



Monthly Report

September 2022

Warwickshire Fire Authority



West Yorkshire Pension Fund

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Contents

1 Regulations/Fire Scheme Update	4
2 Member Update	7
3 Administration Update	7
4 Communication & Training	10
5 IT Update	11
6 Key performance Indicators	12
7 Work in progress	13
8 Member web registrations	14
9 Calendar of Events.....	15
10 Membership Numbers.....	16
11 Five Year Audit Plan.....	20
12 Overriding Disclosure Time Limits	21

1.0 Regulations/Fire Scheme Update

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

[FPS bulletin 60](#)

FPS

Age discrimination eligibility – Factsheet

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

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

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

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

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

Abatement guidance updated

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

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

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

FPS England SAB updates

SAB remedy engagement sessions

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

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

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

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

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

Other News and Updates

Draft LGA response to PDP consultation and call for input

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

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

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

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

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

Pension awareness campaigns

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

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

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

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

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

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

AGM – 25 and 26 October

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

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

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

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

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

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

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

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

We look forward to welcoming you to the event!

Legislation

Useful links

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

2. Member Update

None

3. Administration Update

Administrator remedy self-assessment survey

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

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

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

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

WYPF follow these measures, with risk assessment monitored.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Annual benefit statements (ABS) and Pension Savings Statements:

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

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

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

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

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

Action: please respond to emails requesting pay information immediately.

Ill-health and Injury pensions:

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

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

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

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

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

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

Data breaches: None this month

4. Communication & Training

Communications

Pre-retirement seminars attended by WYPF during June: None

Dorset & Wiltshire – 25 August

East Sussex - 17th August

Pension boards attended

Cambridgeshire – 24 August

Dorset & Wilshire - 25 August

Leicester - 1 September

Devon & Somerset – 7 September

Royal Berkshire – 7 September

Pension boards upcoming

Nottingham – 23 September

North Yorkshire – 29 September

National meetings

Attended

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

Upcoming

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

FRA training delivered by WYPF:

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

5. IT Update

KPI Reporting

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

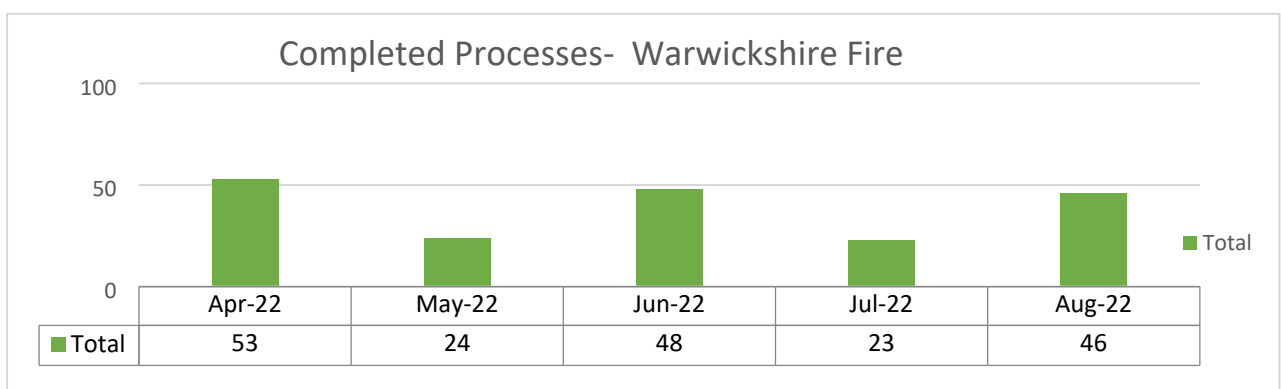
Through our analysis we have found some issues with a small number of measures and we are liaising with IT to rectify the coding.

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

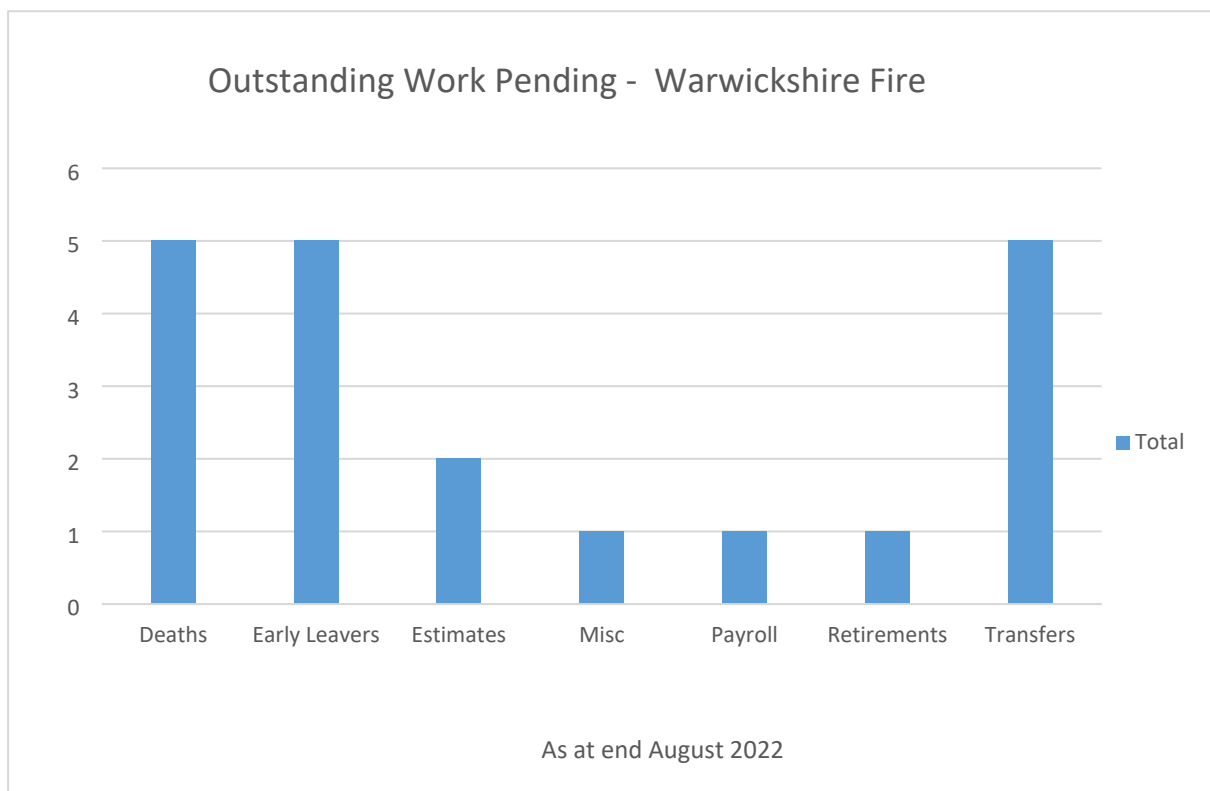
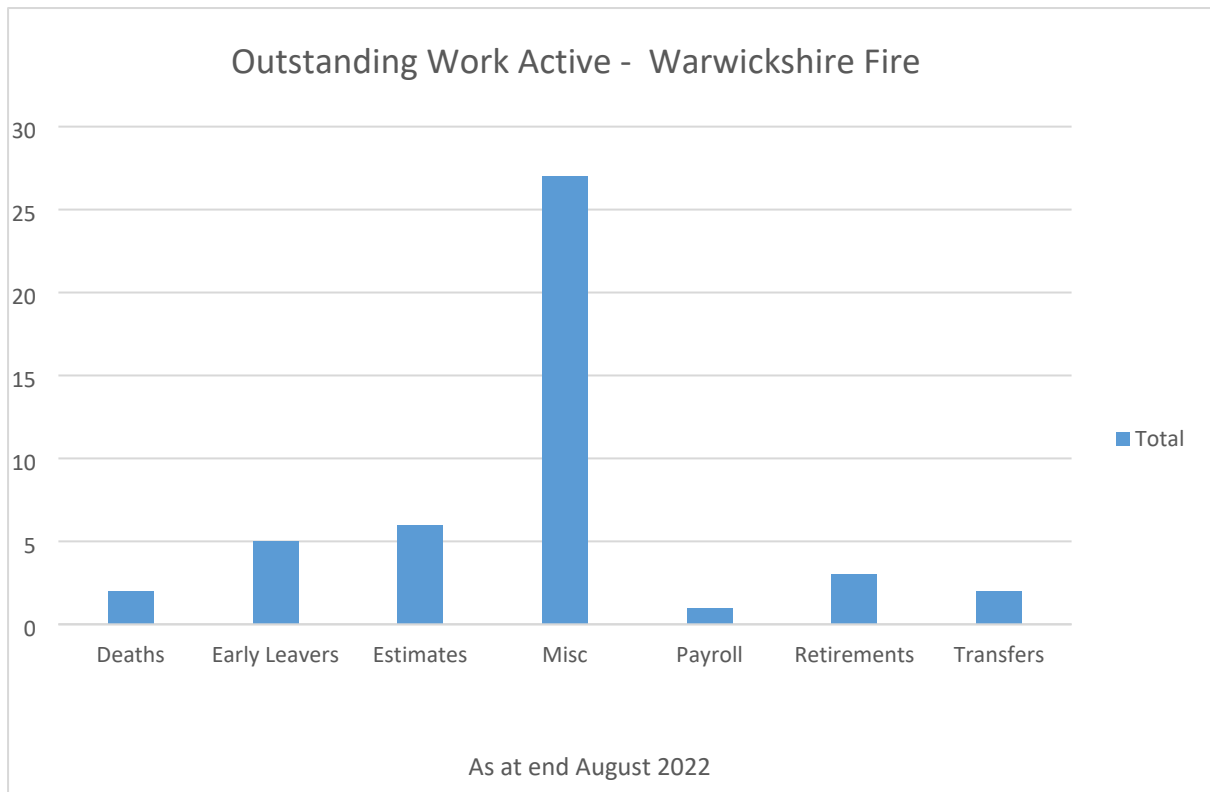
6.Key Performance Indicators

Completed processes

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



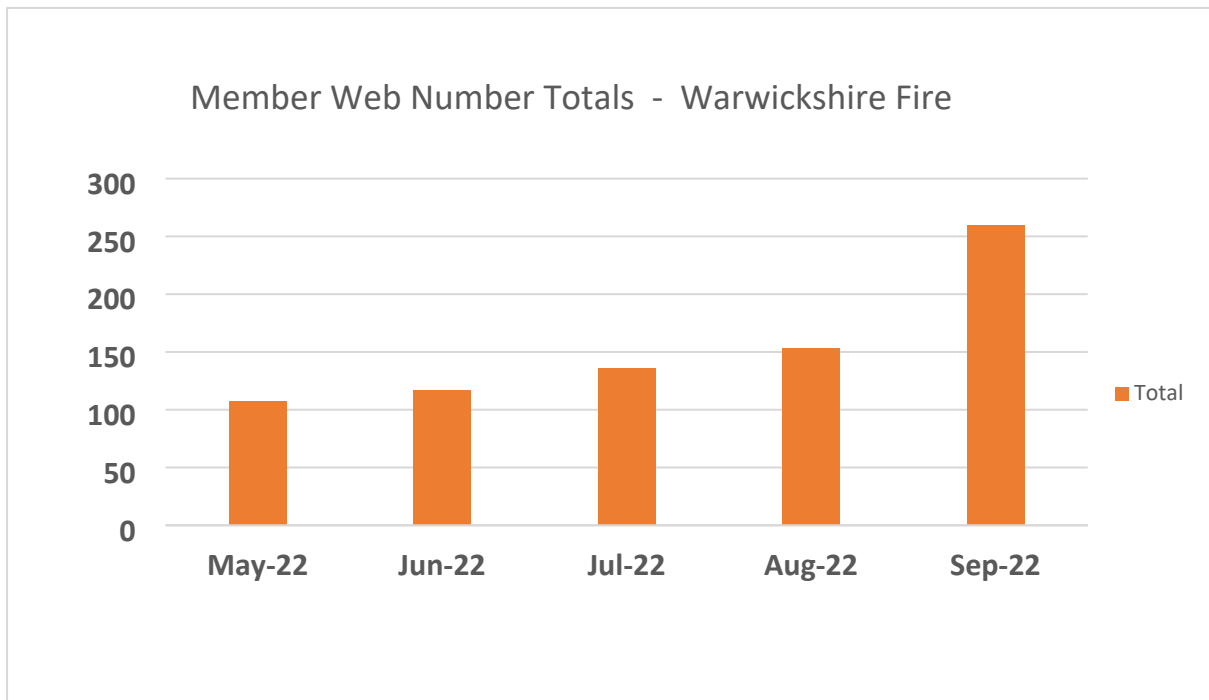
7. Work in Progress



8.Member Web Registrations

The number of members signed up to member web are:

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

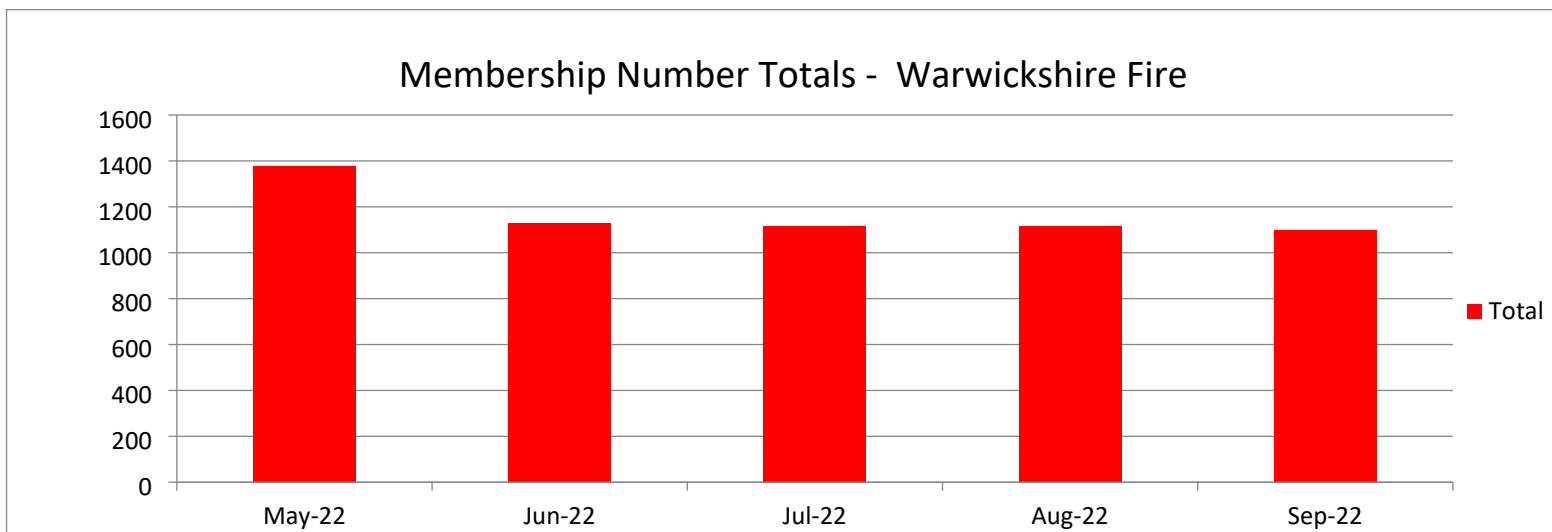


9. Calendar of Events

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

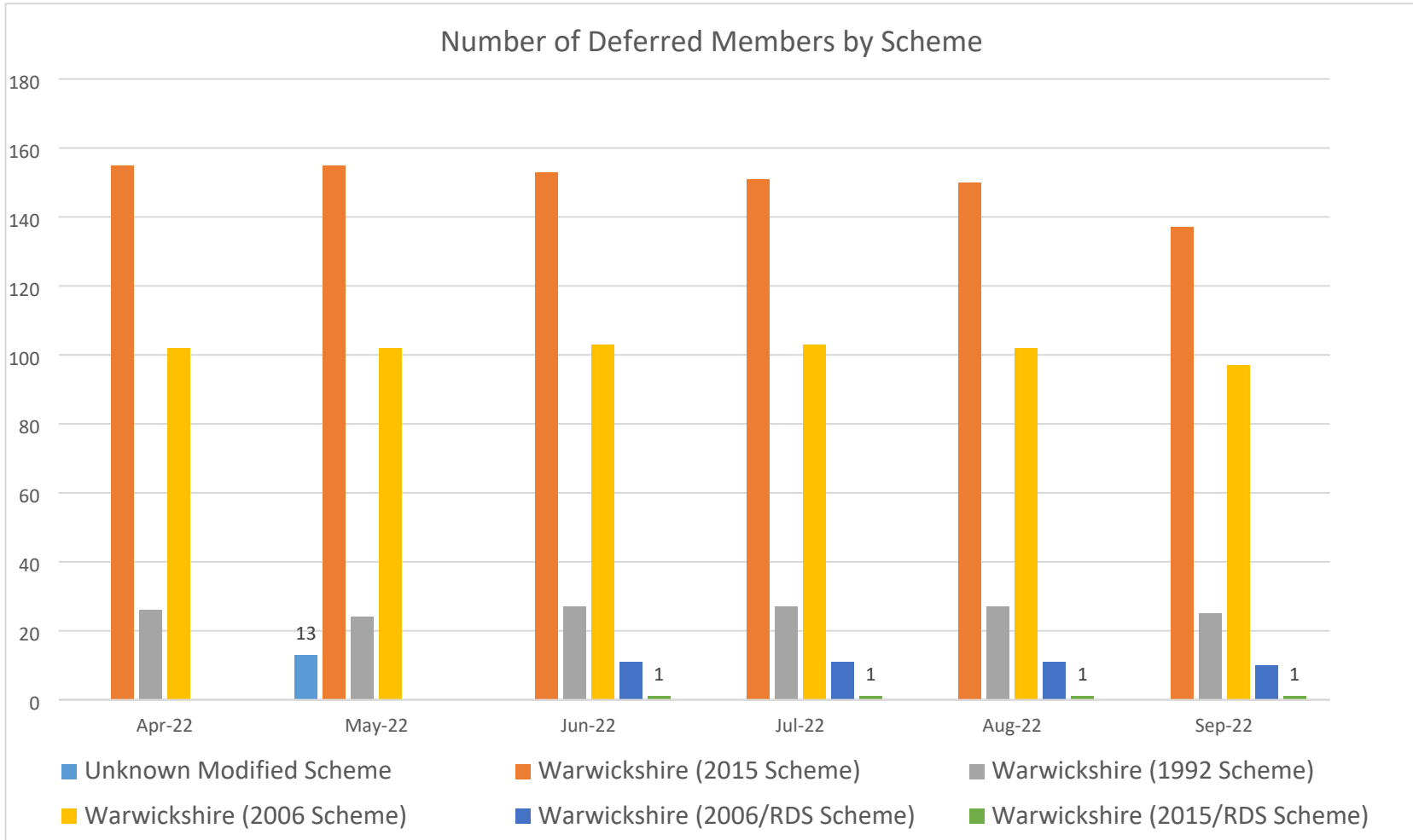
10.Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Warwickshire (1992 Scheme)	0	25	360	58	0	0
Warwickshire (2006 Scheme)	1	97	2	1	2	0
Warwickshire (2006/RDS Scheme)	1	10	15	0	0	0
Warwickshire (2015 Scheme)	369	137	6	0	3	8
Warwickshire (2015/RDS Scheme)	3	1	0	0	0	0

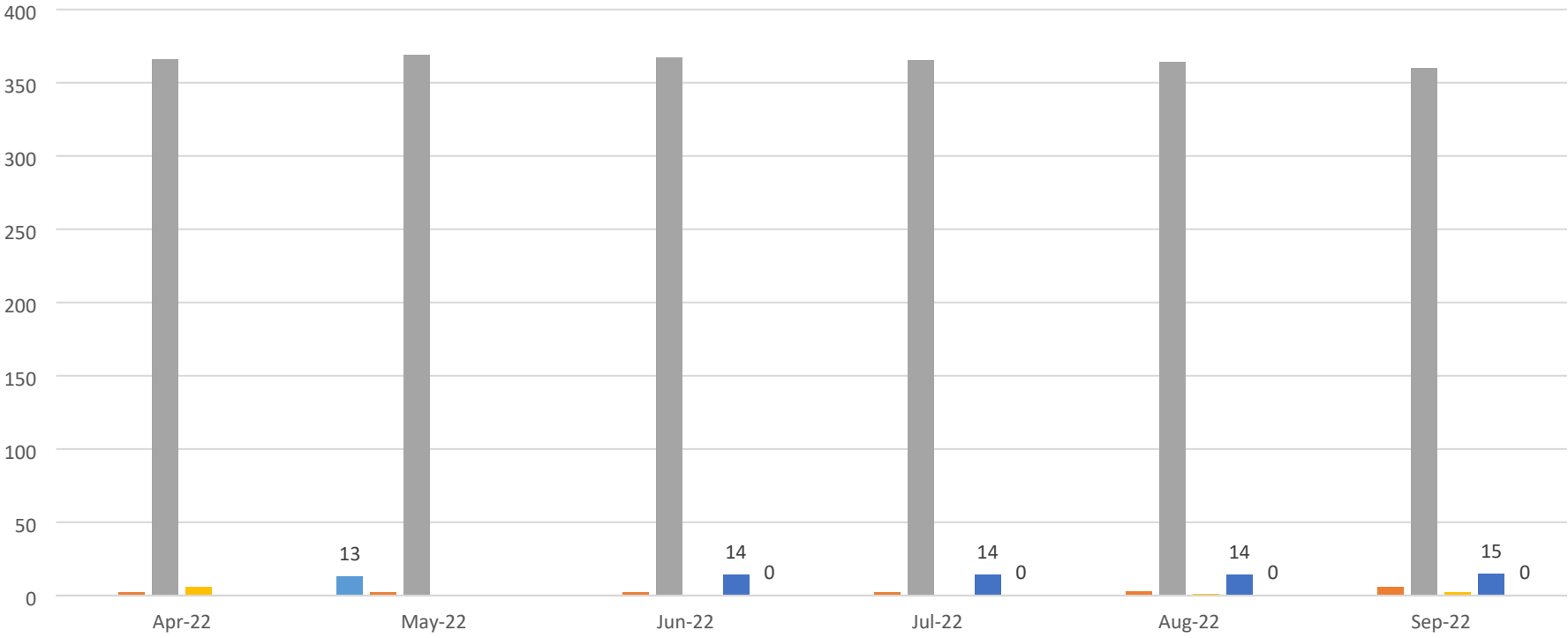


Number of Active Members by Scheme





Number of Pensioners by Scheme



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

11.Five Year Audit Plan 2019 – 2024

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

12. Overriding Disclosure Time Limits

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

Divorce Time limits

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