

Pension Board Training
Firefighter Pension Schemes
27th February 2018

Agenda

- Introduction and group session
- A background to the Fire Pension Schemes
- The Pension Regulator expectations
- Data – Preparing for GDPR
- Scheme Advisory Board Update
- Expectations of pension boards, including reporting and self-assessing
- Current and Future Issues

Group Discussion

- What do you think is most challenging for board members?
 - What value do you think Local Pension Boards can bring to the management of the pension schemes?
-

Introduction to the Firefighter Pension Schemes

Firefighter Pension Schemes

Nearly 12 years ago



1992 Firefighter Pension Scheme

- Open to regular firefighters
- 1/60th accrual rate
- Double accrual after 20 years
- Maximum service is 30 years
- Earliest retirement age 50
- Final Salary scheme
- Actuarial commutation factors
- Injury benefits
- Built in ill-health benefits/life cov
- Pension for Widow's/Children
- Deferred pension age 60



Firefighter Pension Scheme

Then in 2006.....



2006 Firefighter Pension Scheme

- Open to regular and retained firefighters from 6th April 2006
- 1/60th accrual rate
- Maximum service 40 years
- Retirement age 60
- Earliest retirement age 55 (subject to reductions)
- Final Salary Scheme
- Commutation based on 1 : 12 ratio
- Built in ill health benefits/life cover
- Pension benefits for Partners/Children
- Deferred pension age 65



2006 Reform

Firefighters Pension Scheme 1992

- Closed to new entrants from 6 April 2006
- Options Exercise

Firefighters Pension Scheme 2006

- Open to regular and retained Firefighters appointed after 6 April 2006
- New retirement age

Firefighters Pension Fund

- New notional funding mechanism

Firefighters Compensation Scheme

- Injury benefits removed from the pension scheme rules and a separate set of regulations were created
-

Firefighter Pension Schemes

Now.....



Special Members of the 2006 Firefighter Pension Scheme

- Ability for those retained who were excluded from a scheme from 2000 – 06 to join a scheme similar to the FRS 1992.
- Benefits reflect 1992 scheme (in part)
- Incorporated into 2006 scheme
- Accrual rate 1/45th
- Normal pension age 55
- Deferred pension age 60
- Built in ill health benefits/life cover
- Pension benefits for Partners/Children
- The options exercise ended September 2015.



2015 Firefighter Pension Schemes

- All members transferred in April 2015
- Transitional protections apply for existing members of 1992/2006 scheme
- Accrual rate 1/59.7ths
- Retirement Age 60
- Earliest retirement age 55 (subject to reduction)
- Career Average scheme
- Individual Pension accounts
- Deferred pension age equal to State Pension age (65)



Scheme Comparison

Feature	1992 Scheme	2006 Scheme	Modified Scheme	2015 Scheme
Basis of pension	Final salary	Final salary	Final salary	(CARE)
Accrual rate	40/60ths 1/60 th (2/60 th after 20 years)	1/60 th	1/45 th	1/59.7 th
Benefit / Membership Cap	40/60 th	45 years	30 years	None
Revaluation rate	n/a	n/a	n/a	Average Weekly Earnings

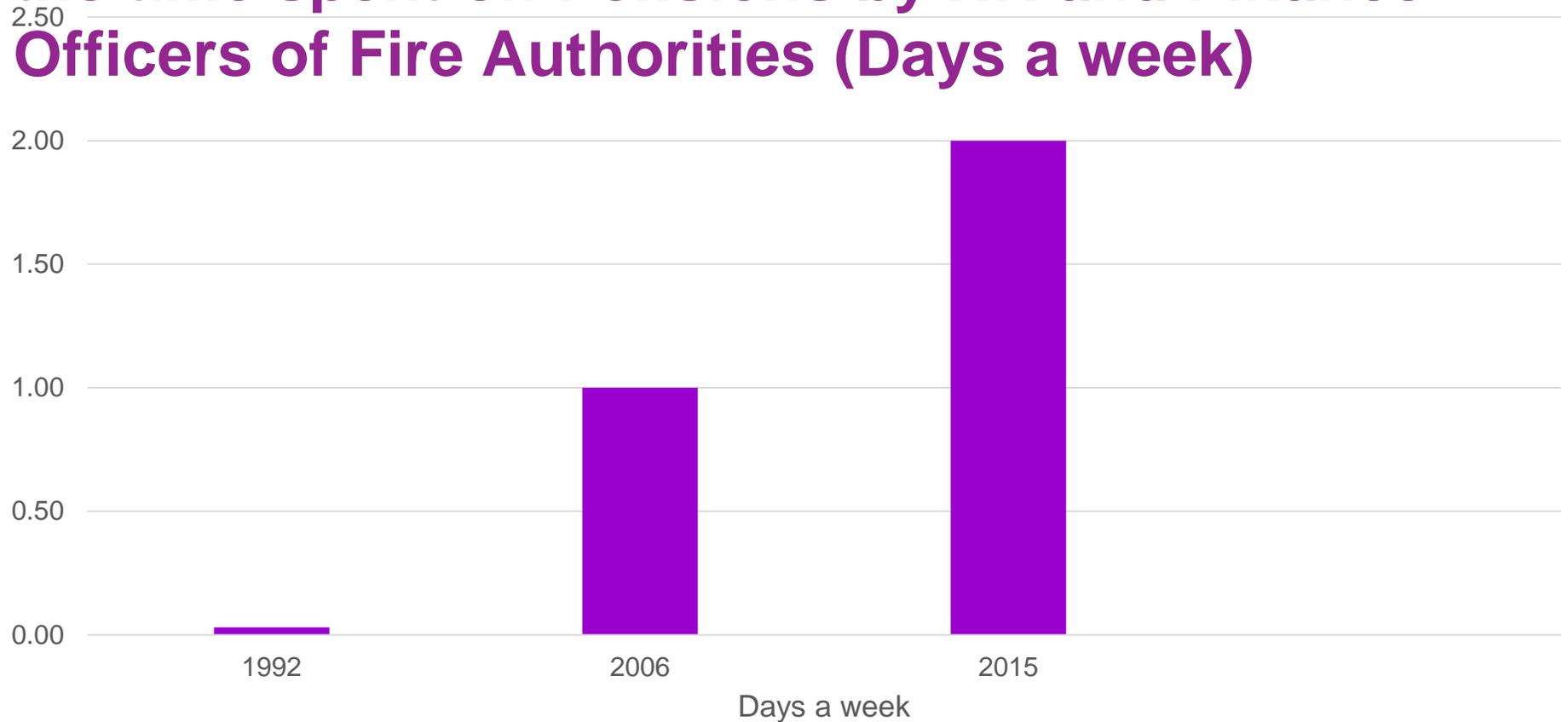
Governance

- Local Pension Boards to secure compliance
 - Increased documentation and policies
 - Training of Boards
 - Introduction of The Pensions Regulator
 - Record breaches not just report
 - Managing risks and internal controls
-

An important note

- These slides are intended to provide an overview of the scheme regulations and should not be regarded as a complete guide
 - Please note that it is the responsibility of each FRA to apply the rules of the pension scheme in accordance with their interpretation of the scheme and to obtain legal advice where they consider this is necessary.
 - The information contained in these slides have been provided to give some guidance on the rules of the pension scheme, however they should be used only as an informal view of the interpretation of the firefighters' pension scheme as only a Court can provide a definitive interpretation of legislation.
-

Overall effect of changes in the last ten years on the time spent on Pensions by HR and Finance Officers of Fire Authorities (Days a week)



Illustrative only

Scheme Regulations

- FPS 1992 Regulations
<http://www.fpsregs.org/index.php/regulations/fps-1992-regulations>
- FPS 2006 Regulations
<http://www.fpsregs.org/index.php/regulations/fps-2006-regulations>
- FPS 2015 Regulations
<http://www.fpsregs.org/index.php/regulations/fps-2015-regulations>
- Firefighters' Compensation Scheme
<http://www.fpsregs.org/index.php/regulations/firefighters-compensation-scheme>





The Pensions
Regulator

Public Service Pension Schemes



**Local Pension Board Training
County Hall, Morpeth**

Stephen Rowntree
Industry liaison manager

27th February 2018

**The information we provide is for guidance only and
should not be taken as a definitive interpretation of the law.**

**The Pensions
Regulator**

Introduction

- We regulate the governance and administration of public service pension schemes, which provide pensions for civil servants, the judiciary, local government, teachers, health service workers, members of fire and rescue services, members of police forces and members of the armed forces
- Our Code of Practice 14 sets out the standards of conduct and practice we expect

8 workforces



16.5 million
memberships

24,000
employers

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Local pension boards

Pension boards are responsible for assisting the scheme manager in securing compliance with:

- scheme regulations
- other governance and administration legislation
- any requirements of The Pensions Regulator
- additional matters, if specified by scheme regulations
- pension boards need to have an equal number of employer representatives and member representatives (they may also have other types of members, such as independent experts).

Our roles and responsibilities

- We regulate compliance with the Governance and Administration requirements introduced by the Public Service Pensions Act 2013:
 - we engage mainly with scheme managers and pension boards
 - investment: not the what (compliance with investment regulations) but the how (investment governance)
 - www.tpr.gov.uk/guidance/db-investment.aspx
- To educate and enable:
 - codes, toolkit, news-by-email
 - www.tpr.gov.uk/doc-library/codes.aspx
 - <https://trusteetoolkit.thepensionsregulator.gov.uk/>
 - <https://forms.thepensionsregulator.gov.uk/news-by-email/subscribe>
- To enforce:
 - improvement and third party notices, fines etc



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Our regulatory powers

- Appoint a skilled person to assist the pension board
- Civil penalties – up to £5,000 to an individual or £50,000 to a corporate body
- Collect data through the scheme return
- Criminal prosecution
- Improvement notices and third party notices – require specific action to be taken within a certain time
- Information – require any relevant person to produce any relevant document or information
- Inspection – at own premises and/or premises of a third party
- Publish reports about a case (which might include naming those at fault)
- Recover unpaid contributions from employers on behalf of the scheme manager
- Report misappropriation – notify the scheme manager about pension board conflicts or misuse regarding assets
- Skilled person report – require scheme managers to provide a report made by a skilled person nominated by the regulator

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Legislative scope: Code of practice 14

Scheme governance:

1. knowledge and understanding required by pension board members
2. conflicts of interest and representation
3. publishing information about schemes

Managing risks:

4. internal controls

Administration:

5. scheme record-keeping
6. maintaining contributions
7. providing information to members

Resolving issues:

8. internal dispute resolution
9. reporting breaches of the law

TPR focus 2017/18

- Ongoing risk assessment and intelligence gathering
 - 2016 survey 90% response rate covering 98% of combined membership
 - 2017 survey sent out early November 2017
- Increasing emphasis on looking at locally-administered schemes
- Key focus areas:
 - record-keeping and data quality

We will use our educate/enable/enforce regulatory approach to help schemes comply and address key risks

Governance

- Scheme managers accountable party for most requirements
 - Some confusion remains on roles and responsibilities especially on pension boards
 - Variety of practice in how scheme managers work with pension boards:
 - scheme managers should use this valuable resource
 - pension boards should take an active role in identifying key risks and driving forward improvements
 - 21st Century governance key focus for TPR this year
 - how can government, regulatory bodies and the pensions industry raise the standards of trustee competence and improve the governance and administration of pension schemes
- www.tpr.gov.uk/21c-trustee

Internal controls

- The scheme manager must establish and operate adequate internal controls to enable them to administer and manage their scheme in accordance with the scheme rules and the law
- Internal controls are systems, arrangements and procedures for:
 - scheme administration and management
 - monitoring that administration and management
- Includes:
 - identifying and managing risk using a risk register – for an example
 - www.tpr.gov.uk/docs/public-service-example-risk-register.pdf
 - controls around administrators and employers (lessons from the National Audit Office report)
 - identifying and reporting breaches of the law
- Internal controls checklist - www.tpr.gov.uk/docs/public-service-internal-controls-checklist.pdf

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Record keeping

- Good record keeping is a key part to the successful running of a scheme and allows schemes to meet their legal obligations
- We know from engagement that standards vary widely, and some schemes do not prioritise this appropriately, so TPR expects:
 - scheme managers to engage with administrators over service and security
 - assess data and put in place a plan to address issues
- Guidance on developing an improvement plan:
 - www.tpr.gov.uk/docs/improve-data-guide.pdf

FPS record keeping - survey results

Most schemes are meeting our expectations of doing a data review annually

Last data review
68% in last 12 months
8% longer ago
4% never
20% don't know

But there are concerns as to the effectiveness of these reviews

Identified issues
34% identified issues
39% no issues identified
3% don't know if issues
24% not reviewed (inc. DK)

And take up of data improvement plans is low

Data improvement plans
2% data improvement plan
32% no data improvement plan
42% no issues identified (inc. DK)
24% not reviewed (inc. DK)

21% respondents identify poor records as a top risk

18% report delays in payment of benefits as one of top three complaints

1 in 5 identify poor records as key concern yet the quality of action taken varies.

PPS record keeping - survey results

Most schemes are meeting our expectations of doing a data review annually

Last data review
77% in last 12 months
11% longer ago
3% never
9% don't know

But there are concerns as to the effectiveness of these reviews

Identified issues
46% identified issues
32% no issues identified
10% don't know if issues
12% not reviewed (inc. DK)

And take up of data improvement plans is low

Data improvement plans
14% data improvement plan
32% no data improvement plan
35% no issues identified (inc. DK)
12% not reviewed (inc. DK)

1 in 3 respondents identify poor records as a top risk

$\frac{1}{2}$ of these cite GMP reconciliation specifically

26% of respondents report delays in payment of benefits as one of top three complaint

A third of schemes see record-keeping as a top risk, and employer data is a key concern, but the take up of data improvement plans is low

Improving your data (i)

- Scheme managers should undertake an annual data review and put in place an improvement plan where they identify issues
- Our quick guide (www.tpr.gov.uk/docs/improve-data-guide.pdf) can help you design a plan or assess an existing one, setting out key areas to consider:
 - objectives, outcomes, scope and prioritising, activities, dependencies, timeframes and timelines, resourcing, governance
- Accurate records are key to ensuring
 - the right members get the right benefits at the right time,
 - accurate valuations and calculation of the cost cap
- Poor data integrity has a real impact on members

Pension scheme data improvement plan

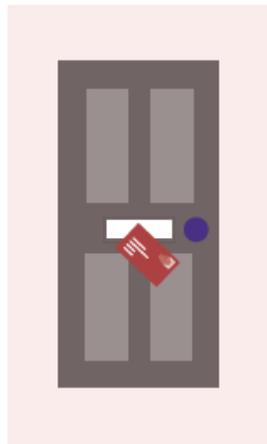


Improving your data (ii)

- Data improvement is a continuous process, not a one-off exercise
- The data needed to run an efficient and effective scheme should be checked regularly – both ‘common data’ (applicable to all schemes) and ‘conditional data’ (dependent on scheme type, structure and system design)
- Data should be well managed day to day to ensure it is accurate and complete
- Though administrators may look after records on a day-to-day basis, scheme managers are still accountable

Member communications

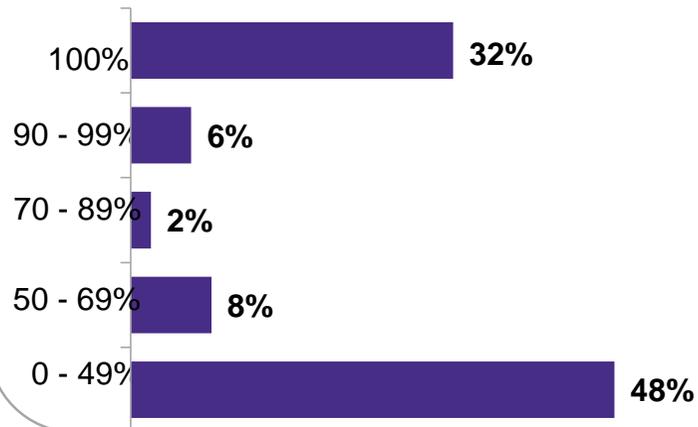
- New requirement to issue an annual benefits statement - for more guidance:
 - www.tpr.gov.uk/docs/public-service-annual-benefit-statements-guide.pdf
 - www.tpr.gov.uk/docs/public-service-annual-benefits-statement-checklist.pdf
 - www.tpr.gov.uk/docs/PS-guide-key-information-to-provide-to-members.pdf
- We expect schemes to tackle the issues faced in the early years and for the proportion of members who receive their statements on time to improve
- Good communications are not just timely and accurate, but also clear - many pension boards advise on this perspective



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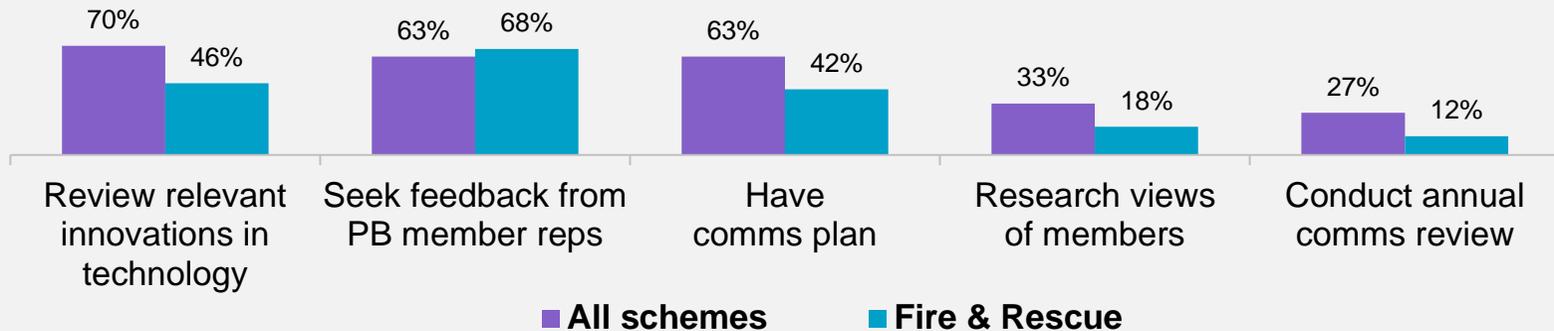
FPS member communications - survey results

Proportion of active members receiving annual benefit statement by statutory deadline



- Only a third of fire and rescue schemes reported that all members received their ABS on time
- 54% of memberships did not receive their ABS in time

Tools/processes to improve effectiveness of member communications

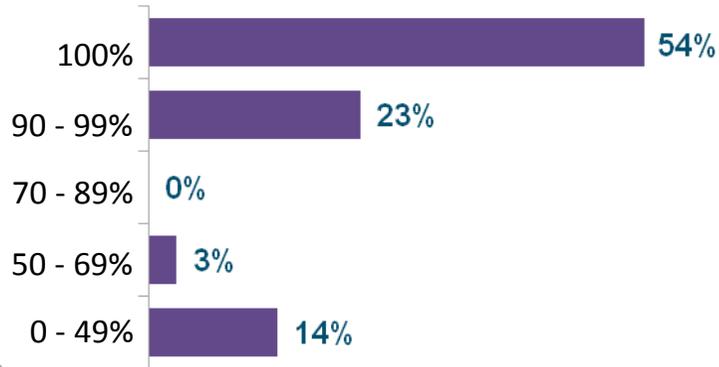


- The larger the scheme, the more likely it is to use a range of tools to try and improve comms

Over half of memberships did not receive their benefit statements in time. Fire and Rescue schemes less likely to have in place processes to improve member communications.

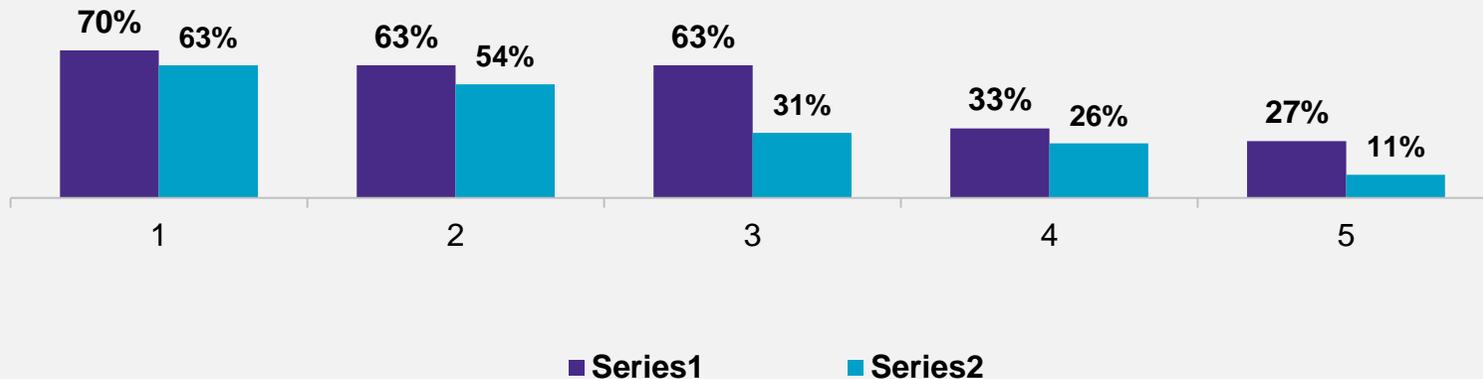
PPS member communications - survey results

Proportion of active members receiving annual benefit statement by statutory deadline



- Over half of police schemes reported that all members received their ABS on time
- 18% of memberships did not receive their ABS in time

Tools/processes to improve effectiveness of member communications



- The larger the scheme, the more likely it is to use a range of tools to try and improve communications

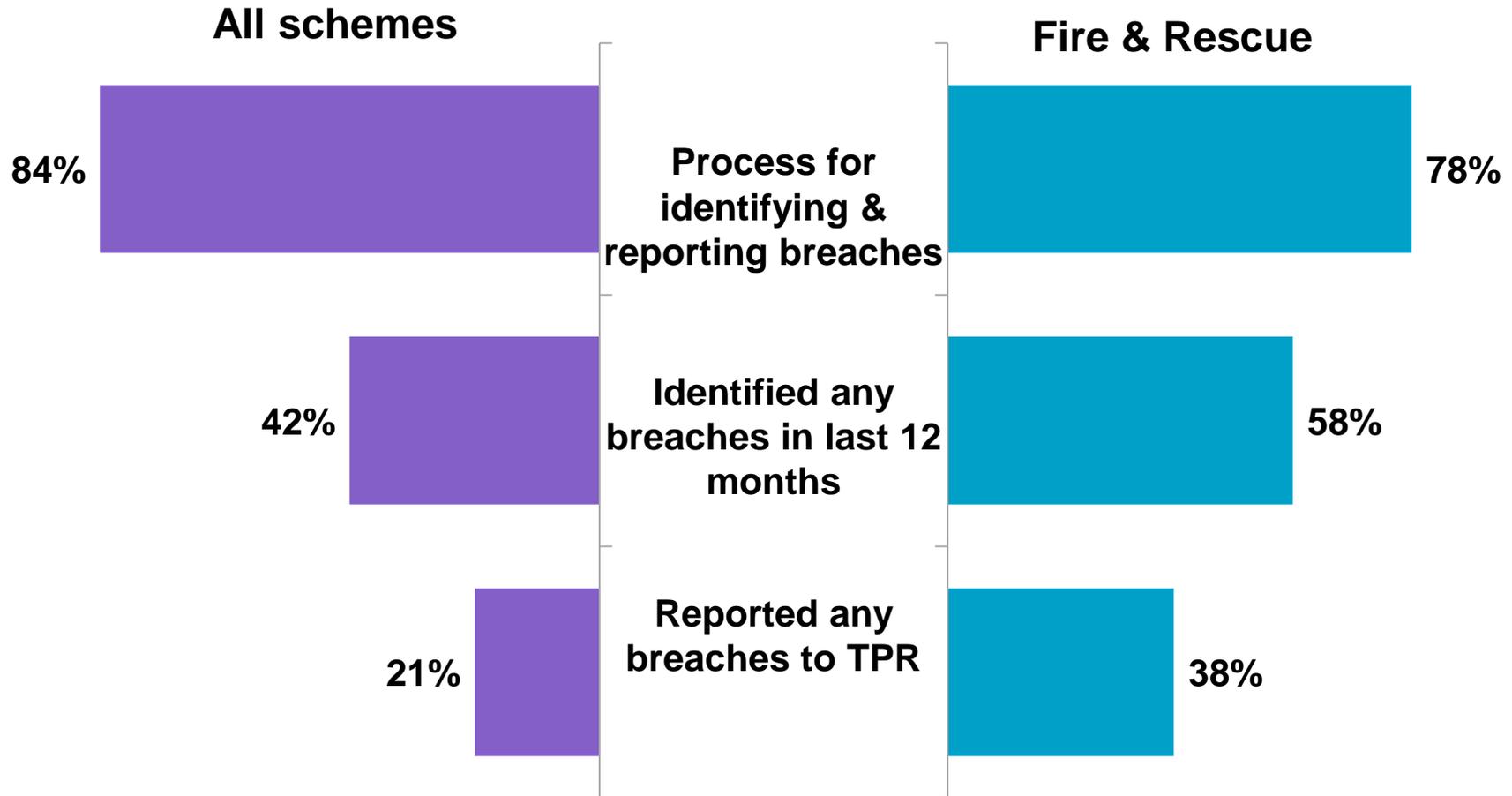
One in 5 members did not received their benefit statements in time. Police schemes significantly less likely to have a communications s plan or conduct annual communications reviews.

Reporting breaches of the law

- Legal duty to report a breach of the law that is likely of material significance to TPR for:
 - scheme manager
 - pension board member
 - professional advisers
 - employers
 - administrators and others providing advice to the manager
- Reporters to determine if a breach has occurred based on reasonable cause and not a mere suspicion
- TPR provides example scenarios and RAG system for assessing scale of materiality by way of:
 - cause
 - effect
 - reaction
 - wider implications
- www.tpr.gov.uk/docs/PS-reporting-breaches-examples-traffic-light-framework.pdf

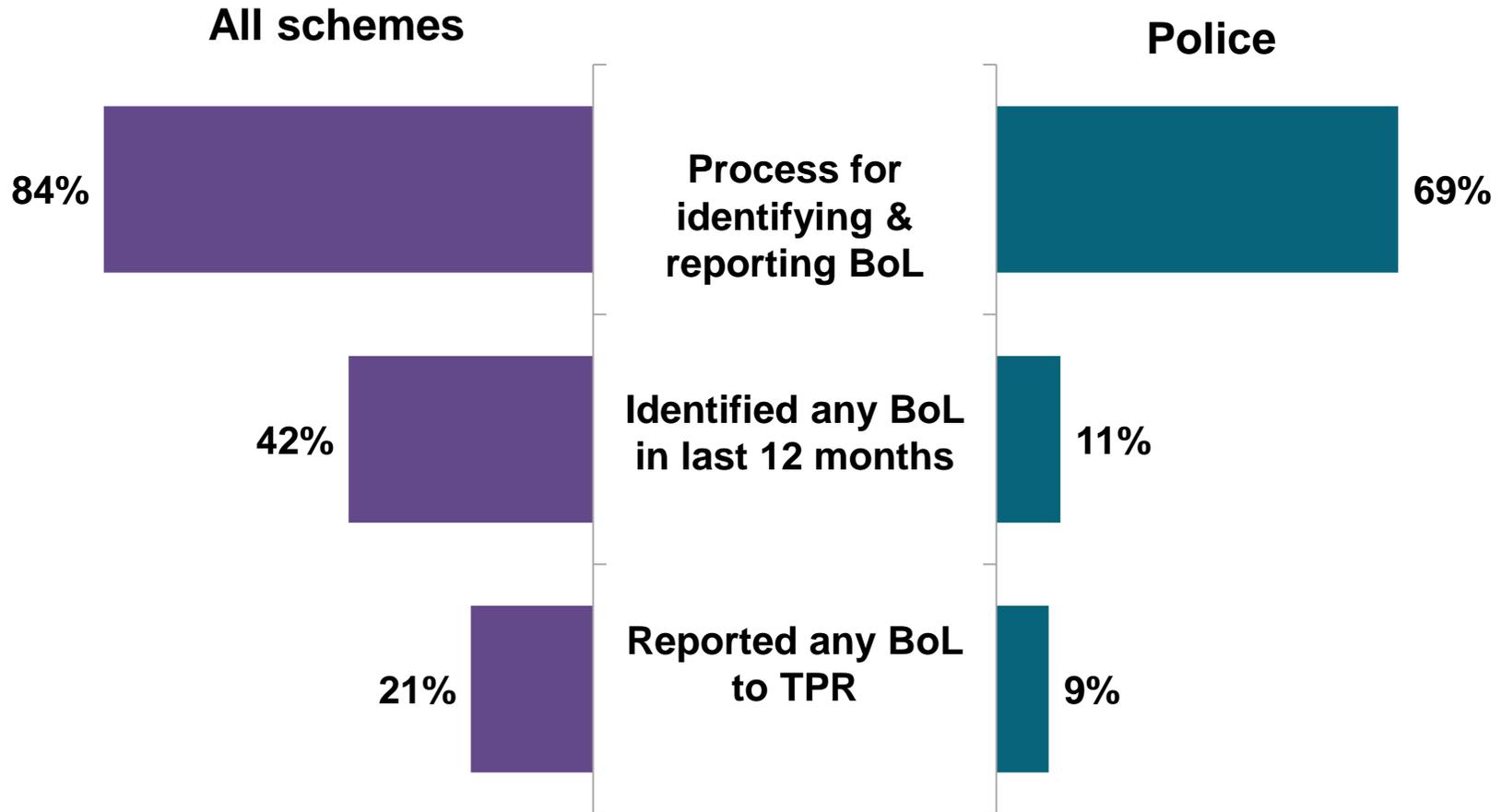
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Breaches of the law



FPS are more likely than average to identify or report breaches to the regulator

Breaches of the law



PPS are less likely than average to have processes in place around breaches, and to identify or report breaches to the regulator.

What are the challenges facing pension schemes?

- Enhanced requirements:
 - increased reporting requirements
 - GDPR (25 May 2018)
 - pensions dashboard (might become a legal requirement to provide member benefit data)
 - cyber security



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Scheme return requirements

- From 2018 will be asked to report on:
 - when scheme last measured common data
 - common data score
 - when scheme last measured scheme-specific (conditional) data
 - scheme-specific data score
- This will help us understand and segment the landscape and target interventions/track progress
- Common data = data used to identify members (eg DOB, NINO, name)
- Scheme-specific data = other data needed to run the scheme:
 - in public service schemes this includes data required by the regulations, data needed for valuation, compliance with scheme regulations etc
- This change for public service schemes may require systems and process changes
- Data measuring guidance - www.tpr.gov.uk/docs/measure-data-guide.pdf

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GDPR

- General Data Protection Regulation applies from 25 May 2018:
 - brings consistency across the EU
 - strengthens provisions of current data protection
 - stronger individual rights (new right to data portability)
 - new obligations on data processors
 - 72 hour reporting *if a breach is likely to result in a risk to people's rights and freedoms*
 - greatly enhanced fines available to the ICO
 - will remain after we leave the EU
- Data Protection Bill:
 - will replace 1998 Act
 - some implementation of GDPR, but other aspects.
 - pension scheme 'exception'

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The good news

“If you are already complying with the terms of the Data Protection Act, and have an effective data governance programme in place, then you are already well on the way to being ready for GDPR” - Steve Wood, Deputy Commissioner for Policy, ICO

- Controls put in place for GDPR help you meet your internal controls requirements under pension legislation

Pensions dashboard

- Put forward in Budget 2016
- Prototype dashboard delivered by the ABI - <https://pensionsdashboardproject.uk/industry/about-the-pensions-dashboard-project/>
- DWP now leading on feasibility study
- Whether scheme participation will be voluntary or mandatory is to be confirmed.

Welcome Emma Smith! last updated 27/03/2017 [refresh](#) [Logout](#)

Pensions found
4

Your pension income

at age **65**

Annually Monthly
£1,048
this number is a rough estimate

State Pension £676.80 monthly

Department for Work & Pensions
State Pension £676.80 monthly from age 67

Defined contribution pensions £56,984.00 total

AON **Geopost (uk) Limited**
Company scheme £39,797.00 total **£281** monthly (ESTIMATED) from age 65

ROYAL LONDON **Dundee Toys**
Company scheme £2,534.00 total **£78** monthly (ESTIMATED) from age 65

PHOENIX GROUP **Geopost (uk) Limited**
Company scheme £14,653.00 total **£78** monthly (ESTIMATED) from age 60

We have checked all providers. Do you think any of your pensions are missing? Check the status of all providers we've searched. [CHECK](#)

© ABI

Cyber resilience in pension schemes

- Pension schemes are potentially valuable targets for fraudsters as they hold large amounts of personal information
- Scheme managers are responsible for putting in place controls to ensure the security of data and assets
- TPR CEO has said that cyber should be on schemes' risk register
- Not just an administrator problem – (eg what controls are around the data shared with the scheme actuary, legal advisors and pension board)
- Not just about cyber 'defence' but cyber resilience:
 - look at systems, processes and people (access and training) to reduce the risk
 - prepare for when things go wrong – how to recover data, how to report internally and externally (members, ICO, TPR)

Mitigation against cyber threats

- Most cyber attacks exploit basic weaknesses in software and IT systems
- Government estimates that 80% of breaches could be prevented by following these ten steps
- National Cyber Security Centre (part of GCHQ):
 - 10 steps to cyber security

www.ncsc.gov.uk/guidance/10-steps-executive-summary
- Cyber Essentials is a Government-backed, industry-supported scheme to help organisations protect themselves against the most common threats found on the internet. It shows you how to fix basic weaknesses and get a good level of cyber security in place.

www.cyberaware.gov.uk/cyberessentials
- Prepare for GDPR – controls put in place will also help mitigate the cyber risk

Summary

- Our key focus areas are record-keeping and data quality
- Employers must provide accurate and timely data for record keeping
- Data quality to be continuously reviewed:
 - the reviews are sufficiently comprehensive
 - and robust data improvement plans are in place and progressed
- Good governance and administration - make sure there are appropriate controls:
 - service level agreements are set up, even with in-house administrators
 - processes around the Data Protection Act / GDPR
 - report breaches of the law when appropriate
- Additional scheme return requirements from 2018
- Scheme managers are responsible for having controls for cyber resilience
- Outsourcing does **not** reduce or remove a scheme manager's responsibility or accountability

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Useful tools, checklists and guidance (i)

- **Annual benefits statement** - www.tpr.gov.uk/docs/public-service-annual-benefit-statements-guide.pdf
www.tpr.gov.uk/docs/public-service-annual-benefits-statement-checklist.pdf
www.tpr.gov.uk/docs/PS-guide-key-information-to-provide-to-members.pdf
- **Data measuring guidance** - www.tpr.gov.uk/docs/measure-data-guide.pdf
- **GDPR guidance - Information Commissioner's Office (ICO)** - <https://ico.org.uk/for-organisations/guidance-index/>
- **Improvement plan guidance** - www.tpr.gov.uk/docs/improve-data-guide.pdf
- **Internal controls checklist** - www.tpr.gov.uk/docs/public-service-internal-controls-checklist.pdf

Useful tools, checklists and guidance (ii)

- **Public service - scheme self assessment toolkit -**
www.tpr.gov.uk/public-service-schemes/assess-your-scheme.aspx
- **Public service - personal self assessment tool -**
<https://education.thepensionsregulator.gov.uk/login/index.php>
- **Reporting a breach -**
www.tpr.gov.uk/docs/PS-reporting-breaches-examples-traffic-light-framework.pdf
- **Risk register example -**
www.tpr.gov.uk/docs/public-service-example-risk-register.pdf
- **Trustee Toolkit -** <https://trusteetoolkit.thepensionsregulator.gov.uk/>

Useful links

- **Our website** - www.tpr.gov.uk/
- **Codes** - www.tpr.gov.uk/doc-library/codes.aspx
- **Code of practice 14 - Governance and administration of public service pension schemes** - www.tpr.gov.uk/public-service-schemes/code-of-practice.aspx
- **Governance** - www.tpr.gov.uk/21c-trustee
- **Latest research** - www.tpr.gov.uk/public-service-schemes/research-and-analysis.aspx
- **NAO report** - www.tpr.gov.uk/docs/vfm-review.pdf
- **Pension scams** - www.tpr.gov.uk/pension-scams.aspx
- **Public service area** - www.tpr.gov.uk/public-service-schemes.aspx
- **TPR Future** - www.tpr.gov.uk/about-us/protecting-workplace-pensions.aspx

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Thank you

We are here to help!

Request a guest speaker:

<https://secure.thepensionsregulator.gov.uk/speaker-request.aspx>

Contact us at:

www.tpr.gov.uk/contact-us.aspx

Subscribe to our news by email:

<https://forms.thepensionsregulator.gov.uk/subscribe.aspx>



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Assessment

- How did your response measure against the national responses
 - How often do you self-assess?
 - What about peer review?
-



GDPR compliance for Fire & Police Authorities

Rebecca Morgan & Hannah Blomfield / 27 February 2018

Agenda

- / Introduction to ITM*
- / Overview of GDPR*
- / Where to start – practical steps*
- / Records of Processing Activities (ROPA)*
- / How ITM can help*
- / Example data mapping report*

1. Introduction to ITM

A background photograph of a business meeting. In the foreground, a man with glasses and a blue checkered shirt is shown in profile, looking towards the left. In the background, two other men in suits are seated at a table, also looking in the same direction. The room has a modern, bright atmosphere with circular recessed lights in the ceiling.

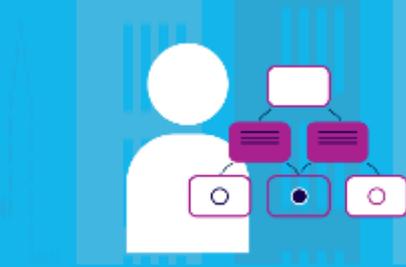
*15 years
helping clients
improve pensions
administration
through better
management of
data and systems*

ITM – Administration and Data Management Project Support Partner



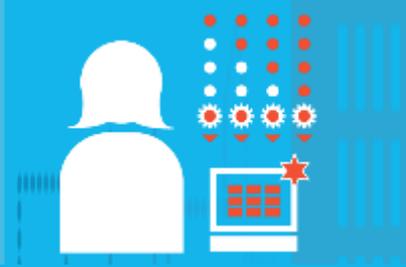
Pension funds

De-risking, data & benefit
audit, cleanse, TPA risk
review, AE audit, and
GMP reconciliation



Financial institutions

Systems migration and
rationalisation, asset
consolidation and auto
enrolment



Administrators

Data quality
assessment, process
review, systems build
and resource services

Our services

1 Service overview:



Data cleansing, data analysis and record keeping advice



Administration backlogs



Data risk and benefit audits and compliance



GMP reconciliation



System rationalisation



Technical and legislative support and advice



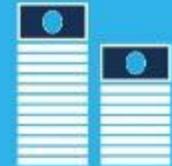
Data migration and document archiving



De-risking exercises, including Triv Comm and PIE



Pension Dashboard developer



Pensions and asset consolidation

Our software

ITM's eSuite of software products provide a complete end-to-end web based pensions administration solution and can easily integrate with other software.

Clients can mix-and-match software to meet their specific data and administration needs. We also offer bespoke data systems with flexible pricing and support models.

- **PenScope** – pension administration record keeping and automation solution
- **eMember** – responsive member self service and engagement
- **ePortal** – streamlining – interfacing between schemes and employers
- **eAsE** – Auto Enrolment software for assessment, communications and payroll
- **eDAaRT** – flexible data tool for TRP data audits, cleanses and migrations
- **Case Manager** – flexible case file framework

Our clients: Private sector



Our clients: Public sector



Our clients: Financial services



Our clients: Administrators

CIVICA

NOW:
Pensions

Pension
Protection
Fund



CAPITA 

t|p|t
Retirement Solutions

HYMANS 
ROBERTSON

LCP INSIGHT
CLARITY
ADVICE


Punter Southall

Liberata


Willis Towers Watson

Our clients: Professional Services


EY Building a better
working world


Aquila Heywood

accenture

ORACLE®

The Pensions
Regulator 


Johnson Matthey


WIPRO
Empowering
Thought

Law Debenture

2. GDPR Quiz!

*Q1: Administrators are responsible for sorting out GDPR
– fire authorities can relax.*

True or false?

Q2: GDPR applies only to records held on a computer

True or false?

Q3: You must delete a member's data if they ask you to do so

True or false?

Q4: When a member transfers out you no longer need the data relating to that individual. You must therefore delete it all.

True or false?

GDPR Quiz

Q5: There are multiple archive boxes in storage and their contents is unknown. If unauthorised access to these boxes occurs, this is a data breach as the boxes may contain personal data.

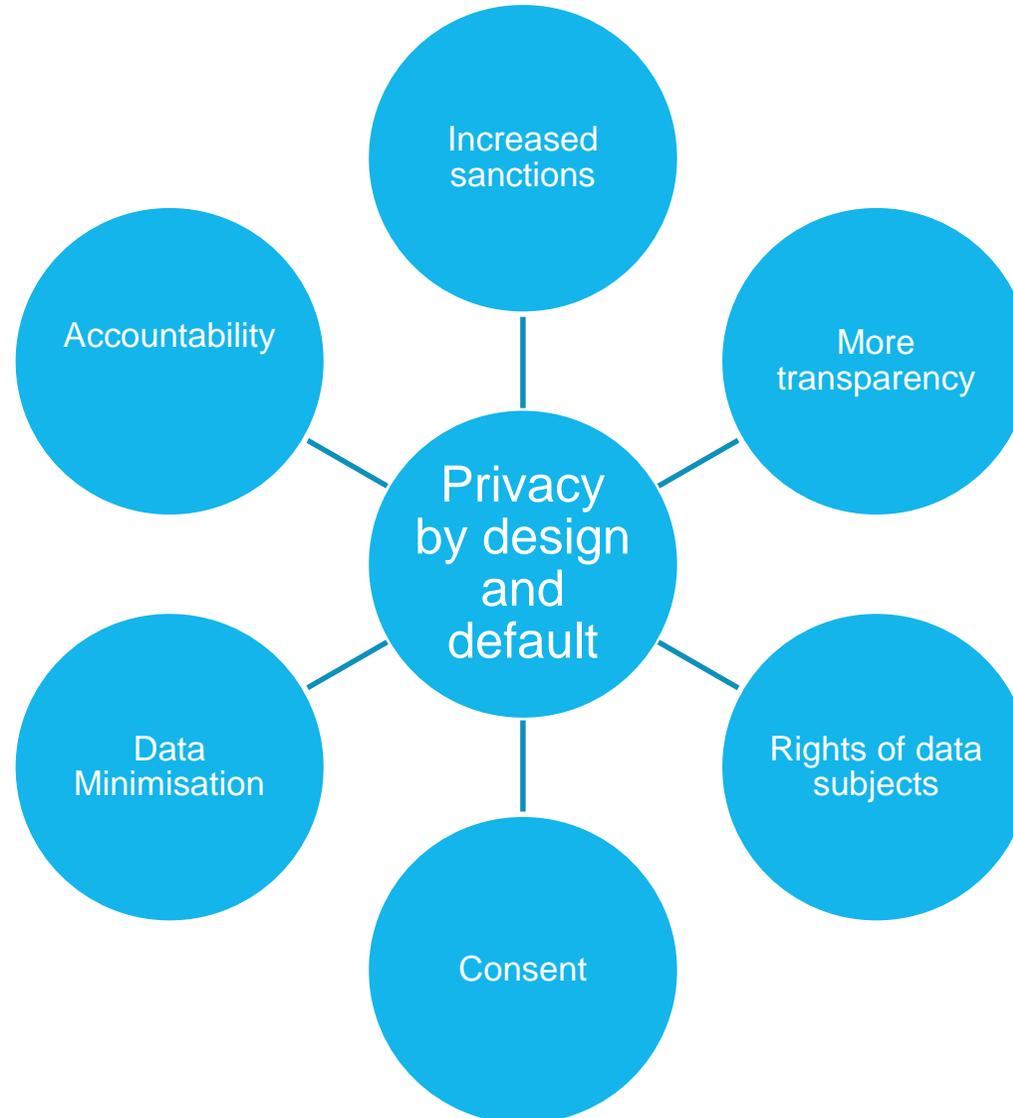
True or false?

3. Overview of GDPR

General Data Protection Regulation

A new data protection framework has been adopted by the EU
and will be implemented by all member states
without the need for national legislation
from 25 May 2018

New focus in DP principles



4. Where to start?

Practical steps in response to GDPR for
Fire and Police Authorities

How to get started

- Map your data
- Identify risks
- Action plan

Records of Processing Activities

Processing details									
Who processes the data?	Processor or controller?	What personal data do they hold?	Why are they using the data?	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?

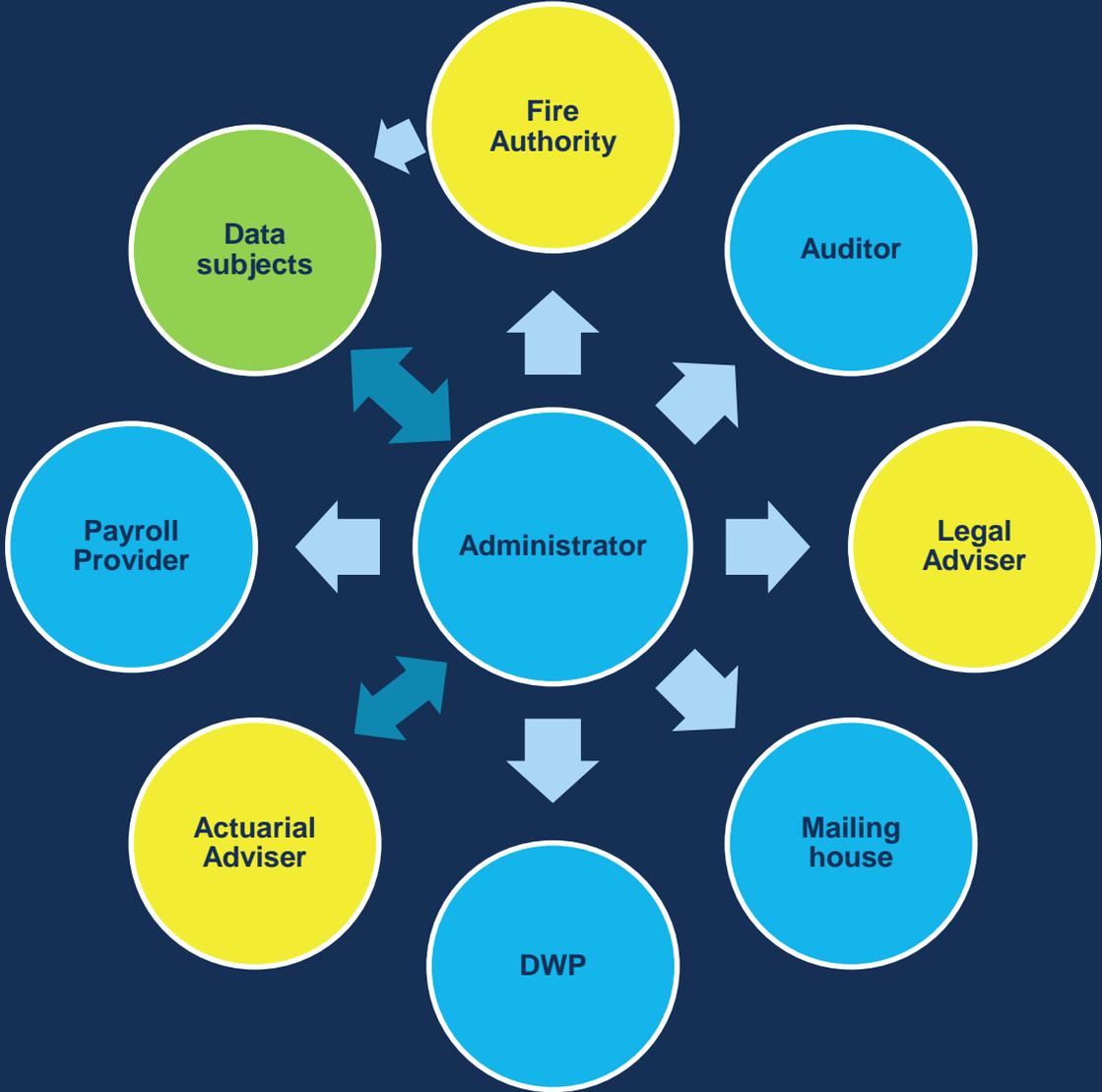
Who is processing your data?



Records of Processing Activities

Processing details									
Who processes the data?	Processor or controller?	What personal data do they hold?	Why are they using the data?	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Fire Authority									
Fire Authority									
Fire Authority									
Administrators									
Administrators									
Auditor									
Actuary									
Legal Advisers									
IFAs									

Example data parties



Records of Processing Activities

Processing details									
Who processes the data?	Processor or controller?	What personal data do they hold?	Why are they using the data?	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Fire Authority	Controller								
Fire Authority	Controller								
Fire Authority	Controller								
Administrators	Processor								
Administrators	Processor								
Auditor	Processor								
Actuary	Joint Controller								
Legal Advisers	Joint Controller								
IFAs	Processor								

What personal data is held?

<i>Names</i>	<i>ID numbers</i>	<i>Gender</i>	<i>Medical records</i>
<i>Dates of birth</i>	<i>Criminal records</i>	<i>Contact details</i>	<i>Salaries</i>
<i>Pension payments</i>	<i>Marital status</i>	<i>Dependants' details</i>	<i>Service dates</i>
<i>Employment history</i>	<i>Bank details</i>	<i>Benefits</i>	<i>Contributions</i>

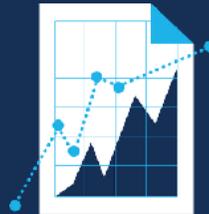
Records of Processing Activities

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Fire Authority	Controller	Member data							
Fire Authority	Controller	Contact details							
Fire Authority	Controller	Contact details							
Administrators	Processor	Names, DOB, gender, contact details, service dates, salaries, benefits							
Administrators	Processor	Special categories of data - medical records, sexual orientation							
Auditor	Processor								

What is data being used for?



*Scheme
administration*



*Actuarial
valuations*



*Preparing
accounts*



*Providing
legal advice*



*Exercising
discretionary powers*

Records of Processing Activities

Processing details									
Who processes the data?	Processor or controller?	What personal data do they hold?	Why are they using the data?	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Fire Authority	Controller	Member data	Scheme administration						
Fire Authority	Controller	Contact details							
Fire Authority	Controller	Contact details							
Administrators	Processor	Names, DOB, gender, contact details, service dates, salaries, benefits	Scheme administration						
Administrators	Processor	Special categories of data - medical records, sexual orientation	Ill-health retirements, nomination forms						

Who are the data subjects?

*Active
members*

Pensioners

*Potential
beneficiaries*

*Local
Pension Board*

*Deferred
pensioners*

*Former
members*

Ex-spouses

Advisers

Issues in respect of former members

- / How long should data be kept?*
- / Transfers out / refunds*
- / Dependants*
- / What data do you actually need?*
- / Practicalities of deleting data*

Records of Processing Activities

Processing details									
Who processes the data?	Processor or controller?	What personal data do they hold?	Why are they using the data?	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Fire Authority	Controller	Member data	Scheme administration	Scheme members					
Fire Authority	Controller	Contact details		Advisers					
Fire Authority	Controller	Contact details		Local Pensions Board					
Administrators	Processor	Names, DOB, gender, contact details, service dates, salaries, benefits	Scheme administration	Active members, deferred members, pensioners, former members, potential beneficiaries, ex-spouses					
Administrators	Processor	Special categories of data - medical records, sexual orientation	Il-health retirements, nomination forms						

Where is data held?



*Laptops/
devices*



Network



*Paper
records*



*Meeting
papers*



*USB
sticks*



Microfiche



Database



*Cloud based
storage*



Emails

Records of Processing Activities

Processing details									
Who processes the data?	Processor or controller?	What personal data do they hold?	Why are they using the data?	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Fire Authority	Controller	Member data	Scheme administration	Scheme members	Email, paper records				
Fire Authority	Controller	Contact details		Advisers	Email, paper records				
Fire Authority	Controller	Contact details		Local Pensions Board	Email, paper records				
Administrators	Processor	Names, DOB, gender, contact details, service dates, salaries, benefits	Scheme administration	Active members, deferred members, pensioners, former members, potential beneficiaries, ex-spouses	Admin database, microfiche, cloud, paper records				
Administrators	Processor	Special categories of data - medical records, sexual orientation	Ill-health retirements, nomination forms		Admin database, microfiche, cloud, paper records				

Who is the data shared with and how?

Document all data flows

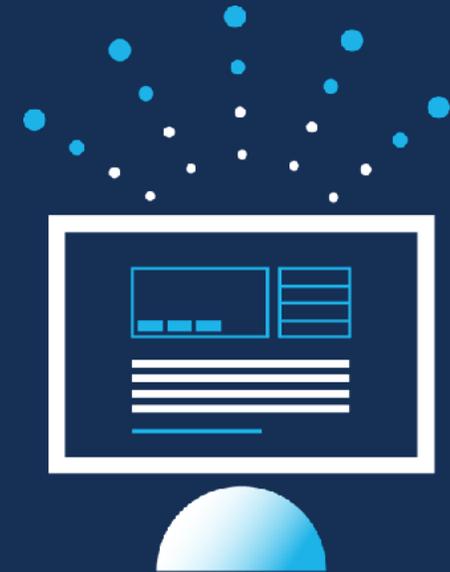
/ Think about how data is shared and whether it's secure

/ Is data transferred outside the EEA?

/ Are there alternatives?

/ Administrator will typically provide data to many advisers

/ Also focus on “multiple services” providers

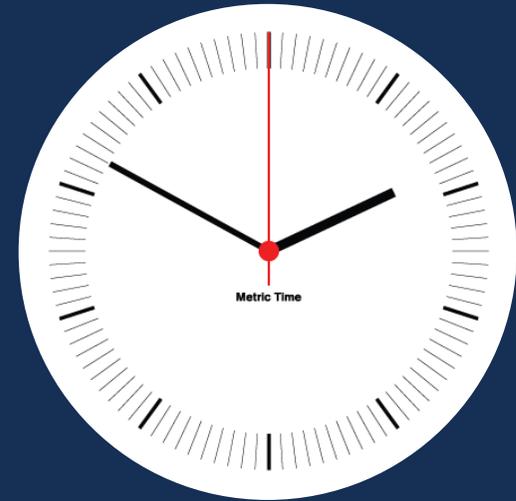


Records of Processing Activities

Processing details									
Who processes the data?	Processor or controller?	What personal data do they hold?	Why are they using the data?	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Fire Authority	Controller	Member data	Scheme administration	Scheme members	Email, paper records	Administrators	No		
Fire Authority	Controller	Contact details		Advisers	Email, paper records	No	No		
Fire Authority	Controller	Contact details		Local Pensions Board	Email, paper records	No			
Administrators	Processor	Names, DOB, gender, contact details, service dates, salaries, benefits	Scheme administration	Active members, deferred members, pensioners, former members, potential beneficiaries, ex-spouses	Admin database, microfiche, cloud, paper records	Fire Authority, Actuary, Legal Advisers, IFAs, etc	No		
Administrators	Processor	Special categories of data - medical records, sexual orientation	Il-health retirements, nomination forms		Admin database, microfiche, cloud, paper records		No		

How long is the data kept?

- / Contractual data retention requirements*
- / Ask to see each party's general policy on data retention and data destruction*
- / How has data been destroyed?*
- / Are former advisors deleting ALL data when contracts are terminated?*
- / Example – “peripheral data” like emails, meeting papers*
- / Example – backups*



Records of Processing Activities

Processing details									
Who processes the data?	Processor or controller?	What personal data do they hold?	Why are they using the data?	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Fire Authority	Controller	Member data	Scheme administration	Scheme members	Email, paper records	Administrators	No	Lifetime of scheme	
Fire Authority	Controller	Contact details		Advisers	Email, paper records	No	No		
Fire Authority	Controller	Contact details		Local Pensions Board	Email, paper records	No			
Administrators	Processor	Names, DOB, gender, contact details, service dates, salaries, benefits	Scheme administration	Active members, deferred members, pensioners, former members, potential beneficiaries, ex-spouses	Admin database, microfiche, cloud, paper records	Fire Authority, Actuary, Legal Advisers, IFAs, etc	No	Lifetime of scheme	

Is data secure?

/ Pseudonymisation / encryption

/ Is security regularly tested?

/ How quickly can data be restored?

/ Consider less obvious data repositories

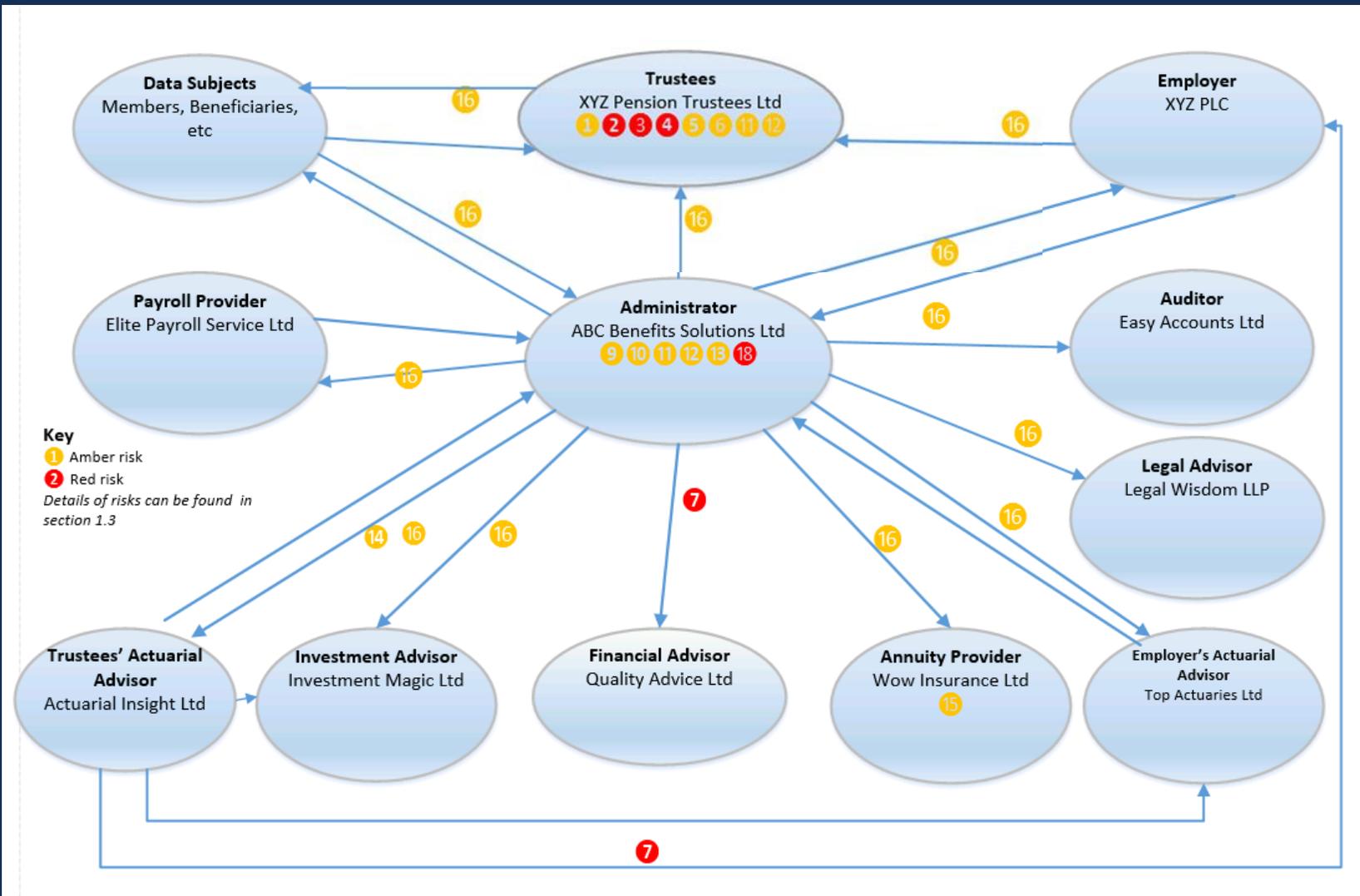
/ Relevant accreditations

/ Ask to see each processor's security policy

/ Don't forget data held directly by the Fire or Police Authority



Data map and risk assessment



Example of risks associated with data held by the Fire or Police Authority

Risk Id	Parties involved	Findings	Risk in relation to GDPR
1	Fire Authority	Data stored on personal laptops	Unauthorised access to personal data
2	Fire Authority	Laptops not encrypted/password protected	If laptop is hacked/stolen it could lead to unauthorised access to personal data
3	Fire Authority	Member data stored on USB flash drives	If USB is lost could lead to unauthorised access to personal data
4	Fire Authority	Historic paper records stored at an employee's home	Papers could be stolen or lost
5	Fire Authority	Pensions Board receive hard copies of meeting papers	Meeting papers could fall into the wrong hands

Example of risks associated with data held by the administrator (1)

Risk Id	Parties involved	Findings	Risk in relation to GDPR
6	Administrator	All employees have access to database	Rogue employee steals/amends data
7	Administrator	Legacy data not indexed	Uncertainty as to what data is held
8	Administrator	Inaccurate data - examples reported by pensions manager	Processing carried out on inaccurate data
9	Fire Authority/ Administrator	Special categories of data held	Risk that member consent may be required / not obtained
10	Administrator	Breach in last 12 months – not reported to trustees	Breach reporting policy not GDPR compliant
11	Administrator/ Actuary	Full data set currently sent by email in unencrypted format	Risk of data being intercepted resulting in unauthorised processing

Example of risks associated with data held by the administrator (2)

Risk Id	Parties involved	Findings	Risk in relation to GDPR
12	Administrator	Address tracing not carried out in recent years	Inaccurate data
13	Administrator	Existence checks not carried out in recent years	Inaccurate data
14	Administrator / Scheme Actuary	Full services provider sharing data between admin and actuarial services	Data not being used for intended purpose
16	Administrator	Historic data held in respect of bulk transfer out of scheme	Data held that is no longer required
17	Administrator	Administration system uses cloud technology	Processing outside EEA may not be GDPR compliant
18	Former Administrator	Personal data retained beyond terms of contract	Data held that is no longer required

5. How can ITM help?

GDPR Data Mapping Information Audit

Phase 1:

GDPR Data Mapping Information Audit

- ✓ Data Map of all parties processing pension fund data including flows of data between parties
- ✓ Initial assessment of GDPR compliance and risks for each party
- ✓ Identification of areas where more detailed assessment beneficial

Phase 2:

GDPR Detailed Assessment

- ✓ Deep dive and challenge assessment in respect of specified parties

Phase 3:

Final Assessment

- ✓ Evidence checking of Phase 2 and final conclusion report in respect of specified parties

How can ITM help?

1. GDPR Data Mapping Information Audit

- Data Map of all parties processing pension fund data including flows of data between parties
- Initial assessment of GDPR compliance and risks for each party
- Identification of areas where more detailed assessment beneficial

2. GDPR training

- Half-day training session on GDPR

3. Data protection policies

- Template policy documents with drafting notes

Thank you

For more information please contact:

Rebecca Morgan

020 7648 9696

rebeccamorgan@itmlimited.com

Hannah Blomfield

020 7648 9091

hannahblomfield@itmlimited.com



Role of the S.A.B.

- **To provide advice, on request, to the Secretary of State on the desirability of making changes to the Firefighters' Pension Schemes**
- **To provide advice to Scheme Managers and Local Pension Boards in relation to the effective administration and management of the Firefighters' Pension Schemes**
- **To, where appropriate, offer advice to the Secretary of State in relation to matters not constituting a request.**

➤ **SAB sub-committees**

- **Cost management and effectiveness**
- **Administration and Benchmarking**
- **Effectiveness of local pension boards**

<http://www.fpsboard.org/index.php/board-committees>

➤ **Delivered in last two years**

- **Tax awareness sessions**
- **Independent actuarial review of 2016 assumptions**
- **Consultation response on valuation items**
- **Local Pension Board Training and tools**
- **29 Local Pension Board Training Sessions**
- **National websites**
- **2 day annual meetings**
- **Technical seminars**

- **Engagement - Just a snapshot**
 - **Meeting Police and Fire minister**
 - **Board training sessions and meetings**
 - **Technical groups and regional groups**
 - **Industry events**
 - **Engagement with third party administrators**
 - **Software supplier meetings**
 - **Dashboard meetings**

➤ **Communications**

- **SAB board website – www.fpsboard.org**
- **FPS Regulations website – www.fpsregs.org**
- **Further website development to come**
- **LGA Monthly bulletins**
- **LPB Board Survey**
- **ABS survey**
- **Communications working group**

Local Pension Boards



Who's Who

Pension Board



- Assist Scheme Manager
- Ensure Compliance
- Ensure efficiency & effectiveness of administration
- Advise on member communications
- Monitor complaints

Scheme Manager

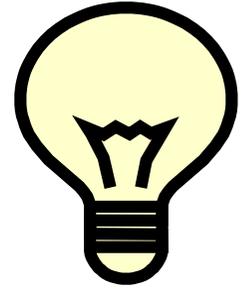


- Administer schemes
- Make scheme decisions
- Issue Communications
- Publish data
- Auditing
- IDRPs

Scheme Advisory Board



- Advise Secretary of State on request of desirability to change of scheme rules
- Cost Cap/Valuation
- Support LPB's
- Benchmarking
- Oversee standards
- Strategic communications



Roles and Responsibilities

- Required by legislation to
 - Secure compliance with
 - (a) regulations and
 - (b) requirements imposed by the pensions regulator
 - To ensure the effective and efficient governance and administration of this scheme and any connected scheme
-

Board Members Responsibilities

- Notify Scheme Managers of Conflict of Interest
 - Keep Code of Conduct
 - Comply with TPR Code of Practice
 - Report Breaches of Law
 - Gain knowledge and Understanding
 - Assist Scheme Manager
-

Scheme Manager Responsibilities

- Benefits and the Payment of Benefits
 - Decisions and Discretions
 - Disclosure of Information
 - Record Keeping
 - Internal Controls
 - Internal Dispute Resolution
 - Report Breaches of Law
 - Statements, Reports and Accounts
-

Public Service Governance and Administration Survey 2016

		Fire	Police	LGPS	Other
1	Survey response rate	98%	76%	90%	100%
2	Conflicts policy and procedure for pension board members	80%	71%	85%	100%
3	Register of interests	86%	74%	87%	100%
4	Knowledge and Understanding arrangements	94%	89%	93%	100%
5	Frequency of scheme manager attendance at pension board meetings	68%	43%	86%	82%
6	Procedures for assessing and managing risk	44%	51%	92%	91%
7	Risk register	38%	51%	91%	91%
8	Where risk management procedures have contributed significantly to new or revised internal controls	14%	28%	29%	20%
9	Where administration is delivered in-house	24%	20%	73%	36%
10	Employers providing timely, accurate and complete data	58%	63%	7%	9%
11	Data review within the last 12 months	68%	77%	83%	100%
12	Data review covering both before and after 1 April 2015	68%	61%	76%	91%
13	Where data review identified any issues or problems	45%	52%	66%	100%
14	All annual benefit statements received by statutory deadline	32%	54%	45%	36%
15	Average number of complaints entering IDRPs	48%	44%	38%	60%
16	Procedures in place to identify, assess and report breaches of the law to TPR	78%	69%	91%	100%
17	Proportion that had identified any breaches of the law in the past 12 months	58%	11%	45%	64%
18	Proportion of reported breaches that were thought to be materially significant	38%	9%	15%	45%
19	Frequency of visiting TPR web site	60%	29%	61%	73%
20	Proportion judging TPR to be effective	82%	74%	85%	82%

Top 4 areas of Improvement

Risk

- Procedures for Assessment and Management
- Risk Register

Internal Controls

- Systems, arrangements and procedures for managing and monitoring the management of the pension scheme
- Managing risk
- Identifying and reporting breaches of law
- Controls around administrators

Effective Scheme Manager Delegation

- Accountability
- Management of delegation

Communications

- Annual Benefit Statements
- Provision of Information to Members

Risk

Regulatory and Compliance	Financial	Operational
Non compliance with TPR	Excessive Charges	Member Data
Failure to interpret regulations	Pension Fund accounting mistakes	Administrative failures
Failure to comply with disclosure requirements	Authority costs due to failure to apply scheme / tax rule correctly	Premises
Failure to communicate with scheme members	Failure to deduct correct employee contributions	Software
	Fraud	Workforce planning

TPR – Example Risk Register

Public Service toolkit downloadable

Example risk register

Risk area 1 – Operations	Likelihood (1: least likely, 10: most likely)	Impact (1: least likely, 10: most likely)	Score (likelihood x impact)	Control	Owner	Test	Next review	Comment
Operational disaster (fire/flood etc)	1	6	6	Business continuity procedures in place for administrator	Scheme manager	Annual	Q1 Y2	Up-to-date business resiliency programme provided by administrator as at 01/01 Y2, reviewed by scheme manager at meeting in Q1 Y2
				Business continuity plans in place for scheme manager	Scheme manager	Annual	Q2 Y2	Documented programme in place to ensure continuity will be provided by pension finance manager to scheme manager in time for quarterly meeting in Q2 Y2
				Contracts with all advisers and suppliers are recorded on central database	Pension finance manager	Annual	Q1 Y3	Contracts held in hard copy in safe, and electronically in secure area of scheme management intranet. Checked by pension finance manager January Y2
Member data incomplete or inaccurate	5	7	35	Annual report from administrator, used as basis for rectification plan	Scheme manager	Annual	Q3 Y2	Initial rectification plan completed Q3 Y1. New report received from administrator at Q1 Y2 meeting, revised rectification plan agreed with administrator. To review progress at Q3 quarterly meeting
				'Not known at this address' returns from annual statements checked by tracing agency	Pension administrator	Annual	Q2 Y2	Details provided by administrator mid January Y2, passed to tracing agency at end of January. 25% traced by quarterly meeting in Q1, update will be provided to scheme manager for Q2 meeting
Administration process failure/maladministration	4	8	32	Formal agreement in place with administrator, including SLAs	Pension finance manager	Annual	Q1 Y3	Last reviewed Q2 Y1, three year agreement
				Authority levels clearly agreed and kept up-to-date	Scheme manager	Annual	Q2 Y2	Last reviewed Q2 Y1
				Review Independent audit reports of administrator's processes	Scheme manager	Annual	Q2 Y2	AAF01/06 held by administrator as at DD/MM/YYYY
				Ongoing dialogue with third party administrator	Pension administration manager	Ongoing	Q2 Y2	Weekly phone calls between pension administrator manager and third party administrator, plus ad hoc calls when necessary
				Written reports and quarterly presentations by administrator to scheme manager	Scheme manager	Quarterly	Q2 Y2	Next report from administrator due two weeks before quarterly meeting

[TPR - example](#)

[Fire example](#)

Risk is a driver for improvement



TPR Assessment Tool

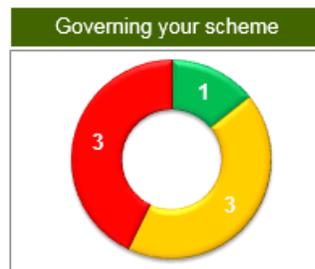
Results

Using this report

In this report we have provided an indicative risk rating for each answer you selected, alongside some guidance and links to additional information. This report does not provide an assessment of compliance with the law – it indicates areas that might be of particular concern and where you may wish to focus. You should seek legal advice where required.

To minimise the risk of non-compliance with the law, you should conduct a comprehensive review of your scheme against the requirements set out in the legislation and the guidance provided in our code of practice. Statistics refer to findings from TPR's 2015 survey into the Governance and Administration of Public Service Schemes.

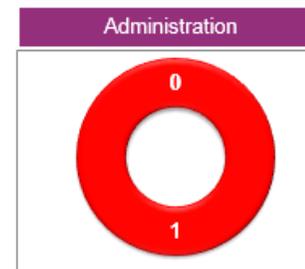
A summary of your results



Percentage of questions answered: **88%**



Percentage of questions answered: **17%**



Percentage of questions answered: **13%**

How are you doing?

	Governing your scheme	Managing risks and issues (internal controls)	Administration
Low			
Medium			
High			

Reporting and recording breaches

Potential investigation outcomes				
	Cause	Effect	Reaction	Wider implications
Red	Pension board members have failed to take steps to acquire and retain the appropriate degree of knowledge and understanding about the scheme's administration policies	A pension board member does not have knowledge and understanding of the scheme's administration policy about conflicts of interest. The pension board member fails to disclose a potential conflict, which results in the member acting improperly	Pension board members do not accept responsibility for their failure to have the appropriate knowledge and understanding or demonstrate negative/non-compliant entrenched behaviours The scheme manager does not take appropriate action to address the failing in relation to conflicts	It is highly likely that the scheme will be in breach of other legal requirements. The pension board do not have an appropriate level of knowledge and understanding and in turn are in breach of their legal requirement. Therefore, they are not fulfilling their role to assist the scheme manager and the scheme is not being properly governed
Amber	Pension board members have gaps in their knowledge and understanding about some areas of the scheme's administration policies and have not assisted the scheme manager in securing compliance with internal dispute resolution requirements	Some members who have raised issues have not had their complaints treated in accordance with the scheme's internal dispute resolution procedure (IDRP) and the law	The scheme manager has failed to adhere precisely to the detail of the legislation where the breach is unlikely to result in an error or misunderstanding or affect member benefits	It is possible that the scheme will be in breach of other legal requirements. It is possible that the pension board will not be properly fulfilling their role in assisting the scheme manager
Green	Pension board members have isolated gaps in their knowledge and understanding	The scheme manager has failed to adhere precisely to the detail of the legislation where the breach is unlikely to result in an error or misunderstanding or affect member benefits	Pension board members take action to review and improve their knowledge and understanding to enable them to properly exercise their functions and they are making quick progress to address gaps in their knowledge and understanding. They assist the scheme manager to take prompt and effective action to remedy the breach	It is unlikely that the scheme will be in breach of other legal requirements. It is unlikely that the pension board is not fulfilling their role in assisting the scheme manager

Breach Assessment



Breach Assessment Template

Date of assessment

[Enter text about date of assessment and who assessment panel is]

Introduction

[Brief introduction to the breach being assessed]

Identified

[Enter text about how the breach was identified, for example it might be

- Tracked from agenda
- Tracked from LGA bulletins / technical note
- Informed by scheme manager / Pensions administrator
- Something else]

Assessment

[Using the [TPR guidance](#) comment on the four areas and score red, amber or green

	Cause	Effect	Reaction	Wider Implication
Red				
Amber				
Green				

Action

[Enter text about what the course of action is in response to the breach, including any timescales.]

Decision

Report as material breach	
Recorded as breach	

Assessed by:

Date of assessment:

Board Review:

Tabled at Board Meeting:

Agreed by board:

Draft

Scheme Manager

- Who is the Scheme Manager
 - Powers of delegation
 - To delegate or not to delegate!
 - Who to delegate to?
-

Scheme Manager

- The Scheme Manager is defined by rule 4 of the 2014 regulations as being the Fire and Rescue Authority as determined under section 1 of the Fire and Rescue Services Act 2004
 - By virtue of regulation 4, the Fire and Rescue Authority is the scheme manager of the 2015 scheme and ‘any statutory scheme that is connected with it’
 - <http://www.legislation.gov.uk/ukxi/2014/2848/regulation/4/made>
-

Power of delegation

- *(2) The scheme manager may delegate any functions under these Regulations, including this power to delegate, to such persons or employees of such person as may be authorised in that behalf by the scheme manager.*
 - <http://www.legislation.gov.uk/uksi/2014/2848/regulation/5/made>
-

To delegate or not to delegate

Does this naturally fall within the Chief Fire Officers responsibilities

- Is this part of the senior management team reports to the Chief?
- Does the chair of the board have regular meetings with the Chief Fire Officer?
- Time pressures on Chief Fire Officers likely to have an affect.
- Is there a natural home for pensions within your organisation?

Who owns pensions

- Are elected members clear on their pensions responsibilities
- Are the senior management team clear on their pension responsibilities

Risks of not delegating?

- Findings against the authority by The Pensions Ombudsman
- Financial risks of pension fund mistakes
- Section 89 report from TPR

Who to delegate to?

Section 151 Officer?

Pension Committee?

Scheme Manager
Delegation

HR Director?

Finance Director?

Who it's not!

- Pension Scheme Administration Manager
 - Junior Officer
-

Internal Controls

- Checklist
 - Questions for boards
-

ACTION	NOTES	YES/NO
Do you have effective arrangements and procedures to ensure that the pension scheme is being run in accordance with the scheme rules and requirements of law?	See paragraphs 94-112 in the code at www.tpr.gov.uk/code14 . Consider if you need to put further arrangements and procedures in place.	
Do you regularly review the arrangements and procedures?	If yes, how often?	
Do you have a process to identify risks?		
Do you have a process to evaluate risks?		
Do you have in place processes or controls to manage risks?		
Do you have a risk register to record all risks identified and action taken?		
Do you regularly review the risk register?	If yes, how often?	
Do you have a standing item on the pension board agenda to review scheme risks?		

Internal Controls

Scheme Manager Engagement

- Can you identify who is the delegated scheme manager
- Does the scheme manager regularly attend board meetings?
- Does the chair of the board have regular meetings with the scheme manager
- Are there barriers to the above?

Arrangements and Procedures for administration and scheme management

- Are they the same thing?
- Who is responsible for managing the scheme, does that include administration?

Who monitors?

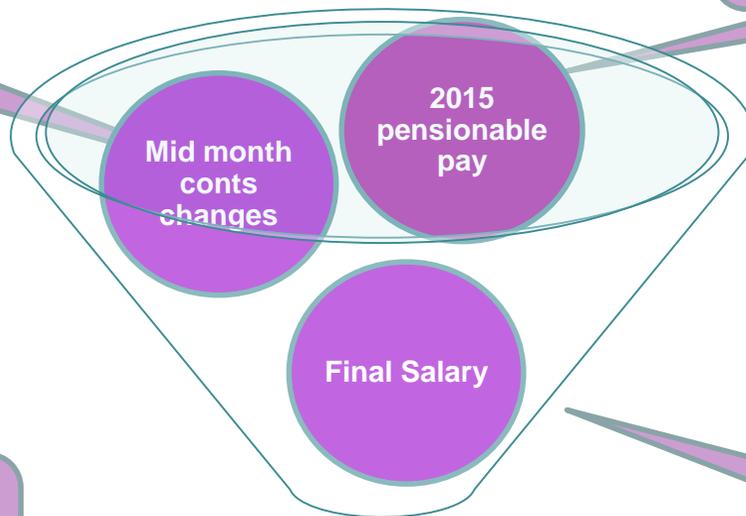
- Does the 'scheme manager' get reports
 - Does the scheme manager report to the Chief Fire Officer?
 - Does the chief report to the authority?
 - What escalation procedures are there?
-

Communications

- High on TPR agenda
 - Challenge – how to reconcile statutory obligations and retirement planning
 - Technology?
-

Record Keeping?

Inputs



Change of contribution rate for mid month tapering

CARE pensionable pay for scheme year

Mid month conts changes

2015 pensionable pay

Final Salary

Link to final salary for transitional benefits

Correct pension

Outputs



2015 Scheme Pension Pot - Example

Date from	Date to	Account Balance	Reval rate	Opening Balance	Actual Pay	Pension Build Up	Closing Balance
01/04/2015	31/03/2016	£0.00		£0.00	£29,850	£500	£500
01/04/2016	31/03/2017	£500	2%	£510	£30,500	£510.89	£1020.89
01/04/2017	31/03/2018	£1020.89	2.6%	£1047.43	£32,000	£536.01	£1,583.44
01/04/2018	31/03/2019	£1,583.44	2%	£1615.11	£32,700	£547.74	£2,162.85
01/04/2019	31/03/2020	£2,162.85	4%	£2249.37	£33,600	£562.81	£2,815.18
01/04/2020	31/03/2021	£2,815.18	1%	£2840.30	£35,000	£586.26	£3426.57
01/04/2021	31/03/2022	£3426.57	3%	£3529.36	£35,900	£601.34	£4,130.70
01/04/2022	01/04/2023	£4,130.70	2%	£4213.32	£36,500	£611.39	£4,824.71

TPR quick guides

- Record keeping [link](#)
 - Improving your data [link](#)
 - Measuring your data [link](#)
-

Health Check

Actions for boards

- Risk Register
 - Breaches Policy
 - Internal Controls – questions for boards
 - Scheme Manager Delegation is it working for you?
 - Data –does your board have answers to key questions?
 - Review key processes and documents – nomination and selection policy
 - Training, what works for you?
-

What's on your agendas?

Recommended Agenda items

- Latest bulletin
 - Events
 - Survey responses
 - Consideration of Breaches
 - Scheme Manager Report
 - Updates on
 - Reconcilliation
 - GDPR Processes
 - ABS cycle
 - Recommended actions in bulletin
-

Reporting

What makes a good report

- **Membership and meetings of board**
 - **Local arrangements**
 - **Board assessments**
 - **Identified Risks and Mitigation**
 - **Recorded Breaches**
 - **Data Review**
 - **Annual Workplan and reviews**
 - **Training**
 - **Expenses and Costs**
 - **Recommendations**
-

Update on current and future issues

Current/Future Issues

- 2017 amendment orders
 - Employer duty to provide information on tax
 - Annual Allowance & Lifetime Allowances
 - Scheme Reconciliation
 - Survivor benefits – Court judgments
 - Exit Cap
 - Dashboards
-

2017 amendment orders laid

- Survivors benefits
- Minor 2015 scheme amendments

[Technical note](#) published 17 September 2017

PPA - Ombudsman

- [Ombudsman's Determination PO-7096](#)
 - Employer of a member with a PPA should have provided information about the possible adverse tax consequences of becoming re-employed after starting to receive his pension.
-

Other effects

- The effect of the determination is that Pension Boards and Scheme Managers should ensure that information on important tax changes is provided to employees who are or may be affected by them.
 - This is not just in relation to protected pension ages, but with regards possible tax charges that may be applied on exceeding annual allowance or lifetime allowances
 - [Link](#) to Eversheds document this view was based on:
-

Taxation Changes

- Introduction of Tapered Annual Allowance
 - Lifetime Allowance
-

Scheme Reconciliation

- Common misnomer – GMP Reconciliation
 - New state pension to be introduced from 6 April 2016
 - HMRC shutting it's doors on contracted out data queries from December 2018 and will be writing to members after that date.
 - Foundation amount based on HMRC records of contracted out service and contributions
-

Reconciliation Stages

Stage 1

- Request HMRC Data and perform initial analysis

Stage 2

- Reconcile

Stage 3

- Update Scheme Data
-

GDPR

- From 25 May 2018 the EU General Data Protection Regulation (GDPR) introduces new legislation governing the collection, use, and processing of personal data.
 - The Information Commissioner's Office has prepared a [12 step guide](#) on actions that organisations should take in advance of the implementation date to ensure that they are compliant
-

Survivor benefits – Court Judgments

- Brewster – Nomination of cohabiting partner -
 - Walker – Same Sex marriage / Civil Partner Survivors pension
-

Exit Cap

- Enhanced Commutation
 - Authority initiated early retirement
 - Early retirement from the 2015 scheme is excluded in [draft regs](#)[3(2b)]
-

Government Pensions Dashboards

- Collaboration of largest pension providers to produce a prototype of a pensions dashboard
 - A platform to allow savers to view all their pension pots through a single portal.
 - The aim is for the dashboard to be launched in April 2019.
-

Government Pensions Dashboards

- Indications are that, for defined benefit schemes, the dashboard will show ‘most recent’ information on benefits, likely to be that contained in the last annual benefit statement.
 - Further information can be found on <https://pensionsdashboardproject.uk/>
-

Resources

- www.fpsboard.org
 - www.fpsregs.org
 - [Monthly bulletins](#)
 - [Local Pension Board Resources](#)
 - [SAB Minutes](#)
 - [Regulations](#)
 - [GAD Guidance](#)
-

Any questions





With thanks and credit to:

- AON
 - The Pensions Regulator
 - KPMG
 - ITM
 - Eversheds Sutherland
 - Nottinghamshire Fire & Rescue
 - Greater Manchester Fire & Rescue
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Disclaimer

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Thank you for listening

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