

**LEICESTER, LEICESTERSHIRE AND RUTLAND COMBINED FIRE
AUTHORITY
LOCAL PENSION BOARD**

To: Members of the Local Pension Board

Mr. D. Harrison CC

Cllr. N. Porter

Graham Vaux, Leicestershire Fire and Rescue Service

Adam Taylor, Leicestershire Fire and Rescue Service

Copies by email to:

Other Members of the Combined Fire Authority for information only

CFO and ACFO

Pension Scheme Manager, Leicester City Council

West Yorkshire Pension Fund

Dear Sir/Madam,

You are invited to attend a meeting of the **Leicester, Leicestershire and Rutland Combined Fire Authority's Local Pension Board** which will be held at **Leicestershire Fire and Rescue Service Headquarters** on **4 September 2024 at 10am** for the transaction of business set out on the attached Agenda.

Yours Faithfully



Lauren Haslam
Monitoring Officer



Leicestershire Fire and Rescue Service

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**LEICESTER, LEICESTERSHIRE AND RUTLAND COMBINED FIRE
AUTHORITY
LOCAL PENSION BOARD**

4 SEPTEMBER 2024 at 10AM

Location **Leicestershire Fire and Rescue Service, 12 Geoff Monk Way, Birstall,
Leicester LE4 3BU.**

Officer to contact **Aqil Sarang (Tel. 0116 305 6844)**

E-Mail **Aqil.Sarang@leics.gov.uk**

AGENDA

<u>Item</u>	<u>Report by</u>
1. Election of Chairman.	
2. Apologies.	
3. Minutes of the Local Pension Board meeting held on 12 March 2024.	(Pages 5 - 8)
4. Conflicts of Interest.	
5. Scheme Manager's Update.	The Pension Scheme Manager (Pages 9 - 56)
6. Scheme Administrator's Update. A verbal Update will be provided at the meeting.	
7. Employee Representative's input. A verbal update will be received from an employee representative.	
8. Date of next meeting. The next meeting of the Local Pensions Board will be held on 12 February 2025 at 10am at Leicestershire Fire and Rescue Service Headquarters.	
9. Any other business.	



Minutes of a meeting of the Leicester, Leicestershire and Rutland CFA - Local Pension Board held at County Hall, Glenfield on Tuesday, 12 March 2024.

PRESENT

Mr. N. D. Bannister CC (in the Chair)

Cllr. S. Barton

Adam Taylor

In attendance

Callum Faint, Chief Fire and Rescue Officer
Paul Weston, Assistant Chief Fire and Rescue Officer
Colin Sharpe, Pension Scheme Manager, Leicester City Council
Helen Scargill, West Yorkshire Pension Fund
Gemma Duckworth, Senior Democratic Services Officer
Sean Connor, Regional Pension Advisor, Derbyshire Fire and Rescue Service

9. Apologies.

An apology was received from Graham Vaux.

10. Minutes.

The minutes of the Local Pension Board held on 16 November 2023 were taken as read, confirmed and signed.

11. Conflicts of Interest.

The Chairman invited members who wished to do so to declare conflicts of interest in respect of items on the agenda.

No declarations were made.

12. Scheme Manager's Update.

The Board received a report of the Pension Scheme Manager which provided an update of the local management and administration of the Firefighters Pension Scheme. A copy of the report marked 'Agenda Item 4' is filed with these minutes.

National regulations for both the Sargeant/McCloud age discrimination remedy process and the Matthews second options exercise for on-call firefighters had taken effect from 1 October 2023, with an 18 month implementation period. As a result, the focus remained on delivering both remedy and second options. It was noted that the Finance and HR Teams continued to process day to day pensions work and the gathering of data relating to both the remedy and second options. This remained an ongoing challenge due to staff availability and experience. Assurance was given that Leicestershire seemed to be in a good position compared to FRAs nationally, although there was still a lot of priority work to do.

Confirmation had been received from Government that the currently accepted claims for 'Injury to Feelings' compensation would be paid nationally. However, the accepted claims did not cover all personnel who may feel aggrieved, and it was therefore felt that further legal proceedings remained a distinct possibility.

Members were informed that there had been one breach for the period, relating to the 'warm up' letters sent in December 2023 to former retained personnel expected to be eligible for the Matthews second options exercise and which had been returned as no longer at the address. This constituted a breach as the individuals did not receive the notification by the deadline of 31 December 2023. Attention was also drawn to the increasing risk of delays to the national timetable for implementing the age discrimination remedy.

Arising from the discussion, the following points were raised:

- i) In response to a query around the Matthews letters which had not reached the intended recipients, confirmation was given that although the response level was in line with neighbouring FRAs, plans were in hand to engage the services of a tracing agency to ensure all those who had not yet responded had been contacted to a current address. It had become apparent that the information in the letter was not well understood by many of the recipients and further general awareness raising was therefore being considered. The Board was assured that the letter had followed the national template, with some minor local clarifications. In terms of the cost of tracing, assurance was given that this was relatively low, particularly in terms of mitigating a potentially high risk. It was anticipated that there would be a high number of individuals who had moved addressed since leaving the Service, but the CFA would be responsible for any compensation cost if it was unable to show that best endeavours had been undertaken to attempt to contact all individuals concerned.
- ii) The fact that the team undertaking the work was very small posed a significant risk to ensuring the work was completed. However, support was received from the Regional Advisor and Scheme Administrator. The deadline of March 2025 to complete the work was statutory but it was felt that Leicestershire was in a relatively positive position. However, much of the work remained at the behest of what occurred nationally and it was noted that there were some delays to progress and more could be expected.
- iii) It was reported that further work would be required by West Yorkshire Pension Fund on the provision of Remedial Service Statements (RSS) for immediate choice members (personnel who had retired in the reformed 2015 scheme and who wished to revert to their legacy scheme for the remedy period), due to the Government Actuary's Department making available the second version of online calculators to determine retrospective employee contributions, interest and tax. Leicestershire had a relatively low number affected (due to previous decisions to implement immediate detriment when such personnel retired and to cease tapering into the 2015 scheme) and the amounts owed would be relatively small.
- iv) In terms of the rate of tax to be levied on the 8% interest on arrears of pension and lump sum, each individual case would need to be considered to determine whether any part of the interest would be liable to a 40% unauthorised payment charge.

- v) The Chief Fire and Rescue Officer reiterated that the FRA's resources were very lean and even if the Service had the capacity to recruit more staff, it would be difficult to find a Firefighter Pensions expert. However, he stressed that there was a deadline to meet.

RESOLVED:

It was moved by Mr Bannister CC and seconded by Councillor Barton that the update be noted.

13. Scheme Administrator's Update.

The Board received a verbal update from West Yorkshire Pension Fund (WYPF) as the Pension Scheme Administrator on the administration of the Firefighter Pension Scheme since the last meeting. A copy of the March 2024 Monthly Report had been circulated to the Board. Along with the information provided in the report, members were informed of the following:

- There were two areas where the target had not been met and it was noted that some work remained outstanding.
- There had been a small increase in the number of member web registrations. Information to encourage more people to sign up would be sent out with the annual statements.
- A survey had been received from the Scheme Advisory Board relating to data around the Sargeant/McCloud age discrimination remedy process. WYPF would be naming FRA's in its response to the survey, unless the FRA specifically state that it did not want to be named. It was noted that there were no issues with the data received from Leicestershire. The only thing outstanding was the GAD calculation, although this had not been received from any authority due to the delay.
- It was stated that in April, there would be a benefits increase by the relevant Pensions Increase Order. WYPF would be undertaking updates from next week and should be completed by the deadline of 8 April so that everyone was receiving their increased pension.
- A number of cases had been calculated incorrectly and these would be reviewed over the coming months. This primarily related to part-time benefits.
- It was noted that more pre-retirement information courses had been added and FRAs would be asked to communicate these to members. There were also induction courses on the fire pensions scheme and a range of other training courses available. Training for WYPF employees on the changes to lifetime and annual allowances was also being arranged.
- Details were provided of the meetings attended by WYPF
- In relation to the CARE revaluation (where the national increase applied was subsequently updated), all records for active members had now been updated and work would commence on pensioner members.
- It was pleasing to report that there had been no data breaches and no non-conformity with ISO 9001.

RESOLVED:

It was moved by Mr Bannister CC and seconded by Councillor Barton that the update provided on the administration of the firefighter pension scheme be noted.

14. Employee Representative's input.

Employee representatives had nothing further to report.

15. Date of next meeting.

The next meeting of the Local Pension Board would be held on 4 September 2024 at 10am.

10.00 - 10.55 am
12 March 2024

CHAIRMAN

Status of Report: Public

Meeting: Local Pension Board

Date: 4 September 2024

Subject: Scheme Manager's Report

Report by: The Scheme Manager

Author: Colin Sharpe, Scheme Manager

For: Discussion

Purpose

1. To provide an update on the management of the Firefighters' Pension Scheme.

Recommendation

2. The Local Pension Board is asked to:
 - a) Note this update and make any comments to the Chief Fire and Rescue Officer, Scheme Manager and/or the CFA.

Executive Summary

3. The Board has previously received updates on the Sargeant/McCloud age discrimination remedy process and the Matthews second options exercise for on-call firefighters.
4. National regulations for both took effect from 1 October 2023, with an intended 18-month implementation period. Therefore, the focus remains firmly on delivering both remedy and second options. Whilst some issues have been resolved nationally, numerous complexities continue to arise, particularly around taxation, the interplay of schemes, developments in the scope of eligibility, pensions software development and calculator tools. Recruiting and retaining sufficient knowledgeable and experienced staff remains a key challenge across FRAs and administrators. Staff morale is being highlighted nationally as an increasing concern. It is therefore proving not possible to progress the remedy and the second options exercise in a timely manner as envisaged by the Regulations.
5. The Board will recall that Sargeant/McCloud remedy relates to age discrimination held to have arisen from the transitional protection arrangements for wholetime personnel upon the introduction of the 2015 scheme. The courts have been clear that scheme members should be placed back in the position they would have been, had the discrimination not occurred.
6. The Matthews second options exercise relates to certain former and current on-call firefighters who are now able to buy back 2006 scheme membership from the start of their

applicable service (which in some cases stretches back to the 1960s), as part-time workers.

7. Previous reports to the Board provided more in the way of detail of the age discrimination remedy and the second options exercise.
8. The datasets for the age discrimination remedy are largely complete and ready for the Scheme Administrator, West Yorkshire Pension Fund (WYPF) to process. Good progress has been made with contacting current and former on-call personnel about the second options exercise, also with gathering together their historical service and pay data ready for performing the necessary calculations of pension entitlements and contributions.
9. Government confirmed some time ago that the presently accepted claims for 'Injury to Feelings' compensation, arising from the age discrimination, will be paid nationally. The Board may recall this relates to compensation for anger, distress, anxiety etc. and for any out-of-pocket losses. However, the accepted claims do not cover all personnel who may feel aggrieved, therefore further legal proceedings remain a distinct possibility. The position does not appear to have changed since the Board's previous meeting.
10. The 'connect by' date for the new national Pensions Dashboard for all three pension schemes (1992, 2006 and 2015) is 31 October 2025. This is intended to be in good time for the legislative deadline of 31 October 2026. In practice, this is primarily a task for WYPF as administrator, although is the CFA's responsibility. The dashboard is intended to enable people to find summary details of all their pensions in one place. Further details can be found at <https://www.pensionsdashboardsprogramme.org.uk/>.
11. The Pensions Act 2004 requires that The Pensions Regulator be informed of breaches of the law where that breach is likely to be of material significance. The Board's attention is drawn to a material breach that the Scheme Manager intends to report, concerning a delay to the Annual Benefit Statements for the 244 scheme members who are 'in scope' of the age discrimination remedy.
12. The Scheme Manager has not made any significant individual decisions since the previous meeting. However, he has accepted evidence of the service start dates of former on-call firefighters for the Matthews second options exercise. The Scheme Manager and the Monitoring Officer continue to be very closely involved in the progression of a particular individual age discrimination remedy case.
13. The LGA national firefighter pensions AGM and conference is scheduled for 18 and 19 September, with details already circulated to the Board. The LGA also provides other training opportunities, which are listed in the FPS Bulletins on the LGA website and towards the end of the WYPF monthly report at Appendix A.
14. The risk register has been reviewed and updated and is attached at Appendix B.
15. The Board may also wish to note that as the Service engages its own statutory Treasurer, the Scheme Manager role will transfer to the interim postholder during the course of September. This report is therefore the last by the present Scheme Manager.

Background

Local Management and Administration

16. The local management and administration of the scheme continues. The Finance and HR teams continue to process day to day pensions work. Aside from the day-to-day work, the team is focussed on gathering of past pay data relating to the age discrimination remedy (Sargeant/McCloud) and the on-call firefighters second options exercise (Matthews).

- The individual datasets for the age discrimination remedy are largely complete and ready for WYPF to process, so that current and former wholetime firefighters can be properly and accurately informed of the financial implications of the choices open to them. Some 244 members are in scope. Anecdotally, Leicestershire seems to be in a good position relative to the FRAs nationally and regionally. There are, however, concerns at the resourcing levels in WYPF to take forward the processing of the Remedial Service Statements (RSS).
 - In practice, the immediate tangible impact is that firefighters who retired between April 2015 and April 2021 having been tapered into the 2015 scheme are still waiting for their RSS, and hence to be able to elect to return to their legacy 1992 or 2006 scheme with its generally better pension benefits.
 - Whilst in law the Scheme Manager has until 31 March 2025 to issue an RSS, FRAs are expected by the regulatory bodies to issue affected individuals with their RSS and to progress to the payment of remedy benefits in a timely manner.
 - However, importantly, members who have retired since April 2022 and those now approaching retirement are receiving the necessary financial information / RSS and so are able to revert to their legacy scheme for the remedy period and receive the correct lump sum and pension.
- Good progress has been made with contacting some 402 current and former on-call personnel about the second options exercise, of whom approaching 200 (or their representative) have replied expressing an interest.
 - The Board will recall that letters were issued to last recorded addresses ahead of the statutory deadline of 30 December 2023 for 'warm up' communications (although a technical breach occurred in relation to those personnel no longer at that address, as reported to the previous meeting).
 - For those who haven't replied, the services of a tracing agency have been employed to identify current addresses, deaths and surviving relatives. The Finance team is in the process of sending further letters accordingly. It is important that reasonable efforts are made to establish contact and to raise awareness (as reported to the previous meeting) and that this can be evidenced.

- Much gathering of on-call individuals' historical service and pay data has been undertaken. The next step is to perform the necessary calculations of pension entitlements and contributions using national calculator tools. These are not straightforward and the LGA is working on guidance for a range of scenarios. The Scheme Advisory Board has set out a suggested priority order for processing, with the statutory implementation period ending on 31 March 2025. It seems increasingly unlikely that implementation will be complete locally and indeed at many FRAs. It is possible this date will be extended, potentially linked to some widening of eligibility and/or benefits. If it is not, then a reportable breach may occur and the FRA could be open to challenge by individuals awaiting their new or increased pension. Further details can be found at:
<https://fpsmember.org/matthews-remedy/what-matthews-remedy>

Uncertainties and Difficulties

17. Much clarity and certainty has been provided by legislation, regulations and the ongoing development of national working approaches. However, new uncertainties and difficulties continue to arise due to the complexity of the exercises and the interplay with the tax system in particular. As noted above, these cause delays in data processing, systems developments and in reaching the conclusion of individual cases. They also cause on-going frustration for staff and affected scheme members.
18. They can be grouped broadly into:
 - Tax issues - including duplicate Unauthorised Payment Charges that would be payable on some lump sums and the payment of pension arrears triggering higher rate income tax deductions;
 - Errors, omissions and unintended consequences in the legislation and regulations - for example in certain cases where a member opted out of the pension scheme due to the 2015 changes and now wishes to exercise a 'contingent decision' to opt back in for the remedy period, they would not be returned to the correct scheme;
 - Shortfalls, gaps and uncertainties in historical pay and service data - principally affecting the second options exercise for former on-call personnel who were employed many years ago;
 - On-going development and refinement of the GAD (Government Actuary Department) calculators - particularly affecting the second options exercise;
 - A gradual widening of the scope (actual and potential) of the exercises - in particular eligibility for the second options exercise and the resulting pensions benefits; and
 - 'Aggregation' - whereby on-call personnel who subsequently became wholetime may be able to roll up their 2006 on-call pension into the wholetime pension up until the end of the remedy period on 31 March 2022. The 2006 pension itself may firstly be subject

to the Matthews second options exercise. This was a known unresolved topic when the 2023 legislation came into effect.

19. The Home Office, Treasury, HMRC and LGA are well aware of these various matters and are working to resolve them.

Breaches

20. The Board's attention is drawn to a material breach that the Scheme Manager intends to report to The Pensions Regulator. This concerns a delay to the Annual Benefit Statements for the 244 active scheme members who are 'in scope' of the age discrimination remedy.

- WYPF has produced the usual Annual Benefit Statement (ABS) for all active members "not in scope" of the age discrimination remedy. For Leicestershire, all 316 of these members have received their statement.
- For active members 'in scope' of the remedy, where administrators are unable to provide a combined ABS/Residual Service Statement by 31 August 2024 (showing 2015 and legacy scheme benefits), the national expectation is that a 'rolled back' ABS should be provided instead. However, WYPF are unable to do so across their FRA client base due to software and other constraints, hence a delay letter was distributed to such members in July. WYPF presently expects to provide an ABS/RSS by 31 December. This affects 244 members locally. WYPF will report a breach to the Regulator in early September and provide a copy which scheme managers can use in their own reporting to the Regulator.
- It should, however, be noted that members approaching retirement are receiving all the necessary information, with WYPF utilising some manual processes.

21. The Board should also be made aware that WYPF is working on Pensions Savings Statements for 2023/24 which are required to be issued by 6 October, however, due to the aforementioned issues these are manual calculations. Statements are required for members whose pension contributions exceeded the Annual Allowance. However, due to higher inflation rates and the higher allowance threshold, the number reaching or breaching the limit will be significantly less than those in recent years. No reportable breach is presently expected.

22. The Board will also note the potential for a future breach regards the implementation of the second options exercise, as noted at para.16 above.

Regional and national updates and communications

23. Meetings continue to be held with the Regional Adviser and with colleagues at Derbyshire and Nottinghamshire. Staff attend the LGA 'coffee mornings', where general updates are provided, together with a focus on particular topics.

24. Staff also attend meetings with WYPF as the scheme administrator. A tailored monthly client report is received, which provides useful general administrative information, local

scheme statistics and enables any specific issues to be picked up and addressed. The August report is attached as Appendix A. The Board will receive an update from the WYPF representative.

25. The Regional Adviser and WYPF presented an online 'roadshow' for scheme members across the three FRAs in November 2023. This covered the fine detail of the Sargeant/McCloud remedy, retirement options and a short introduction to the Matthews second options buy-back exercise. The event was recorded and is available online, along with a detailed presentation on the Matthews second options exercise.
26. The LGA national firefighter pensions AGM and conference is scheduled for 18 and 19 September 2024, with details already having been circulated to the Board. The LGA also provides other training opportunities, which are listed in the FPS Bulletins on the LGA website at <https://fpsregs.org/index.php/bulletins-and-circulars/bulletins> and towards the end of the WYPF monthly report at Appendix A.

Risk Register

27. Good governance requires that a Risk Register is in place and is regularly reviewed. It is also a requirement of The Pensions Regulator's code of practice on the governance and administration of public service pension schemes.
28. The Register presented has been reviewed and updated to reflect the enhanced risks to timelines from national issues. It can be found at Appendix B.

Report Implications/Impact

29. Legal (including crime and disorder)

This report has been written to inform Members of the latest legal developments relating to the Firefighters' Pension Scheme and how the service is working on resolving the current situation.

The Public Service Pensions Act 2013 introduced a framework for the governance and administration of public service pension schemes. This report aims to fulfil the requirement for Members to assist the Scheme Manager in ensuring that effective administration arrangements are in place.

30. Financial (including value for money, benefits and efficiencies)

Remedy and compensation payments will either be a scheme payment and therefore from the pension fund account, or an employer payment which cannot be met from the pension fund account and will fall to the Authority to fund. The Service aims to avoid the latter, although as national complexities and uncertainties exist, the risk of an employer payment becoming necessary does exist.

Whilst employees will pay additional backdated contributions or receive refunds as the case may be, this will not apply to the Service as the employer. Rather, the future pension cost implications upon the notional 'fund' nationally will be included in future revaluations, which is expected to increase the employer contribution rate. The employer rate increased from 28.8% to 37.6% of pensionable pay from April 2024, based on the most recent 2020 valuation. The Government committed to fund FRAs for the increase in 2024/25 only. The higher employer rates are potentially a risk to FRA budgets nationally from 2025/26.

Additional day-to-day costs are being incurred meeting the requirements detailed in this report, for example staffing, systems and legal support. Some Government funding is received towards these costs.

Stuart McAvoy, Head of Finance, Leicester City Council

31. Risk (including corporate and operational, health and safety and any impact on the continuity of service delivery)

The CFA continues to face a number of risks associated with the management of pensions and the implementation of the Sargeant/McCloud age discrimination remedy and the Matthews on-call second options exercise.

32. Staff, Service Users and Stakeholders (including the Equality Impact Assessment)

An equality impact assessment has not been carried out, as the Service is seeking to correct inequalities as identified by court proceedings and judgments, and latterly set out in legislation effective from 1 October 2023.

33. Environmental

There are no environmental implications arising from this report.

34. Impact upon "Our Plan" Objectives

There are no specific impacts, although a general impact on all 'People' related elements of the plan.

Appendices

Appendix A – WYPF monthly report, August 2024
Appendix B – Risk Register

Background Papers

Previous Local Pension Board agendas.

Officer to Contact

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Monthly Report

August 2024

Leicestershire Fire Authority



West Yorkshire Pension Fund

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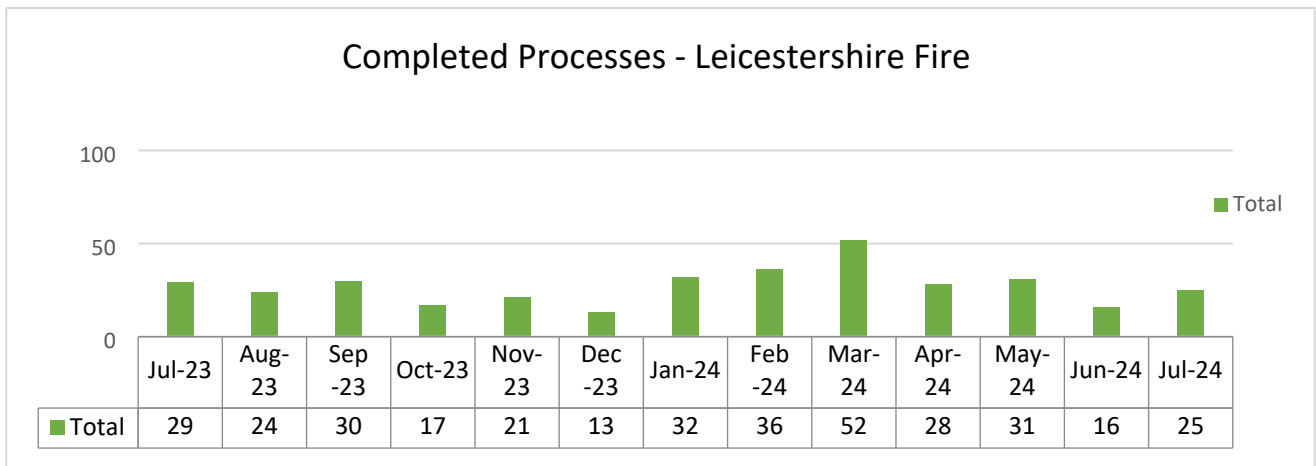


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1. Completed processes

1 to 31 July 2024						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Transfer In Quote	2	35	2	85	100	12
Deferred Benefits Set Up on Leaving	3	20	0	85	0	93.67
Pension Estimate	2	10	2	90	100	1
Set Up New Spouse Pension	2	5	2	85	100	2.5
Change of Address	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	17
Death in Retirement	2	10	0	85	0	29
Update Member Details	2	20	2	100	100	1
Dependant Pension To Set Up	2	10	2	100	100	4.5
Transfer Out Quote Fire	1	35	0	85	0	123
Life Certificate	1	10	1	85	100	1
Initial letter Death in Retirement	2	10	2	85	100	4
Monthly Pension	765	Pay date	765	100	100	

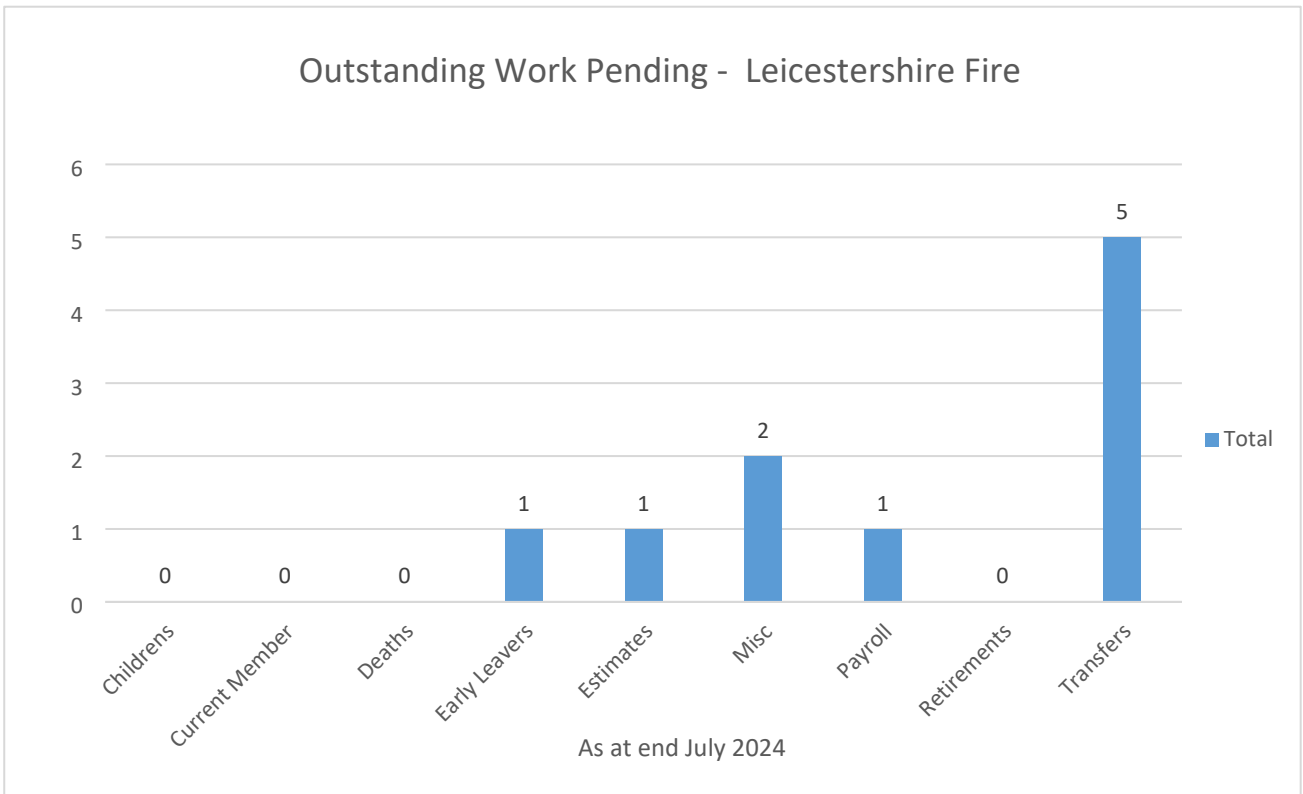
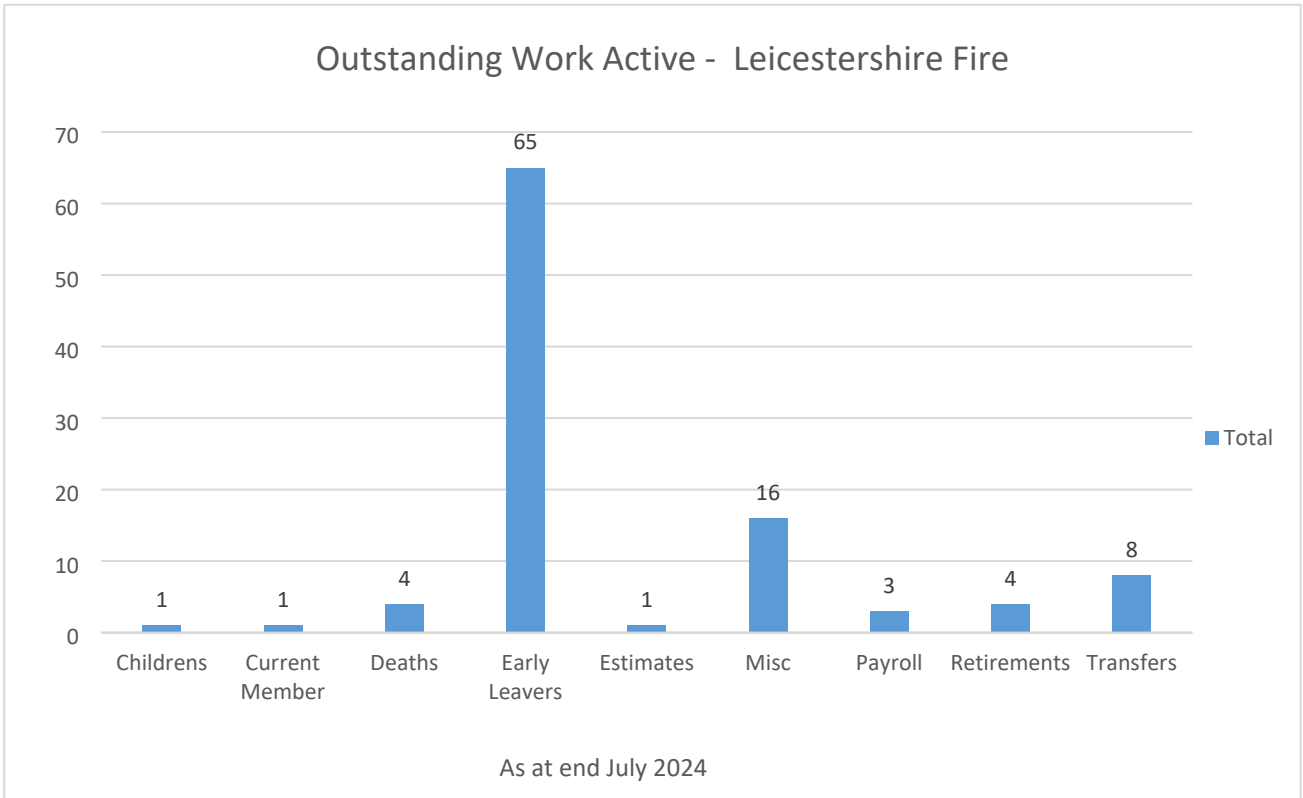


Deferred Benefits Set Up on Leaving did not meet due to high volumes of work within the team, however, the members did receive confirmation within 2 months of WYPF receiving the leaver information that they have a deferred benefit. This meets the statutory requirements.

Death in Retirement did not meet due to the team experiencing high volumes of work.

Transfer Out Quote did not meet due to the team experiencing high volumes of work.

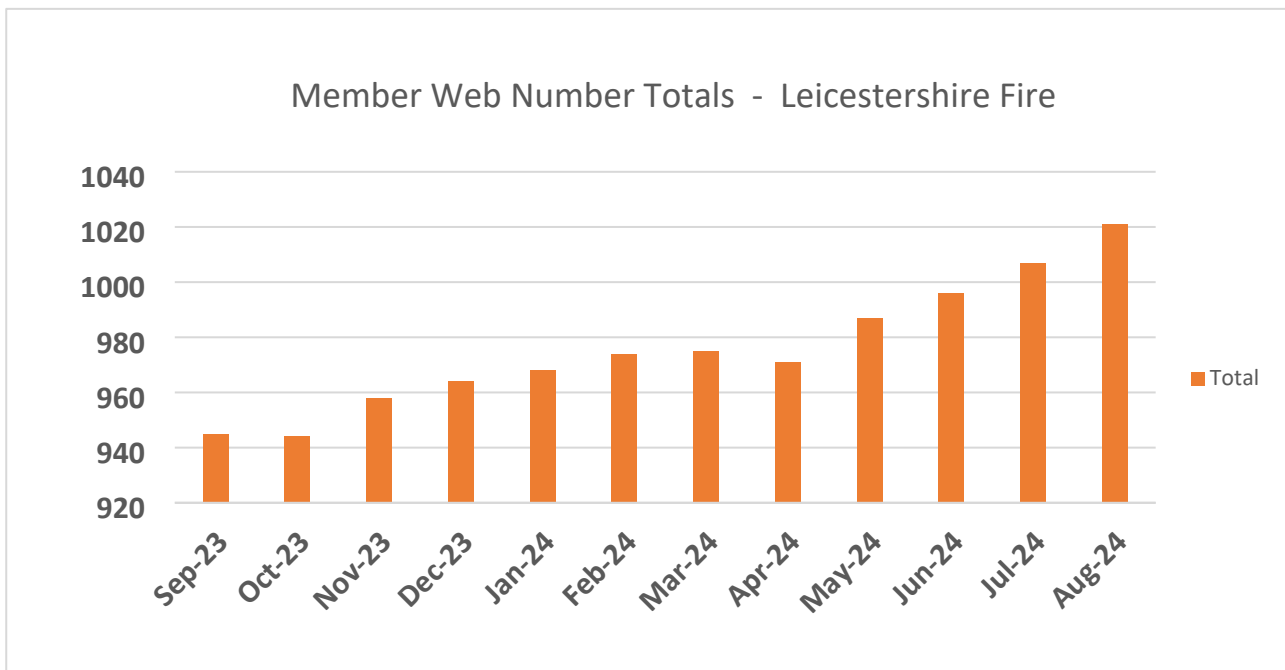
2. Work in Progress



3. Member Web Registrations

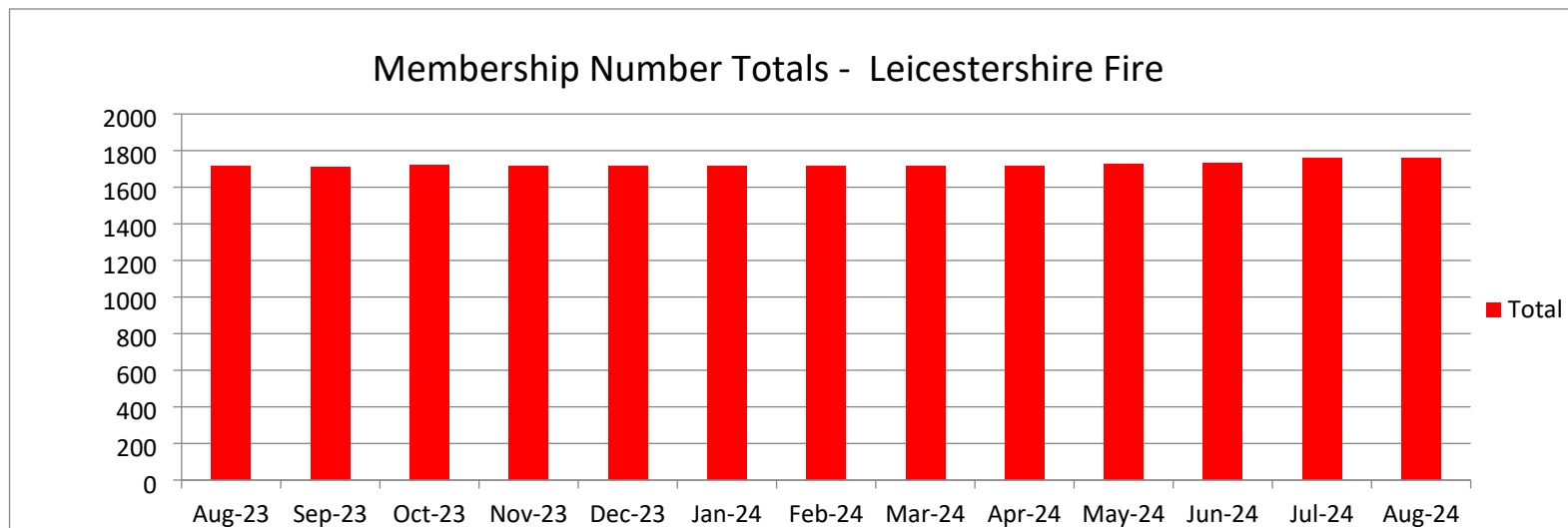
The number of members signed up to member web are:

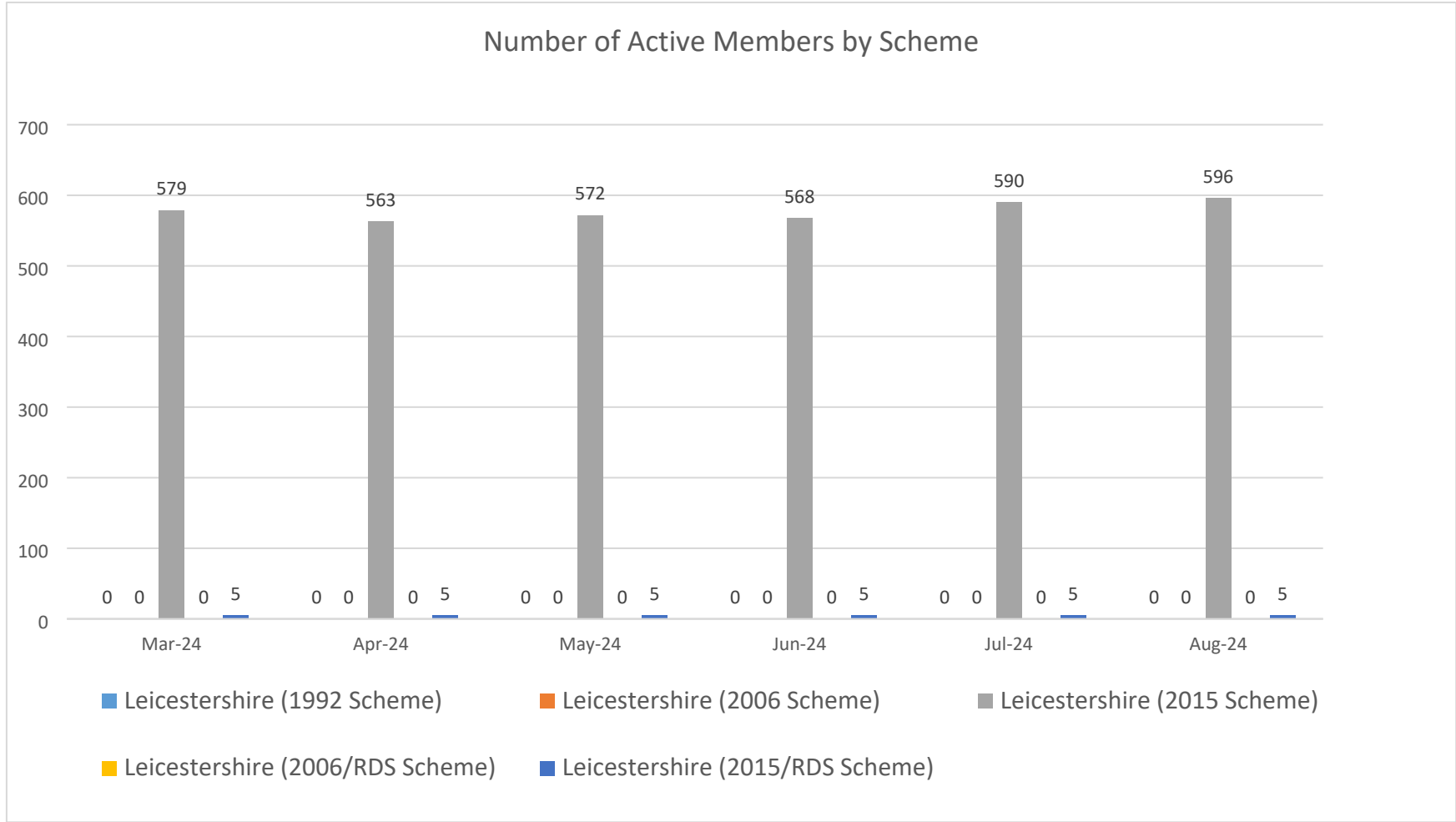
Status	Number
Active	355
Pensioner	466
Pensioner Ex-Spouse	0
Beneficiary Pensioner	38
Deferred Ex-Spouse	0
Deferred	162



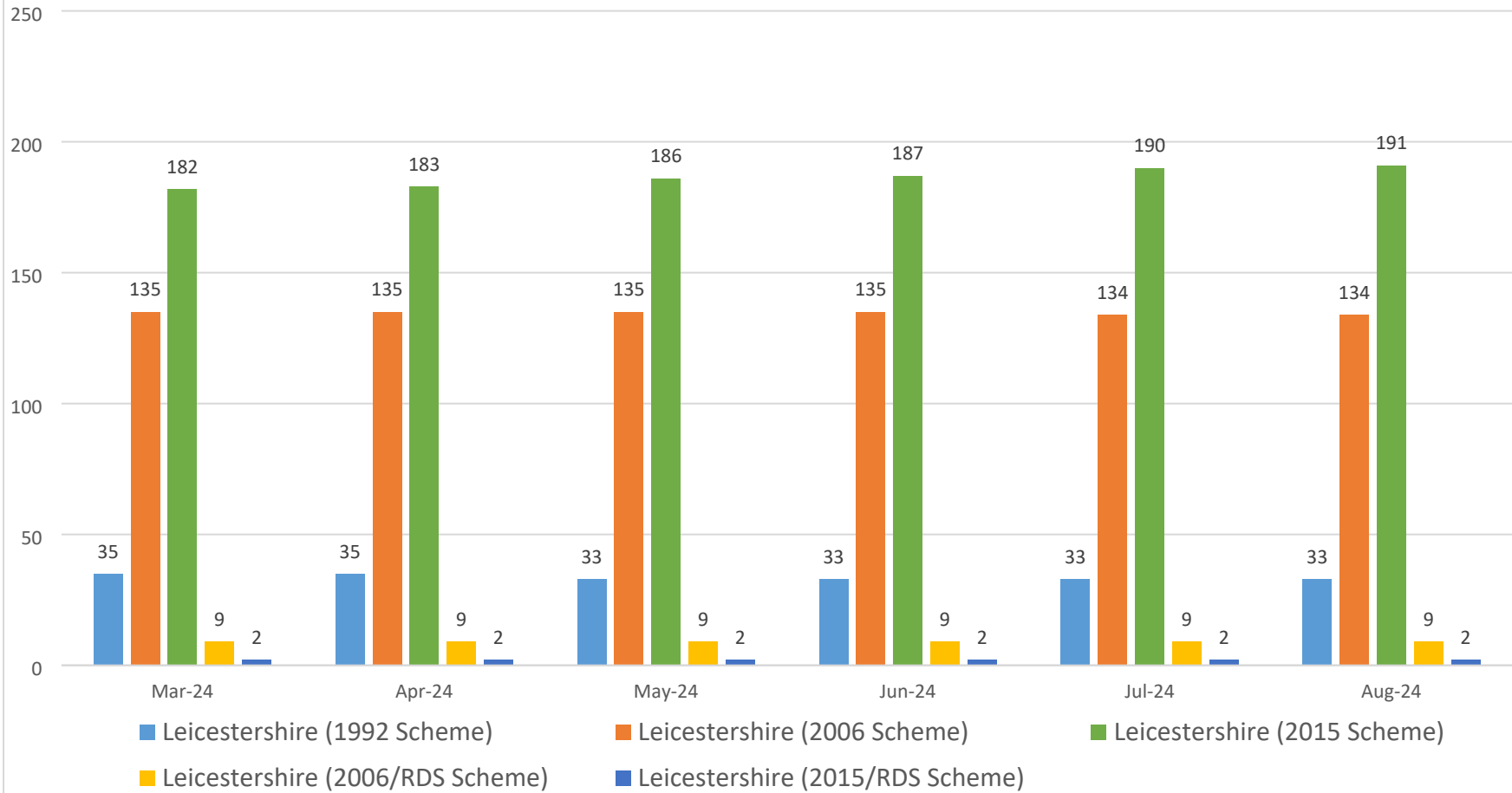
4.Membership Numbers

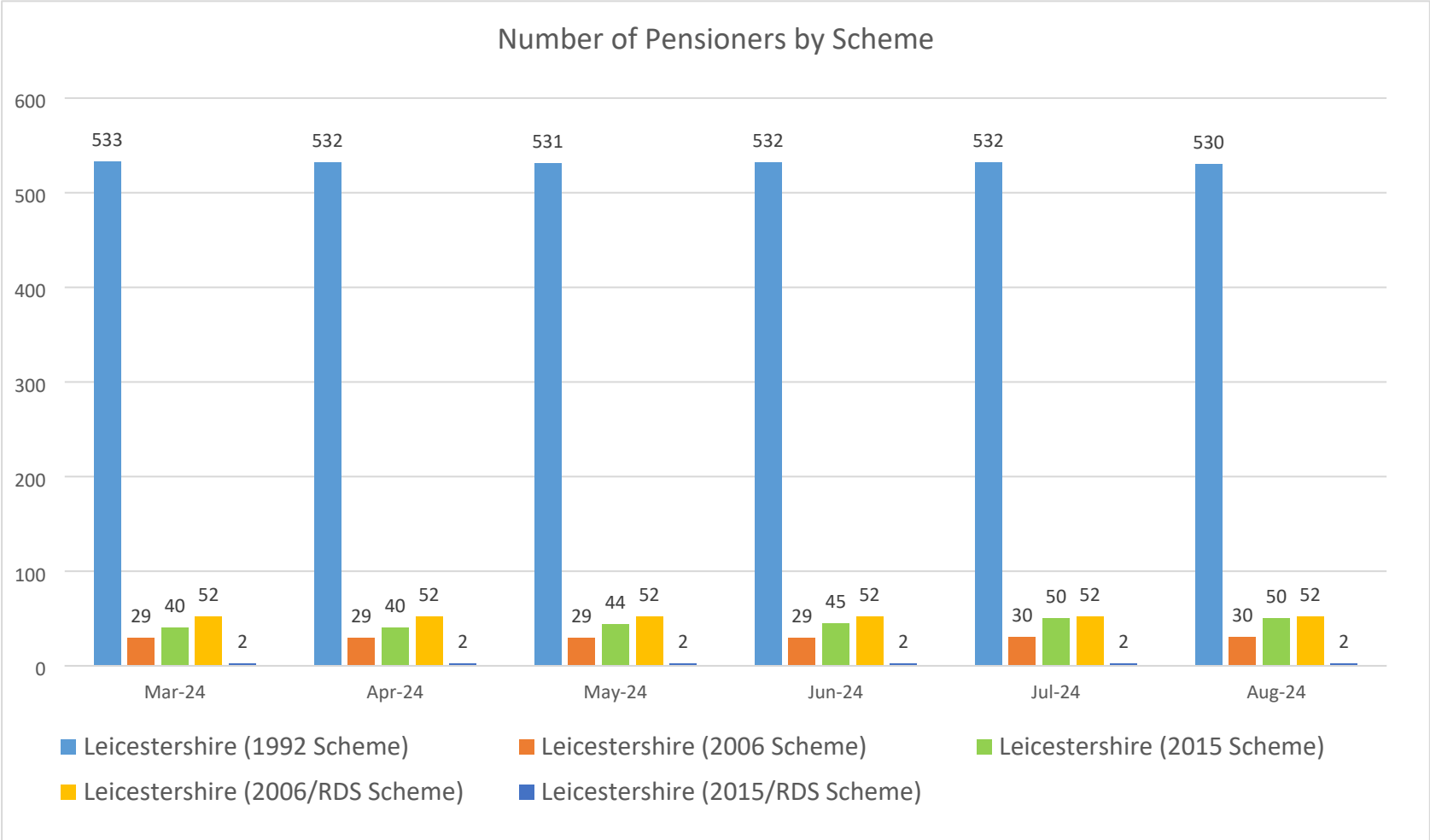
Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Leicestershire (1992 Scheme)	0	33	530	81	1	0
Leicestershire (2006 Scheme)	0	134	30	3	8	0
Leicestershire (2006/RDS Scheme)	0	9	52	2	0	0
Leicestershire (2015 Scheme)	596	191	50	3	1	28
Leicestershire (2015/RDS Scheme)	5	2	2	0	0	0





Number of Deferred Members by Scheme





5. Administration Update

ABS (out of scope)

WYPF have issued 7,119 ABS from a maximum 7,620. That is 99.99% and the last one is being prepared to be issued.

[Bulletin 83](#) contains quite a bit of information about the Pension Commencement Excess Lump Sums (PCELS). FRAs may wish to contact Firefighters of grade Area Manager and above with regards to PCELS.

Finance update

All Fire returns for Month 12 (March 2024) have been posted and ABS production has started for all Fire Authorities.

Currently we are dependent on a few officers who can post Monthly Fire returns so we are looking at training more staff to build resilience in the team and have more resource available. This will help ease pressure on individuals in the finance team, increase productivity during absences, and when officers are busy in meeting other deadlines.

We are also looking at a consistent approach internally in how we engage with key officers in WYPF who need to be informed of all issues we are encountering with Fire Authorities. This will improve awareness and will help the Finance team in engaging with the Fire Authorities in dealing and responding to queries.

6. Communication & Training

The minutes from the last Fire Client meeting which took place on 17 July 2024 will be made available and distributed in the next few days. Below is a quick recap of some the main updates from WYPF :

Retirement Packs

Can we just remind all FRAs that you should not be printing the Retirement Pack from the portal before you have received the notification email. Unfortunately, the pack is available to view before it has been authorised and we have had a few incidents where the member has been supplied incorrect information as the figures have been amended between being produced and being authorised.

Financial Data Extract

WYPF are receiving a high number of financial data extracts that contain a combination of questionable pay and/or contribution information, plus some cells have been left blank. Please can we remind clients that you must determine the correct pay/contributions that would have applied in the remedy period for both the legacy and reformed schemes. WYPF cannot provide this information for you and without it we are unable perform the necessary calculations for the member's options.

Immediate Choice/Deferred Choice Elections

When a member makes a legacy or reformed election which means they are due a refund of pension contributions this refund should be paid to them by the FRA.

As the Fire Schemes are unfunded and pension contributions are not paid over to WYPF yourselves as the FRA need to make this refund.

The refund should be paid as a matter of urgency because of the interest being added

Pension Dashboard

On 17 July TPR joined the client meeting and delivered a short presentation on Pension Dashboards.

The slides have previously been made available to those that attended, however, we thought it would be useful to share with as many colleagues as possible.



WYPF Fire Client
Session - 170724 Slic

Pension boards

- South Yorkshire – 3 July 2024
- Durham & Darlington – 4 July 2024
- Devon & Somerset – 8 July 2024
- Norfolk – 10 July 2024
- Dorset & Wiltshire – 11 July 2024
- Nottinghamshire – 16 July 2024
- Derbyshire – 17 July 2024
- Northamptonshire – 18 July 2024
- North Yorkshire – 26 July 2024

National / regional meetings

- Fire Administrator Forum – 2 July 2024
- Fire Administrator Forum – 16 July 2024
- Fire Client Meeting – 17 July 2024
- North East Region FOG – 24 July 2024
- Fire Administrator Forum – 30 July 2024

7. Member Update

None

8. IT Update

9. Five Year Audit Plan 2023 – 2027

West Yorkshire Pension Fund Five Year Audit Plan 2022 - 2027	Fr q	Last Audit	Rcmn d	Days	23/2 4	24/2 5	25/2 6	26/2 7	27/2 8
Annual Accounts Verification	1	20/09/21	1	50	✓	✓	✓	✓	✓
Audits Per Year					1	1	1	1	1
Local Government Scheme Contributions	2	01/11/21	2	50					
New Pensions and Lump Sums - WYPF									
- Normal and Early Retirements	5	09/10/19	1	25	✓			✓	
- Death in Service, Post Retirement Widow and Dependent Benefits	5	08/10/21	0	25		✓			
- Ill Health Pensions	5	11/07/23	0	25				✓	
- Flexible Retirements	5	30/11/20	2	25	✓				
- Deferred Pensions	5	28/06/22	0	25			✓		
Transfers Out	5	07/10/20	0	20					✓
Transfers In	5	17/05/21	0	20			✓		
Reimbursement of Agency Payments	5	10/03/23	0	20		✓		✓	
Life Existence / Certificates	5	11/08/21	3	20					✓
AVC Arrangements	5	21/12/22	0	20			✓		
Admission of New Bodies	5	07/02/20	0	20					✓
Pensioners Payroll	2.5	17/11/20	0	50		✓			
Purchase of Additional Pension	5	29/03/22	0	20	✓		✓		
Annual Benefits Statements	2.5	30/09/22	0	40				✓	
Fire Service New Pensions and Lump Sums			1						
- Normal and Early Retirements	3	17/12/20	0	33.3		✓			✓
- Ill Health and Death Benefits	3	23/06/22	0	33.3			✓		✓
- Deferred Pensions	3		0	33.3	✓			✓	
Audits Per Year					4	5	5	5	5
UK and Overseas Equities	1	01/02/23	0	75	✓	✓	✓	✓	✓
UK Fixed and Index Linked Public and Corporate Bonds	3	18/08/22	0	25		✓			✓
UK and Overseas Unit Trusts (Property and Other)	3	06/02/23	1	25		✓			✓
Fund of Hedge Funds	5	09/06/16	1	15			✓		
UK and Overseas Private Equities	3	31/03/22	3	25		✓		✓	
Global Bonds	5	11/12/18	0	15	✓				

West Yorkshire Pension Fund Five Year Audit Plan 2022 - 2027	Fr q	Last Audit	Rcmn d	Days	23/2 4	24/2 5	25/2 6	26/2 7	27/2 8
Treasury Management (Short Term Cash Lending)	1	18/12/22	0	75	✓	✓	✓	✓	✓
Stock Lending	5	24/11/21	1	15				✓	
Compliance with IAP Investment Decisions and Policies	5	22/02/21	0	15	✓		✓		
Verification of Assets	5	01/03/21	0	15			✓		
Verification of Assets	5	01/03/21		15	✓				
Listed Alternatives	5	00/01/00		15			✓		
Audits Per Year					5	5	5	4	4
Additional work outside plan									
Transfer of Data to New Pensions System		02/07/12	0						
Monthly Contribution Data Usage		20/08/15	6						
Information Governance Including GDPR		01/05/19	7						
Transfer of Data From Outside Bodies		10/06/19	6						
Pooling Arrangements		20/03/19	1						
Custodial Transfer Arrangements		01/07/20	0						
Accuracy of Contributions Recorded on Member Records		10/02/20	7						
GLIL		30/07/20	1						
Accuracy of Contributions Recorded on Member Records - Follow Up (i)		05/11/21	2						
NLGPS Collaborative Work - Common Custodian Arrangements		30/04/21	1						
Business Continuity		17/01/22	5						
Shared Service Admission		07/04/22	6						
NLGPS Collaborative Work - NPEP		29/06/22	3						
NLGPS Collaborative Work - GLIL Infrastructure		18/04/23			1				1
Exiting Employers		25/04/23			1				1
No of audits					12	11	11	10	12
Audit days over five years				885	177	177	177	177	177
Resourced days				1,225	245	245	245	245	245
Headroom				340	68	68	68	68	68

10. 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

11. 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

12. 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 \(fpsregs.org\)](https://www.fpsregs.org)

Some key issues to highlight:

FPS

Annual Benefit Statements (ABS)

We are pleased to publish the ABS template statements and supporting documents for 2024. These are available under both the [Guides and Sample documents](#) and [Annual Benefit Statement](#) section of the member area of the [FPS regulations and guidance website](#).

Under the 'Current Year' tab you will find three headings:

- ABS inclusive of remedy wording
- ABS CARE and Final Salary (not remedy)
- ABS CARE only

Within each heading you will find a template ABS and the supporting annexes.

By way of reminder, in [FPS Bulletin 81 – May 2024](#) we provided a [factsheet](#) to support scheme managers, that sets out the different statutory deadlines within the age discrimination remedy process. The factsheet covers the scenario where administrators are unable to provide a combined ABS-RSS by 31 August 2024, in which case a 'rolled back' ABS should be provided instead.

Should administrators not be able to meet this deadline, we have created a template [delay letter](#) that can be sent to members.

The Pensions Regulator (TPR) are also keen that you engage with them at an early stage to report breaches.

The TPR single code of practice has a section on '[Reporting to TPR](#)' which covers reporting [breaches of law](#) and [who must report, deciding whether to report](#) and [how](#).

Additionally, the Scheme Advisory Board (SAB) have published a [breach assessment template](#) which can be found in the [resources](#) section of the [FPS Board](#) website. The document is designed to assist stakeholders on assessing whether a breach is materially significant or not.

It is the responsibility of scheme managers, administrators, and Local Pension Boards to ensure that any breaches of law are reported as soon as they have been identified.

ACTION: Scheme managers: should liaise with their administrators to understand the timetable to produce ABS statements if an ABS RSS is not being produced for 2024 and report any breaches should they occur.

Administrators:

- are encouraged to use the template statements, however they can be adapted accordingly to make personal to each FRA.

- are encouraged to use the template delay letter should they not be able to provide a rolled back ABS by 31 August 2024.
- should report any breaches should they occur.

WYPF: Have produced ABS for all “not in scope” members. For “in scope” members a delay letter was distributed in July. For these members we anticipate an ABS/RSS to be provided by 31 December. [paragraph corrected]

Due to this delay WYPF will report a breach to TPR in early September and provide a copy of that communication to each FRA. If an FRA also intends to report a breach, this information can be used in their reporting of a breach.

Local Pension Boards:

are encouraged to ask for information with regards to the ABS production and report any breaches should they occur.

Age Discrimination Remedy – Contingent Decisions

In light of recent legal advice, we have reviewed our Contingent Decision (CD) guidance for both scheme managers and members.

The revised scheme manager guidance can be found in [retrospective remedy section](#) the on the [FPS Regulations and Guidance](#) website, the member guidance is available on the [FPS member](#) website. If you have a case which has been processed using the previous guidance, then please contact the LGA for support with communicating the revised position with the member.

ACTION: Scheme managers: should:

- Ensure that they have read the updated guidance and are signposting members to the revised member guidance.
- Liaise with the LGA over bespoke communicates with any individuals who are affected by this change in position. Administrators: Should ensure that they are aware of the current guidance.

Matthews - GAD calculator

On 12 July 2024, GAD published a revised calculator and updated their guidance.

The calculator fixes some issues that had been identified within the calculator. A summary of the fixes can be found on the [Special members of FPS 2006 – GAD calculator](#) section of the FPS regulations and guidance website.

Calculations that have been run through the previous version of the calculator, will not need to be rerun, this is unless they are affected by fixes referenced above.

FRA's are encouraged not to make local copies of the calculator, but to refer to the [Special members of FPS 2006 – GAD calculator](#) section of the FPS regulations and guidance website.

ACTION: Scheme Managers: should ensure that they are using the most up to date version of the calculator

Pension Savings Statements

As with previous years, Pension Savings Statements (PSS) are due to be sent to members by 6 October 2024. In addition to the 2023-24 PSS, schemes are also required to provide members with a Remediable Pension Savings Statement (RPSS) which covers their revised position for the remedy period following rollback and tax year 2022-23. To support the sector with consistent communications we have provided a template R-PSS statement to use which is available on the [Age Discrimination Remedy – Useful information](#) section of the member area of the [FPS regulations and guidance](#) website.

We understand that not all administrators are on track to comply with the 6 October deadline due to various factors i.e. incorrect/incomplete data and/or software issues. We have

therefore been liaising with HMRC on behalf of the fire sector to understand what mitigations, if any, are available.

With regards to the 2023-24 PSS HMRC have confirmed that there are **no mitigations** available to schemes or members. The expectation from HMRC is that schemes will supply members with their PSS by 6 October 2024, members are then expected to report any Annual Allowance breach to HMRC via the Self-Assessment method no later than 31 January 2025. HMRC have confirmed that late payment fees will be incurred by members should they not comply with the 31 January deadline.

We have alerted HMRC to the prospect that members will not be able to accurately assess or report on their 2023-24 Annual Allowance position until their remedial period has been dealt with. HMRC do acknowledge this to be the case and have suggested that the member submits an estimate by 31 January, the member then has 12 months to revisit this figure and provide HMRC accurate information. HMRC have provided detailed [guidance](#) for members on what to do if they don't know their pension input details until after the Self-Assessment filing date. It is recommended that this is referenced when communicating with affected members.

With regards to the R-PSS, HMRC have confirmed that there **are mitigations available** to members should they not receive all necessary information by 6 October 2024. [Regulation 32 \(3\) of The Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) \(No.2\) Regulations 2023](#) confirm that where a scheme administrator provides a pension savings statement to the specified individual on or after 1 November 2024, the due date for information is the date three months after that statement is provided. It is recommended that a delay letter should be sent to all members whereby schemes are unable to comply with the 6 October deadline, a template R-PSS delay letter can be found on the Age Discrimination Remedy – Useful information section of the member area of the FPS regulations and guidance website.

HMRC have confirmed that the mitigations for delays in providing a R-PSS only stretch to the member. Schemes still are expected to still comply with the 6 October 2024 deadline. Failure to do so may result in schemes being liable to a penalty for failing to provide information on time. Failure to provide information on time covers both non provision and late provision. The penalties that may be due are:

- a penalty of up to £300 for failure to provide the required information on time, and
- where the initial failure to provide penalty has been levied and the information still hasn't been provided further penalties may be due. These penalties can be up to daily penalties of up to £60 for every day that the failure to provide the required information continues.

Further details on penalties can be found in [PTM160800](#).

Action: WYPF are already working on PSs for 2023/24. Due to the issues with ABS/RSS these are manual calculations. However, due to the higher CPI used in revaluation and increased AA threshold, it is expected the number reaching or breaching the limit will be significantly less than those in recent years.

Events

Local Pension Board (LPB) Training Sessions

Further to [FPS Bulletin 77 – January 2024](#) where we launched our new LPB training and the success of our first session which we covered in [FPS Bulletin 79 – March 2024](#).

We are excited to release the dates of the training and the proposed speakers.

- Wednesday 18 September 2024 11:00 – 15:30 (In person - 18 Smith Square) ([bookings live on LGA events page](#))
- Thursday 23 January 2025 10:00 – 14:00 (MS Teams) ([Fully booked](#))

We are also pleased to release our 2025 dates as follows:

- Tuesday 25 March 2025 10:00 – 14:00 (MS Teams) ([Fully booked](#))
- Monday 16 June 2025 13:00 – 17:00 (MS Teams)
- Wednesday 17 September 2025 11:00 – 15:30 (in person – 18 Smith Square)
- Thursday 22 January 2026 10:00 – 14:00 (MS Teams)

Attendees will hear from a range of speakers including:

LGA – to provide an overview of the FPS scheme(s) and current pension related hot topics e.g. Matthews and McCloud

SAB (England) Chair – to give an introduction and overview of the work that SAB are involved in.

Fire LPB Effectiveness Committee Chair – to provide input on LPB effectiveness and what the committee have been working on.

The Pensions Regulator – to provide an update on the Administration and Governance survey and how the results relate to Fire, as well as covering the importance of the Public Sector Pensions toolkit and any current developments e.g. the General Code. The Pensions

Dashboard Programme (PDP)/ The Pensions Regulator (TPR) – to provide an update on the programme and requirements on scheme managers/to provide detail of the tools that scheme managers can use to help them prepare for dashboards e.g. checklists.

To book:

Please email bluelightpensions@local.gov.uk for the MS Teams sessions and we will announce when the booking link goes live for the in-person session at the LGA offices, 18 Smith Square, Westminster, SW1P 3HZ.

ACTION: Readers are asked to make their LPB members aware of the training sessions and encourage them to book onto a session.

Firefighters Pensions AGM – 18 and 19 September 2024

We are pleased to announce that bookings have opened for our AGM.

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, from:

- The Home Office
- The Pensions Regulator
- First Actuarial
- The SAB legal advisor
- The Pension Dashboards Programme

Day one – Wednesday 18 September 2024 16:30 – 18:30

This will follow the Local Pension Board training session and is primarily for Scheme Managers and Local Pension Board members, day one of the conference will provide practical guidance on the role of the scheme manager and will offer the opportunity to network with counterparts in other FRAs.

Following this session there will be a drinks reception on the terrace from 18:45.

Day two – Thursday 19 September 10:00 – 15:30

Day two of the conference provides delegates with an annual update on the Firefighters' Pension Scheme from key stakeholders.

Bookings are open on the LGA Events page:

[Day One](#)

[Day Two](#)

FPS coffee mornings

Our MS Teams coffee mornings are continuing in July 2024. 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.

We will be holding a session on the Matthews exercise on Thursday 8 August at 11:00, and then a summary session on ill health retirements on Tuesday 20 August at the normal time of 10:00.

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

9 July 2024 – [Statutory Deadlines](#)

23 July 2024 – [Contingent Decision update](#)

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

Statutory Instruments

[Firefighters' Pension Schemes \(England\) \(Amendment\) Order 2023](#) [SI2023/986]

Directions Orders

[Public Service Pensions \(Valuations and Employer Cost Cap\) Directions 2023](#)

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](#)

Pensions Dashboards

[TPR guidance and checklist](#)

[DWP guidance on connection](#)

[PASA connection readiness guidance](#)

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Appendix B – Firefighters’ Pension Scheme Risk Register (updated 19-08-24)

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
1	Failure to administer the scheme in line with regulations and policies	Regulatory	Administration failure	<p>Up to date knowledge through various sources such as SAB, LGA, Home Office.</p> <p>Up to date training.</p> <p>Attendance at regional and national groups.</p> <p>Access to the Regional Adviser.</p> <p>Information on the WYPF website.</p>	1	4	M	TACT				1	4	M	TACT

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
2	Those charged with governance of the Scheme are unable to fulfil their responsibilities effectively.	Regulatory	Reputation	Board members receive briefings, training and informative reports.	2	2	M	OPS	Possible creation of an East Midlands Joint Pension Board.	Scheme Manager	No date available. Updated approval from each scheme would be sought, then requires Government approval.	1	2	L	OPS

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
3	Policies not being in place and up to date	Regulatory		Policies to be reviewed and updated	3	3	H	TACT	A review of all policies by the Scheme Manager and HR.	Scheme Manager	On-going – is a significant task	2	2	M	OPS

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
4	Failure to recognise/manage conflicts of interest at Pension Board	People		Declarations of interests at the beginning of each meeting.	1	2	L	OPS				1	2	L	OPS

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
5	Potential for fraudulent activity by staff and/or scheme members	People	Illegal expenditure, excessive pension benefits	<p>Clear roles and responsibilities for those administering pensions.</p> <p>Duties split between Finance, HR, Warwickshire County Council payroll and WYPF.</p> <p>National Fraud Initiative participation.</p> <p>Review of declarations of interest policy.</p> <p>Internal audit of pensions (CFA and WYPF).</p>	1	3	M	TACT				1	3	M	TACT

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
6	Changes to the Firefighters' Pension Scheme and associated regulations; and lack of expertise in the revised/new provisions.	Business process	Breach of regulation	<p>Advisors provide relevant information and recommendations on particular areas.</p> <p>Professional Administrator engaged, has many fire clients (WYPF).</p> <p>Regional Adviser engaged.</p> <p>Senior officers and Scheme Manager linked in with LGA, NFCC.</p>	1	3	M	TACT				1	3	M	TACT

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
7	Failure to provide adequate information to the Pension Board.	Regulatory	Breach of regulation	<p>Board meetings held at which key information relating to the administration is provided.</p> <p>Extraordinary meetings can be arranged for urgent items.</p> <p>Board can access training by the LGA.</p>	1	2	L	OPS				1	2	L	OPS

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
8	Failure to include all required information in documents issued to scheme members under disclosure regulations.	Regulatory	Breach of regulation	Officers keep up to date with disclosure regulations and distribute knowledge to teams accordingly via relevant websites, seminars and working groups. WYPF is administrator, with many fire clients and issues most documents to individual members.	1	4	M	TACT				1	4	M	TACT

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
9	Failure to communicate adequately with scheme members	People	Negative impact on staff. Breach of regulation.	<p>Websites regularly updated.</p> <p>Newsletters published.</p> <p>Annual Benefit Statements produced and distributed.</p> <p>Updates on key scheme changes – focussed communications where specific groups impacted.</p> <p>WYPF engaged as administrator.</p> <p>Regional Pensions Advisor engaged.</p>	2	3	M	TACT	<p>Pension roadshows, inviting all 3 FRAs' employees.</p> <p>(last held online 13 November 2023, with recordings available)</p>	Scheme Manager	On-going	1	3	M	OPS

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
10	Records are not accurate or do not reflect changes in circumstances.	People	Business process	<p>Records are supported by appropriate documentation.</p> <p>Input and output and audit checks are undertaken.</p> <p>Regular reviews of data quality.</p> <p>Check and challenge between LFRS finance and HR, Warwickshire CC and WYPF.</p>	1	4	M	TACT				1	4	M	TACT

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
11	Impact of the Sargeant / McCloud judgements - Age Discrimination Remedy. Impact of the 'Matthews' On-call second options exercise. Ensuring compliance with Regulations in force effective from 1 October 2023, with an 18-month implementation period to 31 March 2025.	People	Breach of regulation, ET decisions and agreements. Negative impact on operational staff morale. LFRS subject to legal proceedings. LFRS incurs costs on 'early' remedy payments, such as irrecoverable tax charges. Insufficient trained and experienced HR and Finance staff, and systems, to collect the necessary data and process calculations.	Regional working with Notts/Derbys and Regional Pensions Adviser. Work with the LGA, NFCC and WYPF. Reference court judgements, legislation, Government guidance and sector agreements. Regular reports to the CFA and LPB, including risk analysis. Two finance staff allocated; overtime worked. Tracing service to assist contacting former on-call personnel (March 2024)	3	3	H	STRA	On-going review of staff and systems capacity to undertake the necessary remedies, across LFRS, WYPF and Warwickshire CC. Breaches of regulations reported to LPB and where material to the Regulator. Local Pensions Board kept updated.	CFO and Scheme Manager	On-going	2	3	M	STRA

12	Failure to meet timelines and data requirements for the new national Pensions Dashboard	People	Business process	<p>WYPF is the lead, as administrator.</p> <p>WYPF linked in with national developments – regulations, systems, data requirements, etc.</p> <p>National timelines delayed – a connection deadline of 31 October 2026, with FRAs expected to connect by 31 Oct 2025.</p> <p>May be of limited value for many FPS members, who only have the FPS pension.</p>	1	3	M	TACT		On-going, to October 2026.	1	3	M	TACT
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PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
13	Reputational impact of delayed payments arising from the national Injury to Feelings claim.	People	Business Processes	Home Office taking the lead on making agreed payments and considering further claims. Communication in response to any queries from staff.	2	3	M	STRA				2	3	M	STRA

ASSESSMENTS REMOVED OR ARCHIVED DURING THE CURRENT YEAR

CRR REF	HAZARD STATEMENT	FINAL RISK ASSESSMENT SCORE				REASON FOR REMOVAL	WHEN REMOVED
		L	I	R	ML		

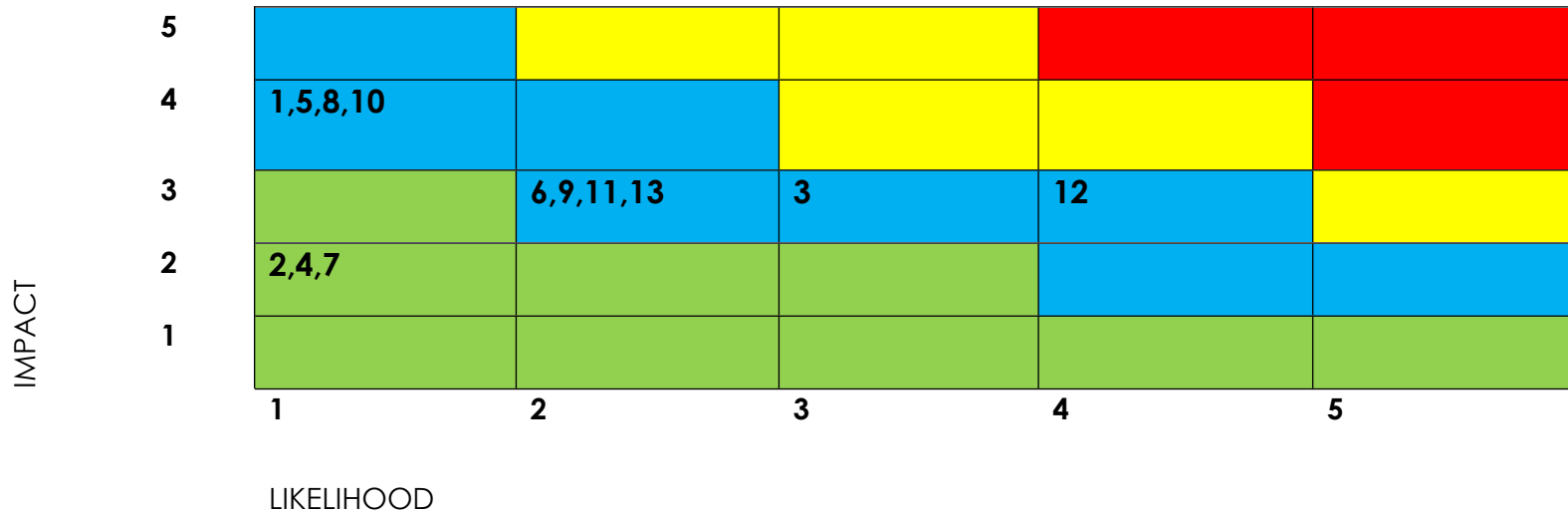
Appendix 2

Risk Assessment Matrix



VERY HIGH	High level risk with the potential to cause catastrophic damage to the reputation, finances or governance of the Service
HIGH	Mid-high level risk possibly requiring significant amendment to policy/procedure and significant financial outlay
MEDIUM	Low –mid level risk possibly requiring new policy and/or some financial outlay
LOW	Low level risk capable of being managed within normal service policy and procedure

Risk Management Matrix



CORPORATE	Those risks likely to require management oversight by the CFA and/or SMT
STRATEGIC	Those risks likely to require management oversight by SMT
TACTICAL	Those risks likely to require management oversight by the HSW&CRM Committee and sub-groups, Group Managers' Team (GMT)and/or individual Directors
OPERATIONAL	Those risks likely to require management oversight by individual Group and Station Managers and/or GMT

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