

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

Date: Monday 7 November 2022

Time: 2.00 pm

Venue: Microsoft Teams

Membership

Martin Reohorn (Chair)

Barnaby Briggs

Caroline Jones

Sian Marsh

Paul Morley

Tony Morgan

Councillor Brian Hammersley

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 the Previous Meeting

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2. Risk Monitoring

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3. Pensions Administration Activity and Performance update

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4. Governance and Policy Update

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5. Forward Plan

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6. Chair's annual report

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7. Any Other Business

8. Future Meeting Dates

To note future meeting dates as follows:

13 February 2023

5 June 2023

25 September 2023

6 November 2023

12 February 2024

All meetings to start at 2pm

Monica Fogarty
Chief Executive
Warwickshire County Council
Shire Hall, Warwick

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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) to request a joining link.

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

Monday 10 October 2022

Minutes

Attendance

Committee Members

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

Officers

Andy Carswell, Democratic Services Officer
Jan Cumming, Senior Solicitor and Team Leader
Lisa Eglesfield, Team Lead (Benefits)
Liz Firmstone, Service Manager (Transformation)
Victoria Jenks, Pensions Admin Delivery Lead

Others Present

Helen Scargill (West Yorkshire Pension Fund)

1. General

(1) Apologies

Apologies were received from Councillor Brian Hammersley, Paul Morley and Matthew Mott.

(2) Board Members' Disclosures of Interest

There were none.

(3) Public minutes of previous meetings

The minutes of the meetings held on 14 February 2022 and 6 June 2022 were approved as an accurate record.

2. Forward plan

The item was introduced by Vicky Jenks (Pensions Administration Delivery Lead), who reminded members that the meeting had been rescheduled from 30 September. As a result the item on abatement would be considered at the November meeting and the item on the discretions policy would be discussed in February. Members were told the November meeting date had been incorrectly listed as being on the 15 when it had been scheduled for 7 November. Vicky Jenks said the proposed training relating to Matthews had been postponed as the processes behind it had not been agreed yet.

Members noted the contents of the forward plan.

3. Pensions Administration activity and performance update

The item was introduced by Vicky Jenks, who reminded members that administration for the Fund had moved to the West Yorkshire Fund from 1 April. There had been some minor issues but the transition had generally gone well, and the teams were aware of their expectations and responsibilities and staff at the West Yorkshire Fund had been quick to raise queries when needed. The major ongoing project was to identify the correct information in instances where there were inconsistencies between the details held by payroll and administration. This would look at whether any records were being paid incorrectly, and what the correct figure should be. This would be retrospectively as well as going forward.

Helen Scargill (West Yorkshire Pension Fund) said all of Warwickshire's annual benefit statements had been processed and all but one had been released by 31 August, and the year end return had been completed. The one that had missed the deadline had been due to a payroll issue with a previous Fire and Rescue Authority that the scheme member worked for before transferring to Warwickshire. Helen Scargill said there had been some issues in terms of required data content and quality but the situation was now improving and the returns were being completed on a monthly basis. An update would be provided at the next meeting.

Regarding pension saving statements, Helen Scargill said there had been 18 instances of scheme members breaching the allowance threshold in the previous tax year. Of these, 15 had been notified before the 6 October deadline and the remainder needed confirmation of pay before the final calculation could be carried out. However this would not result in a breach for missing the deadline as the legislation stated it could be completed within three months of receiving all the required financial information.

Members were told that the West Yorkshire Fund had recently recruited a new pension administration representative, although there had been a desire to recruit two. This allowed an existing representative to take a new role focusing on Fire Pension administration. Training could be offered to anyone in Fire and Rescue Services who handled pensions materials. Helen Scargill informed members that a full disaster recovery exercise took place on 14 September and this had been successful. A report was being compiled by the Fund's Head of IT and would be made available to Warwickshire when complete.

When the annual benefit statements were issued, members were also informed there was information regarding pensions available online. This included the My Pensions portal, with a guide being sent to members on how to register and navigate the website.

Helen Scargill said there were two types of data held by the Pension Administrator. Common data referred to things such as date of birth or National Insurance number, whereas specific data related to details that were solely relevant to the fire scheme and pensions history. There was quite a lot of missing information from the 2006 data, although this was mainly from the scheme members' home addresses not being known. All of the common data for the modified 2015 data was complete and 25 per cent of the scheme specific information was missing for 2015 modified members, although Helen Scargill clarified this only related to three individuals. Barnaby Briggs and Tony Morgan said they were both happy to assist with helping to supply missing information if possible. Helen Scargill said that West Yorkshire are just data processors for Warwickshire, therefore the information belongs to Warwickshire. Information regarding members where addresses were not up to date could be shared with Warwickshire to see if members could be traced. Responding to a question from the Chair, Helen Scargill said the overall scores were towards the lower end compared with other clients. However she said many of the issues related to conflicting start dates for members of the modified scheme and this did not represent a cause for alarm as this would not affect the calculation of benefits. It was acknowledged some authorities would pass their data as being acceptable as the missing data did not make a material difference to its accuracy, whereas West Yorkshire Pension Fund would not pass it even if there was a small difference in the data.

The Chair noted that, according to the data, the number of members had dropped from 1,400 to 1,100. Helen Scargill explained this was from duplicates from more than one data set being merged together, and 1,100 was now the correct membership number.

Members noted the contents of the report.

4. Regulatory and Policy Update

The item was introduced by Vicky Jenks, who said that although the abatement policy would be discussed at the next meeting, it would also come back in February after being discussed at December's Staff and Pensions Committee. It needed to be updated in line with the Ombudsman ruling so that it was not a blanket policy, as cases should be looked at on an individual basis. The policy was being worked on by the HR advisory team. Regarding issues surrounding McCloud and immediate detriment, Vicky Jenks said Warwickshire was now paying Category 1 cases for anyone retiring between now and October 2023, after the previous decision to pause payments. Barnaby Briggs (Assistant Chief Fire Officer) said he was aware discussions about a possible class action relating to immediate detriment were taking place. He added that as his pension was an immediate detriment case he needed to declare an interest and would not take part in the vote on the recommendation.

The Chair asked for clarification that additional costs to the Council had been considered when making the decision to unpaue payment of Category 1 cases. Vicky Jenks confirmed the LGA spreadsheet calculator had been used to assess costs per individual case and this had formed part of the report to the Scheme Manager in order to make a decision.

It was resolved that members noted the contents of the report and endorsed the decision regarding the payment of Category 1 cases in relation to immediate detriment.

5. Risk Monitoring

Vicky Jenks told members that the data quality scores for pensioner, payroll and administration records was now being included as an item on the risk register. The Chair said he would like to receive some training to improve his understanding of how the risk scoring matrix rationale worked, as it was different from the ones he was familiar with.

Members noted the contents of the risk register.

6. Any Other Business

Barnaby Briggs asked if there was an update on the recruitment pathway process. Lisa Eglesfield (Team Lead, Benefits) said the last steps of the process were being worked on and it was due to be completed and signed off the following day. She said there were two sets of pathways; one related to those affected by immediate detriment and those who were not, and the other set of pathways related to those who had to retire on the grounds of ill health and those who had not.

Vicky Jenks said in future it should be easier for members to access their information regarding their pension now that the supply of data between the Warwickshire and West Yorkshire Funds was improving and people were clearer on their responsibilities.

Regarding the annual benefit statement that had not been issued before the deadline, the Chair said this did not amount to a reportable breach. He said this would be noted as a technical breach instead. Vicky Jenks said the member in question had been informed of the delay and was satisfied with the explanation for it.

The Chair said he would be attending the upcoming LGA Fire Pensions Conference and he would report back on what happened.

7. Future Meeting Dates

Members noted the future meeting dates.

8. Reports Containing Confidential or Exempt Information

Resolved: To approve the motion to exclude the public.

9. Exempt Minutes of the Previous Meeting

The exempt minutes of the meeting held on 6 June were approved as an accurate record.

The meeting rose at 11.09am

.....
Chair

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

7 November 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.
- 1.2 Appendix 2 of this report sets out the identified risks and how responsibility for their management is shared between Warwickshire County Council and its Fire Pensions Administration provider, along with the mitigations in place to manage them. Appendix 1 confirms how the impact scores for those risks are calculated.
- 1.3 The Board will note that the risk register has been updated since the last meeting. Changes have been indicated by use of red text in the document at Appendix 2. The change this month relates to a correction of the risk score for item 4 as the total score was incorrect.

2. Financial Implications

- 2.1 None

3. Environmental Implications

- 3.1 None

4. Timescales associated with the decision and next steps

- 4.1 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

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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	
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 Investment 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.

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FIRE PENSIONS ADMINISTRATION - RISK SHARING PROPOSAL

Oct-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	Pandemic (Administration and People Related)	Shared	Averse	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	16	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					

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

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
				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	3	3	12	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					

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
				Data provided by previous administrator in consistent, with data on both 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 geopolitical 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					

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
				Local government elections impact on committee continuity	Incorrect benefit payments to scheme members				Use of digital technology - remote working and remote meetings	Both				Audit of governance arrangements	WCC
				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										Look at best practice to create training plan	Both
				Unpopular government decisions impacting on Fire Pension Schemes											

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

7 November 2022

Pensions Administration Activity and Performance update

Recommendation(s)

The Board considers and comments on the information included in this report.

1. Executive Summary

- 1.1 The administration of the Firefighter Pension Schemes and pensioner payroll for Warwickshire Fire and Rescue Service are undertaken by West Yorkshire Pension Fund (WYPF).
- 1.2 Monthly reports are provided by WYPF and August and September reports are available on the attached appendices.
- 1.3 Following the transfer of the administration and pensioner payroll service, WYPF is undertaking a reconciliation exercise to ensure administration and payroll records match. The scheme manager has been made aware of this exercise and the potential for over/underpayments to be identified. Any underpayments will be corrected, and arrears paid. In the event of an overpayment, these will be reviewed on a case-by-case basis, and any decisions to recover sums will be taken in accordance with the County Council's policies and scheme of delegation.
- 1.4 WYPF have provided almost 100% of Annual Benefit Statements by 31st August 2022. Only one statement was not processed by this deadline, due to a query over pay information from a previous employer. The member was informed that the statement would be delayed. This was discussed in the Local Pension Board meeting that was held in October and a decision was made that this would not need to be reported to the Pensions Regulator as a material breach.
- 1.5 Pension Saving Statements have been sent out to all members who have exceeded the Annual Allowance threshold for 2021/22.

2. Financial Implications

- 2.1 Further information with regard to costs associated with the reconciliation exercise will be provided to the board once the process is completed.

3. Environmental Implications

None

4. Supporting Information

None

5. Timescales associated with the decision and next steps

- 5.1 It is anticipated that the project being carried out by West Yorkshire on the reconciliation of pensioner payments will be completed by 31st March 2023.

Appendices

Appendix 1 – October monthly report

Appendix 2 – September monthly report

Appendix 3 – August monthly report

Background Papers

None

	Name	Contact Information
Report Author	Lisa Eglesfield, Victoria Jenks	lisaeglesfield@warwickshire.gov.uk , vickyjenks@warwickshire.gov.uk
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Portfolio Holder	Councillor Peter Butlin Portfolio Holder for Finance and Property	peterbultin@warwickshire.gov.uk

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

Local Member(s): n/a

Other members: n/a

Monthly Report

September 2022

Warwickshire Fire Authority



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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 60](#)

FPS

Age discrimination eligibility – Factsheet

The coffee morning held on 28 July 2022 had a focus on eligibility for the age discrimination remedy.

As a reminder, to be eligible for remedy, a member must have 'remediable service'. The Public Service Pensions and Judicial Offices Act 2022 sets out four conditions in Section 1 which must all be met for service to be considered 'remediable'.

To help FRAs and administrators determine which individuals are in scope for remedy we have put together a guide to eligibility factsheet which sets out the conditions in more detail.

Additionally, the factsheet encourages scheme managers to review the cohort of membership which they have deemed to be in scope. If, after considering the content of the fact sheet, more individuals are deemed in scope, then action will be needed to address this. Full details of what action is needed has been set out in the factsheet. Sample member communications will be provided later.

ACTION: FRAs to review the eligibility factsheet and ensure that appropriate action is taken where necessary.

Abatement guidance updated

Readers may recall that informal abatement guidance was published in [FPS Bulletin 57 – May 2022](#). Since publication, the LGA has been approached by several FRAs asking whether we would be able to share a draft policy.

We are pleased to confirm that Cumbria FRS has given permission for their [retirement, re-engagement and abatement policy](#) to be shared with the sector as an example of best practice – thank you Cumbria FRS!

The [informal abatement guidance](#) has been updated to include a link to Cumbria's policy at paragraph 51.

FPS England SAB updates

SAB remedy engagement sessions

As we reported in [FPS Bulletin 57 – May 2022](#), the Scheme Advisory Board (SAB) has been invited by the Home Office to take part in a series of joint engagement sessions with the Police SAB to consider scheme specific versions of the Provision Definition Documents (PDDs) which define the provisions of the [Public Service](#)

[Pensions and Judicial Offices Act \(PSPJOA\) 2022](#) for each area of the 2015 Remedy.

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

To date, sessions have taken place on interest and eligibility, remediable service statements (RSS) and immediate/ deferred choice, and added pension and transfers in.

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

Other News and Updates

Draft LGA response to PDP consultation and call for input

We reported in [FPS Bulletin 59](#) – July 2022 that the Pensions Dashboards Programme (PDP) had launched a [consultation on dashboard standards and guidance](#) and [a call for input on the design standards](#).

The standards detail how pension schemes and dashboard providers operationally, technically or in practice must meet their dashboard duties. The guidance provides further requirements to which pension schemes must have regard when complying with their dashboard duties

To support FRAs and administrators in responding to the consultation, PDP delivered a [coffee morning session on the standards](#) on 24 August 2022.

In addition, PDP ran a series of webinars in July to assist interested parties who were preparing a response. You can find links to [recordings of the webinars](#) on the PDP website.

The deadline for responses is 30 August 2022. We are pleased to share our [draft response to the standards consultation and call for input](#). The draft is still to be approved internally before it is submitted, but we do not expect any significant changes to be made.

Pension awareness campaigns

As part of Pensions Awareness Week, TPO is hosting a webinar on How to Avoid the Ombudsman. The webinar is taking place on 14 September at 11am.

The webinar will be a panel chaired by TPO's Head of Engagement and will have panellists from various areas of the organisation – Early Resolution, Adjudication, Casework Support and Enquiries. The panellists will discuss tips and advice on how to resolve complaints without resorting to the Ombudsman. The session will run for 45 minutes, which includes 15 minutes for audience questions.

The [pension awareness 2022 promotional toolkit](#) includes posters, leaflets and other resources that you and your employers can use to promote the campaign to Scheme members.

Pension Awareness Day takes place on 15 September 2022. You can find a timetable of live events for members that will take place between 12 and 16 September 2022 on the [Pension Awareness Day website](#).

The Association of British Insurers (ABI) and the Pensions Lifetime Savings Association (PLSA) are leading a campaign to boost the nations 'Pension Attention'. The campaign will run from September to November.

You can find files and guidance for the Pay Your Pension Some Attention brand and logo on the [ABI website](#).

AGM – 25 and 26 October

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

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

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

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

[Day 1 – Tuesday 25 October 2022 4:30pm - 6:30pm](#) followed by drinks reception. Primarily for Scheme Managers and Local Pension Board Chairs, day 1 of the conference is the AGM which will provide an update from the Pensions Regulator and will offer the opportunity to network with counterparts in other Fire Authorities.

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

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

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

We look forward to welcoming you to the event!

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

Administrator remedy self-assessment survey

In last month's client report, we confirmed that WYPF participated in the survey and were pleased to relay that we were already following best practice for the most part when measured against the recommendations (section 5) of the LGA report. The following updates you on where WYPF stand within the recommendations made:

5.1 Project teams: It was pleasing to see so many administrators confirm that they had a dedicated project team overseeing Sergeant/McCloud, and we strongly advise that, where possible, all administrators adopt this approach. We would expect project teams to meet frequently and endorse fortnightly/monthly meetings.

WYPF meet at least quarterly, with delegates including senior management as well as various departments such as IT, communications and administration. Our project plan tracks the wide spectrum that you would expect, from software development, consultations due through to the expected arrival of regulations. Discussions concerning data extracts and communications to member's feature.

5.2 Project Implementation Documents (PIDs): Where project teams are established, we would expect that a PID is created. The PID should clearly document the aim of the project, stakeholders involved. It should closely track timescales as well as highlighting risks and tracking progress.

WYPF follow these measures, with risk assessment monitored.

5.3 Data collection template: It was concerning to see that some administrators are yet to supply the data collection templates and, although we understand the rationale behind this decision, we feel that this could be causing FRAs an unnecessary burden in terms of timescales and resourcing. We strongly recommend that a date is agreed as to when the templates will be shared.

The data extracts are currently being tested and we're hoping these will be signed-off and issued to FRAs shortly.

5.4 Recruitment and retention: Due to the current employment market, we strongly recommend that administrators monitor closely their recruitment needs and ensure that adequate plans are in place to address any shortfall in capacity.

WYPF have implemented and are continuing a recruitment exercise. We have already recruited to vacant posts and are currently training new staff but we have also created additional posts in anticipation of the increased workloads due to Sargeant and Dashboard etc.

5.5 Training and development: We understand that as legislation evolves administration teams will need to be brought up to speed on all regulation developments, the Firefighter's pension team at the LGA can support administrators with this and will gladly provide training on a range of subject matters.

WYPF attend national and regional group meetings and our delegate acts as the Chair (and Technical Adviser in the case of SAB) in many of these. Training is also provided to Team Fire to ensure individual knowledge is up to date.

5.6 Roles and responsibilities: The mixed responses received to Q29 and Q30 confirm that clear roles and responsibilities between each stakeholder need to be defined. This is something that the LGA will work on and aim to reach an agreed consensus with all interested parties.

In relation to communicating Sargeant, WYPF believe the main contact for individual member enquiries would depend on the nature of the query, but a clear division of duties will need to be agreed with FRAs.

5.7 Consultation responses: We expect all administrators to respond to consultations which have a direct impact on them. It may be that you feel this is unnecessary in cases whereby the SAB or LGA are responding along the same lines as yourself, however, each comment and challenge provides additional weight.

WYPF do and will continue to respond to consultations where appropriate (i.e. those that relate to changes to the scheme and/or members' benefits).

5.8 FRA concerns: We understand that some administrators have concerns about a small proportion of the FRAs which they administer. It is strongly encouraged that these concerns are highlighted at the earliest opportunity with the relevant Scheme Manager. Should administrators need any support with this the LGA are on hand to assist.

WYPF work closely with all FRAs and provide training sessions on key areas.

5.9 Business as usual (BAU): It is pleasing to see that administrators are keen to ensure that BAU remains unaffected during Sargeant and Matthews. We recommend that BAU is regularly discussed with FRAs, and the impact of all projects is closely monitored to ensure that there are no detrimental effects towards BAU.

WYPF and FRAs regularly discuss work issues at quarterly meetings and further updates are provided via the Hot Topics blog. WYPF is monitoring BAU and projects whilst maintaining an open dialogue with FRAs.

5.10 Software suppliers: As we understand it, all software suppliers have provided administrators with their project implementation plans. We recommend that all administrators familiarise themselves with such plans and enter open discussion with software suppliers should any issues be identified. We also recommend that the plans are closely monitored by the project team to ensure that timelines and costings are adhered to. Where concerns have been raised about software, we strongly recommend that an open dialogue is entered, and issues are openly aired. The LGA is willing to provide support to administrators so that an early amicable resolution can be achieved.

WYPF meets with its software provider regularly to discuss and monitor the progress of their implementation plan to meet the requirements of regulation and legislation changes.

Annual benefit statements (ABS) and Pension Savings Statements:

WYPF issued all possible ABS by the statutory deadline of 31 August. A small number of FRAs will have had less than 100% issued due to some data quality issues but all have had in excess of 99% issued by the deadline.

Projections were provided for all members and examples of the statements along with the member newsletter was launched to coincide with the statements. These were included in a recent Hot Topics blog.

The team are now focusing heavily on reporting of Annual Allowance (AA) and the production of annual Pension Savings Statements (PSS) prior to the statutory deadline of 6 October.

PSS must be provided to members where we believe there is a breach, or the value is close to breaching, of the AA tax limit. A factsheet was issued quite recently detailing what annual allowance is, who it mainly affects, and why it is important for FRAs to respond to our additional pay requests.

Please note: A PSS must be provided to an individual even if it appears there won't be an actual tax charge (as the previous three-years' of unused allowance can be used to offset a current-year breach). However, some members may benefit from other pension arrangements or from rental income from property (both may affect their AA values) that WYPF won't know about. These should be included in their AA calculations to provide a revised total value which then may be subject to a tax charge.

Action: please respond to emails requesting pay information immediately.

Ill-health and Injury pensions:

Please ensure that your HR department is using the most up to date medical certificates for ill health and injury. These can be found on the Member Area of the FPS regs website along with information on how they should be completed. Incorrect certificates can result in delays

to the payment of members benefits. Remember, the ill-health process is an employer-driven process and the responsibility rests with the employer with regards to the certification and agreement / challenge of the IQMP decision.

When an injury award is made FRAs should let the member know that the injury pension will be reduced by any Department for Work and Pensions (DWP) benefits paid. Often members are not aware of this and it can lead to overpayment, particularly when DWP are late in paying any benefits the member is entitled to.

Any overpayments made have to be recovered under the legislation. WYPF have recently amended their documents to try and make this clearer, however, members retiring on ill health grounds have a lot to think about, of which the payment of the injury award is usually the last. It would be useful if this could be mentioned to them early on in the retirement / welfare process.

There is information on the FPS regs website on this topic and the Compensation Scheme is one of the topics being covered at the AGM, if you feel you need to refresh your knowledge in this area.

Additional Reports – When requesting additional reports can FRAs please provide all necessary and relevant data with their initial request. This will enable WYPF to provide the required data in one report without the need for the FRA to submit subsequent requests clarifying what is required and without the need for WYPF to provide a second or even a third report.

Data breaches: None this month

4. Communication & Training

Communications

Pre-retirement seminars attended by WYPF during June: None

Dorset & Wiltshire – 25 August

East Sussex - 17th August

Pension boards attended

Cambridgeshire – 24 August

Dorset & Wilshire - 25 August

Leicester - 1 September

Devon & Somerset – 7 September

Royal Berkshire – 7 September

Pension boards upcoming

Nottingham – 23 September

North Yorkshire – 29 September

National meetings

Attended

HMT, Home Office and/or LGA – 7 during August
North-East regional group - 17 August 2022
SAB - 8 September 2022

Upcoming

North-West regional group -14 September 2022
FPS Communications Working Group -16 September 2022
FPS Technical Group - 25 October 2022
FPS AGM - 25 October & 26 October 2022
SAB - 8 December 2022

FRA training delivered by WYPF:

Training on the website, portal forms & other general pensions administration issues to Shropshire Fire – 4 August

5. IT Update

KPI Reporting

We are still on track to release new KPIs this autumn.

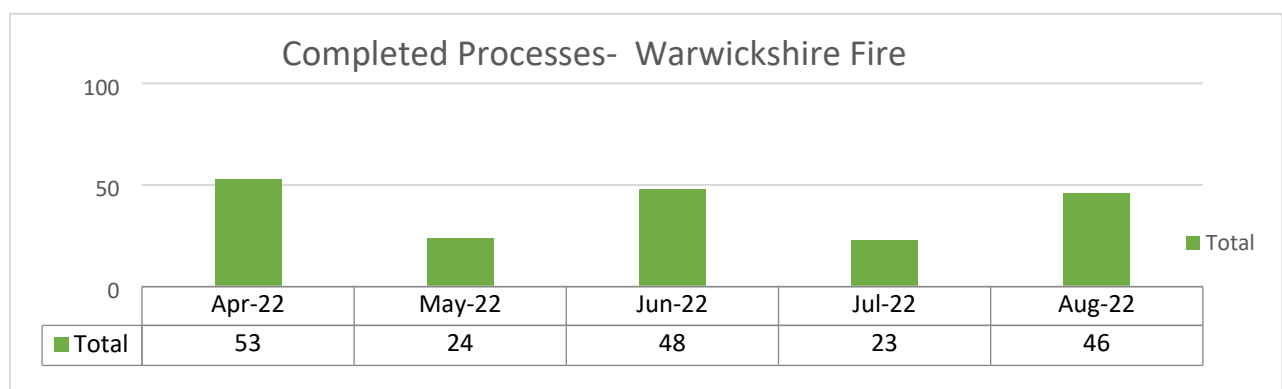
Through our analysis we have found some issues with a small number of measures and we are liaising with IT to rectify the coding.

We are also working with our officers and discussing possible ways we could improve processes and find some common ways of working that will improve consistency and measures.

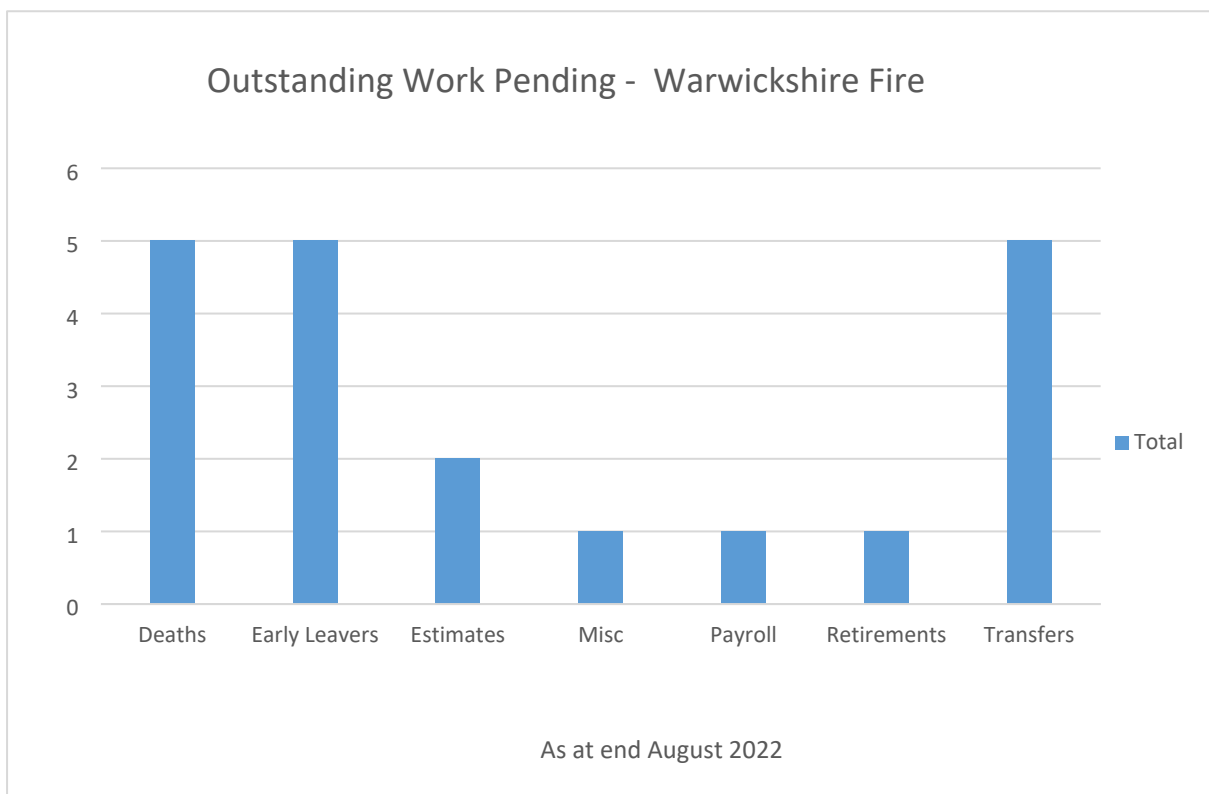
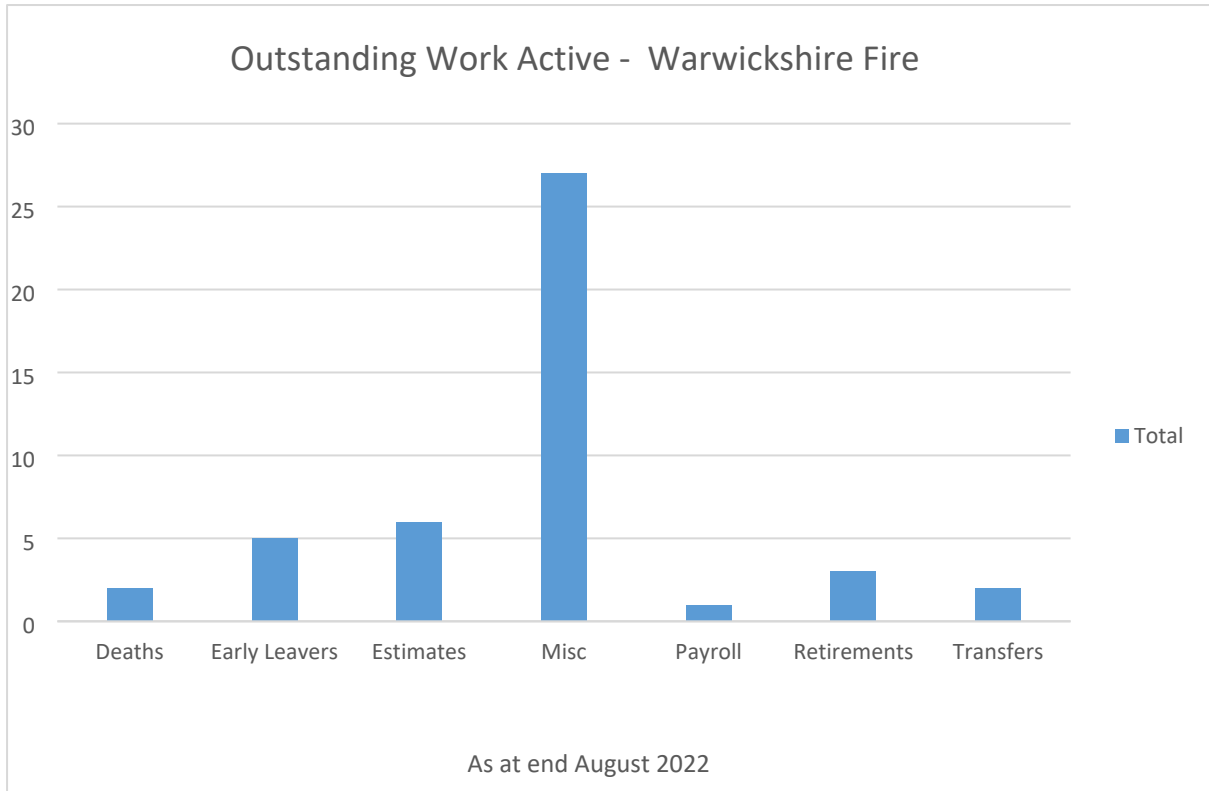
6.Key Performance Indicators

Completed processes

Warwickshire Fire (1 to 31 August 2022)						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Age 55 Increase to Pension	1	20	1	85	100	7
Change of Address	3	20	3	85	100	9
Death in Retirement	4	5	3	85	75	10
Deferred Benefits Into Payment/Payment of Lump Sum	3	3	3	85	100	1
Deferred Benefits Set Up on Leaving	1	10	1	85	100	1
General Payroll Changes	7	20	7	85	100	1
Initial letter Death in Retirement	4	10	4	85	100	1.25
Payment of Spouses _Child Benefits	3	10	3	100	100	1
Pension Estimate	6	10	6	85	100	2.83
Pension Set Up/Payment of Lump Sum	4	3	4	85	100	1
Retirement Actual	4	10	4	85	100	1
Set Up New Spouse Pension	3	5	3	85	100	1
Transfer In Quote	1	10	0	85	0	46
Update Member Details	2	20	2	100	100	1
Monthly Pension	444	Pay date	444	100	100	



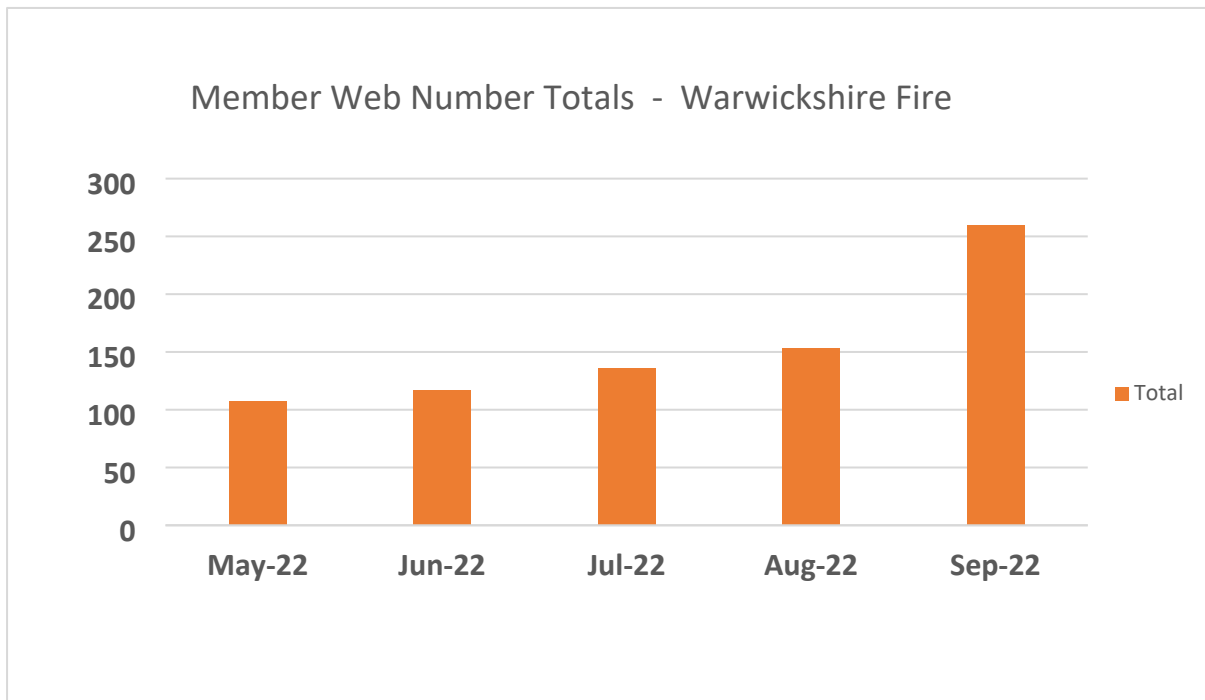
7. Work in Progress



8.Member Web Registrations

The number of members signed up to member web are:

Status	Number
Active	108
Pensioner	97
Pensioner Ex-Spouse	0
Beneficiary Pensioner	6
Deferred Ex-Spouse	0
Deferred	49

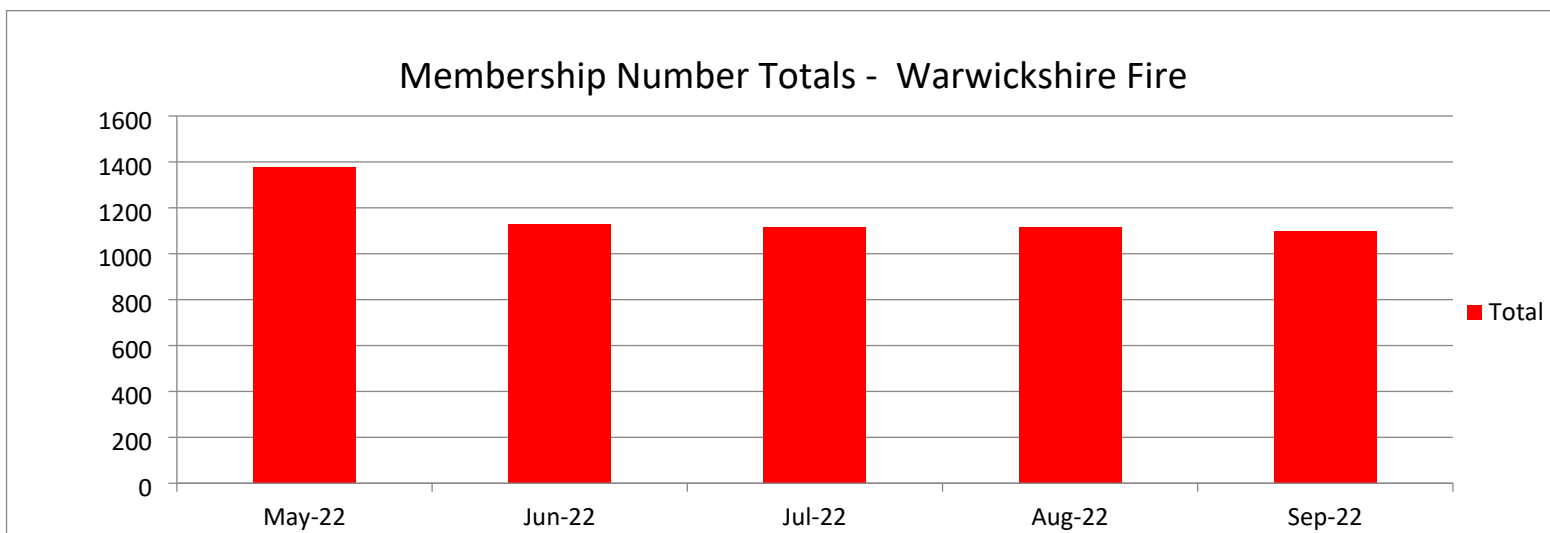


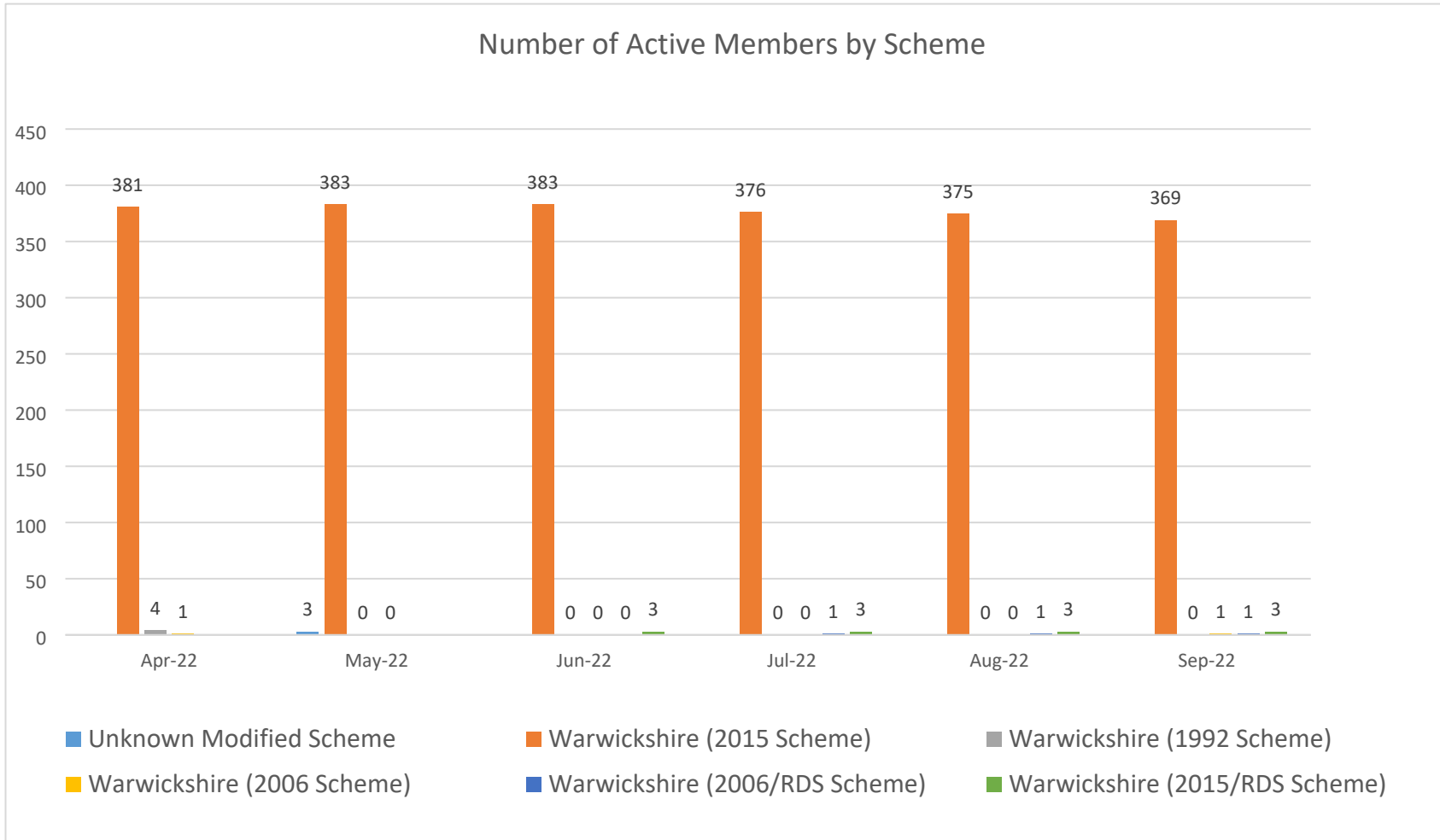
9. Calendar of Events

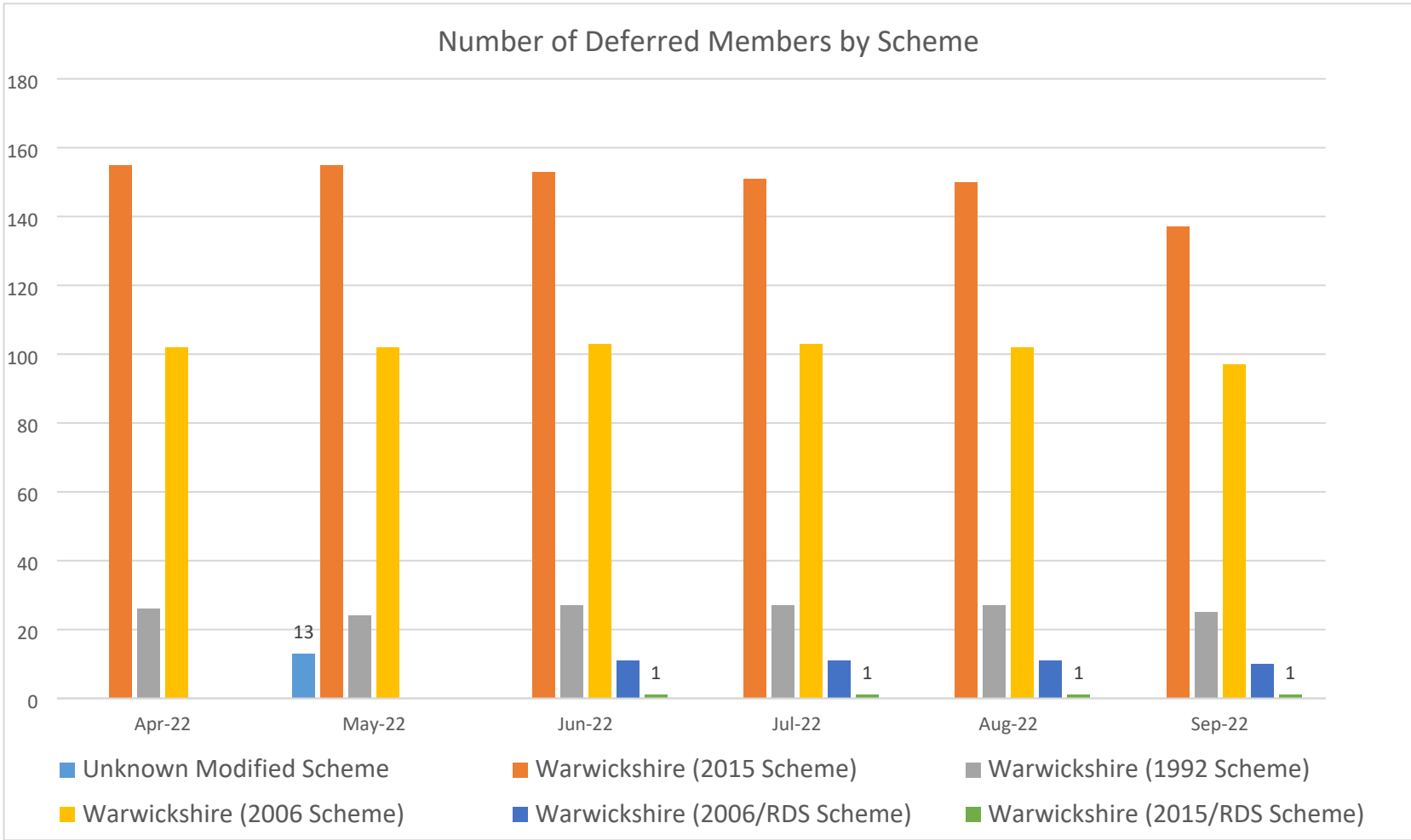
January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's 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	25	360	58	0	0
Warwickshire (2006 Scheme)	1	97	2	1	2	0
Warwickshire (2006/RDS Scheme)	1	10	15	0	0	0
Warwickshire (2015 Scheme)	369	137	6	0	3	8
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	✓	✓	✓	✓	✓	
Audits Per Year					1	1	1	1	1	5
Benefits										
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		✓			✓	
Audits Per Year					4	5	4	4	4	21

12. Overriding Disclosure Time Limits

Disclosure Requirement	Time Limit	Number of breaches in month
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

Monthly Report

August 2022

Warwickshire Fire Authority



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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 59](#)

FPS

Administrator self-assessment survey results

We are pleased to be able to share with you the results of the survey undertaken by the Scheme Advisory Board secretariat in order to provide us with insights into the current administration arrangements and the challenges being faced by administrators, in light of both business as usual and remedy.

The administrator self-assessment survey was launched in [FPS Bulletin 54 – February 2022](#) and ran between 24 February and 18 March. It comprised of 57 questions which focused on variety of topics including Sargeant, Matthews, and pensions dashboards.

The aim of the survey was to understand more about arrangements for administering the Firefighters' Pension Scheme and specifically for implementing the age discrimination remedy.

The survey received a 100 per cent response rate which will allow an accurate assessment of the sector and a better understanding of the challenges that administrators face.

The [full results of the survey and recommendations](#) can be found on the protected area of the [FPS Regulations and Guidance website](#).

ACTION: Administrators to consider the recommendations set out in section 5 of the report.

WYPF participated in the survey and are following best practice in the majority of areas detailed in section 5 (which are recommendations).

We are actively engaged in ongoing discussions and anticipate changes to address best practice in the few aspects that are still outstanding.

FPS 2006 special members – Corrective action

We have been alerted to an issue on which FRAs will need to take immediate remedial action.

The issue relates to members who have elected for special membership under the first options exercise and to repay their contributions by way of periodic contributions, however, leave part way through their contract and therefore have a number of instalments still outstanding.

The regulations support the fact that the member's decision to leave should not impact their ability to continue to pay for the cost of past service. If the member leaves, or opts out, they have the option to pay all remaining contributions within three months of the leaving date in order to count all of the service ([Rule 6A, Part 11](#),

[paragraph 9](#)). Alternatively, the member can continue to pay periodical contributions as a deferred member ([Rule 6A, Part 11, paragraphs 3 and 7](#)). These regulations were covered in detail at a [special members workshop the LGA hosted in 2018 \(slides 99 and 100\)](#).

We would expect the options above to be offered to a member as a matter of course, however, as we understand it, some FRAs have not offered their members these options.

In preparation for the second options exercise, our view is that corrective action should be taken to address this issue. FRAs should use the time between now and the 2023 options exercise to rectify any such issues where there are regulations in place to do so. This will help keep the 2023 options exercise as straightforward as possible. We therefore recommend that all FRAs follow the steps set out below.

1. FRAs to revisit past deferred cases to determine what options were offered: a. If the member has been offered the options as set out above, then no further action is needed. b. If the member has not been offered the options as set out above, then progress to step

2. Confirm which regulatory option applies to the member:

a. If the member has left within the last 3 months, then they can be offered:

- i. The option to repay the outstanding contributions by lump sum
- ii. The option to continue with *periodic contributions
- iii. The option of a pro-rated pension based on the contributions already paid

b. If the member has left more than 3 months ago, then they can be offered:

- i. The option to continue with *periodic contributions
- ii. The option of a pro-rated pension based on the contributions already paid

*Periodic contributions would need to be reviewed and possibly altered to take account of any gaps in the repayment schedule. We believe that the correct regulatory option available is to recalculate the instalments so that the remaining balance is repaid at the original 10-year point – in line with Rule 6A (8). The calculator has been specifically designed to ensure that the correct proportion of interest is applied for the 10-year period.

3. FRAs should take immediate steps to contact affected members and notify them of the options available to them. a. If the member elects for periodic contributions, as they are no longer employed and instalments cannot be taken from their salary, they will have the option of paying by standing order.

4. FRAs to notify administrator of the member's decision and update their record accordingly.

ACTION: FRAs to revisit all special member leavers and opt outs to ensure that correct options have been given at deferment.

Service history data for transitional FPS 2015 members

As of 1 April 2022, all members who remain active members of the Firefighters' Pension Scheme do so as members of FPS 2015. The FPS 2015 is a statutory, defined benefit, career average, public service pension scheme.

Unlike the final salary schemes (FPS 1992 and FPS 2006), where pension entitlement is based on scheme membership and pay on leaving the scheme, career average scheme benefits are worked out based on a proportion of pay for each year of membership.

As qualifying service in the FPS 2015 is added to qualifying service in the FPS 1992 or 2006 to determine whether a member with continuity of service qualifies for retirement benefits, any reduction in pensionable service due to an unpaid service break such as maternity/paternity/adoption leave, industrial action, and career breaks will affect that date by the relevant number of days (for example a member needs a minimum of 25 years across the FPS 1992/ 2015 combined to retire before age 55). Therefore, FRAs should continue to record and report any days lost to unpaid service to their pension scheme administrator.

ACTION: FRAs to have a process in place to ensure that their administrator is informed of any unpaid breaks in service for transitional FPS 2015 members.

Age discrimination remedy - Data sharing

As part of the data collection exercise for age discrimination remedy FRAs may identify a proportion of cases whereby information such as pensionable pay and contributions are required from another FRA. This is because the member has been subject to an inter-brigade transfer during the remedy period.

We understand, from speaking to stakeholders, that concerns have been raised over sharing this data, particularly when it comes to General Data Protection Regulation (GDPR).

The Public Service Pension and Judicial Offices Act 2022 states that with effect from 1 October 2023 all in scope members must be rolled back into their relevant legacy scheme and reformed service, for the remedy period, should be kept as an underpin.

This corrective action cannot be taken unless the current administrator has access to the data they need to perform this function.

This issue was discussed in detail at the Fire Technical Working Group (FTWG) on Monday 25 July. It was decided that, to remove any GDPR issues, the information should be shared with the current administrator instead of the current FRA. This is because the administrator has a legitimate reason for needing the data.

To assist FRAs in determining which administrator to contact a comprehensive [list of FRAs and their administrators](#) can be found on the [FPS Member website](#) .

ACTION: FRAs to share pensionable data for members who are subject to age discrimination remedy and have had an inter-brigade transfer during the remedy period with the current FRA's administrator on request.

FPS England SAB updates

2020 Valuation assumptions

At the last SAB meeting GAD provided the Board with a presentation on four of the key demographic assumptions which are proposed to be used in the 2020 valuation. These are: withdrawal from the scheme, promotional pay, age retirement and commutation.

GAD confirmed that there had been an improvement in the data provided by FRAs for the 2020 valuation.

The Board agreed that a discussion on the key assumptions should be taken forward to the Cost-Effectiveness committee to ascertain if these assumptions are reasonable. The Cost-Effectiveness committee met accordingly on 5 July 2022 and these GAD will now consider the assumptions to be presented to the Home Office for incorporation into the valuation exercise.

Membership, committees, and training

SAB members have been asked to complete a training needs analysis form for the secretariat so that any training needs can be identified with a view to performing training sessions before the end of the year which will include SAB induction training and Local Pension Board Wrap-up training sessions.

Other News and Updates

Public Sector unions granted judicial review over McCloud cost remedy

As previously referred to in [FPS Bulletin 51 – November 2021](#), 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. A judicial review is a type of court proceeding in which a judge reviews the lawfulness of a decision or action made by a public body. In other words, judicial reviews are a challenge to the way in which a decision has been made, rather than the rights and wrongs of the conclusion reached.

It is not really concerned with the conclusions of that process and whether those were 'right', as long as the right procedures have been followed.

The judicial review is expected to be heard towards the latter part of 2022.

TPO McCloud factsheet published

On 20 July 2022, TPO published [a factsheet on McCloud](#).

The factsheet sets out TPO's views on what affected members and schemes can do now and TPO's present approach to dealing with McCloud complaints.

TPO's current general starting position is that it would not investigate McCloud complaints. This is because it acknowledges that the Government is taking steps to

address the discrimination with retrospective effect. TPO will, however, carefully look at the facts of each case before deciding whether to investigate.

Examples of where TPO may investigate include, allegations of maladministration, like, failure to explain what is going on and/or engage properly with the member; or investigate where a member is suffering severe financial hardship or other serious injustice and the scheme is not putting in place any interim arrangements to address the injustice within a reasonable period.

ACTION: FRAs to review the information in the factsheet to ensure they do not fall short of TPO's expectations.

DWP responds to consultation on the draft pensions dashboards regulations

On 14 July 2022, the Department for Work and Pensions (DWP) responded to the consultation on the draft Pensions Dashboards Regulations.

The DWP has also published a summary of the key policies. The summary reflects the response to the consultation.

The DWP consulted on the regulations between 31 January 2022 and 13 March 2022, which we covered in FPS Bulletin 54 – February 2022.

Readers may recall that the LGA made a robust response to the consultation, expressing concern over the proposed staging date for the FPS of 30 April 2024 given the conflicting pressures faced by employers and administrators, and the requirement to hold value data which at that point would not reflect remediable benefits. We also noted the difficulty in presenting data to scheme members based on different sets of benefits with different retirement ages.

The LGA was directly quoted within the response at paragraphs 5.14 and 5.16:

5.14. The Local Government Association (LGA) on behalf of the firefighter schemes strongly disagreed with the amount of time proposed. They felt their deadline would not give Fire and Rescue Authorities or their administrators sufficient time to implement McCloud.

5.16. ... The LGA (on behalf of the firefighter schemes) suggested an extended staging window for PSPS. They said that this would allow schemes with the capability to connect earlier to do so, with more time allowed for those with greater challenges.

We are therefore pleased to note that the staging deadline for all public service schemes has been extended by five months from 30 April 2024 to 30 September 2024 and, that the requirement to provide value data has been pushed back to 1 April 2025 at the latest and will only be earlier where a Remediable Service Statement has been issued – paragraphs 5.35-5.36.

In relation to members with different tranches of benefits, the regulations will be amended to allow scheme flexibility to provide “a separate set of values for different combinations of tranches of benefits, along with a retirement date in relation to each.” – paragraph 2.39.

The DWP will amend the draft regulations ('the Regulations') to reflect the response. We expect the DWP to lay the Regulations before Parliament in autumn.

LGA response to further consultation on pensions dashboards

On 19 July 2022, we responded to the further consultation on pensions dashboards.

DWP launched the further consultation on 28 June 2022. We covered this in [FPS Bulletin 58 – June 2022](#). The consultation included proposals on the 'Dashboard Available Point' (DAP).

You can find a copy our response on the [consultations page](#) of the [FPS Regs and Guidance website](#). Our response expressed broad support for the proposals, providing that schemes received enough advance notice of the expected DAP.

The Public Service Pensions (Employer Cost Cap and Specified Restricted Scheme) Regulations 2022

On 13 July 2022, HMT laid [The Public Service Pensions \(Employer Cost Cap and Specified Restricted Scheme\) Regulations 2022](#). The regulations come into force on 3 August 2022.

Regulation 3 amends The Public Service Pensions (Employer Cost Cap) Regulations 2014 and sets out the specified margins for the cost cap introduced by the Public Service Pensions Act 2013. The specified margins are the parameters in which scheme costs must remain before corrective action is taken. The margins are currently set at two percentage points above and below the employer cost cap rate. The new regulations amend this to three percentage points.

Last year, HMT reviewed the cost cap process and announced three changes. We covered the review in [FPS Bulletin 50 – October 2021](#). The new regulations implement one of those changes.

HMT intends that all three changes will be in place for the 2020 cost cap valuation.

Events

AGM – 25 and 26 October

We are pleased to announce that booking for the ever-popular Fire Pensions Annual Conference is now live. The two-day programme allows delegates to network with fellow colleagues and hear the latest news on the Firefighters' Pension Scheme (FPS) from the scheme's key stakeholders. You will hear important updates, including:

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

Timings are provided below, and the full programme will be available shortly. Use the links to book your place now. Please note that each day must be booked separately.

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

Primarily for Scheme Managers and Local Pension Board Chairs. day 1 of the conference is the AGM which will provide an update from the Pensions Regulator and will offer the opportunity to network with counterparts in other Fire Authorities. Following this session there will be a drinks reception on the terrace from 6.45pm.

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

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

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

There are several action points included in this month's LGA Bulletin for FRAs. These are a relatively recent addition to the bulletins and whilst WYPF haven't discussed FRA progress against those actions suggested, we think it would be beneficial to include them as a standing item at client meetings.

It would then be possible for FRAs to raise any concerns you might have and share any ideas and possible solutions. Big issues such as Remedy and Matthews would be included in these discussion and possibly assist your thoughts around planning and preparations.

Please let us know what you think in the next Client meeting.

4. Communication & Training

Communications

Annual benefit statements (ABS) were finalised with distribution commencing a week before the anticipated date of w/c 8 August and well before the statutory deadline of 31 August.

ABS website notes include both the LGA 'caveat' & Remedy flowchart / timeline with links to the full LGA notes and example templates. These were finalised in July and have been added to the site here – [Pension Statements \(wypf.org.uk\)](http://wypf.org.uk)

Active member Newsletter has also been produced and includes information about what's happened already with Remedy and what we expect to see going forward, plus other key features of FPS 2015. This can be found here - [Newsletters \(wypf.org.uk\)](http://wypf.org.uk)

In addition to the My Pension guides, the registration guide and the navigation guide included in Hot Topics on 15 July, we have produced a new employer portal guide which is also on our website - [Employer portal manual for FRAs \(wypf.org.uk\)](http://wypf.org.uk)

Pre-retirement seminars attended by WYPF during June: None

Pension boards attended

Durham & Darlington – 15th July
Northamptonshire – 21st
Tyne & Wear – 21st
Norfolk – 26th
South Yorkshire – 26th

National meetings

Attended

1 June – LGA in-person training with Team fire (worth mentioning perhaps)
23 & 24 June – Fire SAB meetings

Upcoming

North-East regional group - 17 August 2022
SAB - 8 September 2022
North-West regional group -14 September 2022
FPS Communications Working Group -16 September 2022
FPS Technical Group - 25 October 2022
FPS AGM - 25 October 2022 & 26 October 2022
SAB - 8 December 202

FRA training delivered by WYPF: None

5. IT Update

KPI Reporting

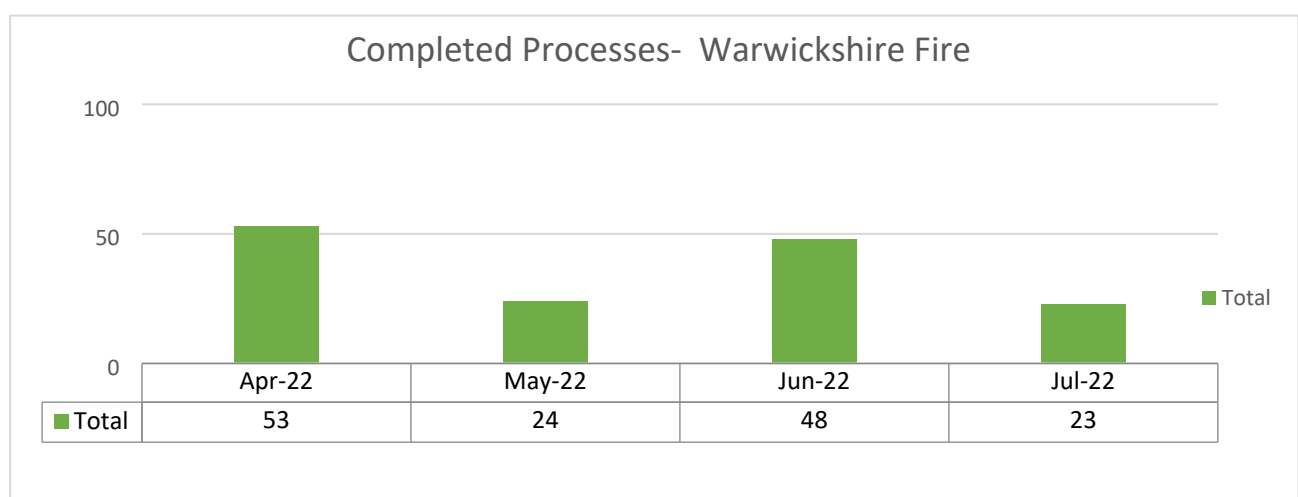
The analysis of the new suite of KPIs is going well.

As expected one or two areas need additional development and discussions are taking place with IT and the administrators. We remain on schedule to release the new KPIs in the autumn.

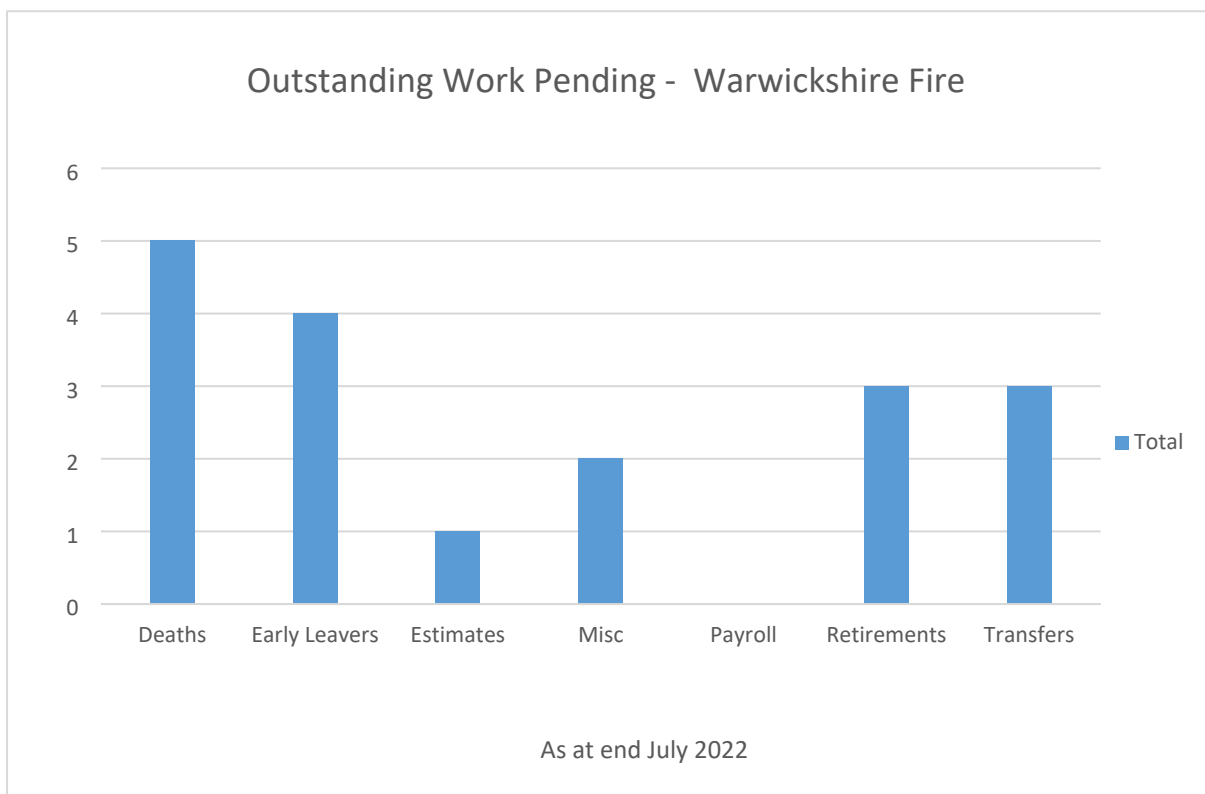
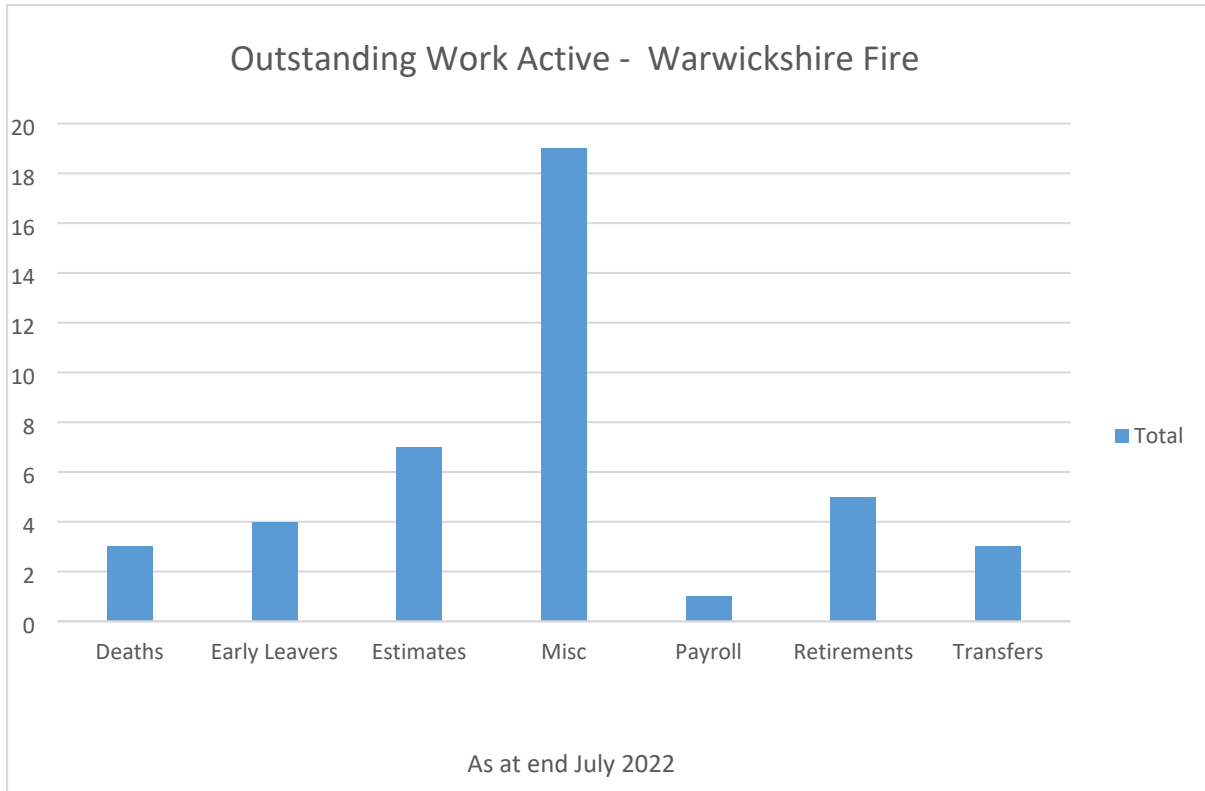
6.Key Performance Indicators

Completed processes

Warwickshire Fire (1 to 31 July 2022)						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Change of Address	1	20	1	85	100	3
Change of Bank Details	2	20	2	85	100	1.5
Death Grant Nomination Form Received	2	20	1	85	50	25.5
Death in Retirement	1	5	1	85	100	1
Deferred Benefits Set Up on Leaving	1	10	1	85	100	4
General Payroll Changes	2	20	2	85	100	1
Initial letter Death in Retirement	1	10	1	85	100	1
NI adjustment to Pension at State Pension Age	2	20	2	85	100	10
Pension Estimate	5	10	5	85	100	2.6
Pension Set Up/Payment of Lump Sum	1	3	1	85	100	1
Retirement Actual	1	10	1	85	100	1
Transfer In Actual	1	10	0	85	0	17
Update Member Details	3	20	3	100	100	1
Monthly Pension	437	Pay date	437	100	100	



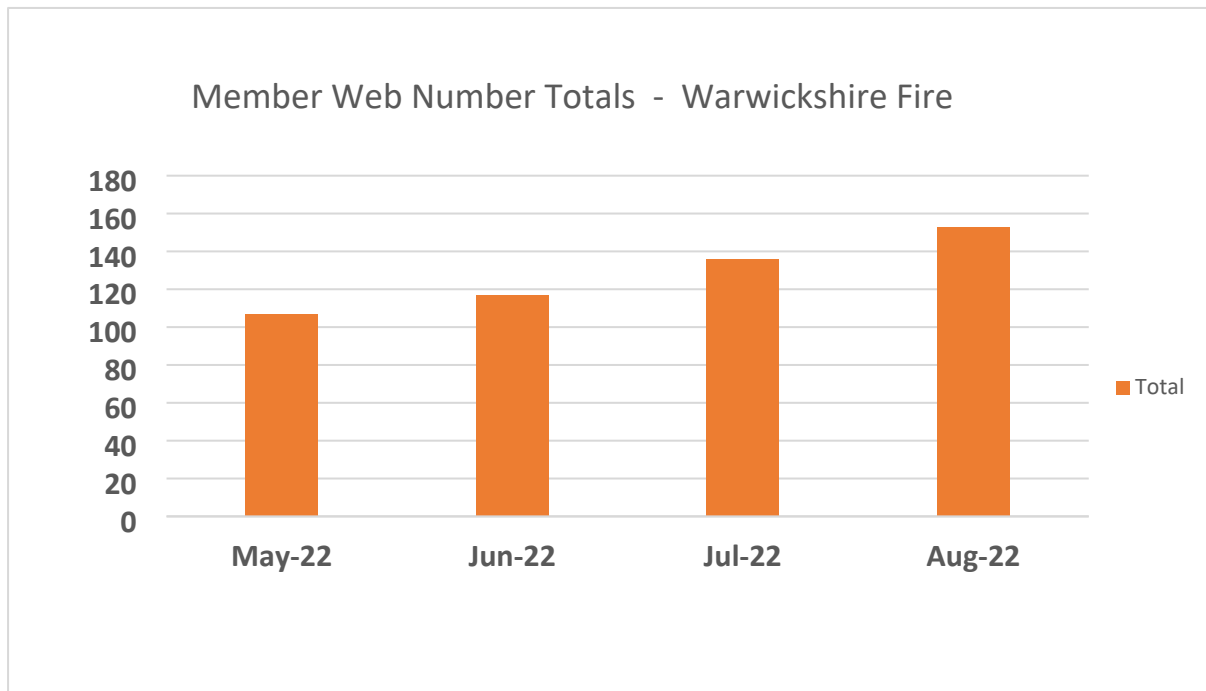
7. Work in Progress



8.Member Web Registrations

The number of members signed up to member web are:

Status	Number
Active	39
Pensioner	87
Pensioner Ex-Spouse	0
Beneficiary Pensioner	5
Deferred Ex-Spouse	0
Deferred	22

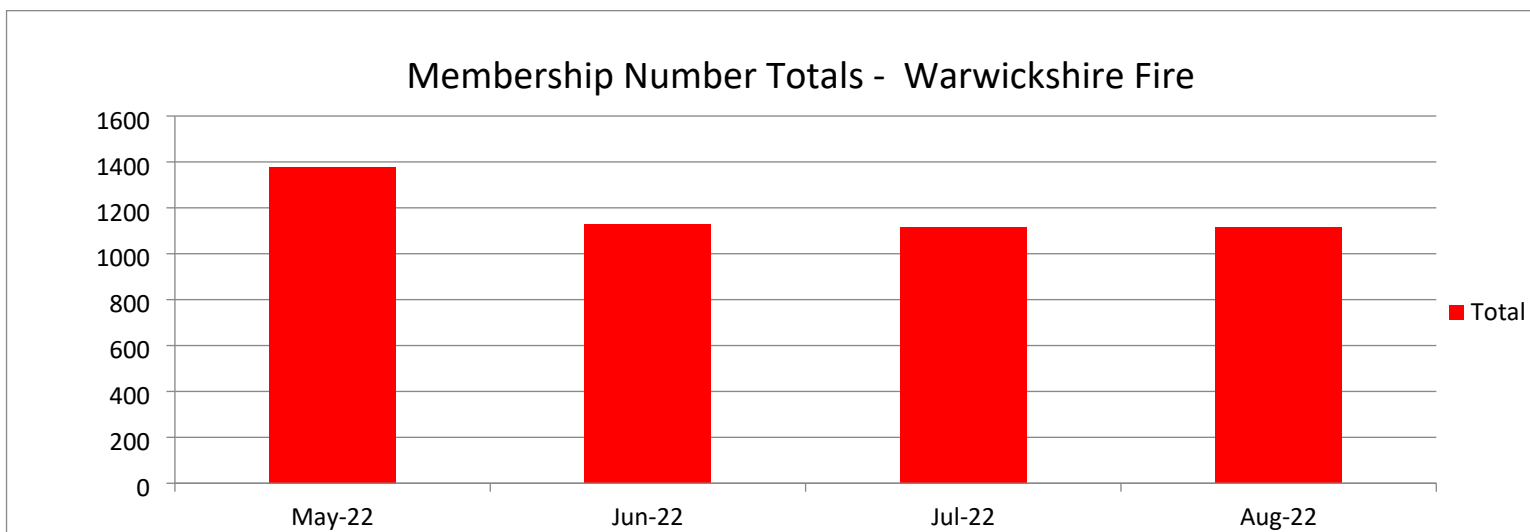


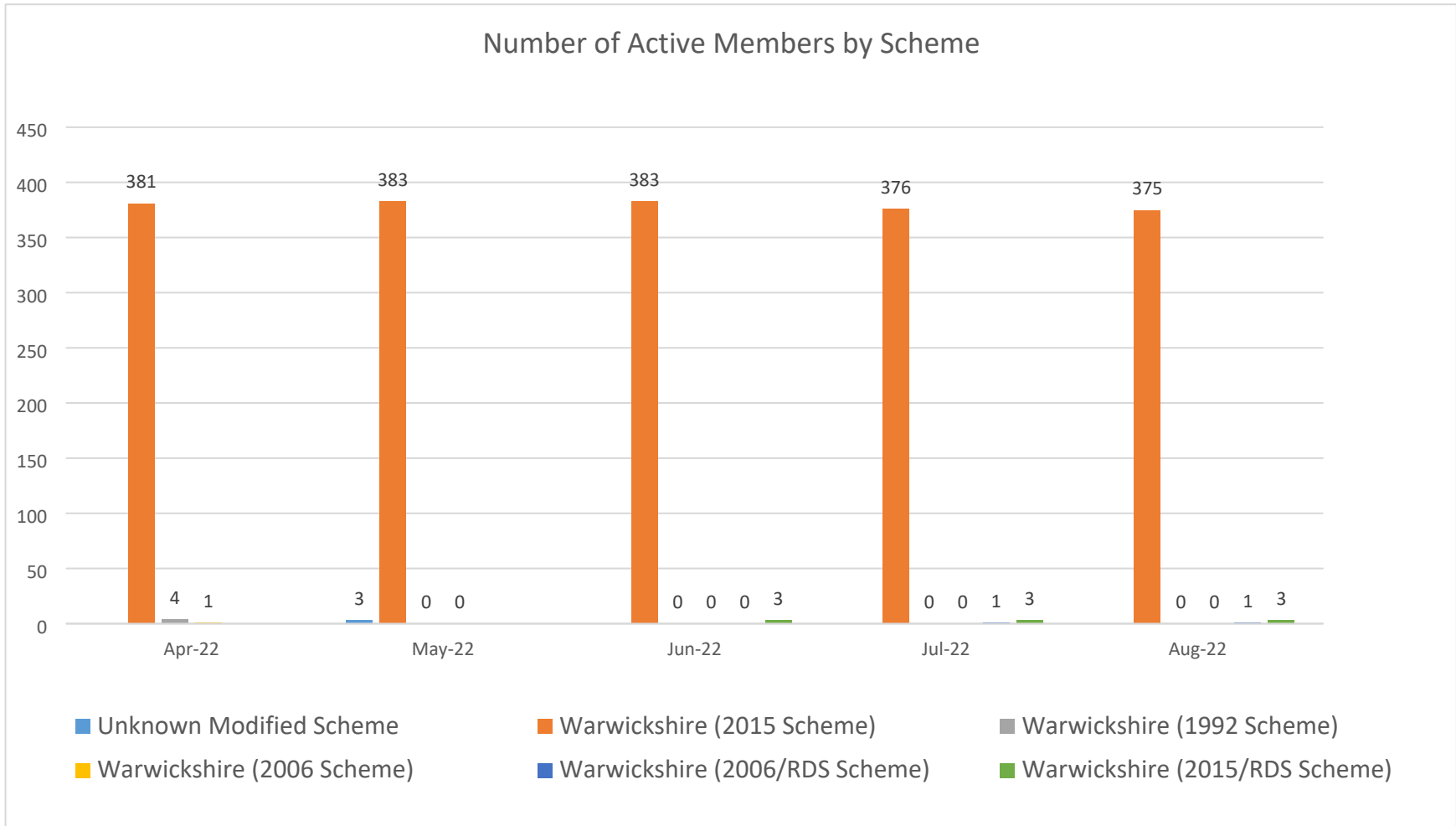
9. Calendar of Events

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

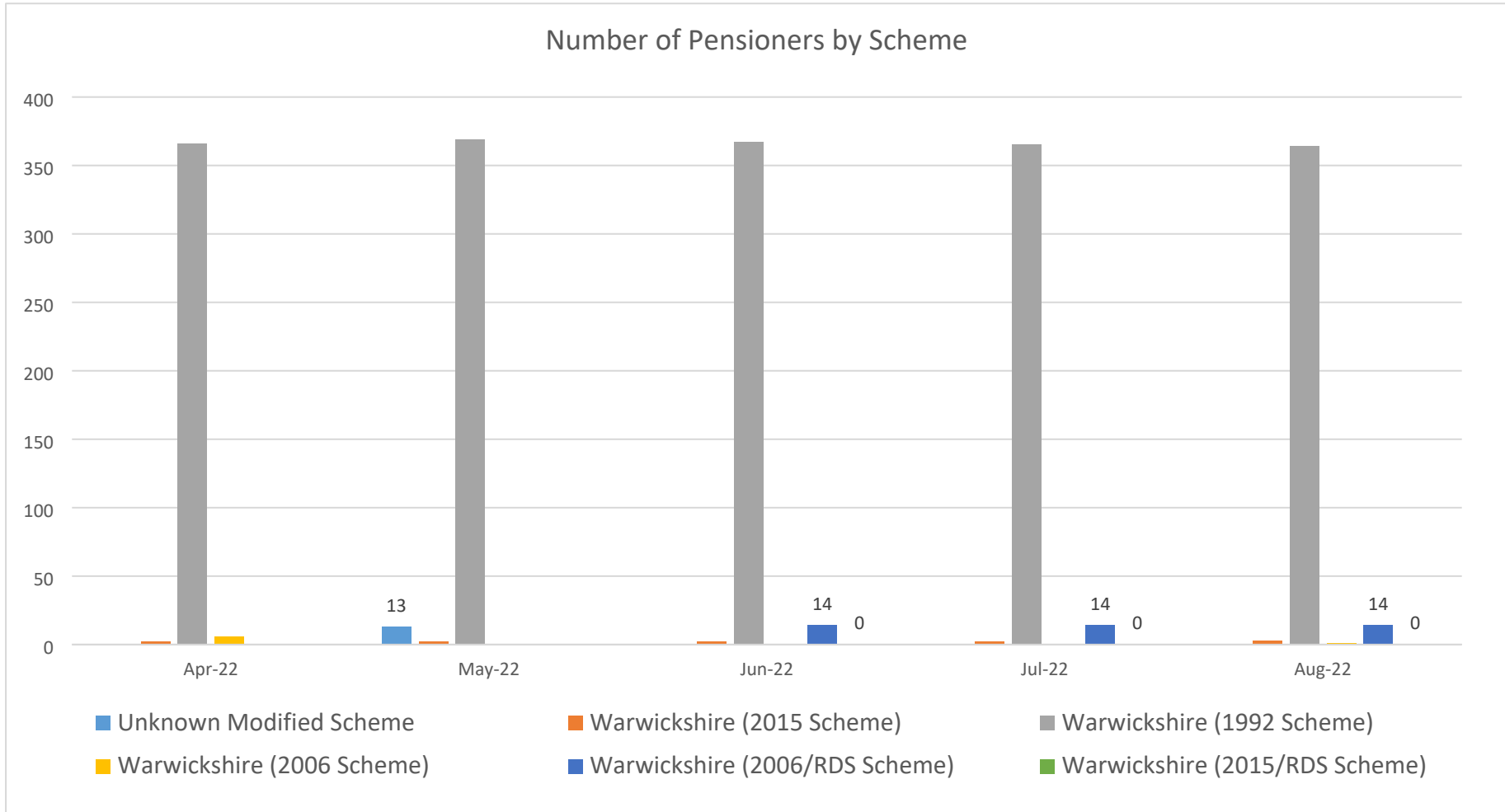
10.Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Warwickshire (1992 Scheme)	0	27	364	56	0	0
Warwickshire (2006 Scheme)	0	102	1	1	2	0
Warwickshire (2006/RDS Scheme)	1	11	14	0	0	0
Warwickshire (2015 Scheme)	375	150	3	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	✓	✓	✓	✓	✓	
Audits Per Year					1	1	1	1	1	5
Benefits										
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		✓			✓	
Audits Per Year					4	5	4	4	4	21

2.2. Overriding Disclosure Time Limits

Disclosure Requirement	Time Limit	Number of breaches in month
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

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

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Monthly Report

October 2022

Warwickshire Fire Authority



Prepared by:

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1.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 61](#)

FPS

Immediate Detriment Framework guidance updated

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

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

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

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

Potential industrial action

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

All members are building up service in the FPS 2015 from 1 April 2022. An active scheme member may elect to pay contributions at their normal contribution rate, ascertained in accordance with regulation [110 \(2\) \(member contributions\)](#), multiplied by the assumed pensionable pay that the member is treated as receiving for the period of industrial action. In addition, the scheme employer may also require that the member pays the amount of employer contributions that the scheme employer would otherwise be required to pay by regulation [117\(3\) \(employer contributions\)](#).

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

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

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

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

Member communications following eligibility factsheet

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

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

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

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

FPS England SAB updates

SAB levy 2022-23

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

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

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

SAB collaboration sessions on the Matthews remedy

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

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

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

Other News and Updates

Pensions awareness campaign postponed

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

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

Public sector exit payments

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

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

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

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

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

AGM – 25 and 26 October

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

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

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

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

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

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

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

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

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

We look forward to welcoming you to the event!

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

Clarification of abatement process for multiple pensions & re-employments

We've received guidance from our colleagues at the LGA Blue Light Team about how to assess members under the abatement rules where they have multiple pensions in payment **and** multiple new employments.

The regulations *can* be interpreted to suggest that re-employments be assessed against their like-for-like pension record (whole time and part time records compared with each other and retained/zero hour employments compared with each other).

However, the LGA have agreed and confirmed that the regulation's overarching intent is best served by adding together the total pension income compared to the members combined re-employed salaries – and where it applies, abatement being applied either;

- to both pensions proportionally, or
- full abatement applied on one pension record only

McCloud & Sargent

UPM have developed internal solutions for McCloud and we can largely operate independently of Civica for McCloud. We have developed some of this build internally.

However, we are fully reliant on Civica for Sargent. Civica have issued high level plans for both McCloud and Sargent. In the last set of meetings Civica have confirmed build will be buy persona's and development will follow persona priority.

Civica are not planning to cover all persona's in the development and manual working will be required. This will impact our administration area.

Data breaches: None this month

4.Communication & Training

Communications

Pre-retirement seminars attended by WYPF during June:

Dorset & Wiltshire – 7th

Pension boards attended

Leicestershire – 1st

Derbyshire – 6th

Devon & Somerset – 7th – attended by Matt

Royal Berkshire – 7th

Lincolnshire – 12th – attended by Matt

Buckinghamshire – 21st

Northamptonshire – 29th

Pension boards upcoming

Nottingham – 23 September

North Yorkshire – 29 September

National meetings Attended

FPF Communications Working Group – 16 September

Fire Scheme Advisory Board – 8th

LGA Matthews Working Group – 9th and 22

LGA/NPCC – Prioritisation of cases post October 2023

Home Office Working Group – Annual Allowance - 20th

SAB/HO Remedy Collaboration – 23rd

X-Whitehall Project Management Group – 29th

SAB/HO Matthews Engagement – 29th

LGA/NPCC – Remediable Service Statements & Data Gathering

Upcoming

FPS Technical Group - 25 October 2022

FPS AGM - 25 October & 26 October 2022

SAB - 8 December 2022

FRA training delivered by WYPF: None

5.IT Update

IT systems, data and cyber security are key essentials in delivery of pension administration.

Increasingly these feature in Pension Board and Committee meeting discussions. Below is a very short summary of the WYPF systems and Disaster Recovery. Further, more detailed information will be provided in the near future.

WYPF has updated its technology stack and performed its first disaster recovery test from the new technology.

WYPF has run on the following infrastructure for circa 10 years.

- Hardware IBM Blade
- Windows operating system
- Oracle 12c

At the time this technology was a leading position but has needed updating for a number of years.

Our new technology stack is as follows:

- Cisco UCS hardware
- Netapp
- Linux Red Hat
- Oracle 19c

With the installation of the new technology we have planned and executed our first disaster recovery test. This took down our primary system and WYPF tested operational capability from our secondary site before successfully restoring our primary site.

This took approximately 4 hours. To put in in the words of one team member:

it used to take us a full 10-hour day in DR testing (this century!) just to build one server. We use to build a single file and print server, an IIS server and a UNIX server and need 2 days.

This is our first DR test and we will test again twice in the next 12 months. As you would expect from a first time through, a great deal has been learnt and there are actions we are undertaking to improve next time.

Dashboards

The staging deadline for the L G P S and all other public service pension schemes will be deferred from 30 April 2024 to 30 September 2024.

Schemes will be expected to meet the required standards (connection, security and technical) by 30 September 2024.

They must also, by that date, be able to respond to find requests, complete matching and provide administrative and signpost data on request.

Administering authorities will need to be able to provide value data (accrued and projected values) by 1 April 2025.

WYPF have established a programme for Dashboard implementation. We meet regularly with stakeholders, including software providers to ensure we are on course to be compliant with the legislation before go live day.

We also regularly liaise with the TPR to ensure we are planning, resourcing and implementing correctly and meet with them every quarter.

6.KPI Reporting

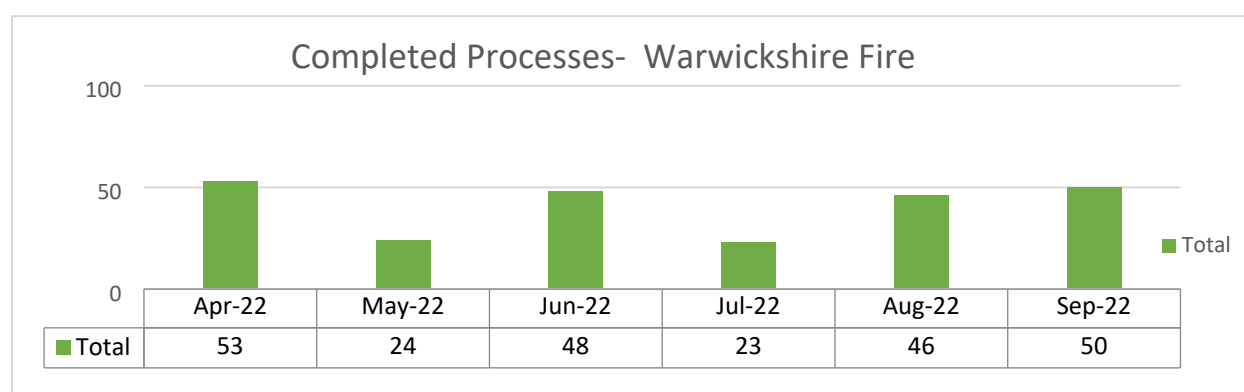
The review is still on track for a late autumn release.

IT are making some coding amendments to the KPI measures and we are looking at some possible additional amendments to our UPM processes to better align the reporting periods with the KPI measure.

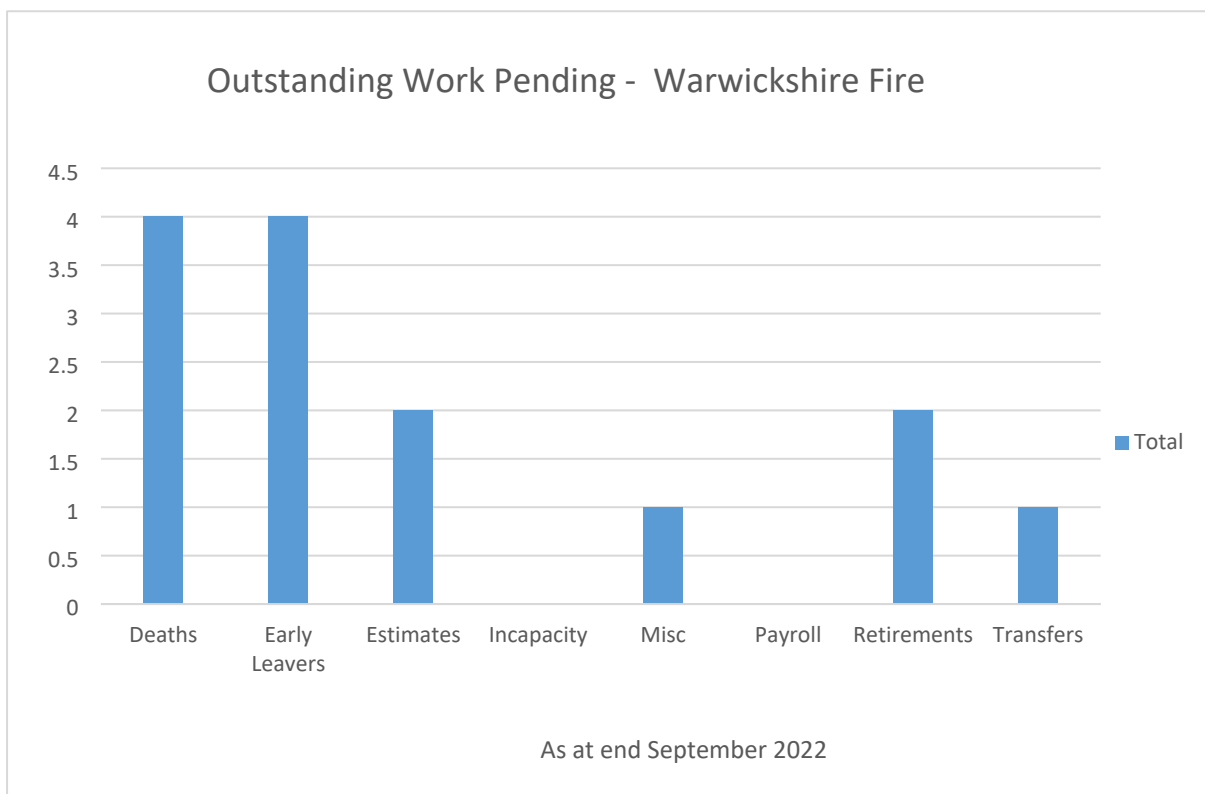
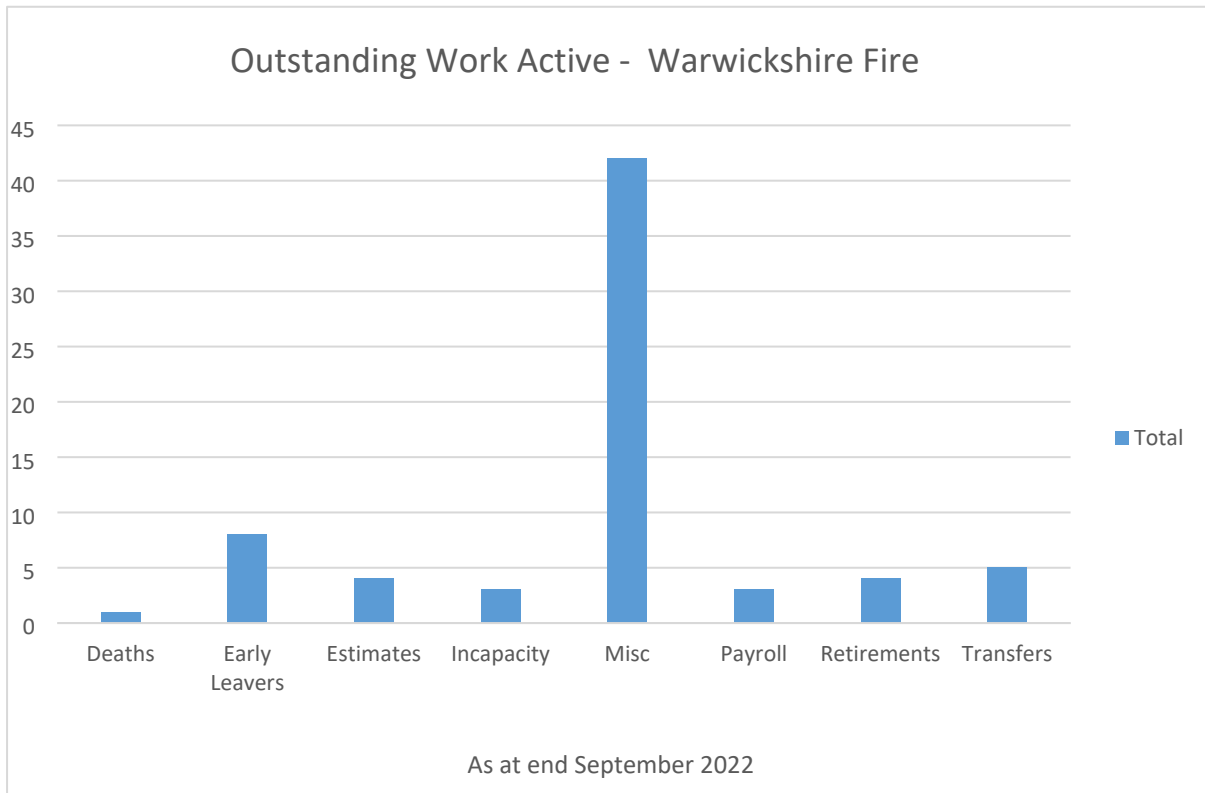
7.Key Performance Indicators

Completed processes

Warwickshire Fire (1 to 30 September 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	7
Transfer In Actual	1	10	1	85	100	2
Pension Estimate	13	10	11	85	84.62	11.23
Deferred Benefits Into Payment/Payment of Lump Sum	2	3	2	85	100	2
Set Up New Spouse Pension	1	5	1	85	100	1
Change of Address	9	20	9	85	100	2.89
Change of Bank Details	2	20	2	85	100	1
General Payroll Changes	3	20	3	85	100	1
Age 55 Increase to Pension	1	20	1	85	100	16
Life Certificate received	2	5	2	85	100	1
Death Grant Nomination Form Received	2	20	2	85	100	5
Spouse Potential	1	20	1	85	100	2
Initial letter Death in Retirement	2	10	2	85	100	1
Death in Retirement	2	5	2	85	100	1
Update Member Details	6	20	6	100	100	1
Injury Review	1	20	1	100	100	1
Payment of Spouses _Child Benefits	1	10	1	100	100	1
Monthly Pension	443	Pay date	443	100	100	



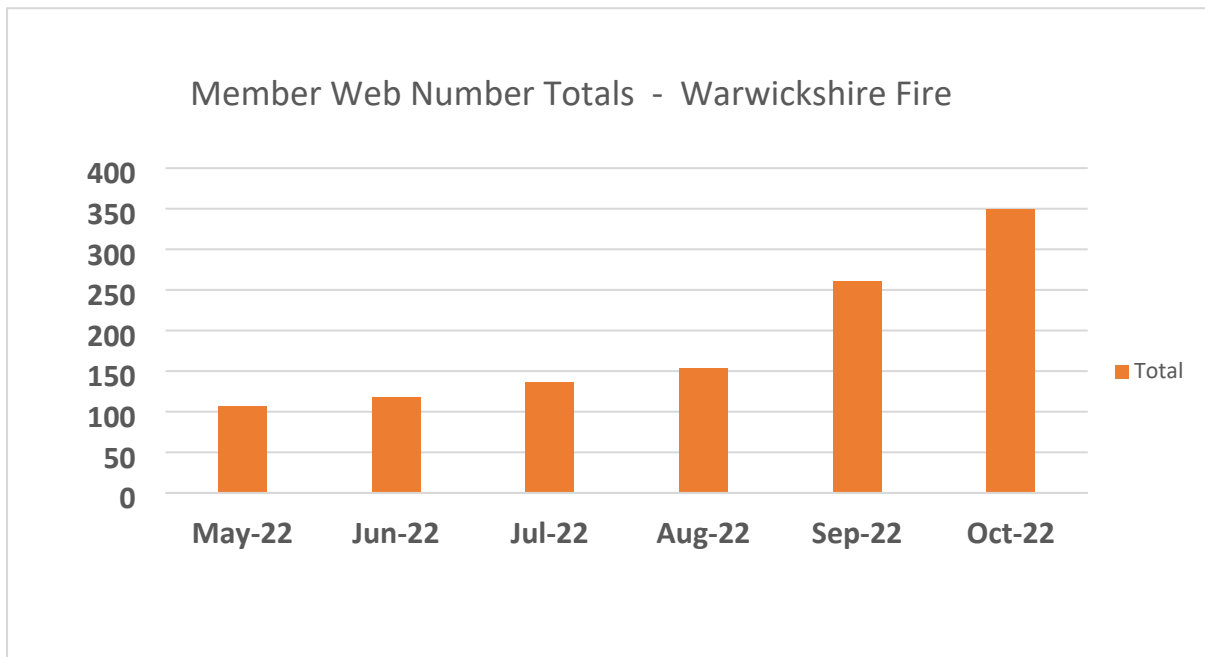
8. Work in Progress



9.Member Web Registrations

The number of members signed up to member web are:

Status	Number
Active	141
Pensioner	143
Pensioner Ex-Spouse	0
Beneficiary Pensioner	9
Deferred Ex-Spouse	0
Deferred	56

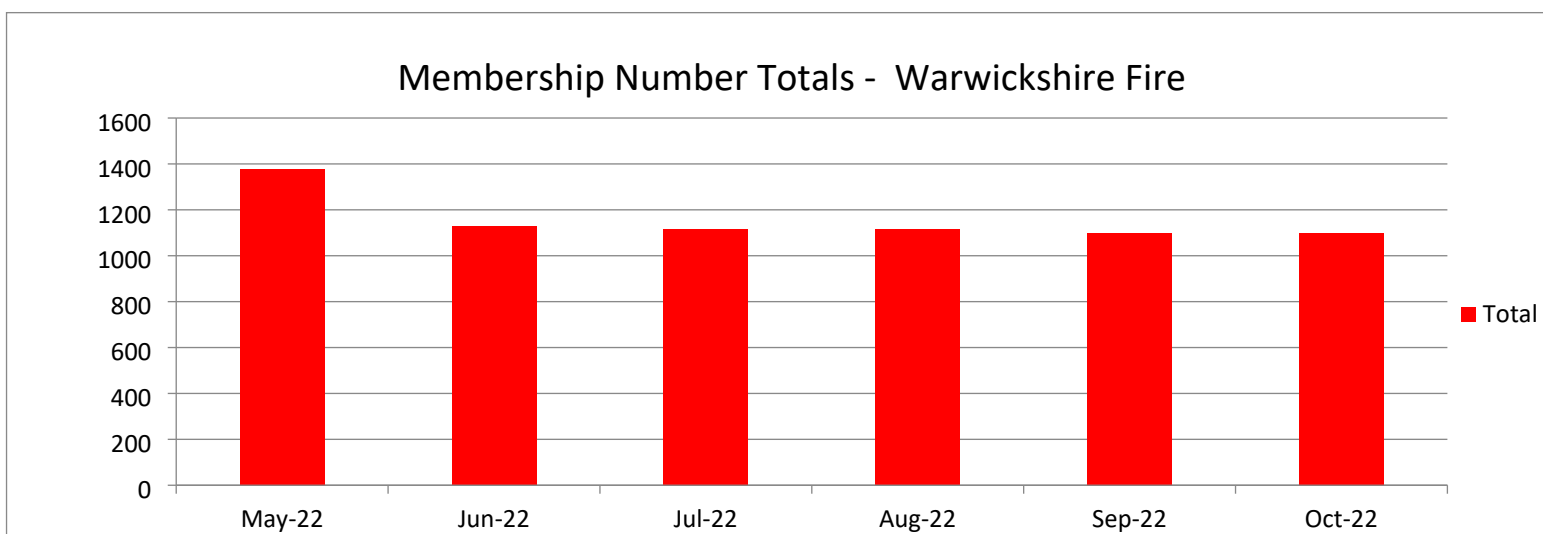


10. Calendar of Events

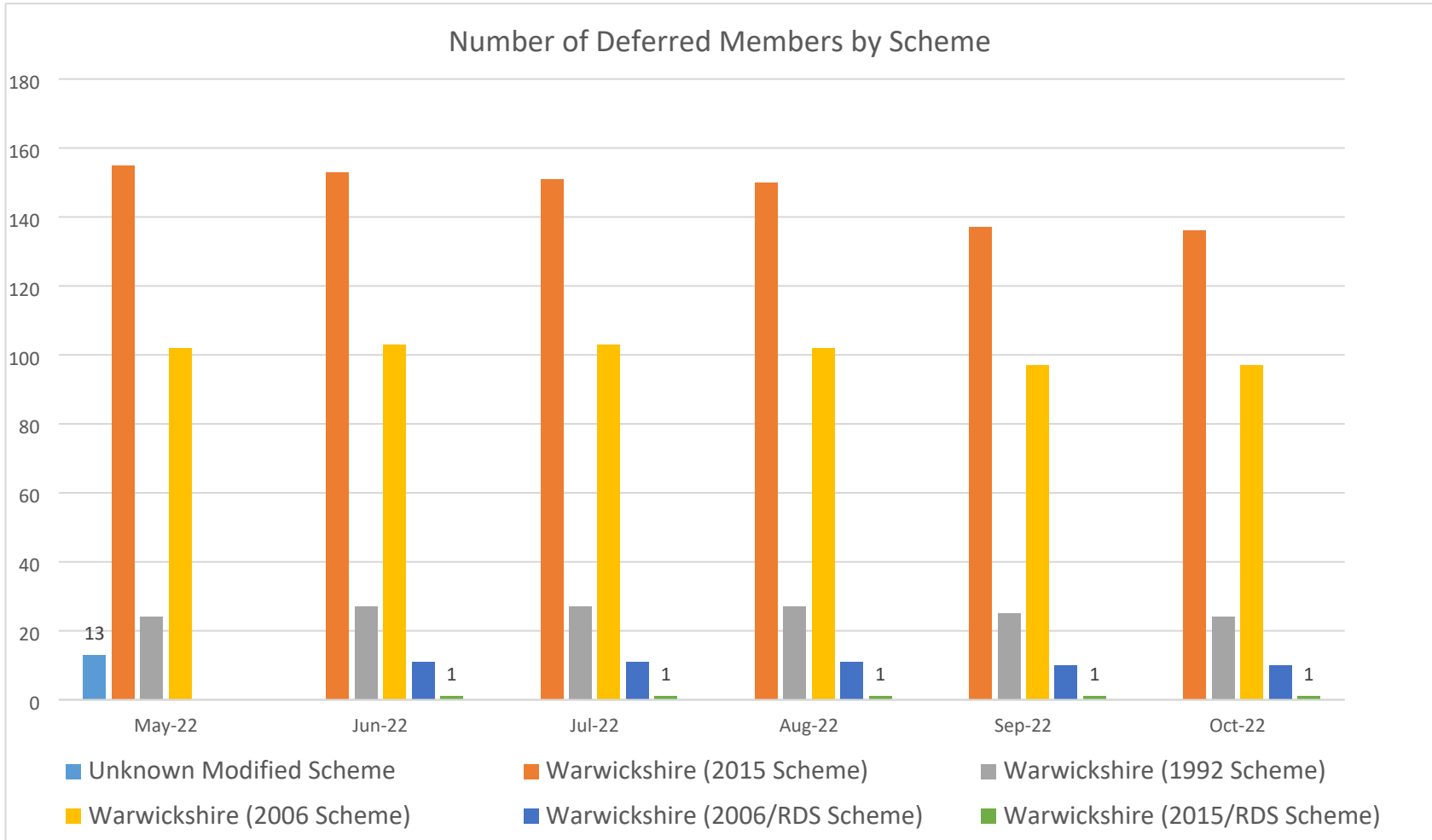
January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's 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

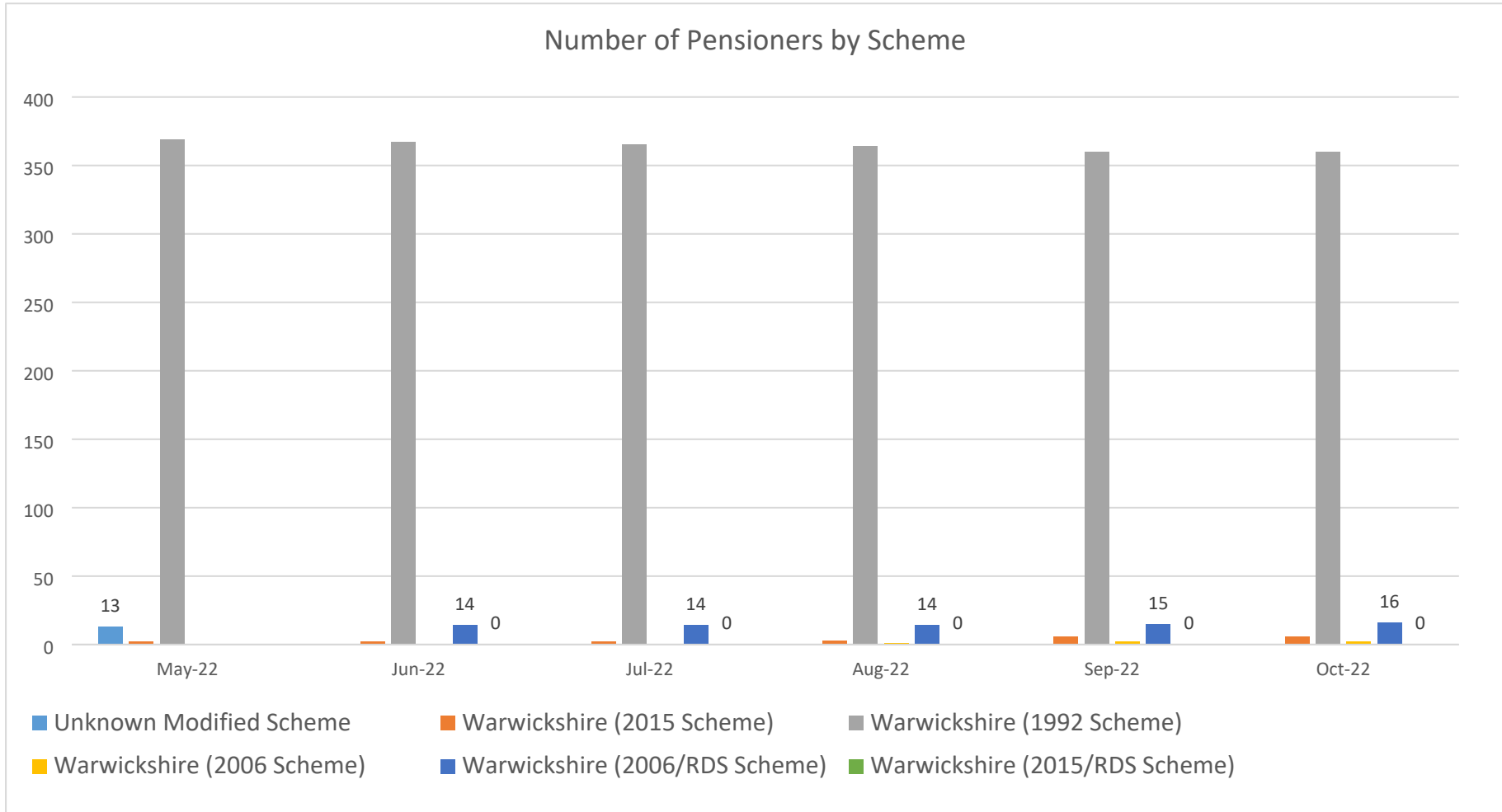
11.Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Warwickshire (1992 Scheme)	0	24	360	59	0	0
Warwickshire (2006 Scheme)	1	97	2	1	2	0
Warwickshire (2006/RDS Scheme)	0	10	16	0	0	0
Warwickshire (2015 Scheme)	372	136	6	0	3	7
Warwickshire (2015/RDS Scheme)	3	1	0	0	0	0









12.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	✓	✓	✓	✓	✓	
Audits Per Year					1	1	1	1	1	5
Benefits										
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		✓			✓	
Audits Per Year					4	5	4	4	4	21

13. Overriding Disclosure Time Limits

Disclosure Requirement	Time Limit	Number of breaches in month
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

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

7 November 2022

Governance and Policy Update

Recommendation

That the Board note and comment on the items in this report

1. Executive Summary

- 1.1 This report provides an update to the Board on regulatory and policy updates in the Firefighter Pensions Schemes arena.

2. Financial Implications

- 2.1 None.

3. Environmental Implications

- 3.1 None

4. Regulatory Update

- 4.1 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. These discussions will help to inform the drafting of secondary legislation, ahead of formal consultation early in 2023.
- 4.2 Nearly 9,000 firefighters are set to receive a pay out of £3,750 as compensation for anxiety and distress for “significant uncertainty” over their financial futures following the government’s attempts to bring in public sector pension reforms which were later found to be discriminatory.
- 4.3 The Pensions Dashboards Programme (PDP) had launched a consultation on dashboard standards and guidance and a call for input on the design

standards in July. The standards detail how pension schemes and dashboard providers operationally, technically or in practice must meet their dashboard duties. Responses to the consultation needed to be submitted by 30 August 2022. LGA have responded to the consultation, and we support this response. Particularly, the need for the dashboard system to show appropriate caveats in relation to pension scheme members relying on this information where they are planning actual retirement income amounts and pointed out the impact and complications of calculating benefits in relation to Matthews by the staging date.

- 4.4 To support scheme managers in the delivery of Matthews, the SAB, the LGA, and the Home Office are working together in the form of collaboration sessions on Matthews. The aim is to discuss Matthews legislation and policy, the interaction between Matthews and McCloud and the proposed timeline for implementation. A Matthews Technical Working Group has been set up to assist with the technical aspects of the project. The LGA has published a Matthews Project Implementation Document (PID) which sets out the scope, deliverables, and high-level timeline for the project. The PID also includes a communications plan and draft terms of reference for the SAB working group.
- 4.5 The Pensions Regulator (TPR) is sending out scheme return notices to managers of public service pension schemes in October, before submitting the scheme return. Completing the scheme return is a legal requirement and if scheme managers fail to complete and submit it by the deadline, they could be fined. WYPF will be completing the returns on behalf of WFRS.
- 4.6 On 8 August 2022, HM Treasury (HMT) issued a consultation on proposals to limit exit payments. The Government is proposing to introduce:
 - An expanded approval process for employee exits and special severance payments; and
 - Additional reporting requirements.
- 4.7 If implemented, the proposals would apply to all bodies that are classified as 'Central Government'. This does not include local authorities or bodies under devolved administration. Following discussion with the Home Office, the definition of 'local authorities' expands to cover the following:
 - Fire and Rescue Authorities
 - Fire and Rescue Services
 - London Fire and Emergency Planning Authority
 - Police and Crime Commissioner

5. Policy Updates

- 5.1 Work has been delayed on the Discretions Policy and this is now planned to be finalised ready for Staff and Pensions Committee in March 2023.
- 5.2 The revised Abatement Policy will be delivered to Staff and Pensions Committee in December.

6. Timescales associated with the decision and next steps

- 6.1 None.

Appendices

None

Background Papers

None

	Name	Contact Information
Report Author	Lisa Eglesfield, Martin Griffiths, Victoria Jenks	lisaeglesfield@warwickshire.gov.uk, martingriffiths@warwickshire.gov.uk, vickyjenks@warwickshire.gov.uk
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The report was circulated to the following members prior to publication:

Local Member(s):

Other members:

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

7 November 2022

Forward Plan

Recommendation

That the Board notes and comments on the forward plan.

1. Executive Summary

- 1.1 The report attaches a proposed work plan covering those items that it is considered should be reviewed or discussed by the Board at each quarterly meeting.
- 1.2 The plan is not intended as a definitive list, and it should be considered at each meeting and updated and amended as necessary 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, the Abatement Policy and Discretions Policy which were due to be brought to this meeting has been moved to February 2022, due to other priorities within the teams responsible for the review and revision of these policies.
- 4.2 New member training has been added for February 2022, date to be confirmed.

5. Timescales associated with the decision and next steps

None

Appendices

1. Appendix 1 - The Forward Plan

Background Papers

None

	Name	Contact Information
Report Author	Martin Griffiths, Victoria Jenks	martingriffiths@warwickshire.gov.uk, vickyjenks@warwickshire.gov.uk
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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

Q4 13 th February 2023	Q1 5 th June 2023	Q2 25 th September 2023	Q3 6 th November 2023
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
	Review of first year with new administrator		
Forward Plan	Forward Plan	Forward Plan	Forward Plan
Policies	Policies	Policies	Policies
Abatement Policy Discretions Policy Terms of Reference Conflict of interest			
New member training			

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Warwickshire Local Fire Pension Board Annual Report 2021/22

Report by The Independent Chair

Purpose of Report:

To report to board members on the activities of the Warwickshire Fire and Rescue Local Pension Board of the Firefighter's Pension Scheme and the Scheme Manager in 2021/22.

Background

The Public Service Pensions Act 2013 introduced a framework for the governance and administration of public service pension schemes, including the establishment of Local Pension Boards.

The Warwickshire Fire and Rescue Local Pension Board of the Firefighter's Pension Scheme ("the Board") was thus established. The Terms of Reference for the Board were last approved by Council on 1st July 2021.

A Scheme Manager must by law be appointed for the Firefighter Pension Schemes. For Warwickshire, the Scheme Manager is the Council's Section 151 Officer. Under the Council's scheme of delegations, the role of Scheme Manager has been delegated onwards to the Assistant Director of Finance.

Report

1. Board Membership
 - 1.1. The Board is made up of an equal number of employer and employee representatives, with an additional Independent Chair appointed directly by the Council. Mr Martin Rehorn has been the Independent Chair for the whole period.
 - 1.2. There were two changes of Board members during 2021/22, where the late Cllr Horner briefly joined the Board to be succeeded by Cllr Hammersley. There currently no vacancies.
2. Format of meetings
 - 2.1. Meetings are held four times a year on a quarterly basis with an agreed programme of reports.
 - 2.2. Meetings are held normal held virtually and advertised on the Authority's website, with one meeting a year being held in person. There have been no members of the public attending meetings to date. The meeting agenda and papers, together with the minutes of the previous meeting, are published on the Authority's website 5 days prior to the meeting date.
 - 2.3. Board members are required to declare any potential conflicts of interest to the Scheme Manager prior to each meeting, in line with the Local Firefighter Pension Board's Conflicts of Interest Policy.
3. Training
 - 3.1. The Pensions Regulator has published a Code of Practice for the governance and administration of public service pension schemes and this code sets out the

requirement for Board members to achieve and maintain knowledge and understanding sufficient to enable them to carry out the role of Board member. Board members and supporting officers have been made aware of the Code and its requirements

3.2. There have been several training opportunities for the Board, including:

3.2.1. Introduction to the Fire-fighters Pension schemes

3.2.2. McCloud/Sargeant

3.2.3. New Member Training

3.2.4. online training available on the Pension Regulator website which members of the Board are encouraged to complete.

3.3. Each Board member has completed a training needs analysis and the Board has a Training Policy. A record of all training is maintained by the Scheme Manager.

4. Board Activity

4.1. Since the Local Firefighter Pension Board was set up in 2015, the work of the Board has been shaped by the Board members and by Officers supporting the Board.

4.2. The overhaul of the governance arrangements for Firefighter Pension Schemes has continued including a review of policies and training for members of the Board.

4.3. The Board receives regular reports including

4.3.1. a report from the Pension Administration Team.

4.3.2. review of Scheme statistics

4.3.3. updates on data quality measures – in line with the Pensions Regulators requirements

4.3.4. updates on current pension issues.

4.3.5. the Fire Pension Risk Register.

4.3.6. overview of IDRPs cases (but not individual cases) and any breaches (none requiring attention this year)

5. Current Issues

5.1. Pension Scheme Administration.

5.1.1. Following the formal procurement process, Pension Administration and pensioner payroll services, were transferred to West Yorkshire Pension Fund (WYPF) from 1st April 2022. The Board monitored progress on this transfer during 2021/22.

5.2. McCloud Decision and the Treatment of Immediate Detriment Cases.

5.2.1. As a result of findings in legal action taken by retiring firefighters nationally, the transitional protections related to the 2015 Firefighters' Pension Scheme have been found to be age discriminatory.

5.2.2. Government approach to this is to legislate for change with new Regulations expected to be in place from October 2023 which will allow a scheme member to choose whether service between 1st April 2015 and 31st March 2022 is counted in the Reformed (2015) or Legacy (1992/2006) schemes.

5.2.3. Following a Court case brought by the Fire Brigades Union (FBU) – which was settled out of court – the Home Office issued guidance on how Fire Authorities should implement the changes prior to legislation being completed.

5.2.4. The Scheme Manager has sought advice from WCC legal with regard to the application of the Home Office Immediate detriment guidance.

- 5.2.5. A decision of the Employment Appeals Tribunal in February 2021 is clear that FRAs cannot defend the discrimination on the basis that they are required to follow the legislation in force.
- 5.2.6. FRAs are therefore empowered by that decision to make payments under legacy schemes.
- 5.2.7. However, the Home Office subsequently withdrew this guidance and, with the Treasury urged Fire Authorities not to make any payment until legislation was in place. This cited the potential cost of known issues and highlighted the risks of currently unknown issues emerging. The Home Office also made it clear that any costs incurred as a result of early payment would not be refunded by government.
- 5.2.8. The Board has sought assurances that the Scheme Manager has properly considered its approach to Immediate Detriment in the light of Home Office and Treasury advice; the legal consequences and potential costs and risk and potent Regulation. It is inevitable that different Scheme Managers will reach different conclusions but the Board is content that this Scheme Manager has properly considered all the factors and therefore reached a valid conclusion.

5.3. Matthews/O'Brien (On-Call/RDS Modified Scheme)

- 5.3.1. The Board has monitored the Scheme Managers preparedness for this second round of access to the modified scheme.
- 5.3.2. Whilst full details are not expected until October 2023, general processes and principles can be established, particularly where tasks cannot be undertaken by WYPF (e.g. where potential scheme members do not currently have a pension record)

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