



Actions and agreements

11 December 2025

Location: Hybrid – In person and virtual meeting through Microsoft Teams

Chair

Joanne Livingstone	Scheme Advisory Board Chair	Present
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Scheme Member Representatives

Philip Hayes	Fire and Rescue Services Association (FRSA) - Standing member	Present
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Ade Robinson	Fire Officers Association (FOA) - Substitute	Virtual
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Des Prichard	Fire Leaders Association (FLA) - Standing member	Present
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Matt Cook	Avon Fire and Rescue Service - Observer	Virtual**
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Scheme Employer Representatives

Cllr Roger Hirst	Local Government Association - Standing member	Present
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Dawn Docx	NFCC Pensions Lead - Pending member	Present
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Martin Rehorn	Hereford and Worcester Fire and Rescue Service – Director of Finance and Treasurer - Pending member	Present
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Richard Welch	Avon Fire and Rescue Service – Assistant Chief Fire Officer – Pending member	Present*
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Advisors to the Board

Helen Scargill	Technical Advisor	Present
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Craig Moran	First Actuarial – Actuarial Advisor	Virtual
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James Allen	First Actuarial – Actuarial Advisor	Present
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Jane Marshall	DAC Beachcroft - Legal Advisor	Present
Secretariat		
Claire Johnson	Senior Firefighter Pension Advisor	Present
Tara Atkins	Firefighter Pension Advisor	Present
Jill Swift	Firefighter Pension Advisor	Present
Suzanne Williams	Firefighter Pension Programme Support Officer (minutes)	Present
Clair Alcock	Head of Pensions (LGA)	Present*
MHCLG		
Anthony Mooney	Speaker	Present
Government Actuary's Department		
Mike Scanlon	Speaker	Present
Brian Allen	Speaker	Present
Devolved Governments		
Karen Gilchrist	SPPA - Observer	Remote***

* Joined at 11.30

** Left meeting at 12.48pm for pre-arranged commitment

*** Left meeting at 14.21

1. Welcome, Apologies and Conflict of Interest

1.1 The Chair, Joanne Livingstone (JL) opened the meeting at 11.00 and confirmed that the Board was not quorate, requesting that any decisions or required input be sought from absent Board members.

ACTION 1.1: As a result of the Board not being quorate, any decisions or required input would be sought from absent members via email after the meeting.

1.2 JL welcomed Matt Cook (MC), who was attending to shadow Des Prichard (DP) ahead of DP's departure from the Board. JL thanked DP for his years of service and noted that he will be greatly missed.

1.3 JL welcomed everyone to the meeting and extended a particular welcome to Dawn Docx (DD), Richard Welch (RW), and Martin Rehorn (MR), who, subject to approval by the Secretary of State, will be joining the Board as employer representatives. As their appointments are not yet confirmed, she noted that they are not eligible to vote at this meeting.

1.4 She reported that no FBU representatives will be in attendance due to a scheduling conflict. Apologies have been received from Andrew Fox-Hewitt, Mark Rowe, Mark Stilwell, Cllr Leslie Byrom, Cllr Roger Philips, Cllr Roger Price, Tony Curry, Helen Fisher and Glyn Morgan, who is substituted by Ade Robinson.

1.5 A reminder regarding disclosure of conflicts of interest was raised, with the new Conflicts of Interest Policy scheduled for later discussion.

2. Actions arising (11 September 2025) and Chair's update.

2.1 JL provided an update on two recent meetings. First, JL met with the Chair of the Police Scheme Advisory Board to discuss governance approaches. They recently conducted a board effectiveness survey and may be able to share their template, subject to Home Office approval. JL noted such a survey would support good governance and help identify skill gaps.

2.2 JL also met with the Pensions Ombudsman (TPO) following concerns raised at the Local Pension Board (LPB) Chairs' Forum about increasing Internal Dispute Resolution Procedure (IDRP) cases. TPO is considering taking forward potential test cases relating to RSS's and contingent decisions. They asked to be informed if significant case volumes arise so they can plan resources.

2.3 DP raised concerns about retired members with unresolved calculations, highlighting the emotional and financial impact on those awaiting corrected pension figures. JL acknowledged this and noted that administrators had provided a report summarising current issues.

2.4 CJ noted that it would be helpful for the next SAB meeting to request that administrators provide a breakdown of the reasons why cases are not being processed.

ACTION 2.4: Local Government Association (LGA) to contact administrators with a request that they provide a breakdown of reasons why outstanding cases are not being processed, ahead of the next SAB meeting.

2.5 Members discussed wider concerns around delays affecting pensioners, noting complexities due to manual calculations, annual allowance corrections, and dependencies on software changes and external data. Helen Scargill (HS) explained that calculations often require multiple stages and additional data before progressing.

2.6 CJ reported that the LGA is scheduled to meet with West Yorkshire Pension Fund (WYPF) the following week to support them in developing a clear plan of action. She confirmed that the LGA will be facilitating an Oversight Board to oversee this work and meetings will commence in January 2026. The LGA will update the Board on the priorities agreed by the group.

ACTION 2.6: LGA to report back to SAB on the priorities agreed by the steering group.

2.7 The Board was advised that the minutes for the 11 September 2025 meeting have been circulated and comments were invited. No comments were received.

2.8 CJ provided an update on actions noted during the meeting held on 11 September 2025, highlighting those actions that remain outstanding.

2.9 Action 6.4 outstanding from the 19 March 2025 meeting – Mark Rowe (MR) and Andrew Fox-Hewitt (AFH) to provide information access requirements.

ACTION 2.9: Remind FBU that action 6.4 from 19 March 2025 meeting is outstanding.

2.10 Action 7.9 outstanding from the 11 September 2025 meeting - Board members to complete their training needs analysis by 30th September 2025 (LGA have sent out TNAs but only 3 completed TNAs received back).

2.11 Action 10.4 - Board members to ensure that they send apologies or send a substitute where appropriate.

ACTION 2.11: As the Board was not quorate at the meeting on 11 December 2025, it was agreed that the ability for members to send substitute representatives should be reinforced.

2.12 DP suggested that the minutes should clearly distinguish between standing Board members, substitutes, advisers, invited guests or speakers, and observers. It was agreed that this was a good suggestion.

ACTION 2.12: Minutes to clearly identify standing Board members, substitutes, advisers, invited guests or speakers, and observers.

2.13 JL provided a brief overview of the annual FPS Conference and highlighted the very positive feedback received.

3. MHCLG update

3.1 Anthony Mooney (AM) confirmed that the government response to the Matthews consultation had been published, with the amending regulations expected to come into force on 01 April 2026. He provided the Board with an overview of the amendments.

3.2 AM reported that work on the Matthews compensation arrangement, designed to address areas not covered by the main remedy, has progressed, and it is hoped that a final position with HM Treasury can be agreed in the new year. He noted that progress has been delayed due to the lack of clarification from HMRC on the spreading mechanism in relation to the Matthews Remedy. CJ added that HMRC had not responded to previous correspondence on this matter and asked whether it would be appropriate for the Board to write to HMRC to outline the sector's concerns.

- 3.3 DP asked about the intention behind the review of the Firefighters' Compensation Scheme. AM confirmed that MHCLG has commissioned the LGA to undertake the review, with the aim of assessing whether the current scheme remains fit for purpose for the modern workforce. He noted that recommendations are expected by the end of March 2026.
- 3.4 AM updated the Board that the contributions consultation response was published on 08 December 2025 and provided an overview of the key points, emphasising that changes are essential to keep the scheme sustainable, fair, and compliant with the Public Service Pensions Act 2013.
- 3.5 AM provided an update regarding the Sargeant Opt-Out issue. The working group meetings were reported to be extremely helpful. The goal is to secure a ministerial decision early in the new year, and the Board will be updated as soon as that decision is made.
- 3.6 JL highlighted the ongoing uncertainty surrounding the Sargeant opt-out issue and noted that the Board's letter to ministers had been positively received. AM confirmed that MHCLG is awaiting ministerial direction.
- 3.7 JL asked for clarity on the current approach to processing opt-outs. CJ advised that administrators may continue to process cases where members opted out after 1 April 2015 and did not subsequently re-join; all other cases should be held pending ministerial guidance.
- 3.8 HS outlined an example case that demonstrated the risk of incorrectly linking FPS 1992 and FPS 2006 benefits when this case was transferred to LPPA. She advised that a meeting with LPPA is planned to agree how such pending cases should be held until the legal position is finalised, as this will support consistent handling and avoid member detriment.
- 3.9 In relation to the member contributions update, Craig Moran (CM) asked whether any queries had been raised regarding the practicalities of implementing the move from wholetime equivalent pay to actual pay. CJ advised that a virtual meeting with payroll teams had been arranged for 16 December 2025 and confirmed that further clarity on implementation issues

was expected following that discussion. She noted that early feedback indicated payroll teams would require as much notice as possible to configure their systems to ensure members receive the best possible experience.

3.10 James Allen (JA) raised concerns around whether payroll teams would have enough time to update their policies in time for the changes to the member contribution changes.

3.11 JL suggested that information on payroll policies relating to contribution changes should be included in the letter to be issued to LPB Chairs.

Action 3.11 Include information on payroll policies relating to contribution changes in the letter to be sent to LPB Chairs.

3.12 CJ noted concerns that some Fire and Rescue Authorities (FRAs) share the same payroll provider, meaning their payroll policies would need to be aligned, depending on the level of flexibility available within the provider's systems. It was also noted that the main issue is determining the bands for retained firefighters.

3.13 HS stressed the need for a nationally consistent approach to contribution related payroll policies, noting that decisions must be documented and shared across the sector. This would ensure administrators have clear reference points, avoid unnecessary queries, and prevent inconsistencies arising from differing FRA decisions. CJ confirmed that this point could be reinforced in the letter to LPB Chairs.

4. Government Actuaries Department update

4.1 Mike Scanlon (MS) presented an update on the 2024 Valuation, including an overview of the progress made on the SAB engagement plan timeline, key changes and wider updates.

4.2 DP raised a concern that employer contribution rates are likely to increase, noting that this is primarily driven by the reduction in the SCAPE discount rate. It was highlighted that SCAPE is the single largest factor influencing

employer contribution outcomes. MS advised that he would be addressing these concerns later in his update.

4.3 MS noted two key technical changes in the draft valuation directions: deficits will now be spread using current payroll rolled forward, rather than projected workforce payroll, simplifying the process and likely reducing employer contribution pressure; and there will be additional flexibility on which minor assumptions must be analysed.

4.4 MS reported that data validation for the 2024 valuation is complete and no further queries will be issued to administrators. Work is now focused on assumption setting, with stakeholder discussions planned for February, March 2026, ahead of publishing the formal assumptions report in summer 2026. Indicative results are expected to be shared with SAB and FRAs in the second half of 2026, with final valuation results due in early 2027.

4.5 MS reported that core assumptions would be set, including those for SCAPE, short-term financial assumptions, long-term mortality trends, financial assumptions for pension increases, and long overall earnings growth.

4.6 MS confirmed that SCAPE remains the most influential factor and is expected to be reviewed by HMT at a fiscal event, likely the March Budget. Any resulting changes to employer contribution rates are expected to be managed through funding adjustments, consistent with previous valuations

4.7 CM asked about the expected lead in time ahead of the new employer contribution rate applying from 1 April 2027. MS confirmed that, although the final valuation results will be published in early 2027, indicative results will be shared with the Board and FRAs in the second half of 2026, allowing employers sufficient time to prepare for any changes. These indicative figures will reflect the results expected to appear in the final valuation documentation in time ahead of the new employer contribution rate applying from 1 April 2027.

4.8 Roger Hirst (RH) stressed the importance of using up to date, evidence-based assumptions given recent volatility. He raised concerns that funding

adjustments do not fully compensate FRAs for changes in employer contributions, creating financial pressure.

4.9 Dawn Docx (DD) raised the concern that different that FRAs are funded differently and may not receive full grant support for changes in employer contributions. She stressed the importance of receiving indicative valuation results as early as possible, ideally before September 2026, to support budget planning. MS reiterated that updated valuation directions will use current payroll rolled forward rather than projected workforce payroll and confirmed that decisions on employer contribution changes must balance alongside the cost control mechanism, which operates separately from the main valuation process.

4.10 Brian Allan (BA) presented an update on progress with the Matthews exercise, highlighting quarterly trends, overall progress to 30 September 2025, and the number of firefighters still awaiting statements.

4.11 BA provided an overview of the volume and types of manual cases remaining and noted that delays often arise where cases fall outside standard automated processes. GAD also outlined how FRAs are keeping pace with issuing expressions of interest and emphasised that while most cases can now be processed through the calculator, a small proportion of complex cases require additional technical development.

4.12 CJ noted that current monitoring only covers progress up to the point that members make an election, as this is where the regulatory deadlines apply. However, delays have been identified for individuals who have already made an election but are not yet in payment. She suggested that the Board may want to collect data on this in 2026.

ACTION 4.12: LGA to start collecting data from FRA's on individuals who may have already made an election but are not yet in payment in respect of Matthews and to share this data with the SAB.

4.13 HS requested that the Board notes that while the requests for data are understood, they place additional pressure on administrators, who must

divert time away from processing cases to produce the required information. Administrators also face significant expectations to make payments promptly once FRAs submit completed forms.

4.14 CJ responded by acknowledging these pressures and providing clarification about why it is important that Board has oversight of this information

4.15 The Board discussed ongoing challenges in using the GAD calculator, noting that while the tool itself is functioning as intended, its effectiveness is often undermined by incorrect or incomplete information being entered. Members of the Board highlighted that this, combined with the calculator's inherent complexity, can result in delays and rework. There was broad agreement that additional training and targeted support for FRAs and administrators would improve accuracy and overall efficiency. There was broad agreement that additional training and targeted support for FRAs and administrators would improve accuracy and overall efficiency.

ACTION 4.15: LGA to explore and implement options for providing additional support and guidance on the effective use of the GAD calculator.

BREAK

5. LGA general update

5.1 CJ provided the Board with a brief overview of the LGA general update paper which had been shared in advance of the meeting.

5.2 CJ updated the Board on contingent decisions, confirming recent engagement with the sector via coffee mornings and clarifying which cases can and cannot be reinstated into FPS 1992. The LGA has also advised FRAs to begin preparing for the forthcoming Matthews regulatory amendments, including identifying eligible cohorts and addressing data gaps.

5.3 The Board was also updated on ongoing tax complications with HMRC, which are delaying the Matthews compensation framework and asked the

Board to consider whether they would support LGAs request of writing to HMRC as set out in paragraph 30. The Board agreed that they should formally contact HMRC to highlight the sector's concerns and seek urgent clarification

ACTION 5.3: The Board agreed to write to HMRC setting out the sector's concerns regarding the tax treatment of Matthews arrears and requesting clarification necessary to progress the compensation framework

5.4 CJ noted work with MHCLG on developing a compensation framework for Matthews, highlighting two concerns: the need for specialist advice to be covered, supported by legal advice, and potential costs from reopening deceased estates. The LGA has asked for both areas to be included within the framework, and it was suggested by JL that the Board should write to MHCLG to support this request.

ACTION 5.4: The Board to write to MHCLG recommending that the compensation framework be expanded to include the costs of obtaining specialist tax advice and the costs associated with reopening estates for deceased members.

5.5 CJ reported that progress on the review of the Firefighters' Compensation Scheme, upcoming training plans for 2026, development of the member website, and ongoing LGA work planning.

5.6 CJ provided an update on the development of the 2026 training programme. She noted that the LGA had issued a Training Needs Analysis survey, but only a small number of responses had been received to date. It was agreed that TA would follow up to encourage further submissions.

ACTION 5.6: LGA to issue a reminder to complete the Training Needs Analysis survey.

5.7 HS highlighted difficulties processing Matthews payments due to the tight monthly window created by the timing of GAD interest rate releases and

payroll cut off dates, which significantly limits how many cases can be paid each month. This constraint adds to existing delays and reinforces the need for FRAs to prepare early for the upcoming Matthews regulatory amendments.

5.8 A query was raised about whether a separate payroll run could ease pressure on administrators processing Matthews payments, but it was confirmed this is not feasible due to fixed end of month payroll cut-off dates

5.9 Clair Alcock (CA) requested that the Board take note of item 25 in the paper and that this is included in the minutes. Item 25:

Our recommendations focused on three key areas:

1. Identifying eligible individuals who may be affected by the amendments.
2. Locating data used in the original calculator, where applicable, to ensure continuity and accuracy.
3. Gathering new financial and service data that will be required for future calculations

6. Update on the 'Need for Change' Review

6.1 The Board received an update on the Need for Change review, noting duplication of effort, resource gaps, member experience and capacity issues within FRAs, highlighted further by the Sargeant and Matthews remedies.

6.2 Survey results showed 86% of FRAs support exploring changes, including the option of a single scheme manager.

6.3 Work will continue with FRAs, administrators, unions and members, with recommendations to be developed for the NFCC and presented at the Fire management conference in March, subject to readiness.

6.4 RH observed that when the survey is issued, responses to a question such as *"Would you like it to be easier and cheaper?"* are likely to be overwhelmingly positive, as it is a question very few people would reasonably answer "no" to.

- 6.5 The Board noted the importance of engaging both supporters and those with concerns about change, and ensuring any future model improves consistency without lowering existing good practice
- 6.6 RH cautioned that a single scheme manager may reduce diversity of views, noting past reforms (e.g., Sargeant/Matthews) benefited from multiple perspectives.
- 6.7 RH raised concern that centralisation could risk inconsistent outcomes or lowered standards, while current local variation can sometimes benefit members.
- 6.8 The Board agreed any governance changes must consider the views of all FRAs, including those cautious about centralisation.

7. SAB Governance Update

- 7.1 TA provided an overview of the SAB Governance Paper and asked the Board to consider points 30, 31, 35, 37, 41, 57 and 66.
- 7.2 TA noted that, with DP stepping down from his position, several vacancies now exist on the SAB and on the other committees to which he was appointed. Work to fill these roles will need to be taken forward.

ACTION 7.2: Secretariat to begin the process of identifying and progressing arrangements to fill the current SAB vacancies.

- 7.3 DD observed that several subcommittees have not met for some time, raising concerns about whether they are fulfilling a meaningful role. JL acknowledged this, noting that while the Local Pension Board Effectiveness Committee has been active, other groups, such as those covering valuations and administration, have remained inactive despite having valuable work they could undertake. She recognised the operational challenges in convening these groups but agreed that reactivating them and ensuring regular meetings would be beneficial.

7.4 TA confirmed that there is an intention to re-invigorate the SAB subcommittees, noting that forthcoming changes in committee membership present a timely opportunity to reset expectations and ensure these groups become active and effective.

ACTION 7.4: Secretariat to review the current subcommittee structure and bring forward proposals to re-establish regular meetings and updated membership arrangements.

7.5 CA provided an overview of how the LGPS Board operates, outlining the structure, purpose, and meeting frequency of its committees. She also offered to share further insight and experience to support the SAB in strengthening its own committee arrangements.

7.6 JL invited comments on the governance documents. RH queried the requirements relating to the Conflicts of Interest policy, and JL confirmed that these obligations arise from the Public Service Pensions Act.

7.7 TA invited Board members to consider whether they would be willing to take on the role of Chair of the Scheme Management and Administration Committee, noting that expressions of interest would be welcomed. Richard Welch (RW) stated that he would be happy to have a conversation regarding this.

8. Board expenditure 2025/2026 and recommendations for 2026-2027

8.1 CJ provided an overview of the Board expenditure 2025/2026 and recommendations for 2026-2027 noting that, previously, timing of budget approvals had not been in line with MHCLG expectations.

8.2 The Board was reminded that the current year's budget had already been agreed, with expenditure reviewed up to the most recent reporting point, and an underspend is anticipated.

8.3 An outline of the proposed budget for the following year was shared, though final carry forward amounts cannot yet be confirmed.

8.4 The Board received an explanation of the updated approach to allocating LGA staff time and associated costs to SAB work.

8.5 The proposed levy for the forthcoming year was introduced, subject to formal approval outside the meeting due to the meeting being inquorate. CJ then asked the Board for feedback or questions.

8.6 RW queried the position on meeting expenses. CJ clarified that the June and September 2025 Board meetings were held online/hybrid, but that future meetings will be held in person, which will result in higher meeting costs going forward. She also clarified that going forwards, there will be four SAB meetings per year.

8.7 RH commented that it would be more helpful for the budget report to present actual costs rather than percentages. CJ confirmed that this information can be provided in future reports.

ACTION 8.7: CJ to ensure future budget reports present actual cost figures alongside percentages for clarity

8.8 Martin Rehorn (MR) asked how the above inflation increase to the levy would be communicated to FRAs. CJ responded that the LGA Fire Pensions Team will produce an annual report setting out how levy funding has been used and demonstrating the value and improvements delivered to FRA's.

8.9 It was agreed that including clearer information on underspend and surplus, along with improved presentation of tables, would help understanding and avoid confusion.

ACTION 8.9: CJ to update the budget report format to provide clearer underspend/surplus information and improved table presentation for recirculation.

9. LPB Chairs Forum

9.1 CJ introduced the standing item on the LPB Chairs Forum, outlining its purpose and the frequency of meetings.

9.2 She highlighted concerns raised by LPB Chairs regarding the difficulty in communicating directly with the SAB. CJ explained the steps taken to address this, including the creation of a designated SAB email inbox to support consistent communication. She also reported that four key issues were raised at the most recent LPB Chairs meeting which are detailed in item 15 of the LPB Chairs Forum paper.

9.3 CJ addressed concerns regarding missed Sargeant deadlines, noting that JL had already raised these issues with the Pensions Ombudsman

9.4 The Board discussed whether a centralised solution for members to access specialist advice could support members, acknowledging both the potential benefits and cost implications.

9.5 The Board also noted risks associated with inconsistent or poor-quality financial advice and the need to ensure appropriate support, especially for vulnerable members.

9.6 Options for centrally procured specialist tax support are being explored, though affordability and governance considerations remain.

10. Administrator Updates – Position Statements

10.1 The Board received reports from administrators and noted the key points raised.

11. Software supplier updates

11.1 The Board noted the written updates from software suppliers. No major concerns were raised.

12. AOB

12.1 The Board were reminded that updated Conflict of Interest declarations will be issued shortly to all existing members and advisors.

ACTION 12.1 Secretariat to circulate updated Conflict of Interest declaration forms to all current members and advisors and track completion

12.2 The Board noted low completion rates for the EDI survey and agreed a reminder would be sent.

ACTION 12.2: Secretariat to issue a reminder to all Board members to complete the EDI survey.

12.3 No further items were raised under AOB.

12.4 The Chair offered closing remarks, thanking members for their contributions and acknowledging the milestone of the 100th FPS Bulletin.

JL closed the meeting at 15.00