

LOCAL PENSION BOARD

Report of the Pensions Administrator / Manager

20 May 2021

PENSIONS UPDATE

1.0 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 9 April 2021 (for Wholetime Firefighters) and 15 April 2021 (for On-Call Firefighters), and compared with active membership as at 15 January 2021 (for both Wholetime and On-Call Firefighters).

3.1.1

Firefighters' Pension Schemes Membership	Wholetime	
	09/04/2021	15/01/2021
1992	28	28
2006	2	2
2015	261	254
Retained Modified	2	2
Opted Out	14 (4.56%)	14 (4.65%)

- 3.1.2 The variations for wholetime membership are as follows:

- **1992 scheme** no movement
- **2006 scheme** no movement
- **2015 scheme** 8 starters (WT recruitment, on-call staff on temporary WT or OSR posts)
1 leavers
- **Retained modified scheme** no movement

- **Opt Outs** 0 members have opted out of the 2015 Scheme since the 3 March 2021 Board meeting.

3.2

Firefighters' Pension Schemes Membership	On-Call	
	15/04/2021	15/01/2021
1992	0	0
2006	4	4
2015	310	309
Retained Modified	9	9
Opted Out	13 (3.49%)	14 (3.79%)

3.2.1 The variations for On-Call membership are as follows:

- **2006 scheme** no movement
- **2015 scheme** 19 starters (new employees)
18 leavers
- **Retained modified Scheme** no movement
- **Opt Outs** 0 members have opted out of the 2015 Scheme since the 3 March 2021 Board meeting.

3.3 The following table shows the retired members according to each scheme as at 21 May 2021 compared to 15 February 2021. Membership continues to be split between pensioners and dependants.

3.3.1

Firefighters' Pensions Schemes Retired Membership	21/05/2021	15/02/2021
1992 (Pensioners)	443	444
1992 (Dependants – widow / partner / child pension)	83	82
2006	20	21
2006 (Dependants – widow / partner / child pension)	2	1
2015	13	13
2015 (Dependants – widow / partner / child pension)	3	3
Retained Modified	54	54

Retained Modified (Dependants – widow / partner / child pension)	2	2
--	---	---

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

- **1992 scheme** 1 death of a pensioner
1 new dependant pensioner
- **2006 scheme** 1 death of a pensioner
1 new dependant pensioner
- **2015 scheme** no movement
- **Retained modified scheme** no movement

3.4 The following table shows the deferred members of each scheme as at 21 May 2021, compared to those as at 15 February 2021.

3.4.1

Firefighters' Pensions Schemes Deferred Membership	21/05/2021	15/02/2021
1992	28	28
2006	146	146
RDS Modified	25	25
2015	214	195

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:

<https://www.wypf.org.uk/firefighters/internal-dispute-resolution-procedure/>

There have been no new IDRP applications since previous meeting.

5.0 Pension Board Training Update

5.1 No formal training has been arranged for this 8 June 2021 Board meeting, but all Board members should have now revisited the Regulator's online learning (which is undertaken every 2 years).

6.0 Other Work Items

- 6.1 Monthly postings up to and including April 2021 have been submitted to West Yorkshire Pension Fund (WYPF).

This means that as the more detailed posting needed for the final month (March) has been completed, scheme members will receive their Annual Benefit Statement (ABS) within statutory timescales.

- 6.2 Staying with ABS, the former Pensions Administrator / Manager contacted those members who are currently protected in one of the final salary schemes to advise them that no projections will feature on this year's ABS due to their final salary scheme membership ending on 31 March 2022. The summary of the LGA Firefighters' Pension Scheme bulletins, issued since the previous meeting (section 9), provides more detail.

- 6.3 Due to the annual payment of 'overtime holiday pay' being overlooked until December 2020, 21 retirement cases were revisited by notifying WYPF of this additional (very small) element of pay.

On a related matter, those historic cases of additional pay that weren't advised to WYPF (discussed at the previous meeting and added as a new breach on the breach register) have all been settled.

- 6.4 As requested in a recent LGA Firefighters' Pension Scheme bulletin, the former Pensions Administrator / Manager submitted the annual return of nil IDRPs applying during 2020/21 by LGAs 31 May deadline.

- 6.5 As requested by WYPF, the former Pensions Administrator / Manager confirmed whether c300 scheme members were in scope for remedy. These cases were unclear to WYPF due to their scheme membership commencing after 1 April 2012 (the effective date for the original protections and thus remedy). However, as the protection regulations extend to firefighters who were employed at 1 April 2012 and so entitled to join the pension scheme, WYPF needed confirmation of their employment start date for the role(s) concerned.

- 6.6 Since the previous meeting the former Pensions Administrator / Manager assisted the Head of Finance with membership statistics / reconciliations across the schemes, including current level of pension for deferred members and pensioners / beneficiaries as part of the information needed for the Government Actuary's Department to enable them to provide the necessary disclosures for the Authority's accounts.

- 6.7 Since the previous meeting the former Pensions Administrator / Manager provided a range of evidence to Mazars, the external auditor, relating to retirements and the payment of lump sums during 2020/21.

- 6.8 Pension Remedy / Immediate Detriment – an update will be provided at the meeting

- 6.9 On 20 May the new SAB chair Joanne Livingstone hosted a webinar to launch the new national member website for FPS - <https://fpsmember.org/>

- 6.10 Payroll / Finance contribution: work on the recent accounts disclosures identified a range of recent retirees being shown against the wrong scheme at WYPF's end. This matter has been raised with WYPF and work is currently on-going to correct these codings.

7.0 Discretions made by Scheme Manager

- 7.1 The Police, Fire and Crime Commissioner is the Scheme Manager for North Yorkshire Fire Pension Scheme. The Scheme Manager is responsible for the operation of the scheme. .

8.0 Legislative update

SI	Reference title
2021/163	The Guaranteed Minimum Pensions Increase Order 2021
2021/214	The Occupational and Personal Pension Schemes (General Levy)(Amendment) Regulations 2021
2021/267	The Social Security Revaluation of Earnings Factors Order 2021
2021/275	The Pensions Increase (Review) Order 2021
2021/276	The Public Service Pensions Revaluation Order 2021
2021/314	The Automatic Enrolment (Earnings Trigger and Qualifying Earnings Band) Order 2021
2021/197	Correction Slip 1 to the Restriction of Public Sector Exit Payments (Revocation) Regulations 2021
2021/506	The Pension (Non-Taxable Payments Following Death)(Real Time Information) Regulations 2021
Act	Reference title
2021 c.1	Pensions Act 2021

9.0 Firefighters' Pension Schemes Bulletins Summary

Age discrimination remedy consultation response published

On 4 February HM Treasury (HMT) published its consultation response on changes to the transitional arrangements to the 2015 public service pension schemes. The response confirms that discrimination will be addressed in two parts.

To remove future discrimination from the schemes and ensure equal treatment, all remaining protected members who are not currently members of FPS 2015 will transfer into this scheme on 1 April 2022. This means that all future service for all members will build up in the reformed CARE scheme. Final salary benefits already built up are fully protected.

For benefits built up during the period of discrimination, 1 April 2015 to 31 March 2022, unprotected and taper members will be credited with final salary build-up in their original scheme. At retirement, all members will be able to keep their legacy final salary benefits or choose to receive the CARE benefits that they would have built up in the same period.

While we expect that transferring remaining members into FPS 2015 at 1 April 2022 will be relatively straightforward, the conversion of CARE benefits into final salary will involve complex administrative processes with adjustments of pay, contributions, tax relief, and pensions tax liabilities.

The consultation response addresses some of these issues, however, further policy decisions are needed in some areas. The Home Office will consult separately on changes needed to the Firefighters' Pension Scheme regulations to enact the remedy.

More information can be found on our age discrimination remedy implementation page.

We understand that members will have many questions about what these changes mean. At present, employers and administrators can only provide the general information that can be found in the consultation response. Until the necessary changes are made to the pension administration software systems, it will not be possible to provide estimates of benefits for members. This is likely to take some time.

Members do not need to take any action, as remedy will automatically be applied if they are eligible. The Home Office has published a list of frequently asked questions with information about scope and the decisions that the government have made. We are working closely and at pace across the whole of the FPS sector and with government departments to support FRAs through the remedy implementation process.

Valuation

At the same time as publishing the response setting out the government's approach to removing discrimination, HMT also announced the position on both the paused 2016 cost cap valuation and the 2020 valuation, in written statement HCWS757.

2016 valuation

The pause on the 2016 cost cap valuation will now be lifted, and the Government Actuary's Department (GAD) will now proceed with finalising the valuations based on the DCU approach to removing discrimination.

The cost cap for the FPS was set as 16.8 per cent¹ as at 1 April 2015. The provisional result of the 2016 valuation before the pause was effected was a cost cap cost of 11.6 per cent², which was 5.2 per cent lower than the cost cap floor set in April 2015.

The current process sets out that any breach to the floor of the cost cap would see improvements to scheme benefits to bring the cost cap back within range and, conversely, any ceiling breaches would see reductions to scheme benefits. Floor breaches refer to a change in value by more than 2 per cent below the established cost cap, i.e. less than 14.8 per cent, and a ceiling breach is a change in value by more than 2 per cent above this figure, i.e. more than 18.8 per cent.

Employers are continuing to pay increased employer contributions based on improving scheme benefits because of the floor breach in the paused 2016 cost cap valuation. The government confirmed that early estimates of the cost cap taking into account the increased value of public service schemes to members as a result of the McCloud remedy mean that on review some schemes would now breach the ceiling. For the FPS this would mean the cost cap cost once calculated would have to be above 18.8 per cent.

If normal statutory procedure were followed, any ceiling breaches would lead to a reduction in member benefits to bring costs back to target. However, the government have announced that it would be inappropriate to reduce member benefits at this time and the effect of any ceiling breaches on the 2016 valuation would be waived.

2020 valuation

In July 2020 the government announced a review to the mechanism to control the cost of public service pensions for future valuations. While this review will not affect the process of the 2016 cost cap valuation which will continue on the current mechanism, the 2020 valuation will be subject to any recommendations as a result of this review.

The Government announced in written statement HCWS757 that due to interactions with wider pension policies, in particular the implementation of the McCloud remedy reforms, completion of the 2016 valuation process and the review of the cost control mechanism, any changes to employer contribution rates resulting from the 2020 valuations will be delayed from April 2023 to April 2024.

That has the effect that employer contributions will remain at the same rate as set in the 2016 valuation until 2024. Further updates on any changes to that position will be made when information becomes available.

Transitional protections pensions claims: Schedule 22 appeal judgment

On 12 February, the Employment Appeal Tribunal (EAT) gave its judgment on the FRAs' appeal based on Schedule 22 of the Equality Act 2010. This appeal was based on the argument that the FRAs did not make the legislation which was found by the Court of Appeal to be discriminatory on grounds of age but were bound to follow it because it was the law. The EAT held that the FRAs cannot rely on the Schedule 22 defence.

Further information has been provided to the person nominated by each FRA to receive communications in respect of this, and related, legal cases. The Steering Committee and legal representatives are considering whether it is appropriate to appeal the judgment.

Immediate Detriment

Following the decision of the EAT on the FRAs' schedule 22 appeal detailed above and its effect on Section 61 of the Equality Act 2010, FRAs will now want to consider their decision in relation to payments under the immediate detriment guidance, which was issued by the Home Office at the request of the Fire Brigades Union on 21 August 2020.

FRAs now need to determine whether they have the necessary information available to them to make decisions and understand the risk to their organisation. To do this they may want to consider:

1. Is the six-page note provided by the Home Office and in-house scheme knowledge sufficient to enable accurate calculations for members? The note from the Home Office is labelled as informal guidance only. There has been no update from HMT or the Home Office on this note since it was published in August 2020, albeit a more cautionary note was included under question 10 of the Home Office FAQs that the legislation that allows schemes to do this is limited in effect (we believe that is a reference to Section 61 of the Equality Act), which does not allow for all consequential matters to be dealt with satisfactorily in all cases. For example, in cases where there are interactions with the tax system, perhaps where members have incurred or will incur tax charges or where contributions differ between the schemes.

The LGA published an immediate detriment information note for FRAs in October which gave further clarification of the technical issues yet to be commented on by the Home Office or HMT and the issues that would need to be decided by FRAs in their decision making on making any immediate detriment payments.

2. What does the local cohort of membership look like with regards to members whose calculation of benefits would be subject to policy decisions yet to be made, such as CETVs received after 1 April 2015, added pension payments, or pensions tax?

The Scheme Advisory Board (SAB) requested data from FRAs on these cohorts but only received 33 of 45 replies.

3. What risk is there to the member on accepting payments without key policy decisions in place, and how will the member be told of this risk? In considering this risk FRAs and members may wish to consider that final policy decisions have not yet been made on issues such as, how to claim tax relief on pension contributions owed, how to apply interest to contributions due, how pension tax might be calculated and paid, and what legislation is in place to deal with these issues before the pension scheme regulations are changed bearing in mind the note of caution in question 10 of the FAQs.

4. What governance might FRAs put in place to assure themselves that:

- a. The correct benefits will be paid to members
- b. Members have been satisfactorily made aware of expectations such as future payments owed due to interest being applied to contributions arrears.
- c. Necessary processes will be in place to calculate and record the payments due bearing in mind that no automated processes or systems are available for the calculations until the significant software development needed has been completed.

5. How might they record their decision making so it is clear and transparent? Having considered the above points, FRAs will wish to ensure they document their decision making for clarity and transparency. An assessment matrix was included with the October note to help FRAs identify whether they have all the information necessary to make a payment.

Draft remedy data collection guidance

In order to credit members with their original legacy scheme membership for the remedy period, administrators will need additional data from FRAs to rebuild the final salary record. For example, an unprotected member who transitioned to FPS 2015 from FPS 1992 on 1 April 2015 and remains in employment will need a final salary record creating for the full seven years from 1 April 2015 to 31 March 2022.

To assist administrators and FRAs with the process of collecting data and ensure consistency where possible, we intend to provide a template of data items that will be required. We are currently working with the software companies to agree the required data fields and formats. In the meantime, we have written a supporting document in conjunction with the Fire Communications Working Group (FCWG) to allow parties to identify where additional data will be required and what processes might need to be put in place to collate it.

FRAs should now work with their administrators to identify all eligible members and consider any processes or additional resources that need to be put in place to identify the data required, in advance of the standard template being provided.

FPS contribution rates 2021-22

Banded contribution rates were introduced to the Firefighters' Pension Scheme 1992 and the Firefighters' Pension Scheme (England) 2006 by Statutory Instruments 2012/953 and 2012/954 respectively.

These rates have subsequently been amended each year by an amendment order to the schemes. The most recent amendments⁴, which came into force on 1 April 2015, listed the rates applicable from 2015-2016 to 2018-2019, including contribution rates for Special Members of the Firefighters' Pension Scheme (England) 2006.

The Firefighters' Pension Scheme 2015 was introduced on 1 April 2015 by SI 2014/2848. Regulation 110 set out details rates applicable from 2015-2016 to 2018-2019.

For 2019-2020, FRAs were instructed that the 2018-2019 rates would continue to apply, due to the pause of the cost-cap mechanism. These rates will continue to apply for 2021-2022.

The contribution rate factsheet reminds FRAs of the contribution rates set out in the above Regulations and Orders which will apply from 1 April 2021.

Lifetime allowance factsheet updated

The Lifetime Allowance factsheet for members has been updated in collaboration with the FCWG and is available from our website under guides and sample documents.

HMT consult on implementation of increased normal minimum pension age

The normal minimum pension age (NMPA) is the minimum age at which most pension savers can access their pensions without incurring an unauthorised payments tax charge (unless they are taking their pension due to ill-health). It is currently age 55.

On 11 February 2021 HMT published a consultation on implementing an increase to NMPA from age 55 to age 57 on 6 April 2028. The consultation confirms that the increase will not apply to those who are members of the Firefighters' Pension Schemes [paragraph 1.12]. The consultation closes on 22 April 2021.

Pension Schemes Bill becomes law

The Pension Schemes Bill 2019/2021 was granted Royal Assent on 11 February 2021 and is now the Pension Schemes Act 2021.

The Act enhances the powers available to the Pension Regulator (TPR) to protect pension savers. On 16 February, David Fairs, Executive Director of Regulatory Policy, Analysis and Advice at TPR, published a blog examining the new provisions.

The Act also drives forward the pensions dashboards agenda, by creating a legislative framework for dashboards and paving the way for the secondary legislation that will make it mandatory for pension providers and schemes to connect to them.

Top Up grant 2021: Collection of pensions accounting data – action required

On 31 March 2021, the Home Office sent an email to Claim Certifiers and Administrators to advise that FRAs should now be working towards submitting audited 2019/20 and unaudited 2020/21 pensions income/expenditure data as part of this year's top up grant claim. This year's pension accounting data will need to be submitted on the DELTA online data collection system. Notification will be sent via DELTA when the forms go live.

ACTION: In addition to the pensions income/expenditure data to be submitted on DELTA, the Home Office are also requesting that all FRAs provide electronic copies of the trial balances from audited accounts where the pensions income/expenditure data was extracted for completion of the audited 2019/20 DELTA return by email, to include any post balance sheet adjustment events. These should be sent to Anthony.Mooney@homeoffice.gov.uk.

FRA remedy self-assessment survey warm-up

To make sure that the LGA and SAB can offer the right level and type of support, we will shortly be asking FRAs to complete a self-assessment survey to tell us how prepared they feel for implementing age discrimination remedy.

The survey will be completed via Survey Monkey and we will be offering telephone appointments to all FRAs to go through the questions. We expect that this will take place during May 2021.

TPR consult on new modular code of practice

On 17 March 2021 the Pensions Regulator (TPR) published a consultation on the draft content for a new code of practice.

The first phase of the new code consists of 51 shorter, topic-based modules. These replace 10 of the existing codes of practice and mainly deal with the governance and administration of pension schemes.

Setting the standard Lifetime Allowance from 2021/22 to 2025/26

At the Spring Budget on 3 March 2021, the government announced that legislation will be introduced in the Finance Bill 2021 to remove uprating in line with the consumer price index for tax years 2021/22 up to and including 2025/26.

The amount of the pension lifetime allowance for tax years 2021/22 up to and including 2025/26 will remain at £1,073,100.

Annual Benefit Statements 2021

The yearly process for producing Annual Benefit Statements (ABS) will have now started and readers will be familiar with the requirement for statements to be issued by 31 August 2021. The following comments have been made to recognise the position of HM Treasury (HMT) policy decisions on ABS for this year

Current Values

The scheme regulations require benefit statements to produce a current value at 31 March of the relevant scheme year and, as per paragraph A.56 of the HMT consultation response, future statements will need to provide both values of legacy and reformed benefits for the remedy period within that current value.

We understand that it will be disappointing to members that the current values on this year's ABS will not be able to reflect the remedy choice between legacy and reformed benefits at this stage. However, those calculations will require significant software amendment which are not expected until 2023, therefore current values for this year will reflect members' current scheme membership only.

Projections

Traditionally it has been common for the Firefighters' Pension Scheme to include projections to normal pension age as part of the ABS. We understand these projections are valuable to members as it allows them to understand the likely value of their benefits at retirement age; however, projecting CARE benefits can be an imperfect science as the projections cannot cater for a future change in accrual rate due to a change in cost cap, nor can it cater for inflation on future pay and promotions.

Chapter 3 of the consultation response deals with the decision to close legacy schemes for future accrual on 31 March 2022, and the final paragraph of that section [3.56] confirms that primary legislation will be introduced to close the legacy schemes on 31 March 2022. Currently protected members of the scheme were protected based on achieving normal pension age by 31 March 2022, therefore most protected members are expected to retire before 31 March 2022. However, it is possible that a small cohort of members will continue past 31 March 2022 to reach their 30-year service date. After 1 April 2022 they will continue in the scheme as a member of FPS 2015.

Benefit statements for protected members should not reflect final salary benefits accrued past 31 March 2022.

Therefore, any projections that would ordinarily have been projected past 31 March 2022 (such as to 30 years' service) should not be included in the ABS issued this year. Unfortunately, due to the significant software amendments that are required, it is not currently possible to accurately project future benefits in FPS 2015 for currently protected members. Administrators may take different approaches with regards to this depending on whether they issue paper statements or via self-service; however, members due to retire before 31 March 2022 should be able to request an estimate in their usual way.

Appropriate messaging

It is recommended that this approach should be communicated to members in the ABS using the following caveat:

***"Important:** Please note that this year's Annual Benefit Statement provides an estimate of your pension benefits built up in your current scheme membership to 31/03/2021.*

On 20 December 2018, the Court of Appeal ruled in McCloud/Sargeant that the transitional arrangements introduced as part of the 2015 reforms to the Firefighters' and Judges' pension scheme were discriminatory and, therefore, unlawful. The Government subsequently accepted that this ruling applied to all the main public service pension schemes.

The Government has consulted on the changes needed to remove discrimination from the schemes and work is ongoing to make these changes. This work is complex and will take time. We understand that it will be disappointing to members that the current values of this year's statement will not be able to reflect the remedy choice between legacy and reformed benefits at this stage, however, the rules and systems are not yet in place to calculate benefits with discrimination removed. This means that it has not been possible to reflect the impact of the Court of Appeal ruling in this year's Annual Benefit Statements.

*Any projections on your pension entitlement are based on the assumption that your current membership will continue until your normal pension age. All currently **protected members** will be placed in the FPS 2015 for service after 1 April 2022 (the end of the remedy period). Due to the software changes needed to illustrate this, it will not be possible to reflect this position in projected benefits this year. [Optional for those who wish to provide estimates - Members due to retire before 31 March 2022 should be able to request an estimate in their usual way.]*

In advance of statements being issued, you may also wish to re-confirm the two-stage approach¹ taken by HMT to remove the discrimination and reassure members that although remedy may not be able to be reflected in the ABS, members will in due course be able to choose to receive legacy pension scheme benefits for the remedy period (1 April 2015 to 31 March 2022). Membership of the Firefighters' Pension Schemes after 1 April 2022 will continue for all members in FPS 2015.

Details of how the Government intend to remove the discrimination can be found on the age discrimination remedy implementation page of www.fpsregs.org. We will provide an updated version of the standard ABS template in the next bulletin.

IDRP data collection: action needed

In FPS Bulletin 30 – March 2020 we began the first round of data collection for Internal Dispute Resolution Procedures (IDRPs). We advised FRAs that this would be an

annual process in line with the scheme year, to collect numbers of cases and any emerging themes.

As the next scheme year has recently ended, we ask that FRAs complete the spreadsheet at Appendix 1 and return this to bluelight.pensions@local.gov.uk by 31 May 2021.

Hampshire and Isle of Wight FRSs combine

Forty-five became forty-four on 1 April 2021 when Hampshire and Isle of Wight Fire and Rescue Services combined into a brand-new organisation.

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.

North Yorkshire Fire (1 to 30 April 2021)						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Transfer <u>In</u> Quote	1	10	1	85	100	8
Divorce Settlement / Pension Sharing order Implemented	1	80	1	100	100	2
Deferred Benefits Set Up on Leaving	5	10	1	85	20	40.8
Pension Estimate	2	10	2	85	100	1
Pension Set Up / Payment of Lump Sum	2	3	2	85	100	1
Deferred Benefits <u>Into</u> Payment / Payment of Lump Sum	1	3	1	85	100	3
Retirement Actual	2	10	2	85	100	1
Set Up New Spouse Pension	1	5	1	85	100	1
Change of Address	2	20	2	85	100	2.5
General Payroll Changes	4	20	4	85	100	1
Death Grant Nomination Form Received	1	20	1	85	100	9
Initial letter Death in Retirement	1	5	1	85	100	1
Death in Retirement	1	5	1	85	100	1
Update Member Details	6	20	6	100	100	1
Payment of Spouses / Child Benefits	1	10	1	100	100	1
Monthly Pension	629	Pay date	629	100	100	

11.0 Recommendations

11.1 That Members note the content of the report.

David Hood

Pensions Administrator / Manager

20 May 2021

Background documents:

2015 Firefighters' Scheme Complaints and Dispute process:

<https://www.wypf.org.uk/firefighters/internal-dispute-resolution-procedure/>

New national member website for FPS - <https://fpsmember.org/>