



Monthly Report

June 2022

Warwickshire Fire Authority



West Yorkshire Pension Fund

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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 57 - May 2022 \(fpsregs.org\)](https://www.fpsregs.org/)

FPS

Matthews – Second options exercise

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

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

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

Ill health “underpin”

At a recent coffee morning an FRA raised a question as to how the ill health underpin should be applied to a case. The policy intent is to ensure that a protected member who applies for IHR before 31 March 2022, where the application is determined in their favour after that date, is treated no less favourably than if the application had been determined on that date.

To avoid any such members being placed in a worse position, changes have been made to the reformed scheme rules. Regulations 65(2A) and (2B) have been inserted into the FPS 2015 regulations with effect from 1 April 2022. This means that for members where the ill-health assessment process began on or before 31 March 2022, the member is assessed for ill-health retirement against an NPA of 55. This will mean that there should be no cases where an affected member would have qualified for ill-health retirement under the legacy 1992 scheme but does not qualify under the reformed scheme.

The members benefit entitlement should be calculated in the same manner as set out in the FPS 2015 regulations.

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

Abatement guidance

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

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

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

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

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

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

Annual Benefit Statements 2022

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

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

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

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

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

FRA pension contacts

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

Please send this information ASAP by email to bluelightpensions@local.gov.uk .

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

FPS England SAB updates

TPR factsheet

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

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

The six processes are:

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

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

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

SAB remedy engagement sessions

The Scheme Advisory Board (SAB) has been invited by the Home Office to take part in a series of joint engagement sessions with the Police SAB to consider scheme specific versions of the Provision Definition Documents (PDDs) which define the provisions of the [Public Service Pensions and Judicial Offices Act \(PSPJOA\) 2022](#) for each area of the 2015 Remedy.

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

Other News and Updates

DLUHC publishes statutory guidance on special severance payments

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

The guidance confirms that:

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

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

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

HMRC

HMRC publishes Pension Schemes Newsletter 139

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

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

Events

FPS coffee mornings

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

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

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

[3 May 2022 – Contingent decisions](#)

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

[31 May 2022 – ABS and RSS](#)

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

Payroll workshop

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

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

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

Legislation

Useful links

- [The Firefighters' Pensions \(England\) Scheme Advisory Board](#)
- [FPS Regulations and Guidance](#)
- [FPS Member](#)
- [Khub Firefighters Pensions Discussion Forum](#)
- [FPS1992 guidance and commentary](#)
- [The Pensions Regulator Public Service Schemes](#)
- [The Pensions Ombudsman](#)
- [HMRC Pensions Tax Manual](#)
- [LGA pensions website](#)
- [LGPS Regulations and Guidance](#)
- [LGPC Bulletins](#)

2. Member Update

None

3. Administration Update

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

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

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

4. Communication & Training

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

FRA training delivered by WYPF:

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

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

Annual Benefit Statements (ABS)

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

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

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

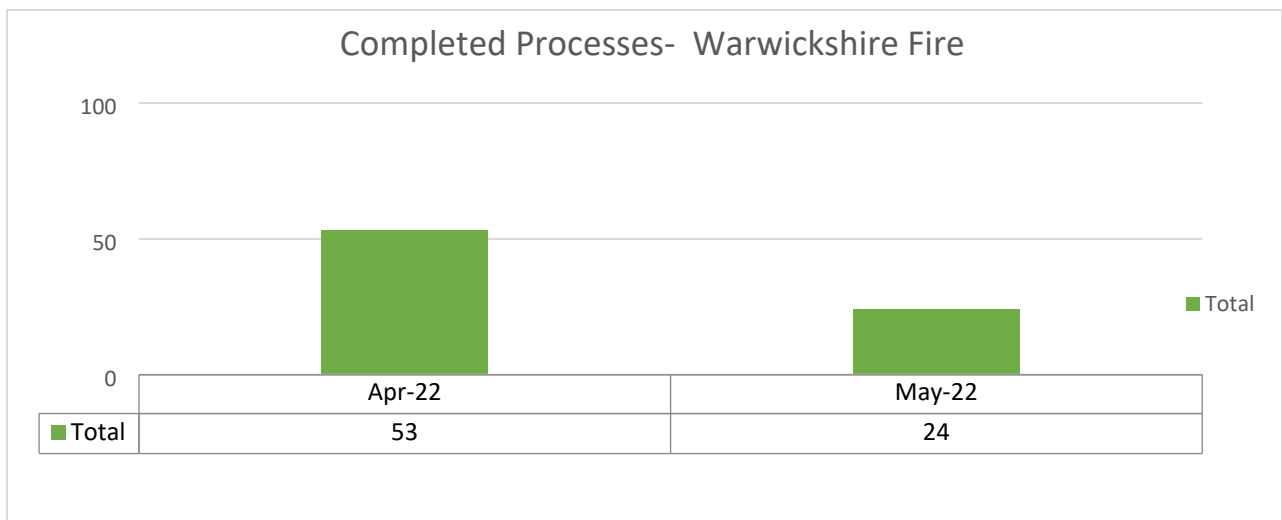
For information about Remedy and Immediate detriment, WYPF will continue to provide information as agreed with FRAs

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

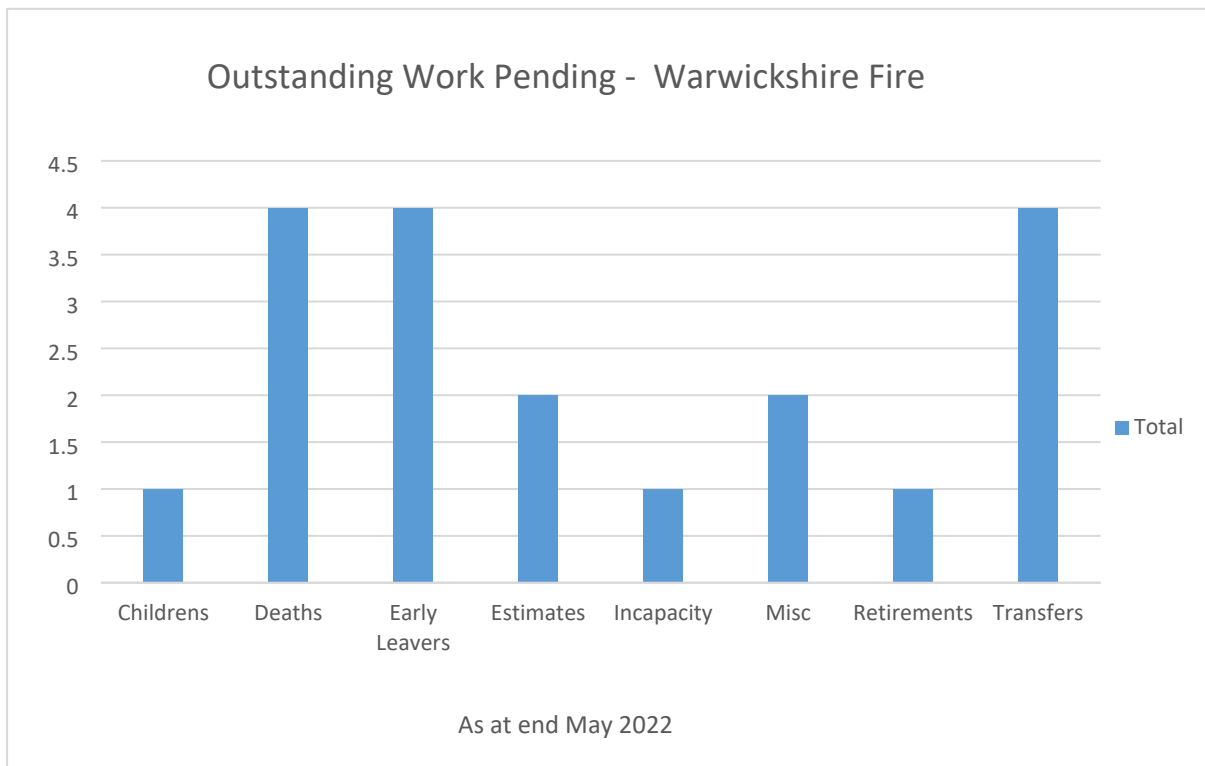
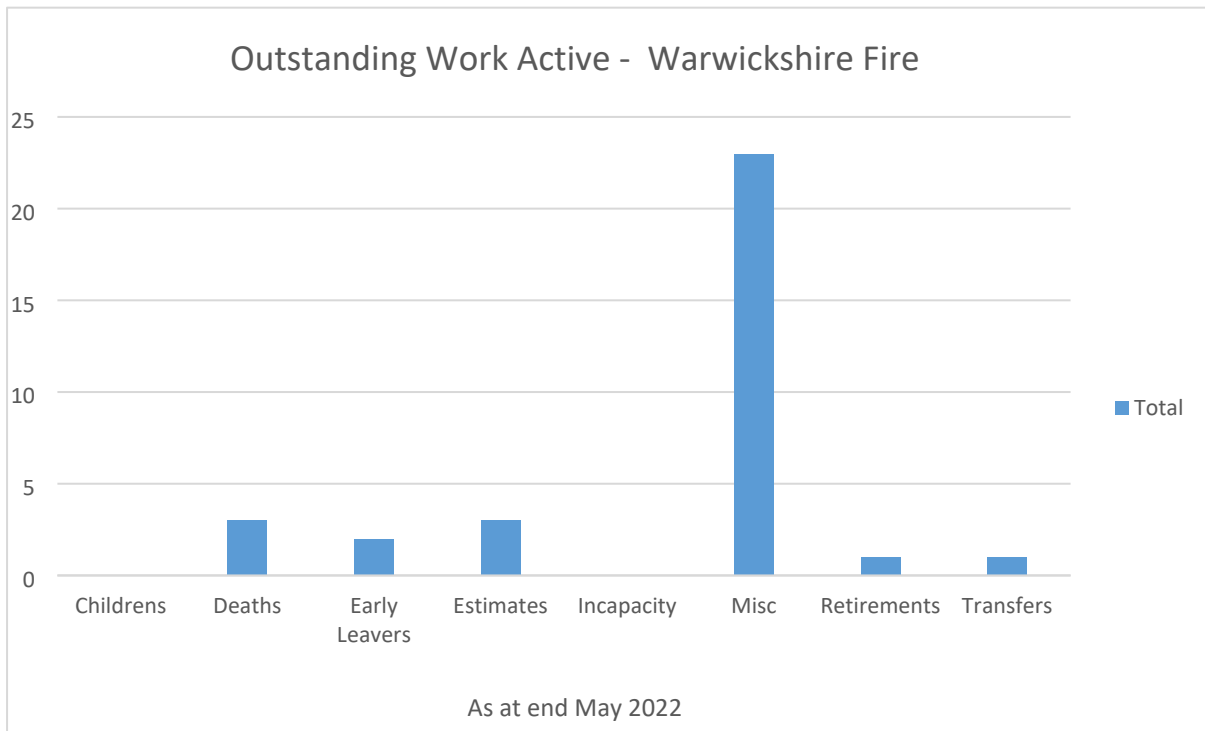
5.Key Performance Indicators

Completed processes

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



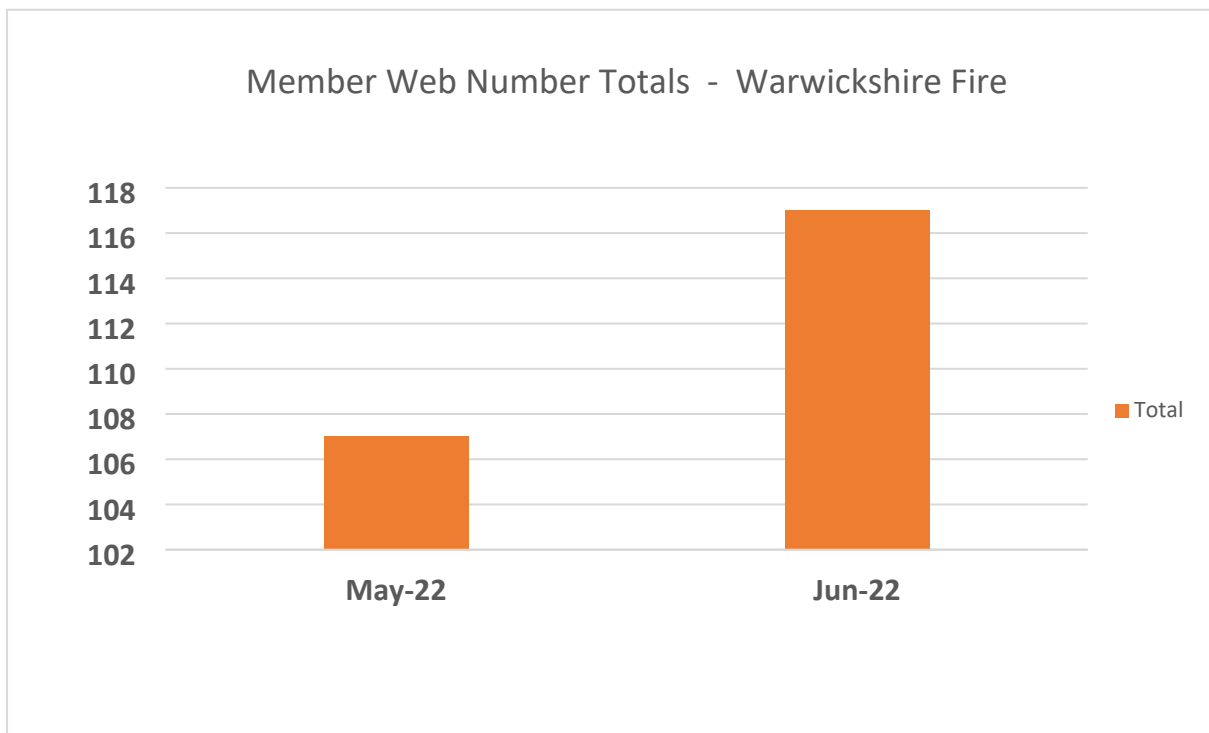
6. Work in Progress



7.Member Web Registrations

The number of members signed up to member web are:

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

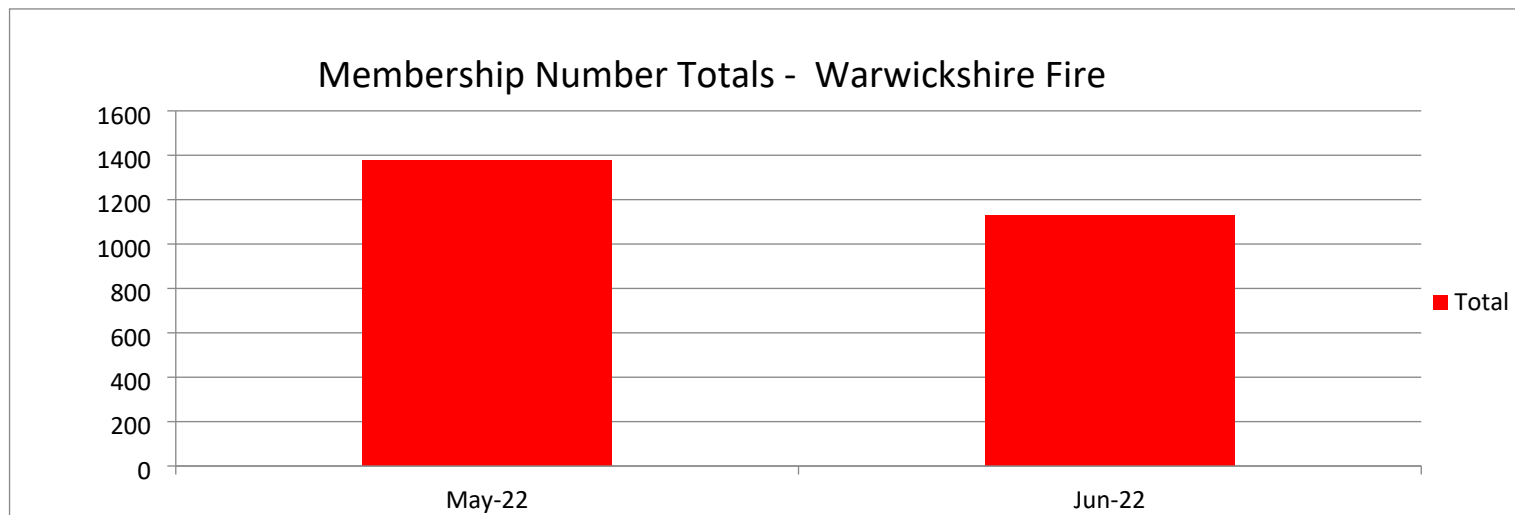


8. Calendar of Events

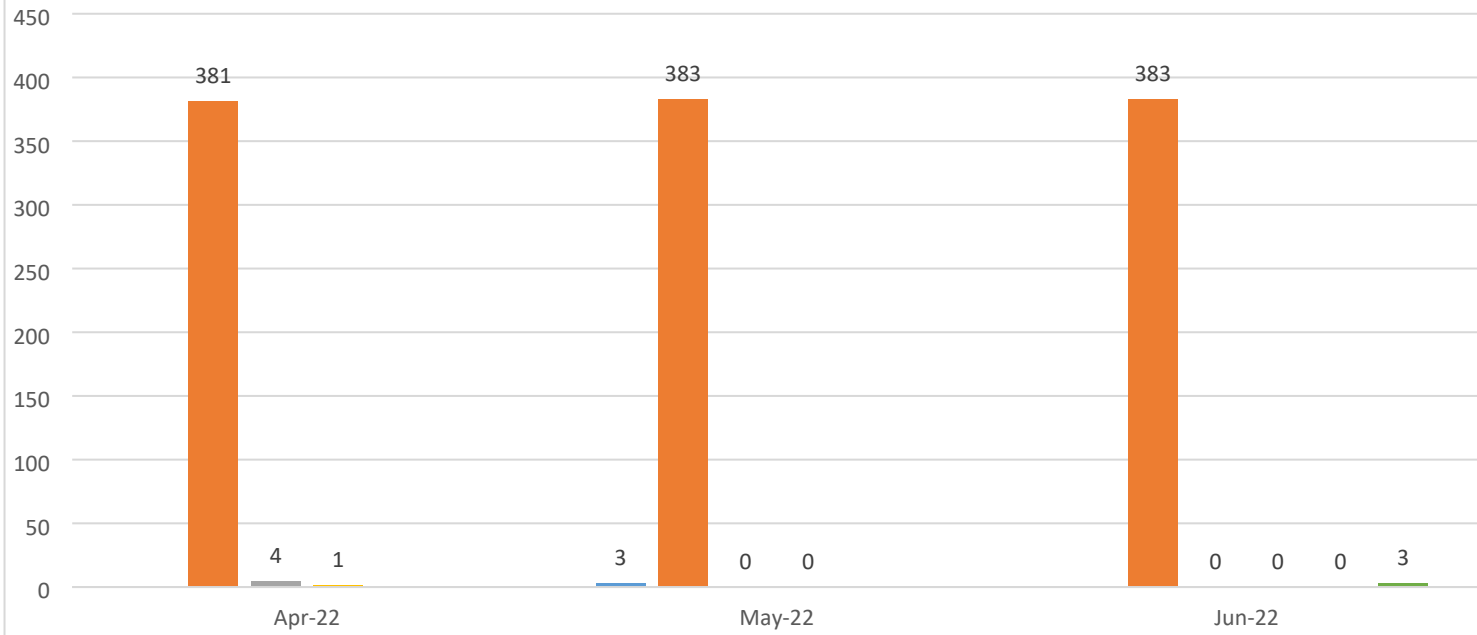
| January | February | March | April |
|---|---|---|---|
| Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC | Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet | Life Certificates | Apply Pensions Increase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

9.Membership Numbers

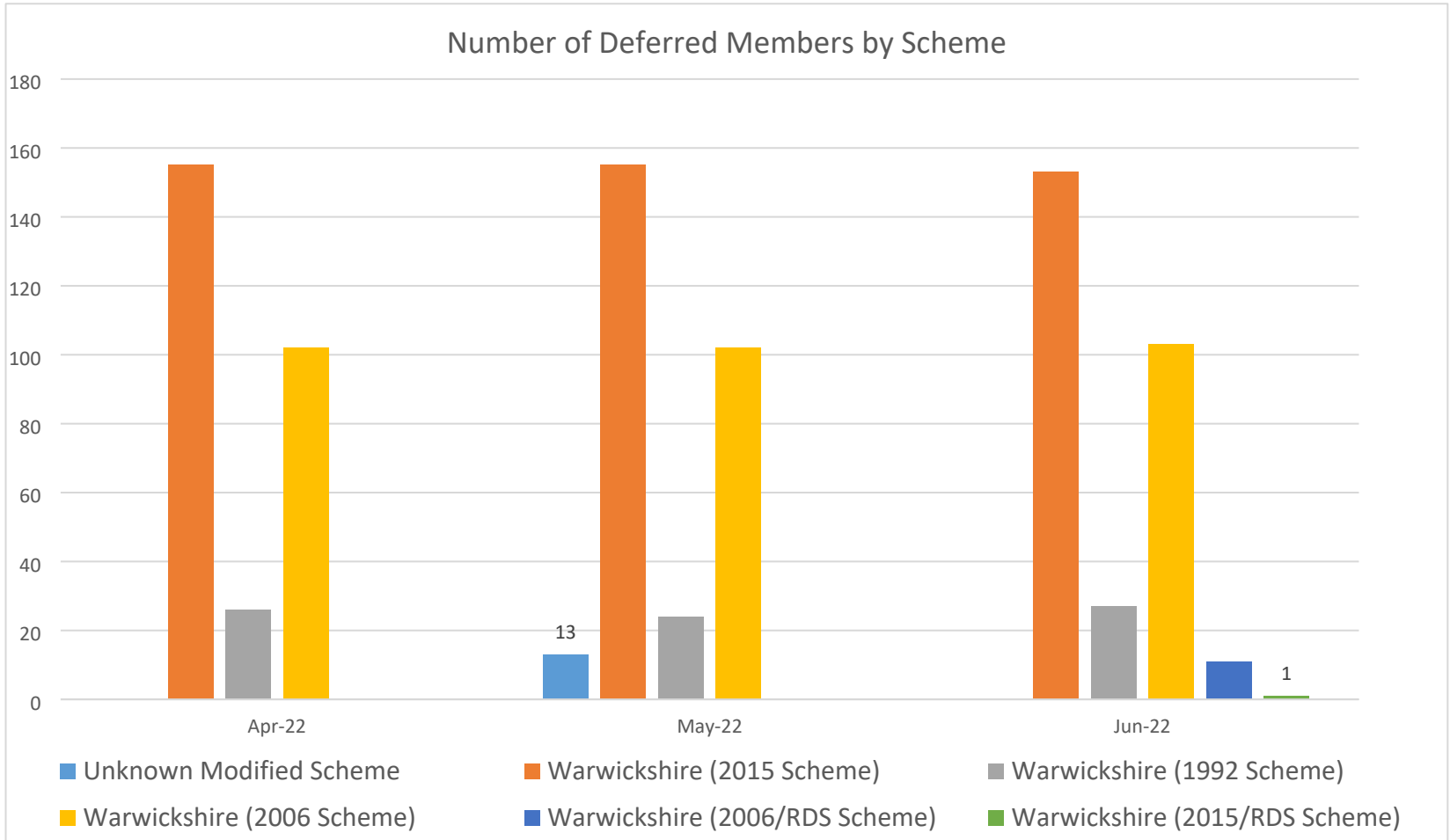
| Scheme Name | Active Members | Deferred Members | Pensioners | Beneficiaries | Preserved Refund | Leavers Options Pending |
|--------------------------------|----------------|------------------|------------|---------------|------------------|-------------------------|
| Warwickshire (1992 Scheme) |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



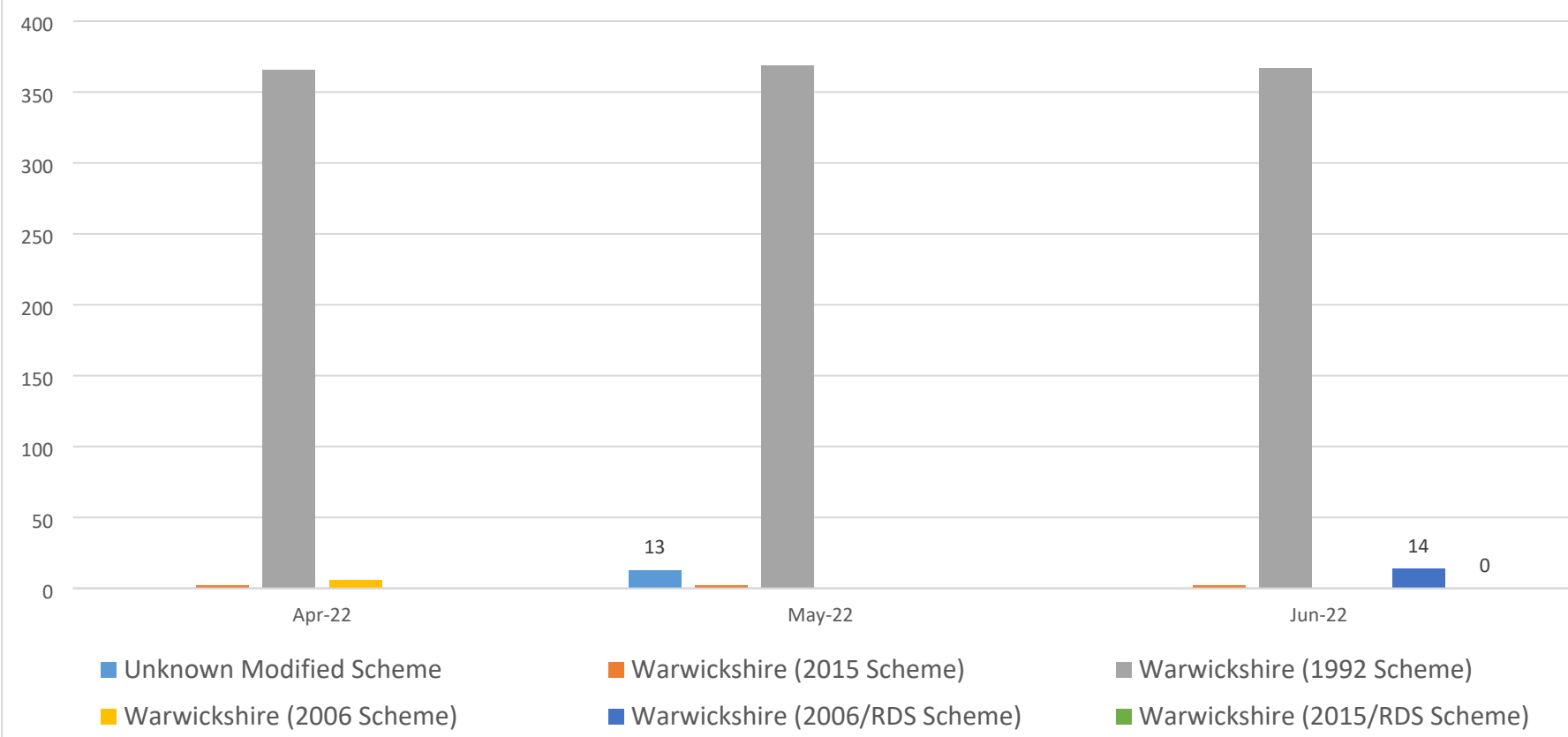
Number of Active Members by Scheme



- Unknown Modified Scheme
- Warwickshire (2015 Scheme)
- Warwickshire (1992 Scheme)
- Warwickshire (2006 Scheme)
- Warwickshire (2006/RDS Scheme)
- Warwickshire (2015/RDS Scheme)



Number of Pensioners by Scheme



10. Five Year Audit Plan 2019 – 2024

| West Yorkshire Pension Fund Five Year Audit Plan 2019 - 2024 | Frequency | Last Audit | Recommendations | Days | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 | Total |
|--|-----------|------------|-----------------|------|----------|----------|----------|----------|----------|-----------|
| Annual Accounts Verification | Annual | Jul 18 | 1 | 10 | ✓ | ✓ | ✓ | ✓ | ✓ | |
| 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 |

11. 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 |