**LOCAL PENSION BOARD**

**Report of the Pensions Administrator / Manager**

**12 October 2020**

**PENSIONS UPDATE**

1. **Purpose of Report**

1.1 To provide Members with information on scheme membership and scheme changes as well as training, governance and communication issues.

**2.0 Introduction**

2.1 This report provides Members with scheme information, together with updates on current issues and training.

**3.0 Scheme Membership Information**

3.1 The following active memberships of the firefighters’ pension schemes are taken from pay data as at 25 September 2020 (for Wholetime Firefighters) and 14 August 2020 (for On-Call Firefighters), and compared with active membership as at 5 June 2020 (for Wholetime Firefighters) and 15 June 2020 (for On-Call Firefighters).

3.1.1

|  |  |
| --- | --- |
| **Firefighters’ Pension Schemes Membership** | **Wholetime** |
| **25/09/2020** | **05/06/2020** |
| 1992 | 35 | 41 |
| 2006 | 2 | 2 |
| 2015 | 251 | 257 |
| Retained Modified | 3 | 5 |
| Opted Out | 11 (3.63%) | 12 (3.79%) |

3.1.2 The variations for wholetime membership are as follows:

* **1992 scheme** 6 retirements
* **2006 scheme** no movement
* **2015 scheme** 1 starter (WT recruitment, on-call staff on temporary WT or

OSR posts)

2 members transitioned from the retained modified scheme

8 leavers

1 death in service

* **Retained modified** 2 members transitioned to the 2015 scheme

**scheme**

* **Opt Outs** No members have opted out of the 2015 Scheme since the

24 June 2020 Board meeting.

3.2

|  |  |
| --- | --- |
| **Firefighters’ Pension Schemes Membership** | **On-Call** |
| **14/08/2020** | **15/06/2020** |
| 1992 | 0 | 0 |
| 2006 | 5 | 5 |
| 2015 | 300 | 302 |
| Retained Modified | 11 | 13 |
| Opted Out | 13 (3.60%) | 14 (3.83%) |

* + 1. The variations for On-Call membership are as follows:
* **2006 scheme** 1 member transitioned to the 2015 scheme

1 member moved from retained modified section to the standard 2006 section as they should never have been recorded as a member of the modified scheme

* **2015 scheme** 5 starters (new employees)

9 leavers

1 member transitioned from the 2006 scheme

1 member transitioned from the retained modified scheme

* **Retained modified** 1 member transitioned to the 2015 scheme

**Scheme** 1 member moved from retained modified section to the standard 2006 section as they should never have been recorded as a member of the modified scheme

* **Opt Outs** No members have opted out of the 2015 Scheme since the

24 June 2020 Board meeting.

3.3 The following table shows the retired members according to each scheme as at 15 September 2020 compared to 12 June 2020. Membership continues to be split between pensioners and dependants.

3.3.1

|  |  |  |
| --- | --- | --- |
| **Firefighters’ Pensions Schemes Retired Membership** | **15/09/2020** | **12/06/2020** |
| 1992 (Pensioners) | 442 | 437 |
| 1992 (Dependants – widow / partner / child pension) | 84 | 86 |
| 2006 | 19 | 19 |
| 2006 (Dependants – widow / partner / child pension) | 1 | 2 \* |
| 2015 | 10 | 10 |
| 2015 (Dependants – widow / partner / child pension) | 3 | 2 |
| Retained Modified | 51 | 51 |
| Retained Modified (Dependants – widow / partner / child pension) | 2 | 0 \* |

3.3.2 The variations for members with a pensioner status are as follows:

* **1992 scheme** 6retirement from active status implemented

2 deaths of pensioners

* **2006 scheme** no movement (but see the note below)
* **2015 scheme** 1 death from active status implemented
* **Retained modified** 1 death from active status implemented (but see the note below)

**scheme**

\* The dependants pensions in payment for the 2006 scheme (both the standard and the retained modified sections) were incorrectly recorded previously. West Yorkshire Pension Fund (WYPF) have advised that they should have previously quoted 1 beneficiary pension in payment in the standard 2006 scheme (which remains at 1) and 1 beneficiary pension in payment in the retained modified section (now 2).

3.4 The following table shows the deferred members of each scheme as at 15 September 2020, compared to those as at 12 June 2020.

3.4.1

|  |  |  |
| --- | --- | --- |
| **Firefighters’ Pensions Schemes Deferred Membership** | **15/09/2020** | **12/06/2020** |
| 1992 | 28 | 31 |
| 2006 | 147 | 147 |
| RDS Modified | 27 | 28 |
| 2015 | 181 | 176 |

3.4.2 The variations in deferred pension members cover pensions that have come into payment, leavers and those who have opted out of the scheme (who don’t qualify for a refund of their contributions).

**4.0 Internal Dispute Resolution Procedure (IDRP)**

4.1 There is an Internal Dispute Resolution Procedure for dealing with any complaints. Initial information on this two-stage process can be found at:

<http://www.wypf.org.uk/Member/Fire/IDRP/InternalDisputeResolutionPro.aspx>

There have been no new IDRP applications since previous meeting, and it has been confirmed that the case recorded as an IDRP at the previous meeting should not be regarded as such due to it relating to matter where legal proceedings had already commenced (i.e. the application of ‘remedy’).

**5.0 Pension Board Training Update**

5.1 Additional training scheduled for Board members:

* LGAs annual Pension Board wrap-up training arranged to be held remotely on two separate dates: 10 June and 8 July 2020. Volunteers were sought 1 June, with the outcome being:
  + Pensions Administrator/Manager attended 10 June session (slide deck to be provided)
  + Board member SH has volunteered to attend the 8 July session
* Firefighters’ Pensions AGM – 22-23 September 2020. DH booked onto the session
* Board members have been contacted about their online learning. It was decided in March 2019 that the learning, hosted by the Pensions Regulator, would be revisited every two years. The Pensions Administrator/Manager has forwarded the link to those members who already need to revisit the learning and will contact all Board members when the expiry date is approaching.
* LGAs annual Pension Board training was arranged for the 19 October 2020 Board meeting; this has been deferred to the 16 December 2020 meeting (as more may be known on the outcome of the ‘remedy’ consultation).

West Yorkshire Pension Fund (WYPF) will be delivering an overview of ‘remedy’, including ‘immediate detriment’ as part of their report as Pension Provider.

1. **Other Work Items**
   1. All monthly postings for the 2019/20 year were submitted to WYPF in sufficient time to allow Annual Benefit Statements and, more recently, Pension Savings Statements to be issued before their respective statutory deadline dates. WYPF reported that 100% of Annual Benefit Statements, for all schems, were issued on behalf of North Yorkshire Fire and Rescue Service.
   2. Monthly postings up to and including August have been submitted in respect of the 2020/21 year. Extra refinements to this process have been introduced to such an extent that the Pensions Administrator/Manager has signed off on this project with North Yorkshire County Council.
   3. The pre-retirement seminar took place on 1 September at Harrogate station, following a thorough risk assessment of the venue. The event was co-ordinated well by True Bearing and it received some very positive feedback from delegates.

6.4 On 16 July HM Treasury (HMT) published their consultation containing proposals to remedy the majority of public sector pension schemes, in line with the result of the McCloud/Sergeant judgement.  The consultation closed on 11 October.

The Pensions Administrator/Manager emailed the workforce on 5 August with a brief overview of the main points, along with links to the consultation itself, the questions being asked, and the consultation FAQ document.

On 24 September, the National Fire Chiefs Council (NFCC) invited comments from fire and rescue services to the consultation response that it had drafted. The Pensions Administrator/Manager co-ordinated a response, on behalf of the OPFCC, back to the NFCC.

The points that featured in the response back to the NFCC were also used in a separate submission on behalf North Yorkshire Fire and Rescue Service following consultation with the OPFCC.

* 1. During August and early September, the Pensions Administrator/Manager assisted the Head of Finance with the submission of North Yorkshire Fire and Rescue Service’s pension income / expenditure forecasts for the period  2020/21 to 2025/26.

This work is needed to ensure the Service receives accurate top up grant payments from the Home Office, and is paid into the pension fund where contributions from members and the Service are insufficient to fund the pension payments.

The Pensions Administrator/Manager predicted the active members who were expected to retire up to March 2026, and what their predicted lump sums and annual pension payments would be (based on their current annual benefit statement – i.e. current scheme regulations – due to the outcome of remedy not being known). The benefits of former contributing members (deferred members), that were also due to come into payment up to March 2026, were also included in the exercise.

* 1. At the request of the OPFCC the Pensions Administrator/Manager created the North Yorkshire Fire and Rescue Service pension board area of the site.  The content mirrors the layout of the former site, and can be found at: <https://www.northyorkshire-pfcc.gov.uk/fire-oversight/governance/local-pension-board-fire/>
  2. Since the previous meeting, a new Member representative has joined the Board: welcome James. Attempts to fill the substitute member vacancy, however, proved unsuccessful.
  3. The Firefighters’ Pension Scheme Discretions policy that was ratified during December 2019 is still progessing, and is currently with the FBU for final comments / sign-off.

These now reflect those discretions that are, in reality, delegated to WYPF as part of the day-to-day administration.

Once fully-endorsed, they will be finally adopted by the OFPCC and published. Future Board meetings will confirm where a discretion has been exercised by the Pensions Administrator / Manager since the previous meeting

1. **Discretions made by Scheme Manager**

7.1 The Scheme Manager is responsible for the operation of the scheme, and the Police, Fire and Crime Commissioner is regarded as the Scheme Manager. However, this duty has been delegated to the Pensions Administrator / Manager.

7.2 For the period 1 June to 30 September 2020, the Scheme Manager has exercised their discretion on one occasion.

7.3 Following the death of an active scheme member (who had membership of FPS 2015 for their wholetime duties and the retained modified section of FPS 2006 for their on-call duties), a decision as to the recipient(s) of the death grant needed to be made.

7.4 The regulations for each scheme state:

7.4.1 in the case of the 2006 scheme:

(10) Subject to paragraph (11), the death grant may be paid, in whole or in part, to such person or persons as the authority think fit.

(11) The authority must not pay any part of a death grant to a person who is convicted of the murder or manslaughter of the deceased, but this is subject to paragraph (12).

7.4.2 in the case of the 2015 scheme:

95.  The scheme manager may, at its absolute discretion, pay any lump sum death benefit payable under this Chapter to or for the benefit of the member’s nominee, personal representatives or any person appearing to the scheme manager to have been a relative or dependent of the member.

7.5 Although the deceased had completed a death grant nomination form for each scheme, naming his cohabiting partner as sole beneficiary, the Scheme Manager accounted for the wishes of the partner, and agreed to divide the death grant into equal amounts in respect of the partner and the deceased’s two sons.

1. **Legislative update**

|  |  |
| --- | --- |
| **SI** | **Reference title** |
| 2020/630 | The Occupational and Personal Pension Schemes (Automatic Enrolment)(Amendment) Regulations 2020 |
| 2020/893 | The Local Government Pension Scheme (Amendment) (No. 2) Regulations 2020 |

1. **Firefighters’ Pension Schemes Bulletins Summary**

**FPS England – 2020 valuation final data specifications**

The Government Actuary’s Department’s (GAD) final 2020 valuation data  
specifications for the Fire England schemes were issued by email to administrators  
and software suppliers on 3 June 2020. The document has also been uploaded to  
the dedicated valuations webpage in the password-protected area of the FPS  
Regulations and Guidance website.

The specifications are largely identical to the draft issued at the end of 2019. The  
one change is to clarify which members require the additional Sargeant data.  
GAD are still working on the data collection spreadsheet and instructions which  
should be issued in the near future.

The deadline for submission of data remains 31 December 2020 as confirmed in  
FPS Bulletin 32 – April 2020.

**Protected Pension Age - HMT extension**

As previously confirmed in written statement HCWS196, the Protected Pension Age  
(PPA) tax rules were temporarily relaxed for the period 1 March to 1 June 2020 for  
those returning to work as a result of COVID-19.

On 2 June 2020 HM Treasury/HMRC announced an extension to the easement of  
the tax rules relating to PPA. The deadline has been extended to 1 November 2020  
for retired firefighters re-employed in relation to FRAs' response to the coronavirus  
pandemic.

Please see the announcement in the amended HMRC pension schemes newsletter  
119 - April 2020, under heading 1.a.

HMT have confirmed that the effect of the statement is that anyone re-employed  
between 1 March and the deadline would be deemed as having satisfied the reemployment conditions, regardless of how long the employment lasted.

New Clause 20: Protected pension age of members employed as a result of  
coronavirus has been inserted at Report Stage of the Finance Bill 2020 and  
introduces a new re-employment condition to paragraph 22(7F) of Schedule 36 to  
the Finance Act 2004.

HMRC have published a tax information and impact note which explains more about  
these changes.

We recommend that the reasons for re-employment being COVID-19 related are  
clearly documented and shared with your Local Pension Board.

**ABS 2020 – member communications**

As detailed in FPS Bulletin 32 – April 2020, it will not be possible to include  
projections on the Annual Benefit Statements (ABS) this year which reflect the  
outcome of the Sargeant legal judgment.

This is because:

a) the ongoing discussions on remedy are still confidential pending release of the  
consultation, and

b) the software companies have confirmed that it will take at least 12 months to  
programme the software.

We have recommended that members are provided with a projection based on  
current regulations up to their normal pension age and that the caveat provided by  
HMT is included on the statement.

With both the remedy consultation and final Employment Tribunal hearing expected  
in July, member expectations may understandably be heightened. We appreciate the  
need to manage those expectations ahead of the ABS being released, so there is a  
clear understanding of why the statements do not reflect the outcome of the legal  
decision.

**Raising tax awareness through job advertisements**

As thresholds for the annual and lifetime allowances have decreased, there is an  
increasing likelihood of members breaching tax limits by accepting a promotion or  
change of position which attracts pensionable allowances.

The importance of communicating potential tax issues to members has been a topic  
of regular discussion for the SAB and is supported by recent Pension Ombudsman  
determinations. Following a recent meeting of the Fire Communications Working  
Group (FCWG) we are pleased to provide the following standard wording to be  
included within job adverts.

Our thanks go to colleagues at West Yorkshire Fire and Rescue Service for supplying the suggested wording:

**Pension Considerations**

**Annual Allowance**

*Please note that it is your personal responsibility to check whether by  
applying/accepting this position it would result in any Annual Allowance implications.  
A breach in the Annual Allowance threshold could result in a Tax charge. Further  
information on Annual Allowance can be obtained from our Pensions team.*

**Lifetime Allowance**

*Please note that it is your personal responsibility to check whether by  
applying/accepting this position it would result in any Lifetime Allowance implications.  
A breach in the Lifetime Allowance threshold will result in a Tax charge. Further  
information on Lifetime Allowance can be obtained from our Pensions team.*

**IQMP patient confidentiality and the pension scheme rules**

We have previously been asked for guidance with regard to IQMPs providing the  
medical report directly to the member to request consent for the information to be  
shared with the FRA.

We have been provided with a copy of this clarification from GMC on the sharing of  
confidential reports. While the report specifically refers to the Police Pension  
Scheme, we can advise that this would also cover the FPS. In brief the message is  
that:

• An IQMP is not required to provide a copy of their report to the applicant, this  
should be submitted to the FRA who must supply a copy of the opinion to the  
member within 14 days of the determination

• The applicant is not able to prevent the report’s release to the FRA if they  
disagree with its contents or the IQMP’s opinion. Once the examination has  
taken place, the IQMP is required by law to report their opinion to the FRA,  
and if the subject is dissatisfied with the report, they have the opportunity to  
appeal.

**Sargeant remedy consultation published**

On 16 July 2020, HM Treasury (HMT) published their consultation on proposals to  
remove age discrimination from the unfunded public service pension schemes in line  
with the result of the McCloud/Sargeant case, together with an update on the  
employer cost cap process. These were accompanied by a statement from the Chief  
Secretary to the Treasury.

The consultation relates to members of the unfunded public service schemes  
including Fire, Teachers and Police. A separate consultation on remedying age  
discrimination within the Local Government Pension Scheme (LGPS) (amending the  
statutory underpin) was issued on the same date by the Ministry of Housing,  
Communities & Local Government (MHCLG).

We will be issuing further commentary on the consultation once we have had an  
opportunity to review, however the major proposals by HMT are that:

• Protections will be extended to cover all unfunded scheme members who  
were in active scheme membership on 31 March 2012 and have membership  
in the reformed schemes (without a 5-year break) regardless of whether they  
have made a claim to a tribunal on this matter

• Protection will take the form of the right to membership of the relevant  
unfunded final salary scheme during the protected period which runs from 1  
April 2015 to 31 March 2022

• Protection will be backdated for qualifying members even if they have left the  
scheme since the start of the protected period

• Accrual in all unfunded final salary schemes for existing and new protected  
members will cease at the end of the protected period 31 March 2022

• Protected members will be given the opportunity to elect for benefits accrued  
during the protected period to be calculated on a CARE basis as an  
alternative to protected final salary benefits

• There are two proposals for when the election is to be made – immediate  
(soon after the proposals are in force) or deferred (when the member takes  
their benefits)

The employer cost cap process, applicable to all public service pension schemes  
including the FPS is currently paused and will now be restarted. We understand that  
HMT’s objective would be to complete the process by next year, taking into account  
the cost of the proposals to remedy age discrimination as set out in the consultation.

**SAB levy 2020-21**

Under arrangements for the Firefighters’ Pension Scheme 2014 regulations 4H(1),  
the Scheme Advisory Board are required to set an annual budget for approval by the  
Secretary of State.

We are currently awaiting approval of the 2020-21 budget by the minister and expect  
that we will start the collection process in August/ September. 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.

**Equalisation of male survivor benefits in public service pension schemes**

The Chief Secretary to the Treasury has made written statement HCWS397 on  
public service pensions: survivor benefits for opposite–sex widowers and surviving  
male civil partners.

The statement was in relation to a Teachers' Pension Scheme Employment Tribunal  
case where "male survivors of female scheme members remain entitled to a lower  
survivor benefit than a comparable same-sex survivor" and confirmed that  
"government believes that this difference in treatment will also need to be remedied  
in those other public service pension schemes, where the husband or male civil  
partner of a female scheme member is in similar circumstances".

Part C of the FPS 1992 regulations, Awards on Death – Spouses, does not  
differentiate between a male or female survivor. The definition of a surviving spouse  
is given as a widow or widower. Therefore, the benefits from the scheme are already  
equalised and we do not consider that any amendments to Part C are needed.

**Government response to the consultation on restriction of exit payments in the public sector**

The government has now published its response to the consultation on restricting  
exit payments in the public sector, often referred to as the £95k cap. A reminder of  
what the cap means for the Firefighters' Pension Schemes (FPS) is available in  
our technical note.

The SAB response to the consultation welcomed the exemptions applied for the  
Firefighters' schemes but noted that in some limited circumstances of authority  
initiated early retirement, the cap would still apply and that changes to the FPS and  
related statutory GAD guidance would be necessary in order to comply with the cap.  
We will take this forward with the Home Office.

**Home Office collection of FPS forecasts for 2019-20 to 2025-26**

On 3 August 2020 the Home Office emailed all FRAs in England to request  
submission of their pension income/expenditure forecasts for the period 2019-20 to  
2025-26.

The deadline for submissions is Wednesday 9 September 2020.

FRAs are also required to complete the Excel table at Appendix 2 in order to declare  
the local assumptions that they have applied to calculate their pension estimates.  
The prescribed assumptions that FRAs should use for CPI percentage increases,  
pay increases and employer contribution rates for the forecasting period have  
already been pre-populated on the table. Please note that payment of the 2021 Top  
Up grant will be conditional on its completion and incomplete tables will be returned  
to FRAs.

**Home Office immediate detriment note update**

We commented in FPS Bulletin 36 – August 2020 on the immediate detriment note  
issued by the Home Office. We understand that the department will not be able to  
provide a response to the queries we have raised until October. However, in the  
meantime, we appreciate that FRAs are being encouraged to progress cases under  
the terms of the note.

We are working on providing further clarity to FRAs in three areas.

1. Legal status of the note. We are seeking legal advice on behalf of FRAs including application to claimants and non-claimants, any consequences arising from incorrect payment of benefits, and any resulting unintended discriminatory treatment.

We understand that the Home Office and HMT are relying on Section 61 of the  
Equality Act to provide legal underpinning to the note for non-claimants. That power  
is currently being contested in the FRA’s appeal under Schedule 22 of the same act,  
in which they argue that they were required by law to follow the pension regulations  
and so had no choice but to implement the transitional protections for older  
firefighters.

2. A general information note on the key issues.We have drafted a note to provide additional information to FRAs on the keyconsiderations of implementing the Home Office informal guidance.

This includes the legal considerations detailed above, the position of employer  
contributions, which we believe Home Office to be discussing with HMT, technical  
queries raised, and areas where we believe a policy steer would be helpful to enable  
more accurate payments to be made.

3. Support for practitioners, to include:

3.1. Supporting FRAs to evidence robust decision making on whether a case  
can proceed under the current guidance, and if not, why not;

3.2. Working with the Fire Communications Working Group to provide a  
consistent template on how a member may be provided with a choice and  
what this should include, using documentation provided to support choice  
in 2006 as a guide;

3.3. Working with administrators to provide example calculations to assist with  
bringing benefits into payment where the guidance is not explicit.  
The information note is currently being reviewed and will be issued as soon as  
possible.

**Immediate detriment request for information**

The SAB note the immediate detriment guidance issued by the Home Office and  
wish to encourage the payment of pensions to eligible members.  
The SAB also want to understand what percentage of the FPS 2015 membership  
within the immediate detriment category are likely to be affected by complicating  
factors, such as divorce or transfers.

The Board are seeking information similar to that requested in FPS Bulletin 28 -  
January 2020 on the number of members who are likely to become eligible for  
immediate detriment between now and 31 March 2022. This should include:

• Any member refused ill-health retirement under the FPS 2015 as the lower illhealth criteria was not met.

• 1992 transition members of FPS 2015 who reach age 55 before 31 March  
2022.  
• 1992 transition members of FPS 2015 who reach 30 years’ service before 31  
March 2022.• 1992 transition members of FPS 2015 who will have 25 years+ service and be  
over 50 by 31 March 2022.

The Board request that you complete the information sheet at Appendix 2 by 31  
October 2020. Please note that clicking the link downloads an Excel spreadsheet.

**Medical Appeal Boards - service update**

You may have been aware that Duradiamond, the current contracted provider of  
medical appeals, temporarily suspended appeal hearings for three months from the  
end of March.

We have recently been notified of an email sent from Duradiamond on **7 July  
2020** to confirm the following:

"We are pleased to advise that Duradiamond Healthcare is recommencing the  
organisation and holding of Police and Fire Medical Appeal Board Hearings from this  
week onwards.

The service will be running in a slightly amended format to begin with to reduce  
infection risk to board members and the participating parties. Therefore, initial  
hearings will be held in London in a COVID-19 safe manner. However, we will be in  
touch with all Authorities who have cases lodged with us to discuss arrangements  
and attendance in further detail.

In the meantime, please do send any pending cases in to Duradiamond Healthcare  
and we will acknowledge and process accordingly."

**New Chair of the FPS (England) Scheme Advisory Board**

We are delighted to confirm that the new Chair of the Firefighters’ Pension Scheme  
Advisory Board (SAB) of England has been appointed.

Joanne Livingstone begins her four-year appointment as Chair on 17 August 2020.

Joanne has extensive experience relating to pensions across the  
public and private sectors. She is an Adviser to the Judicial Pensions Committee; she also serves as the Chair of Trustees for the Liberty Europe Pension Scheme and is a Practitioner member of the Actuarial Council among other roles.

**SAB informal response to initial HMT remedy thinking**

The HMT consultation on age discrimination references at paragraph 1.21 the  
informal technical discussions held with scheme administrators and employer and  
member representatives earlier this year. The Firefighters' Pensions (England)  
Scheme Advisory Board has now published its informal response dated 2 April 2020  
to those technical discussions.

Within the response the Board highlighted the following points:

• The lack of information available to them in order to fully assess the impact of  
the proposals, including at that time no mention of post remedy plans

• The considerable challenge administrating the remedy would present to locally administered unfunded schemes

• Concern that a default to the final salary scheme, may not be appropriate for some members in the FPS 2006

• An immediate need for guidance on processing immediate cases.

The Board will submit a full response to the formal consultation by the deadline of 11 October 2020.  
  
**COVID-19 FPS governance survey update**

To measure the impact of the coronavirus pandemic on FPS governance, the  
Bluelight team surveyed FRAs during June and July. During that time responses  
were received from 26 of the 48 Fire and Rescue Authorities (FRAs) in England and  
Wales, equating to an overall response rate of approximately 54%.

Almost all respondents confirmed that they have held or are planning to hold virtual  
Local Pension Board (LPB) meetings, with MS Teams being the preferred method.  
We were pleased to note that two-thirds said they had not experienced any issues  
with meeting online, although a quarter cited technical difficulties.

In all cases, communication with scheme managers, administrators, and scheme  
members had not been affected, with just one reported instance of the current  
situation impacting on communication with the LPB.

Eight in ten respondents did not expect costs in relation to pensions to increase due  
to COVID-19, and two authorities noted that costs had decreased due to savings on  
travel expenses for LPB members.

There did not appear to be a high level of concern about any of the following due to  
changes in working practices: third-party providers e.g. administration, systems,  
consultants, advisers; potential increase of breaches of law; increased risk of cyber  
security issues or scams.

Almost 90% of FRAs responding confirmed that their pensions risk register had been  
amended or there were plans to do so. New risks identified related to business  
continuity arrangements for administration, potential difficulty in recruitment, and lack  
of occupational health provision including the suspension of medical appeal boards.  
Based on the responses that were received, it is clear that FRAs have taken steps to  
mitigate any challenges arising from the current situation and are embracing online  
technology to fulfil their governance responsibilities.

The full report will be issued to the SAB to note at their meeting on 17 September.  
 **Government confirms intention to increase minimum pension age**

In an answer to a parliamentary question on 3 September 2020, the Government  
confirmed that it still plans to increase the minimum pension age from 55 to 57 in  
2028 and will legislate in due course.

The Government confirmed in 2014 in its response to the consultation ‘Freedom and  
choice in pensions’ that it intends to increase the minimum age from 55 to 57 in 2028  
and that the change will apply to all schemes, aside from those in the public sector  
that do not link their normal pension age to State Pension age, namely Firefighters,  
Police and the Armed Forces.

**The Pensions Regulator (TPR) scheme return 2019-20**

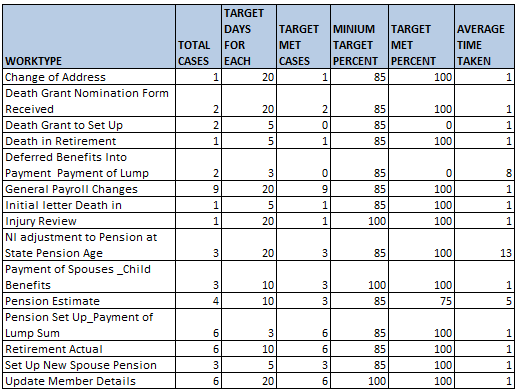
The statutory TPR scheme return is scheduled to be released in Autumn in line with  
their usual timescales. A warm- up email will be issued to scheme manager contacts  
in the coming weeks.

Information about completing and submitting a public service scheme return can be  
found on the TPR website. Schemes are advised to make sure that their contact  
details are up to date on the Exchange system.

For the first time in 2018, TPR asked schemes to measure the data they hold about  
their members and report this on the annual scheme return. In 2019 the LGA  
Bluelight team issued updated guidance on data scoring and a data score weighting  
template to allow schemes to assess the likely accuracy of their data and adjust the  
score accordingly.

**10.0 West Yorkshire Pension Fund Key Performance Indicators**

10.1 WYPF provides monthly reporting on administration matters and Key Performance Indicators (KPI). The latest KPI results are shown below.



**11.0 Recommendations**

11.1 That Members note the content of the report.

**David Hood**

Pensions Administrator / Manager

12 October 2020

**Background documents:**

2015 Firefighters’ Scheme Complaints and Dispute process:

<http://www.wypf.org.uk/Member/Fire/IDRP/InternalDisputeResolutionPro.aspx>

Pensions Risk Register