

Monthly Report

December 2022

Warwickshire Fire Authority



West Yorkshire Pension Fund

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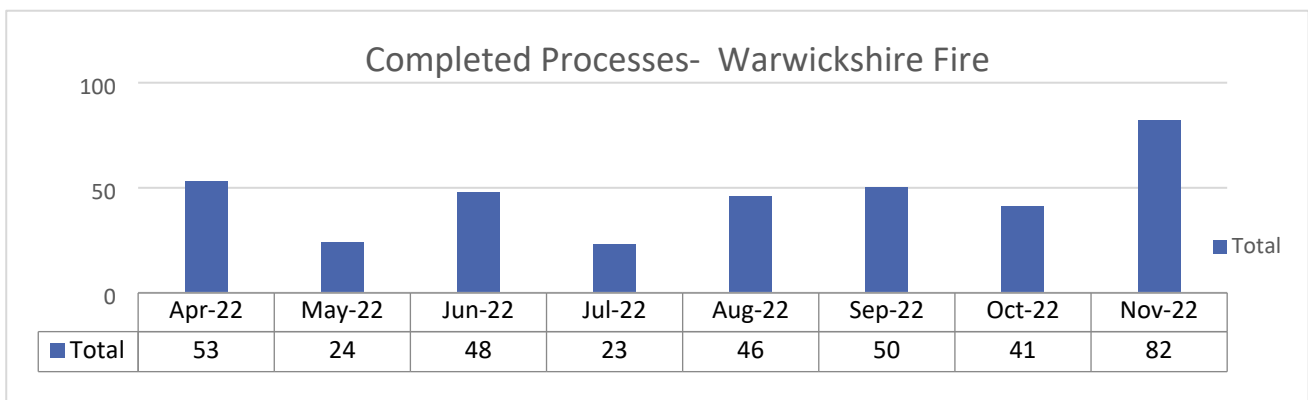


Contents

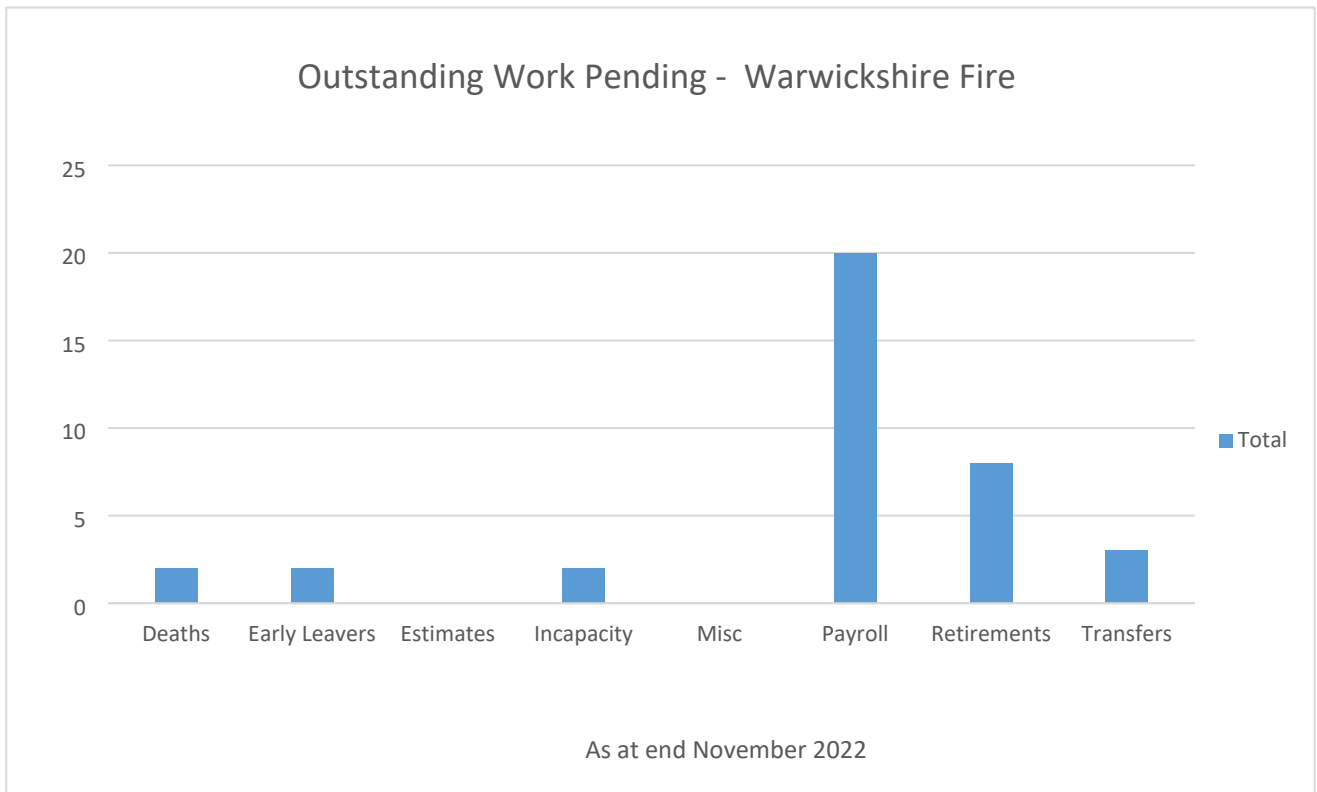
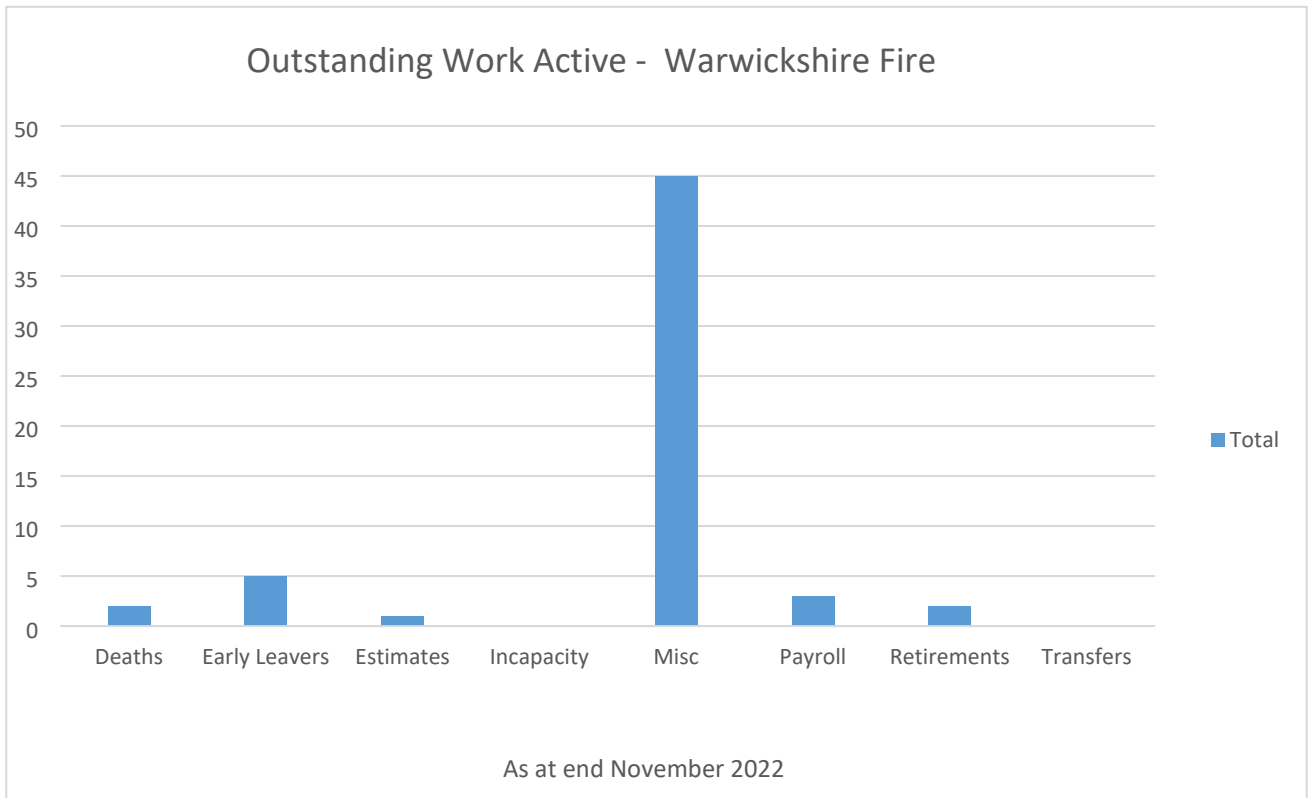
1 Completed work	4
2 Work in progress	5
3 Member web registrations	6
4 Membership Numbers.....	7
5 Administration Update	11
6 Communication & Training.....	11
7 Member Update	13
8 IT Update	13
9 Key performance Indicator update.....	14
10 Five Year Audit Plan	15
11 Overriding Disclosure Time Limits	16
12 Calendar of Events.....	18
13 Regulations/Fire Scheme Update	19

1.Completed processes

1 to 30 November 2022						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Divorce Settlement/Pension Sharing order Implemented	1	80	1	100	100	1
Deferred Benefits Set Up on Leaving	8	20	7	85	87.5	11.5
Pension Estimate	4	10	2	90	50	11
Pension Set Up/Payment of Lump Sum	2	3	2	85	100	3
Deferred Benefits Into Payment " Payment of Lump Sum	2	3	2	85	100	1
Retirement Actual	2	10	2	90	100	4
Set Up New Spouse Pension	2	5	2	85	100	4
Change of Address	2	20	2	85	100	1
Change of Bank Details	4	20	4	85	100	3.75
General Payroll Changes	7	20	7	85	100	1.57
Death in Retirement	2	10	1	85	50	13
Death on Deferred	1	10	1	85	100	5
Update Member Details	1	20	1	100	100	1
Dependant Pension To Set Up	2	10	1	100	50	7
Life Certificate	39	10	39	85	100	1.23
Initial letter Death in Retirement	2	10	2	85	100	2
Initial letter Death on Deferred	1	10	1	85	100	4
Monthly Pension	449	Pay date	449	100	100	



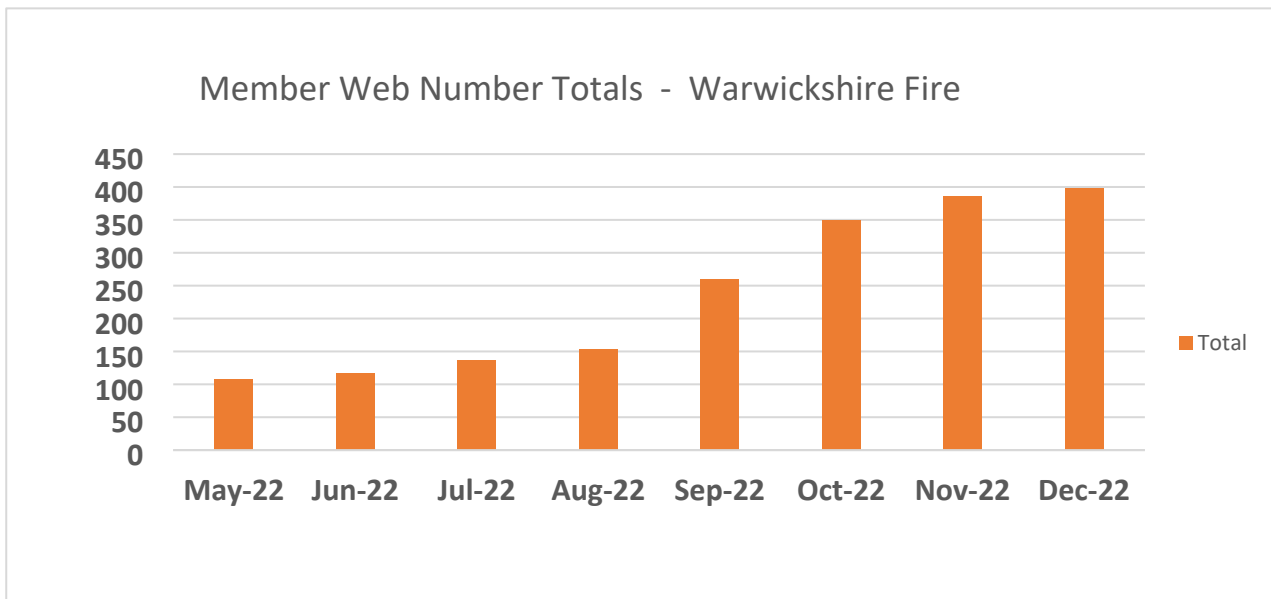
2. Work in Progress



3. Member Web Registrations

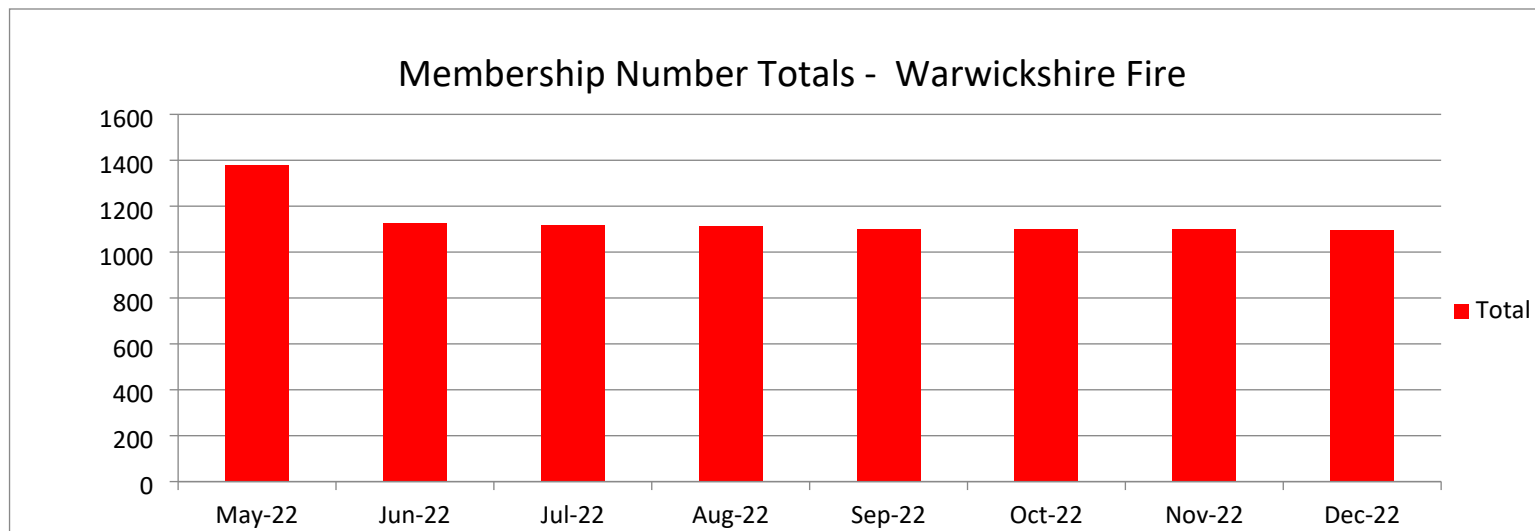
The number of members signed up to member web are:

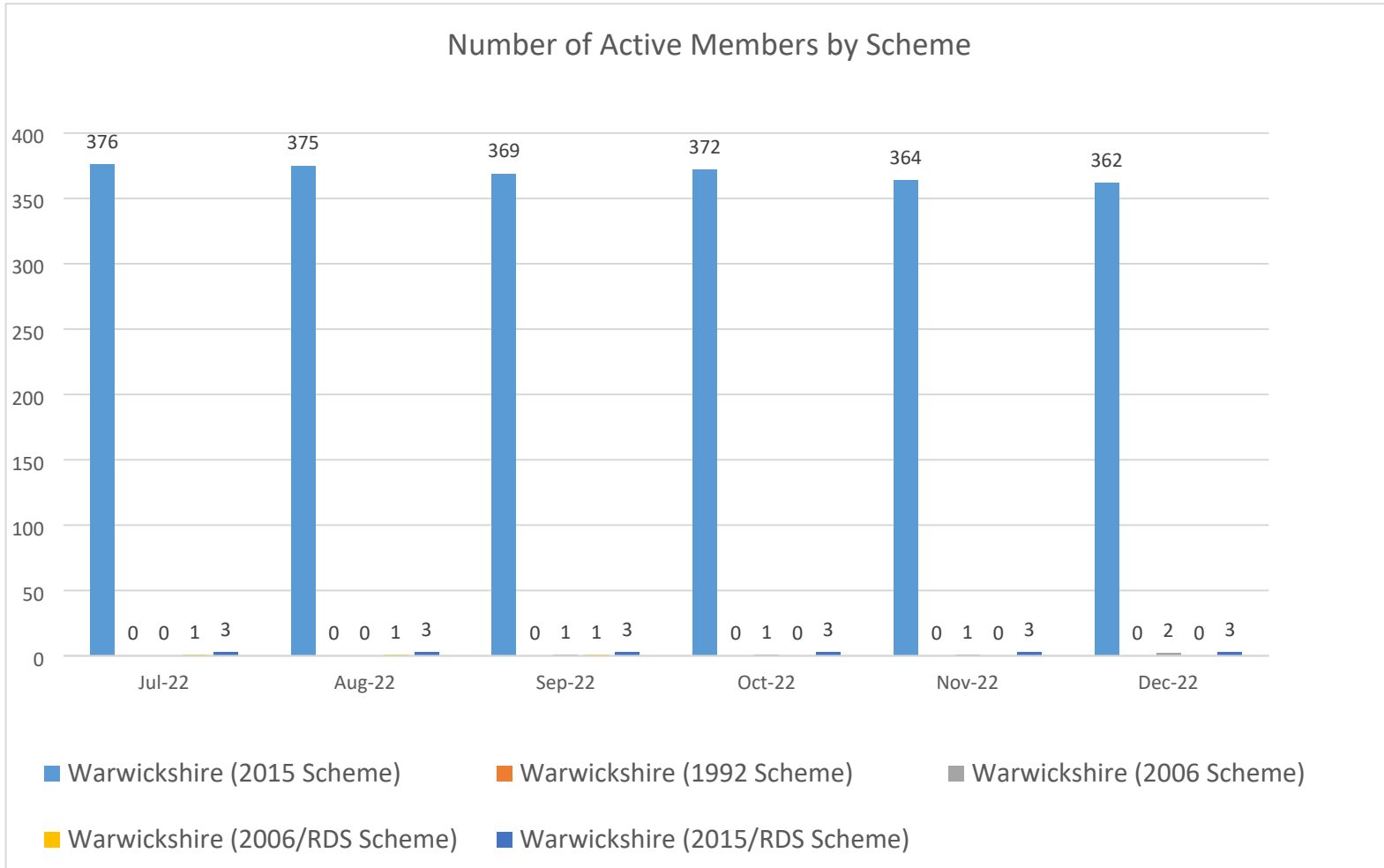
Status	Number
Active	144
Pensioner	185
Pensioner Ex-Spouse	0
Beneficiary Pensioner	10
Deferred Ex-Spouse	0
Deferred	59



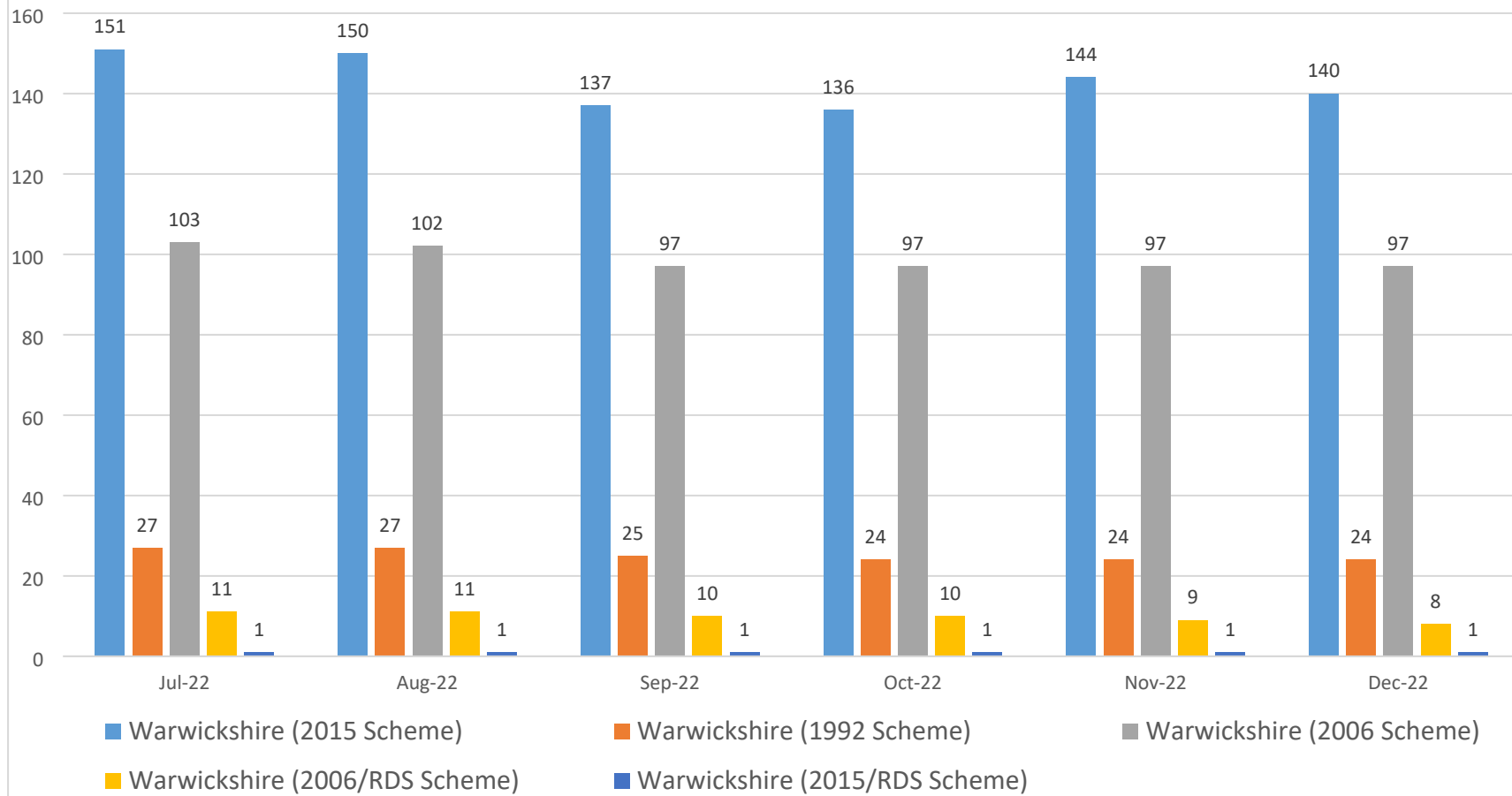
4.Membership Numbers

Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Warwickshire (1992 Scheme)	0	24	359	59	0	0
Warwickshire (2006 Scheme)	2	97	2	1	2	0
Warwickshire (2006/RDS Scheme)	0	8	18	0	0	0
Warwickshire (2015 Scheme)	362	140	10	4	3	2
Warwickshire (2015/RDS Scheme)	3	1	0	0	0	0

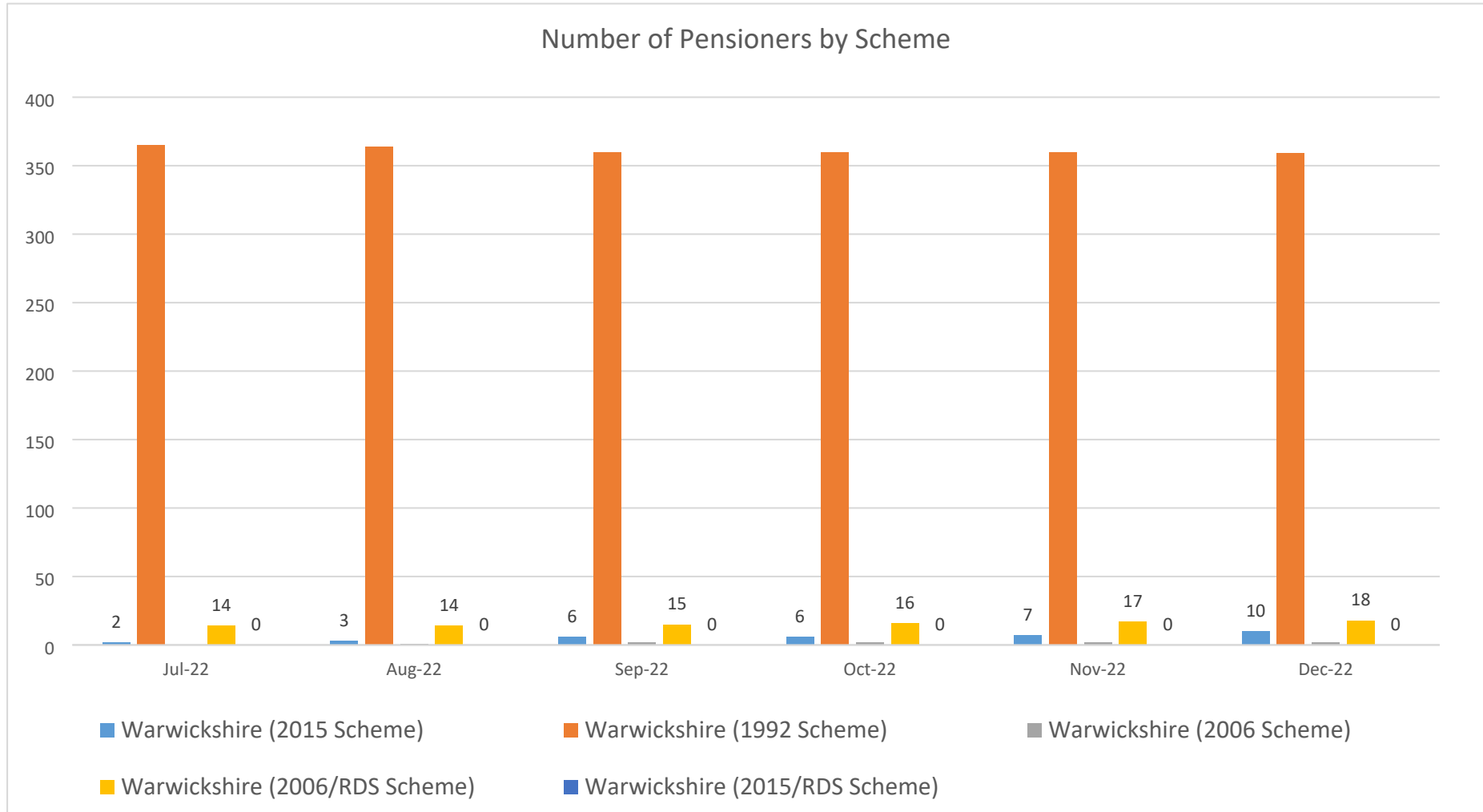




Number of Deferred Members by Scheme



Number of Pensioners by Scheme



5. Administration Update

Last month we mentioned the intended change to the monthly report to include Breaches/monthly postings information.

As we review and amend our processes we must be certain all FRAs understand and are compliant with the Disclosure Regulations. Our understanding, supported by the Fire Working Group (March 2018 meeting minutes), is that the responsibility to meet this legislation is that of the FRA and to do so they need to provide scheme information to new recruits within 2 months of the date of employment.

Disclosure of Information Requirements can be found at:

<https://www.fpsregs.org/images/admin/Disclosurev1.pdf>

Information can be provided in the form of a guide or factsheet and included with the contract of employment.

The factsheet, FPS 2015, can be found on the link below:

<https://www.fpsregs.org/index.php/administration-resources/factsheets>

Once all FRAs are compliant with disclosure regulations, WYPF can focus on creating new joiner records within our KPI target of 10 working days and sending the member a letter of confirmation. We will also develop a process for reporting any breaches to FRAs on a regular basis.

Current Monthly Postings

Having worked well throughout to the summer to bring postings up to date, I have now been informed that some postings for the months of October and November may not have been processed.

There are 2 reasons for this:

- The Team has experienced staff shortage this autumn due to illness, whilst experienced staff are dividing their time and efforts between completing postings and training new members of staff.
- Across the 23 FRAs there has been a significant amount of incorrect and late data provided. This causes the team additional work as they check, communicate and chase for data. This means they have less time available to process the accurate data files already received. Furthermore, there are a small number of FRAs yet to submit data from April.

Monthly Postings Data

Please find below helpful information for successful completion of the monthly postings spreadsheet. If you have any concerns about the data required each month please contact Helen, helen.scargill@wypf.org.uk, to discuss further.



Copy of Post April
2022 fire-scheme-pay

TPR Returns

WYPF submitted all TPR returns by 18 November.

Below is a copy of your return.

Scheme Name	TPR Score - Common	TPR Score - Conditional
Warwickshire (1992 Scheme)	98.2	95.72
Warwickshire (2006 Scheme)	82.52	82.52
Warwickshire (2006/RDS Scheme)	100	65.38
Warwickshire (2015 Scheme)	94.9	87.52
Warwickshire (2015/RDS Scheme)	100	25

Common data – used to identify scheme members and includes name, address, national insurance number and date of birth.

Conditional data – essential to calculate benefit entitlement such as pensionable pay and service history. It also encompasses data relating to events that occur during an individual's membership, for example transfers etc.

6. Communication & Training

Pre-Retirement seminars

Cambridgeshire – 14/11/2022
West Yorkshire – 17/11/2022
South Yorkshire – 21/11/2022

Pension Boards attended

Norfolk – 01/11/2022
Warwickshire – 07/11/2022
Leicestershire – 10/11/2022
Dorset & Wiltshire – 16/11/2022
Cambridgeshire – 25/11/2022
Shropshire – 25/11/2022
Buckinghamshire – 30/11/2022

Upcoming

Derbyshire – 05/12/2022
Lincolnshire – 13/12/2022

Regional Meeting

NERFOG – 23/11/2022

National Meetings attended

Home Office/LGA (RSS) – 08/11/2022

McCloud PDD/TWG meeting – 08/11/2022

SAB/HO Collaboration – 08/11/2022

LGA (Matthews & Remedy) – 18/11/2022

SAB/HO Collaboration – 21/11/2022

LGA Matthews TWG – 24/11/2022

Public Service Pensions – X Whitehall Project Management Group – 28/11/2022

XWH PMG Wraparound Session (HO) – 28/11/2022

SAB – cancelled

FRA training delivered by WYPF

Cambridgeshire – Annual Allowance – 15/11/2022

Cambridgeshire – Remedy Benefits – 15/11/2022

Buckinghamshire – Abatement – 18/11/2022

Meetings with FRA to discuss completion of Remedy Data Collection Extracts

Leicestershire – 01/11/2022

West Yorkshire – 10/11/2022

Northumberland – 22/11/2022

7. Member Update

None

8. IT Update

None

9. KPI Reporting

At the beginning of the year a new “dynamic” suite of KPI reports had been produced.

This was partly because our partners and clients felt the existing KPIs were not as accurate as they could be and partly because WYPF were aware the KPI measures had not been reviewed since they were introduced in 2015.

To ensure the new KPI reports are correct we entered into a process of checking the coding of the report, the work processes that could be measured, the days that could be measured and compared the data to the existing reports we had been using. Furthermore, we looked at the administration processes on UPM to ensure they aligned with the KPI measures.

Since we began this review in May we identified a significant number of areas where improvements could be made.

Below are some examples of the improvements made:

- Coding amended to measure against the correct days
- Test records removed from all measures
- Pended days removed. Days we cannot work the file, such as when a query is with an employer/FRA or member.
- Removed weekends and bank holidays from the measure
- Added pended steps into individual processes (so we don't count days we can't work a file).
- Aligned UPM and KPI time requirements to mirror each other
- Aligned target days and percentage measures in both LGPS and FPS KPIs for consistency of processing
- Added stages to processes so that estimates and actuals can be measured independently.
- Ensured all processes measure an end to end member experience, so from the day a piece of post, request for work, is added to a file to the day the last letter is sent or payment is made.
- Spoken to over 120 colleagues to explain KPIs and help them understand how they can affect the results.
- Encouraged all staff to ensure that if a file cannot be worked it is pended and/or notes are added to files to help with understanding should a KPI target not be met in any period.

The review was significantly more involved than first considered and involved a great deal of interaction between all areas of WYPF. We believe the new KPI measures are more accurate and transparent.

We will continue to review and in the event UPM processes are amended, or new ones introduced by our administration, we can add or amend a KPI to ensure a correct measure may be applied and reported.

The Resource Statement included in this month's report is an indication of our commitment and provides high level information about how we will manage the increasing challenges of pension administration for you.



KPI Resource
Statement - FIRE Dece



Current KPI list -
Fire.docx

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

12. 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

13. 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 63 - November 2022 \(fpsregs.org\)](#)

FPS

Age discrimination remedy – Ill-health factsheet on reassessment of cases

The [coffee afternoon held on 8 November 2022](#) had a focus on what retrospective action is required for ill-health cases under the age discrimination remedy.

As a reminder, a re-assessment of ill-health entitlement will not be needed in every case. It is only where, under rollback, the individual would qualify for alternative ill health benefits and the assessment criteria under the regulations sets a lower qualifying bar.

To help FRAs determine which individuals require a reassessment we have put together a [factsheet to ill-health re-assessments](#) which sets out the final policy in more detail.

Additionally, the factsheet encourages scheme managers to take immediate steps to review the cohort of membership which will require a re-assessment. This is to ensure that, come 1 October 2023, these cases can be dealt with as soon as possible. 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 ill-health re-assessment factsheet and ensure that appropriate action is taken where necessary.

FPS England SAB updates

SAB remedy engagement sessions

As 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.

The most recent sessions considered contingent decisions, divorce and CETVs. Material from some sessions has been added to a new page called [‘age discrimination remedy – Provision Definition Documents’](#) in the member restricted area of the FPS Regulations and Guidance area for the benefit of practitioners.

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

PDP publishes updated standards

On 16 November 2022, the [Pension Dashboard Programme \(PDP\) published its revised standards](#) for connecting to the dashboards ecosystem. They cover the technical and operational detail that underpins dashboards legislation. The revised standards incorporate feedback from the consultation published in July 2022 – see [FPS bulletin 59](#) – July 2022 for more information.

Although the revised standards are pending final approval by the Secretary of State for Work and Pensions, they have been published to give schemes advance notice of the duties that they will need to comply with.

PDP also confirmed the process for updating the standards going forward, including the principles for decision-making and the notice period for industry.

A consultation on the draft design standards for qualifying pensions dashboards will take place in the winter.

TPR consultation on dashboard enforcement

On 24 November 2022, the Pensions Regulator (TPR) launched a consultation on its dashboards compliance and enforcement policy.

The draft policy sets out TPR's expectations for scheme managers to achieve compliance with the Pensions Dashboards Regulations 2022 – 'the Regulations' and provides clarity on its approach to enforcement. Governing bodies of occupational pension schemes and third parties such as employers, administrators, and Integrated Service Providers (ISPs) are in the scope of the draft policy. TPR has the power to pursue these parties if it believes there has been a breach of the Regulations.

In monitoring compliance, TPR will focus on behaviours or breaches they consider pose the greatest risk to savers. Areas of particular interest are:

- connection: connecting by the scheme's statutory deadline, connecting all active, deferred and pension credit members, and remaining connected in line with relevant standards 9

[Click here to return to Contents](#)

- matching and returning accurate data: connecting the right member with the right data, failure to find a saver (i.e. failing to return a match made or a possible match) and failure to provide data in line with legal requirements.

TPR expects schemes to:

- operate adequate internal controls including risk management processes and processes to identify breaches of the law
- keep clear audit trails of steps to achieve compliance and resolve issues
- record their matching policy and data improvement process

TPR will monitor compliance using multiple sources of evidence. It may request additional evidence from schemes when it has concerns or to identify best practice.

Any enforcement action will be balanced against the outcome it may achieve. Breaches of the law that are persistent, intentional or indicate dishonesty are likely to be of higher priority.

TPR may issue compliance notices to trustees, scheme managers or third parties when a breach occurs. The purpose of a compliance notice is to stop noncompliance and avoid a repeat of the breach.

It may issue penalty notices to those parties in response to a breach or when they fail to comply with a compliance notice. Each penalty can be up to £5,000 for an individual and up to £50,000 in other cases. TPR will work with partner agencies and regulators and, where appropriate and permitted by law, share information with them.

You can find a [link to the consultation on the TPR website](#). The consultation closes on 24 February 2023.

HMRC

Public service pensions remedy newsletter

On 25 November 2022, HMRC published [Public service pensions remedy newsletter](#). The newsletter summarises the draft regulations and guidance that they are currently consulting on and confirms that HMRC is not able to respond to member queries related to the remedy.

Consultation on the Public Services Pension Scheme (rectification of unlawful discrimination) (Tax) regulations 2023

On 25 November 2022, HMRC published a [technical consultation on a draft statutory instrument](#), which ensures the pensions tax framework will apply as intended to pension scheme administrators and members affected by the public service pensions remedy.

The consultation seeks views from pension scheme administrators on the draft regulations. The regulations set out changes to how the pensions tax rules will apply to pension scheme administrators and members of public service pension schemes as a result of the public service pensions remedy. The regulations will make changes to how pensions tax legislation operates in certain circumstances, including changes to how schemes will need to report and pay extra tax charges or reclaim overpaid tax and ensure that schemes can pay pension benefits as authorised payments.

This legislation is intended to take effect from 6 April 2023, but some provisions will have a retrospective effect.

The consultation documents include an explanatory memorandum and guidance for administrators on the draft regulations. We will respond to the consultation and share our response before the consultation closes on 6 January 2023.

ACTION: FRAs and administrators are encouraged to respond to the consultation.

Legislation

Statutory Instruments

SI	Reference title
2022/1220	The Pensions Dashboards Regulations 2022
2022/1229	The Occupational Pensions (Revaluation) Order 2022
2022/1230	The Police, Fire and Crime Commissioner for Cumbria (Fire and Rescue Authority) Order 2022

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](#)