



Actions and agreements
Thursday 17 September 2020
MS Teams

PRESENT

Joanne Livingstone	SAB Chair
Cllr Nick Chard	Scheme Employer Representative (LGA)
Cllr Nikki Hennessy	Scheme Employer Representative (LGA)
Janet Perry (sub)	Scheme Employer Representative (LGA)
Cllr Roger Phillips	Scheme Employer Representative (LGA)
Cllr Roger Price	Scheme Employer Representative (LGA)
Cllr Leigh Redman	Scheme Employer Representative (LGA)
Cllr Ian Stephens	Scheme Employer Representative (LGA)
Philip Hayes	Scheme Member Representative (FRSA)
Matt Lamb	Scheme Member Representative (FBU)
Pete Smith	Scheme Member Representative (FBU)
Sean Starbuck	Scheme Member Representative (FBU)
Des Prichard	Scheme Member Representative (FLA)
Glyn Morgan	Scheme Member Representative (FOA)

Jane Marshall	Legal Adviser
Helen Scargill	Technical Adviser
Rob Hammond	First Actuarial
Craig Moran	First Actuarial
James Allen	First Actuarial
Claire McGow	SPPA (observer)
Nick Gannon	TPR [Items 5.2 – 5.5]

Clair Alcock	LGA – Board secretariat
Claire Hey	LGA – Board secretariat (Minutes)

Tahmina Ahmad	Home Office
Josh Goodkin	Home Office
Anthony Mooney	Home Office

1. Apologies

- 1.1. Apologies were received from Brian Hooper. Roger Hirst was substituted by Janet Perry.

Scheme Advisory Board Secretariat

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2. Conflict of interest

2.1. No conflicts were declared. Joanne Livingstone (JL) thanked members for returning conflict of interest forms. Going forward, forms are only required to be completed for new conflicts with a review to be carried out on an annual basis.

3. Minutes from previous meeting.

3.1. The minutes of the meeting held on 11 June 2020¹ were agreed as an accurate record. The Board agreed to publication of papers 1 to 3 on the public site.

Minutes reference	Action	Progress
6.1.7	The chair asked for comments to be submitted in advance of the next meeting.	Only comments from FOA have been received – carry forward.
6.3.16	Pensionable Pay Retrospection to be considered at next meeting	On agenda
6.3.16	Pensionable pay past service costs to be considered at next meeting.	GAD have requested information on this, for discussion as part of historic mistakes.

4. Chair's update

4.1. JL thanked the Board for the assistance received since commencing in post and acknowledged the considerable time commitment made by members. JL noted that the paperwork for the meeting had been delayed due to workloads on the team.

4.2. JL said that meetings have taken place with the devolved SAB chairs which has been helpful to form links and encourage collaborative working.

4.3. A meeting with HM Treasury took place to discuss the consultation. JL explained that the [Board tabled a list of questions](#) in advance, which

¹ [Meeting minutes 11 June 2020](#)

HMT partially engaged with. The Board want to push for continued engagement and are pleased to note that the secretariat has now been included in the cross scheme working group in an LGA capacity. There was a clear expectation that schemes would engage with their responsible bodies, for example, on individual Equality Impact Assessments (EIAs).

4.4. JL will introduce herself to the sector at the forthcoming FPS AGM and will be speaking to the SAB's role in providing assurance to stakeholders rather than reassurance. JL noted that previous Board decisions have clearly been made on an evidence basis and this role of scrutiny and engagement would continue. JL welcomed comments from the Board.

5. Papers for discussion

5.1. [Paper 1: Retrospective correction of historic pay mistakes](#)

5.1.1. Clair Alcock (CA) explained that the paper provided is a continuation of the discussion which took place in June. The Board are comfortable that FRAs can make supported and robust pensionable pay decisions, so consideration now needs to be given to correcting historic pay errors, due to the interaction of pay and contributions in final salary schemes.

5.1.2. The paper details issues for FRAs to consider in this regard, particularly around financing, strain on the scheme, and responsibilities in respect of the top-up grant. The SAB had commissioned legal advice on retrospection from Jane Marshall (JM). In terms of contributions in such cases such as Booth v MAWW which involved corrections backdated up to 30 years, the paper discusses whether the Limitation Act can apply or if payment should be requested from the identified start date of the error.

5.1.3. The secretariat has been considering the initial legal guidance with JM and FBU representatives to try to find common ground. However, there is no precedence or case law in place for retrospection. Other schemes have a confirmed position, but FPS does not.

5.1.4. CA identified three routes of action available to the Board:

- Do nothing - however, this is not in keeping with the role of the SAB.
- Provide limited notes to FRAs to allow individual decisions to be made - this would be unhelpful in addressing consistency.

- Engage with the Home Office and GAD to establish the effect on the scheme and seek to obtain a Part 8 decision to reach legal agreement. Consideration would need to be given to costs and who could take an application forward i.e. the Board could not.
- 5.1.5. JL asked members which option was preferred and to provide any other comments or concerns.
- 5.1.6. Sean Starbuck (SS) said that the first option is not viable as pensionable pay is a long-standing issue which has led to inconsistency and TPO determinations. The Board should now seek to provide advice, as FRAs are in a good position on pay decisions with a noticeable reduction in queries, but more questions are being raised on retrospection.
- 5.1.7. SS added that under the second option, notes could only be provided on what is already known. SS stated a preference for option three and noted that a Part 8 decision had been reached on the 18-20 contribution holiday and was an amicable way to resolve a contentious issue. A financial agreement was worked out in this case. SS indicated that the FBU would be interested in Home Office engagement on the practicalities of Part 8.
- 5.1.8. Cllr Roger Phillips (RPH) said that the employer representatives agreed with some of these points, noting that the SAB role is to improve the efficiency and integrity of the scheme. RPH acknowledged that there may be financial or legal risks, however, a Part 8 decision would be preferable to drive consistency.
- 5.1.9. Glyn Morgan (GM) agreed that it is not acceptable for the Board not to address the issue, due to difficulties faced by FRAs. GM supported option three.
- 5.1.10. Des Prichard (DP) wanted to understand the Board's liability in providing information versus advice and asked JM for a legal view. JM advised that the current difficulty is that definitive legal advice cannot be provided at this stage, only information on what the legal issues are.
- 5.1.11. GM commented that while there is no obligation for Board advice to be complied with, scheme managers must have regard to advice or information.
- 5.1.12. CA highlighted that the purpose of the paper is to determine how much further the Board want to go on this issue; as the information is not yet available, do the Board wish to pursue answers to allow advice to be provided.

- 5.1.13. JL noted two separate issues: how far do the Board want to progress, and what is the status of advice from the Board in general.
- 5.1.14. SS commented that the point has been raised as parties are not able to reach a consensus on retrospection/ limitation. The Board need to have a good understanding of the considerations in case of future legal judgments.
- 5.1.15. Cllr Ian Stephens (IS) said that the Board need to move forward and avoid 45 FRAs making individual decisions. RPH agreed that this is a basic role of the SAB which would undermine the integrity of the scheme not to progress. RPH added that the Board have an advisory role upwards and downwards.
- 5.1.16. JL summarised that obtaining a Part 8 decision was the consensus view. JL considered practical next steps and asked the Home Office for views. JL stated that engagement with GAD would also be needed.
- 5.1.17. Anthony Mooney (AM) had no objection to the request and advised that the Home Office will consider internally what their legal role is to support or contribute to the process. AM said that in *Norman v Cheshire*, FRAs reached agreement to seek their own legal advice. SS noted that this was in relation to a court case rather than a Part 8 decision.

5.2. [Paper 2: Pension administration market and complexity](#)

- 5.2.1. JL noted Helen Scargill (HS) may potentially have a conflict if the conversation moved onto preferred suppliers but she would leave the meeting for this item should such a conflict arise. JL explained that the Board would discuss options for easing complexity of administration and the risks of potential reduction to the market.
- 5.2.2. CA confirmed that the first part of the paper sets out the current framework for administration and management of the FPS. One issue is that this is carried out locally, meaning that responsibility legally lies with the FRA where they have outsourced administration, yet as they are not clients of the software suppliers, they have no control over contract management or costs. The paper goes into detail on the cost and complexity of the framework.

5.2.3. CA explained that the SAB had previously agreed to maintain a watching brief. However, it has become apparent that more administrators are withdrawing from the market. LGPS administrators no longer wish to facilitate FPS administration, due to the perceived additional complexity and risk. The LGPS is a funded scheme so has money to support administration and the scheme has a clearer plan on a remedy solution, so is treated as a priority for both administration and software.

5.2.4. Finally, the paper comments on procurement challenges that mean options to test the market and value for money are limited.

5.2.5. The options provided for consideration have pros and cons:

- Centralising administration would not address the management of the scheme and employer support would be needed.
- The scheme manager role involves complex decision making at a local level. There may be opportunity to delegate the scheme manager function to a central body, although this may be organisationally challenging and removing functions from an FRA could be politically sensitive.

5.2.6. CA explained that robust evidence would be needed to support a business case to drive change. The paper recommends an information gathering exercise plus wider consultation with FRAs and administrators to assess appetite for change and indicative preferences.

5.2.7. CA commented that leaving the situation to resolve naturally could introduce more risk to the sector and that the SAB should seek to be proactive rather than reactive, and work with the sector to consider alternatives.

5.2.8. Nick Gannon (NG) agreed that CA's points were well made. NG added that changing administrator is not a small task and is therefore preferable to be planned in advance, instead of being forced due to providers withdrawing. NG suggested this could lead to two or three large providers, or authorities reverting back to County Council arrangements which may be less attractive.

5.2.9. NG asked whether there is scope to 'in-source' administration by setting up a central body, as the scheme is relatively small with a high administration cost. However, this would not address scheme management. NG commented that the timing is not ideal with impending remedy, however, there is never likely to be a good time as such.

5.2.10. JL summarised that the proposal of the paper is to collect further information and evidence, rather than address specifics. JL asked the Board for consensus to commission a survey.

5.2.11. RPH said the Board's role is to identify risks to the scheme, tackle issues, and build resilience. Evidence is needed to confirm the risk. The Aon report gave a clear indication of costs, which come out of revenue budgets and directly impact on frontline services. RPH stated that all options are needed on the table, following collection of the relevant evidence.

5.2.12. Craig Moran (CMO) agreed with the points raised and noted that the Police scheme is similarly subject to local administration and management. CMO asked whether there were any lessons to be learned from the Police sector. CA confirmed that the same issues are raised by NPCC/ LGA colleagues. Police have one dominant administrator, but issues with scheme management remain.

5.2.13. SS noted that CA had provided a good summary to the Board in an area that is perhaps not widely understood. SS did not feel able to recommend centralisation of services without assurance that it would resolve the issues. SS supported the collection of information but was unclear on the eventual objective.

5.2.14. JL emphasised that centralising administration was not necessarily the recommendation, the paper is intended to sight Board members on current issues in the marketplace. DP said that Chief Fire Officers have expressed concern over administration and are being encouraged to cite this risk on their corporate register. DP supported data gathering, not necessarily to recommend an option for change, but to work with FRAs to raise awareness and consider mitigation.

5.2.15. JL confirmed the Board's agreement to request further information.

Action 03.10.2019 (7)
Secretariat to draft survey for FRAs and administrators and request details of current contracts from FRAs. Drafts will be submitted to Board for review.

5.3. [Paper 3: Abatement guidance](#)

- 5.3.1. JL introduced the above paper highlighting issues with the planned abatement guidance which have now reached an impasse. CA commented that the guidance had been produced by the LGA and subject to consultation with stakeholders to address a lack of detailed policy.
- 5.3.2. There are two outstanding queries at paragraphs 7.1 and 7.2 of the paper. The first is a technical point which may require a view from GAD. The second highlights a potential conflict with HMRC policy and may be a legal or employment issue. The Home Office have previously been asked informally to provide a view. The Board should now consider whether to escalate to a formal request or seek legal advice. The Board were also asked to agree the draft guidance in principal.
- 5.3.3. SS noted the guidance and said it could not be agreed until the outstanding queries were resolved. SS supported obtaining a legal view on the interpretation of the regulations. JL asked who that legal advice would be directed to.
- 5.3.4. CA explained that there is no budget to request legal advice expect for under the SAB, therefore Board agreement would be needed. Any advice provided would need to be incorporated into the guidance to be useful. CA highlighted that the issues are of a practical nature and are not contentious. However, SAB support would provide assurance to FRAs. CA added consensus on the outstanding queries could not be reached with employers and the LGA can go no further without escalation.
- 5.3.5. RPH said it is sensible for the Board to seek advice to achieve a neutral and consistent position. JM was asked if there is any current legal guidance regarding abatement. JM confirmed that she has previously provided advice to FRAs on an individual basis as there is no guidance available, but some general advice could be looked at. JM explained that the regulations are extremely light touch and the impact on funding, which is subject to Secretary of State guidance, is the extent of the legal basis on how abatement works.
- 5.3.6. JL suggested that the guidance could be resubmitted the Home Office for comment on policy intent, prior to seeking a legal view. JM stated that the available steer on policy intent dates back to the introduction of abatement and there may have been changes since.

5.3.7. GM commented that although he disagrees with abatement in general, he supported the option to seek legal advice before agreeing the guidance. SS reiterated that the guidance should not be agreed before the Board are confident of the legal position.

5.3.8. JL noted an action to take the guidance forward for a legal view.

Action 17.09.2020 (5.3)

Secretariat to obtain a legal view on outstanding abatement queries to incorporate into the draft guidance.

5.4. [Paper 4: Immediate detriment guidance](#)

5.4.1. JL highlighted that paper 4 illustrates the complex nature of the note provided by the Home Office to instruct FRAs on processing immediate detriment cases. The discussion points for the Board are to establish expectations of dealing with and publishing the guidance.

5.4.2. CA confirmed that the paper sets out the current position and some of the legal and practical considerations arising. It is understood that the Home Office and HM Treasury are relying on section 61 of the Act to apply the note to non-claimants, however, this has an impact on the FRA's schedule 22 defence, and it would therefore be legally problematic for them to accept this position. The LGA are seeking urgent legal advice on this point.

5.4.3. CA stressed that the note can be applied under the terms of the interim order. Some of the technical issues raised are surmountable, some are not, for example, CETVs, added pension, lack of advice on divorce or scheme pays debits. There is no commentary around re-assessment of tax for the remedy period, or conversion of membership from CARE to final salary in relation to CPD/ APBs, two pension entitlements, contribution holidays, and abatement.

5.4.4. Additionally, accrual rates may be subject to change under the recalculation of the cost-cap and this would need to be strongly caveated. There may also be implications for taper members. At present, it is unclear how many members are likely to be affected. The paper highlights the risk of FRAs not providing detailed information to enable members to make a choice; the risk of inconsistency and lack of governance; and the manual strain on administration due to unavailable software support.

- 5.4.5. The Board should consider the impact of these points and what practical support can be offered to support implementation and help FRAs evidence robust decision making. The LGA is working with the communications group on preparing a choice pack for members to include quotations, contributions schedules, and tax implications, using documentation provided in 2006 as a template.
- 5.4.6. CA asked the Board for views on their expectations from various parties and whether further information on quantum should be requested. Agreement was sought on publication of the paper to give FRAs more certainty over future actions.
- 5.4.7. Janet Perry (JP) stated on behalf of Roger Hirst that he felt strongly that individuals are being asked to make life-changing decisions and their retirements are being delayed.
- 5.4.8. SS commented that the interim order was laid nine months ago, and members are continuing to suffer immediate detriment. FBU's stance is that FRAs should proceed with the guidance and not expect further assistance or clarification from the Home Office. SS said that although the paper lists the complexities involved, there are likely to be some cases that can be processed. FBU dispute the FRA's schedule 22 argument.
- 5.4.9. GM confirmed that FOA also feel that FRAs need to act, while accepting that there are unknowns that need to be considered. GM pointed out that the note is caveated to state that cases will be revisited after remedy. GM added that further guidance would be helpful but cannot be relied on. GM supported a request for information.
- 5.4.10. JL summarised that the Board need to think about how to advise FRAs on proceeding with the guidance and help authorities establish what can be done. JL highlighted that there are some concerns which cut across the consultation, which would make it difficult to action now.
- 5.4.11. NG noted that the situation is particularly complex and TPR's position would be to only action if employers are confident that the action is correct. NG felt that information gathering would be useful and highlighted that there is a risk of needing to unpick cases in the future. Consistency is key, so TPR feel a SAB steer is needed. TPR's survey data shows that early retirement and ill-health are key causes of complaint, and schemes should be wary of exacerbating this.

- 5.4.12. RPH highlighted the need for FRAs to exercise caution. RPH said decisions could likely be made for straightforward cases and a risk assessment should be carried out. RPH supported obtaining data from FRAs.
- 5.4.13. GM said while the complexity is acknowledged, time is an issue. GM proposed a statement is issued by employers to note that they are working on an agreed approach.
- 5.4.14. JL noted that the Board expect FRAs to be cognisant of the issues and communicate with members. RPH commented that resources should also be shared with other FRAs to support consistency.
- 5.4.15. SS emphasised the overarching position that members have an immediate entitlement and said it is not acceptable to delay cases until implementation of remedy in 2022. SS noted that financial claims are building up and commented that the note does not differentiate between claimants and non-claimants. SS added that FRAs have previously been advised to obtain IQMP decisions across both legacy and reformed schemes.
- 5.4.16. JL remarked that there are two separate issues: members who are not receiving any benefits and those that are receiving incorrect benefits. JL noted that the SAB cannot pronounce on the legal status and while it would be sensible to ask FRAs to triage cases, the Board cannot dictate to employers.
- 5.4.17. DP agreed with the FBU stance that FRAs need to act pragmatically on the information to hand and that it would be in most eligible members' interests to pay benefits from the legacy scheme. DP cautioned that clarification might not be forthcoming if action is delayed awaiting this and added that benefits should be caveated as requiring future amendment.
- 5.4.18. JP asked if the Home Office were able to comment on the note, however, representatives from the department had left the meeting. JP understood that there are unresolved issues but felt that employers have a duty to act to avoid letting members down. JP suggested the Board take an action to advise FRAs to progress as best they can.
- 5.4.19. CA clarified that the paper was intended to support FRAs implementing immediate cases, while giving due consideration to the issues outlined and being able to evidence robust decision making. CA highlighted that timeframe is a particular concern. The Home Office are looking at revising the guidance, although this is

likely to take some time. The LGA are supportive of the note and providing additional information but are also working on the consultation response and other workstreams.

5.4.20. RPH agreed that FRAs should proceed where possible and highlighted that consistency and communication are key. RPH commented that the Board should push for responses to survey, as lack of response may be indicative of a wider governance issue.

5.4.21. SS remarked that note could be construed as negative rather than supportive, citing paragraph 38 as an example which comments on the risk of legal action against employers. CA noted that it would have been helpful to have an administrative view, however, HS was experiencing technical difficulties in participating in this part of the call. CA explained that the risk of challenge if proper advice is not given must be recognised.

5.4.22. JL summarised that there was a clear appetite to issue further information once the nuances have been carefully considered. An urgent steer is needed on tax and legal issues. JL added that FRAs should be encouraged to share information between themselves and that data on quantum should be requested.

Action 17.09.2020 (5.4)

Secretariat to draft information note for FRAs to support implementation of Home Office immediate detriment guidance or robustly evidence challenges. Information to be requested on number of eligible members.
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5.5. [Paper 5: Sargent/ McCloud consultation](#)

5.5.1. JL introduced paper 5 as a strawman on various issues arising from the consultation which will give the Board opportunity to feed into responses to the questions. JL welcomed the opportunity to discuss the HMT stakeholder meeting and timescales. JL explained that HMT had talked about the cost-cap principles but were mainly in listening mode. JL confirmed that the devolved SAB chairs are all broadly supportive of DCU.

5.5.2. GM suggested that members submit comments in writing due to late receipt of the paper. CA confirmed that the paper was intended to stimulate ideas and comments and will be a live document to inform the basis of the Board's response during an ongoing process of engagement. CA asked whether members needed more examples or clarification on technical points, such as Club transfer.

- 5.5.3. RPH noted that either option will be very challenging to administrators and FRAs which needs to be strongly reflected in the response in terms of timescales and expectations. DCU mitigates the most risk yet applies considerable administrative pressure.
- 5.5.4. JL confirmed that timescales were discussed with HMT. They are unable to finalise the cost-cap Directions until the decision of DCU or immediate choice is made, and this creates an additional time pressure.
- 5.5.5. CA reflected on key points from the paper further to comments made regarding administration. For example, software suppliers are also unable to start development until a decision is reached. An optimistic timetable is provided within the paper to illustrate that delivering DCU in 2022 would be a significant challenge to FRAs, particularly due to the administration and management structure. DP suggested that each stage would take an additional six months.
- 5.5.6. NG said that the Board need to make a detailed response which includes practical cases which may not have been considered and presents any unanswered questions. Information on the potential cost and resource burden of software and administration should be included to inform what is achievable, as HMT need to be made aware of this. NG explained that the resource and planning ability of smaller authorities should be considered, as well as tax implications and the ability to provide advice, and any discrepancies between the schemes which may lead to further unintended discrimination.
- 5.5.7. JL said HMT had acknowledged where information was needed and had advised the Board to work with the Home Office on workforce issues. JL found it positive that the paper was drawing issues out and asked what TPR's role would be in relation to remedy.
- 5.5.8. NG said that TPR's involvement was under discussion. They are erring towards a guidance approach, as they deal with schemes across the public service landscape. This will include bulletin updates and similar. The regulator's role is to be helpful rather than punitive and they are aware that schemes are keen to act in the best interest of members. While regulator can assist with resourcing in extreme circumstances, they are likely to provide little practical assistance.

- 5.5.9. JL noted that different remediation was alluded to and asked if this is likely. NG suggested that most schemes will be given DCU, which is not TPR's preferred option, however, there is scope for different schemes to have different solutions due to individual workforces having separate regulations. NG suggested the Government may be willing to accommodate this and strongly recommended that the Board respond to any future consultation on scheme regulations.
- 5.5.10. JL asked NG for thoughts on regulatory drafting and timelines. NG said each department will produce draft regulations separately and Brexit is likely to divert parliamentary legal resources which may delay legislation.
- 5.5.11. SS welcomed the paper as a resource to inform responses. SS stated that immediate choice only works if sufficient information is provided, and the only way to mitigate risk is DCU. SS said that if information could be guaranteed to be accurate and robust, immediate choice may be more attractive, but asked who would provide this information.
- 5.5.12. CA confirmed that responsibility for providing information will lie with the scheme manager, administrator, and software provider. CA highlighted that software suppliers are very willing to engage with the SAB and Home Office on a confidential basis and this is worth pursuing. CA commented that there is uncertainty around the commissioning and development of online tools, as the software suppliers for Fire and Police develop their own specifications and products, which they then sell on to their administrator clients. No central contract management exists for the scheme manager. The options are therefore online member self-service provided through the administration software or a spreadsheet calculator provided by GAD.
- 5.5.13. JL highlighted that HMT had referred the Board back to the Home Office on this point. JL noted that NG had urged scheme specific examples and said that a separate FPS EIA is needed. NG commented that one of the large central schemes has a project underway.
- 5.5.14. JL concluded the item by inviting written comments on the paper which would be referred to the remedy stakeholder group.

6. Papers to note

6.1. [Paper 6: Administration strategy consultation response](#)

- 6.1.1. CA outlined the background to the draft template administration strategy. CA confirmed that the responses received were largely positive, however, relatively few responses were received. CA explained that minor adjustments would be made to the strategy before publication and this will set a SAB-supported expected standard. CA noted thanks to Claire Hey (CH) for drafting the template.
- 6.1.2. JL asked if local pension boards had been sighted as the strategy also covers scheme governance. CA expected this to be the case but could not confirm absolutely. JL said that the document is useful and should be promoted to authorities to adopt once finalised. CA confirmed that the document would be signposted at the AGM.
- 6.1.3. JP asked if PFCCs would have had opportunity to comment and suggested that requests for information needed to be better communicated. CA highlighted an expectation for internal controls to be in place to ensure a response was submitted as the consultation was included in two monthly bulletins and this is the main channel for communicating with stakeholders.
- 6.1.4. RPH noted the report and stated that non-respondents to surveys and information requests should be flagged up. IS agreed that lack of engagement is concerning and commented that organisations should be asked why they have not responded.
- 6.1.5. Cllr Roger Price (RPR) suggested that the list of elected members held by the LGA could be used to target those on local boards. RPR said he would feed back from his own board.
- 6.1.6. JL suggested the Board think about formal and informal ways of increasing engagement. JP added that consideration should be given to how to communicate, especially when a response is needed. CH confirmed that a response could still be made by Essex PFCC if required.

6.2. [Paper 7: COVID-19 governance survey update](#)

- 6.2.1. JL noted that the COVID-19 governance survey had also shown a disappointing lack of engagement. CA confirmed that the survey had been undertaken to look at good governance practice and the usual FRAs had responded.

6.2.2. The contents of the paper were noted.

6.3. [Paper 8: Update on action summary](#)

6.3.1. CA confirmed the contents of the paper to note. A number of actions are in progress and the Board have agreed to postpone actions in relation to ill-health guidance and pensions tax.

6.3.2. The action on data in relation to remedy is outstanding, to be picked up at the AGM, and written comments on the interpretation of temporary in the context of the scheme are still awaited. This will be carried forward to the next meeting.

7. Future meeting dates and venues

7.1. JL confirmed the next scheduled meeting will take place virtually on 10 December 2020. Timetabling on the consultation response will be scheduled.

7.2. CA provided the following prospective dates for the 2021 meeting cycle:

Thursday 11 March 2021
Thursday 24 June 2021
Thursday 9 September 2021
Thursday 9 December 2021

7.3. CA confirmed that meetings would be held virtually until further notice.

8. AOB

8.1. JL asked the Board to agree to the addition of Ian Hayton from NFCC as a permanent observer. CA added that it would be prudent for Ian to be more closely involved in the current climate in his role as pension lead for the NFCC.

8.2. The Board agreed unanimously.