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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 58 - June 2022 (fpsregs.org)

FPS

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

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

The formal commissioning letter at <u>Appendix 1</u> sets out the centrally prescribed assumptions that must be applied when calculating pension income and expenditure forecasts. The forms can be accessed on DELTA from 1 July 2022.

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

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

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

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

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

Matthews - Lessons Learned

The Home Office has recently shared with us a <u>draft document which outlines the lessons learned</u> from the first special members' options exercise.

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

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

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

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

Immediate Detriment Framework costing and assumption guidance

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

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

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

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

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

Bluelight inbox and query form

Now that the Bluelight team is up to full strength please can we ask that all queries are sent to the generic Bluelight inbox (<u>bluelightpensions@local.gov.uk</u>). This will

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

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

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

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

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

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

Annual Benefit Statements 2022 - Information factsheet

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

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

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

FPS England SAB updates

SAB respond to HM Treasury's letter

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

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

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

Other News and Updates

Further consultation on Pensions Dashboards launched

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

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

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

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

Events

FPS coffee mornings

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

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

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

14 June 2022 – TPR Governance and Administration survey results 2020-21

28 June 2022 – Matthews - lessons learned

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

Legislation

Useful links

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

2. Member Update

None

3. Administration Update

Preparing for year-end

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

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

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

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

Annual benefit statements (ABS)

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

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

4. Communication & Training

Communications

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

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

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

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

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

Pre-retirement seminars attended by WYPF during June:

7 June – WY FRA

13 June – Fire Comms Group

14 June - Staffs FRA

Pension boards

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

22 June - Devon & Somerset Pension Board

National meetings

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

FRA training delivered by WYPF: None

5. IT Update

KPI Reporting

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

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

BREAKING News

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

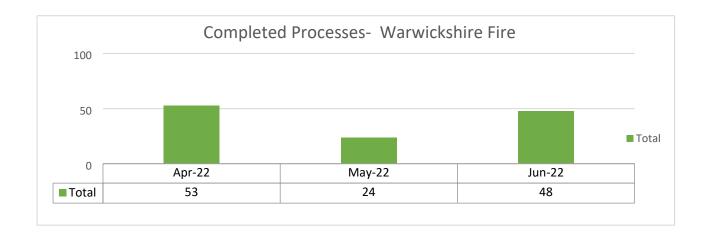
The two unions filed separate challenges to the government's proposals, but their claims will be heard together because they overlap.

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

6.Key Performance Indicators

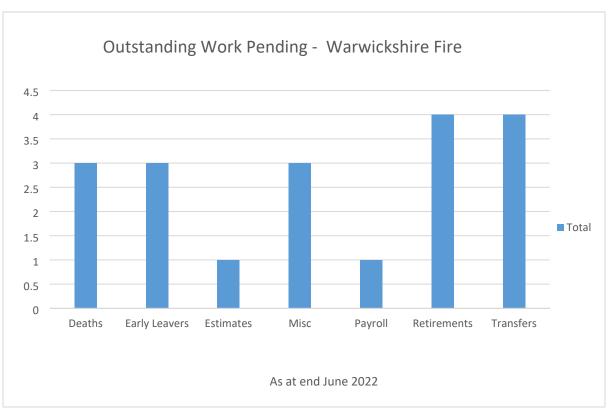
Completed processes

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



7. Work in Progress





8. Member Web Registrations

The number of members signed up to member web are:

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

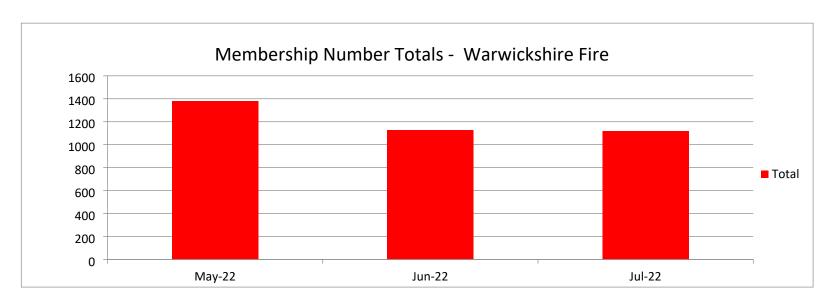


9. Calendar of Events

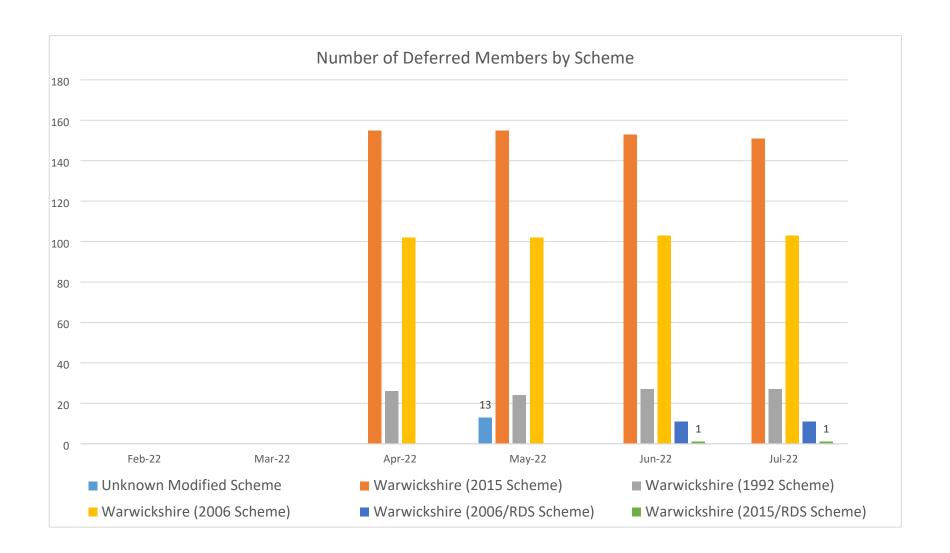
January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's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

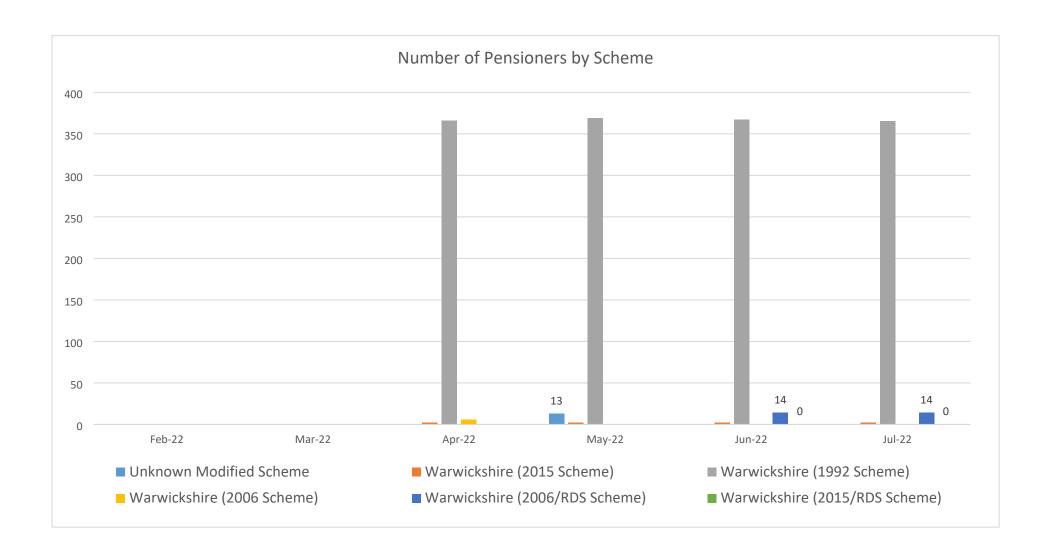
10.Membership Numbers

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









11.Five Year Audit Plan 2019 – 2024

West Yorkshire Pension Fund Five Year Audit Plan 2019 - 2024	Frequency	Last Audit	Recommendations	Days	19/20	20/21	21/22	22/23	23/24	Total
Annual Accounts Verification	Annual	Jul 18	1	10	√	✓	√	✓	✓	
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	5 Yearly	Mar 17	0	20			√			
Widow and Dependent Benefits	5 V	0-1-10		00					✓	
- III Health Pensions	5 Yearly	Oct 13	1	20		✓			V	
- Flexible Retirements	5 Yearly	Apr 16	<u> </u>	20		V		✓		
- Deferred Pensions	5 Yearly	Mar 18	0	20				V		
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