

# General Data Protection Regulation Compliance Actions for Administering Authorities in the LGPS

## Why Is Data Protection So Important?

Pension schemes necessarily hold and process significant amounts of personal data relating to members. As a matter of good governance, it is important that member data is safeguarded. There is already a legal obligation on LGPS fund Administering Authorities to keep member data secure, but new legislation will come into force in May 2018 that will have a significant impact on the obligations of Administering Authorities and the potential financial penalties if they get it wrong.

## The GDPR and LGPS Administering Authorities

The General Data Protection Regulation (GDPR) will have direct effect throughout the EU from 25 May 2018. It applies to all EU member states and provides a single EU legal framework for the processing of individuals' data. The maximum potential fine for breaching the GDPR will be €20 million (or 4% of global turnover if higher). The government has confirmed that, despite Brexit, the GDPR will be enforceable in the UK from May next year.

Administering Authorities are responsible for the personal data held by their LGPS funds, meaning the GDPR changes are relevant to them. Every pensions team should be actively planning how to ensure compliance with the GDPR.

Administering Authorities must demonstrate compliance with the GDPR in relation to their LGPS fund. They should be able to show in a meaningful way that both the overall governance structure for data protection compliance and the individual policies and procedures relating to data processing are compliant.

### Who Needs to Know?

This document is relevant to anyone working in data protection/compliance or supporting an LGPS fund, and aims to highlight the main steps that Administering Authorities will need to consider in complying with the GDPR in relation to their LGPS funds. Where an authority has already implemented general GDPR compliance processes, or has them in the pipeline, the steps we have set out can be tailored to work in conjunction with or in addition to those processes.





# The GDPR – Actions for Administering Authorities

## 1. Maintain Records of Data Processing

It will become a mandatory requirement for Administering Authorities who employ more than 250 people, or who process sensitive personal data (about members' health or family circumstances), to maintain records of all personal data processing activities. The records may have to be presented to the Information Commissioner's Office (ICO) on demand.

### Action for Administering Authorities

- Audit the current position and identify any gaps in compliance.
- Take steps to ensure all personal data processing activities are recorded.

## 2. Review Data Security Measures and Assess Adequacy

The GDPR retains the current obligation to have appropriate technical and organisational data security measures in place, but also provides that certain specific measures (such as encryption) should be used "where appropriate".

It also requires that processes incorporate "privacy by design and default", i.e. compliance with the GDPR needs to be integrated into all data processing and should be the default setting on all privacy arrangements.

### Action for Administering Authorities

- Develop a compliance plan to ensure appropriate technical and organisational data security measures are in place both at the authority and with any third party service provider.
- Review existing applications and processes that involve the use of personal data and ensure they are secure.
- Implement a policy to ensure that data is only stored for the minimum period necessary.
- Consider whether data encryption should be used, especially for sensitive personal data such as health data.
- Default settings (for example, on member portals) must be configured to automatically provide data security.

## 3. Update Service Provider Contracts

The GDPR requires new content to be inserted into all service and data sharing agreements that govern the use of personal data. It also imposes direct liability on such service providers for data protection compliance.

### Action for Administering Authorities

- Work with current service providers and any other third party that receives data from the LGPS fund, e.g. actuaries/auditors, to amend the contractual provisions as necessary to comply with the GDPR.
- Do not agree to any revised contract without first obtaining proper advice that it does not impose additional obligations on the authority/the fund.
- Ensure that the contractual terms applying to all new appointments are compliant with the GDPR.
- Ensure that any third party administrator maintains adequate records.



## 4. Revise and Update Privacy Notices and Consider Whether Member Consent Is Required

The GDPR requires additional content to be included in all privacy notices regarding how personal data will be used by data controllers. A data controller is any organisation that makes decisions on how personal data is to be processed and for which purposes, so will include the Administering Authorities of an LGPS fund. Data controllers must tell any one whose personal data they collect what information is held, how it is used, who it may be shared with and what safeguards are in place.

The GDPR also makes it more difficult to obtain valid consent for the use of personal data – consents must be fully informed, specific, unambiguous and freely given by way of a statement or clear affirmative action by the member.

In addition, there is a specific obligation to retain proof of consent.

### Action for Administering Authorities

- Review and resend all member privacy notices in order to comply with the GDPR.
- Review consents the authority relies on to justify the processing of personal data.
- Consider new or revised consent to data processing by the fund.  
New joiner information may need to be updated.
- Clear records of all privacy notices and consents must be kept.

## 5. Establish a Breach Management Process

The GDPR requires data breaches involving any risk to individuals to be reported to the ICO "without undue delay", and within 72 hours of becoming aware of the breach in any case. The report must contain details of the breach, including the number of individuals affected, the likely consequences and the steps being taken to address/mitigate the breach.

Affected individuals must also be notified directly if the breach is a "high risk" to their rights and freedoms.

### Action for Administering Authorities

- Establish an effective data breach response plan that ensures any breach is addressed and assessed for the obligation to notify and that the relevant ICO report and any member notifications can be made in a timely fashion.

## 6. Appoint a Data Protection Officer (DPO)

As public bodies, Administering Authorities may be required to appoint a DPO. The European data protection authorities recommend that a DPO is appointed even if an organisation is not required to have one under the GDPR. The DPO is expected to be appropriately qualified and should report directly to the senior management at the authority. The DPO will be the contact person in the organisation for questions related to processing of personal data in respect of the LGPS fund, as well as the rest of the Administering Authority's functions.

### Action for Administering Authorities

- Appoint a suitably qualified DPO, if your organisation is required to have one. This could be the Authority's appointed general DPO, if there is one, provided that person meets the criteria.
- Where Administering Authorities share pension services, one DPO could be appointed to more than one authority in respect of their LGPS funds.





## 7. Ensure Processes Are in Place to Cater for the New Individual Rights

The GDPR introduces new rights for individuals, including the right of data portability, the right to restrict processing, the right to object to processing, the right to object to direct marketing and the right to be forgotten – i.e. the right to have one's personal data deleted.

### Action for Administering Authorities

- Identify which of the new rights may be exercised by members.
- Establish procedures to ensure that the new rights can be exercised.

## 8. Carry Out Data Protection Impact Assessments (DPIA)

DPIAs must be carried out in relation to all "high risk" processing. This is where there is a high risk to rights and freedoms, for example, extensive profiling of individuals using automated processing or large scale processing of sensitive personal data (e.g. medical information). The European data protection authorities recommend to carry out DPIAs as good practice and to demonstrate accountability for processing personal data.

Consultation with the ICO may be required prior to processing in relation to high risk processing in certain circumstances.

### Action for Administering Authorities

- Assess whether any use of personal data would be classified as "high risk" under the GDPR and, if so, carry out a DPIA.

## Checklist

1. Create and maintain records of data processing.
2. Review data security measures and assess compliance.
3. Update service provider contracts.
4. Revise and update privacy notices and consider whether member consent is required. If yes, assess whether it meets the GDPR requirements.
5. Establish or update a data breach management process.
6. Appoint a Data Protection Officer (DPO).
7. Ensure processes are in place to cater for the new individual rights.
8. Consider if a Data Protection Impact Assessment (DPIA) is required and, if so, carry one out.

## Contacts



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## APPENDIX B

### Opt out data

	2013/14	2014/15	2015/16	2016/17*	2017/18**
Total number of opt outs in year	22	25	10	75	29
<b>Age of opt outs</b>					
youngest age of opt out in year	24	22	22	21	22
oldest age of opt out in year	57	55	52	53	58
average age of opt out in year	39	41	35	38	38
<b>Ethnicity of opt out</b>					
ethnicity not known	1	2	2	13	5
mixed Caribbean	0	0	0	1	0
white other	3	2	1	1	0
white / British	18	21	7	60	24
<b>Whole time or Retained</b>					
Retained	21	25	9	16	9
Whole-time	1	0	1	59	20
<b>Opt out - automatic re-enrolment</b>					
Retained	21	23	7	12	6
Whole-time	0	0	0	31	7
<b>Total</b>	<b>21</b>	<b>23</b>	<b>7</b>	<b>43</b>	<b>13</b>
<b>Opt out - new joiner (refund)</b>					
Retained	0	2	2	1	3
Whole-time	1	0	1	25	13
<b>Total</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>26</b>	<b>16</b>
<b>Opt out - deferred pension</b>					
Retained	0	0	0	3	0
Whole-time	0	0	0	3	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>0</b>

\*2016/17 year – Automatic re-enrolment date 1 October 2016

\*\*2017/18 year – Only contains data from 1 April to 30 September 2017

## APPENDIX C

Personal & Confidential  
Mr J Bloggs  
The Castle  
Winchester  
Hampshire



**HAMPSHIRE  
FIRE AND  
RESCUE  
SERVICE**

Pensions Services  
The Castle, Winchester  
Hampshire, SO23 8UB

Telephone: 01962 845588  
Fax: 01962 834537

[www.hants.gov.uk/pensions](http://www.hants.gov.uk/pensions)

<i>Enquiries to</i>		<i>My Reference</i>	FIRE/Annual Allowance Notification
<i>Direct Line</i>	01962 845588	<i>Your Reference</i>	AB123456C
<i>Date</i>		<i>Email</i>	pensions@hants.gov.uk

Dear Mr Bloggs

### **Hampshire Firefighters' Pensions Pension Savings Statement 2016/17**

Please find enclosed your Pensions Savings Statement for 2016/17. This statement sets out the increase in your pension savings from the Fire Pension Scheme over 2016/17 for comparison against the HM Revenue & Customs (HMRC) Annual Allowance threshold.

We have sent you this statement for one of the following reasons:

- Our records show that the increase in your pension savings in the Fire Pension Scheme over 2016/17 exceeds the standard Annual Allowance (based on the information we hold on your pension record at the time of the calculation),
- You have requested a statement,
- A third party has requested a statement on your behalf (you will need to forward this to them),
- We have revised a previous statement due to a notification of a data change.

Please refer to our website which gives you more information on how the Annual Allowance works [www.hants.gov.uk/pensions/annualallowance](http://www.hants.gov.uk/pensions/annualallowance).

### **What should I do with this information?**

You will need this statement to work out whether you have to pay a tax charge. If you find that you do need to pay a tax charge, then there are different ways in which you can meet the charge as set out later in this document.

**It is your personal responsibility to pay the correct amount of tax and therefore please take your time to read and understand this information.** You may need to take independent financial advice in order to ensure you understand your tax position.

You can use the HMRC online calculator to work out if you need to pay a charge <https://www.tax.service.gov.uk/paac>

Members must report any annual allowance excess to HMRC as part of the self reporting process, even if a self assessment return is not ordinarily required by HMRC. The **scheme is not responsible** for informing HMRC on your behalf.

You may wish to refer to HMRC guidance; <http://www.hmrc.gov.uk/pensionschemes/calc-aa>.

### **Your pension savings**

There is a limit to the amount of pension you can build up in a year without paying any tax. This limit is called the Annual Allowance.

HMRC measures your pension savings in a specific way, and over a specific time period:

- The increase in your pensions savings is called the Pension Input Amount (PIA).
- The increase in pensions savings is measured over a period which is called the Pension Input Period (PIP for short).

You may be subject to an Annual Allowance tax charge if your PIA for an input period is more than the Annual Allowance in that period. The tax charge applies only to the amount above the allowance.

However, there is a mechanism to carry forward unused Annual Allowance from the last three PIPs to fully or partially offset a tax charge.

### **Pensions savings in the Fire Pension Scheme**

Your pensions savings for the 2016/17 year in this scheme were £40,952.32 and so have exceeded this year's annual allowance by £952.32 (a).

Assuming that you made no other pensions savings between 1 April 2013 and 31 March 2017, you have the following unused annual allowance from the last 3 tax years to help cover the excess shown above;

<b>Tax Year</b>	<b>Annual Allowance</b>	<b>Unused Allowance</b>
2013/14	£50,000	£22,683.52
2014/15	£40,000	£0.00
2015/16	£40,000	£15,688.85

After using the unused allowances above to cover this year's excess, your remaining unused annual allowance available to carry forward for 2017/18 is £15,688.85.

This information is based solely on your pension benefits in the Fire Pension Scheme,

### **Scheme Pays option**

If your total tax charge exceeds £2,000, then you may elect in writing for us to pay the tax charge and in turn we will apply a pension debit (an amount deducted from your pension

when you retire). You will still need to fill out a Self Assessment tax return to declare the excess.

A Scheme Pays Election form has been enclosed with this letter. We must receive any elections for Scheme Pays in respect of 2016/17 by 31 July 2018.

If you do not use the Scheme Pays option, you will need to notify HMRC of your excess and pay the tax charge to them directly.



## Pensions Savings Statement 2016/17

### 1. Your personal details

We have used the following details to produce the figures in this statement.

<b>Name:</b>	Joe Bloggs
<b>National Insurance number:</b>	AB123456C
<b>Payroll number:</b>	01000000
<b>Date of birth:</b>	1 January 1968

### 2. Your pension input amounts

The table below sets out:

- your pensions savings in the Fire Pension Scheme over the 2016/17 PIP, and the three previous PIPs,
- the standard Annual Allowance threshold applicable for each PIP
- the amount by which your pension savings have exceeded the annual allowance

<b>Pension Input Period (PIP)</b>	<b>Pension Input Amount (PIA)</b>	<b>Annual Allowance<sup>a)</sup></b>	<b>Excess over annual allowance</b>
<b>2016/17:</b> (6 April 2016 to 5 April 2017)	£40,952.32	£40,000	£952.32
<b>2015/16:</b> <b>Second part-year PIP</b> (9 July 2015 to 5 April 2016)	£24,311.15	£0 <sup>(b)</sup>	(£15,688.85)
<b>First part-year PIP</b> (1 April 2015 to 8 July 2015)	£8,881.20	£80,000	
<b>2014/15:</b> (1 April 2014 to 31 March 2015)	£43,051.66	£40,000	£0.00
<b>2013/14:</b> (1 April 2013 to 31 March 2014)	£27,316.48	£50,000	£22,683.52

Note: (a) A lower Annual Allowance may apply to the amount of Money Purchase pension savings you can make if you have accessed any pension savings using the new pension freedoms introduced in April 2015.

(b) Up to £40,000 of the unused £80,000 Allowance from the first part-year PIP (1 April 2015 to 8 July 2016) could be carried forward to the second part-year PIP (9 July 2015 to 5 April 2016).

## Underlying data used in the calculations

The figures above are based on the following salary and pension calculations:

Pension Input Period (PIP)	2016/17	2015/16	2014/15	2013/14	2012/13
<b>Pay figures:</b>					
Final Salary pay at end of PIP	£51,458.65	£50,027.51	£55,573.14	£52,518.59	£51,553.01
<b>Pension figures:</b>					
Final Salary 60ths pension at end of PIP	£31,341.27	£28,781.75	£30,103.68	£26,692.26	£24,471.09

**If you believe that any of the above data is incorrect, please contact Pensions Services as this may affect your Pension Input Amount calculation.**

**The values above only take account of this pension scheme.** You will also need to consider any other pension savings you have made during this period, and the last three years, to work out any tax charge. You may wish to seek independent financial advice before you make any decisions.

Members must report any annual allowance excess to HMRC as part of the self reporting process, even if a self assessment return is not ordinarily required by HMRC. The **scheme is not responsible** for informing HMRC on your behalf. Members who submit a paper return should use form SA101. Nil tax returns are not required.

Where members do not ordinarily complete a tax return they should now request one from HMRC to report the excess.

## APPENDIX D

### Example of Additional Pension Benefit (APB) calculation for a member of the 1992 scheme

<b>APB factors dependant on age and scheme</b>	<b>1992 scheme</b>
APB factor at age 30	10.8
APB factor at age 35	12.5
APB factor at age 40	14.5
APB factor at age 45	16.6
APB factor at age 50	19.1

#### **Pay and allowances**

Firefighter pay at 01/04/2017	£29,368.00
10% pensionable allowance	£2,936.80
<b>Total annual pensionable pay</b>	<b>£32,304.80</b>

#### **Contribution rates dependant on pay and scheme**

Employee contribution rate*	14.70%
Employer contribution rate	21.30%
Notional ill health contribution	1.60%
<b>Total contribution rate</b>	<b>37.60%</b>

\* Based on pensionable pay between £30,909 and £41,212

#### **Amount of contributions paid on allowance dependant on scheme**

Employee's contributions (£2,936.80 x 14.70%)	£431.71
Employer's contributions (£2,936.80 x 22.90%)	£672.53
<b>Total amount of pension paid on allowance</b>	<b>£1,104.24</b>

#### **Amount of APB to be added to pension dependant on age and scheme**

APB awarded if age 30 at relevant date (£1,104.24 / 10.8)	£102.24
APB awarded if age 35 at relevant date (£1,104.24 / 12.5)	£88.34
APB awarded if age 40 at relevant date (£1,104.24 / 14.5)	£76.15
APB awarded if age 45 at relevant date (£1,104.24 / 16.6)	£66.52
APB awarded if age 50 at relevant date (£1,104.24 / 19.1)	£57.81



## APPENDIX E

### Example of Additional Pension Benefit (APB) calculation for a member of the 2006 scheme

<b>APB factors dependant on age and scheme</b>	<b>2006 scheme</b>
APB factor at age 30	8.3
APB factor at age 35	9.7
APB factor at age 40	11.5
APB factor at age 45	13.3
APB factor at age 50	15.4

#### **Pay and allowances**

Firefighter pay at 01/04/2017	£29,638.00
10% pensionable allowance	£2,963.80
<b>Total annual pensionable pay</b>	<b>£32,601.80</b>

#### **Contribution rates dependant on pay and scheme**

Employee contribution rate*	10.90%
Employer contribution rate	14.20%
Notional ill health contribution	2.60%
<b>Total contribution rate</b>	<b>27.70%</b>

\* Based on pensionable pay between £30,909 and £41,212

#### **Amount of contributions paid on allowance dependant on scheme**

Employee's contributions (£2,963.80 x 10.90%)	£323.05
Employer's contributions (£2,963.80 x 16.80%)	£497.92
<b>Total amount of pension paid on allowance</b>	<b>£820.97</b>

#### **Amount of APB to be added to pension dependant on age and scheme**

APB awarded if age 30 at relevant date (£820.97 / 8.3)	£98.91
APB awarded if age 35 at relevant date (£820.97 / 9.7)	£84.64
APB awarded if age 40 at relevant date (£820.97 / 11.5)	£71.39
APB awarded if age 45 at relevant date (£820.97 / 13.3)	£61.73
APB awarded if age 50 at relevant date (£820.97 / 15.4)	£53.31

APPENDIX F

Fire Ill Health Pension and Injury Pension review numbers

<b>HFRA</b>		<b>Year review is due</b>				
<b>Ill Health Pensions</b>		<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>
Total ill health pensions over NPA	225	No reviews necessary				
Total ill health pension under NPA	24	Potential reviews necessary				
ill health pension more than 8 years retired	13	No reviews necessary				
Ill Health 8 year review due	7	0	1	0	2	4
ill health pension 4 year review due	4	0	0	2	2	0

<b>Injury Pensions</b>		<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>
Total injury pensions over NPA	81	No reviews necessary				
Total injury pensions under NPA	9	Potential reviews necessary				
Total injury pensions more than 5 years retired	6	No reviews necessary				
injury pension review at 5 years	2	1	1	0	0	0
injury pension review at 3 years	1	0	1	0	0	0

**DWP review**

Total number of injury pensions in payment that need review of DWP benefits - 90

## APPENDIX G

### **New look for firefighters' pension scheme web pages**

If you're a member of a firefighters pension scheme, check out the [new pension web pages](#). These are much more user-friendly and make pension information more accessible. They can be accessed from our [portal](#) by searching for pensions.

There are a range of pensions resources available to firefighters.

- In the new look pages, the 'getting help' section will signpost you according to your query <http://www3.hants.gov.uk/fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/pensionshelp.htm>
- New employer pension groups have been set up with representatives from across the shared partnership from HR, payroll, finance and Pensions Services

### **Who does what?**

- Standards and Governance Committee is the scheme manager and is responsible for setting local policy.
- There is a [Firefighter's Pension Board](#) which scrutinises the actions of the employer and pensions administrator.
- Shared Services HR maintains the policies and is responsible for pursuing things like Ill Health Retirement cases
- Shared Services Payroll and Pensions Administration Team provides information to employees and to Pension Services about pensionable pay. When you raise an IBC query about pensions in ESS, this is the team that deal with your enquiry.
- Pensions Services, who are independent of your employer, administer the pension schemes, providing estimates, Annual Benefit Statements and retirement benefits.

Lots more information can be found on the [new pension web pages](#).

The pension pages for members of the Local Government Pension Scheme will also be updated later this year.

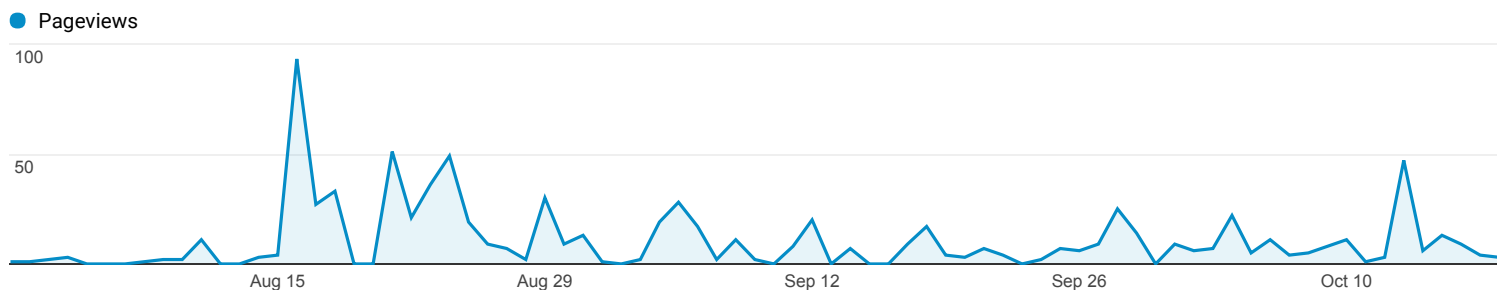


Pages

All Users  
100.00% Pageviews

Aug 1, 2017 - Oct 18, 2017

Explorer



This data was filtered using an advanced filter.

Page	Pageviews	Unique Pageviews	Avg. Time on Page	Entrances	Bounce Rate	% Exit	Page Value
	827 % of Total: 0.01% (11,219,618)	596 % of Total: 0.01% (7,874,711)	00:01:13 Avg for View: 00:01:05 (13.18%)	89 % of Total: 0.00% (3,250,066)	38.20% Avg for View: 55.72% (-31.44%)	20.56% Avg for View: 28.97% (-29.04%)	£0.00 % of Total: 0.00% (£0.00)
1. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps.htm	400 (48.37%)	251 (42.11%)	00:00:46	64 (71.91%)	34.38%	18.75%	£0.00 (0.00%)
2. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/requestestimate.htm	76 (9.19%)	58 (9.73%)	00:02:36	5 (5.62%)	40.00%	25.00%	£0.00 (0.00%)
3. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/pensionshelp.htm	67 (8.10%)	53 (8.89%)	00:02:14	11 (12.36%)	54.55%	40.30%	£0.00 (0.00%)
4. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/whe ntoleave.htm	42 (5.08%)	39 (6.54%)	00:01:48	2 (2.25%)	50.00%	26.19%	£0.00 (0.00%)
5. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/opt out.htm	37 (4.47%)	27 (4.53%)	00:01:49	4 (4.49%)	75.00%	24.32%	£0.00 (0.00%)
6. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/leav eoretire.htm	36 (4.35%)	30 (5.03%)	00:01:10	2 (2.25%)	0.00%	13.89%	£0.00 (0.00%)
7. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/opti n.htm	30 (3.63%)	16 (2.68%)	00:01:53	0 (0.00%)	0.00%	13.33%	£0.00 (0.00%)
8. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/ben efitstatements.htm	25 (3.02%)	23 (3.86%)	00:01:27	0 (0.00%)	0.00%	20.00%	£0.00 (0.00%)
9. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/con tributions.htm	24 (2.90%)	18 (3.02%)	00:01:27	0 (0.00%)	0.00%	0.00%	£0.00 (0.00%)
10. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/pen sionsinfo.htm	23 (2.78%)	16 (2.68%)	00:00:21	0 (0.00%)	0.00%	21.74%	£0.00 (0.00%)
11. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/tem porarypromotions.htm	14 (1.69%)	14 (2.35%)	00:01:00	0 (0.00%)	0.00%	28.57%	£0.00 (0.00%)
12. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/pen sionsreengagements.htm	13 (1.57%)	12 (2.01%)	00:00:46	1 (1.12%)	0.00%	7.69%	£0.00 (0.00%)
13. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/aut oenrolment.htm	9 (1.09%)	8 (1.34%)	00:02:12	0 (0.00%)	0.00%	11.11%	£0.00 (0.00%)
14. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/tran sferpension.htm	9 (1.09%)	9 (1.51%)	00:00:45	0 (0.00%)	0.00%	33.33%	£0.00 (0.00%)
15. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/req uestcctv.htm	8 (0.97%)	8 (1.34%)	00:00:21	0 (0.00%)	0.00%	0.00%	£0.00 (0.00%)
16. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/con tributionholidays.htm	7 (0.85%)	7 (1.17%)	00:00:34	0 (0.00%)	0.00%	0.00%	£0.00 (0.00%)
17. /fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps/fpsc ontact.htm	2 (0.24%)	2 (0.34%)	00:00:28	0 (0.00%)	0.00%	50.00%	£0.00 (0.00%)
18. /fire/pensionsfps	1	1	00:00:36	0	0.00%	0.00%	£0.00

		(0.12%)	(0.17%)		(0.00%)			(0.00%)
19. <a href="#">/fire/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps.htm.</a>	1 (0.12%)	1 (0.17%)	00:00:10	0 (0.00%)	0.00%	0.00%	£0.00 (0.00%)	
20. <a href="#">/hampshirecountycouncil/portal-help/hr/pensionsfps</a>	1 (0.12%)	1 (0.17%)	00:00:06	0 (0.00%)	0.00%	0.00%	£0.00 (0.00%)	
21. <a href="#">/pensionsfps</a>	1 (0.12%)	1 (0.17%)	00:00:09	0 (0.00%)	0.00%	0.00%	£0.00 (0.00%)	
22. <a href="#">/portal-help/hr/salaryexpensesbenefits/pensionshome/pensionsfps.htm</a>	1 (0.12%)	1 (0.17%)	00:00:10	0 (0.00%)	0.00%	0.00%	£0.00 (0.00%)	

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