Firefighters' Pensions England
Scheme Advisory Board

Actions and agreements

18 March 2026

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

Chair		
Joanne Livingstone	Scheme Advisory Board Chair	Present
Scheme Member Representatives		
Philip Hayes	Fire and Rescue Services Association (FRSA) - Standing member	Present
Ben Selby	Fire Brigades Union (FBU) – Substitute for Mark Rowe	Present
Andrew Fox-Hewitt	Fire Brigades Union (FBU) - Standing member	Present
Mark Stilwell	Fire Brigades Union (FBU) - Observer	Present
Tony Curry	Fire Brigades Union (FBU) - Standing member	Present
Matt Cook	Avon Fire and Rescue Service – Standing member	Present
Glyn Morgan	Fire Officers' Association – Standing member	Present
Scheme Employer Representatives		
Roger Hirst	Local Government Association - Standing member	Present
Dawn Docx	NFCC Pensions Lead – Standing member	Present
Martin Reohorn	Hereford and Worcester Fire and Rescue Service – Director of Finance and Treasurer – Standing member	Present

Richard Welch	Avon Fire and Rescue Service – Assistant Chief Fire Officer – Standing member	Present
Advisors to the Board		
Helen Scargill	Technical Advisor	Virtual
Craig Moran	First Actuarial – Actuarial Advisor	Present
James Allen	First Actuarial – Actuarial Advisor	Present
Jane Marshall	DAC Beachcroft - Legal Advisor	Present
Secretariat		
Claire Johnson	Senior Firefighter Pension Advisor	Virtual
Tara Atkins	Firefighter Pension Advisor	Present
Jill Swift	Firefighter Pension Advisor	Present
Suzanne Williams	Firefighter Pension Programme Support Officer (minutes)	Virtual
MHCLG		
Helen Fisher	Speaker	Present *
Florence Harvey	Speaker	Present *
Government Actuary's Department		
Mike Scanlon	Speaker	Present
Brian Allen	Speaker	Present
Devolved Governments		
Karen Gilchrist	SPPA - Observer	Present

* Left meeting at 13.00 for pre-arranged commitment

1. **Welcome, Apologies and Conflict of Interest**

1.1 The Chair, Joanne Livingstone (JL) opened the meeting at 11.00.

1.2 JL noted apologies from Cllr Roger Phillips, Cllr Roger Price, and Cllr Les Byrom.

1.3 JL welcomed Ben Selby, attending as substitute for Mark Rowe (MR). She also welcomed Matt Cook (MC) as the newly elected member and confirmed that Dawn Docx (DD), Richard Welch (RW), and Martin Reohorn (MR) have now received formal approval to join the Board. JL further noted that Mark Stilwell (MS) was in attendance as an observer, following confirmation from the Fire Brigades Union (FBU) of his election to the Board which is pending approval.

1.4 JL confirmed that Helen Scargill (HS), Claire Johnson (CJ), and Suzanne Williams (SW) will be joining the meeting remotely.

1.5 JL invited declarations of any conflicts of interest; none were raised. She noted that conflict of interest forms would be covered later in the meeting by Tara Atkins (TA).

2. Minutes (11 December 2025), actions arising and Chair's update.

2.1 JL then moved to the minutes for the December 2025 meeting. She advised that, upon review, one reference incorrectly identified the Local Pensions Board committee relating to the appointment of a chair. SW was asked to take an action to correct this. No other comments were raised.

ACTION 2.1: Review and correct the committee reference in the previous meeting's minutes where the Chair vacancy was attributed to the wrong committee.

2.2 CJ provided an update on the actions arising from the meeting held on 11 December 2025, noting that a significant number had been identified. She confirmed which actions had been completed and highlighted those that remain outstanding.

2.3 CJ provided an update on Action 2.9, summarising the three areas raised by the FBU:

2.3.1 She advised that the LGA are unable to provide access to legal advice, due to legal privilege.

2.3.2 Regarding access to query logs, CJ proposed to store a copy of these in the protected area of the SAB website to enable SAB members to access them. This would be subject to an appropriate terms of use

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policy. The FBU indicated support for this approach and CJ sought a decision from the wider board. JL confirmed that it would be beneficial for other board members and invited any opposing views, none were received.

2.3.3 Regarding access to the GAD calculator, CJ proposed hosting in the same protected area of the SAB website with equivalent terms of use policy. As the LGA does not own the calculator, MHCLG would need to confirm whether they are content with this. JL invited objections from MHCLG, none were received. JL confirmed that this was an agreed action.

ACTION 2.3.3: Store a copy of the query logs and GAD calculator in the protected area of the SAB website for access by SAB members and develop an appropriate terms of use policy to accompany this.

2.4 On Action 4.12, CJ reported that the data request form has been updated to capture the required data from the March return. This data will be available for the Board to review at the June meeting.

2.5 On 4.15, LGA to explore and implement options to provide an additional support and guidance on the effective use of the GAD calculator, CJ noted that recent analysis indicates three categories of performance across FRAs in relation to Matthews:

- those delivering the remedy on time
- those showing limited progress
- those making progress but with significantly lower take-up rates than sector averages.

CJ advised that the LGA has written to scheme managers and LPB chairs, targeted according to which category they fall into, offering further support where needed.

2.6 CJ asked whether it would be helpful for the Board to receive copies of the communications issued, along with a list of which FRAs received which version. JL confirmed this would be beneficial for governance oversight.

ACTION 2.6: Provide the Board with copies of the targeted communications issued to scheme managers, along with a list indicating which FRAs received each version, to support governance oversight.

2.7 CJ invited TA to provide an update on Action 6.4 regarding completion of the Training Needs Analysis survey. TA reported that only three had been received to date and confirmed that this item would be discussed further under the Governance Update. JL encouraged the Board to be proactive about training needs and to approach the LGA with any requirements.

2.8 On Action 7.2, CJ reported that an advertisement had been included in a recent edition of the FPS bulletin, but no responses were received. As the action remains outstanding, the LGA will now progress targeted communications to support recruitment.

2.9 Regarding Action 12.1, CJ noted that three conflict of interest forms remain outstanding.

2.10 CJ confirmed that this concluded the update of actions. JL invited questions, and none were raised.

3. MHCLG update

3.1 Helen Fisher (HF) introduced her colleague, Florence Harvey (FH), who was also in attendance. She welcomed the opportunity to give an overview of current work across several areas, including contributions, compensation, McCloud opt-outs, and Matthews remedy implementation.

3.2 HF confirmed that following the publication of the contributions consultation response, the legislation to implement the revised contribution rates has now been signed and laid and will come into force on 1 April.

3.3 Ben Selby (BS) highlighted concerns raised by members who will face increased contribution rates, particularly within London Fire Brigade. The impact appears to be driven by London weighting pushing some members into higher contribution bands.

3.4 Andrew Fox-Hewitt (AFH) highlighted several unintended consequences arising from the recent contribution changes and asked that these be noted. These include London firefighters being pushed into higher contribution tiers, a resulting reduction in incentives to undertake voluntary specialist duties, and very small pay differentials between certain ranks which may discourage promotion. He emphasised that further work is required to ensure the scheme remains sustainable and continues to support career progression.

3.5 HF thanked BS and AFH for raising these concerns and acknowledged that tiered contribution systems inevitably create cut-off points that affect different groups differently. She recognised the specific scenario highlighted but noted that similar issues arise whenever the thresholds are moved. She added that, if the Board or the FBU wish the Government to consider pensionable allowances further, this could be explored. H noted that this was not considered to fall within the scope of contributions spending review and clarified that eligibility for reinstatement into the 1992 scheme applies only to members who opted out during the relevant remedy period and does not extend to those who opted out prior to that period.

3.6 Regarding compensation injury awards, HF reported that work continues with LGA support with recommendations expected by end of May.

3.7 HF advised that the Government is undertaking a scoping exercise for a wider stocktake of the Fire Pensions function. This will consider team resilience, cyber security, data protection, and administration performance.

3.8 HF informed the Board that Ministers have now considered the proposals relating to the reinstatement of opted out service for those affected by the Sargeant remedy. She confirmed that the Government intends to introduce regulations to place affected members back into the correct legacy scheme in which they last accrued pension. She noted that this outcome aligns with

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the sector's preferred position, ensuring members receive pension rights in the correct scheme rather than compensation for being in the wrong one. She advised that a Written Ministerial Statement will be issued within the next two weeks.

3.9 BS sought clarification on which members would be affected by the regulatory change, e.g., whether it applies only to those who opted out during the remedy period or to a wider group.

3.10 HF clarified that the change would apply to members who opted out before or during the remedy period where the optout was due to discrimination, but regulations will only allow for service to be restored within the remedy period. She noted that those who opted out within six months of 1 April 2015 are automatically deemed to have opted out because of discrimination. Where evidence shows the optout was due to discrimination, either within six months of 1 April 2015 or more broadly, the member will return to the last legacy scheme in which they accrued benefits.

3.11 CJ asked whether the Board should seek legal advice and set a consistent approach to reinstating opt out service ahead of legislation, to avoid variation across FRAs. She also asked MHCLG whether the consultation will address disqualifying breaks in service for members who opted out before the remedy period.

3.12 HF confirmed that the consultation will consider issues around continuity of service and final salary protection, noting early internal work on scenarios has been done by MHCLG. She reiterated that the aim is to return members to the position they would have been in should the discrimination had not occurred.

3.13 JL noted that some FRAs, including London, are already seeking their own legal advice regarding reinstating opt-out service ahead of legislation and suggested continued follow up on this point. A discussion took place on whether the Board should seek national legal advice or issue a Board statement on risk, acknowledging differing views. Some members cautioned that national legal advice may be overly risk averse, while others noted the

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risk of inconsistent local advice if taken individually. HF advised that the Government cannot direct action outside legislation but considers the risk of early action very low for this cohort of members.

3.14 The Board considered issuing a statement highlighting the low level of risk and encouraging a consistent approach in members' best interests. Jane Marshall (JM) was invited to offer an opinion by JL. JM indicated that a positive legal view may be possible once the Written Ministerial Statement is published. HF agreed to share this with JM once the wording has been finalised.

ACTION 3.14: HF to share the Written Ministerial Statement and MHCLGs high-level thinking on how they will look to address the gap in service with JM ahead of publication, to enable consideration of a legal view.

3.15 The Board discussed the scale and urgency of cases affected by the reinstatement of opted out service issue. HF noted that most impacted members remain active, with only a small number approaching or at retirement. CJ highlighted that London has a notable group of members waiting to retire and raised concerns about disqualifying breaks. HF confirmed that solutions for continuity of service are being explored. CJ asked whether GAD optout data (pre and post1 April 2015) could be shared to support understanding of the issue, and HF agreed to review what could be provided.

ACTION 3.15: HF to share pre- and post-1 April 2015 opt-out data.

3.16 HF reported that legislation implementing the Matthews remedy has been signed and laid, with effect from 1 April 2026. The Matthews compensation framework is awaiting final confirmation from HM Treasury on funding mechanisms following recent HMRC clarification. Guidance will be issued as soon as approval is received, which is expected by the end of next month. Government is still considering the additional request to include member costs incurred by seeking specialist advice and costs incurred for reopening an estate.

3.17 HF confirmed that ministerial approval for the new SAB members has been granted, and letters were issued on 12 March. She thanked those who had already returned their acceptance letters and asked any remaining members to do so.

ACTION 3.17 New SAB members who have not yet returned their acceptance letters are asked to do so.

4. GAD update

4.1 Brian Allan (BA) provided an update on the 2024 valuation, confirming that work is currently in the assumption setting phase, with full formal advice due in the summer. HM Treasury set assumptions will be addressed separately, but this session focused on assumptions where SAB members have relevant insight.

4.2 BA explained that administrator data supplied for the valuation has been used to analyse recent member behaviour.

4.3 GAD explained that updated administrator data shows fewer younger firefighters are leaving than previously assumed, particularly those under age 40, where actual withdrawals are well below the 2020 valuation expectation. Above age 40, experience remains broadly consistent with existing assumptions.

4.4 To avoid sharp changes in employer rates between valuations, GAD proposed refining the withdrawal assumption using a rough 50/50 weighting between the previous assumption and the new evidence for under-40s, while retaining the existing assumption for older ages.

4.5 It was noted that the trend appears across whole-time and retained firefighters.

4.6 Board members sought clarification on how later joining ages affect the data. Michael Scanlon (MS) confirmed that the analysis uses the actual age distribution of current scheme members, which already reflects the trend that many now join in their late 20s or early 30s. The lower predicted withdrawal volumes in the early 20s reflect the small number of members in that age bracket, not a view that younger firefighters are unlikely to leave

4.7 In response to a question raised by BS concerning whether withdrawal behaviour should reflect service length rather than age, MS advised that early career departures are already captured separately, but that once members have around 10 years' service, age becomes a more reliable predictor of withdrawal across all valuations.
NOTE: Clarification of this minuted item is outstanding (Michael Scanlon).

4.8 AFH expressed concern that the data might hint at broader retention issues linked to scheme changes. BA noted the importance of this line of enquiry but confirmed it sits outside the valuation remit.

4.9 Given the complexity of the analysis and the strong level of interest, JL proposed that GAD provide additional information, with the Board to consider and follow up once this has been received.

ACTION 4.9: GAD to provide the Board with additional information to support the analysis of the 2024 Valuation, for the Board to review and follow up upon receipt.

4.10 BA provided an update on Matthews calculations. He reported that assumptions for the Matthew valuation are largely unchanged, although FRAs have identified additional eligible members, making the exercise slightly larger than expected. He outlined the planned updates to the GAD calculator, with a revised version due in early April to incorporate annual pension increase (PI) updates, followed by further functionality to support the regulatory amendments and wider user experience improvements from June 2026 onwards.

4.11 BA confirmed progress on manual cases, which affect around 1% of the ~20,000 eligible members. Methods are now in place for roughly one-third of these cases, including retrospective ill-health updates, with remaining methods to be completed over the next nine months to ensure all cases can be processed before the exercise ends.

4.12 MS provided an update on deemed elections. He outlined when deemed elections apply and explained the factors scheme managers must consider when making one, including the member’s pension, dependants’ benefits, and any contribution adjustment.

4.13 MS noted that draft guidance on deemed elections issued to the LGA represents GAD’s intended advice to scheme managers.

4.14 MS advised that the draft guidance sets out two main points: comparisons should be based on the benefits shown in the member’s Remediable Service Statement (RSS), and existing actuarial factors should be used where pensions need to be compared with cash amounts such as contribution adjustments

4.15 MS gave a short update on transfers without a home following the during the Sargeant remedy. He explained that transfers can only go into a legacy scheme if permitted within the 12month transfer window; otherwise, where members have post1 April 2022 service, the transfer is treated as a 2015 Scheme benefit. If neither applies, compensation is payable, and MHCLG has indicated this should be a lump sum rather than ongoing payment. **NOTE:** Clarification of this minuted item is outstanding (Michael Scanlon).

4.16 JL noted that questions had been raised about when scheme managers should apply a deemed election, particularly for immediate choice pensioner cases where members may not have responded within the 12 month period. She highlighted that determining the correct point at which a deemed election must be made requires further consideration and legal advice should be sought. She also observed that an actuarial comparison based solely on the value of benefits may not capture certain factors, such as marital status, which may not be shown on the RSS but could affect how spouses are treated under each scheme. She indicated that the Board would need to continue exploring this issue in more detail and will ask First Actuarial to consider this further.

ACTION 4.16.1: Take legal advice on 12 month point.

ACTION 4.16.2: Take actuarial advice on spousal position

4.17 MR asked whether the lack of member elections was genuinely an issue, noting that in his (small) service most members seemed to know what decision they wished to make. CJ responded that it is an issue, though affecting a relatively small number of cases. She noted that the LGA has already produced communications in a recent FPS bulletin to prompt administrators to act and provide timely reminders to members. CJ also offered to support rep bodies in their communications. JL suggested that this could be followed up outside of the meeting.

ACTION 4.17: CJ to follow up with rep bodies regarding supporting communications around deemed elections.

4.18 CJ raised a question regarding the timeline for delivery of the Matthews calculator, noting from GAD's slides that it is expected to be available alongside the regulatory amendments in June. She asked how the Board wished to communicate this to the sector, given that the LGA has already been preparing FRAs for the 1 April regulatory changes. CJ observed that while some FRAs are still working through existing Matthews requirements, others are keen to progress work on the forthcoming amendments. She queried whether this should be referenced in the local pension board chairs' letter and asked GAD whether the calculator release is expected in early or late June, as this will determine whether there is an eight- or twelve-week lag.

4.19 BA confirmed GAD confirmed that the calculator is expected to be available by the end of June. They noted there is uncertainty in the timetable because the work requires full testing, and any issues identified will need to be fixed before release. If testing progresses more quickly than expected, an earlier launch may be possible.

4.20 JL suggested that communication regarding the new GAD calculator could be included in the Board Local Pension Board (LPB) Chair's letter, no objections to this approach were put forward.

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ACTION 4.20: Board's letter to LPB Chairs to include information on the new release of the new Matthews calculator.

5. Member Self-Service (MSS) Demonstration

5.1 The Board received demonstrations from software suppliers on member self-service functionality and noted the key points and actions raised.

6. LGA general update

6.1 CJ provided the Board with a brief overview of the LGA update paper. She noted that as it had been shared in advance of the meeting, she would provide a brief overview.

6.2 CJ reported that work on the Sargeant remedy is ongoing, with delivery across the sector remaining uneven; some administrators and FRAs are nearing completion, while others are still heavily engaged in the process. She reiterated that the contingent decision issue remains unresolved, noting ongoing concerns about disqualifying breaks, and highlighted that some members' retirement plans are currently on hold pending resolution.

6.3 On the Matthews remedy, progress also varies widely between FRAs. CJ confirmed she will report back to the Board on letters issued to scheme managers and cohort allocations at the June SAB.

ACTION 6.3: CJ to report back to the Board at the June meeting once FRAs have responded to the letter regarding Matthews cohort allocation.

6.4 CJ provided an update on the Oversight Board, noting that, subject to agreeing commercials, XPS will deploy a team of 10 to WYPF to support Matthews delivery which will support work on the significant backlog of outstanding payments.

6.5 CJ also reported the successful launch of the member website, with subscription alert functionality under development. Finally, she noted progress on the Need for Change project, with working group meetings planned through the summer to explore future governance models.

6.6 MR raised concerns about inconsistencies in Appendix B, highlighting that some figures did not appear to align. CJ confirmed that the data shown is the raw information submitted directly by scheme managers, acknowledged the inconsistencies, and agreed that greater oversight and challenge is needed.

ACTION 6.6: LGA to review the raw Matthews data submitted by scheme managers, address the inconsistencies identified, and strengthen oversight and challenge of future submissions.

6.7 BA observed that it may be useful to issue some guidance to FRA's to improve the quality and consistency of the Matthews data provided.

6.8 CJ committed to scrutinising the responses received in the March submission. TA added that while many FRAs have provided helpful and relevant information, some responses differ from the majority, and that feedback could be shared with LGA ahead of the March request to support more consistent reporting.

6.9 JL raised concerns about the short window for calculating and paying Matthews interest and asked whether a more flexible approach could reduce delays. GAD agreed to explore whether any flexibility exists within the regulations.

ACTION 6.9: GAD to explore whether any flexibility exists within the Matthews interest rate regulations to help reduce payment delays.

7. SAB Governance Update

7.1 TA provided a brief overview of the Governance paper which had been shared in advance of the meeting.

7.2 TA asked the Board to consider two types of substitutes for Board meetings, one with observer status and one with full voting rights (subject to ministerial approval). If supported, updated terms of reference will be brought to the June meeting.

ACTION 7.2: SAB Secretariat to update the terms of reference to reflect the proposals for two substitute types and bring the revised document to the June meeting, subject to ministerial approval.

7.3 An update was provided by Tony Curry (TC), as Chair on the Local Pension Board Effectiveness Committee, including revised LPB guidance, updated terms of reference, issues emerging from the Chairs' Forum, challenges recruiting LPB employee representatives, and planned training sessions

7.4 The Board reviewed proposed amendments to the Risk Register, agreeing not to reduce certain likelihood scores at this stage due to ongoing risks, including LGA staffing uncertainty given the unresolved consultation on the Future Operating Model and incomplete data returns for the Sargeant optant out cohort. Cybersecurity reporting will be brought to the June meeting.

ACTION 7.4.1: Bring a cyber-security update for the Board website to the June meeting.

ACTION 7.4.2: Reassess the Risk Register items (including knowledge and understanding and Sargeant opted-out members) at the next scheduled review in September.

7.5 TA encouraged Board members who had not already done so, to complete the anonymous EDI survey. She advised that annual EDI training will be provided.

ACTION 7.5: SAB Secretariat to encourage Board members who have not yet completed the anonymous EDI survey to do so and publish policy.

8. Guest updates: Administrator Updates.

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

9. AOB: AWE Increases

9.1 CM shared a brief overview of First Actuarial's AWE Increases paper.

9.2 The item was noted. No questions raised.

JL closed the meeting at 15.23

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