

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

Date: Monday 25 September 2023

Time: 2.00 pm

Venue: Microsoft Teams

## Membership

Martin Reohorn (Chair)

Councillor Brian Hammersley

Caroline Jones

Sian Marsh

Paul Morley

Sally Waldron

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

5 - 8

## 2. Administration Update

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## 3. Governance and Policy Update

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## 4. Risk Register

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## 5. Forward Plan

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## 6. Any Other Business

## 7. Future Meeting Dates

To note future meeting dates as follows:

6 November 2023  
12 February 2024

All meetings to start at 2pm.

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

To download papers for this meeting scan here with your camera



## Disclaimers

### Disclosures of Pecuniary and Non-Pecuniary Interests

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

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

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

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

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

### Observing the Meeting

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

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

Monday 5 June 2023

## Minutes

### Attendance

#### Committee Members

Martin Reohorn (Chair)  
Councillor Brian Hammersley  
Caroline Jones  
Paul Morley

#### Officers

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

### Others Present

Helen Scargill, West Yorkshire Pension Fund

### 1. General

#### (1) Apologies

Apologies were received from Sally Waldron.

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

There were none.

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

The minutes of the meeting held on 15 February 2023 were approved as an accurate record, subject to a small amendment in the minute relating to the Risk Monitoring report regarding a collective claim.

## **2. Administration update - 1st year review**

The item was introduced by Vicky Jenks (Pensions Admin Delivery Lead), who explained the purpose of the report was to review the first year of the pensions administration partnership with the West Yorkshire Pension Fund. In particular the report showed progress being made regarding the submission of pay information to West Yorkshire by WCC payroll and the ongoing work relating to reconciliation of pensioner payments and overall delivery of services.

Responding to a question from the Chair, Vicky Jenks said it had taken slightly longer than anticipated to embed the new payroll process and additional training had been required. There had also been some adjustments needed to account for how West Yorkshire required data to be submitted and the work to correct any errors on the monthly extract reports. Generally however the service was now working as expected as new routines are becoming the norm and the backlog of monthly payroll reports had been caught up on. This was confirmed by Helen Scargill, who said the West Yorkshire Pension Fund was receiving the data in a timely manner and it was now the data that had been requested. Helen Scargill confirmed that the service was working well however the unexpected work due to the mismatch between the data held by admin and payroll for pensioners, had led to records needing to be checked to confirm the correct information.

Paul Morley noted an item had been raised and discussed in detail at a recent conference regarding data accuracy, and asked if it was worth having a standing item at future meetings on data accuracy in case it was a significant issue. Councillor Hammersley asked for clarification on whether issues relating to data were due to system or human error. Vicky Jenks said firefighter pension schemes consisted of ten different categories that had different regulations, which made them complex to administer, and errors could be caused by the software and by the wrong indicators being inputted manually. She said part of the reason for having the partnership with the West Yorkshire Pension Fund was to provide greater resilience and staff knowledge of pensions administration. It was hoped the improvements in data quality would continue as the partnership developed over time, although it was accepted there may be some further historic issues that would need resolving in the future. The Chair said the Hereford and Worcester Fire and Rescue Service had noticed a similar pattern when its pension scheme started to be administered by West Yorkshire.

Paul Morley accepted pensions administration was becoming increasingly complex and stated his belief the West Yorkshire Pension Fund were providing a good service. However he said the errors from the various sources could accumulate and become a greater issue affecting people's pensions that could significantly impact payment of pensions due in the future. He said he had been contacted by some scheme members who had noticed problems with their pension contributions deducted from their pay. Liz Firmstone (Service Manager – Transformation) said she would liaise with Paul Morley about those issues to see if any training needed to be implemented between fire pensions and payroll to address the issues at source. Vicky Jenks said data quality was on the risk register as it was a known ongoing issue where improvements needed to be made. Councillor Hammersley said monitoring would help pick up on any regular trends that could be corrected at source.

The Chair said there should be a short item on the agenda of the next meeting providing an update on issues relating to data quality and accuracy, including the source of the problems and what had been done to rectify them. This would be done as a summary and would not go into detail of

individual cases. This report would be done on a trial basis to see if it needed to be provided as a standing item at all future meetings.

Vicky Jenks also drew members' attention to the report referring to two KPIs that had not been delivered, although neither of these were considered to be concerning matters.

### **3. Governance and Policy Update**

The item was introduced by Vicky Jenks. She reminded members the Home Office had published a consultation on the firefighter's pension scheme and remedial service regulations on 28 February 2023. This had closed on 23 May and a note had been circulated to stakeholders notifying them of this. This consultation is for the second part of the remedy that is required to rectify benefits and give members the deferred choice option when they retire, namely whether to take legacy (final salary) benefits or Reform (CARE) benefits for the remedy period from 1 April 2015 to 31 March 2022) Vicky Jenks said the LGA had raised questions about the consultation as some of the draft regulations do not appear to deliver what is expected.

A consultation on the second retained modified exercise was ongoing.

There had been changes relating to tax announced in the most recent Budget. These have been communicated with active members who would be affected by the changes. Vicky Jenks said the Council had so far only communicated with current active members using the internal email facility. Information had not yet been shared with deferred members. It was not known if the information would be included on the annual benefit statements for deferred members. Some benefit calculations (transfers) had been suspended while the administrators waited for new factors to be released.

The Chair said the LGA response to the remedy consultation appeared to say that immediate detriment that had been paid prior to remedy had not been adequately dealt with. Vicky Jenks said the Warwickshire Pension Fund would continue to monitor any developments relating to the remedial scheme.

The retained firefighters pensions consultation would be closing on 9 June. It was likely anything the Warwickshire Fire and Rescue Service had to say in relation to this would be a duplication of the LGA submission. The Fund would look out for any response from the LGA on this consultation.

### **4. Risk Register**

Vicky Jenks told members a new item had been added to the risk register specifically relating to the second modified exercise for retained, because there was a risk with that project as the Council may not have all of the pay data required to calculate someone's benefits. Associated to it was the risk that the Council had not been able to get in contact with all those in scope, and how this could affect delivery of the project. This piece of work would need to be completed by the members of the Pensions Administration team at Warwickshire as the West Yorkshire Pension Fund did not have access to the pay data for people who were not currently in a pension scheme. Vicky Jenks said a project team was in the process of being established to consider what needed to be done and how it would be delivered, drawing on lessons learnt from the first modified exercise. It was likely there would be sufficient resources within Warwickshire to complete the project.

## 5. Forward Plan

Following discussions it was agreed that training relating to the modified scheme be deferred until November, as the regulations were not due to take effect until after the next scheduled round of training in September. It was agreed to hold an overview session and a technical session at a later date.

Vicky Jenks acknowledged Councillor Hammersley was still in need of new member training. Sally Waldron would also require this training, but there was also still a vacancy on the Board. It was agreed the new member training would take place after the position had been filled. The Chair said two new members had recently joined the Board at Hereford and Worcester, and suggested a joint training session involving them as well.

## 6. Any Other Business

There were no additional items to discuss.

## 7. Future Meeting Dates

Members noted the future meeting dates.

The meeting rose at 2.39pm

.....  
Chair



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

**25 September 2023**

### **Recommendation**

That the Warwickshire Fire and Rescue Local Pension Board notes and comments on the administration report provided by West Yorkshire Pension Fund (WYPF) dated July 2023 for the work they have undertaken to administer the Firefighter Pension Schemes for Warwickshire Fire and Rescue Service (WFRS).

### **1. Executive Summary**

- 1.1 From 1 April 2022 WYPF have provided the pension administration service for WFRS. As part of this service a monthly report is provided by WYPF, which give details of the work they have undertaken, key performance indicators and other relevant information regarding the membership of the Firefighter Pension schemes.

### **2. Financial Implications**

- 2.1 None.

### **3. Environmental Implications**

- 3.1 None.

### **4. Supporting Information**

- 4.1 The latest report provided by WYPF is for July 2023 and is attached at Appendix 1.
- 4.2 The report has been shared with stakeholders at the Council.

- 4.3 In relation to KPIs, all have been completed within the target timescales.
- 4.4 We continue to monitor the submission of data from WCC payroll to WYPF to ensure the data is correct and submitted on time. This is now being achieved on a more consistent basis, with fewer queries being raised by WYPF.
- 4.5 WYPF have nearly completed the reconciliation for pensioner payments. In the next meeting information will be provided on the total number of cases that have been assessed.
- 4.6 The second retained modified exercise will commence from 1 October 2023 when the draft Firefighters' Pension Scheme 2006 (England) (Amendment) Order 2023 is laid before Parliament for certain retained officers to be eligible for pension scheme membership. A working party has been established, led by the Pensions Administration Delivery Lead, in order to assess the work required and who the responsible officers will be. A project plan has been created to record this information and the estimated cost to deliver the project. The majority of work for this will need to be undertaken by WCC, with WYPF only becoming involved when a member makes a positive election to buy back service.

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

- 5.1 None

## Appendices

Appendix 1 – July 2023 monthly report

## Background Papers

None

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Executive Director	Rob Powell Executive Director	robpowell@warwickshire.gov.uk
Portfolio Holder	Portfolio Holder for Finance and Property	peterbutlin@warwickshire.gov.uk

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

Local Member(s):

Other members: Cllrs Dahmesh and Gifford

# Monthly Report

July 2023

Warwickshire Fire Authority



**West Yorkshire Pension Fund**

Prepared by:

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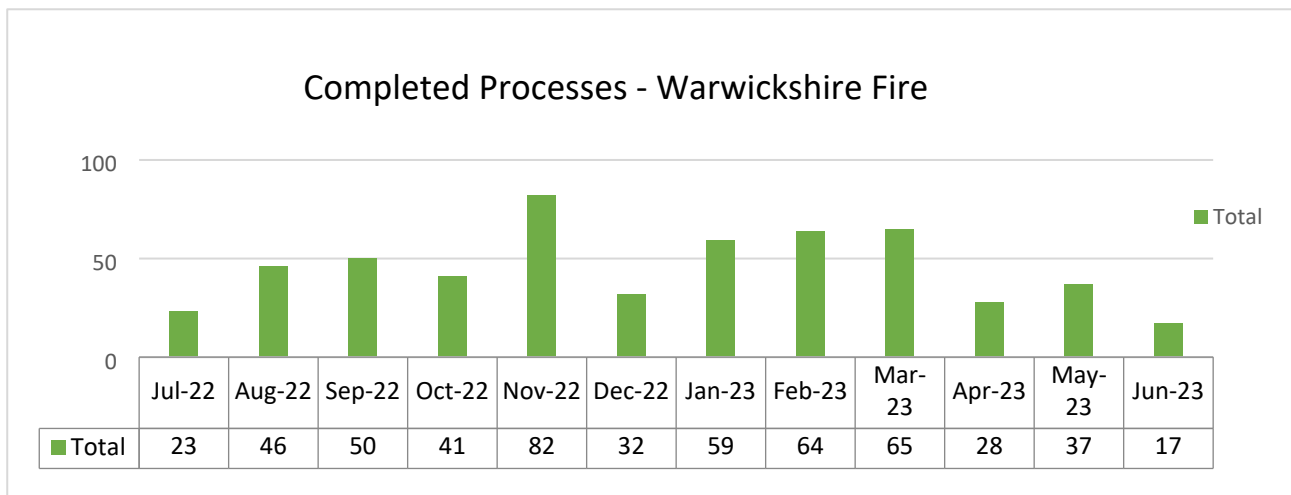


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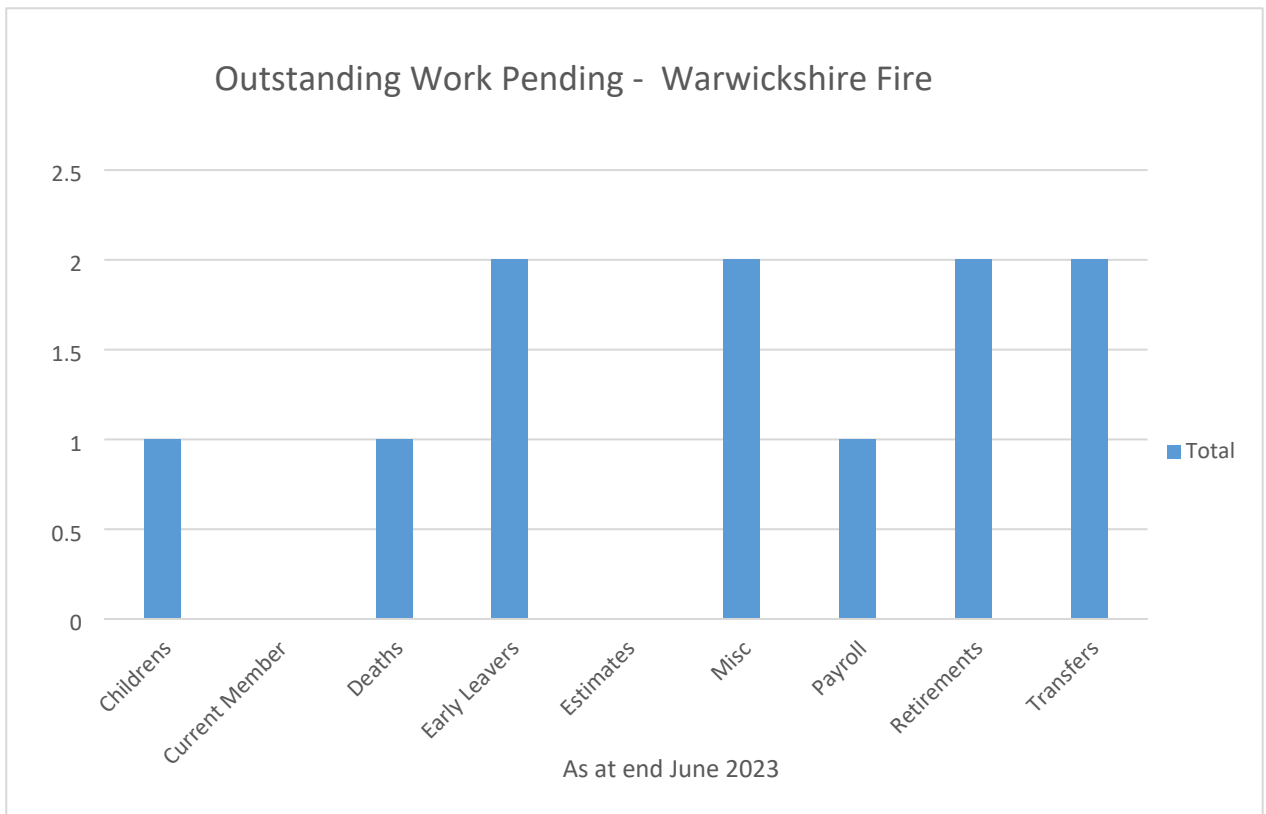
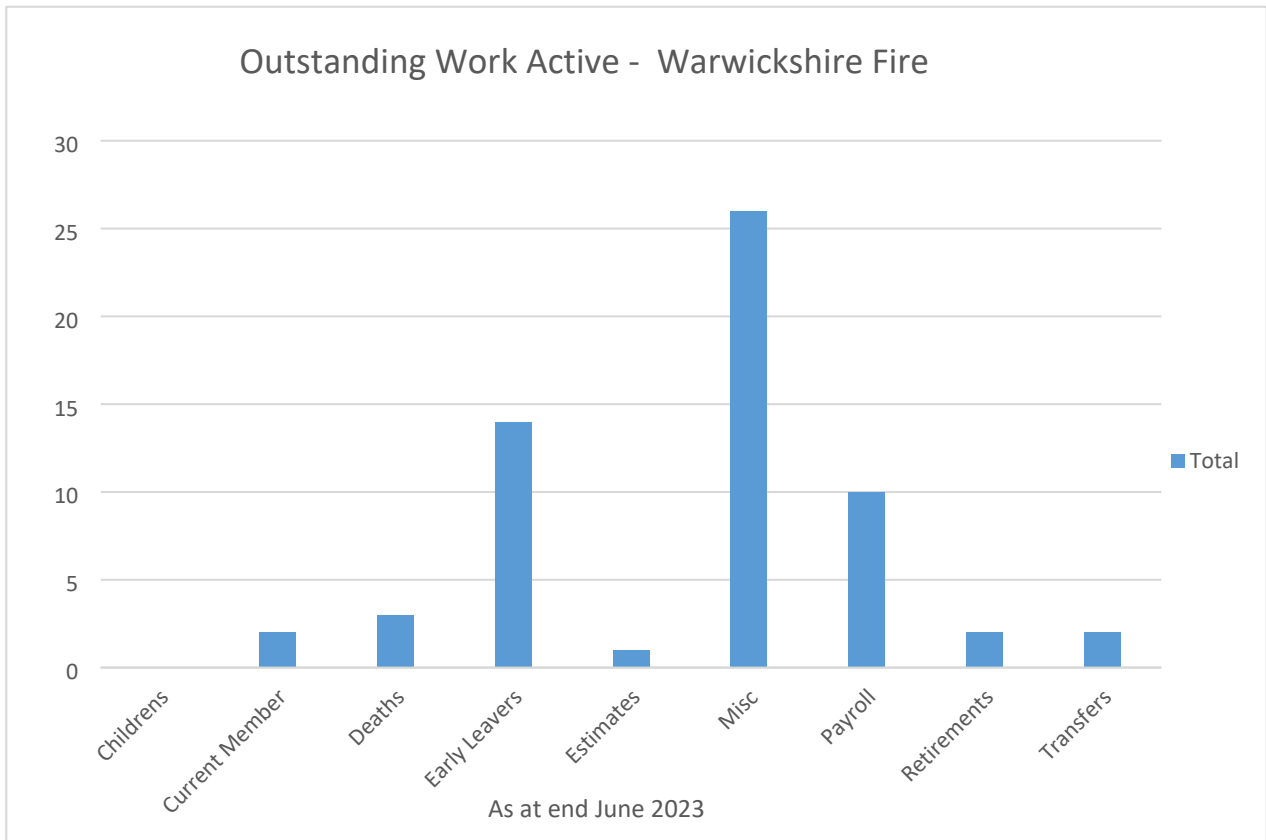
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## 1. Completed processes

1 to 30 June 2023						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Set Up New Spouse Pension	1	5	1	85	100	3
Change of Address	3	20	3	85	100	2
General Payroll Changes	8	20	8	85	100	8.5
Death in Retirement	2	10	2	85	100	3
Update Member Details	1	20	1	100	100	1
Injury Review	1	20	1	100	100	1
Dependant Pension To Set Up	1	10	1	100	100	1
Monthly Pension	460	Pay date	460	100	100	



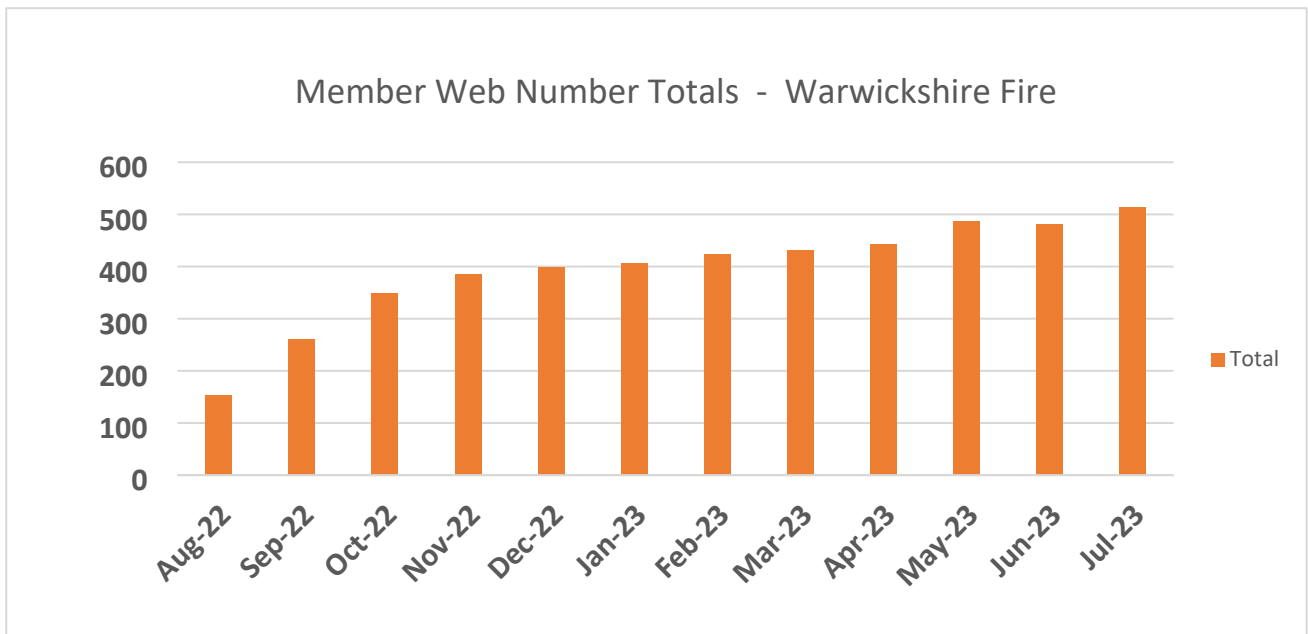
## 2. Work in Progress



### 3. Member Web Registrations

The number of members signed up to member web are:

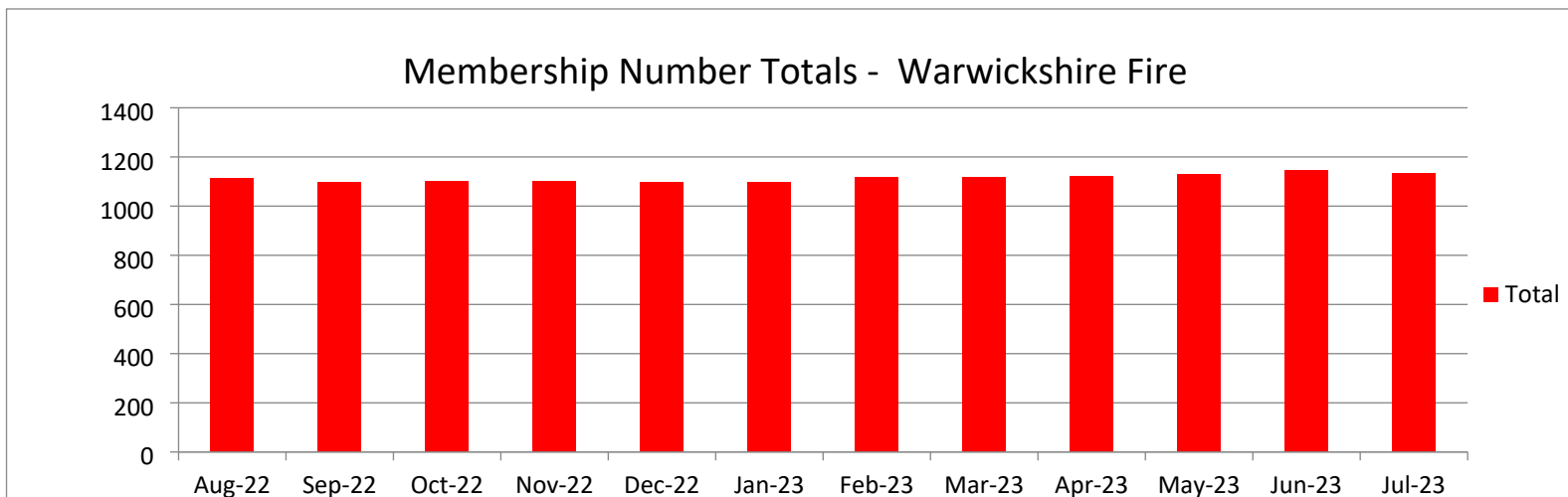
Status	Number
Active	178
Pensioner	241
Pensioner Ex-Spouse	0
Beneficiary Pensioner	19
Deferred Ex-Spouse	0
Deferred	78

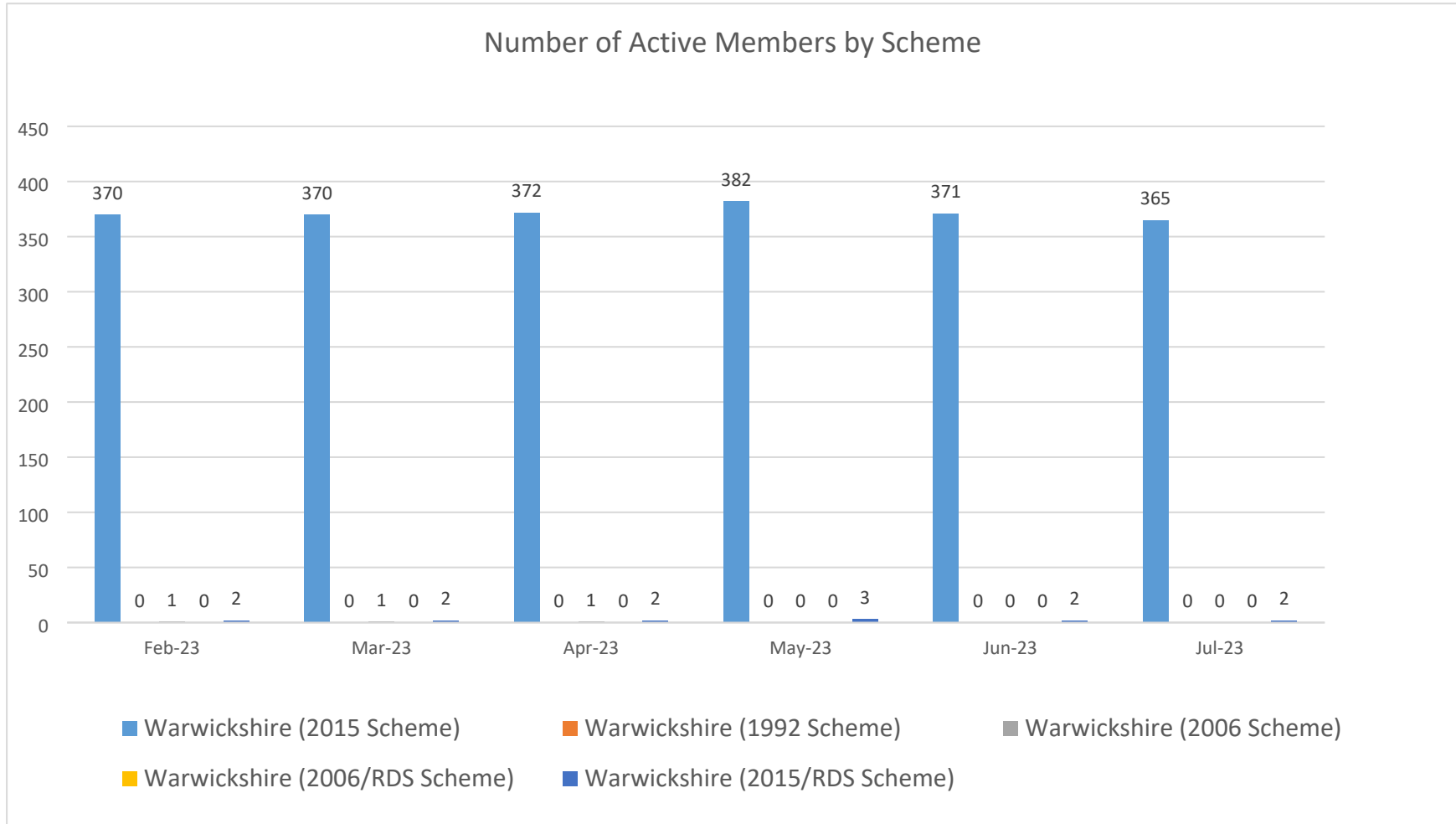


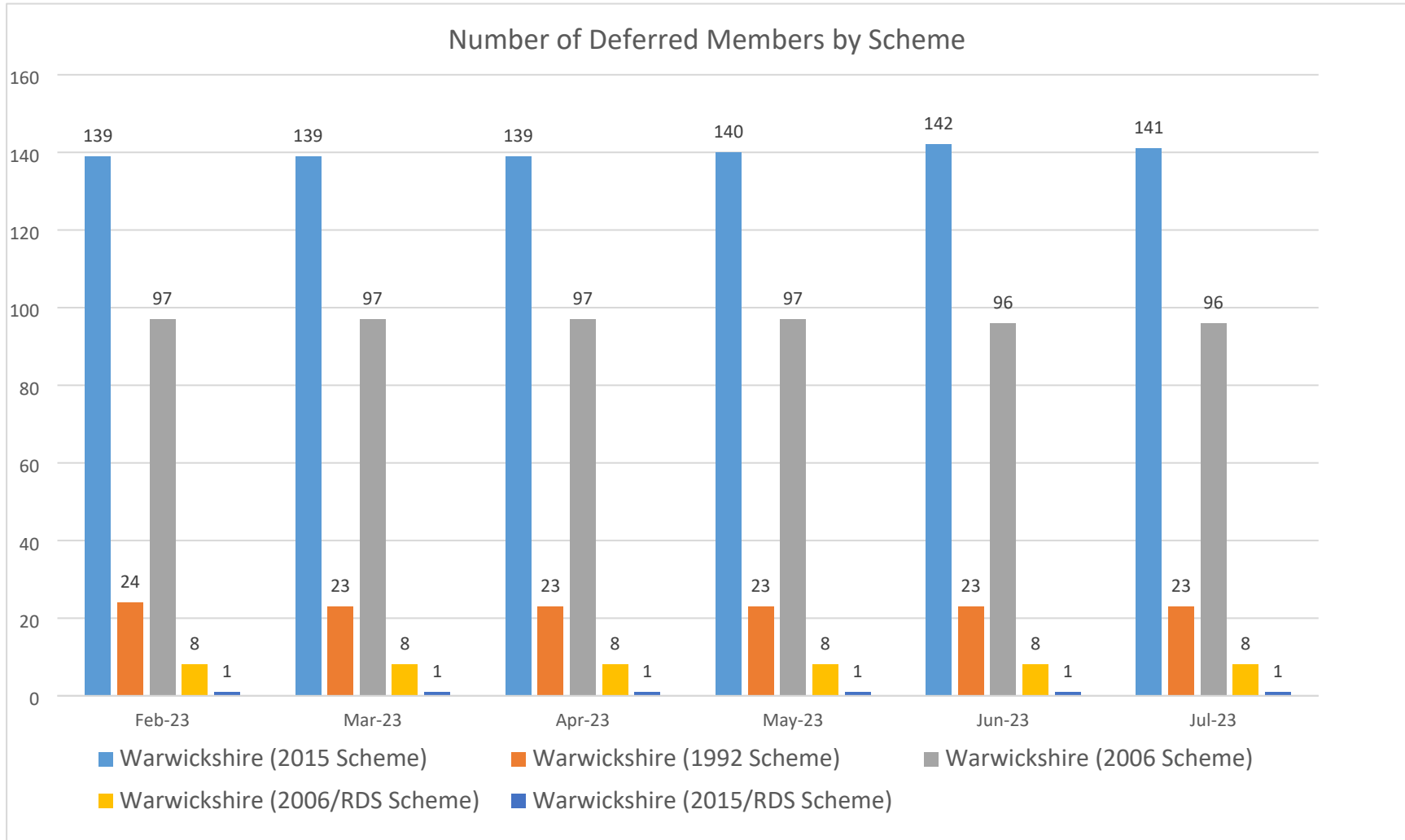


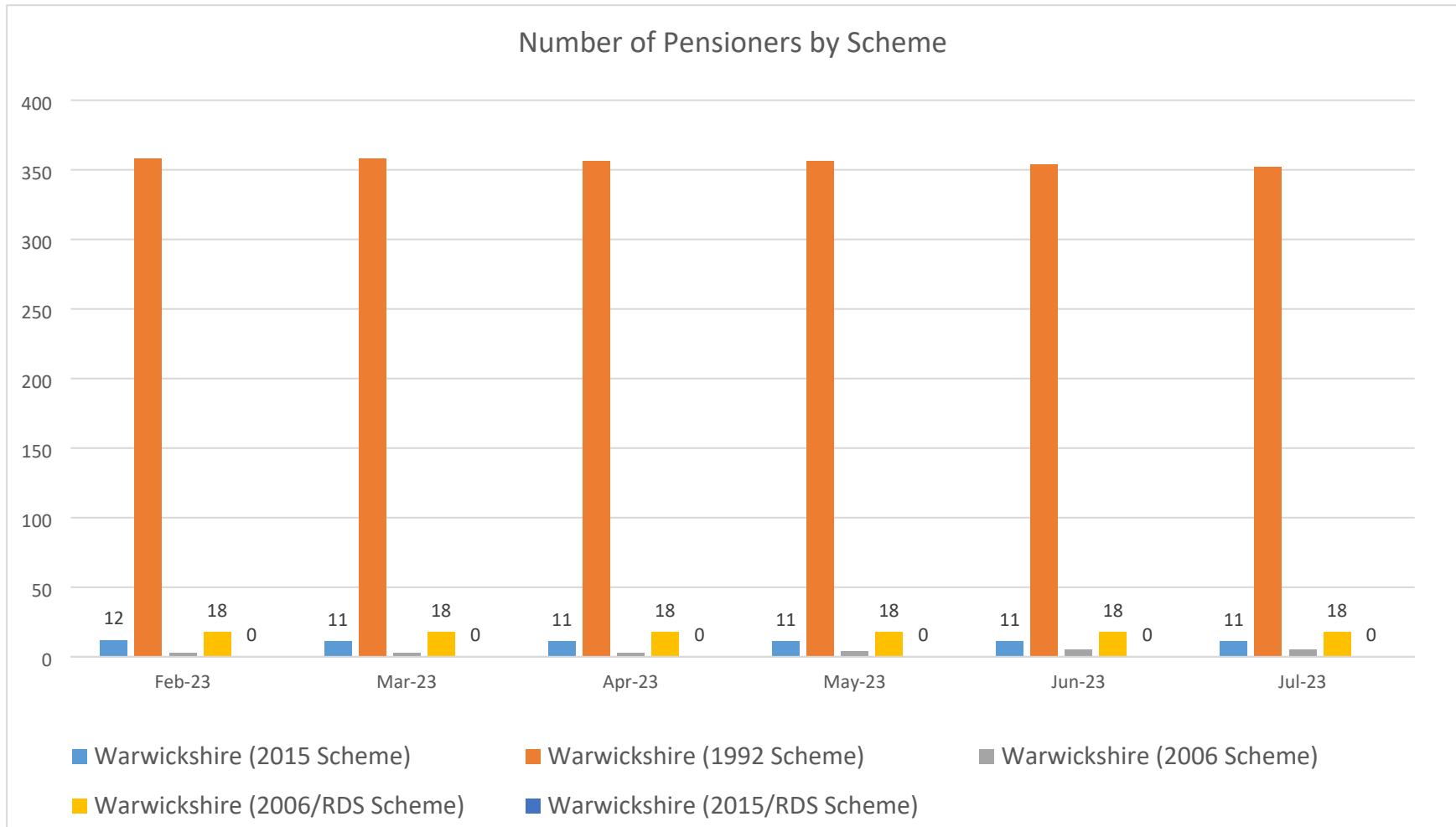
## 4.Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Warwickshire (1992 Scheme)	0	23	354	63	0	0
Warwickshire (2006 Scheme)	0	96	5	1	2	0
Warwickshire (2006/RDS Scheme)	0	8	18	0	0	0
Warwickshire (2015 Scheme)	371	142	11	4	3	41
Warwickshire (2015/RDS Scheme)	2	1	0	0	0	1









## 5. Administration Update

At the LGA Coffee Morning on 11 July there was some concern amongst FRAs about the ability to pay retirements in October.

Currently Fire fighters intending to retire in October cannot be sent a Retirement Pack, because that would have to include an RSS and all their various options. As discussed, the RSS is mandatory post 30 September and is not yet available for administrators to use.

We also don't know when the RSS will be available and so cannot confirm at the moment when we will be in a position to supply the Retirement Pack and if this issue will mean a delay in the payment of Post October retirement benefits. We will, of course, keep you updated as things progress.

You can, however, be assured WYPF will meet legislative requirements and if necessary seek further guidance on this issue.

Please ensure that you request a pension estimate for any member looking to retire between 1 October 2023 and 31 December 2023. WYPF will be able to supply the legacy figures provided you have completed and returned the disclaimer sent earlier this year.

### Data breaches

None

## 6. Communication & Training

### Keeping in Touch

If you've missed any Hot Topics communications, please head over to the fire client news blog [here](#) and sign up for updates.

### Pension boards

- Warwickshire – 5 June
- Buckinghamshire – 7 June
- Derbyshire – 8 June
- Northamptonshire – 9 June
- Staffordshire – 9 June
- Cambridgeshire – 13 June
- Lincolnshire – 15 June
- Devon & Somerset – 21 June
- Nottinghamshire – 30 June

### National / regional meetings

- X Whitehall TWG – 1 June
- Tax Consultation (2) with HMRC – 2 June
- Fire Scheme Advisory Board (SAB) – 8 June
- Civica – P&F McCloud TWG – 13 June
- P&F Stakeholders – Remedy – 13 June
- NERFOG – 14 June
- Fire Technical meeting – 20 June
- SAB – Valuation 2020 Assumptions
- P&F Stakeholders – Remedy – 27 June
- Valuation 2023 (GAD) – 28 June

- X Whitehall TWG – 29 June

### **Client training delivered by WYPF**

- Staffordshire Pre Retirement – 14 June

### **Financial Data Extract Discussions**

- East Sussex
- South Yorkshire
- Devon & Somerset
- Lincolnshire

## **7. Member Update**

None

## **8. IT Update**

None

## 9. Five Year Audit Plan 2019 – 2024

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

**10. Overriding Disclosure Time Limits**

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



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

## 11. 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

## 12. 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 70 - June 2023 \(fpsregs.org\)](https://www.fpsregs.org/)

Some key issues to highlight:

### FPS

#### **Consultation on the retained Firefighters' Pensions: Proposed changes to the Firefighters' Pension Scheme (England) 2006**

In [FPS Bulletin 68 – April 2023](#) we informed you that the above consultation had been launched. The LGA has responded to the consultation and our response is available on the [Consultations section](#) of the Firefighters' Pension Schemes Regulations and Guidance website.

**ACTION:** FRAs and administrators to familiarise themselves with the response, for information ahead of the Home Office's response to the consultation

#### **Consultation on The Public Service Pension Schemes (Rectification of Unlawful Discrimination) (Tax) (No.2) Regulations 2023**

In [FPS Bulletin 69 – May 2023](#) we informed you that the above consultation had been launched. The LGA has responded to the consultation and our response is available on the [Consultations section](#) of the Firefighters' Pension Schemes Regulations and Guidance website.

**ACTION:** FRAs and administrators to familiarise themselves with the response, for information ahead of HMRC's response to the consultation.

#### **Data Collection for 2015 remedy**

In [FPS Bulletin 44 – April 2021](#) and [FPS Bulletin 66 – February 2023](#) we advised that remedy data collection tools had been developed with the assistance of software suppliers and the Fire Communications Working Group to help FRAs to collect the relevant data needed to prepare for the 2015 remedy exercise.

In [FPS Bulletin 69 – May 2023](#) we covered the Fire and Police data conference event and the workshop feedback coffee morning, which both raised concerns by administrators and software suppliers that not all FRAs had been in a position to provide the relevant data.

There are no assumptions made for missing data within the Police and Firefighters' Pension Schemes (Amendment) Regulations 2023 and FRAs should be near completion of the collection of this data. It is imperative that for administrators to be able to commence the remedy options exercise in October 2023, that they receive this data in good time.

The data collection template and notes are as follows:

[FPS remedy data collection template](#)

[FPS remedy data collection notes for completion](#)

[Age discrimination remedy data collection - Guidance for administrators and FRAs – version 2 clean](#)

## **Government Actuary's Department (GAD): Data Projects and Long-Term Strategy**

In [FPS Bulletin 69 – May 2023](#) we provided an overview of the Fire and Police Data Conference which took place on 17 May 2023.

We reflected on the importance of data for setting long term strategy about the management of pensions and ultimately supporting FRAs. GAD have now published [a news feature](#) reflecting on the event as well as covering a broader focus on data generally.

In the article GAD refers to a blog they have written about Pensions Dashboards, where they compared the matching process to a game of Guess Who. They then referenced pensions administration projects to another board game that I am sure we are all aware of where they urge the bankers (scheme managers) to invest time in the game to prioritise the experience of the players (the members) and provide an exceptional service.

**ACTION:** FRAs are advised to read GAD's write up of the event and their broader focus on data

## **SAB updates**

### **SAB response to the Consultation on retained Firefighters' Pensions: Proposed changes to the Firefighters' Pension Scheme (England) 2006**

In [FPS Bulletin 68 – April 2023](#) we informed you that the above consultation had been launched. The Scheme Advisory Board has responded to the consultation and the response is available on the [Consultations section](#) of the Firefighters' Pensions SAB (England) website.

**ACTION:** FRAs and administrators to familiarise themselves with the response, for information ahead of the Home Office's response to the consultation.

### **SAB response to HMRC Consultation on The Public Service Pension Schemes (Rectification of Unlawful Discrimination) (Tax) (No.2) Regulations 2023.**

In [FPS Bulletin 69 – May 2023](#) we informed you that the above consultation had been launched. The Scheme Advisory Board has responded to the consultation and the response is available on the [Consultations section](#) of the Firefighters' Pensions SAB (England) website.

**ACTION:** FRAs and administrators to familiarise themselves with the response, for information ahead of HMRC's response to the consultation

## **Other News and Updates**

### **McCloud – unions granted right to appeal cost cap mechanism**

The Court of Appeal has granted unions permission to appeal against the recent High Court judgement over the government's proposed method of paying for costs incurred by the McCloud ruling in public sector schemes. See [FPS Bulletin 67 – March 2023](#) for more information.

## **Pensions Dashboard Programme**

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On 8 June 2023, a [Ministerial Statement](#) was made to announce that as part of the reset of the Pensions Dashboard Programme, amending legislation will be laid to amend the Pensions Dashboard Regulations 2022.

On 9 June 2023 the Department for Work and Pensions (DWP) laid draft [Pensions Dashboards \(Amendment\) Regulations 2023](#).

The amending regulations remove the phased staging timeline, replacing it with a single connection deadline of 31 October 2026. The regulations will allow the DWP and the Money and Pensions Service (MaPS) *to issue guidance setting out a staged connection timeline for individual schemes, to which FRAs must have regard*. MaPS aim to collaborate with industry on the guidance later this year.

**Please note:** Although the connection deadline has moved to 31 October 2026, WYPF are still working towards the original timelines provided. Furthermore, additional information will be received before the summer recess and we will be provided with a revised staging date. All FRAs should be aware this may likely be earlier than 31 October 2026.

## Events

### FPS AGM – London – 19 to 20 September 2023 (save the date)

The Fire Pensions Annual Conference will take place from 19 to 20 September this year. The two-day programme will allow delegates to network with fellow colleagues and hear the latest news on the Firefighters' Pension Scheme from the scheme's key stakeholders. The full programme and booking link will be available in due course.

## Legislation

Acts

[Legislation Acts Pensions Dashboards \(Prohibition of Indemnification\) Act 2023](#)

## 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](#)



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

25 September 2023

### Governance and Policy Update

#### Recommendation

That the Warwickshire Fire and Rescue Local Pension Board notes and comments on the Regulatory updates affecting Firefighter Pension Schemes set out in this report.

#### 1. Regulatory Update

- 1.1 On 19 July, the Home Office published the government's formal response to the consultation on retrospective remedy. The Firefighters' Pensions (Remedial Service) Regulations 2023 were laid on 20 July 2023 and come into effect on 1 October 2023.
- 1.2 The Local Government Association (LGA) have informed both Fire Authorities and administrators, through their monthly bulletins, actions that should be taken in order to be ready for 1 October 2023. A data collection exercise has already been undertaken to provide WYPF with the information required for members in scope.
- 1.3 The LGA have been made aware of potential pension scams involving companies offering to help members in public sector pensions schemes 'claim' their 2015 remedy benefits. LGA have provided wording to be added to websites to inform members of the possibility of being contacted regarding this. This has been added to the Warwickshire Pension Fund website.
- 1.4 The Government Actuaries Department (GAD) have been reviewing and revising factors used when calculating benefits following the update to the <sup>1</sup>SCAPE discount rate, this has led to a delay in processing some cases. In most instances the new factors provide better outcomes for members.
- 1.5 On 9 June 2023, the Department for Work and Pensions (DWP) laid draft Pensions Dashboards (Amendment) Regulations 2023. The amending regulations remove the phased staging timeline, replacing it with a single connection deadline of 31 October 2026. The regulations will allow the DWP and the Money and Pensions Service (MaPS) to issue guidance setting out a

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<sup>1</sup> Superannuation contributions adjusted for past experience.

staged connection timeline for individual schemes, to which FRAs must have regard. MaPS aim to collaborate with industry on the guidance later this year.

- 1.6 On 31 March 2023, the Home Office launched the formal consultation on Retained Firefighters' Pensions: Proposed Changes to the Firefighters' Pension Scheme (England) 2006. This consultation closed on 9 June 2023. The second retained modified exercise will commence from 1 October 2023 when the draft Firefighters' Pension Scheme 2006 (England) (Amendment) Order 2023 is laid before Parliament for certain retained officers to be eligible for pension scheme membership.
- 1.7 The LGA issued a response to the consultation, setting out concerns with regard to the time scales for which the work required for this exercise would need to be undertaken. The legislation for this will be in place from 1 October 2023, this is the same time as Age Discrimination legislation, putting a tremendous amount of pressure on Fire Authorities and administrators. We await the response from the Home Office with regard to these concerns.
- 1.8 A training log has been created to record training undertaken by board members. This will be reviewed on a regular basis to ensure board members are completing the necessary training.

#### **Policy update**

There are no policies set for review in this quarter.

## **2. Financial Implications**

- 2.1 None arising directly from this report.

## **3. Environmental Implications**

- 3.1 None arising directly from this report.

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

- 4.1 None

## **Appendices**

None



## Background Papers

None

	<b>Name</b>	<b>Contact Information</b>
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The report was circulated to the following members prior to publication:

Local Member(s): n/a

Other members: Cllrs Dahmesh and Gifford

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

**25 September 2023**

### **Risk Register**

#### **Recommendation**

That the Warwickshire Fire and Rescue Local Pension Board note and comment on the report and the attached risk register.

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

- 1.1 The Pensions Administration Service (PAS) maintains the risk register in order to manage the risks facing the administration of the Firefighters' Pension Schemes.
- 1.2 Risks are identified and responsibility is allocated to either Warwickshire County Council as the Scheme Manager or West Yorkshire Pension Fund as the third-party administrator.

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

None

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

None

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

- 4.1 The register has been reviewed and no changes or additions have been made.

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

- 5.1 Policy Schedule work is still outstanding and will be picked up in the new year.

- 5.2** Officers are concentrating on delivery of age discrimination remedy and the second modified exercise. The second retained modified exercise will commence from 1 October 2023 when the draft Firefighters’ Pension Scheme 2006 (England) (Amendment) Order 2023 is laid before Parliament for certain retained officers to be eligible for pension scheme membership.

**Appendices**

Appendix 1 – Risk Register

**Background Papers**

None

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

Local Member(s):

Other members: Cllrs Dahmash and Gifford

FIRE PENSIONS ADMINISTRATION - RISK SHARING PROPOSAL															
Jun-23															
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)	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	15	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)					Investing in systems development	Provider					
				Erosion of staff capacity/resilience due to long term remote working	Key administration performance measures not met				Use of management information to monitor and manage performance	Provider					
				Inability to recruit / retain appropriately skilled staff					Succession planning arrangements are in place	Provider					
				Inability of the officers to keep up with demand (capacity or skills)					Data quality reviewed at least annually	Provider					
				Persistently increasing customer expectations											
				Unpopular government decisions impacting on Fire Pension Schemes											

3	Lack of capacity or competence to act as intelligent client and effective Scheme Manager	WCC	Averse	Outsourcing of delivery	• Quality of services reduces	5	3	18	Medium term forecasting of demand and planning for the capacity and resources required	provider	2	3	9	Collaboration with other Fire Authorities using same provider for continuous improvement	WCC
				Growth in complexity	• Governance failures				Investing in quality and productivity of staff through training and development	provider					
				New and complex regulations (e.g. Sargeant (Age discrimination, Miller retained Modified cases)	• Key administration performance measures not met				Use of management information to monitor and manage performance	both					
				Erosion of staff capacity/resilience due to long term remote working					Succession planning	both					
				Inability to recruit / retain appropriately skilled staff					Data quality reviewed at least annually	WCC					
				Inability of the officers to keep up with demand (capacity or skills)					Maintain strong working relations with provider and other key stakeholders	WCC					
				Persistently increasing customer expectations											
				Unpopular government decisions impacting on Fire Pension Schemes											
4	Business interruption	Both	Averse	Pandemic (financial pressure on individuals and institutions, and more transactions being made online)	Delays in decisions or their implementation	3	4	16	Building resilience requirements into service contracts	Both	2	3	9		
				Industrial action	Failure to meet performance targets				Digital record keeping	Both					
				Small specialist teams with single person risks	Reputational damage				Storing data back ups off site	Both					
				Significant changes in adviser and consultant personnel	Data quality deterioration				Maintaining close links with advisers, consultants, and external organisations	Both					
				Lack of systems maintenance	Significant restoration costs				Implementation of Cyber Security policy	Both					
				Systems failure					Review and update disaster recovery plan	Both					
				Disaster event - fire, flood, etc					Use of IT systems to work remotely	Both					
				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		
				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				Implementation of Cyber security policy	Both					
				Inadequate staff training and staff vigilance	Costs of fixing issues				Review and update disaster recovery plan	Both					

					Business interruption											
6	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						
				External events impacting on member health and wellbeing - increasing the adverse impact of any problems with pensions	Negative reputational impact				Maintenance of Scheme website and sign posting to the new LGA Fire Pension scheme members website	Both						
				Member benefits paid incorrectly	Breaches resulting in fines from tPR				Staff training	Both						
				Inadequate administration systems and processes					Performance monitoring of employer data quality	Both						
				Poor data provided by employer					Performance monitoring of administration team KPIs	Both						
				Data provided by previous administrator in consistent, with data on 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						
				Inadequate payroll services												
7	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 geo political activity and its impact on the economy and jobs	Reputational risk				Application of division of duties and signatory processes for financial transactions and administration	Both						
				The passing of time since any previous targeted review of Fraud and corruption risk	Time spent unpicking the fraud				Periodic independent internal audit reviews of administration controls and activity	Both						
				Fraud or corruption instigated by any Fund stakeholders	Fraudulent members gain benefits they are not entitled to				Annual external audit reviews	Both						
					Breaches resulting in fines from tPR											
				Lack of capacity to service governance requirements	Adverse impact on service reputation				Training needs analysis and plans for Committees and Board	WCC			Audit of governance arrangements	WCC		
				Lack of training	Breaches of the Law				Training needs analysis and plans for staff	Both			Look at best practice to create training plan	Both		
				Lack of continuity in staffing, advisers, or committee / board members	Exposure to unplanned risks				Quarterly committee and Board meeting cycles	WCC						

8	Governance Failure	Both	Averse	Inadequate checking/review of standards compared to requirements and best practice	Poor Decisions that are not appropriately authorised	3	4	16	Monthly meetings between Scheme Administrator and provider (moving to quarterly after 6 months)	Both	2	3	9		
				Complacency in light of recent governance improvements	customer dissatisfaction				All training provision to be made available to all committee and Board members	WCC					
				Out of date policies and contracts	Incorrect benefit payments to scheme members				Management of a policy schedule	WCC					
				Local government elections impact on committee and Board continuity					Use of digital technology - remote working and remote meetings	Both					
				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					ensure mandatory scheme police documents are reviewed and updated on a regular basis or when regulatory changes are introduced	WCC				the schedule for policy documents needs to be shared with key personnel who are responsible for decision making with an indicator for who is responsible for the review and update of each document	WCC
				Unpopular government decisions impacting on Fire Pension Schemes											
9	Dashboard readiness	Both	Adverse	Poor Data Quality	Poor Data quality leading to low number of matches for members looking for lost pensions . The Fund will need to comply with standards published by the Money and Pensions Service (MaPS) and have regards to their guidance and that of the Pension Regulator. Failure to maintain records accurately may lead to fines being imposed.	3	4	16	Monthly data extract to be provided by WCC payroll sense checking and validation will take place before data can be uploaded to member records for active members, work on data quality issues for deferred members to be identified and work plan created to correct data	Both	2	3	9	West Yorkshire and WCC payroll to work together to ensure monthly extracts are accurate and sent by 19th of following month to ensure records are kept up to date for active members	both



10	2nd modified exercise	both	Adverse	resource and data required to deliver the project	retained officers not provided with the information required within timescales set in regulations. A review of calculations completed for the first exercise will also need to be undertaken as there was a query over pay used for these.	3	4	16	project team within WCC to be established, this will include payroll/HR/pensions admin staff. In scope members have been identified and contacted. Communication sent to all retained staff to spread the word for any retained staff that may have left the service and contact has been lost.	WCC	3	3	12	calculators and pay information will be supplied by Home Office to assist with calculation of service that can be purchased by retained staff.	WCC
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## Warwickshire Fire and Rescue Local Pension Board of the Firefighters' Pension Scheme

25 September 2023

### Forward Plan

#### Recommendation

That the Warwickshire Fire and Rescue Local Pension Board for Firefighters' Pension Scheme notes and comments on the forward plan.

#### 1. Executive Summary

- 1.1 The forward plan is attached at appendix 1. This provides a plan for items to be reviewed and discussed and sets out training to be undertaken by the Board.

#### 2. Financial Implications

None

#### 3. Environmental Implications

None

#### 4. Supporting Information

- 4.1 The forward plan has been updated to include items for future meetings.
- 4.2 New Member training is being arranged and should be held in either October or November.
- 4.3 A date for training on the second modified exercise is yet to be set but is expected to be held some time in November/December. The second modified exercise will commence from 1 October 2023 when the draft Firefighters' Pension Scheme 2006 (England) (Amendment) Order 2023 is laid before Parliament for certain retained officers to be eligible for pension scheme membership.

## Appendices

1. Appendix 1 – Forward Plan

## Background Papers

None

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

Local Member(s):

Other members: Cllrs Dahmash and Gifford

## Forward Plan items Warwickshire Fire Local Pension Board

Q2 25th September 2023	Q3 6th November 2023	Q4 12th February 2024	Q1 TBC
Monthly admin report from West Yorkshire	Monthly admin report from West Yorkshire	Monthly admin report from West Yorkshire	Monthly admin report from West Yorkshire
Governance and Regulatory update	Governance and Regulatory update	Governance and Regulatory update	Governance and Regulatory update
Risk monitoring	Risk monitoring	Risk monitoring	Risk monitoring
		Chairs Report	
Forward Plan	Forward Plan	Forward Plan	Forward Plan
<b>Policies</b>	<b>Policies</b>	<b>Policies</b>	<b>Policies</b>
		Discretions Policy Terms of Reference Conflict of Interest	
<b>Training</b>	<b>Training</b>	<b>Training</b>	<b>Training</b>
<del>New member training/2nd Modified exercise</del>	New member training 2 <sup>nd</sup> modified exercise		

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