

# Warwickshire Fire and Rescue Local Pension Board of the Firefighters' Pension Scheme

Date: Monday 10 October 2022  
Time: 10.30 am  
Venue: Microsoft Teams

## Membership

Martin Reohorn (Chair)  
Barnaby Briggs  
Caroline Jones  
Sian Marsh  
Paul Morley  
Tony Morgan

Items on the agenda: -

### 1. General

#### (1) Apologies

#### (2) Board Members' Disclosures of Interest

(As stipulated by the Public Sector Pensions Act 2013 and set out in Annex A of the Agreed Board Terms of Reference).

#### (3) Public minutes of previous meetings

To approve the public minutes of the meetings held on 14 February 2022 and 6 June 2022.

5 - 12

### 2. Forward plan

13 - 16

### 3. Pensions Administration activity and performance update

17 - 64

### 4. Regulatory and Policy Update

65 - 68

### 5. Risk Monitoring

69 - 78

### 6. Any Other Business

**7. Future Meeting Dates**

To note future meeting dates as follows:

7 November 2022

13 February 2023

**8. Reports Containing Confidential or Exempt Information**

To consider passing the following resolution:

‘That members of the public be excluded from the meeting for the items mentioned below on the grounds that their presence would involve the disclosure of exempt information as defined in paragraph 3 of Schedule 12A of Part 1 of the Local Government Act 1972’.

**9. Exempt Minutes of the Previous Meeting**

79 - 80

To approve the exempt minutes of the meeting held on 6 June 2022.

**Monica Fogarty**  
Chief Executive  
Warwickshire County Council  
Shire Hall, Warwick

To download papers for this meeting scan here with your camera



## Disclaimers

### Disclosures of Pecuniary and Non-Pecuniary Interests

Members are required to register their disclosable pecuniary interests within 28 days of their election of appointment to the Council. Any changes to matters registered or new matters that require to be registered must be notified to the Monitoring Officer as soon as practicable after they arise.

A member attending a meeting where a matter arises in which they have a disclosable pecuniary interest must (unless they have a dispensation):

- Declare the interest if they have not already registered it
- Not participate in any discussion or vote
- Leave the meeting room until the matter has been dealt with
- Give written notice of any unregistered interest to the Monitoring Officer within 28 days of the meeting

Non-pecuniary interests relevant to the agenda should be declared at the commencement of the meeting.

The public reports referred to are available on the Warwickshire Web  
<https://democracy.warwickshire.gov.uk/uuCoverPage.aspx?bcr=1>

### Observing the Meeting

Scheme members and scheme employers who wish to observe the meeting should contact Democratic Services by email ([democraticservices@warwickshire.gov.uk](mailto:democraticservices@warwickshire.gov.uk)) to request a joining link.

This page is intentionally left blank

# Warwickshire Fire and Rescue Local Pension Board of the Firefighters' Pension Scheme

Monday 14 February 2022

## Minutes

### Attendance

#### Committee Members

Martin Reohorn (Chair)  
Barnaby Briggs  
Caroline Jones  
Paul Morley

#### Officers

Neil Buxton, Technical Specialist - Pension Fund Policy and Governance  
Liz Firmstone, Service Manager (Transformation)  
Ian Marriott, Delivery Lead – Commercial and Regulatory  
Paul Spencer, Senior Democratic Services Officer

### 1. General

#### 1(1) Apologies

Victoria Jenks, Pensions Administration Delivery Lead.

#### 1(2) Board Members' Disclosures of Interest

None.

#### 1(3) Minutes of the Previous Meeting

The minutes of the previous meeting were agreed as a true and accurate record.

### 2. Warwickshire Fire and Rescue Local Pension Board, Risk Register

Neil Buxton, Technical Specialist - Pension Fund Policy and Governance, presented this report to the Board. It provided an update on risk appetite, the risk register, risk monitoring and the risks identified. Appendices to the report provided the risk definitions and the risk register. The main area of focus for the risk register was the outsourcing to West Yorkshire Pension Fund (WYPF). A

comprehensive report on this would be provided to the next meeting, to include where responsibility for each risk rested under the new outsourced pensions administration arrangements.

The Chair asked if there was a need to change any of the risks in relation to the current position on immediate detriment. Liz Firmstone would check if there had been an adjustment following the withdrawal of the Home Office guidance. Further information on immediate detriment would be provided as part of an item later on the agenda.

The Chair noted the information provided about the outsourcing and responsibility for risk. Discussion about the responsibilities for the scheme manager, the current position and the potential sharing of knowledge and reduced risk from the revised model, when this was implemented. Officers had reviewed the risk register looking at areas where the new provider should become responsible.

The Warwickshire Fire and Rescue Local Pension Board noted the report and the attached risk register.

### **3. Warwickshire Fire and Rescue Local Pension Board Forward Plan**

Neil Buxton presented this report to the Board, which set out a rolling forward plan for a one-year period. Reference to the training sessions which would be provided for the Board.

Barnaby Briggs asked about the recurring item on administration service outsource. There would be periodic reports to this Board relating to the outsourced aspects. The Chair understood these would explain how the revised arrangements had 'bedded in'. It was viewed as similar to the administration activity and performance update reports. Liz Firmstone suggested that the forward plan report could include how the outsourcing process was going and part of it would be a post-implementation review and then ongoing monitoring. There was an expectation that someone from WYPF would present the reports to the board at least initially.

The Chair noted the plans for training for the Board and where possible, this would be held jointly. He encouraged attendance as this would be useful for new members particularly. Neil Buxton would circulate the training dates to the Board. The Chair referred to an LGA quarterly guide which it would be useful to align the forward plan to.

The Board noted its forward plan, with the changes outlined above.

### **4. Warwickshire Fire and Rescue Local Pension Board, Policy Update**

Neil Buxton presented this report to the Board, which set out the policies reviewed either as part of an annual review, or where there had been minor amendments required. Specific sections were provided on the cyber security policy, breaches policy and terms of reference & conflicts of interest policy.

Neil Buxton focussed on the cyber security aspects. There was a reliance on the County Council's ICT infrastructure. A number of meetings had taken place with ICT colleagues and given the importance of having robust cyber security arrangements, a range of tests of systems were proposed. The Pension Regulator placed a lot of importance on cyber security. It was also

important to become conversant with the WYPF practices and policies and how these would interrelate to those in Warwickshire.

The Board noted the content of the report.

## **5. Pensions Administration Service Activity and Performance update**

This report was presented by Liz Firmstone, Service Manager (Transformation). It updated the Board on key developments affecting the administration of the Fire Pension Scheme and the performance of the Pensions Administration Service (PAS). The following areas were highlighted:

- An update on the change of service provider to transfer administration of the payroll functions to WYPF
- On immediate detriment cases, the Home Office guidance had been withdrawn. An update was provided on the current position for Warwickshire and planned way forward
- Consultation on regulation changes
- McCloud/Sergeant project update
- Internal Dispute Resolution Procedure (IDRP)
- Cost control mechanism
- LGA bulletins
- FRA remedy self-assessment survey

Further detail was provided in a number of appendices.

Barnaby Briggs commented on the position on immediate detriment. Endeavours were being made to liaise with fire service personnel whilst this was resolved. Context was provided on the number individuals affected as category 1 or category 2 cases. The Chair agreed that ongoing communication with those affected was important. Liz Firmstone offered to report back on whether there may be any further category 2 cases and the position of those cases identified to date in regard to a 62-day timeframe, linked to a memorandum.

The Chair asked about the McCloud/Sergeant software changes. Warwickshire would be changing to a different software solution (Civica) as part of the move to WYPF and he asked about the data transfer aspects. There were ongoing discussions, and a detailed update could be sought. He clarified that the board just needed to be assured this was in hand.

On the IDR case the Chair asked what type of issue this related to. It concerned reemployment and abatement and was not related to immediate detriment. There were no known trends for IDR cases. It would be helpful to bring an analysis of the FRA remedy self-assessment survey back to the next meeting. This could include comparative information from the collaboration group for the region and it would enable shared learning.

The Board noted the updates.

## **6. Any Other Business**

Barnaby Briggs would provide updated contact details for board member Tony Morgan. He also noted that Councillor Horner was not shown on the invite list for the meeting.

The Chair placed on record his thanks to Neil Buxton as this was Neil's last meeting before retiring and he was wished well for the future. Martin Griffiths had been appointed as his replacement.

A discussion on the potential of having a face-to-face meeting once per year, with June being suggested. There was also an option of using hybrid meeting technology so some participants could join remotely.

## **7. Future Meeting Dates**

The dates of future meetings were noted.

The meeting rose at 2.35pm

.....  
Chair



# Warwickshire Fire and Rescue Local Pension Board of the Firefighters' Pension Scheme

Monday 6 June 2022

## Minutes

### Attendance

#### Committee Members

Martin Reohorn (Chair)

Paul Morley

#### Officers

Liz Firmstone, Service Manager (Transformation)

Victoria Jenks, Pensions Admin Delivery Lead

Andy Carswell, Democratic Services Officer

Martin Griffiths, Technical Specialist – Pensions Fund Policy and Governance

#### Others Present

Helen Scargill, West Yorkshire Pension Fund

Matthew Mott, West Yorkshire Pension Fund

### 1. General

There were insufficient numbers present for the meeting to be quorate. It was therefore agreed that items would be for noting and the Board would not be in a position to make formal binding decisions on any of the items.

#### (1) Apologies

Apologies were received from Sian Marsh, Caroline Jones, Barnaby Briggs and Lisa Eglesfield.

#### (2) Board Members' Disclosures of Interest

There were none.

#### (3) Public Minutes of the Previous Meeting

As the meeting was not quorate the minutes of the previous meeting could not be agreed. The item was deferred to the next meeting.

## **2. Update report for the transfer of Firefighter Pensions Schemes administration and Pensioner Payroll**

The Board were reminded that administration of the Warwickshire Fire and Rescue Pension schemes had been transferred to the West Yorkshire Pension fund, and this had taken effect from April 1. The Board welcomed Helen Scargill and Matthew Mott from the West Yorkshire Pension fund to explain more. There had been a couple of minor issues and queries to resolve when the transfer was initially made, but nothing of any major significance.

The Board were informed that West Yorkshire would now be in a position to provide monthly client reports, and the first of these was due to be received the following week. The reports would contain a series of key performance indicators for the month just passed.

Paul Morley said he had been made aware of some issues regarding delays in information relating to forecasts and estimates being provided to people who were seeking to retire soon. Vicky Jenks (Pensions Admin Lead) said discussions had taken place with the HR and payroll teams at Warwickshire regarding what was expected in terms of relaying this information to West Yorkshire when it was requested. It was accepted that improvements needed to be made to the internal process to ensure the information was sent to West Yorkshire in a timely manner. There had been no change in terms of how the information was updated and who was responsible for it, but there had been changes to how it was processed as it needed to be sent to a different administrator. At the moment the client information held by West Yorkshire was accurate up to February 28; additional information would be required from HR and payroll at Warwickshire if a member indicated they wished to retire in 6-18 months' time.

Regarding annual benefit statements, it was confirmed that going forward this would be handled by West Yorkshire. However Helen Scargill said she did not think all of the relevant information required to do this had yet been sent across. The deadline for sending annual benefit statements was August 31. Vicky Jenks said payroll had been chased to ensure the information is sent across to West Yorkshire as soon as possible. It was expected to be updated on a monthly basis going forward.

## **3. Governance and Regulatory Update**

Vicky Jenks told members the report provided a summary of updates in relation to the cost control mechanism; the ongoing Home Office consultation in relation to McCloud; the Matthews second exercise; the proposed pensions dashboard; and immediate detriment. Members were likely to already have a knowledge of the issues contained in the report as the information was taken from the monthly bulletins sent to Fire Pension Scheme stakeholders.

Helen Scargill said there would be some overlap between Warwickshire's latest governance and regulatory update and the monthly return report that was due to be provided by West Yorkshire the following week, as some of the information contained within it was also gleaned from the monthly update bulletins. The monthly reports from West Yorkshire are due to replace Warwickshire's governance and regulatory updates at future meetings, with two monthly reports likely to be considered each time. It was likely that Warwickshire would continue to provide policy updates at future meetings however.

Members were shown a draft of the next monthly report, which demonstrated what future reports were likely to look like. Helen Scargill drew members' attention to the item on key performance indicators and a series of tables that highlighted the work that was currently taking place and how this compared to previous months. Regarding active members, Helen Scargill highlighted that 13 members were shown to be unknown modified as there had been an issue in how their records had been converted during the system update. Now that it was known to be an issue it could be dealt with. The report also contained a section on possible pension scams, although this was unlikely to be an issue as there are limitations in place preventing Fire Pension Scheme members from transferring their pension into the type of arrangement that could be fraudulent. The monthly reports would highlight in red if there were any actions that needed to be completed by Warwickshire.

Helen Scargill said the FRA had enquired about responses to some questionnaires regarding the 2<sup>nd</sup> modified exercise and McCloud, but the West Yorkshire Pension Fund did not hold the requested information and it did not have the responsibility to reply. Regarding discretions, West Yorkshire had requested a copy of Warwickshire's policies as this was felt to be particularly important following the Ombudsman decision in relation to abatement. It was now not possible to have a blanket policy and West Yorkshire needed to know what circumstances needed to apply for a discretion to be made.

The Chair asked if future updates on the number of web registrations taking place could include a comparison to show how Warwickshire's figures compared to other Fire Authorities. Matthew Mott said this something that was unlikely to be available immediately but could potentially be provided by the autumn.

#### **4. Risk Monitoring**

Vicky Jenks told members that the risk management document would be continually reviewed and updated in relation to both Warwickshire and West Yorkshire going forward. A risk to delivery of service had previously been identified and this was why the transfer of the administration service to West Yorkshire had taken place, but the level of risk was now likely to reduce. Members were told the document included in the agenda pack was the most up-to-date version.

#### **5. Forward Plan**

Members were informed the item relating to outsourcing would be removed from the Forward Plan as this had been resolved. The Chair suggested it would be helpful to have a look at scheme discretions to help members' understanding. Vicky Jenks said attempts were being made to create a standardised discretions document. Additionally the abatement policy was being looked at by the Lead Commissioner – Strategic People Improvement following the outcome of the Ombudsman case.

The Chair said he had taken part in the recent CIPFA local Pension Board training. He said that while it had been interesting, its contents were not relevant or helpful to Fire and Rescue Pension Boards and were aimed primarily at LGPS schemes.

#### **6. Next Steps**

It was agreed that this item was not needed and would be deleted from future meeting agendas.

## 7. Any Other Business

There were no other items for discussion.

## 8. Future Meeting Dates

The dates of forthcoming meetings were noted.

## 9. Reports Containing Exempt or Confidential Information

There were no members of the public present.

## 10. Firefighter Pension Schemes - immediate Detriment update

Vicky Jenks told the Board that the NFCC had sent a letter advising the Fire Authorities to cease processing of immediate detriment payments, due to treatment of tax relief and pension contributions from two different pension schemes. The risk of additional costs relating to compensation payments to the authority has been assessed as significant and although there was a further risk of potential costs if there was a legal challenge to this decision from members, these costs were considerably less than those that would follow if payments were not paused. It was also noted that any costs paid out to members would be compensatory in nature rather than in the form of a refund, and it was not known if they would be exempt from tax. Following receipt of this advice it had been agreed by the Scheme manager to pause payments for category one cases, and this decision was due to be formally ratified at the next Staff and Pensions Committee meeting.

The Chair said he was aware of some Fire Authorities that were continuing to pay out category one cases, while others were continuing with category one and two payments. In some instances however there was political pressure to continue making these payments. Vicky Jenks said revised legislation relating to immediate detriment payments was due to take effect from October 2023; it was felt that the best course of action was to pause making payments and wait to see what happened next. It was not known if retrospective payments would need to be made once the updated legislation took effect, or if new payments would start from October 2023. The Chair stated his frustration that the issue had not been resolved even though the Treasury had been aware of the situation for five years.

It was noted that a previous legal challenge had ended up being settled out of court, and so the topic of immediate detriment payments had not been tested in a court of law. Due to the backlog in cases however it was unlikely any case would get to court before the new legislation came into effect.

The meeting rose at 3.07pm

.....  
Chair

## Warwickshire Fire and Rescue Local Pension Board of the Firefighters' Pension Scheme

13 September 2022

### Forward Plan

#### Recommendation

That the Board notes and comments on the forward plan.

#### 1. Executive Summary

- 1.1 The report provides a plan for items that should be reviewed or discussed by the Board.
- 1.2 This is not a definitive list, and the intention is that it can be updated and amended at each meeting depending on latest developments.

#### 2. Financial Implications

None

#### 3. Environmental Implications

None

#### 4. Supporting Information

- 4.1 The forward plan has been updated since the last meeting and the Chair's report has been added in for the next meeting scheduled in November.
- 4.2 Training on the 2<sup>nd</sup> retained exercise (Matthews) has been removed as work on this project is yet to start. This will be added back into the plan when timescales are clearer on when legislation will be in place.

#### 5. Timescales associated with the decision and next steps

None

## Appendices

1. Appendix 1 - The Forward Plan

## Background Papers

None

	<b>Name</b>	<b>Contact Information</b>
Report Author	Martin Griffiths, Victoria Jenks	martingriffiths@warwickshire.gov.uk, vickyjenks@warwickshire.gov.uk
Assistant Director	Andrew Felton	andyfelton@warwickshire.gov.uk
Strategic Director	Rob Powell Strategic Director for Resources	robpowell@warwickshire.gov.uk
Portfolio Holder	Peter Butlin Portfolio Holder for Finance and Property	peterbutlin@warwickshire.gov.uk

The report was circulated to the following members prior to publication:

Local Member(s): None

Other members: none

## Forward Plan items

## Local Pension Board

Q2 13 <sup>th</sup> September 2022	Q3 15 <sup>th</sup> November 2022	Q4 13 <sup>th</sup> February 2023	Q1 June 2023 (TBC)
Monthly admin report from West Yorkshire	Monthly admin report from West Yorkshire	Monthly admin report from West Yorkshire	Monthly admin report from West Yorkshire
Governance and Regulatory update	Governance and Regulatory update	Governance and Regulatory update	Governance and Regulatory update
Risk monitoring	Risk monitoring	Risk monitoring	Risk monitoring
Report on outsourcing	Report on outsourcing	Report on outsourcing	
	Chair's report		
Forward Plan	Forward Plan	Forward Plan	Forward Plan
Abatement Policy	Discretions Policy	Terms of Reference Conflict of interest register	
	Matthews — 2 <sup>nd</sup> modified retained exercise		

This page is intentionally left blank



## Warwickshire Fire and Rescue Local Pension Board of the Firefighters' Pension Scheme

13 September 2022

### Pensions Administration activity and performance update

#### Recommendation(s)

That the Board notes and comments on the administration reports provided by West Yorkshire Pension Fund (WYPF), for the work they have undertaken to administer the Firefighter Pension Schemes for Warwickshire Fire and Rescue Service (WFRS)

#### 1. Executive Summary

- 1.1 From 1<sup>st</sup> April 2022, WYPF have administered the Firefighter Pension Schemes for WFRS.
- 1.2 As part of this service a monthly report is provided by WYPF which gives details of the work undertaken, key performance indicators and other relevant information regarding work that has been completed.
- 1.3 Warwickshire County Council hold regular contract meetings with WYPF, where items of concern or interest from the monthly reports can be discussed.

#### 2. Financial Implications

- 2.1 None

#### 3. Environmental Implications

- 3.1 None

#### 4. Supporting Information

4.1 Reports for June (Appendix 1) and July (Appendix 2) have been reviewed and discussed with WYPF at a recent client meeting.

4.2 There are no notable concerns with the work that is being undertaken by WYPF.

4.3 WYPF have picked up that there are a number of mismatches between Pensions Administration data and Pensioner Payroll data, which need to be investigated. Information for the records that do not match has been shared and work has started to look at the reasons for the differences and if it is likely that any over/underpayment have occurred. If this is the case WYPF will need to be provided with historical pay information so that they can work out the values. WYPF have indicated that they will not be able to pick up any work to correct payments until the autumn. At this stage it is not anticipated that there will be a significant number or value of under or overpayments, but this will be confirmed in due course.

4.4 Work has also been undertaken, between Warwickshire Payroll Team, Fire Service management team, WY client manager and WCC contract manager to establish a pathway for requests for information from scheme members, where they are retiring or requesting an estimate for potential retirement. There have been a few instances where delays have occurred due to the relay of information between WY and the payroll team. A pathway has been established to be shared with scheme members so that they have a realistic expectation of the timescales for requesting and receiving information.

## 5. Timescales associated with the decision and next steps

5.1 None

### Appendices

Appendix 1 – June administration report

Appendix 2 – July administration report

### Background Papers

None

	<b>Name</b>	<b>Contact Information</b>
Report Author	Lisa Eglesfield, Victoria Jenks	<a href="mailto:lisaeglesfield@warwickshire.gov.uk">lisaeglesfield@warwickshire.gov.uk</a> , <a href="mailto:vickyjenks@warwickshire.gov.uk">vickyjenks@warwickshire.gov.uk</a>
Assistant Director	Andrew Felton Assistant Director Finance	<a href="mailto:andyfelton@warwickshire.gov.uk">andyfelton@warwickshire.gov.uk</a>
Strategic Director	Rob Powell Strategic Director for Resources	<a href="mailto:Robpowell@warwickshire.gov.uk">Robpowell@warwickshire.gov.uk</a>
Portfolio Holder	Portfolio Holder for Finance and Property	<a href="mailto:peterbutlin@warwickshire.gov.uk">peterbutlin@warwickshire.gov.uk</a>

The report was circulated to the following members prior to publication:

Local Member(s): None

Other members: None

This page is intentionally left blank

# Monthly Report

June 2022

Warwickshire Fire Authority



Prepared by:

**Matt Mott**

Governance and Business Development Manager

Mobile: 07815 476877

Email: [matt.mott@wypf.org.uk](mailto:matt.mott@wypf.org.uk)

West Yorkshire Pension Fund  
Aldermanbury House  
4 Godwin Street  
Bradford  
BD1 2ST

[www.wypf.org.uk](http://www.wypf.org.uk)

Follow WYPF on Twitter [www.twitter.com/wypf\\_lgps](https://www.twitter.com/wypf_lgps)

Follow WYPF on Facebook [www.facebook.com/westyorkshirepensionfund](https://www.facebook.com/westyorkshirepensionfund)



# Contents

1 Regulations/Fire Scheme Update .....	4
2 Member Update .....	9
3 Administration Update .....	9
4 Communication & Training .....	9
5 Key performance Indicators .....	11
6 Work in progress .....	12
7 Member web registrations .....	13
8 Calendar of Events.....	14
9 Membership Numbers.....	15
10 Five Year Audit Plan.....	19
11 Overriding Disclosure Time Limits .....	20

## 1.0 Regulations/Fire Scheme Update

Please take a few minutes to read the Firefighters' Pension (England) Scheme Advisory Board Bulletin ([Link to Bulletin below](#)) and take any action required. [FPS Bulletin 57 - May 2022 \(fpsregs.org\)](#)

### FPS

#### Matthews – Second options exercise

As mentioned in [FPS bulletin 56 – April 2022](#), the Home Office and GAD have asked for additional data on individuals who will be in scope for the second options exercise. On 14 April 2022, we sent an email to lead FRA contacts asking them to complete a short questionnaire which sets out what data is required and the purpose of the data.

This is just a gentle reminder that this request is still outstanding for some FRAs and the deadline for completion is **30 June 2022**. If any FRA has identified an issue with this deadline, we ask that they bring it to our attention at the earliest opportunity.

**ACTION: FRAs to complete Matthews data request questionnaire by 30 June 2022.**

#### Ill health “underpin”

At a recent coffee morning an FRA raised a question as to how the ill health underpin should be applied to a case. The policy intent is to ensure that a protected member who applies 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.

To avoid any such members being placed in a worse position, 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. 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.

Further information on this provision can be found in the Home Office's [consultation response on prospective remedy](#) and their [frequently asked questions document](#). We will look to provide a consolidated version of Regulation 65 in a future bulletin.



## Abatement guidance

HM Treasury (HMT) policy requires public sector pensions to be abated in certain circumstances when a public sector employee is re-employed following retirement. The general principle behind abatement is to protect the public purse from paying a pension and a salary to the same individual i.e. the income from the public purse should not be increased by the addition of a pension.

**FRA's must consider the application of abatement when it occurs in accordance with the regulations of the Firefighters' Pension Schemes**

Readers may be aware that there is currently no prescribed guidance on how abatement should be applied or calculated, as previous guidance issued by the relevant Secretary of State at the time is now out of date. The Home Office is also unable to provide formal direction on the application of abatement, as it is the legal responsibility of each FRA to interpret and apply the rules of the scheme.

In order to support a consistent national approach, we are pleased to let you know that we have now published [informal abatement guidance for FRAs](#) in the "Guides and sample documents" section of [www.fpsregs.org](http://www.fpsregs.org).

The guidance has been collated following the [2019 AGM abatement workshop](#) and using examples of accepted good practice at FRAs. We have consulted with FRA FPS practitioners and administration colleagues as well as the Scheme Advisory Board and Home Office ahead of publication.

The guidance will be kept under review and updated in line with any scheme changes. We also hope to add an example abatement policy in due course. We recommend that FRAs take the guidance into account when considering future cases.

### Annual Benefit Statements 2022

At the [Fire Technical Working Group \(FTWG\) meeting on 7 March 2022](#) we discussed annual benefit statement production (ABS) for 2022. As ABS's in 2022 will be based on current scheme regulations up to 31 March 2022, it was proposed that the same process as last year is followed, and the statements caveated in a similar way. [FPS Bulletin 44 – April 2021](#) provides more information.

However, while the recommendation last year was to suppress projections for fully protected members which would have incorrectly forecast final salary benefits beyond 31 March 2022, administrators were asked to consider that projections for former protected members could be included this year on a fully CARE basis.

The group failed to reach a consensus on this matter, it was therefore agreed that administrators will make the final call on whether to include projections or not. It is the expectation that administrators will notify the FRAs they administer on their decision.

The standard ABS template and notes have been updated with the new scheme year and the revised caveat and [published on the FPS Regulations and Guidance website](#). Examples in the annexes have been brought up to date.

We will continue to review requirements for ABS over the coming years in line with HM Treasury (HMT) policy decisions on remedy.

### **FRA pension contacts**

As mentioned in [FPS bulletin 56 – April 2022](#), we would like to know who at your FRA needs to be sent information on generic pension related matters. We originally asked for this information to be provided by 31 May 2022, however, we have only received a fraction of replies. Please can you give this matter your urgent attention and provide us with the name and email address for your FRA's Scheme Manager. In addition, please also confirm names and email addresses for anyone else who needs to be included in our communications.

Please send this information ASAP by email to [bluelightpensions@local.gov.uk](mailto:bluelightpensions@local.gov.uk) .

**ACTION: FRAs to provide LGA with information on who should receive generic pension information ASAP.**

### **FPS England SAB updates**

#### **TPR factsheet**

We advised readers in [FPS Bulletin 47 – July 2021](#) that the results of the [2020-21 Governance and Administration survey](#) had been published by the Pensions Regulator (TPR).

As part of the annual survey, TPR measures six processes as key indicators of public service pension scheme performance.

The six processes are:

1. Documented policy to manage board members conflicts of interest
2. Access to knowledge, understanding and skills needed to properly run the scheme
3. Documented procedures for assessing and managing risks
4. Process to monitor records for accuracy / completeness
5. Process for resolving contribution payment issues
6. Procedures to identify, assess and report breaches of the law

In 2020-21, 74 per cent of Firefighters' schemes across the UK reported having all six processes in place. This had increased from 55 per cent in 2019.

We have refreshed [six key processes factsheet](#) to reflect the most recent results and give guidance to FRAs and their Local Pension Boards (LPBs) to improve understanding and compliance in the next survey.

## SAB remedy engagement sessions

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.

The first meeting is due to take place on 24 June 2022 where the SAB will be discussing the interest and eligibility PDDs

## Other News and Updates

### DLUHC publishes statutory guidance on special severance payments

On 12 May 2022, the Department for Levelling Up Housing and Communities (DLUHC) published [statutory guidance on special severance payments](#). Best Value authorities in England must have regard to the guidance in circumstances in which it may be appropriate to make Special Severance Payments. The guidance also covers approval, disclosure and reporting requirements. The guidance does not apply to authorities in Wales. You can find a list of the bodies the guidance applies to at the end of the guidance.

The guidance confirms that:

- strain cost related to the early payment of LGPS benefits under regulation 30(6) or (7) (flexible retirement, redundancy, or efficiency retirement over age 55) does not constitute a special severance payment
- strain cost of awarding additional pension under regulation 31 of the LGPS Regulations 2013 may constitute a Special Severance Payment, depending on the terms of the individual's contract [11 Click here to return to Contents](#)
- strain cost related to waiving an actuarial reduction when a member retires under regulation 30(5) may constitute a Special Severance Payment, depending on the terms of the individual's contract.

DLUHC consulted on a draft version of this guidance in 2021.

Considering the above, we contacted the Home Office to establish whether any consideration needs to be taken of the strain costs for releasing benefits early under Authority/Employer initiated early retirement or waiving restricted commutation under the FPS. The Home Office confirmed that, although this policy sits outside of its pensions remit, it has contacted the policy lead at DLUHC, who has confirmed that both instances (i.e. fitness assurances and commutation uplift) would not fall within the scope of special severance payments.

## HMRC

HMRC publishes Pension Schemes Newsletter 139

On 31 May 2022, HMRC published [Pension schemes newsletter 139](#), which contains articles on:

- relief at source — annual return of information for 2021 to 2022
- digitisation of relief at source
- managing Pension schemes service
- Accounting for Tax (AFT) returns

## Events

### FPS coffee mornings

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

The next session is due to take place on 14 June 2022.

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

[3 May 2022 – Contingent decisions](#)

[17 May 2022 – Transitional benefits post 1 April 2022](#)

[31 May 2022 – ABS and RSS](#)

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

### Payroll workshop

On 24 May 2022 we hosted a payroll workshop. The workshop was intended to bring the industry together and give colleagues an opportunity to share feedback and best practices on the data collection exercise needed for age discrimination remedy.

We are pleased to note that the session was well attended with over 50 delegates dialling in and participating in the discussion.

Slides covering the event have been made available and can be found on the [age discrimination implementation page of the FPS Regs and Guidance Website](#). The slides were updated to reflect the comments and suggestions made in the meeting. We will also be updating the [remedy data collection guidance](#) in the coming weeks.

## Legislation

### 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](#)

## 2. Member Update

None

## 3. Administration Update

**Matthews:** to reiterate LGAs message, please ensure you complete LGAs questionnaire by **30 June 2022**.

**Preparing for year-end:** as we are now some time past March some clients have now submitted their month 12 file; if you haven't you should be well on your way to completing it.

Remember, month 12 posting is key to important statutory duties undertaken by WYPF (such as annual benefit statements and pension saving statements).

## 4. Communication & Training

**Pre-retirement seminars attended by WYPF during May:** none (will be included a standing item going forwards)

**FRA training delivered by WYPF:**

- o on-site training was delivered to NYFRS on completion and submission of portal notifications
- o an 'induction-style' overview of WYPF and its services was delivered to the recently-appointed pensions manager at WYFRS
- o induction training delivered for Shropshire FRS

If any FRA wishes to receive training, please contact WYPF for further information

**Annual Benefit Statements (ABS)**

Deferred ABS will be released on to My Pension by the end of July.

Active ABS will be released on to My Pension by the end of August.

**Please note:** the value of benefits shown on the ABS (including projections) will be correct under the current 2015 scheme regulations, however, they will not contain any values concerning the McCloud remedy.

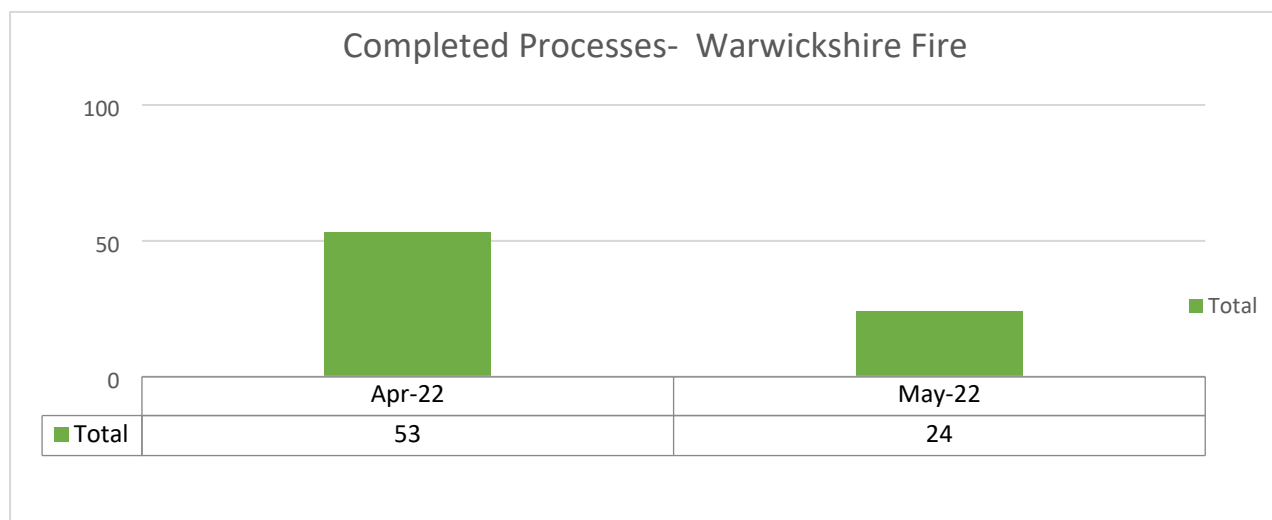
For information about Remedy and Immediate detriment, WYPF will continue to provide information as agreed with FRAs

**Client Survey:** WYPF is compiling our customer survey for 2022. When you receive it, please take a few moments to complete. Your opinion is important to us and helps us understand your needs and develop our service to you.

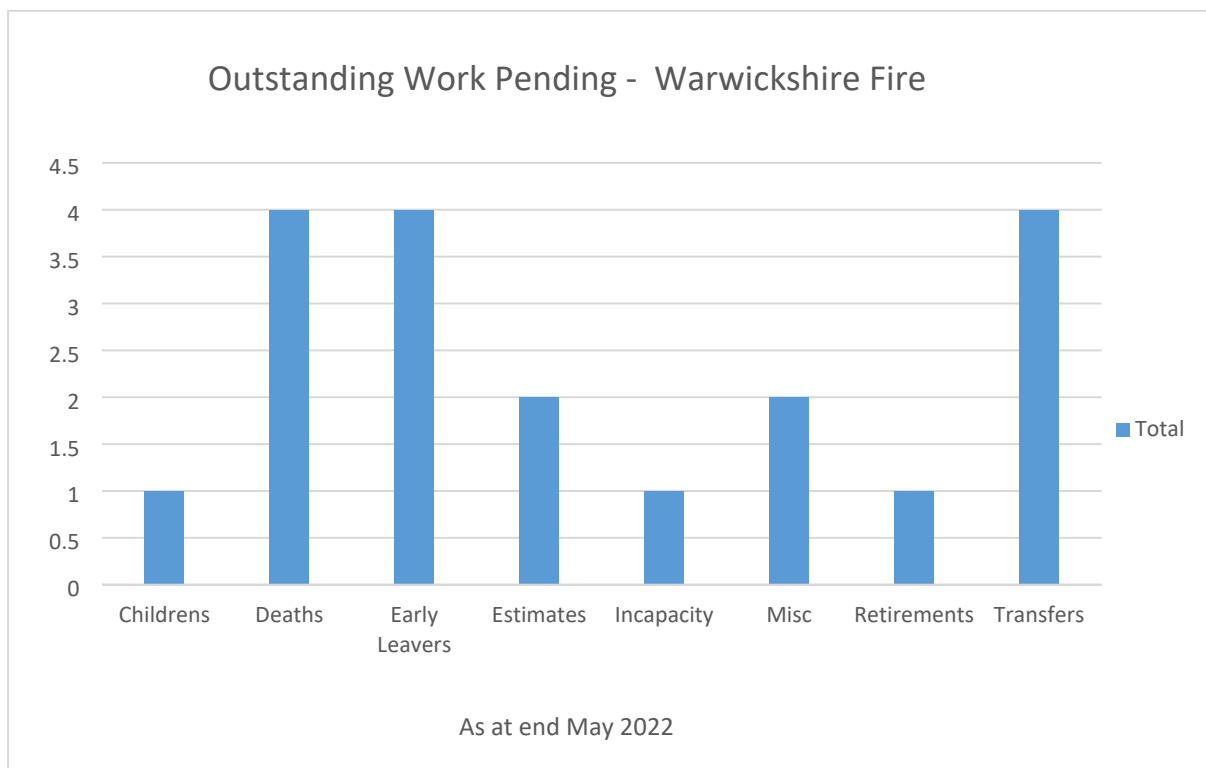
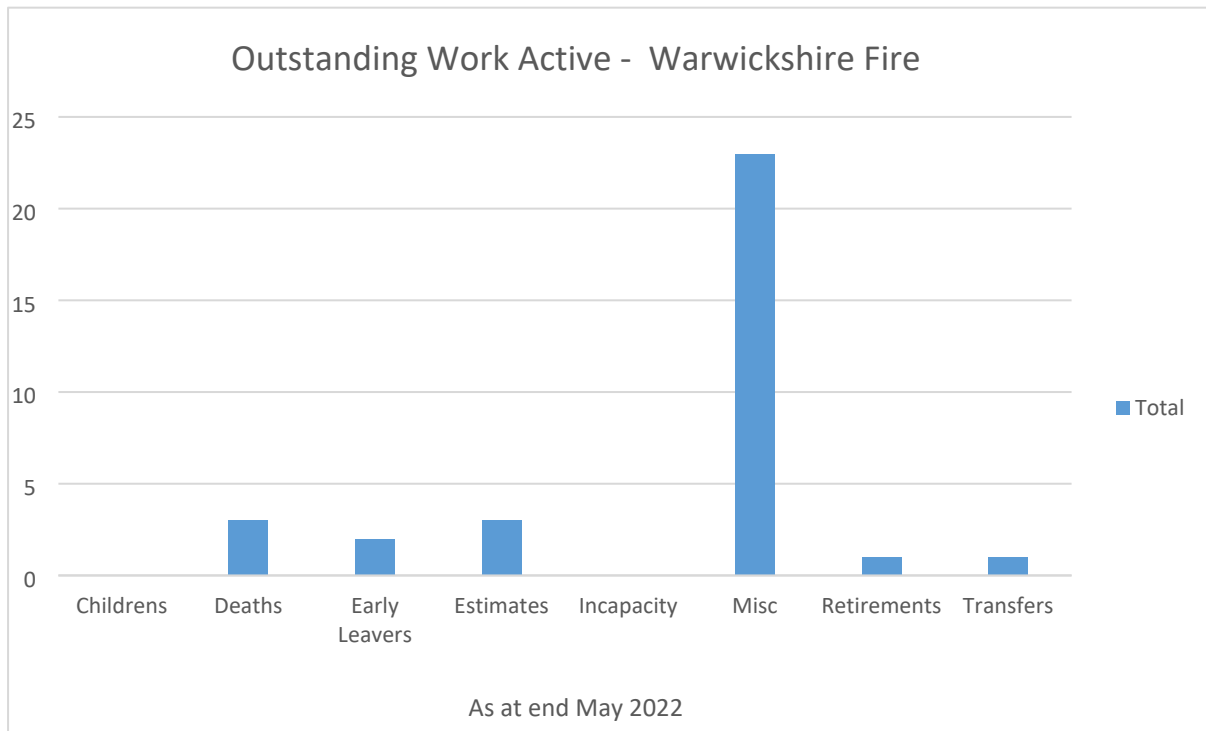
## 5.Key Performance Indicators

### Completed processes

Warwickshire Fire (1 to 31 May 2022)						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Transfer In Quote	1	10	1	85	100	2
Deferred Benefits Set Up on Leaving	1	10	1	85	100	1
Deferred Benefits Into Payment/Payment of Lump Sum	1	3	1	85	100	1
Change of Address	8	20	7	85	87.5	5
Change of Bank Details	1	20	1	85	100	3
General Payroll Changes	3	20	3	85	100	2
Initial letter Death in Retirement	2	5	2	85	100	1.5
Death in Retirement	2	5	2	85	100	2.5
Update Member Details	5	20	5	100	100	1
Monthly Pension	494	Pay date	494	100	100	



## 6. Work in Progress

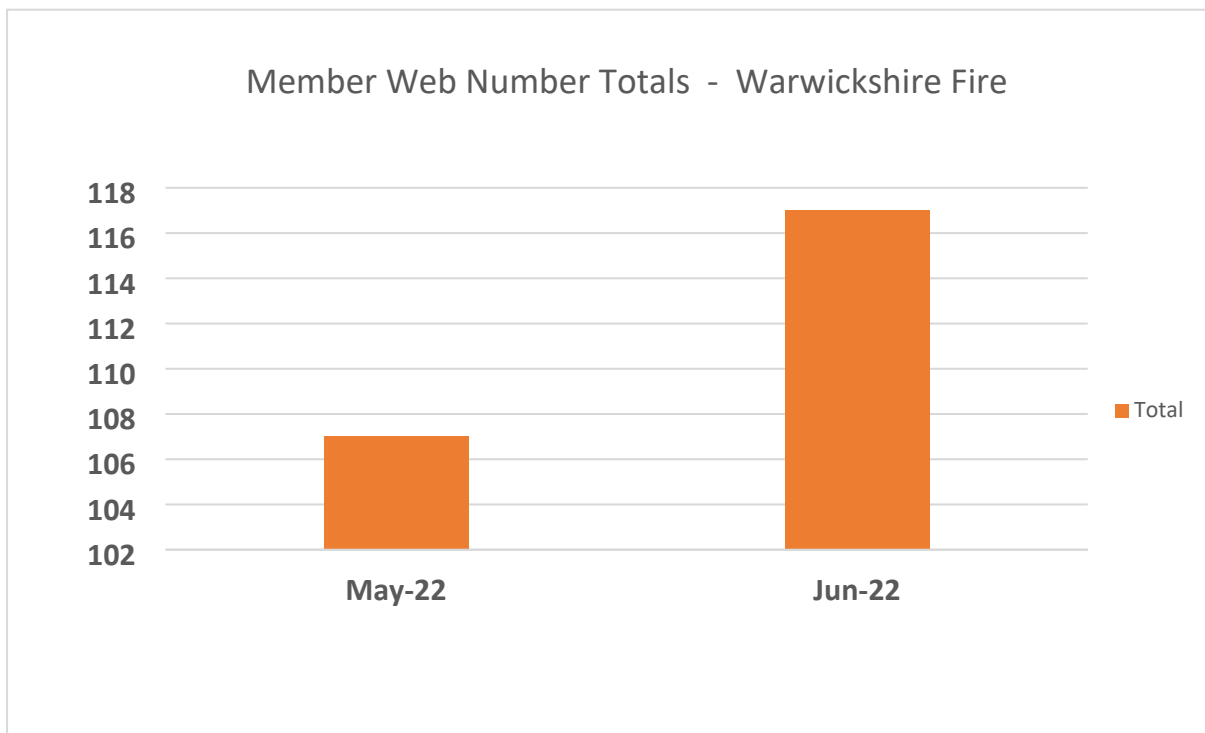




## 7.Member Web Registrations

The number of members signed up to member web are:

Status	Number
Active	25
Pensioner	75
Pensioner Ex-Spouse	0
Beneficiary Pensioner	4
Deferred Ex-Spouse	0
Deferred	13

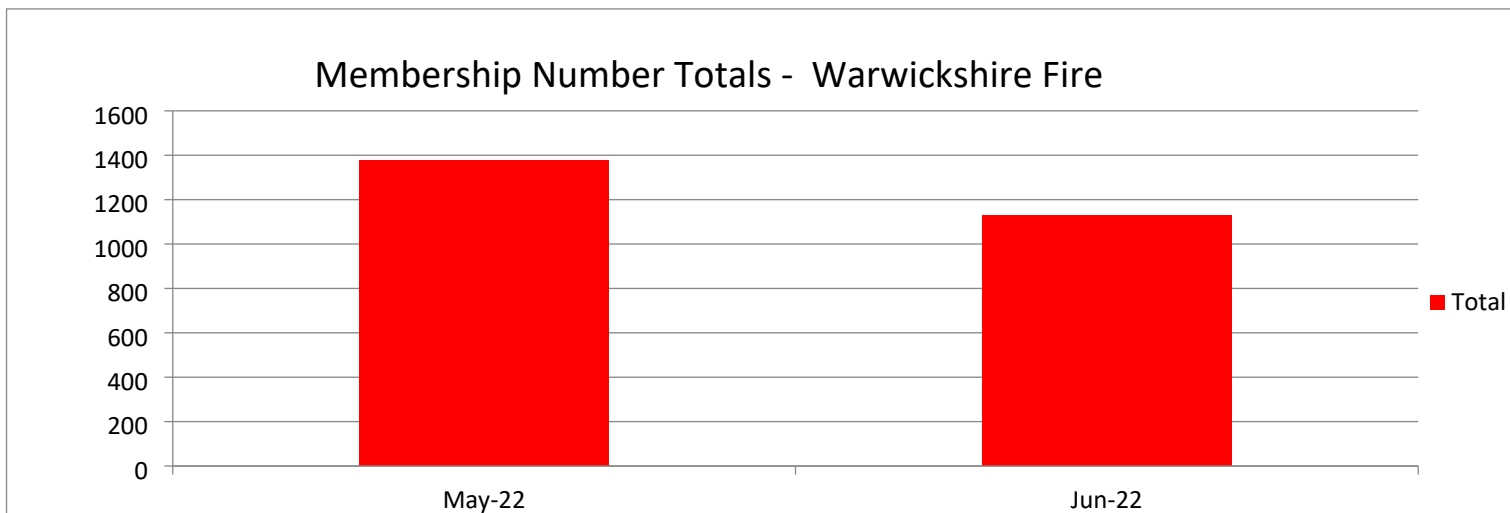


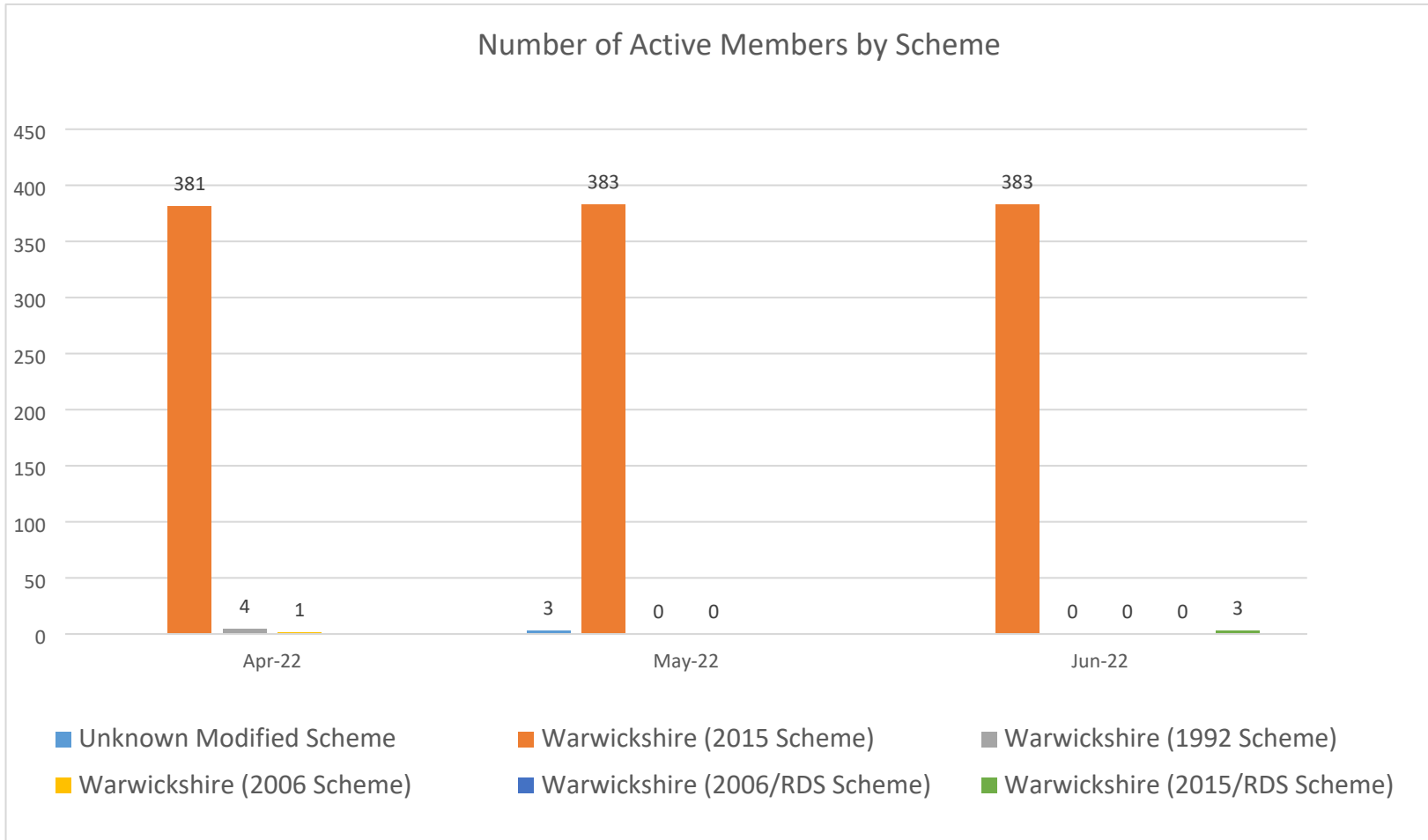
## 8. Calendar of Events

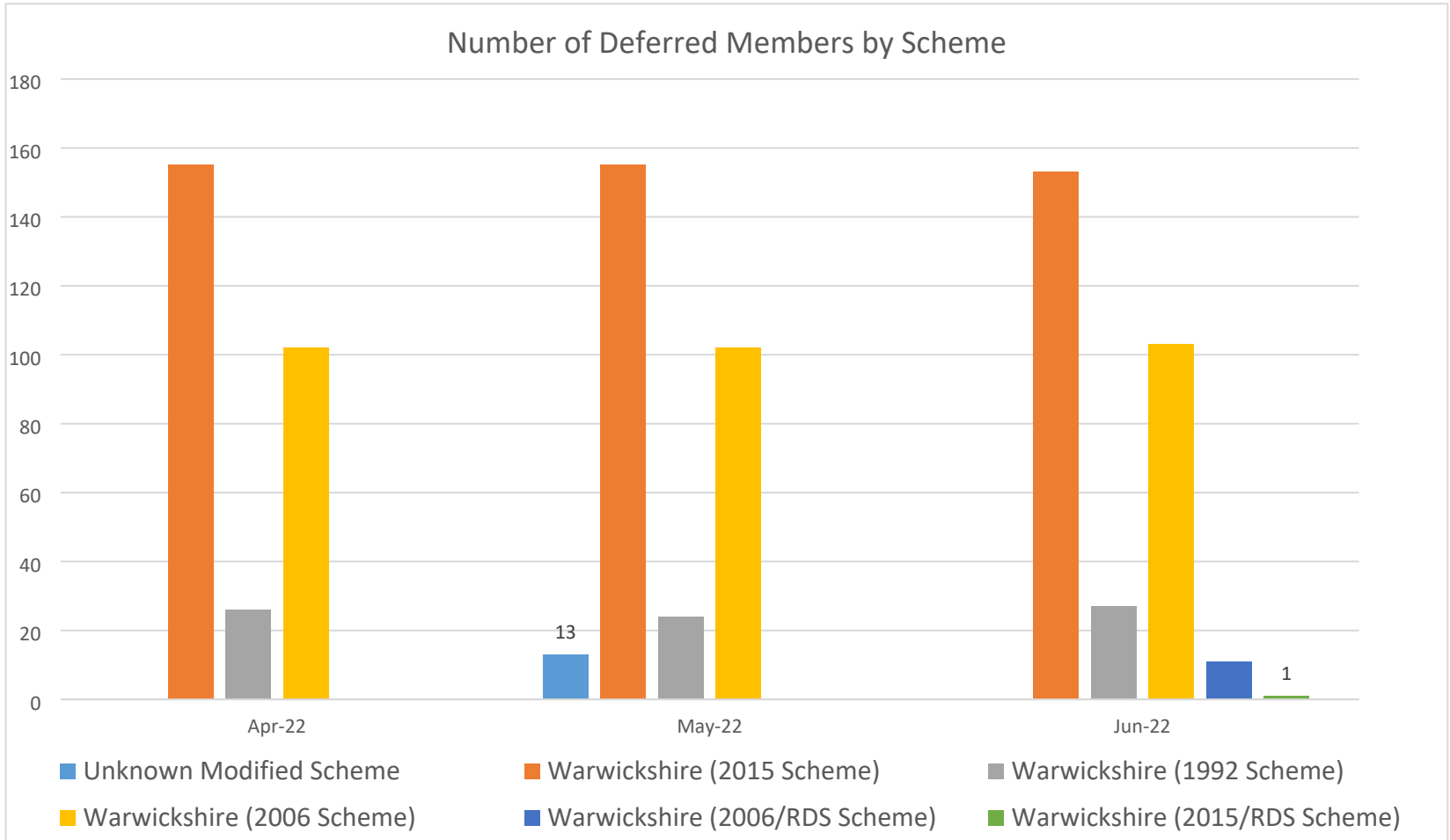
January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's Life Certificates Pensioner Newsletter
May	June	July	August
Life Certificates	Active Newsletter Life Certificates Issue Deferred Annual Benefits Statements	Life Certificates Issue Deferred Annual Benefits Statements Issue active Annual Benefits Statements	Issue active Annual Benefits Statements Life Certificates
September	October	November	December
Pension Estimates Assumption Exercise Life Certificates Pension Savings Statement	Life Certificates Participate in NFI tPR Scheme Returns	tPR Annual Survey Life Certificates	IAS19 Data capture exercise for Actuaries Life Certificates

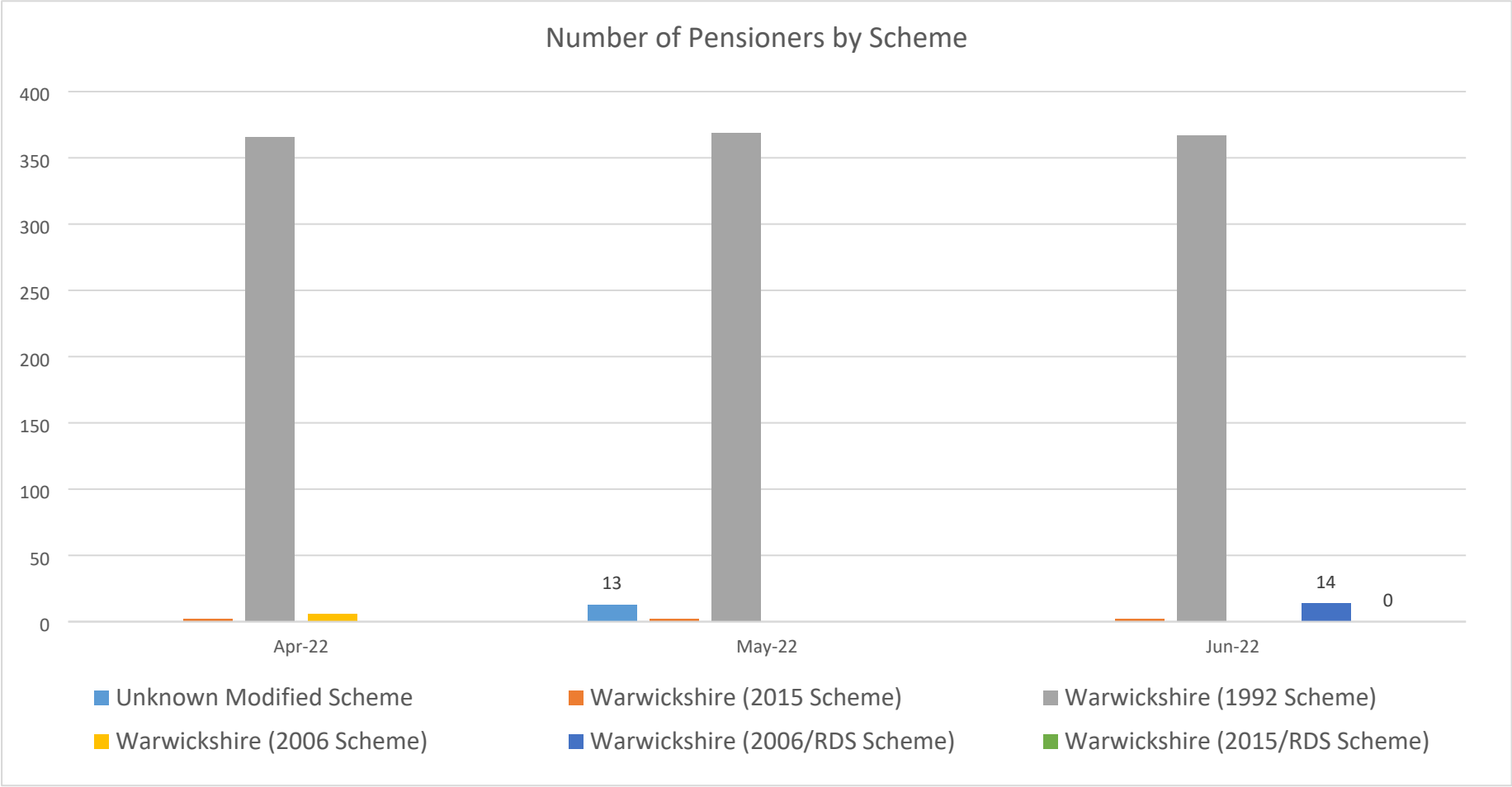
## 9.Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Warwickshire (1992 Scheme)	0	27	367	57	0	0
Warwickshire (2006 Scheme)	0	103	0	1	2	1
Warwickshire (2006/RDS Scheme)	0	11	14	0	0	0
Warwickshire (2015 Scheme)	383	153	2	0	3	0
Warwickshire (2015/RDS Scheme)	3	1	0	0	0	0









## 10.Five Year Audit Plan 2019 – 2024

West Yorkshire Pension Fund Five Year Audit Plan 2019 - 2024	Frequency	Last Audit	Recommendations	Days	19/20	20/21	21/22	22/23	23/24	Total
Annual Accounts Verification	Annual	Jul 18	1	10	✓	✓	✓	✓	✓	
<b>Audits Per Year</b>					<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>5</b>
<b>Benefits</b>										
Local Government Scheme Contributions	2 Yearly	Nov 18	0	20			✓		✓	
New Pensions and Lump Sums - WYPF										
- Normal and Early Retirements	5 Yearly	Mar 15	0	25	✓					
- Death in Service, Post Retirement Widow and Dependent Benefits	5 Yearly	Mar 17	0	20			✓			
- Ill Health Pensions	5 Yearly	Oct 13	2	20					✓	
- Flexible Retirements	5 Yearly	Apr 16	1	20		✓				
- Deferred Pensions	5 Yearly	Mar 18	0	20				✓		
Transfers Out	3 Yearly	Nov 17	0	20		✓				
Transfers In	3 Yearly	Sep 16	2	20	✓		✓			
Reimbursement of Agency Payments	5 Yearly	Mar 18	2	15				✓		
Life Certificates	5 Yearly	Oct 15	0	15		✓				
AVC Arrangements	5 Yearly	Sep 17	0	15				✓		
Admission of New Bodies	5 Yearly	Jan 15	0	20	✓					
Pensioners Payroll	2.5 years	Mar 16	3	20		✓			✓	
Purchase of Additional Pension	5 Yearly	Mar 17	1	15			✓			
Annual Benefits Statements	2.5 years	Oct 16	0	20	✓			✓		
New Pensions and Lump Sums - Fire Service	3 Yearly	Jul 18	1	15		✓			✓	
<b>Audits Per Year</b>					<b>4</b>	<b>5</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>21</b>

## 11. Overriding Disclosure Time Limits

<b>Disclosure Requirement</b>	<b>Time Limit</b>	<b>Number of breaches in month</b>
Material alterations to basic scheme information	Within 3 months of the change taking effect	0
Transfer Credits (quote)	Within 2 months	0
Annual Benefit Statements	By 31 August each year	0
Annual Benefit Statement (upon request)	Within 2 months of request, if not already provided within previous 12 months	0
Deferred Benefit Statements	By 31 August each year	0
Deferred Benefit Statement (upon request)	Within 2 months of request, if not already provided within previous 12 months	0
Pension Savings Statements	By 6 October each year	0
Cash Equivalent Transfer Value Out	Within 3 months of request	0
Accessing Benefits before Normal Pension Age	2 month of benefits becoming payable	0
Accessing Benefits on or after Normal Pension Age	1 month of benefits becoming payable	0
Notification of Deferred Benefit entitlement	2 months of being notified of leaver	0



## Divorce Time limits

Type of request	Time limit	Number of breaches in month
Request for divorce information only.	3 months from receipt of the request.	0
Request for divorce information where you are notified that the information is required in connection with divorce proceedings that have already commenced.	6 weeks from receipt of the request.	0
Request for divorce information where a Court Order imposes a deadline.	Within the deadline specified by the Court.	0
Request for divorce information where you are notified that a Pension Sharing Order may be issued.	Within 21 days of receiving notification that a Pension Sharing Order may be issued or a date outside 21 days as specified by the Court.	0
Where the request is for information which does not include a Cash Equivalent Transfer Value	1 month from receipt of the request.	0
Pension Sharing Order received but some information* and/or charges are still outstanding.	A letter to both parties needs to be sent out within 21 days of receiving the Order to explain the Order cannot be implemented and request the missing information and/or charges.	0
Pension Sharing Order received including all relevant information* and charges.	A letter** must be sent to both parties within 21 days of the start of the implementation period notifying them of the deadline.	0
Pension Sharing Order Received including all relevant information and charges.	4 months to implement the Order of the date of receipt of the final information which allows calculation	0
PSO has been implemented.	A letter* must be sent to both parties within 21 days of implementing the PSO to notify both parties their entitlement.	0

This page is intentionally left blank

# Monthly Report

July 2022

Warwickshire Fire Authority



Prepared by:

**Matt Mott**

Governance and Business Development Manager

Mobile: 07815 476877

Email: [matt.mott@wypf.org.uk](mailto:matt.mott@wypf.org.uk)

West Yorkshire Pension Fund  
Aldermanbury House  
4 Godwin Street  
Bradford  
BD1 2ST

[www.wypf.org.uk](http://www.wypf.org.uk)

Follow WYPF on Twitter [www.twitter.com/wypf\\_lgps](https://www.twitter.com/wypf_lgps)

Follow WYPF on Facebook [www.facebook.com/westyorkshirepensionfund](https://www.facebook.com/westyorkshirepensionfund)



# Contents

1 Regulations/Fire Scheme Update .....	4
2 Member Update .....	8
3 Administration Update .....	9
4 Communication & Training .....	9
5 IT Update .....	10
6 Key performance Indicators .....	11
7 Work in progress .....	12
8 Member web registrations .....	13
9 Calendar of Events.....	14
10 Membership Numbers.....	15
11 Five Year Audit Plan .....	19
12 Overriding Disclosure Time Limits .....	20

## 1.0 Regulations/Fire Scheme Update

Please take a few minutes to read the Firefighters' Pension (England) Scheme Advisory Board Bulletin (Link to Bulletin below) and take any action required.

[FPS Bulletin 58 - June 2022 \(fpsregs.org\)](https://www.fpsregs.org/)

### FPS

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

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

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

The deadline for submissions is Friday 19 August 2022. FRAs are also required to complete the Excel table at [Appendix 2](#) in order to declare the local assumptions that they have applied to calculate their pension estimates. The prescribed assumptions that FRAs should use for CPI percentage increases, pay increases and employer contribution rates for the forecasting period have already been pre-populated on the table.

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

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

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

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

#### Matthews – Lessons Learned

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

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

Matthews Remedy options exercise which took place between April 2014 and September 2015.

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

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

### **Immediate Detriment Framework costing and assumption guidance**

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

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

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

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

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

### **Bluelight inbox and query form**

Now that the Bluelight team is up to full strength please can we ask that all queries are sent to the generic Bluelight inbox ([bluelightpensions@local.gov.uk](mailto:bluelightpensions@local.gov.uk)). This will

enable the most appropriate team member to respond as well as ensuring that queries can be dealt with when someone is on leave.

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

- Details of your query
- Area of uncertainty / challenge
- Proposed solution
- Research undertaken: Relevant legislation, HMRC guidance, relevant websites, historical background (circulars or technical meeting minutes), legal advice [Include links]
- Indication of amounts (£) involved
- Timescales involved
- Other supporting evidence Receiving queries in this way allows us to build up a picture of frequently asked questions and ensure greater consistency in our responses.

We can build up a knowledge bank of resources and be able to more easily identify common areas of uncertainty, where dedicated training or workshops could be offered.

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

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

### **Annual Benefit Statements 2022 – Information factsheet**

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

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



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

## FPS England SAB updates

### SAB respond to HM Treasury's letter

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

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

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

## Other News and Updates

### Further consultation on Pensions Dashboards launched

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

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

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

The DAP is the point at which dashboards will be available to all members of the public. The consultation proposes that the DWP will decide on the DAP and then give pension schemes 90 days' notice. It is hoped that this will give schemes sufficient time to make final preparations. The consultation is scheduled to run for 3 weeks and closes on 19 July 2022.

## Events

### FPS coffee mornings

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

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

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

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

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

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

## Legislation

### 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](#)

## 2. Member Update

None

### 3. Administration Update

#### Preparing for year-end

As we are now some time past March some clients have now submitted their month 12 file.

To date WYPF have only processed approximately half of clients as the data has been received late or not at all.

If you haven't submitted month 12 please do so as a matter of urgency or if you are experiencing issues this is delaying your return, please contact WYPF immediately.

Remember, month 12 posting is key to important statutory duties undertaken by WYPF (such as annual benefit statements and pension saving statements).

#### Annual benefit statements (ABS)

Development of this year's ABS and accompanying web notes has been a priority in June for WYPF.

Whilst further information on annual ABS will be provided over the coming weeks, we wanted to confirm that the recently produced LGA factsheet mentioned in bulletin 58 will be included with this year's ABS.

### 4. Communication & Training

#### Communications

The member pages of WYPF website ([wypf.org.uk/firefighters](http://wypf.org.uk/firefighters)) have been updated to reflect that active members are all now in the 2015 with effect from 1 April 2022.

Information about the legacy schemes has been reduced with signposting added pointing members back to the national site for information about 1992/2006 schemes: [www.wypf.org.uk/firefighters/legacy-fire-pension-schemes/](http://www.wypf.org.uk/firefighters/legacy-fire-pension-schemes/)

The Fire client satisfaction survey was released during June and closes on Friday 8 July. Responses have to date been on the low side. It only takes a few minutes to complete, so please answer the survey and provide feedback on our service.

Member survey launched about WYPF websites and the My Pension portal. To achieve accuracy and impartiality an independent consultancy which specialises in this work, TLF Research, have been appointed to carry out the survey on our behalf.

The survey was launched in June and closes on Sunday 10 July and to date we've had over 3,500 responses across LGPS and Fire members.

### **Pre-retirement seminars attended by WYPF during June:**

7 June – WY FRA

13 June – Fire Comms Group

14 June – Staffs FRA

### **Pension boards**

6 June – Lincs Pension Board (am) and Warwickshire Pension Board (pm)

22 June – Devon & Somerset Pension Board

### **National meetings**

1 June – LGA in-person training with Team fire (worth mentioning perhaps)

23 & 24 June – Fire SAB meetings

**FRA training delivered by WYPF: None**

## **5. IT Update**

### **KPI Reporting**

All FRAs should have received a letter informing them about revised KPI reporting.

IT have developed a revised suite of KPI reports which measure the member's end to end experience. These KPIs are being reviewed and analysed over the course of the summer with an intention to include in the monthly client report with effect from the autumn.

## **BREAKING News**

On the 6 July it was announced the Fire Brigades Union (FBU) & British Medical Association (BMA) have been granted permission for a high Court Judicial Review against pensions proposals that would see younger members foot the bill for changes linked to the McCloud ruling.

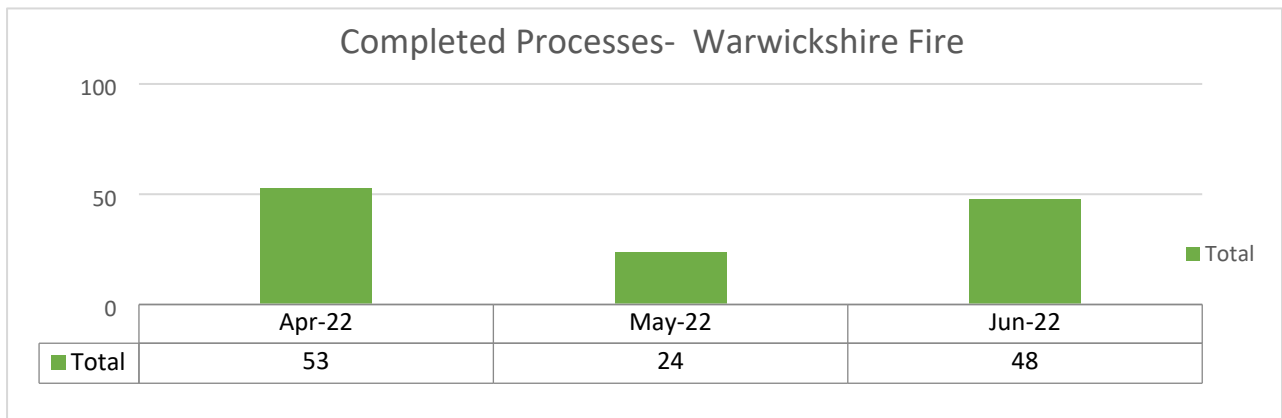
The two unions filed separate challenges to the government's proposals, but their claims will be heard together because they overlap.

FBU believe the cost should be funded by the Treasury and, if successful, could also have repercussions for other Public Service Pension Schemes.

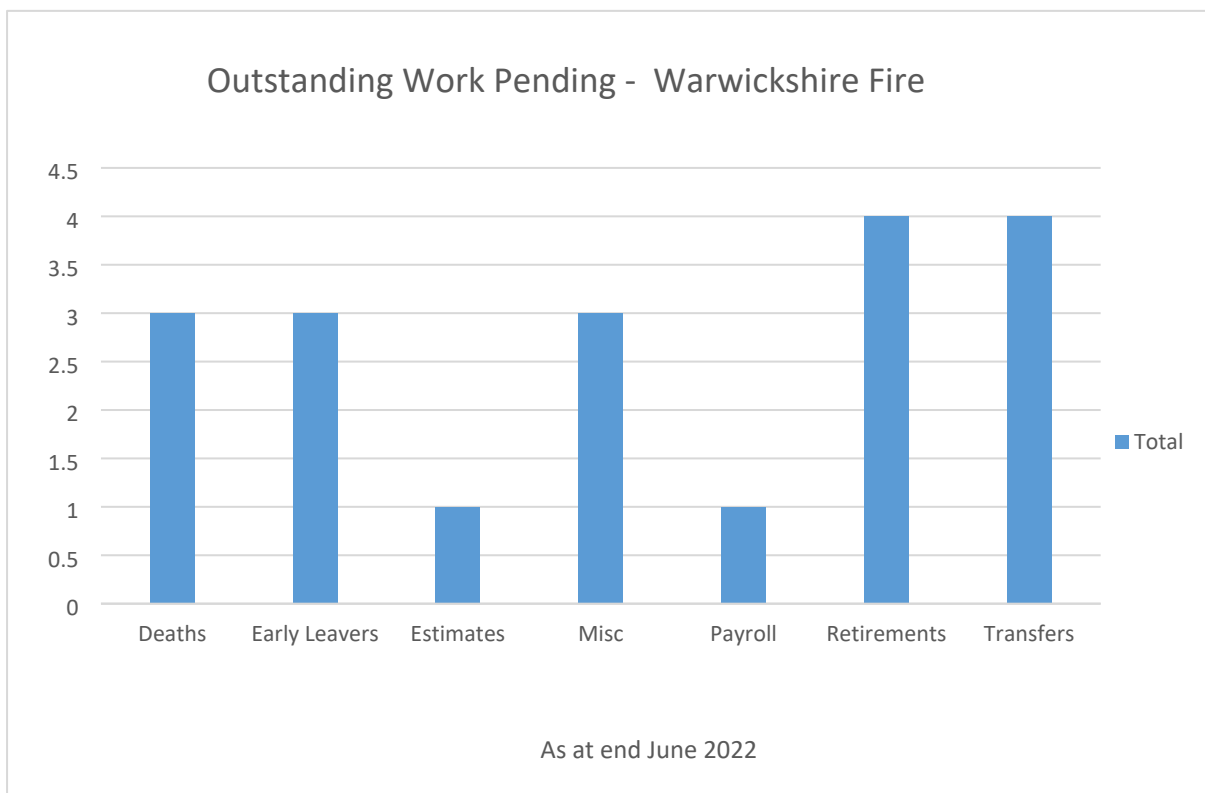
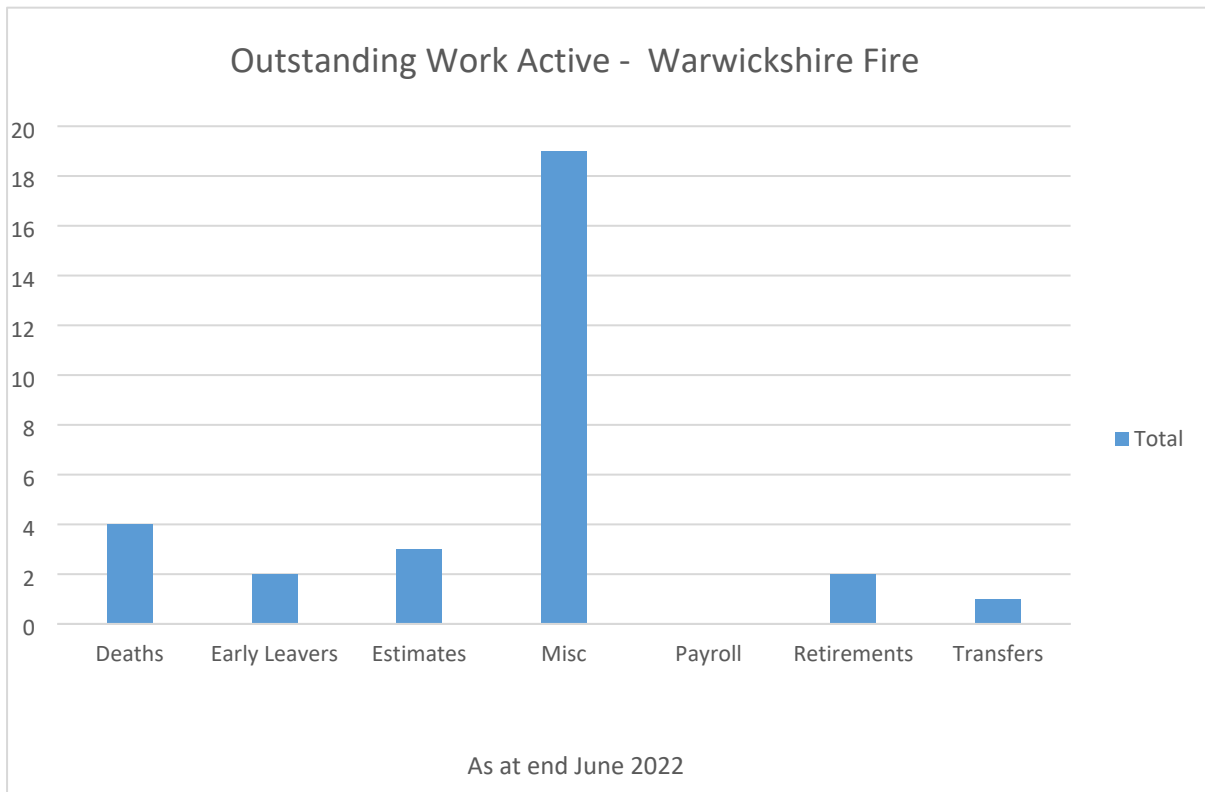
## 6.Key Performance Indicators

### Completed processes

Warwickshire Fire (1 to 30 June 2022)						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Deferred Benefits Set Up on Leaving	1	10	0	85	0	14
Pension Estimate	2	10	2	85	100	3.5
Change of Address	35	20	35	85	100	1
Change of Bank Details	2	20	2	85	100	6
General Payroll Changes	2	20	2	85	100	1
Death Grant Nomination Form Received	5	20	4	85	80	15.2
Update Member Details	1	20	1	100	100	1
Monthly Pension	435	Pay date	435	100	100	



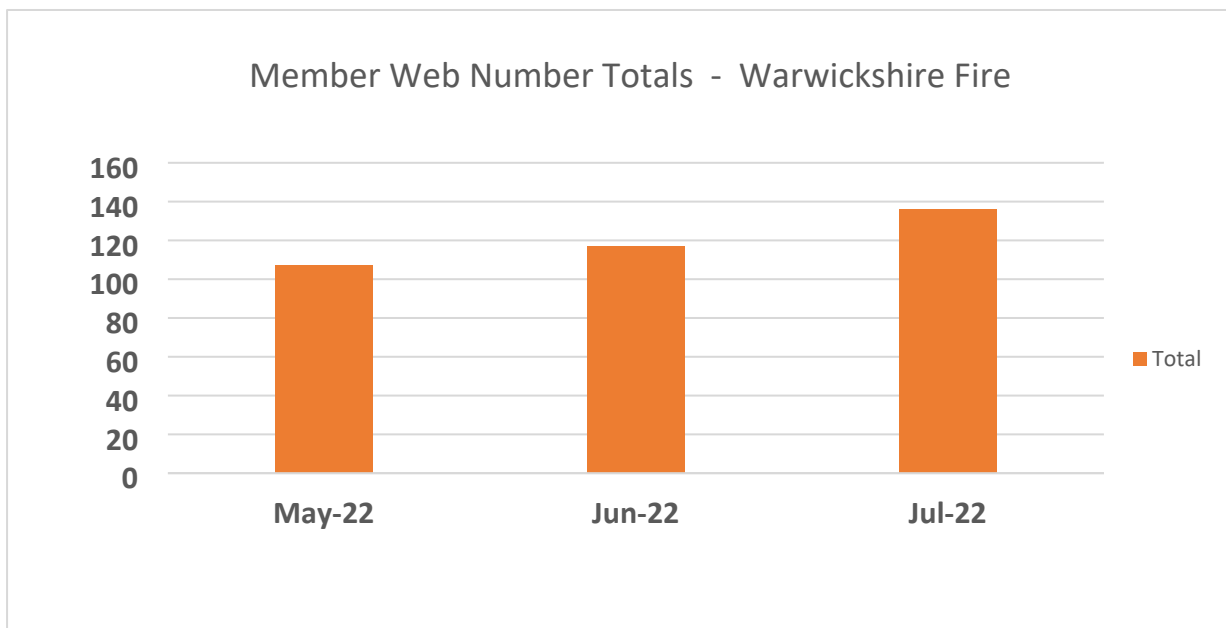
## 7. Work in Progress



## 8.Member Web Registrations

The number of members signed up to member web are:

Status	Number
Active	33
Pensioner	83
Pensioner Ex-Spouse	0
Beneficiary Pensioner	5
Deferred Ex-Spouse	0
Deferred	15



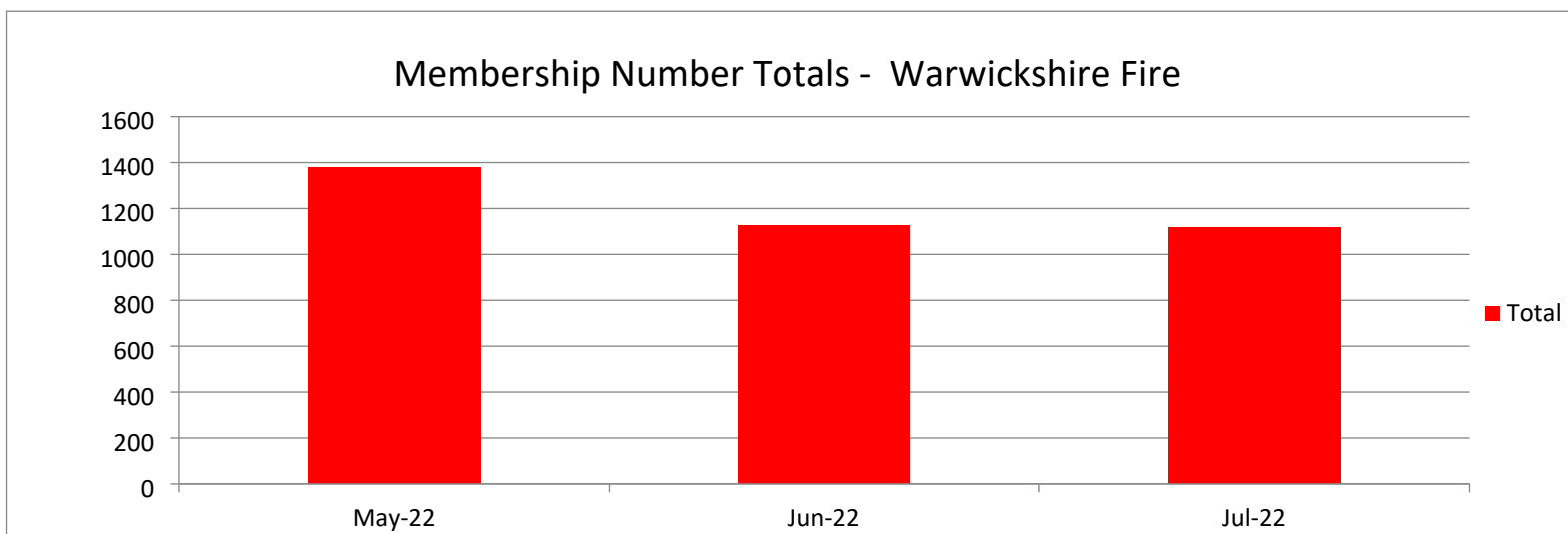
## 9. Calendar of Events

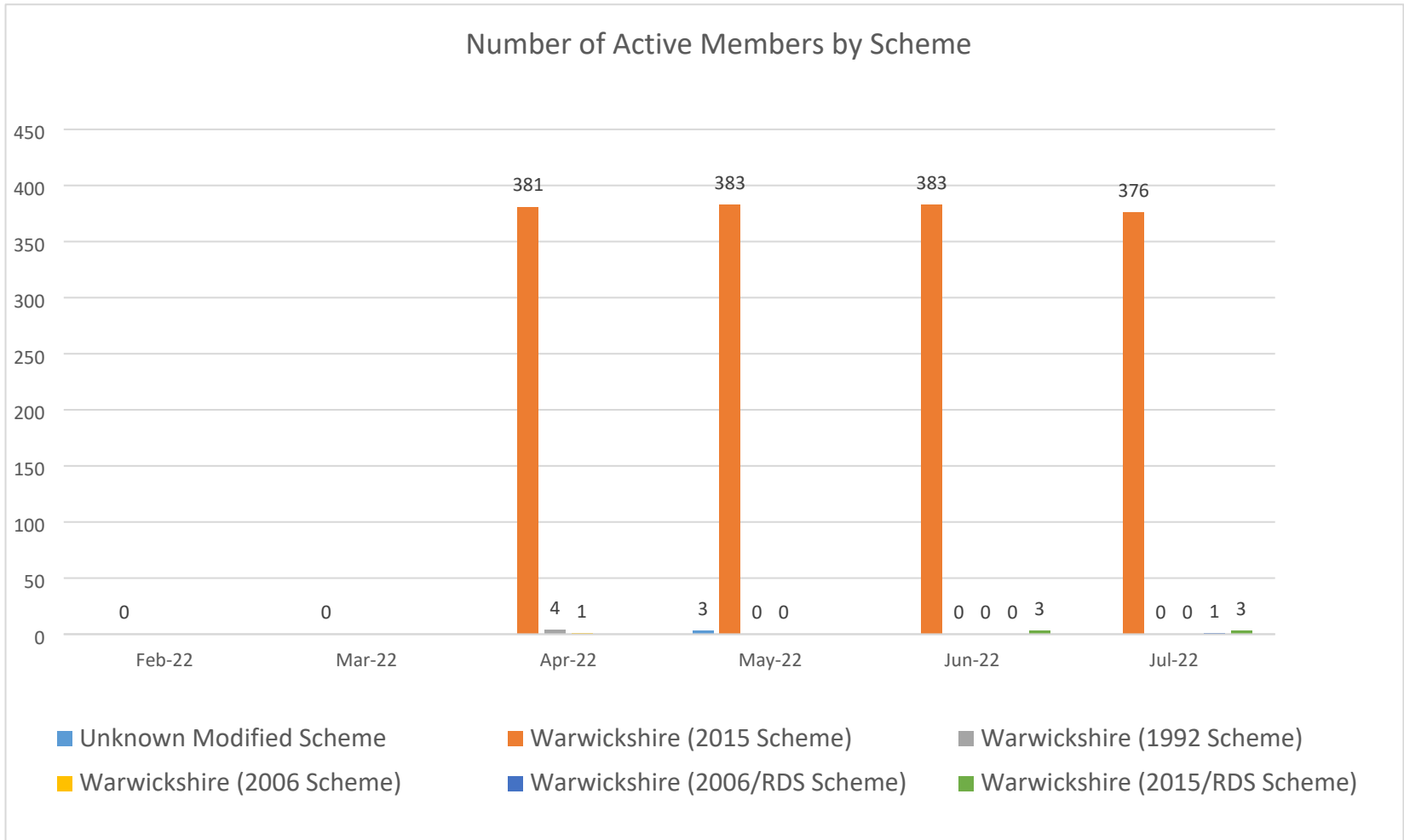
January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's Life Certificates Pensioner Newsletter
May	June	July	August
Life Certificates	Active Newsletter Life Certificates Issue Deferred Annual Benefits Statements	Life Certificates Issue Deferred Annual Benefits Statements Issue active Annual Benefits Statements	Issue active Annual Benefits Statements Life Certificates
September	October	November	December
Pension Estimates Assumption Exercise Life Certificates Pension Savings Statement	Life Certificates Participate in NFI tPR Scheme Returns	tPR Annual Survey Life Certificates	IAS19 Data capture exercise for Actuaries Life Certificates

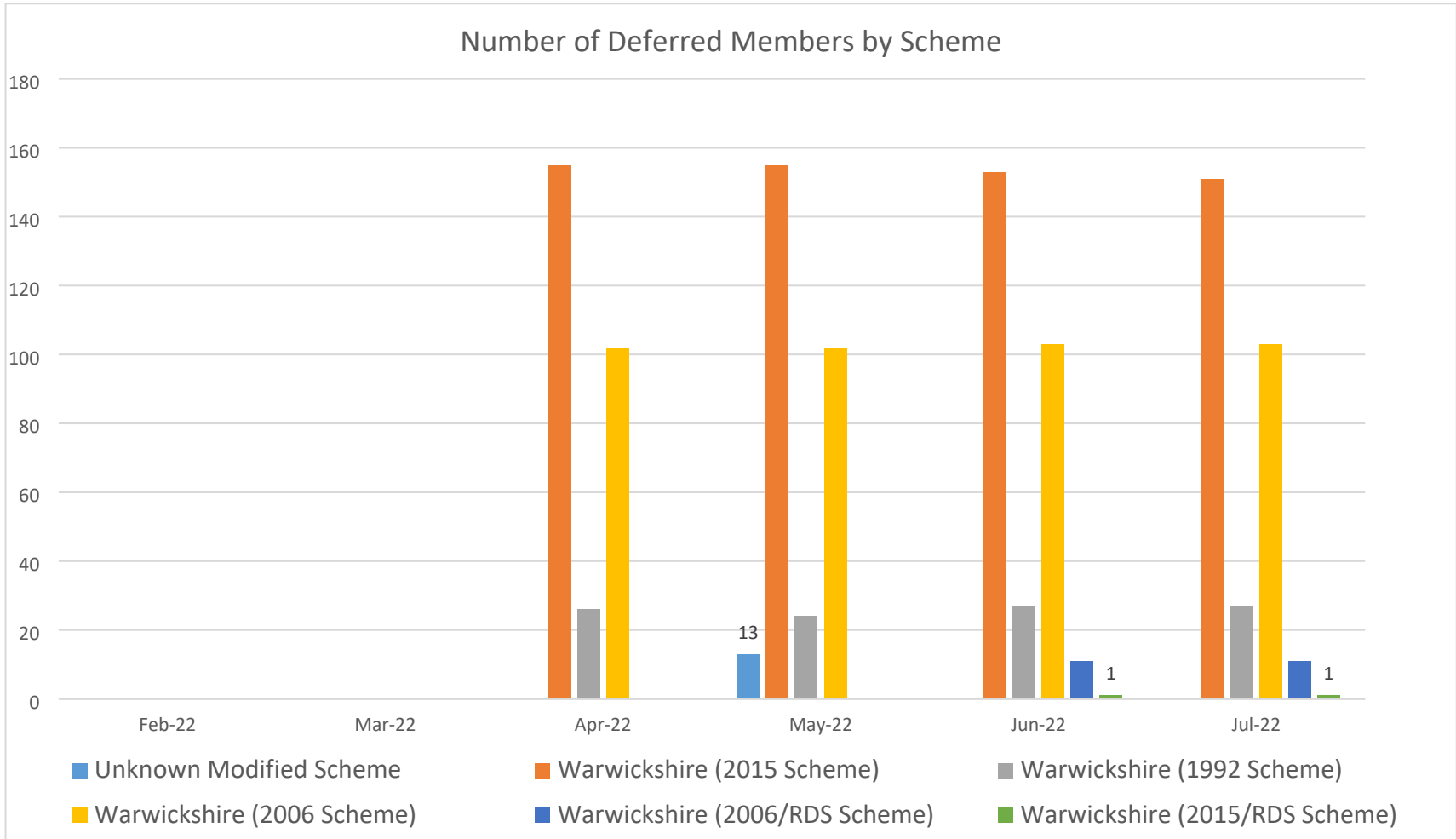


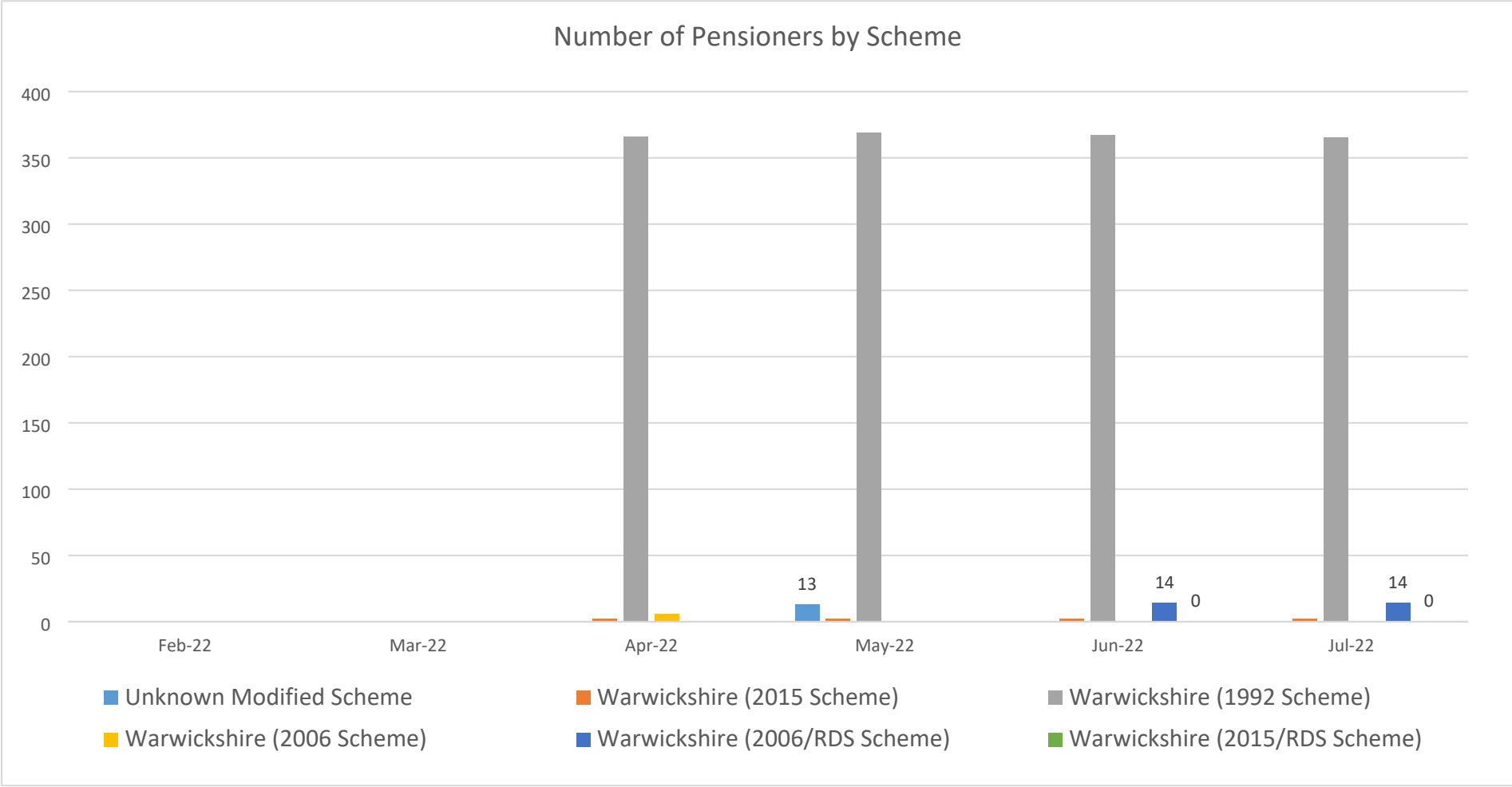
## 10.Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Warwickshire (1992 Scheme)	0	27	365	56	0	0
Warwickshire (2006 Scheme)	0	103	0	1	2	1
Warwickshire (2006/RDS Scheme)	1	11	14	0	0	0
Warwickshire (2015 Scheme)	376	151	2	0	3	0
Warwickshire (2015/RDS Scheme)	3	1	0	0	0	0









## 11.Five Year Audit Plan 2019 – 2024

West Yorkshire Pension Fund Five Year Audit Plan 2019 - 2024	Frequency	Last Audit	Recommendations	Days	19/20	20/21	21/22	22/23	23/24	Total
Annual Accounts Verification	Annual	Jul 18	1	10	✓	✓	✓	✓	✓	
<b>Audits Per Year</b>					<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>5</b>
<b>Benefits</b>										
Local Government Scheme Contributions	2 Yearly	Nov 18	0	20			✓		✓	
New Pensions and Lump Sums - WYPF										
- Normal and Early Retirements	5 Yearly	Mar 15	0	25	✓					
- Death in Service, Post Retirement Widow and Dependent Benefits	5 Yearly	Mar 17	0	20			✓			
- Ill Health Pensions	5 Yearly	Oct 13	2	20					✓	
- Flexible Retirements	5 Yearly	Apr 16	1	20		✓				
- Deferred Pensions	5 Yearly	Mar 18	0	20				✓		
Transfers Out	3 Yearly	Nov 17	0	20		✓				
Transfers In	3 Yearly	Sep 16	2	20	✓		✓			
Reimbursement of Agency Payments	5 Yearly	Mar 18	2	15				✓		
Life Certificates	5 Yearly	Oct 15	0	15		✓				
AVC Arrangements	5 Yearly	Sep 17	0	15				✓		
Admission of New Bodies	5 Yearly	Jan 15	0	20	✓					
Pensioners Payroll	2.5 years	Mar 16	3	20		✓			✓	
Purchase of Additional Pension	5 Yearly	Mar 17	1	15			✓			
Annual Benefits Statements	2.5 years	Oct 16	0	20	✓			✓		
New Pensions and Lump Sums - Fire Service	3 Yearly	Jul 18	1	15		✓			✓	
<b>Audits Per Year</b>					<b>4</b>	<b>5</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>21</b>

## 12. Overriding Disclosure Time Limits

<b>Disclosure Requirement</b>	<b>Time Limit</b>	<b>Number of breaches in month</b>
Material alterations to basic scheme information	Within 3 months of the change taking effect	0
Transfer Credits (quote)	Within 2 months	0
Annual Benefit Statements	By 31 August each year	0
Annual Benefit Statement (upon request)	Within 2 months of request, if not already provided within previous 12 months	0
Deferred Benefit Statements	By 31 August each year	0
Deferred Benefit Statement (upon request)	Within 2 months of request, if not already provided within previous 12 months	0
Pension Savings Statements	By 6 October each year	0
Cash Equivalent Transfer Value Out	Within 3 months of request	0
Accessing Benefits before Normal Pension Age	2 month of benefits becoming payable	0
Accessing Benefits on or after Normal Pension Age	1 month of benefits becoming payable	0
Notification of Deferred Benefit entitlement	2 months of being notified of leaver	0

## Divorce Time limits

Type of request	Time limit	Number of breaches in month
Request for divorce information only.	3 months from receipt of the request.	0
Request for divorce information where you are notified that the information is required in connection with divorce proceedings that have already commenced.	6 weeks from receipt of the request.	0
Request for divorce information where a Court Order imposes a deadline.	Within the deadline specified by the Court.	0
Request for divorce information where you are notified that a Pension Sharing Order may be issued.	Within 21 days of receiving notification that a Pension Sharing Order may be issued or a date outside 21 days as specified by the Court.	0
Where the request is for information which does not include a Cash Equivalent Transfer Value	1 month from receipt of the request.	0
Pension Sharing Order received but some information* and/or charges are still outstanding.	A letter to both parties needs to be sent out within 21 days of receiving the Order to explain the Order cannot be implemented and request the missing information and/or charges.	0
Pension Sharing Order received including all relevant information* and charges.	A letter** must be sent to both parties within 21 days of the start of the implementation period notifying them of the deadline.	0
Pension Sharing Order Received including all relevant information and charges.	4 months to implement the Order of the date of receipt of the final information which allows calculation	0
PSO has been implemented.	A letter* must be sent to both parties within 21 days of implementing the PSO to notify both parties their entitlement.	0

This page is intentionally left blank



## Warwickshire Fire and Rescue Local Pension Board of the Firefighters' Pension Scheme

13 September 2022

### Regulatory and Policy Update

#### Recommendations

That the Warwickshire Fire and Rescue Local Pension Board of the Firefighters' Pension Scheme

1. notes and comments on the information included in this report.
2. endorses the decision regarding the payment of Category 1 cases in relation to immediate detriment as set out in paragraph [ 1.10 ] below.

#### 1. Policy update

- 1.1 **Abatement Policy** – Following a decision regarding the application of abatement to a retired firefighter who was re-employed by the service, the Abatement Policy has been reviewed and amended.
- 1.2 The decision concluded that in the previous version of the policy the wording amounted to a blanket policy which stipulated abatement would apply. This meant that there was no room for 'discussion' in terms of the circumstances in which abatement would not apply.
- 1.3 The policy is being updated to reflect that only in exceptional circumstances would abatement not apply, and that WFRS would need to show on a case-by-case basis that consideration was given as to whether any exceptional circumstances existed.
- 1.4 We are waiting for clarification from LGA regarding how abatement applies to transitional members ( being those members who have pensions built up in both a final salary scheme (1992/2006) and 2015 scheme). This is because all members moved across to the 2015 Scheme from 1<sup>st</sup> April 2022. Abatement does not apply in the 2015 scheme.
- 1.5 The Policy will go to Staff and Pensions Committee in December.
- 1.6 **Immediate Detriment** - Following advice from the National Fire Chiefs Council (NFCC), in June 2022 Immediate Detriment payments were paused due to the risk that certain costs incurred would not be reimbursed by the government.

- 1.7 Despite the Home Office issuing informal guidance in August 2020 regarding the payment of immediate detriment cases, this was then withdrawn on 28 November 2021. There is currently no statutory guidance which stipulates how fire authorities are to treat immediate detriment cases.
- 1.8 An increasing number of legal challenges are now being received by FRAs. Because of this a further decision has been required on whether to re-instate payment of benefits or to continue to pause payment of all future immediate detriment cases until the legislation comes into full effect (the “Interim Period”), expected in October 2023.
- 1.9 The Local Government Association (LGA) released a calculator in June which provides an estimate of the additional costs relating to Category 1 and 2 cases; these are the costs that may not be re-imbursed by government. This has been used to establish the approximate additional cost (£130k) for potential retirements between now and October 2023.
- 1.10 On 19<sup>th</sup> July Corporate Board made the decision to un-pause the payment of Category 1 cases.

## Regulation Update

- 1.11 **Matthews – 2<sup>nd</sup> retained exercise** - The Home Office has recently shared a draft document which outlines the lessons learned from the first special members’ options exercise. This high-level paper has been produced for stakeholders involved in Matthews Remedy work. The purpose of this paper is to identify the areas of improvement from the previous remedy project and how to implement the lessons identified. The lessons referenced are drawn from the experience and reflections of the Home Office, Government Actuary Department and Local Government Association on Matthews Remedy options exercise, which took place between April 2014 and September 2015.
- 1.12 **Immediate Detriment** - The chair of the SAB had written an open letter to HM Treasury (HMT) on the withdrawal of the Home Office informal guidance on Immediate Detriment. The letter, dated 17 December 2021, asked for more information on the risks and uncertainties which HMT said arose as a result of processing cases ahead of legislation. On 23 March 2022, HMT provided a response outlining the factors behind the withdrawal in more detail. The response highlighted that Section 61 of the Equality Act 2010 did not, in HMT’s opinion, allow for amendment of a member’s tax position. The response detailed several tax complexities which had been identified and will be dealt with through legislation. On 20 June 2022, the chair of the SAB wrote an open letter in response to HMT’s reply which seeks further clarity on the extent of Sections 61/ 62 and the tax implications detailed.
- 1.13 **Age Discrimination Remedy (McCloud/Sargeant)** - A paper on contingent decisions was discussed at SAB meeting in June 2022. This highlights instances where a contingent decision may apply. Police and Fire SABs are involved in joint engagement sessions with the Home Office to discuss the policy definition documents (PDDs) in relation to remedy.

<https://www.fpsboard.org/images/PDF/Meetings/23-June-2022/Paper-1-Contingent-decisions.pdf>

- 1.14 **Judicial review granted over McCloud cost remedy** - Unions across the public sector sought a judicial review against the UK Government about McCloud/ Sargeant remedy costs in the cost control mechanism. The FBU, GMB, and British Medical Association (BMA) argued that the cost of rectifying the discrimination should not be met by scheme members. On 4 July 2022, the FBU and the BMA were given permission to judicially review the Government's decision.

## 2 Financial Implications

- 2.1 Financial implications are included in the body of the report.

## 3. Environmental Implications

None

## 4. Timescales associated with the decision and next steps

None

## Appendices

None

## Background Papers

1. Contingent Decisions paper - <https://www.fpsboard.org/images/PDF/Meetings/23-June-2022/Paper-1-Contingent-decisions.pdf>.

	<b>Name</b>	<b>Contact Information</b>
Report Author	Martin Griffiths, Victoria Jenks	martingriffiths@warwickshire.gov.uk, vickyjenks@warwickshire.gov.uk
Assistant Director	Andrew Felton Assistant Director Finance	andrewfelton@warwickshire.gov.uk
Strategic Director	Strategic Director for Resources	robpowell@warwickshire.gov.uk
Portfolio Holder	Portfolio Holder for Finance and Property	peterbutling@warwickshire.gov.uk

The report was circulated to the following members prior to publication:

Local Member(s): None

Other members: None

## **Warwickshire Fire and Rescue Local Pension Board of the Firefighters' Pension Scheme**

**13 September 2022**

### **Risk Monitoring**

#### **Recommendation**

That the Board note and comment on the report and the attached risk register.

#### **1. Executive Summary**

- 1.1 The Pensions Administration Service (PAS) maintains a risk register in order to manage the risks facing the administration of the Firefighters Pension Schemes.

#### **2. Financial Implications**

- 2.1 None

#### **3. Environmental Implications**

- 3.1 None

#### **4. Supporting Information**

- 4.1 The risk register has been updated and changes have been indicated by use of red text in the document.
- Removal of reference to COVID-19
  - Increase in risk level for data quality following issue with data match exercise undertaken by West Yorkshire Pension Fund

## 5. Timescales associated with the decision and next steps

- 5.1 The risk register will continue to be reviewed on a regular basis and reported to the board.

### Appendices

1. Appendix 1- Impact scores
2. Appendix 2 – Risk Register

### Background Papers

1. None

	<b>Name</b>	<b>Contact Information</b>
Report Author	Martin Griffiths, Victoria Jenks	martingriffiths@warwickshire.gov.uk, vickyjenks@warwickshire.gov.uk
Assistant Director	Andrew Felton	andyfelton@warwickshire.gov.uk
Strategic Director	Strategic Director for Resources	Robpowell@warwickshire.gov.uk
Portfolio Holder	Portfolio Holder for Finance and Property	peterbutlin@warwickshire.gov.uk

The report was circulated to the following members prior to publication:

Local Member(s): None

Other members: None

1. Risk Assessment Criteria				
Score	Description	Probability of Occurrence	Likelihood of Occurrence	
1	Highly Unlikely	The event may occur in only rare circumstances (remote chance)	1 in 8+ years	<p>The heatmap shows risk scores from 2 to 30. Catastrophic impact (rows 4-5) has scores 10-30. Major impact (row 3) has scores 8-24. Moderate impact (row 2) has scores 6-18. Minor impact (row 1) has scores 4-12. Insignificant impact (row 0) has scores 2-6.</p>
2	Unlikely	The event may occur in certain circumstances (unlikely chance)	1 in 4-7 years	
3	Possible	The event may occur (realistic chance)	1 in 2-3 years	
4	Probable	The event will probably occur (significant chance)	1 in 1-2 years	
5	Very Likely	The event is expected to occur or occurs regularly	Up to 1 in every year	

Score	Description	Members and Employers	Investments and Funding	Administration
1	Insignificant	Negligible impact - not noticeable by members or employers, no complaints or issues likely to be raised by members or employers. Example - Member or employer communication newsletter issued a few days later than planned.	Negligible impact - of a level that would not register for investment action. Example - Normal volatility levels being experienced in the investment portfolio.	Negligible impact - low level administrative issues resolved internally with no impact on key performance indicators Example - A manageable backlog of data to be uploaded to the administration system that has no impact on actual member payments.
2	Minor	Minor impact on members and/or employers which may cause correspondence about issues that can be resolved at source. Example - A member not being given the correct information first time when corresponding with the Fund and this having to be corrected, but having no impact on benefits paid	Minor impact on investment operations requiring monitoring and attention but not requiring anything other than business as usual actions. Example - minor adverse fund investment event, such as a credit default within a private credit portfolio which is of a business as usual nature.	Minor impact on administration performance requiring action within business as usual parameters. Example - an employer experiencing persist difficulty in providing correct data resulting in the need for extra training/support/correspondence to resolve
3	Moderate	Material adverse impact on members or employers that is of cause for concern to them and the Fund and requires escalation for non-business as usual resolutions More likely to be isolated issues but could have some scale. Example - Inability to finalise and sign off an admission agreement with a new employer resulting in escalation.	Material impact requiring bespoke corrective action, but manageable within the existing Investment Strategy Examples - Significant drift or step change in actual in asset allocation taking the Fund risk profile out of tolerances, or significant slippage in the implementation of a significant Fund transfer	Material impact on administration performance, but manageable within approved policies and procedures. Examples - Inability to agree a transfer of membership and liabilities from another fund, requiring arbitration by a third party, or disappointing data quality scores resulting in a need for an improvement plan.
4	Major	Significant adverse impact on members or employers that result in a direct impact on benefits paid or contributions due or member or employer satisfaction with Fund performance. Likely to result in complaints. More likely to be systemic issues. Examples - A significant delay in the issue of member annual benefit statements, or persistently charging an employer an incorrect contribution rate.	Major impact requiring significant corrective action and a change in Investmet Strategy or Funding Strategy, or the significant sale of assets under distress. May result in noticeable changes to employer contributions. Examples - Major change in the world economic outlook, or in the present value of future liabilities requiring a change in strategy, or inability to implement a significant Fund launch.	Major failure of administration function, likely to be systematic in nature, of a high profile nature to members and employers. Example - Widespread and persistent failure to meet key performance indicators such as dealing with certain types of administration query or action within deadlines, and receipt of significant numbers of complaints from members.
5	Catastrophic	Serious and systematic errors in benefits payments or administration KPIs, or significant volatility or increase in employer contributions. Significant breaches of the law Serious complaints and reputational harm caused Example - Systematic failure to monitor employer contributions resulting in subsequent identification of a large number of contribution deficits that employers cannot then catch up with.	Resulting in significant volatility or increase in employer contributions, inability to pay member benefits, or a need to significantly increase investment risk exposure. Significant failure to meet legal or regulatory requirements. Serious reputational harm caused Example - Catastrophic deterioration in the ability or employers to pay contributions resulting in a need for emergency investment and cashflow measures in order to keep paying benefits.	Catastrophic failure of administration function leading to inability to pay benefits accurately or at all on a large scale. Significant breaches of the law Serious complaints and reputational harm caused Example - Wholesale failure of the pension payroll function resulting in no member payments being made.

Risk	Risk Score (min)	Description
Low	0.1	Effective • Controls well understood and diligently implemented • No other controls considered necessary, ongoing monitoring only
Medium	7	Average • Controls understood but further improvements / implementation required • Controls can be improved to improve proactivity and continuous improvement

This page is intentionally left blank



**FIRE PENSIONS OUTSOURCING - RISK SHARING PROPOSAL**

Aug-22

Risk Identification						Inherent Risk Scoring			Existing Risk Controls		Residual Risk Scoring			Further Risk Controls	
Risk No.	Risk Description	Outsourcing Risk Allocation	Risk appetite	Risk Causes	Risk Consequences (Effect)	Likelihood	Impact	Risk Score	Control	Responsibility	Likelihood	Impact	Risk Score	Control	Responsibility
1	Covid- Pandemic (Administration and People Related)	Shared	Averse	Covid-19 pandemic (financial pressure on individuals and institutions, and more transactions being made online)	Members do not receive a high quality service	5	5	30	Office presence for processes that require it (e.g. physical post)	Both	3	3	12	Use of extraordinary committee or board meetings where necessary	WCC
				Further restrictive lockdowns	Business interruption				IT systems supporting remote and flexible working	Provider (Pensions system) WCC (Other feeder systems)				Continue to develop flexible and remote working practices	WCC
				Staffing capacity impacted by both short and long term health implications of infection	High costs in order to maintain service resilience				Flexible working policies for staff	WCC				Review electronic signatory processes	Both
					Staff health, wellbeing and productivity				Health and safety protocols for staff	Both					
					Impairment of the financial situation of employers				Policies that account for the scenario experienced	Both (e.g. business continuity)					
					Inability to make quick decisions in an emergency				Business continuity arrangements in place	Both					
					Non-payment of pensions				Ensure provider has satisfactory business continuity arrangements in place	WCC					
2	Inability to meet demand for activity	Provider	Averse	Taking on too many new customers / too quickly	Quality of services reduces	4	3	18	Medium term forecasting of demand and planning for the capacity and resources required	Provider	3	3	12		
				Growth in complexity	Governance failures				Investing in quality and productivity of staff through training and development	Provider					
				New and complex regulations (e.g. Sargeant (Age discrimination, Matthews retained Modified cases)	Key administration performance measures not met				Investing in systems development	Provider					
				Erosion of staff capacity/resilience due to long term remote working					Use of management information to monitor and manage performance	Provider					

				Inability to recruit / retain appropriately skilled staff					Succession planning arrangements are in place	Provider					
				Inability of the officers to keep up with demand (capacity or skills)					Data quality reviewed at least annually	Provider					
				Persistently increasing customer expectations											
				Unpopular government decisions impacting on Fire Pension Schemes											
3	Lack of capacity or competence to act as intelligent client and effective Scheme Manager	WCC	Averse	Outsourcing of delivery	<ul style="list-style-type: none"> <li>Quality of services reduces</li> </ul>	5	3	15	Medium term forecasting of demand and planning for the capacity and resources required	provider	2	3	9	Collaboration with other Fire Authorities using same provider for continuous improvement	WCC
				Growth in complexity	<ul style="list-style-type: none"> <li>Governance failures</li> </ul>				Investing in quality and productivity of staff through training and development	provider					
				New and complex regulations (e.g. Sargeant (Age discrimination, Miller retained Modified cases)	<ul style="list-style-type: none"> <li>Key administration performance measures not met</li> </ul>				Use of management information to monitor and manage performance	both					
				Erosion of staff capacity/resilience due to long term remote working					Succession planning	both					
				Inability to recruit / retain appropriately skilled staff					Data quality reviewed at least annually	WCC					
				Inability of the officers to keep up with demand (capacity or skills)					Maintain strong working relations with provider	WCC					
				Persistently increasing customer expectations											
				Unpopular government decisions impacting on Fire Pension Schemes											
4	Business interruption	Both	Averse	<b>Covid-19-Pandemic</b> (financial pressure on individuals and institutions, and more transactions being made online)	Delays in decisions or their implementation	3	4	16	Building resilience requirements into service contracts	Both	2	3	9	Implementation of Cyber Security policy	Both
				Industrial action	Failure to meet performance targets				Digital record keeping	Both				Review and update disaster recovery plan	Both
				Small specialist teams with single person risks	Reputational damage				Storing data back ups off site	Both					
				Significant changes in adviser and consultant personnel	Data quality deterioration				Maintaining close links with advisers, consultants, and external organisations	Both					
				Further high impact Covid events (e.g. infection waves, lockdowns)	Workload backlogs				Use of IT systems to work remotely	Both					

				Lack of systems maintenance	Significant restoration costs										
				Systems failure											
				Covid impact on staff											
				Disaster event - fire, flood, etc											
				Lack of remote working facilities											
5	Cyber security	Both	Averse	Systemic cybersecurity events (e.g. taking down financial trading institutions globally)	Loss of data and/or data disruption	4	5	25	Use of scheme administrator systems and system security	Both	3	4	16	Implementation of Cyber security policy	Both
				Local cyber security events (e.g. targeting the Council)	Reputational damage				Staff training	Both					
				Personal cyber security events (e.g. phishing emails targeting staff)	Breaches of the law				Bespoke Scheme cyber security policy	Both					
				Inadequate system security	Fines										
				Inadequate staff training and staff vigilance	Costs of fixing issues										
					Business interruption										
5	Data Quality	Both (WCC as data controller and provider as data processor)	Averse	McCloud/Sargeant impact	Incorrect benefit payments to scheme members	4	4	16	Review data quality and agree action plan to address issues highlighted	Both	3	2	9	Audit of data quality management arrangements	WCC
				Persistently increasing customer service expectations	Complaints and disputes from scheme members				SLA with Council payroll service	WCC					
				Covid impact on member health and wellbeing - increasing the adverse impact of any problems with pensions	Negative reputational impact				Maintenance of Scheme website and sign posting to the new LGA Fire Pension scheme members website	Both					
				Member benefits paid incorrectly	Breaches resulting in fines from tPR				Staff training	Both					
				Inadequate administration systems and processes					Performance monitoring of employer data quality	Both					
				Poor data provided by employer					Performance monitoring of administration team KPIs	Both					
				Data provided by previous administrator in consistent, with data on bith administration and pensioner payroll not matching	over/underpayment of pensions loss of reputation with stakeholders				reconciliation of data to be done on a regular basis to ensure consistency	WY				data matching exercise underway between admin and pensioner payroll to look at data transferred as at March 2022	WCC/WY
				Inadequate payroll services											

6	Fraud or corruption	Both	Averse	Poor application of controls by the Employer or Provider	Members lose benefits to fraudsters	4	3	15	Application of Authority code of conduct for officers, fraud strategy, and whistleblowing policy	Both	3	3	12	Fraud risk review in 2022/23	WCC
				Increased financial pressure on individuals due to Covid-19 geo political activity and its impact on the economy and jobs	Reputational risk				Application of division of duties and signatory processes for financial transactions and administration	Both					
				The passing of time since any previous targeted review of Fraud and corruption risk	Time spent unpicking the fraud				Periodic independent internal audit reviews of administration controls and activity	Both					
				Fraud or corruption instigated by any Fund stakeholders	Fraudulent members gain benefits they are not entitled to				Annual external audit reviews	Both					
					Breaches resulting in fines from tPR										
7	Governance Failure	Both	Averse	Lack of capacity to service governance requirements	Adverse impact on service reputation	3	4	16	Training needs analysis and plans for Committees and Board	WCC	2	3	9		
				Lack of training	Exposure to unplanned risks or poor administration				Training needs analysis and plans for staff	Both					
				Lack of continuity in staffing, advisers, or committee / board members	Breaches of the law				Quarterly committee and Board meeting cycles	WCC					
				Inadequate checking/review of standards compared to requirements and best practice	Poor decisions				Monthly meetings between Scheme Administrator and provider (moving to quarterly after 6 months)	Both					
				Complacency in light of recent governance improvements	Decisions that are not appropriately authorised				All training provision to be made available to all committee and Board members	WCC					
				Out of date policies and contracts	Customer dissatisfaction				Management of a policy schedule	Both					
				Local government elections impact on committee continuity	Incorrect benefit payments to scheme members				Use of digital technology - remote working and remote meetings	Both					
				Covid-19 Pandemic - impact on officer, adviser, and committee/board personnel health and availability					Responding to government consultations	Both					
Uncertainty around overall governance structure and responsibility for decision making and actions															
														Audit of governance arrangements	WCC
														Look at best practice to create training plan	Both

			Unpopular government decisions impacting on Fire Pension Schemes								
--	--	--	--	--	--	--	--	--	--	--	--

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank