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**Hampshire
& Isle of Wight**
FIRE & RESCUE AUTHORITY

NOTICE OF MEETING

<i>Meeting</i>	HIWFRA Firefighters' Pension Board	<i>Clerk to the Hampshire & Isle of Wight Fire and Rescue Authority</i> CFO Neil Odin
<i>Date and Time</i>	Tuesday, 31st January, 2023 11.00 am	<i>Fire & Police HQ</i> <i>Leigh Road,</i> <i>Eastleigh</i> <i>Hampshire</i> <i>SO50 9SJ</i>
<i>Place</i>	Meeting Room Z, Fire & Police HQ, Leigh Road, Eastleigh	
<i>Enquiries to</i>	<u>members.services@hants.gov.uk</u>	

The Openness of Local Government Bodies Regulations are in force, giving a legal right to members of the public to record (film, photograph and audio-record) and report on proceedings at meetings of the Authority, and its committees and/or its sub-committees. The Authority has a protocol on filming, photographing and audio-recording, and reporting at public meetings of the Authority which is available on our website. At the start of the meeting the Chairman will make an announcement that the meeting may be recorded and reported. Anyone who remains at the meeting after the Chairman's announcement will be deemed to have consented to the broadcast of their image and anything they say.

Agenda

1 **APOLOGIES FOR ABSENCE**

To receive any apologies for absence.

2 **DECLARATIONS OF INTEREST**

To enable Members to disclose to the meeting any disclosable pecuniary interest they may have in any matter on the agenda for the meeting, where that interest is not already entered in the Authority's register of interests, and any other pecuniary or non-pecuniary interests in any such matter that Members may wish to disclose.

3 **MINUTES OF PREVIOUS MEETING** (Pages 3 - 6)

To confirm the minutes of the previous meeting.

4 DEPUTATIONS

Pursuant to Standing Order 19, to receive any deputations to this meeting.

5 CHAIRMAN'S ANNOUNCEMENTS

To receive any announcements the Chairman may wish to make.

6 SCHEME ADVISORY BOARD

To receive a verbal update on the Scheme Advisory Board.

**7 LEGISLATION AND LOCAL GOVERNMENT (LGA) UPDATE REPORT
(Pages 7 - 80)**

To receive a report providing an update on legislation and the Local Government Association.

**8 FIRE PENSION BOARD STATUS REPORT AND RISK REGISTER
REVIEW (Pages 81 - 98)**

To receive an update on the development of key issues and to review the Risk Register.

ABOUT THIS AGENDA:

This agenda is available through the Hampshire & Isle of Wight Fire and Rescue Service website (www.hantsfire.gov.uk) and can be provided, on request, in alternative versions (such as large print, Braille or audio) and in alternative languages.

Public Document Pack Agenda Item 3

AT A MEETING of the HIWFRA Firefighters' Pension Board held at Fire and Police HQ, Eastleigh on Wednesday, 12th October, 2022 at 14:00

* Present

Chairman:

* Stew Adamson

Vice-Chairman:

Richard Scarth

* Sean Harrison

* Mark Hilton

* Richard North

* Councillor Roger Price

Ross Singleton

* Dan Tasker

47. **APOLOGIES FOR ABSENCE**

Apologies were received from Richard Scarth and Ross Singleton.

48. **DECLARATIONS OF INTEREST**

Members were mindful of their duty to disclose at the meeting any Disclosable Pecuniary Interest they had in any matter on the agenda for the meeting, where that interest was not already in the Authority's register of interests, and their ability to disclose any other personal interests in any such matter that they might have wished to disclose.

No interests were declared.

49. **MINUTES OF PREVIOUS MEETING**

The minutes of the last meeting held on 5 July 2022 were confirmed as a correct record and signed by the Chairman.

Under matters arising in relation to the Minutes, the Chairman confirmed in relation to Minute 46 that he had discussed with a contact from the Service's Diversity Group 'Inspire' as to whether gender was a factor in firefighters' opting out of the pension scheme. Some light-touch research hadn't proven that gender was a factor, and it was noted that cost being more of an issue for female firefighters' was purely anecdotal. The Chairman would meet with the Chairman of the Group to explore this further, and whether having children impacted on opting out.

50. **DEPUTATIONS**

There were no deputations.

51. **CHAIRMAN'S ANNOUNCEMENTS**

The Chairman had no announcements to make.

52. **SCHEME ADVISORY BOARD**

The Board received a verbal update from the County Councillor Employer Representative. Councillor Price highlighted that issues relating to the Scheme Advisory Board were covered very well in reports later on the agenda, but did highlight the forthcoming Firefighters' Pension Schemes (FPS) AGM taking place at the LGA offices in London on the 25-26 October. It was noted that Ross Singleton, a Scheme Representative Member of the Firefighters' Pension Board and Claire Neale, Employer Pension Manager would be attending.

53. **LEGISLATION AND LOCAL GOVERNMENT (LGA) UPDATE REPORT**

The Board received an update on legislation and the Local Government Association (LGA), (Item 7 in the Minute Book).

Officers presented the report and highlighted that since the last Board meeting, three bulletins had been issued by the LGA which were attached at Appendices A-C of the report. Board Members attention was drawn to paragraphs 9-11 of the report which detailed the issue of the Scottish Public Pensions Agency and their amendment to their commutation provisions from 1 April 2022 to remove the commutation restriction for those retiring before age 55 with less than 30 years' service. Officers highlighted that there had been a significant rise in the number of retirements since 1 April 2022 which may be due to this change. It was heard that the SAB would continue to monitor this, and if wanted to pursue this then would need to present a business case to Government.

Board Members also heard further information relating to the Judicial Review over the McCloud Cost Remedy, and The Pensions Ombudsman (TPO) factsheet recently published on McCloud giving TPO's views. Attention was drawn to details of the FPS AGM which was highlighted by Councillor Price earlier in the meeting. A discussion ensued about inviting colleagues from the LGA to deliver training on key topics to Pension Board Members, and Officers highlighted that the LGA do offer Fire Authority Pension Boards one free training session a year. Board Members were keen for this to be organised and the Clerk would take this forward after the meeting. Board Members also discussed the benefit of Officers providing further training sessions for pension scheme members around issues such as annual allowances, higher taxes, promotions and additional benefits and pensions. This would be explored further by Officers.

RESOLVED:

That the content of the report was noted by the HIWFRA Firefighters' Pension Board.

54. **FIRE PENSION BOARD STATUS REPORT AND RISK REGISTER REVIEW**

The Board received a report which provided an update on ongoing issues (Item 8 in the Minute Book), and also the Board's Risk Register for review. The report was introduced and key issues were highlighted.

The Board heard that in relation to member portal registration, figures at the end of August showed that those registered had surpassed 50% for the first time, and had risen again in September. In response to a Board Member query, it was confirmed that an address tracing programme was used to trace deferred members who may have moved address. It was also noted that pensioner scheme members could opt out of receiving their annual benefit statement electronically and receive a paper copy, and Officers would find out the percentage of pensioners who had requested to receive a paper version. Officers highlighted that once scheme members approached retirement age, they were written to and encouraged to sign up to the portal if they haven't already.

Paragraphs 7-11 of the report highlighted the one outstanding issue in relation to the Combined Fire Authority (CFA), which concerned on-call members who had paid the wrong employee contribution rate. It was heard that letters had gone out to affected members, and queries received had been clarified. Officers would check whether the cost of this would come out of HIWFRA reserves. Officers highlighted other issues detailed in the report including potential strike action, risk review and the Board's risk register which had been presented in an easier to read format as requested by the Board.

Paragraphs 21-32 of the report provided information relating to the Matthews/O'Brien case, and attention was drawn to the cohorts of members and those in scope. It was heard that HIWFRA has been asked to provide more detailed analysis to the LGA to assist in work to introduce the Matthews Remedy, which will run at the same time as the McCloud Remedy implementation and will be a busy period for Officers. Officers asked Board Member views on membership of a project team as detailed at paragraph 32. A query was raised as to whether any representative bodies would be included on the project team and officers would look into this. Suggestions were raised about the possibility of involvement of On-call Support Officers, as well as support from the Past Members Association. Signposting to information about Matthews Remedy, and including in the routine notice was also felt to be useful.

Board Members also heard details relating to Immediate Detriment, McCloud/Sargeant Remedy and the McCloud Remedy Working Group. It was heard that the Working Group had been considering some communications before the implementation of the McCloud Remedy, and Board Members were asked their views on this. Board Members felt that there was a lack of general understanding around this subject amongst scheme members, and more communication and accessible information was needed. The use of webinars and also including information on both the portal and Hampshire Pension Service website was discussed, and thought to be useful. Further advice on implementing this would be sought from the Internal Communication Lead Officer.

In concluding, Board Members were presented with information relating to Ill Health retirements, In Scope Members and McCloud project costings.

RESOLVED:

- i. That the content of the report was noted by the HIWFRA Firefighters' Pension Board.
- ii. That the Risk Register as set out in paragraphs 18-20 and Appendix A was approved by the HIWFRA Firefighters' Pension Board.

Chairman,



**Hampshire
& Isle of Wight**
FIRE & RESCUE AUTHORITY

HIWFRA Firefighters Pension Board

Purpose: Noted

Date: **31 JANUARY 2023**

Title: **LEGISLATION AND LOCAL GOVERNMENT ASSOCIATION
(LGA) UPDATE REPORT**

Report of Chief Financial Officer

SUMMARY

1. This report, together with attachments, provides the framework for this agenda item.

FPS BULLETINS

2. LGA issue a bulletin at the end of each month, they are emailed out to a variety of contacts but can also be accessed via the www.fpsregs.org website. The bulletins contain a lot of information and the key items are highlighted in this report.
3. There have been four bulletins issued since the last Fire Pension Board reports were written. Bulletins 61, 62, 63 and 64 can be found in APPENDICES A – D.

SAB LEVY (BULLETINS 61 & 63)

4. The SAB budget for 2022/23 was approved by the minister and FRAs have been invoiced for their share of the payments.
5. The levy is set at £6.27 per firefighter and will pay for both the work of the SAB and the LGA. The SAB levy is £4.39, and the FRA LGA levy is £1.88.
6. The work of the Fire LGA team provides much support to the Fire sector nationally and ensures that as much as possible there is a consistent

approach for FRAs to adopt. The Fire LGA team is made up of three full time permanent posts and there will also be an additional 12 month fixed term contract post to focus on communication and the three websites which will commence in 2023.

SAB COLLABORATION SESSIONS ON MATTHEWS (BULLETIN 61)

7. To support scheme managers in the delivery of the second options exercise, the SAB, the LGA and the Home Office are working together in the form of collaboration sessions on Matthews.
8. The aim is to discuss the Matthews legislation and policy, the interactions between Matthews and McCloud and the proposed timeline for implementation.

SAB LETTER TO SCHEME MANAGERS ON PENSIONS DASHBOARDS (BULLETIN 62)

9. On 27 October 2022, the chair of the SAB wrote a letter to all Scheme Managers and Local Pension Board chairs regarding the importance of preparing for Pension Dashboards and reminding them of their duties.
10. The Staging Date for Public Sector Pension Schemes will be 30 September 2024 with the requirement to provide value data by 1 April 2025.
11. At one of the next Board meetings, a report from Hampshire Pension Services will be presented which will provide an update on progress for Pension Dashboards.

SEPTEMBER CPI RATE ANNOUNCED (BULLETIN 62)

12. On 19 October 2022, the Office for National Statistics announced the Consumer Price Index (CPI) rate of inflation for September 2022 as 10.1%.
13. Government policy in recent years has been to base the increases under the Pension (Increase) Act 1971 and the revaluation of the pension accounts under section 9 of the Public Service Pensions Act 2013 on the rate of CPI in the September of the previous year.
14. We await confirmation from Government that the revaluation and pension increase that will apply to FPS deferred pension and pensions in payment in April 2023 will be 10.1%.

PUBLIC SECTOR UNIONS GRANTED JUDICIAL REVIEW OVER
McCLOUD COST REMEDY (BULLETIN 62)

15. In July 2022, the Public Sector unions were granted a judicial review in relation to the McCloud remedy costs in the cost control mechanism.
16. The Public Sector unions 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 contribution or improvements in benefits from April 2019 had the cost control process not been paused.
17. The hearing for this was allocated 5 days and commenced on 23 January 2023.

PENSION SCHEME TRANSITIONAL PROTECTIONS: INJURY TO
FEELINGS EMPLOYMENT TRIBUNAL HEARING (BULLETIN 63)

18. The injury to feelings Employment Tribunal which was scheduled to be heard from 14 to 28 October 2022 was vacated.
19. Vacation of the hearing followed agreement in principle as to issues of non-financial loss and to provide further time to negotiate the full settlement details between all parties (including FRAs) through their respective legal representatives.
20. This only applies to all the named original 2015 claims in England and Wales brought by the FBU. The cost of this compensation will be fully met by the Government.

SAB REMEDY ENGAGEMENT SESSIONS (ALL BULLETINS)

21. The Fire SAB were invited by the Home Office to take part in a series of joint engagement sessions with the Police SAB to consider scheme specific versions of the Provision Definition Documents (PDDs).
22. Sessions took place each month between June and January 2023 covering
 - (a) Ill health
 - (b) Early / Late retirement
 - (c) Abatement
 - (d) Contingent Decisions

- (e) Divorce
- (f) CETVs
- (g) Remediable Service Statements (RSS) content
- (h) Remedy timetabling

HM TREASURY PUBLISH TREASURY DIRECTIONS

23. On 14 December 2022, HM Treasury made the Public Service Pensions (Exercise of Powers, Compensation and Information) Directions 2022. They came into force on 19 December 2022 and apply to England, Northern Ireland, Scotland and Wales.
24. The Directions set out how certain powers in the Public Service Pensions and Judicial Offices Act (PSPJOA) 2022 must be exercised. The Act gives relevant government departments powers to rectify McCloud discrimination by making secondary legislation.
25. For the FPS, the Directions apply to the following powers in the Act:
 - (a) Powers to reduce or waive liabilities in relation to correction of benefits and tax relief on contribution adjustments (PSPJOA 2022 Section 18). This includes the facility for 2006 FPS contributions to be retained by the scheme until a deferred choice election is made.
26. There are powers to make provisions for the treatment of voluntary contributions paid in the 2015 FPS and for transfers in and out of the scheme.
27. There are a number of other powers which are covered in the Directions including:
 - (a) A scheme manager's power to pay compensation, setting out the scenarios in which compensation would apply. This is known as direct compensation
 - (b) Powers to make regulations compensating members by adjustment to scheme pays debits. This is known as indirect compensation
 - (c) Powers relating to tax relief on a contingent decision to buy Added Years
 - (d) Powers to make regulations setting out how interest should be calculated and paid on amounts due to the remedy.

- (e) Powers to make regulations setting out the process to follow for paying amounts due to the remedy, including where amount may be netted off
- (f) Powers relating to the Remediable Service Statements (RSS), including elements that must be provided. The Directions confirm that the RSS must be combined with the Annual Benefit Statement, other than the first RSS which is issued

28. The Home Office will be using these Treasury Directions to help determine some of the regulations needed in the secondary legislation.

RECOMMENDATION

29. That the content of the report be noted by the HIWFRA Firefighters' Pension Board

APPENDICES ATTACHED

- 30. APPENDIX A – [FPS Bulletin 61](#) (September 2022)
- 31. APPENDIX B – [FPS Bulletin 62](#) (October 2022)
- 32. APPENDIX C – [FPS Bulletin 63](#) (November 2022)
- 33. APPENDIX D – [FPS Bulletin 64](#) (December 2022)

Contact:

Claire Neale, HR Strategic Adviser (Specialist) – Employer Pension Manager,
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FPS Bulletin 61 – September 2022

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

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

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

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Calendar of events

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

Table 1: Calendar of events

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

Actions arising

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

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

FPS

Immediate Detriment Framework guidance updated

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

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

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

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

Potential industrial action

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

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

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

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

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

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

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

[Member communications following eligibility factsheet](#)

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

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

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

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

Technical query log

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

No new queries have been added this month.

FPS England SAB updates

SAB levy 2022-23

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

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

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

SAB meeting 8 September 2022

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

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

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

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

SAB remedy engagement sessions

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

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

The most recent sessions considered contributions and ill health.

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

SAB collaboration sessions on the Matthews remedy

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

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

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

Other News and Updates

TPR scheme return

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

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

TPR warns employers about auto-enrolment duties

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

PDP consultation response

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

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

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

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

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

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

Public sector exit payments

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

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

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

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

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

Pensions awareness campaign postponed

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

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

HMRC

HMRC publishes Pension Schemes Newsletter 142

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

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

Events

FPS coffee mornings

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

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

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

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

[27 September 2022 – Matthews communications](#)

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

AGM – 25 and 26 October

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

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

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

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

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

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

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

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

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

We look forward to welcoming you to the event!

Useful links

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

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- [Welsh Government Fire circulars](#)

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FPS Bulletin 62 – October 2022

Welcome to issue 62 of the Firefighters' Pensions Schemes bulletin.

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

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

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Calendar of events

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

Table 1: Calendar of events

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

Actions arising

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

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

FPS

Matthews – FPS member website update

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

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

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

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

Matthews – Member warm up communications

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

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

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IQMP – Central list

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

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

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

Fire and Rescue workforce and pension statistics published

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

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

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

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

Technical query log

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

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

FPS England SAB updates

SAB remedy engagement sessions

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

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

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

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

[SAB letter to scheme managers on pension dashboards](#)

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

These duties include:

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

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

Other News and Updates

Public sector unions granted judicial review over McCloud cost remedy

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

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

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

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

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

The Pensions Regulator (TPR) enforcement and prosecution policies updated

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

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

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

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

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

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

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

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

The Pensions Regulator (TPR) speech at PLSA conference

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

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

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

Pension Dashboards - Draft guidance on deferring staging date published

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

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

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

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

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

Pension Dashboards - Progress update report

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

The report covers:

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

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

Pension Dashboards - Videos published

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

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

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

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

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

The response confirms that the DWP will:

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

Research on public value of dashboards published

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

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

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

Update on connecting early participants to the dashboard ecosystem

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

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

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

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

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

September 2022 CPI rate announced

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

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

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

HMRC

Pension Schemes newsletter 143

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

The newsletter includes articles:

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

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

Message from HMRC on the 2021/22 event reporting mechanism

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

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

The data required for each member is as follows:

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

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

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

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

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

Lifetime Allowance

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

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

Events

FPS coffee mornings

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

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

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

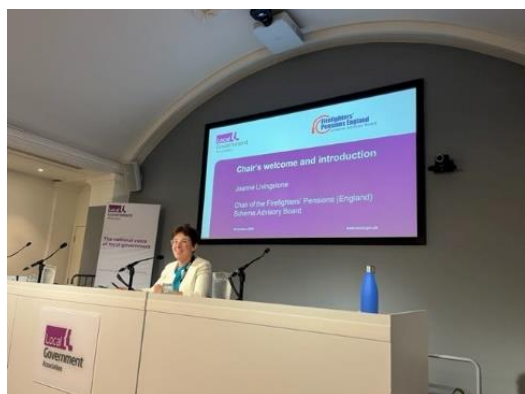
[11 October 2022 – General update on Matthews and 2015 remedy project management](#)

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

FPS AGM - Event summary

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

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



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

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

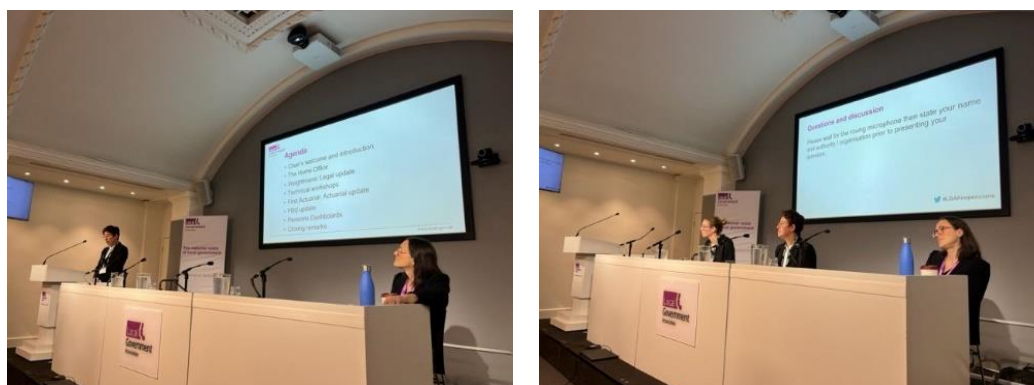


We ended the day with a networking drinks reception with lots of animated conversation between colleagues and friends.

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

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

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



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



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

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

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



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



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

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

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

Legislation

Statutory Instruments

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

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

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

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

Useful links

- [The Firefighters' Pensions \(England\) Scheme Advisory Board](#)
- [FPS Regulations and Guidance](#)
- [FPS Member](#)
- [Khub Firefighters Pensions Discussion Forum](#)
- [FPS1992 guidance and commentary](#)
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FPS Bulletin 63 – November 2022

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

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Calendar of events

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

Actions arising

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

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

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

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

FPS

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

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

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

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

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

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

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

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

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

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

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

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

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

Technical query log

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

Queries regarding the following have been added:

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

FPS England SAB updates

SAB levy 2022-23 – Request for Purchase Order numbers

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

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

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

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

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

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

SAB remedy engagement sessions

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

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

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

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

Other News and Updates

PDP publishes updated standards

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

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

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

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

PDP Webinars

PDP will host the following webinars in December 2022:

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

[Click here to return to Contents](#)

- 8 December 2022 – Dashboards standards: design standards consultation

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

TPO – Factsheets

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

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

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

TPR consultation on dashboard enforcement

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

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

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

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

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

TPR expects schemes to:

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

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

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

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

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

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

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

Regulators issue scam warning to pension schemes and savers

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

The warning urges savers to:

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

TPR blogs

TPR published two blogs in November 2022:

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

GAD blog on Public Service Pension Schemes

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

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

- the complexity of administration provider or administration system procurement

Autumn Statement 2022

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

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

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

New ministerial appointments

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

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

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

HMRC

HMRC publishes newsletter 144

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

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

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

Public service pensions remedy newsletter

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

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

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

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

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

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

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

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

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

Events

FPS coffee mornings

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

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

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

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

[22 November 2022 – Discretions workshop](#)

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

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

Legislation

Statutory Instruments

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

Useful links

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

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

FPS Bulletin 64 – December 2022

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

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

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

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



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

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

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Calendar of events

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

Table 1: Calendar of events

Event	Date
FPS coffee morning	5 and 19 January 2023
SAB	23 January 2023
FPS Communications Working Group	14 March 2023

Actions arising

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

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

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

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

FPS

IQMP central list

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

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

New address for Health Partners (Board of Medical Referees)

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

Health Partners Group Ltd

The Roller Mill

Mill Lane

Uckfield

East Sussex

TN22 5AA

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

[New webpage created – Retrospective remedy](#)

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

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

[Consolidated Regulation 65](#)

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

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

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

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

Retained firefighter Employment Tribunal pension claims

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

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

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

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

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

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

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

Technical query log

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

There have been no further queries added this month.

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FPS England SAB updates

Festive message from the Chair of the SAB

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

“Dear Friends & colleagues,

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

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

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

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

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

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

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

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

[SAB remedy engagement sessions](#)

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

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

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

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

Other News and Updates

HM Treasury publishes remedy Directions

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

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

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

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

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

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

PDP approach to governance of standards

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

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

Consultation on regulatory framework for dashboard operators

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

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

The consultation closes on 16 February 2023.

Deferred connection guidance published

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

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

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

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

Early connection guidance updated

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

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

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

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

PDP December newsletter

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

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

Deputy Pensions Ombudsman

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

This is an interim appointment for up to 12 months.

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

TPR's joint regulatory strategy update

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

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

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

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

HMRC

HMRC publishes pension schemes newsletter 145

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

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

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

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

Events

FPS coffee mornings

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

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

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

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

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

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

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Legislation

Statutory Instruments

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

Useful links

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

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**Hampshire
& Isle of Wight**
FIRE & RESCUE AUTHORITY

HIWFRA Firefighters Pension Board

Purpose: Noted

Date: **31 JANUARY 2022**

Title: **FIREFIGHTERS PENSION BOARD STATUS REPORT AND RISK REGISTER REVIEW**

Report of Chief Financial Officer

SUMMARY

1. This report provides an update on the development of key items.
2. This report, together with attachments, provides the framework for this meeting agenda.

COMMUNICATION

3. Since the last meeting, the Employer Pension Manager provided a presentation for the pre-retirement course on 7 November 2022 with the next one being on 6 February 2023. The courses have now been booked in right up to November 2026, with three courses a year being run.

IoW RDS ISSUES

4. Some issues have been raised specifically by RDS members on the IoW, we believe that these are general issues, but have stemmed from issues with communication prior to the Combined Fire Authority. We are in the process of collating some of the issues and we are anticipating that we will run some type of session for these members. The format, location and subject matter are yet to be confirmed.

5. There are also some complaints that have arisen around some members from the IoW that elected to purchase backdated service in the Modified Fire Pension Scheme. The complaints related to the approach taken to interest when backdated service was purchased.
6. An initial look at these issues suggests that interest has been charged correctly but that the presentation of the information was unclear. The members concerned have been advised to raise an Internal Dispute Resolution Procedure (IDRP) appeal so that we can investigate properly and provide a full response with an explanation and consideration can then be given to any appropriate compensation.

MEETINGS

7. The Employer Pension Manager continues to attend the fortnightly coffee mornings hosted by the LGA team. She has also attended the recent SE Fire Pensions Officer Group, the Fire Technical Working Group and the Fire Communications Working Group.
8. October 2022 saw the return of the in person Fire Pension Scheme AGM meeting. The Employer Pension Manager attended both days and the Board was also represented by the attendance of Ross Singleton.
9. The two day event had a number of speakers across a range of topics. Day 1 was aimed at Pension Board chairs and centred around governance with talks from
 - (a) Colin Dobbie a consultant actuary from Isio gave a talk on how Local Pension Boards can support both scheme managers and members with the 2015 remedy
 - (b) Alison Murray a partner from Aon, gave a talk on how FRAs can prevent falling foul of cyber risk and security
 - (c) Nick Gannon the policy lead at The Pension Regulator gave an update on the forthcoming Single Code
10. Day 2 was aimed at the technical community and pension administrators with talks from
 - (a) Frances Clark Deputy Head Police Workforce and Professionalism Unit from the Home Office on the view from Government, with updates on both the Matthews and McCloud remedies
 - (b) Jane Marshall a partner from Weightmans LLP and also the legal adviser the Fire SAB gave a legal update on recent caselaw and Pension Ombudsman's decisions
 - (c) James Allen an Actuary from First Actuarial LLP provided an actuarial update on the 202 valuation

- (d) Mark Rowe from the FBU from a members perspective
- (e) Richard James the programme director for Pensions Dashboards and Lucy Stone the business lead for Pensions Dashboards at The Pensions Regulator about the Pensions Dashboards programme
- (f) There was also the opportunity to join one of two workshops one on the Fire 2006 Compensation Scheme and the other on the employer discretions.

MEMBER PORTAL

11. The membership of those registered on the portal continues to rise slowly. The numbers of those registered as at 31 December 2022 are shown in the table below:

HAMPSHIRE & ISLE OF WIGHT FIRE AND RESCUE SERVICE								
HIWFRA - FPS	Active		Deferred		Pensioner		Totals	
Active	Number	% of active membership	Number	% of deferred membership	Number	% of pensioner membership	Number	% of total membership
Registered	677	52.73%	454	35.36%	755	54.67%	1,886	47.76%
Not registered	607	47.27%	830	64.64%	626	45.33%	2,063	52.24%
Total	1,284	100.00%	1,284	100.00%	1,381	100.00%	3,949	100.00%

12. For the pensioner membership, there are 626 or 45.33% not registered on the portal and Hampshire Pension Services have confirmed that 298 or 21.58% of these have elected for a member web opt out.

TPR SCHEME RETURNS

13. Each year the Pension Regulator requires pension schemes to complete a scheme return. This includes information about the Board members, the number of members in each scheme and also the data scoring for both the common and scheme specific conditional data that is present and accurate on pension records.
14. The common data score is made up of things like personal data such as name, address, date of birth etc, while the scheme specific data score varies from scheme to scheme and for Fire would include specific things such as membership data including any transfer in details, CPD, temporary promotions etc.
15. The table below shows the scores for year ending 31 March 2021 and the latest year 31 March 2022, which shows that improvements have already been made across most areas. Work is ongoing with Hampshire Pension Services to improve these scores.

Year end	31/03/2021 (Includes all IOW membership numbers and in the data scoring)					
TPR Scheme Return	November 2021					
Scheme	Actives	Deferreds	Pensioners	Beneficiaries	Common Data Score	Conditional Data Score
1992 Fire Pension Scheme	61	70	945	162	98.71%	95.51%
2006 Fire Pension Scheme	11	440	62	7	95.45%	98.00%
2006 Modified Fire Pension Scheme	22	48	100	6	97.73%	93.18%
2015 Fire Pension Scheme	1,209	557	9	8	98.23%	96.77%
Total	1,303	1,115	1,116	183		

Year end	31/03/2022					
TPR Scheme Return	November 2022					
Scheme	Actives	Deferreds	Pensioners	Beneficiaries	Common Data Score	Conditional Data Score
1992 Fire Pension Scheme	22	82	966	161	99.00%	96.00%
2006 Fire Pension Scheme	20	431	71	7	96.00%	99.00%
2006 Modified Fire Pension Scheme	2	47	107	6	98.00%	98.00%
2015 Fire Pension Scheme	1,634	688	19	8	99.00%	97.00%
Total	1,678	1,248	1,163	182		

RISK REVIEW

16. There are a number of items in pension administration and governance which contain elements of risk to varying degrees. Risks are captured through a variety of ways; some are on the risk register, while others are picked up as part of the regular horizon scanning that the Employer Pension Groups do.

RISK REGISTER

17. The board are asked to review the Risk Register and to suggest any amendments. The Risk Register can be found in APPENDIX A.

MATTHEWS / O'BRIEN CASE

18. On the member FPS website there is a section specifically for the second options exercise and members can complete a claim form with their details if they think they are in scope. So far, we have received 12 forms.
19. At some point in the next few months we will be setting up a project team for Matthews and the first bit of work will be to send out some "warm up" communications to the 897 members that we have identified as being "in scope" for the second options exercise. There will inevitably be some members that are no longer at the last address we hold for them, and we will therefore need to attempt to trace these members, preferably before October 2023.
20. At the last meeting, the Board heard how HIWFRA had been one of the 18 FRAs selected by the Government Actuary's Department (GAD) to supply

individual additional data for each of the members that are in scope for the Matthews remedy.

21. This proved to be a very complex detailed piece of work and required a lot of analysis of data as well as input from the IBC Pensions Admin Team and from the loW payroll teams. Unfortunately, due to the time constraints and the issues we had with contacting the right person on the loW, they were unable to provide any of the pay data required.
22. The data, which was mostly complete, was submitted to the LGA on 9 December 2022.
23. The Employer Pension Manager has been developing a spreadsheet detailing all of the pay data that will be required for each member, as both the actual pay and whole time equivalent reference pay will be required for each scheme year of employment. We also know that where we have pay data that was collected for the first options exercise then this must be used, so this is also being factored in.
24. In addition to this, the Employer Pension Manager is also analysing the data to specifically separate the members into different cohorts. This is because we also need to take into consideration those that will be subject to the McCloud remedy as well.
25. For some, they might be in scope for the McCloud remedy only if they purchase their Matthews remedy service. These members will need to be provided with their Matthews remedy options first, the relevant details will then need to be passed to Hampshire Pension Services so that they can issue the member with their McCloud remedy options at the appropriate time.
26. For others, it might be that they already are in the scheme and have membership in the remedy period. For this group of members Hampshire Pension Services will need to be advised to hold off providing their McCloud remedy options until the member has made their elections and details passed to Hampshire Pension Services regarding the Matthews remedy.
27. For those that are subject to the McCloud remedy these will need to be further split into those that are Deferred Choice (DC) (Active and Deferred) cases and those that are Immediate Choice (IC) (Pensioner and Beneficiary) cases. The IC cases will also need to be categorised further to align them with the McCloud prioritisation timetabling.
28. We anticipate that the Matthews remedy implementation will commence from 1 October 2023 so any preparatory work that can be done between now and the end of September will put HIWFRA in a good position to be able to adhere to the timeframes.

29. The Employer Pension Manager has also recently joined the Matthews Technical Working Group (TWG). This group is co-ordinated by the LGA, but has a small number of representatives from pension administrators and FRAs as well as colleagues from the Home Office and GAD.
30. The Matthews TWG purpose is to identify the processes and communications that will be required by all FRAs, as well as feeding into the legislation and tools that will be provided by GAD. This will help to ensure that we have a much more robust and joined up approach to the second options exercise than we did for the first options exercise in 2014 and 2015.

McCLOUD / SARGEANT REMEDY

31. As part of her work as the project manager for the implementation of the McCloud remedy on behalf of Hampshire Pension Services, the Employer Pension Manager has created a pictorial timeline view of the McCloud remedy. This can be found in APPENDIX B.
32. The Employer Pension Manager is continuing to attend both the monthly Cross Whitehall Project Management Group for all Public Sector schemes and the fortnightly Home Office Technical Working Group meetings with the LGA, NPCC, pension administrators from Police and Fire sector and also software suppliers.
33. The Employer Pension Manager met with Sean Harrison and Deborah Beaton from the media and communications team, to discuss an initial comms plan and timeline. Most comms will go into Routine Notice, but later in the year it was agreed that it would be helpful to record a webinar and to also utilise other forums and as appropriate.

IMMEDIATE DETRIMENT

34. As the Board will be aware, HIWFRA has currently paused the Immediate Detriment option to members. It was hoped that when the additional tax legislation required for the McCloud remedy was in place that consideration could be given to restarting this.
35. The technical consultation on the tax legislation ran between 24 November 2022 and 6 January 2023 and the Employer Pension Manager attended a round table discussion with HMRC. This was also attended by the Home Office, the LGA and NPCC along with other Police and Fire representatives and enabled us to talk through the legislation in detail.
36. The good news is that the tax legislation does do what we hoped it would and resolves the concerns we had for members tax issues. It is due to come into force from 6 April 2023 and will have retrospective effect, where

applicable; the bad news is that unfortunately this legislation is only effective when the secondary legislation comes into force from 1 October 2023, which means that should Immediate Detriment be used prior to this date, the tax issues, concerns and risks we have still exist.

37. The LGA and the FBU had re-entered negotiations on MoU that had been drawn up and unfortunately these negotiations have not been able to be progressed to a mutually satisfactory conclusion, so there are no amendments available to the MoU and there are no timescales for when these negotiations might be concluded.
38. Realistically with the tax legislation needing the secondary legislation to be effective which will not be before 1 October 2023 and with no progress on the MoU it does look unlikely that HIWFRA will be in a position to offer Immediate Detriment again.
39. We will of course keep this under review and should there be any exceptional circumstances surrounding a particular case, then we will utilise the delegation that is in place to make an informed decision.

McCLOUD REMEDY WORKING GROUP

40. The McCloud Remedy Working Group continues to meet monthly and helps to ensure that a consistent approach is used across all partners and aids the sharing of resources and knowledge.
41. The next challenge for this group will be to identify all the members that have some opted out service during the remedy period. We know that members that have opted out service may have the option to raise a contingent decision and may be given the opportunity to have the service re-instated.
42. We are still waiting for some further clarification and guidance from the Home Office about the exact criteria that will be required and details on how this process is likely to work, but in the meantime, we can start to identify the potential cohort of these members and collect the necessary data as we know that reinstatement options will have to be provided to this group.

IN SCOPE MEMBERS

43. As part of the work in the Cross Whitehall Group, the Home Office issued a scheme specific Provision Definition Document (PDD) on Eligibility. This confirmed the position about how transition dates and protection status should have been originally awarded to members in 2012.
44. Following this, the LGA issued their eligibility to remedy factsheet in August 2022. This highlighted that we needed to carry out a more detailed review

or all firefighters transition dates and protection status' that had been awarded in 2012, specifically for those that had multiple employments during the remedy period.

45. As a result of this work, there were an additional 294 records across all status of members that were identified as being in scope for remedy. Of these:
 - (a) 60 were found to have the correct transition date and protection status.
 - (b) 188 were found to have an incorrect transition date and or protection status, but the records could be amended as the amendment would have no effect on remedy
 - (c) 46 were found to have an incorrect transition date and protection status, and these amendments could not be changed without altering the remedy options.
46. The 46 members are a mix of member status and have a variety of protection status. Due to the complexities of trying to explain the issue to members, some of which have left employment, the resources required to resolve the individual issues and the timings in trying to correct the position before 1 October 2023, a pragmatic decision was made that these cases will be left and be corrected as part of the overall remedy situation.
47. The board may recall that in June 2022, HIWFRA issued letters to all active members to inform them if each of their roles were in scope or out of scope for remedy. As a result of this additional work on eligibility, 112 active members who initially received an out of scope letter were sent a revised "now in scope" letter at the end of November 2022.

REMEDY TIMETABLING

48. The PSPJOA allows 18 months for members to be provided with their McCloud remedy options. With the amount of work involved for remedy, it is not possible to deal with all cases immediately and equally we do not want to leave all cases until the end. The workload needs to be managed on top of Business as Usual, which will also include those retiring on or after 1 October 2023 and the implementation of the Matthews remedy.
49. Across the Police and Fire sectors, collaboration work with stakeholders has taken place to identify what would be an acceptable priority order. The timetable which has received agreement from the SAB, takes into account four main areas, the statutory dates, Immediate Choice cases, Deferred Choice cases and Miscellaneous cases. It further splits each of the four areas to show over what period remedy will be applied.
50. The timetable is helpful as it will enable administrators to concentrate on particular groups at the same time, albeit multiple strands working in

conjunction. It will also enable effective communications to be published which will notify members of when they can expect remedy. Clearly all members will want their remedy as soon as possible and it will be important to manage expectations.

51. Hampshire Pension Services are working on identifying the exact number of members that fall into each of the cohorts which will then enable them to fine tune the timetable according to the number of cases they have across Hampshire and IoW FRA, West Sussex FRA and Hampshire and IoW Constabulary.
52. It would be helpful if to know if the Board has any particular comments or views about the SAB approved remedy timetable which can be found in APPENDIX C.

RECOMMENDATIONS

53. That the content of the report be noted by the HIWFRA Firefighters' Pension Board
54. That the risk register as set out in paragraphs 16-17 be approved by the HIWFRA Firefighters' Pension Board

APPENDICES ATTACHED

55. APPENDIX A – Risk Register
56. APPENDIX B – McCloud pictorial Timeline view
57. APPENDIX C – Remedy Timetable

Contact: Claire Neale, HR Strategic Adviser (Specialist) – Employer Pension Manager, Claire.neale@hants.gov.uk, 0370 779 2790

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		Impact				
		Negligible	Minor	Moderate	Major	Catastrophic
		1	2	3	4	5
Likelihood	Rare	1	2	3	4	5
	Unlikely	2	4	6	8	10
	Possible	3	6	9	12	15
	Likely	4	8	12	16	20
	Almost certain	5	10	15	20	25

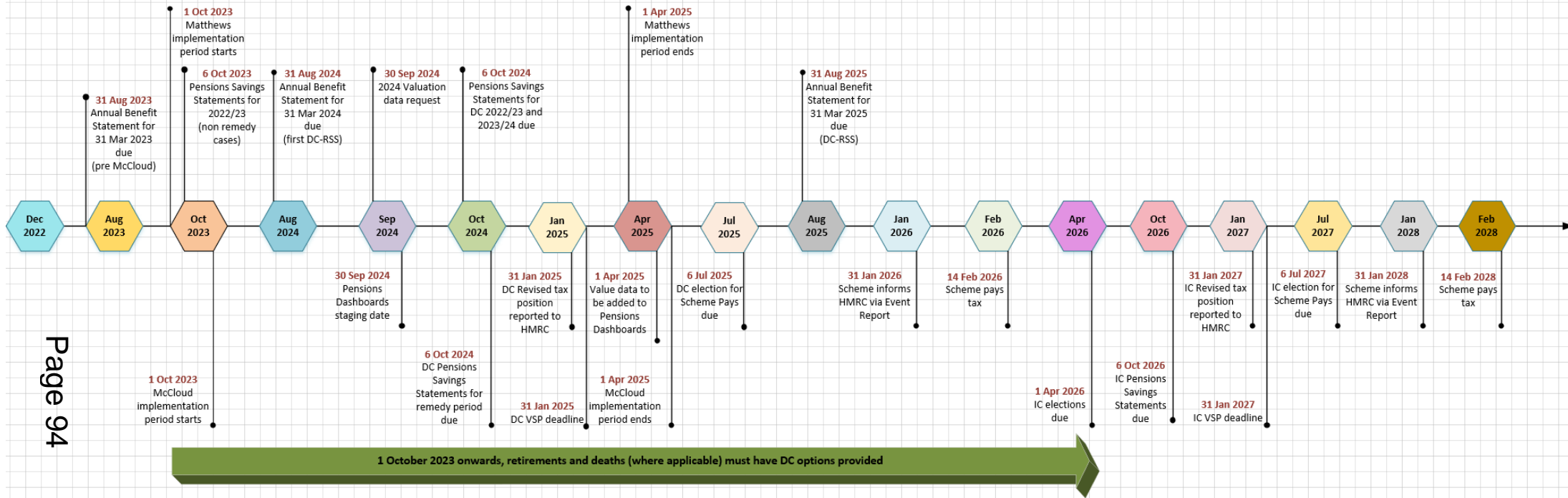
Risk Register for Fire Pensions

Risk number	Date identified	Risk area	Risk description	Likelihood	Impact	Risk score	Control measure / mitigation	Likelihood after mitigation	Impact after mitigation	Risk score after mitigation	Risk owner
1	12/05/2017	Operations	Failure to administer the pension scheme in a proper and effective manner	2	3	6	a) Liaison with employer b) End of Year c) Employer web (UPM access) d) Fire Employer Group & Pensions Admin Group e) Fire Pension Board f) Management oversight and escalation to Chief Finance Officer for HIWFRA or Standard's & Governance Committee or Director of Operations as appropriate g) Diversification – we run a Shared Services arrangement h) Ability to call in temporary staff for peak workloads i) Business continuity plan	1	3	3	Scheme Manager
2	12/05/2017	Financial	Failure to pay the right amounts on time and in line with legislation	3	3	9	Pensions Services: - a) Testing software b) Internal and External Audits c) Standardisation of systems and processes d) All processes and calculation have a “doer” and a separate “checker” e) Monthly mortality screening for pensions in payment f) Declaration of Entitlement forms annually to pensioners and beneficiaries living overseas or upon mail being returned g) Participation in National Fraud Initiative reporting	2	3	6	Pension Administrator
3	12/05/2017	Funding	Failure to adequately account for fund pension contributions	2	4	8	a) Strong financial plan for HIWFRA b) Planned budget c) Aim to complete all Home Office returns on time	1	4	4	Scheme Manager
4	12/05/2017	Regulatory and Compliance	Failure to identify and interpret and implement legislation correctly	3	4	12	a) Scheme Advisory Board b) Local Government Association (LGA) c) Regional Fire Pension Officer Group d) Fire Technical Group e) Fire Communication Working Group f) Fire Pension Board g) Employer Pension Manager as a dedicated resource liaising between - Fire Employer Group & Pensions Admin Group, pulling together - Key Accountabilities for IBC Pensions Admin Team, HR and Hampshire Pension Services	1	4	4	Scheme Manager
5	08/10/2020	McCloud	Failure to adequately resource and successfully implement the McCloud remedy to all affected members within the timescales prescribed	4	4	16	a) Staff recruited specifically for McCloud tasks or to backfill positions so more experienced staff can be released for project b) Communications are developed in a timely manner c) Project is managed effectively with robust plans, reporting and escalation d) Key involvement from the Employer Pension Manager with both the Fire Technical Group and Fire Communications Working Group to ensure all information is received e) Work across departments to be co-ordinated from the McCloud Remedy Working Group	2	4	8	Scheme Manager
6	25/03/2022	Matthews	Failure to obtain all relevant information from IoW Council or to adequately resource and successfully implement the Matthews remedy for HIWFRA to all affected members within the timescales prescribed.	3	3	9	a) Liaison with IoW Council, IBC Pensions Admin Team and Hampshire Pension Services b) Communications are developed in a timely manner c) Project is managed effectively with robust plans, reporting and escalation d) Key involvement from the Employer Pension Manager with both the Fire Technical Group and Fire Communications Working Group to ensure all information is received e) Work across departments to be co-ordinated from the Fire Employer Group	2	2	4	Scheme Manager

BEFORE MITIGATION		Impact				
		Negligible	Minor	Moderate	Major	Catastrophic
		1	2	3	4	5
Likelihood	Rare	1				
	Unlikely	2		Risk 1	Risk 3	
	Possible	3		Risk 2 & 6	Risk 4	
	Likely	4			Risk 5	
	Almost certain	5				

AFTER MITIGATION		Impact				
		Negligible	Minor	Moderate	Major	Catastrophic
		1	2	3	4	5
Likelihood	Rare	1		Risk 1	Risk 3 & 4	
	Unlikely	2		Risk 2	Risk 5	
	Possible	3				
	Likely	4				
	Almost certain	5				

Fire Pension Scheme McCloud implementation key dates

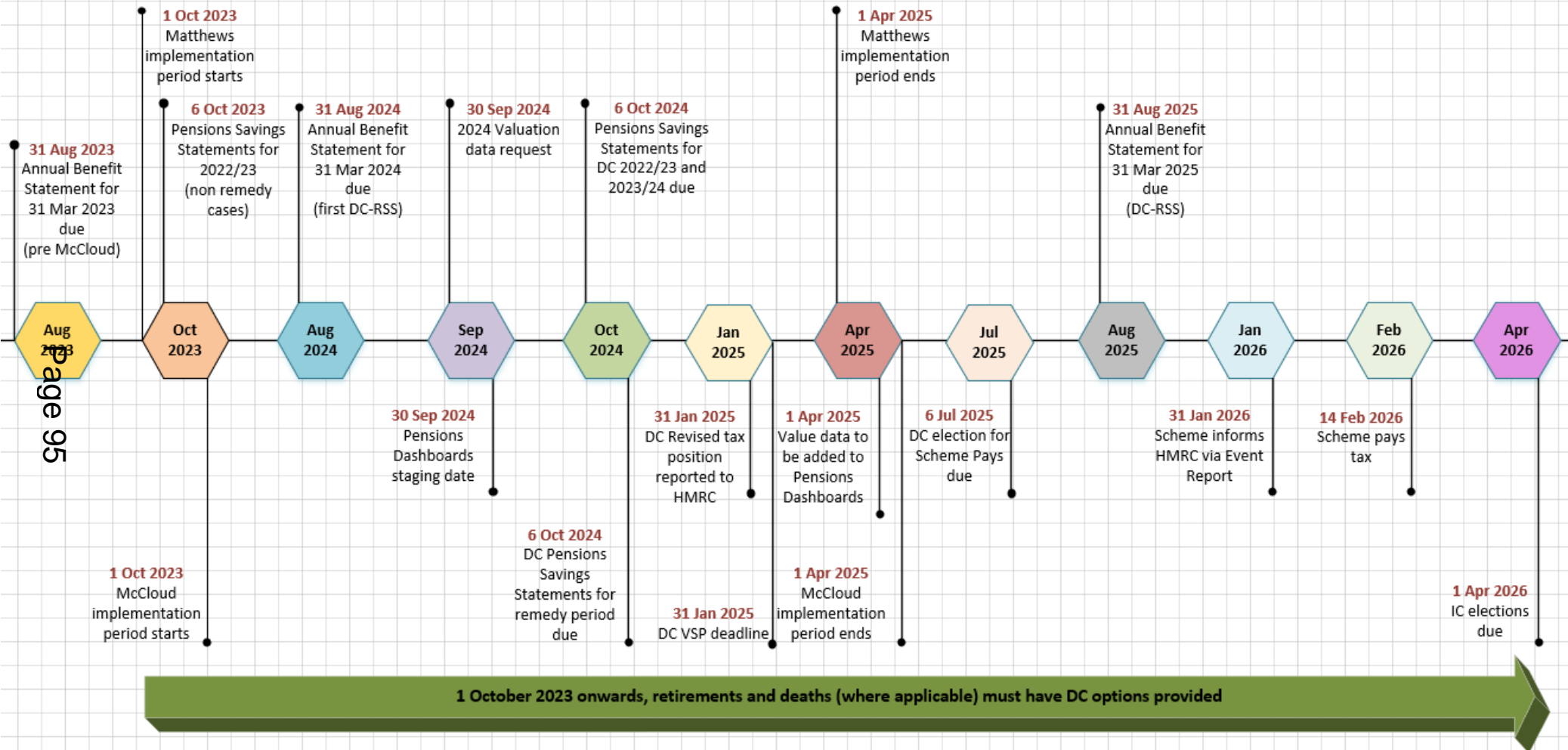


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- Factors / timescales yet to be confirmed**
- Consultation on secondary legislation (exp. February 2023)
 - Contingent decisions for opt outs
 - Contingent decision for other areas (additional benefits, transfers)
 - Upload of membership details and financial details to member records
 - Rollback to legacy schemes and all retrospective actions
 - UPM Software installation / testing
 - Consultation on Matthews remedy legislation
 - Administration and processing of additional records re Matthews remedy

DC – Deferred Choice (Active and Deferred members)
 IC – Immediate Choice (Pensioners and deceased members)
 RSS – Remediable Service Statement

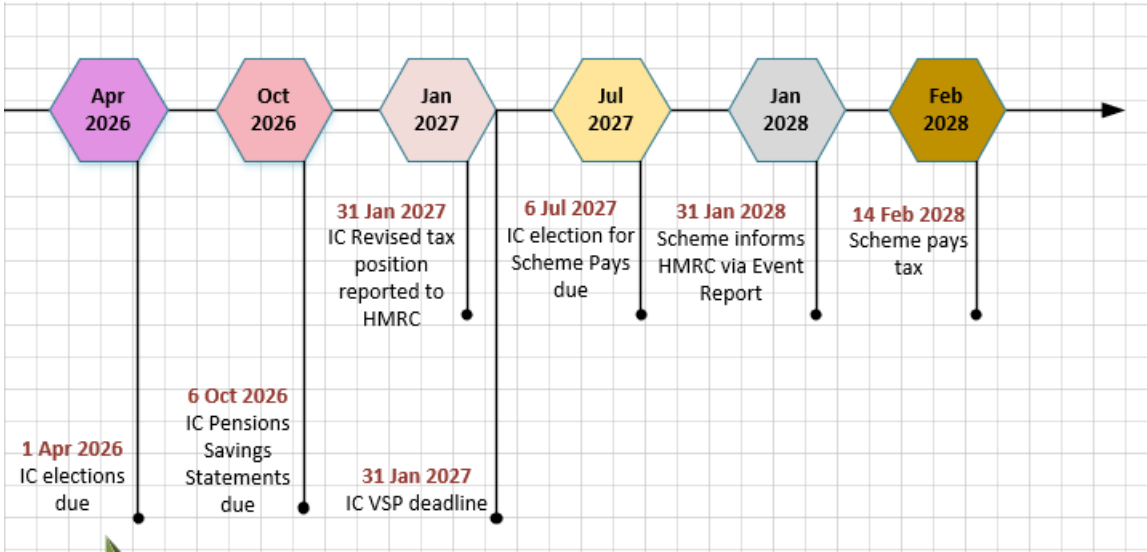
Fire Pension Scheme McCloud implementation key dates



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	2023			2024												2025		
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Statutory Dates																		
Dashboard staging																		
Pension Savings Statements - Deferred Choice Members Only																		
Combined RSS/ABS - Active and deferred members																		
Matthews implementation																		
RSS deadline																		
Schemes to layer BAU processes considering SLA and disclosure deadlines																		
BAU Active and deferred retirements post 1 October 2023																		
2024 Valuation																		

Immediate Choice - RSS																		
Ill-Health retirements																		
Ill-health protected re-assessments																		
In Service Death Beneficiaries																		
Beneficiary - Ill-Health retirement re-assessment case																		
Unprotected and taper Beneficiary pensioners (not IHR)																		
Unprotected and taper pensioners																		
Protected pensioners - FPS 1992																		
Protected pensioners - FPS 2006																		
Protected beneficiaries																		
Contingent decision - opt-out																		

Deferred Choice																		
Unprotected and taper active and deferreds																		
Protected active and deferreds																		
Contingent decision - opt out																		

Misc - no RSS																		
Revisit immediate detriment																		
Pension credit members																		
Contingent decisions opt-outs																		
Contingent decisions other																		
Club Transfer Out re-calculations																		
Non Club Transfer Out re-calculations																		
Club transfer in re-calculations																		

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