

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

Risk Register for Fire Pensions

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 Rob Carr 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 HFRA 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 Groups d) Fire Pension Board e) 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 Fire Employer Group	2	4	8	Scheme Manager

BEFORE MITIGATION		Impact						
		Negligible	Minor	Moderate	Major	Catastrophic		
		1	2	3	4	5		
Likelihood	Rare	1						
	Unlikely	2			1. Failure to administer the pension scheme in a proper and effective manner	3. Failure to adequately account for fund pension contributions		
	Possible	3			2. Failure to pay the right amounts on time and in line with legislation	4. Failure to identify and interpret and implement legislation correctly		
	Likely	4				5. Failure to adequately resource and successfully implement the McCloud remedy to all affected members within the timescales prescribed		
	Almost certain	5						

AFTER MITIGATION		Impact					
		Negligible	Minor	Moderate	Major	Catastrophic	
		1	2	3	4	5	
Likelihood	Rare	1		1. Failure to administer the pension scheme in a proper and effective manner	3. Failure to adequately account for fund pension contributions 4. Failure to identify and interpret and implement legislation correctly		
	Unlikely	2		2. Failure to pay the right amounts on time and in line with legislation	5. Failure to adequately resource and successfully implement the McCloud remedy to all affected members within the timescales prescribed		
	Possible	3					
	Likely	4					
	Almost certain	5					



30 December 2021

Dear Hampshire & IOW FRS Local Pension Board (by email),

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

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

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

The following areas were identified as showing potential for improvement:

- Establishing appropriate internal controls for legal matters relating to pensions (i.e. having a suitable Nominated Contact in place)
- Improved communication of the second special members options exercise (with appropriate central resources)

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

Yours sincerely,

Claire Hey
Senior Pensions Adviser/ Board Secretary

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, May 24, 2021 11:57:53 AM
Last Modified: Monday, May 24, 2021 12:44:46 PM
Time Spent: 00:46:53
IP Address: 2.28.174.160

Page 1: Section 1: Current arrangements

Q1 **Hampshire & Isle of Wight Fire and Rescue Service**

Fire and Rescue Authority:

Q2 **Hampshire County Council**

Who is your pension administrator:

Q3 **County council**

Is this arrangement:

Q4

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

1997

Q5

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

No end date

Q6**No**

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

Q7**Respondent skipped this question**

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

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

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

Q9

What position within your FRA oversees delivery of pension administration:

Chief Finance Officer

Q10

Who line manages that post-holder:

Chief Fire Officer

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

Q11

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

Yes,

If yes, what are your key requirements or actions:If no, can you tell us why::

Working with payroll provider

Q12

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

No,

If yes, what are your key requirements or actions:If no, can you tell us why::

Waiting for scope / parameters to be defined by legislation

Q13

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

Yes

Q14

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

Chief Finance Officer

Q15

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

Shared Services HR

Q16

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

Yes

Q17 If yes, please give details::
Do you have any planned resilience in place to deal with revisiting IHRs: Part of a wider Shared Services arrangement that has capacity

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

Q18 Other (please specify):
Is your payroll service: Part of a Shared Services arrangement with Hampshire County Council

Q19 Other (please specify):
Is your pension payroll service: Part of Pension Administration arrangement with Hampshire County Council

Q20 **Both**
Have you changed payroll provider or payroll system since 2015:

Q21
How many years do your payroll records go back:(Please answer in whole numbers)
7

Q22
Please detail any problems you can foresee obtaining pay data for the following:(N.B. Pay data for Sargeant will date back to 2015, pay data for Matthews could relate to as early as the 1970s)

Matthews: **Pay data may not be available prior to 2000**

Q23
For Matthews, eligible individuals will have the opportunity to buy scheme membership back to the start date of their employment. We are interested to know if you will still have access to historic employment records. How many years do your employment records go back:(Please answer in whole numbers)
21

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

Q24
Which department currently manages business as usual (BAU) contribution deductions:
Shared Services payroll provider

Q25

Which department will manage your remedy contribution adjustment process:

Shared Services payroll provider

Q26

Yes

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

Q27

Don't know yet

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

Q28

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

We expect this to be Shared Services payroll provider for active members. This may fall to Remedy Team (finance / payroll / pensions admin) for any other cases or where PAYE cannot be used.

Q29

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

Remedy Team (finance / payroll / pensions admin)

Q30

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

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

Page 5: Section 3: Processes and impact

Q31

Yes

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

Q32

FRA

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

Q33 **Yes**

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

Page 6: Section 3: Processes and impact

Q34 **Yes**

Do you have a nominated finance lead on pensions:

Q35 **Yes**

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

Q36 **Yes**

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

Page 7: Section 3: Processes and impact

Q37 **Yes**

Do you have a nominated legal lead on pension matters:

Q38 **No**

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

Page 8: Section 3: Processes and impact

Q39

Who leads on workforce planning and retention for your FRA:

Shared Services HR

Q40 **No**

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

Q41 **Yes,**

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

If yes, please confirm approximate numbers::
 approx 800 active scheme members to have remedy applied in total with approx 115 able to retire by October 2023

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

<p>Q42</p> <p>Following the confirmation of deferred choice underpin (DCU) in Sargeant, please indicate what information you would like members to have access to (tick as many as apply): Please note this is not a menu or guarantee of delivery. It will allow us to understand individual FRA preferences but does not guarantee delivery of any of the options.</p>	<p>Scenarios for all member cohorts across the schemes</p> <p>Online tool directly linked to scheme membership data</p>
<p>Q43</p> <p>Are you currently providing information to individual members:</p>	<p>Yes,</p> <p>If yes, please provide details: : Immediate Detriment figures provided at the point of retirement. No estimates prior to that. Otherwise just general comms</p>
<p>Q44</p> <p>Who do you think should provide information such as FAQs at key points in the remedy process:</p>	<p>Home Office</p>
<p>Q45</p> <p>Who do you think should be the main contact for individual member enquiries:</p>	<p>Administrator</p>
<p>Q46</p> <p>Who do you think should provide information to the workforce on timescales, next steps etc:</p>	<p>FRA</p>
<p>Q47</p> <p>On a scale of 1 to 10 (1 being the lowest), please indicate how well you feel your FRA communicated the first special members options exercise in 2014/2015:</p>	<p>2</p>
<p>Q48</p> <p>Do you feel that communication was reflected in the numbers of individuals choosing to become a special member:</p>	<p>Yes</p>
<p>Q49</p> <p>Please detail any suggestions for improvement for communicating the second options exercise:</p> <p>Have national consistent comms to issue. Scenario examples. Factsheets. Use the new Member website.</p> <p>FRA's to have the right people involved at the beginning - form a proper project group.</p>	

Q50 **Direct engagement between FRA and administrator (x 44 times)**
 How best would implementation of remedy be coordinated across FRAs in England:

Q51 **Yes**
 Does your FRA have a remedy project team:

Q52 **Yes**
 If yes to Q51, does this include your administrator:

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

Q53
 On a scale of 1 to 10 (1 being the lowest), please indicate the level of internal pensions knowledge and capacity within your FRA:

☆ **9**

Q54 **Establishing new roles/ teams, Buying in additional services from administrator**
 What measures are you considering to address any shortfall in capacity (tick all that apply):

Q55 **Yes**
 Has remedy implementation been identified as a risk on your corporate risk register:

Q56 **Yes**
 If yes to Q55, has this been reported to your Local Pension Board:

Q57 **LGA on behalf of FRAs**
 Who do you feel is best placed to lead on policy engagement with central government on the legislation needed to bring in age discrimination remedy:

Q58 **LGA**
 Who do you feel is best placed to lead on direct service wide communication or provision of content for communication:

Q59 **LGA on behalf of FRAs**
 Who do you feel is best placed to lead on engagement with pension administrators on implementation:

Q60

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

☆

2

Any final comments: :

Our biggest issue is that all the payroll work prior to 01/04/2021 has to be done manually due to the Combined Fire Authority coming into effect. Extracting data from our payroll system and into the format required for the data collection template is going to take some careful thought and planning, Overall, we feel like we are in a good position at this time.

PRIVATE AND CONFIDENTIAL

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

<Name>
<Address>

Date: <TBC>

Your ref: <TBC>

Enquiries to: <TBC>

Our ref: <TBC>

Dear <name>,

Firefighters' Pension Schemes from 1 April 2022

From 1 April 2022 you will move to the Firefighters' Pension Scheme (FPS) 2015 and become a transition member. Your previous benefits are protected, and you will build up new benefits in the FPS 2015.

Background

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

Following consultation, the government has announced how the discrimination will be removed. The changes are being made into law through the Public Service Pensions and Judicial Offices Bill. The Bill is due to come into force on 1 April 2022.

To remove future discrimination from the scheme and ensure equal treatment, all remaining protected members who are not currently members of FPS 2015 will transfer into this scheme on 1 April 2022. The FPS 1992 and FPS 2006 will be closed to all members.

This means that future service for all members will build up in the existing FPS 2015 - this scheme is not changing. Benefits already built up in either of the legacy schemes are fully protected.

What this means for you?

When you retire you will be able to choose to receive FPS 2015 benefits for the period 1 April 2015 to 31 March 2022 instead of your legacy scheme benefits if you want to. Information will be made available to you at a later date about your benefit options for the remedy period.

Further information about the Firefighters' Pension Schemes, including the FPS 2015 contribution rates and the 2015 Remedy, can be found on the Firefighters' Pension Scheme website (<https://fpsmember.org/>) or the HR intranet pages (<https://extra.hants.gov.uk/employee/policy-guidance/pensions/fps-mccloud-sargeant>).

Yours sincerely,



Molly Rowland
Director of People and Organisational Development
Hampshire and Isle of Wight Fire and Rescue Service