



Monthly Report

October 2022

Warwickshire Fire Authority



West Yorkshire Pension Fund

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1.Regulations/Fire Scheme Update

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

[FPS bulletin 61](#)

FPS

Immediate Detriment Framework guidance updated

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

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

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

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

Potential industrial action

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

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

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

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

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

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

Member communications following eligibility factsheet

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

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

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

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

FPS England SAB updates

SAB levy 2022-23

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

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

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

SAB collaboration sessions on the Matthews remedy

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

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

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

Other News and Updates

Pensions awareness campaign postponed

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

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

Public sector exit payments

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

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

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

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

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

AGM – 25 and 26 October

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

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

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

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

- Firefighter compensation scheme
- Discretions
- Pensionable pay

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

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

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

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

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

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

We look forward to welcoming you to the event!

Legislation

Useful links

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

2.Member Update

None

3.Administration Update

Clarification of abatement process for multiple pensions & re-employments

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

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

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

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

McCloud & Sargent

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

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

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

Data breaches: None this month

4.Communication & Training

Communications

Pre-retirement seminars attended by WYPF during June:

Dorset & Wiltshire – 7th

Pension boards attended

Leicestershire – 1st

Derbyshire – 6th

Devon & Somerset – 7th – attended by Matt

Royal Berkshire – 7th

Lincolnshire – 12th – attended by Matt

Buckinghamshire – 21st

Northamptonshire – 29th

Pension boards upcoming

Nottingham – 23 September

North Yorkshire – 29 September

National meetings Attended

FPF Communications Working Group – 16 September

Fire Scheme Advisory Board – 8th

LGA Matthews Working Group – 9th and 22

LGA/NPCC – Prioritisation of cases post October 2023

Home Office Working Group – Annual Allowance - 20th

SAB/HO Remedy Collaboration – 23rd

X-Whitehall Project Management Group – 29th

SAB/HO Matthews Engagement – 29th

LGA/NPCC – Remediable Service Statements & Data Gathering

Upcoming

FPS Technical Group - 25 October 2022

FPS AGM - 25 October & 26 October 2022

SAB - 8 December 2022

FRA training delivered by WYPF: None

5.IT Update

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

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

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

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

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

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

Our new technology stack is as follows:

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

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

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

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

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

Dashboards

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

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

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

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

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

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

6.KPI Reporting

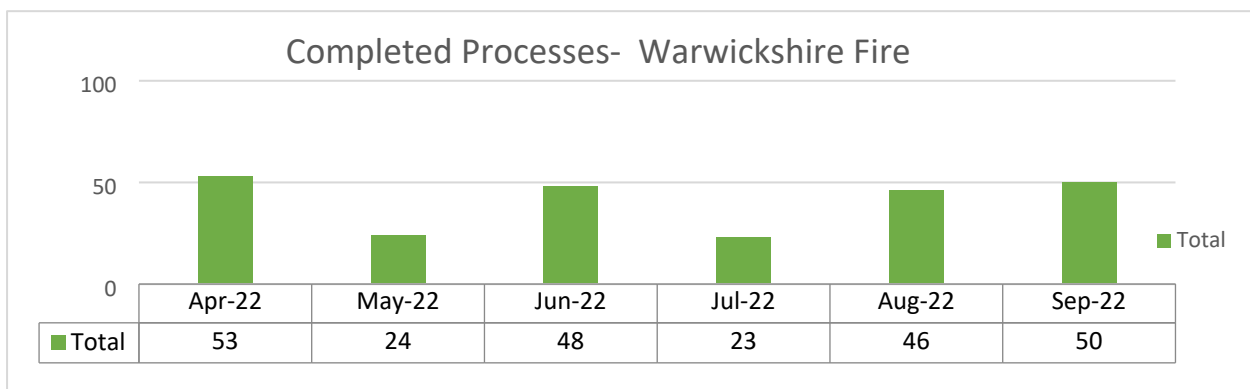
The review is still on track for a late autumn release.

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

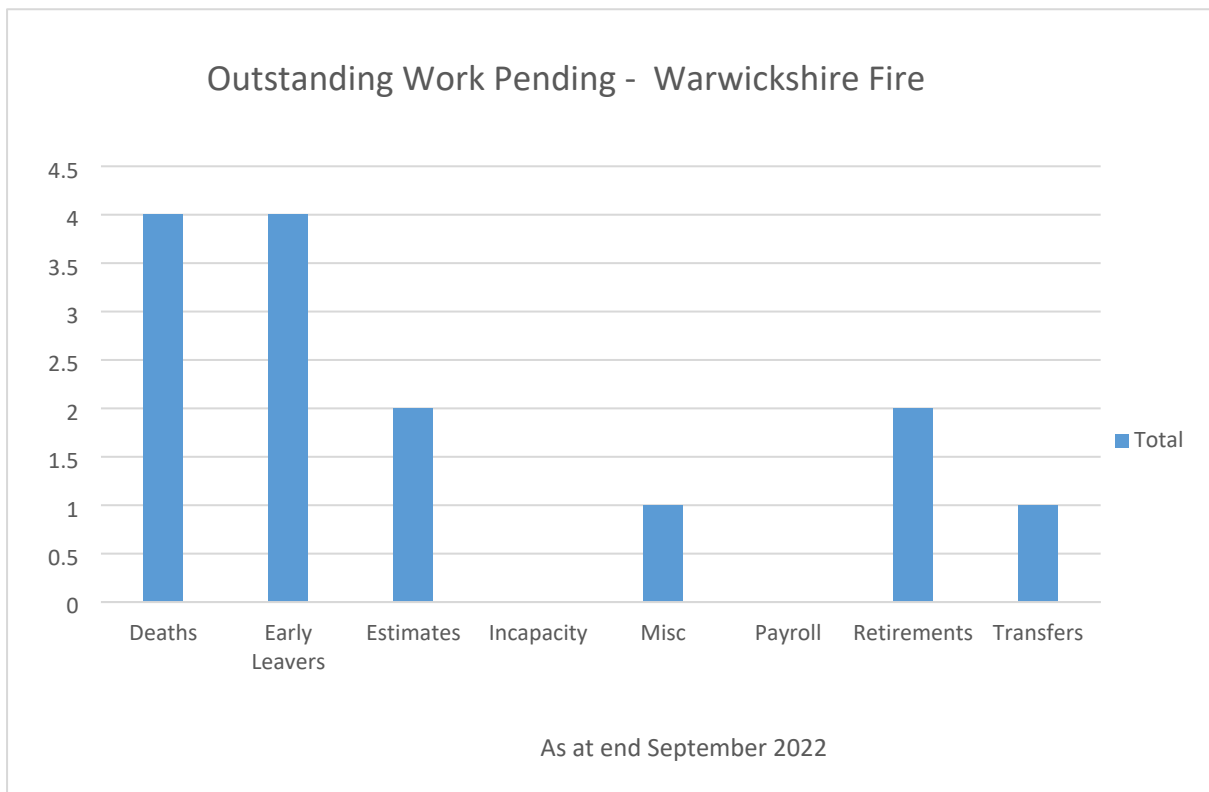
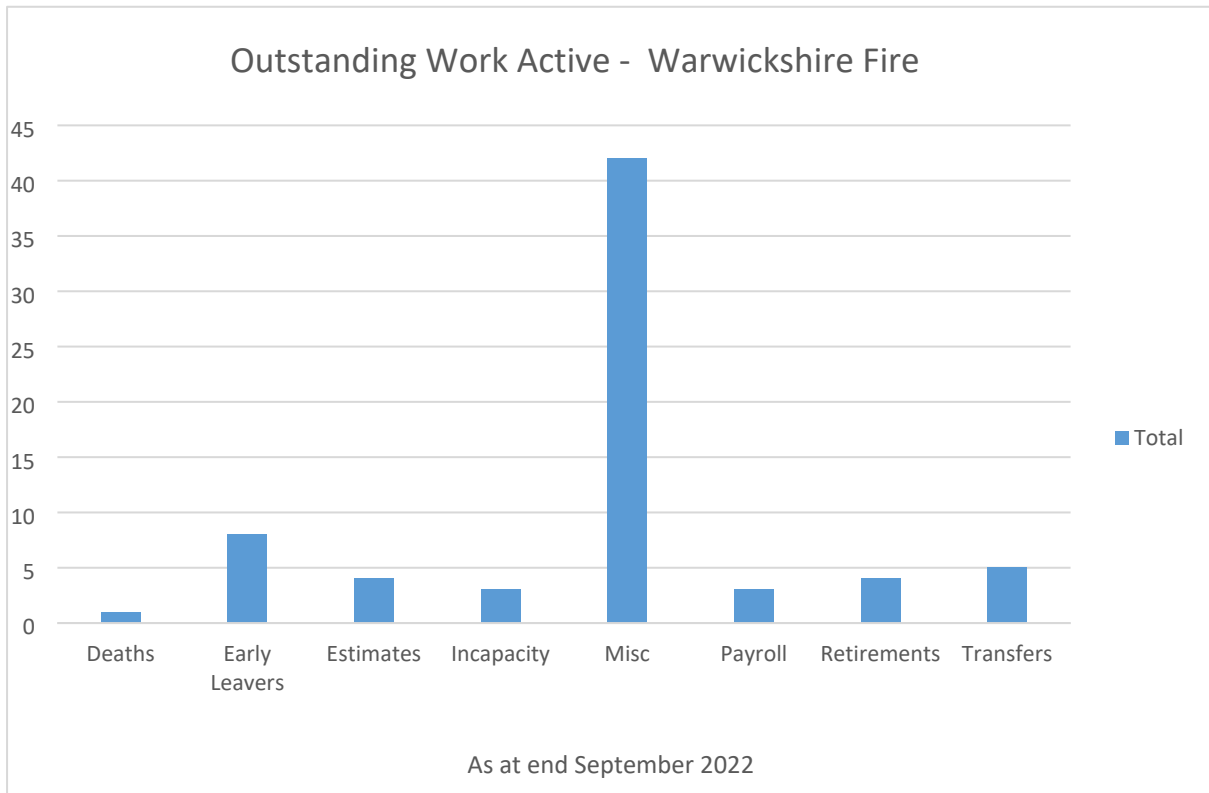
7.Key Performance Indicators

Completed processes

Warwickshire Fire (1 to 30 September 2022)						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Transfer In Quote	1	10	1	85	100	7
Transfer In Actual	1	10	1	85	100	2
Pension Estimate	13	10	11	85	84.62	11.23
Deferred Benefits Into Payment/Payment of Lump Sum	2	3	2	85	100	2
Set Up New Spouse Pension	1	5	1	85	100	1
Change of Address	9	20	9	85	100	2.89
Change of Bank Details	2	20	2	85	100	1
General Payroll Changes	3	20	3	85	100	1
Age 55 Increase to Pension	1	20	1	85	100	16
Life Certificate received	2	5	2	85	100	1
Death Grant Nomination Form Received	2	20	2	85	100	5
Spouse Potential	1	20	1	85	100	2
Initial letter Death in Retirement	2	10	2	85	100	1
Death in Retirement	2	5	2	85	100	1
Update Member Details	6	20	6	100	100	1
Injury Review	1	20	1	100	100	1
Payment of Spouses _Child Benefits	1	10	1	100	100	1
Monthly Pension	443	Pay date	443	100	100	



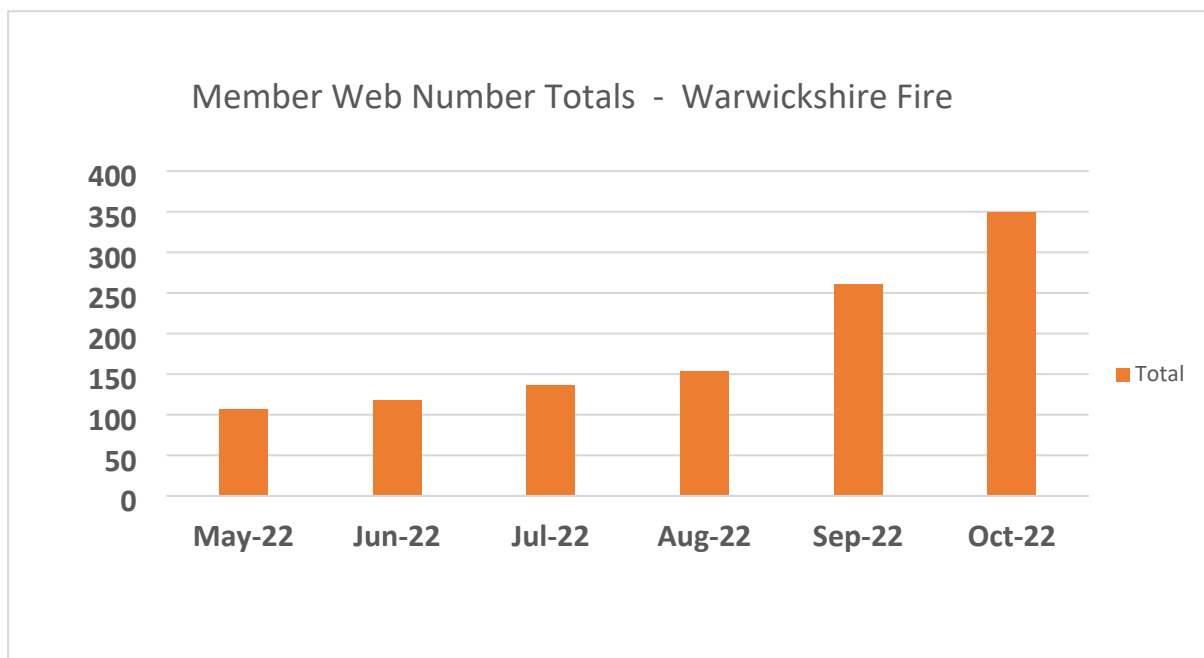
8. Work in Progress



9.Member Web Registrations

The number of members signed up to member web are:

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

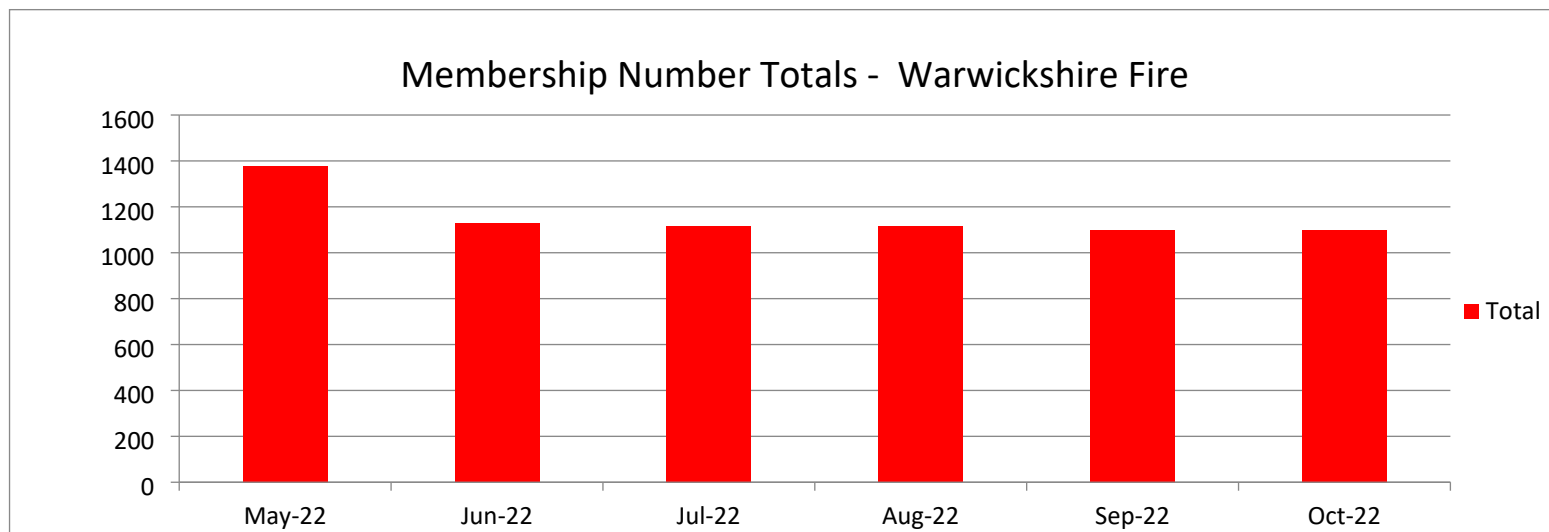


10. Calendar of Events

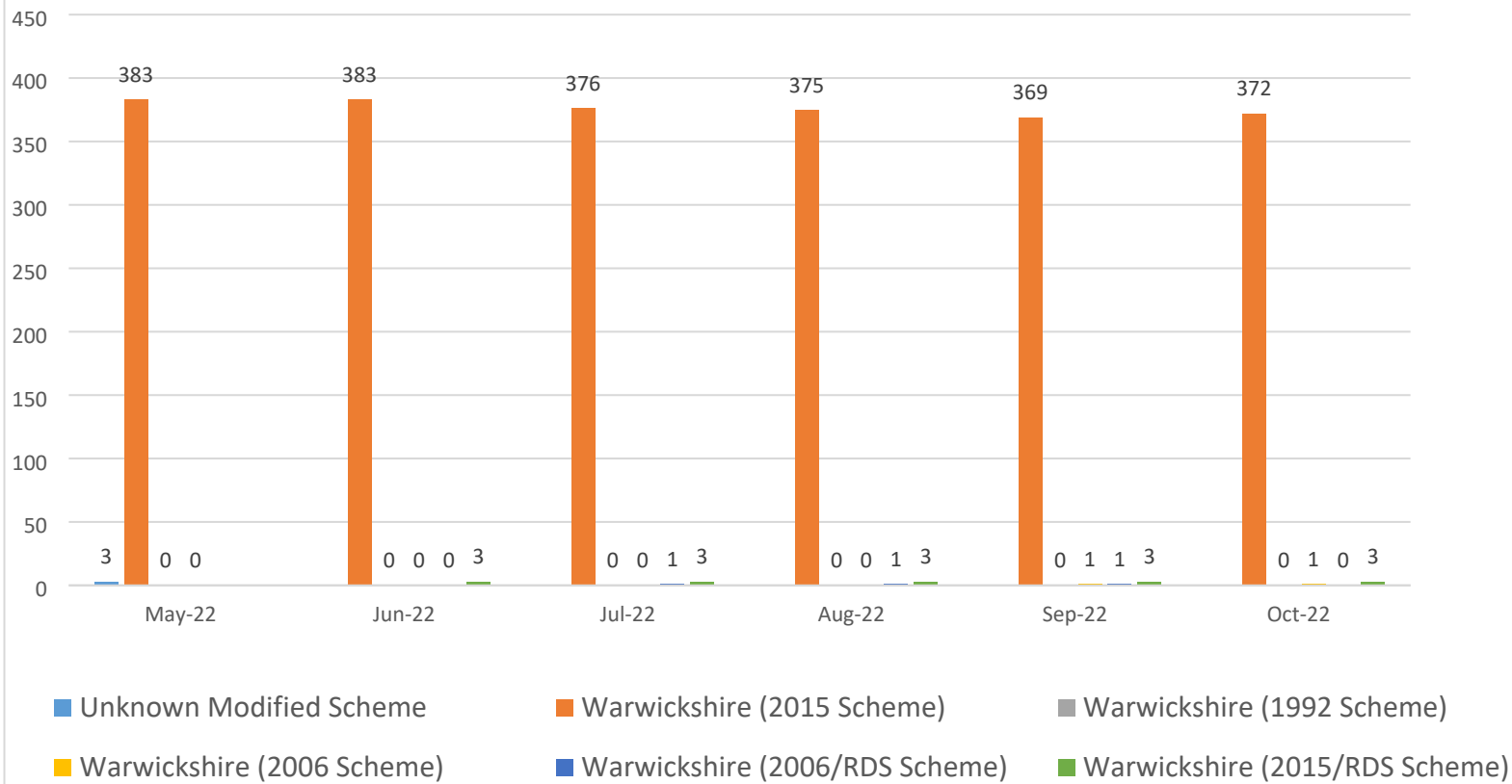
January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's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

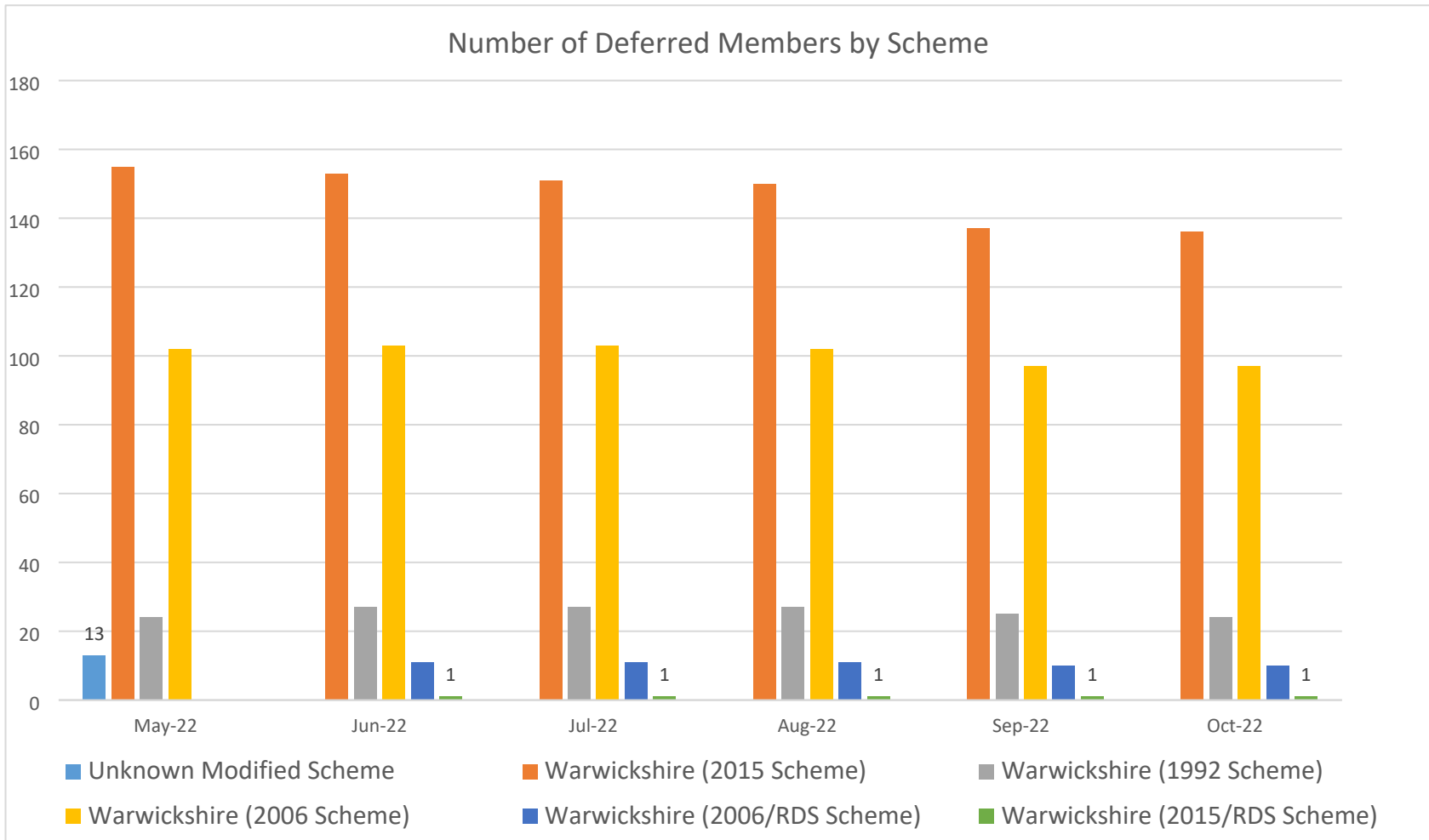
11.Membership Numbers

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

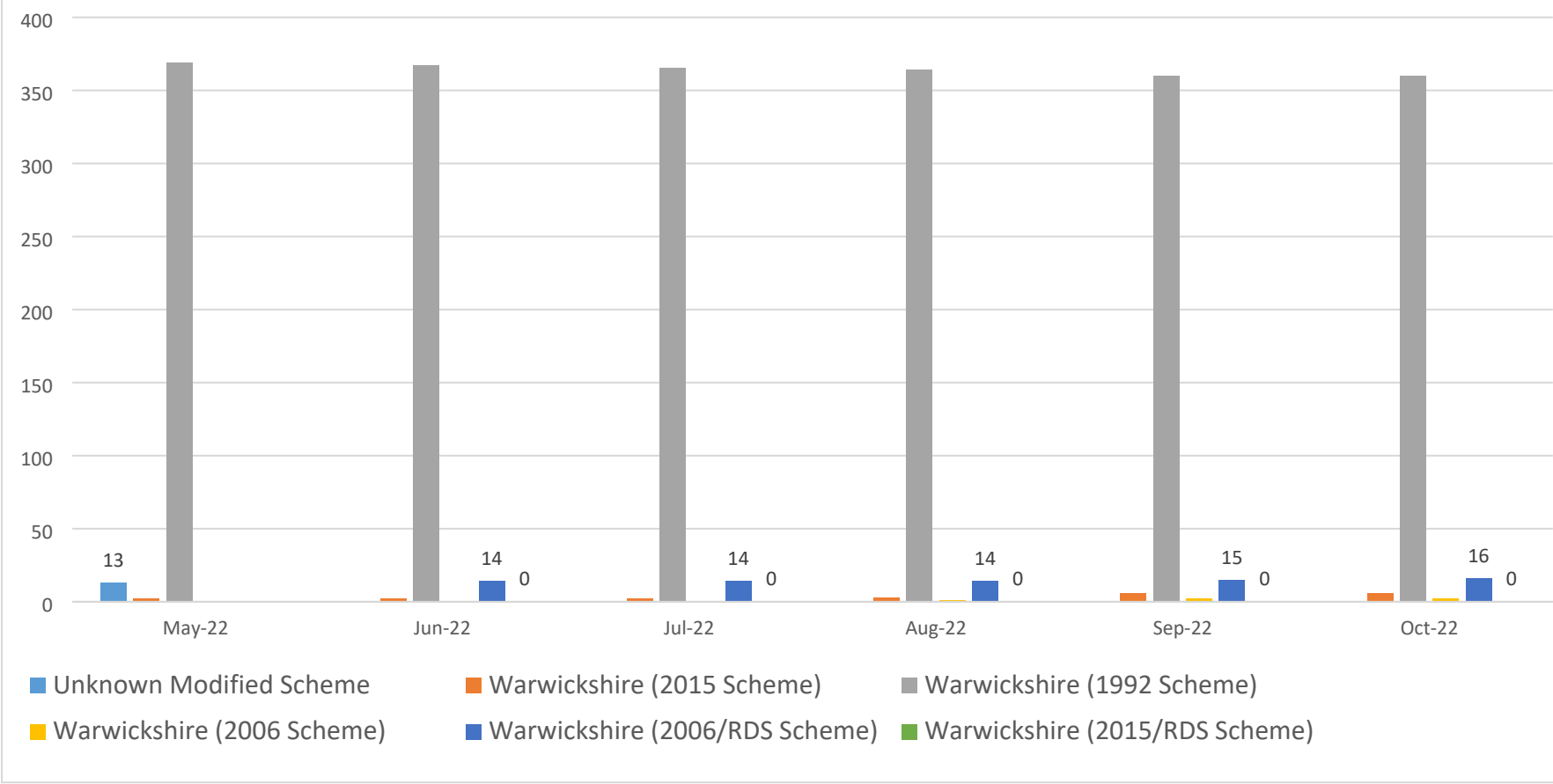


Number of Active Members by Scheme





Number of Pensioners by Scheme



12. Five Year Audit Plan 2019 – 2024

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

13. Overriding Disclosure Time Limits

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

Divorce Time limits

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