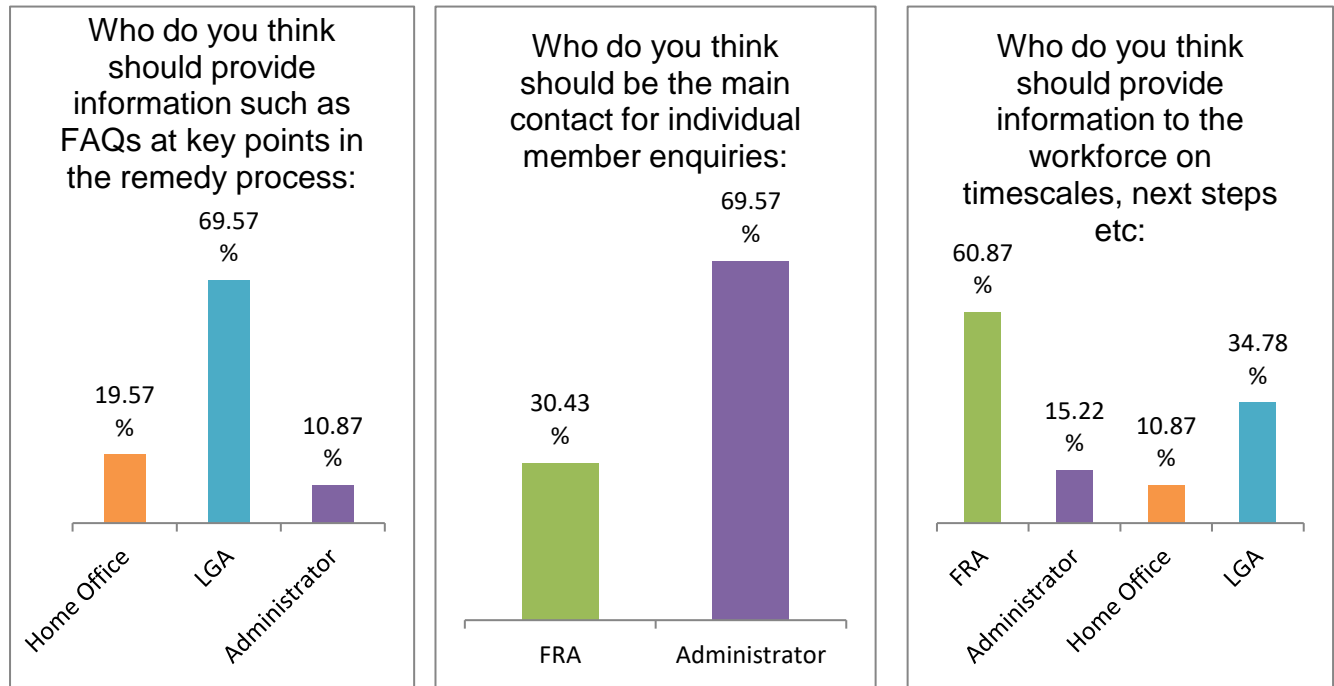


The next three questions asked FRAs for their opinion on who should provide information or deal with queries during the remedy process:

- Seventy per cent thought that the LGA should provide information such as FAQs at key points during the process.
- Seventy per cent thought that the administrator should be the main contact for individual member enquiries.
- Sixty-one per cent thought that the FRA should provide information to the workforce on timescales and next steps, and 35 per cent thought that the LGA should do this.

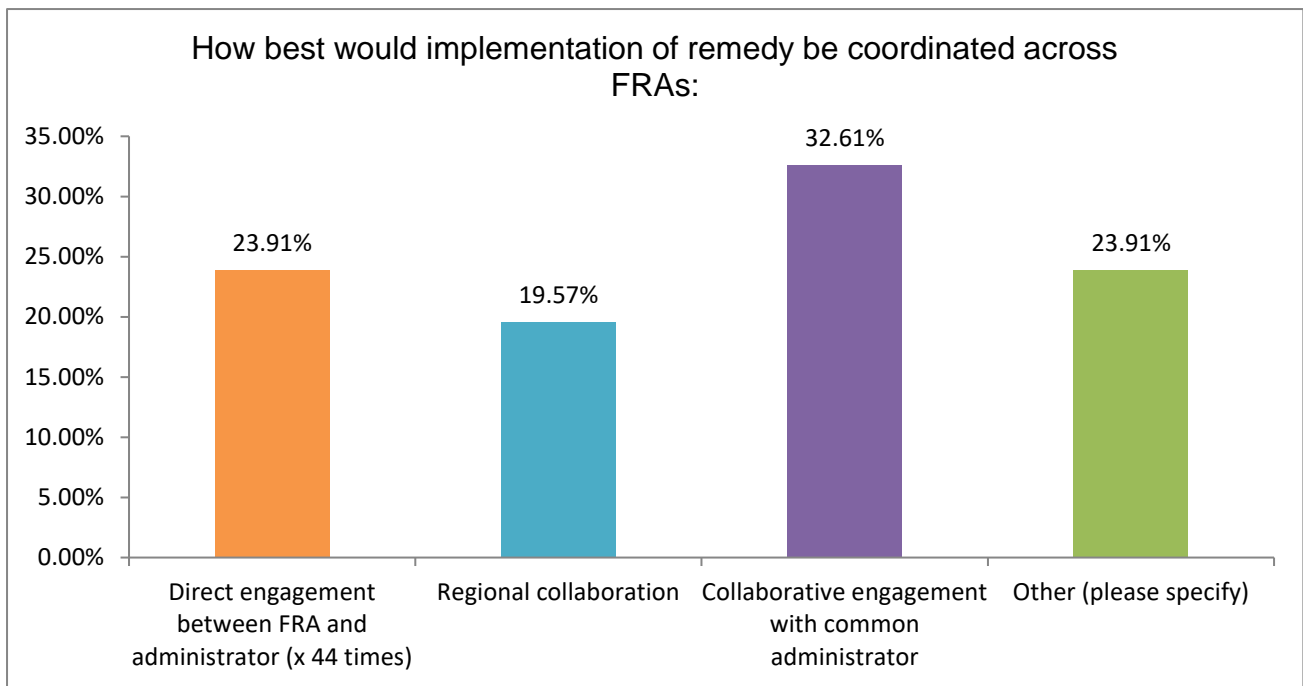
N.B. Percentages add up to more than one hundred, as FRAs could select more than one option.

These outcomes are broadly in line with our expectations and preferences. In terms of providing information to the firefighter workforce, we would anticipate providing this information to FRAs to pass on to their members.



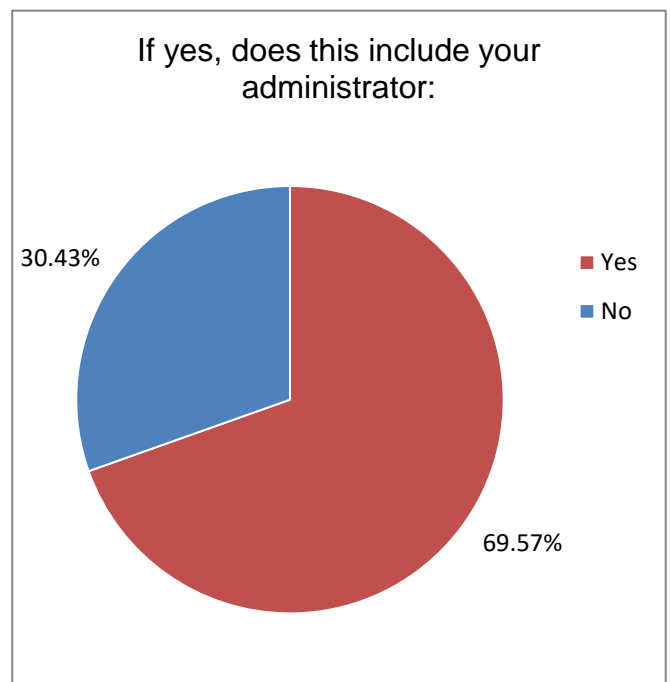
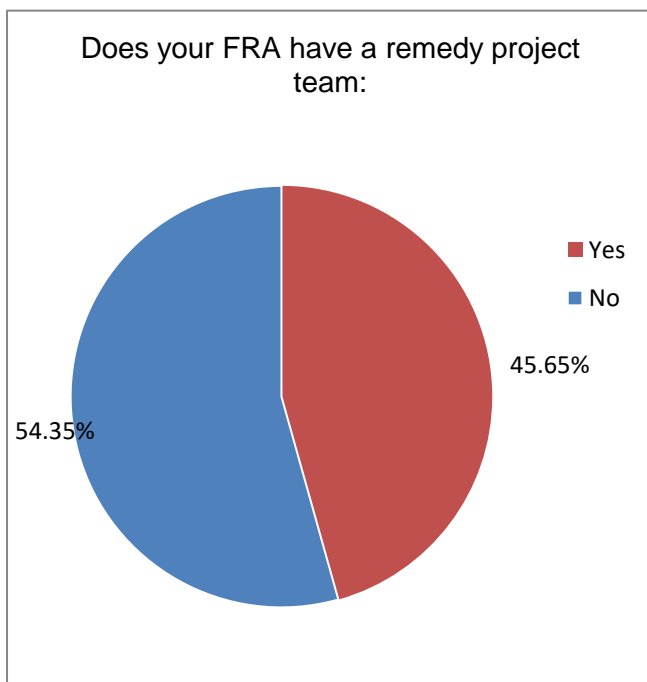
Views on how best remedy would be coordinated across FRAs were mixed. Collaborative engagement with a shared administrator was the slightly preferred option at 33 per cent. However, not all FRAs have a shared administrator and may therefore have selected direct engagement.

Under the “other” response, several FRAs suggested national collaboration or regionally in line with a national framework.



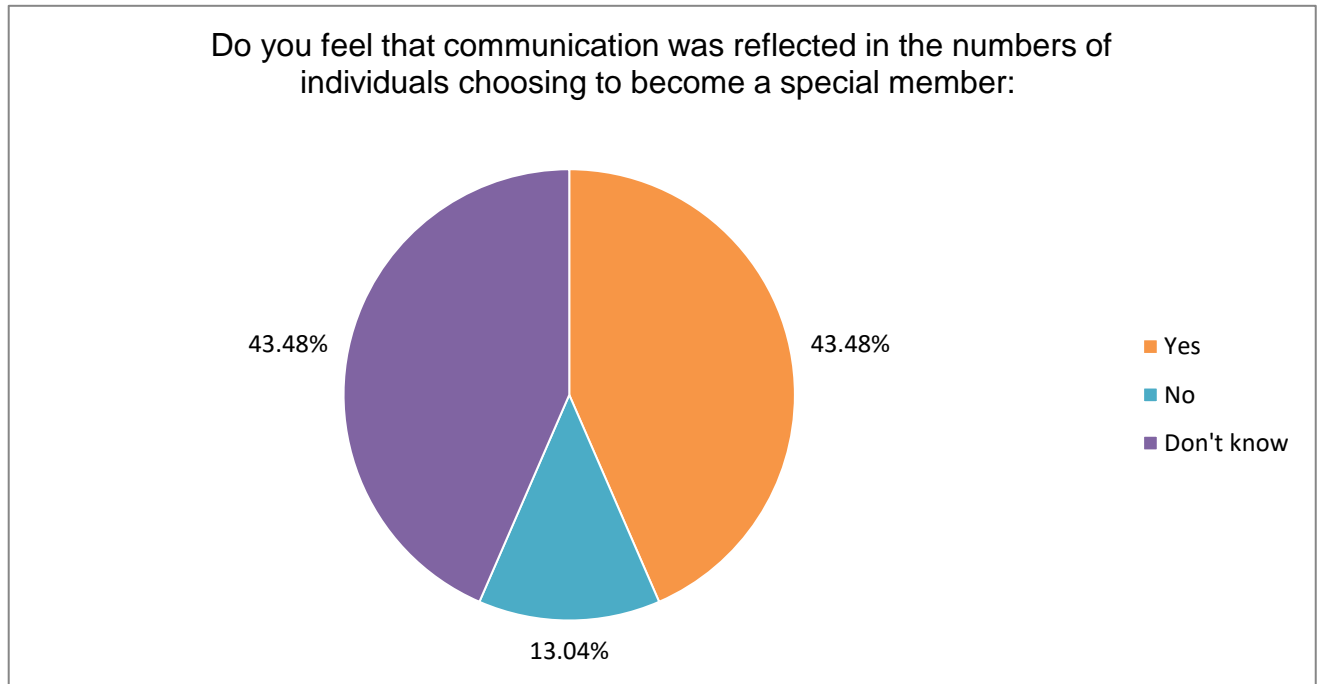
We asked FRAs to confirm whether they have a remedy project team, to facilitate effective implementation, and if so, whether this includes their third-party administrator. Responses to the first question were again fairly balanced, and in a majority of cases the administrator is included.

Comments were invited where the answer to the second question was “no”. Many of these stated that the administrator has a project team, and that the FRA is involved in those groups, rather than the other way around.



Moving on to consider Matthews and the first special members options exercise, FRAs were asked to indicate on a scale of one to ten (with one being the lowest), how well they felt this was communicated in 2014-15. The weighted average response was 5.93.

We were interested to understand whether the level of communication was reflected in the number of individuals choosing to become a special member, as the take up rate was relatively low. The results were inconclusive: 43 per cent agreed, but the same number were unsure; only 13 per cent responded negatively. The question was speculative, and it should also be considered that questionnaires were also submitted in respect of Wales where the deadlines were later.



FRAs were asked to detail any suggestions for improving communications for second options exercise. A wide range of helpful proposals were submitted, and a list of the verbatim responses is available at [Annex I](#). The generated word cloud below illustrates some of the key areas of importance to FRAs.



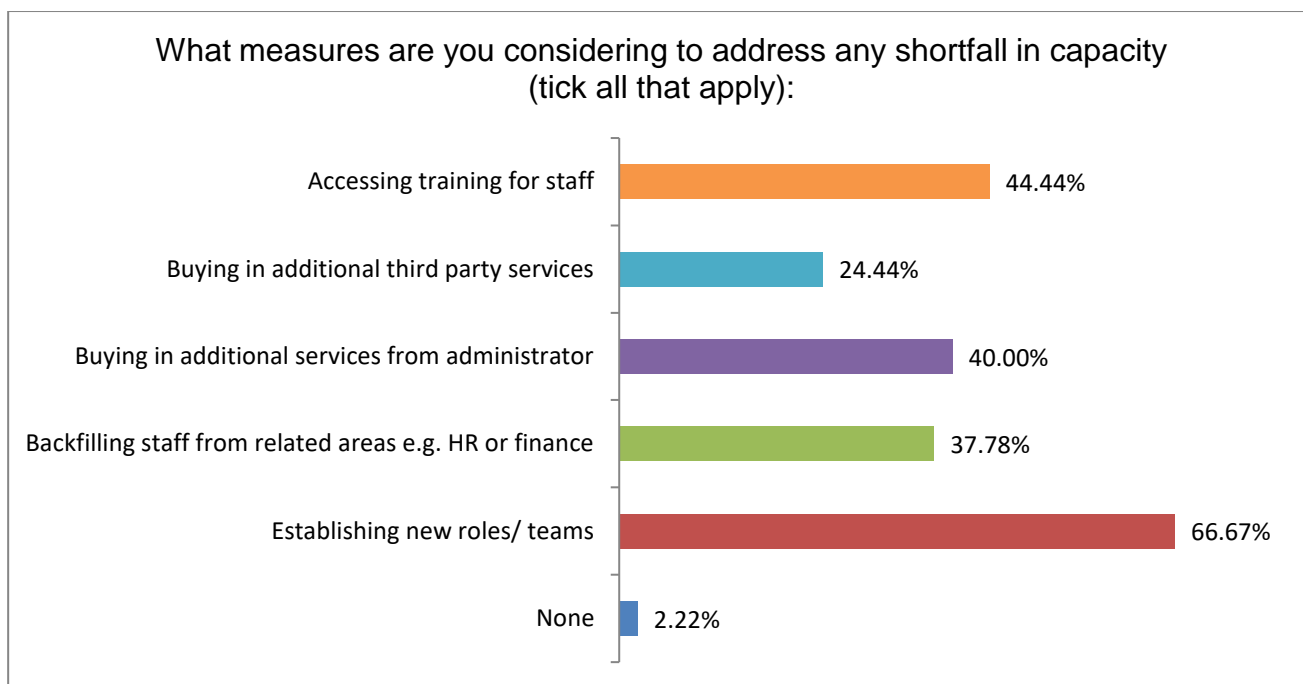
4.5 Knowledge, capability, and capacity

There is likely to be a requirement for an enhanced level of knowledge and resource capacity in Firefighters' pensions over the next three to four years. We asked if FRAs to tell us about any plans in place to address this.

The weighted average level of internal pensions knowledge and capacity within each FRA as indicated on a scale of one to ten (one being the lowest) was 5.67. However, as one respondent commented in the final question, having knowledge does not necessarily mean also having capacity, and these two measures should have been taken separately.

A range of measures were suggested that FRAs might be considering to address any shortfall, with an invitation to tick all that apply. The most popular option was recruiting for additional resource or creating new roles, followed by accessing training for all staff.

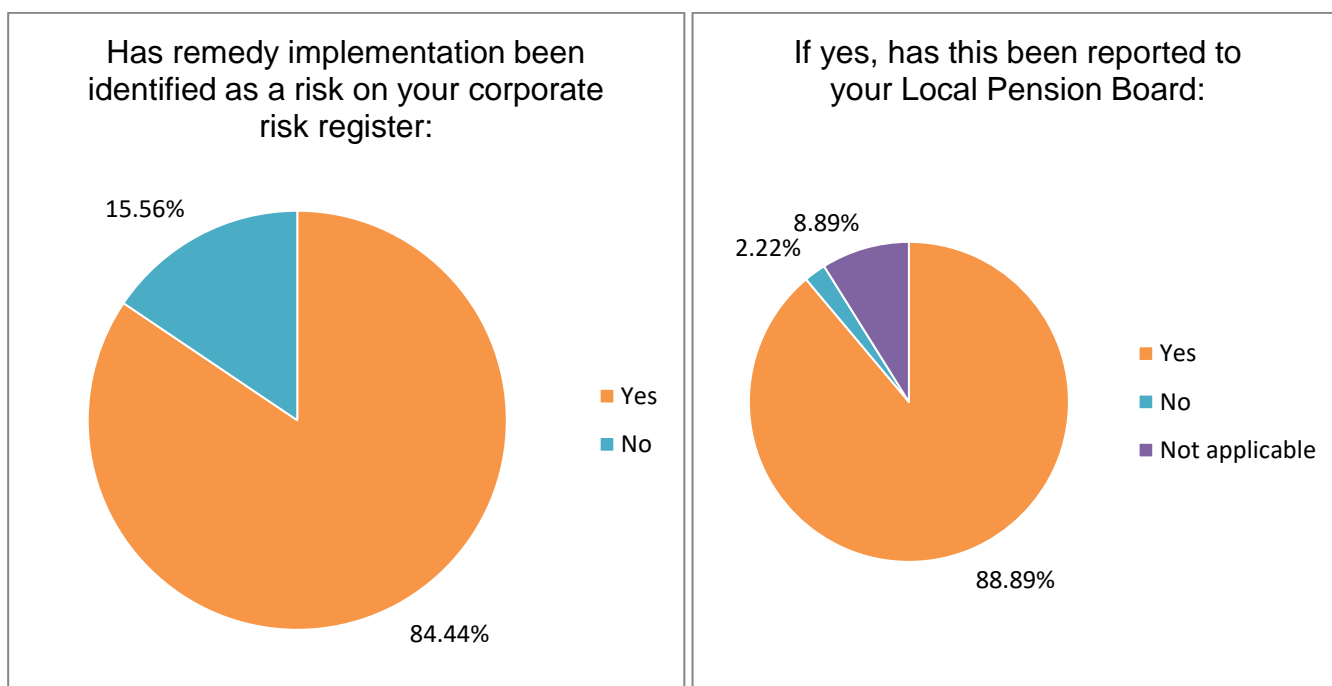
For clarity, the only FRA who indicated that they are not considering any additional measures are generally incorporated into another FRA for all pension-related matters.



Eighty-four per cent of authorities have identified remedy implementation as a risk on their corporate risk register and in the majority of cases this has been reported to the FRA's Local Pension Board (LPB).

The figures are slightly skewed as three FRAs answered "no" to the first question, but "yes" to the second. This is an equally valid response; however, the follow-up question was designed to be answered where the first response was positive, hence the "not applicable" option. Only one FRA has identified the risk but not reported it to the LPB.

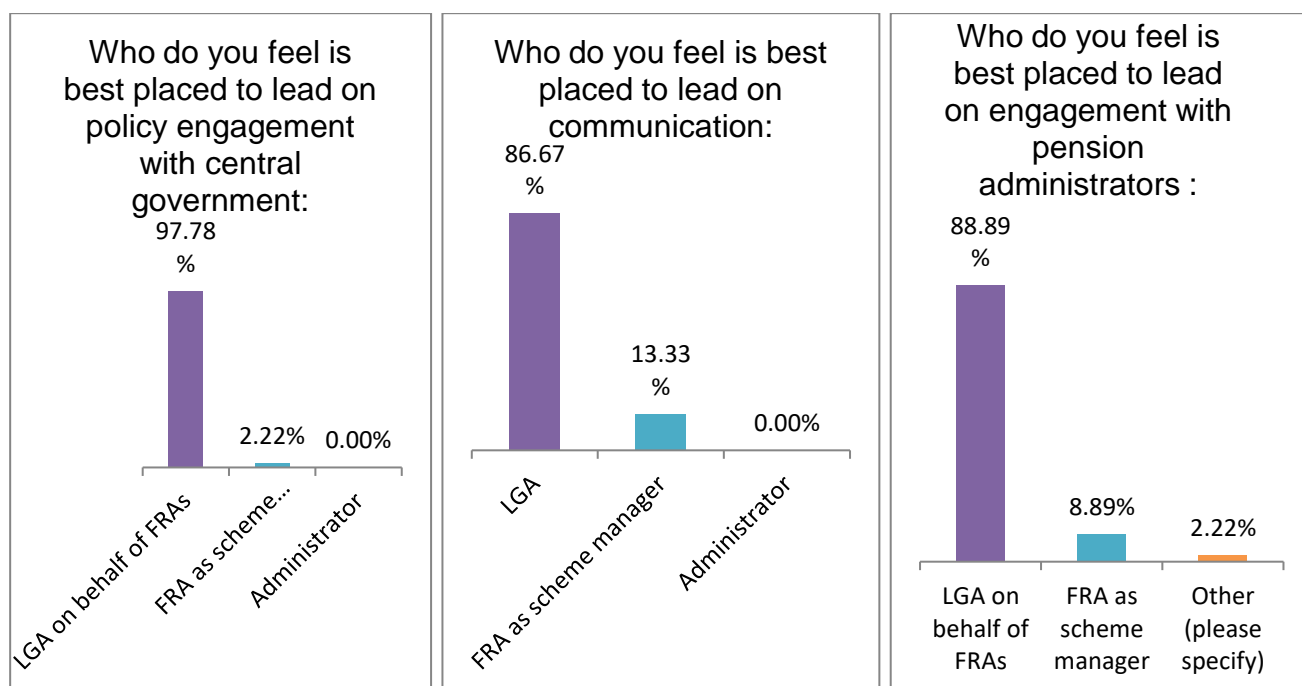
It would have been useful to ask an additional follow-up question to establish why remedy implementation is not considered a corporate risk, where a negative response was given.



A series of three questions was then posed around which organisation or body would be best placed to lead on certain aspects of remedy:

- Ninety-eight per cent of respondents felt that the LGA are best placed to lead on policy engagement with central government on the legislation needed to bring in age discrimination remedy. One FRA noted the LGA should act in association with the SAB.
- Eighty-seven per cent stated that the LGA is best placed to lead on direct service wide communication or provision of content for communication. Thirteen per cent thought this should be carried out by the FRA as scheme manager. Two additional comments suggested that this could be collaboratively undertaken.
- Eighty-nine per cent felt that the LGA is best placed to lead on engagement with pension administrators on implementation, with 9 per cent selecting the FRA as scheme manager. One authority noted that this should be an iterative process with the LGA informing the scheme manager who would then work with their administrator.

The responses to these questions give the LGA the necessary endorsement to lead on remedy related issues on behalf of FRAs and provide assurance that this is the sector's preferred approach.



The final question asked FRAs to rate how useful the survey had been to identify gaps in planning for Sargeant and Matthews, on a scale of one to ten (one being the lowest). The weighted average response was 5.98.

This is perhaps lower than anticipated, however, it could be viewed positively in that FRAs feel that they were already well prepared at the time of completing the survey. The survey outcomes will probably prove more useful, as they will provide a benchmark and allow the LGA and SAB to identify any gaps and how these might be addressed.

Eleven authorities provided additional comments, these are listed below for completeness:

Any final comments:
Undoubtedly resolving both of these issues is going to be challenging in terms of obtaining relevant data and the availability of capacity and knowledge. We would support a centralised / co-ordinated approach that draws on the knowledge and capacity within the LGA and administrators such as West Yorkshire Pension Fund (WYPF).
Progress can only be made when clarity over remedy is known and ideally a cost framework in respect of the additional processing and calculation has been agreed nationally in respect of the pension providers.
some questions do not allow for a split answer between the cases (Q26).
The survey @ Q53 cannot be answered accurately, as we have a reasonably high level of knowledge but very limited capacity to complete the additional work.
Our HR records are held for the lifetime of someone's employment. They are held for 7 years after someone leaves.
Very useful survey, think having these more frequent keeps the main factors and workloads in everyone minds, also to identify areas which you hadn't thought of and no need to look into further.
Confirmed we are aware of, and are planning for the difficulties that lie ahead.
This remains a new piece of work and some of the questions seem to alternate between 2015 and Matthews Case, useful to review our position with the survey. Thanks
Would be interested to know when the analysis of the survey will be shared and how this will inform next steps. Timelines for planning are essential. Communication void needs to be filled although absolutely appreciate the difficulties with this
Funding remains a concern for FRAs. Clarity is needed from Government about where the additional monies will come from i.e. top up grant.
the process is going to be an extremely complex one and the Matthews case is going to a challenge due to the timescales involved, it would be advantageous if as much detail around the process could be developed centrally so that services aren't in the position of having to develop the process in addition to the identification the required information and detail
Our biggest issue is that all the payroll work prior to 01/04/2021 has to be done manually due to the Combined Fire Authority coming into effect. Extracting data from our payroll system and into the format required for the data collection template is going to take some careful thought and planning, Overall, we feel like we are in a good position at this time.

5. Recommendations

The SAB would like to thank all FRAs for their participation in the survey, and for continuing to support the work of the Board.

Overall, the survey has painted a positive picture of the sector's preparedness for remedy in Sargeant and Matthews. The weighted average response for usefulness of the survey in identifying gaps was around six. This suggests that FRAs feel, on balance, relatively prepared.

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Scheme Advisory Board Secretariat

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However, the SAB has expressed concern over some individual responses and will seek a fuller understanding of these submissions in due course. FRAs are reminded that the implementation of remedy is a legislative requirement.

The survey results will allow authorities to benchmark their existing plans and the following section provides recommendations and assurances on actions to address areas of concern.

As the responses to some questions are likely to change as further policy direction and legislation become available, the SAB recommend that an abbreviated version of the survey is carried out at intervals as a temperature check.

5.1 Current arrangements

Sixty per cent of FRAs are covered by two administration providers. Since the survey was launched, the number of administrators offering FPS services has reduced from 16 to 15, with another withdrawing from the market from April 2022.

There is no clear appetite for administration to be centralised and this would not solve the complexity of 44 separate decision makers for the schemes. Authorities seem to be happy with the status quo, or to allow natural attrition until there are a small number of multi-FRA administrators.

The recommendation in this case is to improve routes to administration procurement for FRAs by development of a procurement framework, as exists for the Local Government Pension Scheme. This would allow FRAs to avoid long and complicated procurement processes and will allow greater choice of preferred providers.

5.2 Data

Good progress has been made on identifying data requirements for age discrimination remedy (Sargeant) and this will be further supported by provision of the software data extract and a planned data workshop for administrators. Further clarity on the second FPS 2006 special members options exercise (Matthews) will allow FRAs to progress data considerations and a good framework is in place from the first exercise.

As collection of pay and service data will be particularly complex for Matthews, a recommendation is made for the FPS technical group to establish a set of principles and best practice for cases where data cannot be obtained.

FRAs rightly identified that different processes will need to be put in place for different member cohorts for contribution corrections and the associated tax relief and interest adjustments, and it is evident that clear guidance will be needed. The LGA recommends close monitoring of policy information from central government and provision of accompanying guidance developed by the FPS technical group.

5.3 Processes and impact

Further clarity is required on the policy intent for pensions tax adjustments. As these will primarily be undertaken by scheme administrators, further engagement with administrators will be arranged once the Finance Bill is enacted in April 2022 and requirements are clearer. This should include software suppliers to determine the level of automation that will be possible.

The amendment to legislation to extend the deadlines for Mandatory Scheme Pays is welcomed.

Less than a quarter of FRAs have an allocated budget for direct and indirect remedy costs. The LGA will ensure that robust representations are made to the government for adequate funding to alleviate the financial burden of Sargeant and Matthews. The LGA will work closely with the chair of the Fire Finance Network to monitor remedy costs, particularly in relation to software and administration.

While FRAs broadly seem to have appropriate legal support in place, we know from experience that without prejudice information provided to nominated legal contacts is not always communicated to relevant colleagues within the organisation to allow timely decision making. The LGA Bluelight team will liaise internally with Workforce colleagues to determine whether any improvements can be put in place.

It is encouraging to note that the potential impact of Sargeant is being modelled into workforce planning. A recommendation arising from this is to ensure that individual members receive timely and comprehensive information on remedy for them to make informed choices as to when they wish to retire; for example, a common misconception is that protected members will lose their final salary entitlements if they continue in service past 1 April 2022. Information on remedy will also be added to www.fpsmember.org by the end of October 2021. The Fire Communications Working Group (FCWG) will lead on this work.

5.4 Information, communication, and coordination

Following the indication of preferences for remedy tools, a recommendation is made to start immediate procurement for scenarios for all member cohorts across schemes. The SAB will seek to encourage software suppliers to improve the online member self-service offer and encourage administrators to make this available to FRAs. To avoid duplication of time and monetary resource, it is recommended that a high-level modeller or other online tool independent of membership data is not pursued.

Coordination of remedy should be a collaborative approach between the FRA and their administrator, with national oversight by the LGA. Multi-FRA administrators commonly have client group meetings which can be used for this purpose; centrally the LGA will use the FPS technical group and FCWG to feed into the existing regional fire pension office groups. Each party has a distinct role to play, and each is dependent on the other. Close working relationships will be key, and the SAB recommends that all FRAs and administrators have a remedy project team with a named lead, to ensure effective implementation of both Sargeant and Matthews.

FRAAs made a large number of helpful suggestions to improve communications for the second options exercise in Matthews and these will be considered in detail by the FCWG.

5.5 Knowledge, capacity, and capability

On average, FRAAs rated internal pension knowledge and capacity at 5.67. Common measures to address shortfall were additional recruitment and accessing training. The LGA has committed in the age discrimination remedy Project Implement Document to consider training needs and how these can best be met. This will be taken forward as an action from the survey. Implementing remedy will provide an excellent opportunity for upskilling and developing knowledge, as well as promoting engagement with pensions.

Risk appears to have been reflected at an appropriate level and governance training will be provided to LPBs allow them to successfully scrutinise and monitor local delivery of remedy.

The sector has provided the necessary assurance on preferred approach for the LGA to lead on policy engagement, communications, and engagement with administrators. The LGA and SAB thank FRAAs for their endorsement and continued support.

Annex A: FRAs in England and Wales

Avon Fire and Rescue Service	Leicestershire Fire and Rescue Service
Bedfordshire & Luton Fire and Rescue Service	Lincolnshire Fire and Rescue Service
Buckinghamshire & Milton Keynes Fire & Rescue Service	London Fire Brigade
Cambridgeshire Fire and Rescue Service	Merseyside Fire and Rescue Service
Cheshire Fire and Rescue Service	Mid and West Wales Fire and Rescue Service
Cleveland Fire Brigade	Norfolk Fire and Rescue Service
Cornwall Fire and Rescue Service	Northamptonshire Fire and Rescue Service
Cumbria Fire and Rescue Service	Northumberland Fire and Rescue Service
Derbyshire Fire and Rescue Service	North Wales Fire and Rescue Service
Devon & Somerset Fire and Rescue Service	North Yorkshire Fire and Rescue Service
Dorset & Wiltshire Fire and Rescue Service	Nottinghamshire Fire and Rescue Service
Durham & Darlington Fire & Rescue Service	Oxfordshire Fire and Rescue Service
East Sussex Fire and Rescue Service	Royal Berkshire Fire and Rescue Service
Essex County Fire and Rescue Service	Shropshire Fire and Rescue Service
Gloucestershire Fire and Rescue Service	South Wales Fire and Rescue Service
Greater Manchester Fire and Rescue Service	South Yorkshire Fire and Rescue Service
Hampshire & IOW Fire and Rescue Service	Staffordshire Fire and Rescue Service
Hereford & Worcester Fire and Rescue Service	Suffolk Fire and Rescue Service
Hertfordshire Fire and Rescue Service	Surrey Fire and Rescue Service
Humberside Fire Brigade	Tyne & Wear Fire and Rescue Service
Isle of Scilly Fire Brigade	Warwickshire Fire and Rescue Service
Kent Fire Brigade	West Midlands Fire Service
Lancashire Fire and Rescue Service	West Sussex Fire and Rescue Service
	West Yorkshire Fire and Rescue Service

Annex B: What position within your FRA oversees delivery of pension administration:

Accountant People Services
 Assistant Chief Fire Officer
 Assistant Chief Fire Officer Corporate Services
 Assistant Director of Finance
 Assistant Director, HR & Learning
 Chief Executive of the Fire and Rescue Service
 Chief Finance Officer
 Chief Fire Officer
 DCFO as Scheme Manager although day to day is carried out by Director of Finance & Procurement
 Deputy Chief Fire Officer
 Deputy Chief Fire Officer
 Deputy Section 151 Officer
 Director of Corporate Services
 Director of Finance and Assets
 Director of Finance, Assets & Resources
 Director of People and Development
 finance
 Finance Manager
 Finance Officer
 Head of Data, Digital and Specialist Projects
 Head of Finance
 Head of Finance - Pensions, Treasury & VAT
 Head of HR
 Head of HR and Learning and Development and Head of Finance and Procurement

Head of HR/ Head of Finance
 Head of Human Resources
 Head of People Services - Joint Police/Fire team
 Head of Resource Management, Payroll & Pension Groups
 HR Rewards & Benefits Manager
 HR Services Manager in County Council
 No official post, jointly via Finance & Compliance Manager and Scheme Manager, HR
 Payroll & Pensions Manager
 Payroll & Pensions Manager
 Payroll and Pension Manager
 Payrolls and Pensions Manager
 Pension Fund Committee
 Pension Manager
 Pension Officer
 Pensions / Payroll & HR Intelligence Manager
 Pensions Manager
 Pensions Manager
 Pensions Officer
 Pensions Remedy Advisor (new post currently vacant)
 Principal Pensions Consultant
 Procurement Manager with lead responsibility for pension administration
 Scheme Manager
 Senior Manager - People Management

Annex C: Who line manages that post-holder:

Area Manager Business Support
 Assistant Chief Fire Officer
 Assistant Chief Officer
 Assistant Director - Finance
 Assistant Director - People Services
 Assistant Director - Workforce
 Assistant Director - Workforce Operations
 CFO line manages the Finance & Compliance Manager
 CFO/CE
 Chief Executive
 Chief Executive (Head of Paid Service)
 Chief Fire Officer
 Chief Fire Officer
 Chief Fire Officer
 Chief Fire Officer
 Chief Fire Officer
 Chief Fire Officer
 Chief Fire Officer
 Chief Fire Officer
 Chief Fire Officer
 Chief Fire Officer as Scheme Manager
 chief officer
 Corporate HR Manager
 County Council member

Deputy Chief Fire Officer
 Deputy Chief Fire Officer
 Director of Corporate Services
 Director of People Services
 Director, Finance and Corporate Services
 Financial Services Manager
 Financial Services Manager
 Fire Authority (via normal Director /CFO structure)
 Head of Employment Policy and Practise
 Head of Finance
 Head of Financial Services
 Head of HR
 Head of HR in County Council
 Head of HR/ACO People Services
 Head of Human Resources
 LGPS Pension Fund Investment Manager but I reports into
 Chief Fire Officer for Fire
 N/A
 NA
 Payroll and Pensions Manager
 Section 151 Officer
 Senior Head of People/ Assistant Chief Fire Officer
 Strategic Enabler for Finance and Resources
 Treasurer

Annex D: What position within your FRA will lead on remedy data for both cases:

Accountant (People Services)
 ACFO
 Area Manager Business Support
 Assistant Chief Fire Officer
 Chief Finance Officer
 Deputy Chief Fire Officer
 Deputy S151 Officer for Sargeant, it is unclear at this stage who will lead for Matthews
 Director of Corporate Services with support from Pensions Advisor and HR Manager
 Director of Finance & Procurement
 Finance Officer
 Head of Finance
 Head of HR
 Head of HR
 Head of HR
 Head of People Services
 Head of Resource Management, Payroll & Pension Groups
 HR Business Partner
 HR Business Partner
 HR Manager, Strategy & Reward
 HR Rewards & Benefits Manager
 HR team via Head of HR and Learning and Development
 Human Resources
 Human Resources Business Partner
 In process of recruiting pensions officer
 Lead not yet identified
 None as the administration and remedies will be with XPS
 Payroll & Pensions Manager

Payroll & Pensions Manager
 Payroll and Pensions Manager
 Payroll and Pensions Manager
 Payroll Manager
 Pension Manager
 Pension Officer
 Pension Remedy Manager
 Pensions / Payroll & HR Intelligence Manager
 Pensions Admin Delivery Lead
 Pensions Manager
 Pensions Manager
 Pensions Officer
 Pensions Officer (once position recruited to)
 Pensions Remedy Advisor (currently vacant)
 Pensions Services and Fire and Rescue Management Team
 Principal Pensions Consultant
 Procurement Manager with Lead responsibilities for Pensions
 Scheme Manager -delegated to officers
 Senior Advisor - Pensions

Annex E: Please detail any problems you can foresee obtaining pay data for the following: Sargeant

Changed payroll area for PAYE. Members effectively have a record from 2007 to 2015 and then new records from 2017 onwards. complexity and volume of data analysis required.

Coordinating data from numerous sources and systems

Creating alternative Schedules of Contributions - CARE vs FS.

Data held on current and legacy payroll systems

Data should be available

Data will need to be extracted from a combination of HR and payroll systems although complex will be achievable

Few issues anticipated

Had new pay system in 2015 which resulted in pay errors until 2018. These were corrected outside of the system identifying temp promotions and differences in pensionable pay between schemes

N/A - All data accessible via Kirklees SAP

No issues

No issues all pay data held on record

No issues foreseen

No problems

no problems foreseen

none but it will be time consuming

none other than time to resource

Payroll data in different systems. Difficult to extract.

Payroll System has been archived. Extremely time consuming to recreate data per member

Prior to 1996 information could be problematic as prior to this this was held with Cleveland County Council who are no longer in existence

Some data in legacy system

Time, accuracy of pulling information from various sources together, rely on payroll provider for assistance may create time pressures

We are implementing new payroll system, so unclear yet as to how to access this data

We believe we can retrieve the data needed back to 2015

We do not envisage problems
We have some records from 2000 onwards which may be incomplete
We hold the data in payroll, so there should be minimal impact other than resource
Working Group Established to secure data

Annex E continued: Please detail any problems you can foresee obtaining pay data for the following: Matthews

Accessing data from legacy systems, old servers

Accessing records back to 1970 not feasible. May be difficulties in identifying and verifying all eligible members.

as above plus pay information for on-call maybe more difficult to analyse, retention schedule may mean employment records more difficult to work through, locating leavers and communications with members/leavers

Breakdown of pay and who is in scope, few historical records

Challenging and complex - not all records held

data and records not available prior 1/4/2013

Data held on current and legacy payroll systems. Additionally we do not hold salary information prior to 2000

Data may only be available on hard copy files, which may be incomplete

Depending on the scope we would have major issues with the data pre-2011

do not have pay data going back that far

Extract will be more complex due to payroll and HR System changes, full information may not be available

Insufficient historical data

lack of pay records prior to 1995

Lack of payroll data pre-2015

Likely to be some retrieval issues as data only easily available as of 1995

Limited information held digitally prior to 2002

No info prior to the year 2000

Only complete data going back 10 years although incomplete going back to 2007/08

Only current employee records go back to 2006, leavers only to 2015

Only have pay data back to 1999

Our data does not go back far enough, so will be reliant upon guidance as to how to proceed

pay and employment records not being available

Pay data held only goes back to 2005

Pay data may not be available prior to 2000

Pay data would need to be obtained from ledger records

Potentially not being able to obtain legacy data prior to 1999 to support calculations based on actual pay.

Pre 1997 no records held

pre2004 may not be available or very resource intensive to gather as held on microfiche
 Prior to 1996 information could be problematic as prior to this this was held with Cleveland County Council who are no longer in existence
 Records do not exist, or are patchy, going that far back
 Records held by BFRS do not go back far enough. We will be reliant on data held by our pension administrators. Change to payroll provider/pensions administrator over the reference period may highlight gaps in data or accuracy of records
 Some records from 1999 some records incomplete, both due to rules governing historical data and are being removed/destroyed (now on hold)
 Suspect Payroll data will not be available
 Timeframe dependent
 Unsure if data will be available due to extended time period.
 We are implementing new payroll system, so unclear yet as to how to access this data
 We do not have sufficient pay data or employment history for staff who transferred to DSFRS as part of combination with Somerset
 We have microfiche records for payroll in the 1990's may struggle with pre 1990 data
 will be difficult as no data
 Yes - payroll and employment data
 Yes as actual pay data prior to 2000 is not available

Annex F: Please detail any issues you think might occur with adjustments of contributions:

18-20 contribution holiday entitlements.

Adjustments for CPD in the 2015 as not pensionable.

Affordability for individual, creation of repayment plans adding to administrative burden over time, getting monies from individuals, pressure to make payments quickly, disputes, tax issues

APB temp promotions

Beneficiaries who have died impact re widows

Calculation of Pay that could now be pensionable

change in payroll system within period means that EYU cannot be completed online and correspondence with HMRC becomes more time consuming.

Changes to members personal circumstances eg divorce, widowed etc complexity

Complexity and accuracy of contributions. Taxation queries from leavers and unauthorised payment queries. Annual allowance queries.

Consideration for temporary promotions in the 2015 scheme which are not currently pensionable.

Converting membership

data collection

Delays in settling cases.

Differences between 1992, 2006/2006 Modified and 2015 FPS mean data gathering is complex and prone to error

Different allowances are pensionable in CARE scheme and not in final salary so will need to be manually calculated

Different percentage rates for different years.

Due to volumes and our payroll system being quite manual there may be a risk of incorrect calculations being made due to the amount of manual intervention that may need to be applied. Although, we do need to know about the detail regarding the calculations before seeing how much of a risk this will be

Ensuring calculations are correct, communication with members, members unhappy with having to make additional contributions and ensuring that interest is applied correctly if applicable.

Hardship cases - guidance needed on how to apply a consistent approach.

Having the capacity to apply and calculate, dealing with under/over payments, reconciling correct for pension returns, timeline of repayments and potential debtors for financial accounts.

Identifying breakdown of contributions made. Assumptions still required regarding interest rates that need to be applied.

If members not satisfied by IDRPs determinations, TPR and TPO may become involved, again leading to FRA resources being overwhelmed

If Remedy includes a calculator from GAD, which is complex, there's a risk of misinterpreting what's required, keying errors

If taken through Payroll the member will only get the tax relief on the code in operation at the time. Need guidance on how to manage adjustment for the entire remedy period. This is very complex and FRAs will need focussed support and guidance from HMRC. Cannot be left to FRA to sort out.

Incomplete Payroll/HR records – Scheme Manager is unaware of the nature of any issues until the detailed work is under way

Issues around the correct tax treatment. Refunds not paying tax outside 4 years. System will automatically seek to recover tax lack of working model eg a calculator showing amount which should have been paid which would allow the working out of the difference to what has actually been paid

Legal challenges and disputes from Rep Bodies.

Manual calculations required - prone to errors

Members likely to query data, IDRPs process may be used by many members (rather than less than one per annum on average, as currently) leading to FRA resources being overwhelmed

Members will be required to opt for legacy benefits, with the default being to stay in the 2015 Scheme for non-responders: how will the FRA evidence that it has made reasonable efforts to contact a member?

need further information on the collection methods, Collection via PAYE for existing employees shouldn't be an issue but from those employees that have left will be more complex especially with regard to the taxation issues, as per the special members exercise previously undertaken

No contribution overpayments for 2016 Claimants

No issues if guidance is adequate

Other than resource, if there is clear guidance on how this should take place then I don't see any issues.

Payroll systems changes and Payroll/HR/FRS personnel changes over the last 7 years leading to judgments being required to gather the data

Reliance on a small number of key staff (within FRA and Administrator), with significant key man risk

Resources

Resourcing issue – need more discussions with Pensions administrator to see how this will work.

risk of error

Some active members may not be able to pay backdated contributions through payroll which means they may have to wait for the government process to be put in place to claim compensation for tax relief.

Split pension issue

Support will be required to calculate historical cases.

tax implications

tax issues for non-active members, claiming back tax or being taxed for receiving unauthorised payments for contribution holidays.
Tax relief for past years, sufficient pay if we choose to deduct from final pay, annual allowance are we going to recalculate year on year, Schemes pays and timing of this

Tax relief for retired members, payment of contributions in advance of legacy pension payments?

Tax relief, contributions holidays, CETVs, scheme pays, annual allowances, added years contributions.

Tax relief, refunds or additional payments. Payment holiday.

The Combined FRA came into effect 01/04/2021, any adjustment / calculation needed prior to this for contributions will have to be done manually

This will be dependant on guidance and tools provided from LGA

Time consuming for small teams making calculation times lengthy.

Time consuming to gather the payroll data, communicate with members, trace members where necessary, agree repayment terms, chase and track payments, liaise with administrator to ensure a member's pension is increased only after contributions due from him/her have been recovered

unknown until we know more about it

Unsure yet until receive further guidance

updating systems

wait to be advised as many issues known!

What could be a significant cost of administering implementation of Sargeant Remedy will be borne by the FRA

Whole process, from data gathering to collecting all contributions due will span years, rather than months, and any delays will have knock-on effects

will need to have separate process for leavers and will need further guidance from government before agreeing final processes

With regard to Question 26 we do not envisage being able to accurately obtain/backdate contribution data for Matthews

Annex G: Who leads on workforce planning and retention for your FRA:

Accountant (People Services)
 ACFO
 ACFO Service Delivery Support
 ACO Organisation Development
 Area Manager People & Organisational Development
 Assistant Chief Executive, People, Values and Culture
 Assistant Chief Fire Officer
 Assistant Chief Fire Officer Strategy, Planning and Resources
 Assistant Director - People Services
 Chief Employment Service Officer
 Corporate Management Team through an bi-monthly meeting
 DCFO
 Dedicated Group Manager & HR Business Partner
 Deputy Chief Fire Officer
 Director of People and Development
 Fire & Rescue Service
 Fire HR Business Partner
 Head of HR
 Head of HR
 Head of Organisational Development & Transformation
 Head of People and Organisational Development
 Head of People and Organisational Development (HR)
 Head of Resource Management, Payroll and Pension Groups

HR
 HR and Employment Team
 HR and Resourcing and Development (through Head of HR and Learning and Development)
 HR Business Partner
 HR Workforce Planning Manager
 Human Resources
 Human Resources
 Human Resources
 Human Resources
 Human Resources
 Human Resources/ Organisational Development
 People Management
 People Organisational Development (HR)
 People Services Department
 Resourcing Manager (HR Department)
 Shared Services HR
 Strategic Enabler People
 Strategic People and OD Lead
 Talent & Resourcing Manager
 Workforce Improvement Manager

Annex H: Are you currently providing information to individual members (detailed responses):

Communicating information provided by LGA or Welsh Government.

Communication sheets as required

Estimates up to 31 March 2022. Let's talk event held with employees.

For immediate detriment only

for members who meet the criteria for immediate detriment, benefits based on both options Legacy and mixed benefit.

For those under Immediate Detriment, at the point the retirement paperwork is sent, figures for remedy are included

General Queries; members seeking to retire early (rule of 75) by 31.03.2022 to avoid going into CARE. Explaining 1992 benefits will not be lost/frozen until 60.

However the information provided is general data and not specific to the individual.

ID cases only - in the order of retirement and on an individual basis as required

Immediate Detriment figures provided at the point of retirement. No estimates prior to that. Otherwise just general comms

Information has been provided to those who have requested and thinking of imminent retirement, but is heavily caveated as based on information available at the time and may be subject to change

LGA bulletins and regular staff updates (internal Comms)

Member briefings in place

Signposting.

To Immediate Detriment cases approaching retirement

We are communicating in line with LGA guidance and, having taken the decision to proceed with immediate detriment cases, around ID.

We are providing factsheets etc supplied from LGA but not individual quotes based on remedy or ID, we are adhering to current scheme rules at this point in time.

We have circulated LGA website and administrator website information. Are providing valuations for those due to retire as implementing immediate detriment.

Yes; we have just started to look to pay our first cases under Immediate Detriment.

Annex I: Please detail any suggestions for improvement for communicating the second options exercise:

Better GAD calculator, consistent info from central resource.
Briefings throughout the county as only held employee briefings in one place to date.
Cannot answer these questions as nobody who dealt with the 2014/15 exercise is still in Service.
Clear and concise information that can be understood by all
Clear information about interest payable v paying off debt via lump sum
Clear information about tax implications of decisions to be made by members
Clear option packs with flowcharts and clarity for individuals on risk and actions required, ensure the tools used are tested and correct to limit workloads and prospect of difference versions being issued. Road test with rep bodies and administrators, clear steps for FRAs
Clear, timely and consistent guidance needed from the outset.
Ensure a suite of guidance documents/ resources is produced centrally for FRA's to use so that all individuals get the same information. Ensure the information can be clearly understood by interested parties.
Ensuring the communication is clear and a consistent message is being provided across all FRA's
FRAs to have the right people involved at the beginning - form a proper project group.
Have national consistent comms to issue. Scenario examples. Factsheets. Use the new Member website.
Improved information regarding impact and value for money
More appropriate time scales
more detail for FRAs on their responsibilities and actions required, it is better for FRAs to communicate with members and have control over this process by cascading standardised communications from LGA
More use of Social Media and possibly radio adverts to the community as a lot of contact details will be out of date
National advertising campaign
National Awareness Campaign. Simplification of message with worked examples. Confidence in that this is not a pensions scam.
Need more information at inception so that a considered approach to information flow can be taken from the outset, the previous exercise didn't have the systems and support in place that we now have and hopefully the full guidance will be available with all the associated documentation rather than services being left to find their way through what was needing to be done.
Online tool/ calculator for members to use

People are more aware of the impact now, better liaison between LGA, Pension Administrators, FRA and the Rep Bodies. Rep Bodies hold a slightly different view of potential outcomes which is causing conflict.
 Presentations that FRAs can use when going out to stations or can view online
 problem identifying the cohort with current addresses
 Request FPS members to contact former colleagues and get in touch if they held a retained post in addition to main post
 Request unions to circulate its membership
 Second option should be limited to service pre 2000. Before undertaking a second exercise clarity is required on how the contribution entitlement will be assessed at the payroll data will not be available.
 set guidelines for what is considered as best endeavours
 Several requests via the weekly Routine Notice
 simpler messaging, more templates and joint working
 Standard set of documents across all FRAs to ensure consistent messaging.
 Station presentations
 streamline the process for potential take-ups, provide clear FAQ's, with easy to follow process maps, reduce jargon and provide as much support to FRA's to deliver it with success
 template letters setting out options and disclaimers
 Template letters written in a clear & understandable way, with FAQ's. Employers should have the opportunity to feed back on draft versions before they're finalised.
 The last option exercise was centrally coordinated - so all FRA's had the option to use the same forms of communications for options/quotes etc
 Timely and accurate comms
 Understanding of interest if paying back over a fixed period
 Value for money not communicated very well
 Videos for members to access at anytime of day
 Would like the LGA to provide words to ensure consistency of approach
 Would need National standardised literature to send out.