

**Report**  
**FRA remedy self-assessment**  
**survey**

**Sept**~~Dec~~**ember**  
**2021**

Research Report

**Prepared for the Firefighters' Pensions (England)**  
**Scheme Advisory Board**

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# 1. Executive Summary

The survey invitation was issued by email to all Fire and Rescue Authorities (FRAs) following a public launch in May 2021. It was in the field from 20 May 2021 to 31 August 2021. The survey received a 100 per cent response rate, although not all FRAs answered all of the questions.

## 1.1 Current arrangements

Sixty per cent of FRAs are covered by just two providers in England. The number of single-FRA administrators is reducing as providers withdraw from the Firefighters' Pension Scheme (FPS) market due to the time and expertise required to administer the scheme.

Administration contracts began as early as 1940 and as recently as 2021. Over half of current arrangements are due to end within the next four years. Around one third of FRAs are planning to tender at the end of their current contract, with the most common routes to procurement being full tender and selection from a framework.

Preferences for future administration for the scheme were inconclusive. Half of respondents favoured retention of current arrangements or had no preference. Around one quarter preferred three or four "super" administrators, which will potentially occur reactively through natural attrition.

In most cases, delivery of the administration contract is overseen by a manager or head of department in human resources, finance, pensions, or payroll. posts are generally line-managed by a member of the senior leadership team.

## 1.2 Data

Eighty-five per cent of FRAs have started work to identify data requirements for age discrimination remedy, compared to just 28 per cent for the second FPS 2006 special members' exercise. This variance is reflective of the fact that the scope and mechanics of the second options exercise have not yet been established.

Work on remedies data is generally being led by a manager or head of department in human resources, finance, pensions, or payroll. Eighty-seven per cent of authorities expect to need additional resource for one or both of these projects.

Within the majority of FRAs, the ill-health retirement (IHR) process is managed by human resources and it appears that teams will be resourced to manage reassessment of cases that might be needed, as numbers are likely to be relatively small.

Just under half of FRAs have an in-house staff payroll service and around one quarter also provide pensioner payroll. Of the two-thirds who have outsourced pension payroll function, this is likely to sit with the pension administrator.

Over half of FRAs have changed either their payroll provider and/ or payroll system since the start of the remedy period in 2015, which may present additional challenge in obtaining historic payroll data. The number of years payroll records go back ranged from three to 40; for

employment records the range is zero to 50.

Challenges relating to data collection for age discrimination remedy were specified as conversion of records from final salary and CARE, and the time taken to complete the exercise. For special members, many FRAs are concerned that data will no longer be available for the periods in question, and that there would be difficulty in identifying and verifying individuals.

Both business as usual and remedy contribution adjustment processes will mainly be dealt with by payroll and finance teams. This also includes the corresponding adjustments to tax relief. FRAs acknowledged that different processes may need to be applied for different cohorts of member. A more collaborative approach to the interest process is envisaged, with departments working together to ensure the correct payments are made or deducted.

The majority of respondents (91 per cent) confirmed that they will be able to obtain or calculate backdated contribution data. Key themes identified in issues that might occur include available resource, lack of guidance, and impact on members.

### 1.3 Processes and impact

Confidence in existing tax processes for the purposes of recalculating pension growth for age discrimination remedy was split 50-50. Many FRAs identified that their administrator would be responsible for performing these calculations. Others commented that it was not possible to give an informed response until legislation and guidance is available.

Administrators were also reported to be primarily responsible for Event Reporting to HMRC.

At the time of the survey, it was anticipated that members would have to use Voluntary Scheme Pays (VSP) to settle any ordinary tax charges resulting from the remedy adjustments, therefore FRAs were asked if they had a VSP policy in place. Eighty-nine per cent have a policy and 11 per cent do not.

Almost all FRAs (94 per cent) have a nominated finance lead for pensions. Two-thirds expect to need additional resource to deal with financial adjustments and impact on business as usual. However, less than one quarter (22 per cent) of authorities have an allocated budget for direct and indirect remedy costs.

Sixty-three per cent have a nominated legal lead for pension matters and in 62 per cent of those cases, that person is the FRA's "nominated contact" for proceedings that are managed collectively by the LGA.

At almost all FRAs, workforce planning is managed by a member of senior human resources support staff or a uniformed equivalent. Eighty-nine per cent of FRAs confirmed that they are able to identify the cohort of members affected by age discrimination remedy and 83 per cent are modelling the potential impact into plans. Numbers range from between 15 to 4,000 members.

## 1.4 Information, communication, and coordination

In order to help member understanding of age discrimination remedy, FRAs indicated that a suite of member scenarios and online tools with a direct link to the pension administration system were the preferred options. Standalone tools such as a high-level modeller or other online solution were less popular.

Around half of FRAs are currently providing information to members, although this is primarily concerning immediate detriment or is generic information which has been circulated by the LGA.

All parties were felt to have a role to play in communications, with the LGA being the first choice to provide information at key points (70 per cent), administrators being the main contact for member queries (70 per cent), and FRAs providing information directly to the workforce (61 per cent).

FRAs had mixed views on coordination of remedy implementation, indicating a slight preference (33 per cent) for collaborative engagement with a shared administrator. Just under half of authorities have a remedy project team in place, which generally tend to include the administrator.

Communication for the first special members exercise was given an average rating of 5.93 out of 10, but whether this affected take-up rate was inconclusive. Key areas suggested for improvement in the second exercise were consistency of information and clear guidance.

## 1.5 Knowledge, capability, and capacity

FRAs measured their level of internal pensions knowledge and capacity at an average 5.67 out of 10. Popular options for addressing any shortfall were establishing new roles and accessing training.

Most FRAs (85 per cent) have included remedy implementation as a risk on their corporate register and subsequently reported it to their Local Pension Board.

The sector strongly agreed that the LGA are best placed to lead on policy engagement with government (98 per cent); on direct communication or provision of content (87 per cent); and on engagement with administrators (89 per cent). These responses give the LGA the necessary endorsement to lead on remedy related issues on behalf of FRAs and provide assurance that this is the preferred approach.

## 2. Introduction

In December 2018, the Court of Appeal judged that the ‘transitional protection’ offered to some members of the firefighters’ schemes as part of the 2015 public service pensions reforms gave rise to unlawful discrimination.

The Chief Secretary to the Treasury confirmed the requirement for a legal remedy across all public service pension schemes and a consultation was undertaken on the steps needed to address the discrimination.

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

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

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

These adjustments will require significant change to systems and processes in place and will involve a considerable amount of time and resource to implement. Bearing in mind the unique management and governance structure of the FPS where each FRA is the scheme manager with legal responsibility for running the scheme, and is required to appoint an administrator, implementation will present a specific set of challenges to the sector.

In addition, a second options exercise in relation to [FPS 2006 special members](#) (Matthews) is expected to take place, in which eligible individuals will be able to elect to extend membership beyond 1 July 2000 to any employment as a retained firefighter prior to that date. No timescales are known at this stage. However, Matthews will have a considerable impact in terms of time and resources needed.

Finally, the FPS administration market has seen a reduction in the number of providers in recent years, potentially due to the rising complexity of the FPS. Procurement options when tendering for new administration services are limited<sup>1</sup>.

As part of their statutory role to provide advice to scheme managers and Local Pension Boards (LPBs) relation to the efficient and effective administration and management of the Firefighters Pension Scheme, the Scheme Advisory Board wanted to understand more about arrangements for managing the pension scheme and specifically for implementing the age discrimination remedy.

Following a [paper to the Board on 10 December 2020](#), it was agreed that a survey would be issued to FRAs with the following objectives:

- The results of the survey will be used to determine whether FRAs have a preferred future model of administration and consider whether this is desirable and achievable.
- On implementation of remedy, the outcomes will illustrate how prepared FRAs are, what plans are in place, and where support is most needed.

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<sup>1</sup> [SAB 17 Sept 2020: Paper 2 Pension administration market and complexity](#)

## 3. Methodology

The survey was designed by the Scheme Advisory Board secretariat in conjunction with the SAB, based on an equivalent survey of scheme managers in the Police Pension Scheme. The questionnaire can be viewed at the following link: [FRA remedy self-assessment survey question set](#).

The survey was launched publicly on 20 May 2021 at a virtual SAB update event. All FRAs in England and Wales were invited by email to participate in the survey on the same date with a clear instruction that the survey should only be completed once per FRA by the delegated [scheme manager](#) or an appropriate representative of the delegated scheme manager. The survey was advertised in [FPS Bulletin 45 – May 2021](#) with the same instruction.

FRAs were provided with a PDF or Word version of the questionnaire to allow internal collaboration before the online Survey Monkey was completed.

### 3.1 Fieldwork

The survey was issued on 20 May 2021 with a closing date of 30 June 2021. Although the closing date was not officially extended, a number of FRAs applied for a short extension which was granted.

In order to ensure that all FRAs had opportunity to submit their views, the survey was not officially closed until 31 August, when the final response was received.

The survey received a 100 per cent response rate of the 44 FRAs in England and 3 FRAs in Wales, although not all FRAs answered all of the questions. The survey summary showed a 96 per cent completion rate at an average of 37 minutes to complete.

Two FRAs did not submit complete responses; one answered no questions beyond section 1 (current arrangements) and the second gave holding responses, for example typing random letters into free-text boxes where it was not possible to progress through the survey without providing an answer.

Throughout the report percentages in figures and tables may equate to more or less than 100 per cent due to rounding

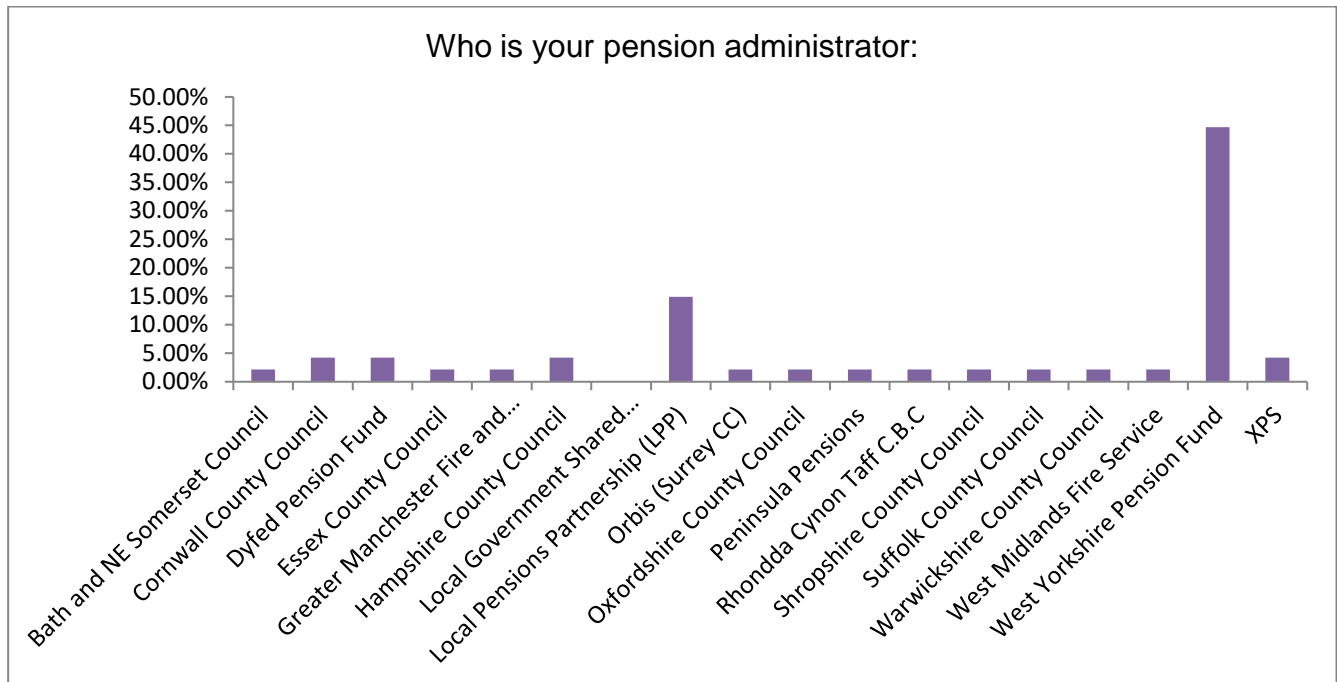
A list of FRAs is attached at [Annex A](#).

## 4. Research findings

### 4.1 Current arrangements

In this section we asked about pension administration arrangements and internal management reporting lines for pensions.

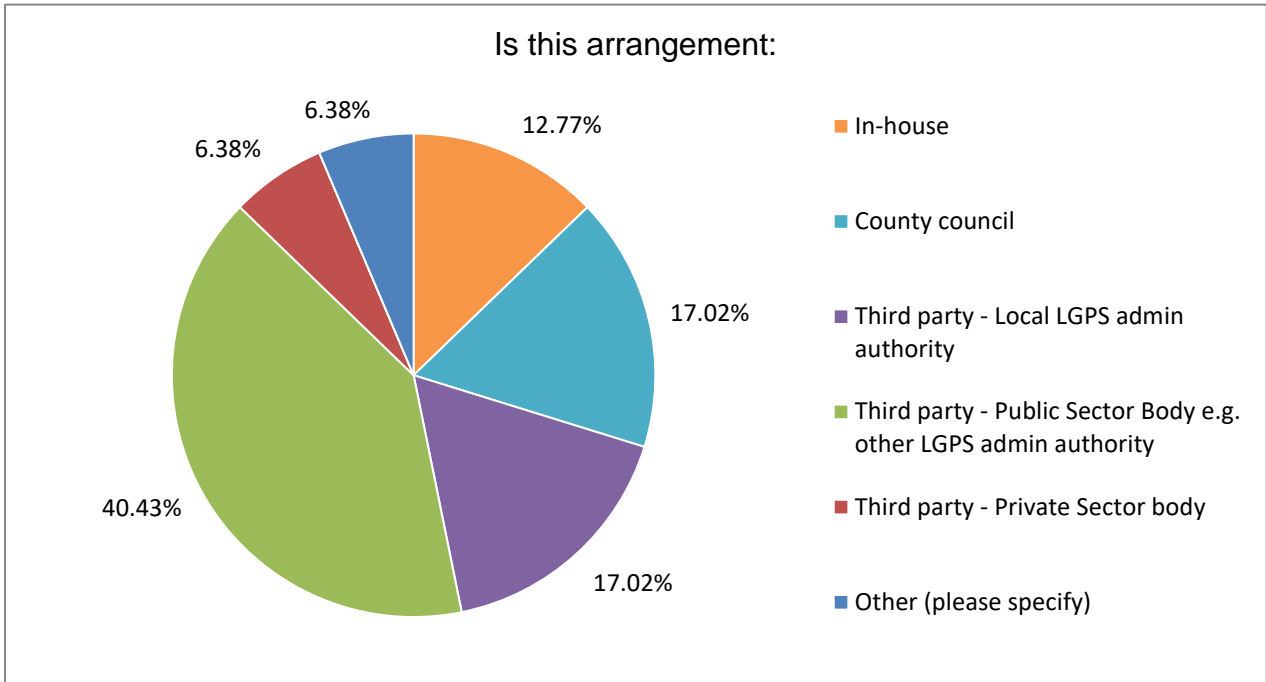
Almost 45 per cent of FRAs are administered by West Yorkshire Pension Fund. Local Pensions Partnership have a 15 per cent share of the market. Some administrators provide services to two FRAs and 11 administrators have a single FRA relationship. In the time that the survey was in the field, one administrator withdrew from the FPS market and another has withdrawn since the survey closed. One FRA is currently tendering for new administration services and the number of providers will reduce again ~~by one~~. This is clear evidence of the shrinking marketplace for FPS administration.



When asked to confirm the type of administration arrangements in place, there appeared to be a lack of clarity over terminology used as the individual responses did not align with our expectations. For example, six FRAs reported that their administration is carried out in-house, but there are only two authorities that are wholly administered in-house.

The main discrepancies seemed to occur between in-house and local LGPS fund, and county council and local LGPS fund, although the boundaries are less clear between the latter pair. The percentage of third party – other LGPS fund was broadly in line with expectations. Three FRAs selected other and noted that their administration is carried out as part of a shared service agreement. In hindsight, this would have been a useful addition to the dropdown menu.

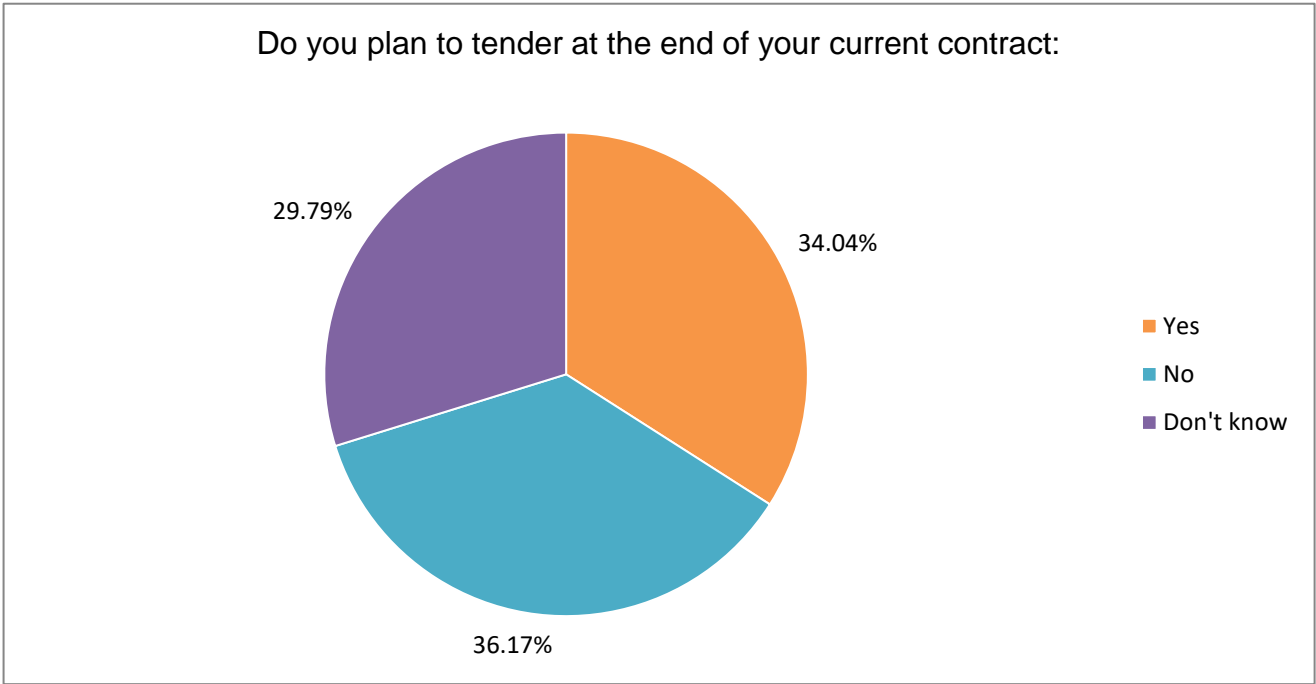




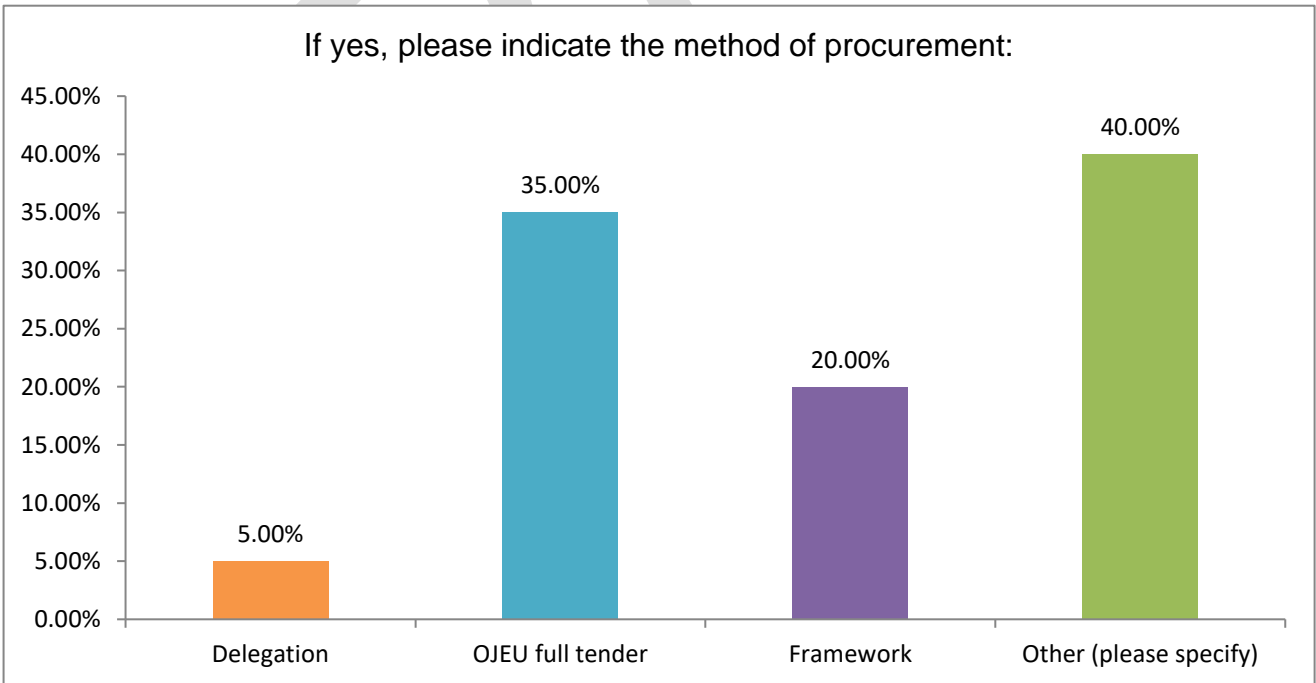
Dates that administration contracts started varied from 1940 to 2021. Five FRAs did not know when their current arrangement began.

Over half (54 per cent) of current administration arrangements are due to end within the next four years, and a further 9 per cent before 2030. Seven FRAs did not know this information and 11 reported that their arrangement is open-ended. There was no discernible pattern of FRAs with a particular administrator who do not have an end date to their contract. There is a possibility that smaller administrators will use this opportunity to relinquish their FPS contracts as it has been reported anecdotally that some struggle with the time and expertise needed to administer the scheme.

The split between FRAs planning to tender at the end of their current contract was fairly evenly distributed.

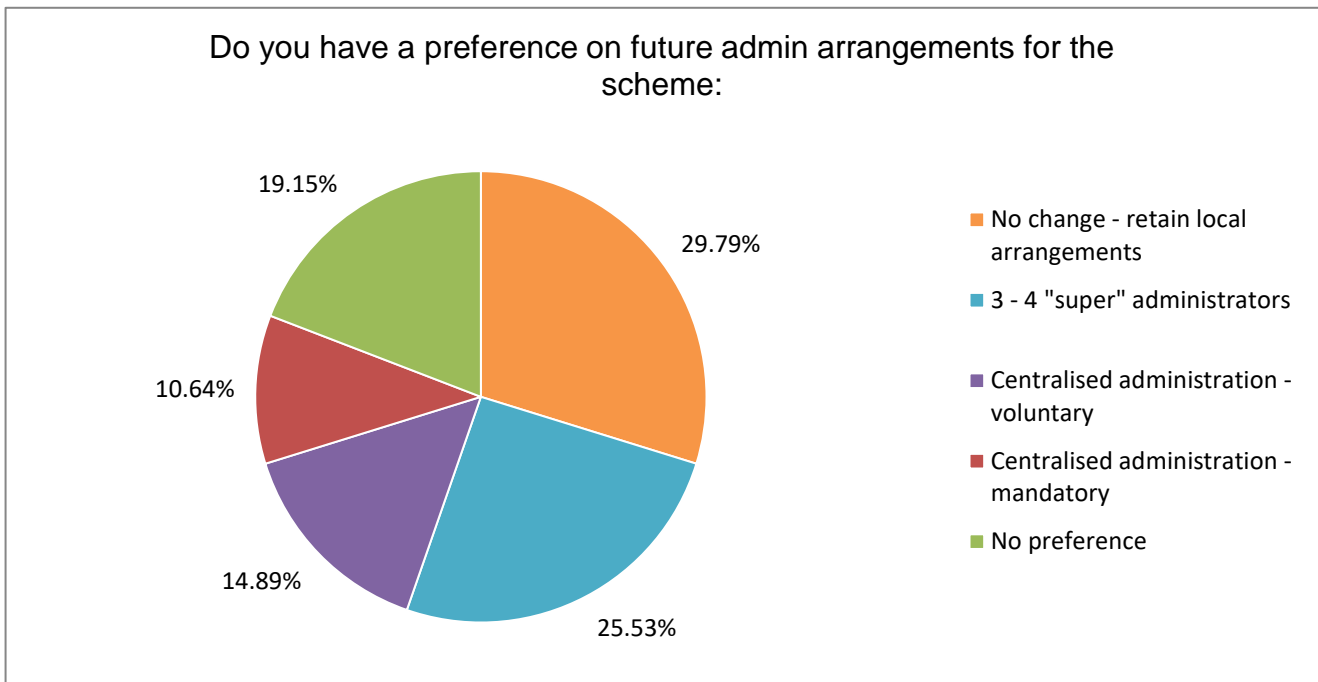


As noted, the routes to procurement for FRAs are limited. The options available are delegation, OJEU full tender, and framework. It should be noted that the only existing framework includes just one administrator who provides FPS services. Twenty FRAs provided a response to this question and there was no clear preference between the options. One respondent commented under “Other” that OJEU no longer exists but when tendering, the equivalent at that time will be used.



Given the complex structure and legislative background to the FPS, commentators have often speculated on whether there is an argument for centralising scheme administration. Over

recent years we have seen a gradual reactive shift towards one or two main providers, which would appear to support this suggestion. However, the responses to preference on future arrangements for the scheme were inconclusive, with almost 30 per cent wishing to retain local arrangements and 20 per cent expressing no preference. One-quarter preferred a smaller number of “super” administrators and around the same number stated that administration should be centralised, either on a voluntary or mandatory basis.



In order to establish and review internal controls, we asked FRAs what position oversees delivery of pension administration, and who line manages that post-holder. As a free-text field, the responses varied considerably. Lists of the responses are available at [Annex B](#) and [Annex C](#) respectively.

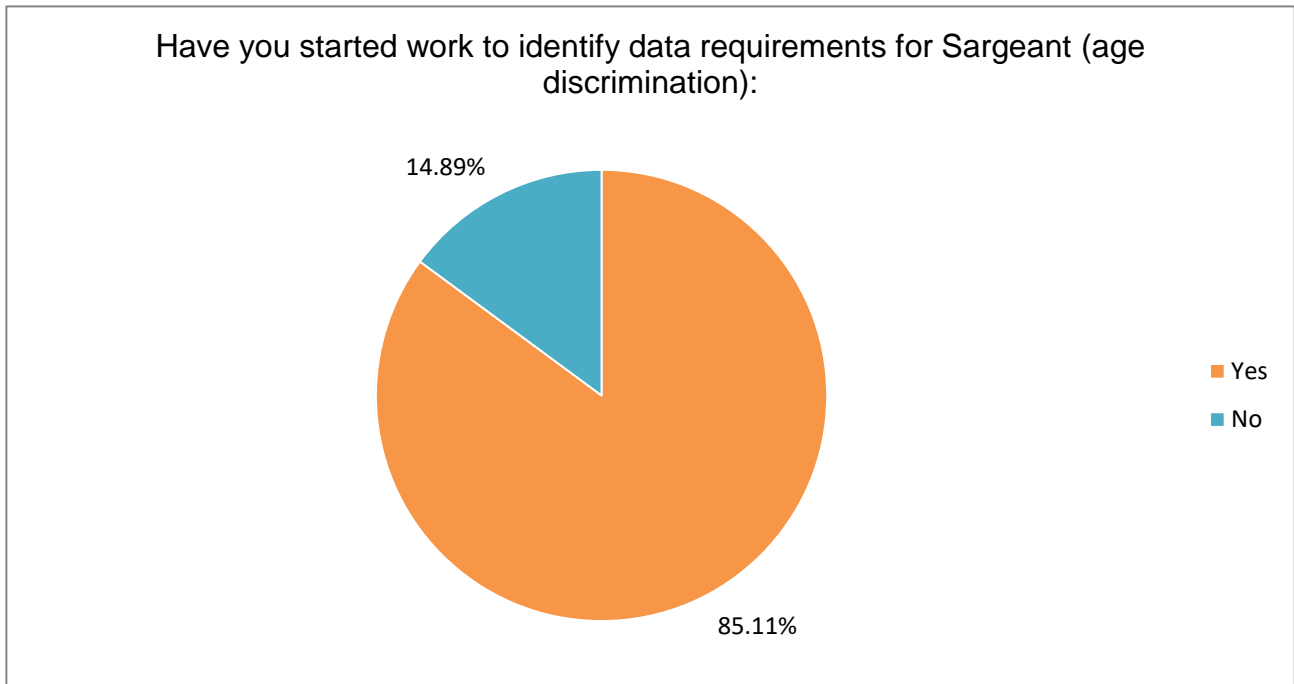
The majority of those overseeing the delivery of the administration contract are a manager or head of department in either human resources, finance, pensions, or payroll. These posts are generally line managed by a member of the senior leadership team, such as a director, or in many cases, the chief fire officer. This is broadly in line with our expectations for scheme manager delegation.

## 4.2 Data - pay, service, and contributions

### 4.2.1 General provisions

This section asked questions about FRA’s plans for managing data in Sargeant and Matthews.

Firstly, we asked whether FRAs had started work to identify data requirements for Sargeant in line with the [data collection tools](#) issued by the LGA. Eighty-five percent indicated that work had begun. Respondents were asked to comment on what key requirements or actions had been identified, or if they had not started, why that was the case.



Where a free-text response had been entered, the majority of FRAs indicated that work had begun to identify members eligible for remedy and how to obtain the necessary data, in collaboration with payroll providers and administrators. Others also identified that immediate detriment cases were being processed.

Key requirements were stated as further clarity on technical issues and additional resource.

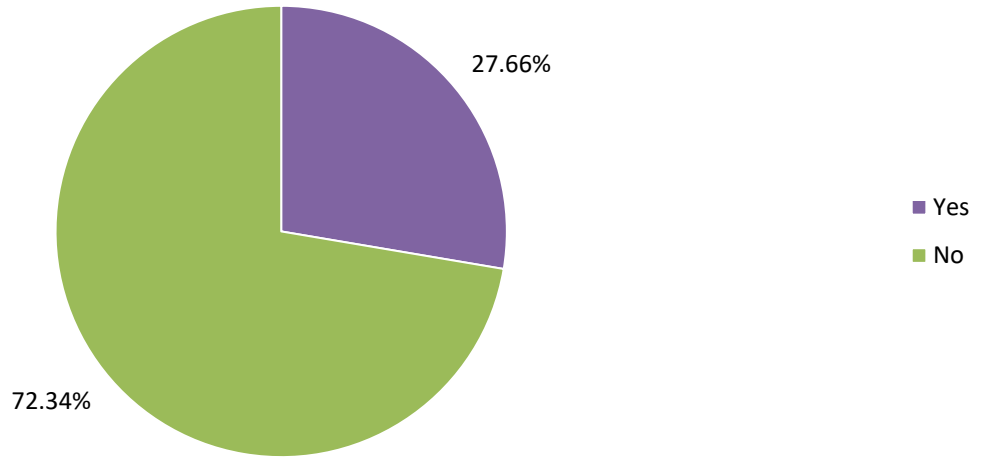
Of the seven FRAs that had not started work to identify data requirements, two commented that they were awaiting the software data extract, and one had been delayed due to transferring to a new pension administrator.

When asked the same question on data collection for Matthews, the percentage results were markedly different, with approximately three-quarters (72 per cent) stating that they had not started scoping requirements, and one-quarter (28 per cent) who had.

These findings were to be expected; as reflected in the additional commentary, there has been no confirmation yet as to eligibility or the mechanics of the exercise, as these details are still subject to legal negotiations. Many FRAs also identified that they are not sufficiently resourced to undertake two large-scale data interrogation exercises at the same time. One FRA confirmed that they do not have any retained firefighters and will therefore be exempt from the options exercise.

Of the minority who have started to look at what will be required, the detailed responses indicated a broad understanding of what will be needed and an intention to use the base data and communications from the first exercise as a starting point.

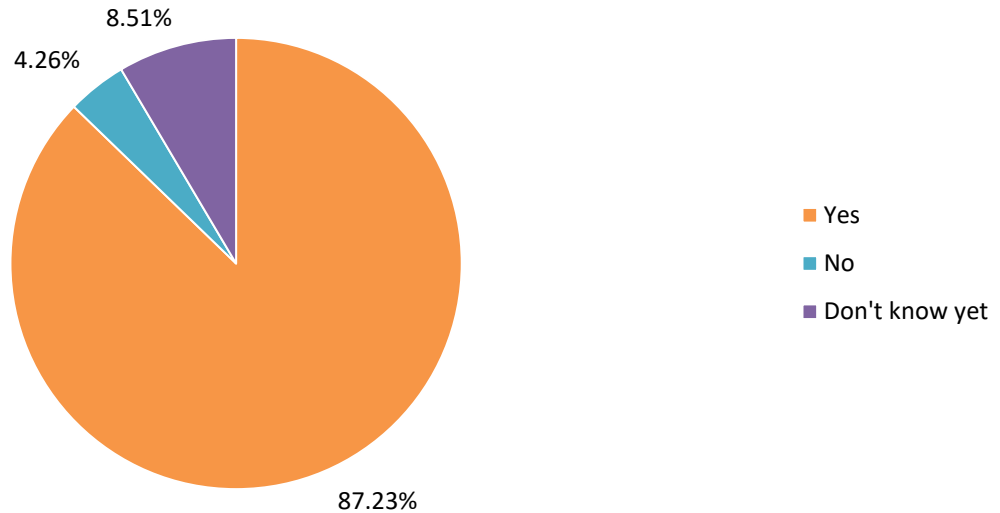
Have you started work to identify data requirements for Matthews (special members):



Perhaps unsurprisingly, 87 per cent of FRAs indicated that they expect to need additional resource to implement one or both projects. Of the two authorities that responded negatively, there is a high likelihood that their expectation is incorrect. One appears to have not given credible responses to the survey beyond the first section, as evidenced by input to free-text fields such as “joe bloggs”, and the other has stated that their administrator will implement remedy for them, which will almost certainly not be the case.

There was some correlation between FRAs who had not started data work for Sargeant and those who felt they would not need additional resource or did not know.

Do you expect to need additional resource for implementation for either or both of these projects:



To ascertain that remedy is being overseen at a senior level within an authority, we asked FRAs to confirm what position will lead on remedy data for both Sargeant and Matthews. Common responses were a manager or head of department in either human resources, finance, pensions, or payroll. It is again likely that this might be the delegated scheme manager and has been stated as such by some respondents.

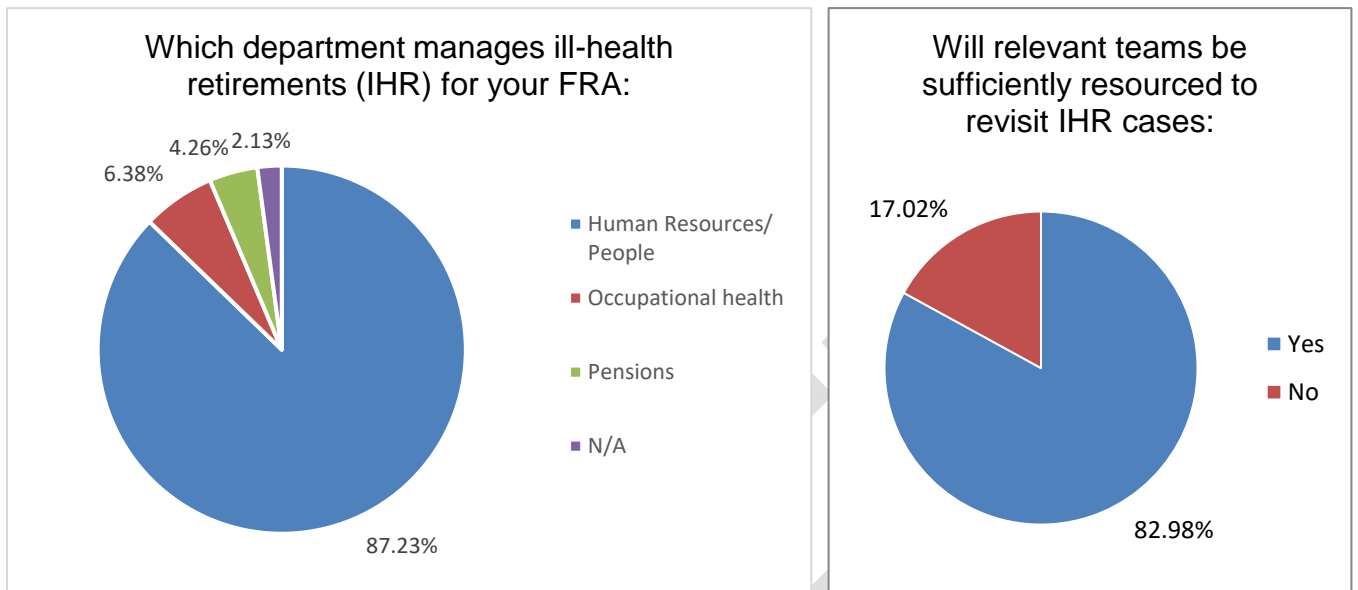
A list of the responses is available at [Annex D](#).

Moving on to specific requirements for age discrimination remedy, the HMT consultation response indicates that ill-health retirement (IHR) cases may need to be reassessed by an Independent Qualified Medical Practitioner (IQMP) against the member's opposite scheme to establish entitlement in that scheme.

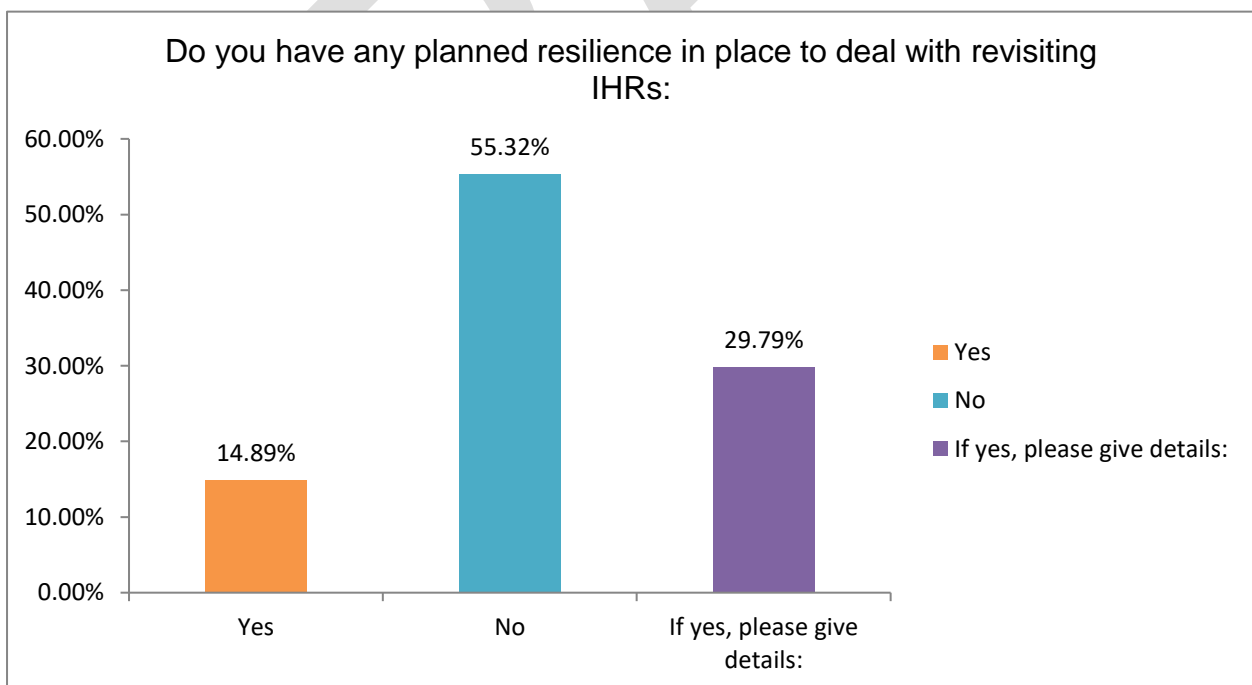
We asked FRAs to confirm which department manages IHR within the organisation and whether relevant teams will be sufficiently resourced to revisit these cases.

While the first of these questions invited a free-text response, answers tended to fall into one of four categories and so have been grouped into themes of human resources, occupational health, and pensions. One FRA gave a N/A response. "Human resources" or "People" was by far the most common answer at 87 per cent and this would be in line with our experience and expectation.

Eighty-three percent went on to confirm that relevant teams would be sufficiently resourced to manage reassessment of IHRs which is very positive. Despite the nature of a firefighter's employment, ill-health retirements are still relatively infrequent.



This statistic is borne out by the next question which asked whether FRAs had any planned resilience in place to deal with revisiting IHRs. While responses were split almost evenly between “yes” (45 per cent) and “no” (55 per cent), the detailed comments confirmed that the number of cases was likely to be small and requirements could therefore be met within existing resources.



If yes, please give details:
Small number of cases need to be revisited, additional resources available within the pension

activity
XPS have a working risk assessment register which monitors the project as a whole including legislation, policy, systems, data and resourcing.
We had identified 2 cases, which has already been reassessed
No resource currently available
Low numbers of IHR, not presently seen as a concern.
There aren't a significant number & will be met through the existing HR & Occupational Health provider
we have very few IHR cases
Additional trained department members.
Occupational Health
within existing team resources
extra resources obtained through McCloud/Sargent project
We have third party OH and pensions administration services.
Part of a wider Shared Services arrangement that has capacity
Additional resource not required due to the small number of cases

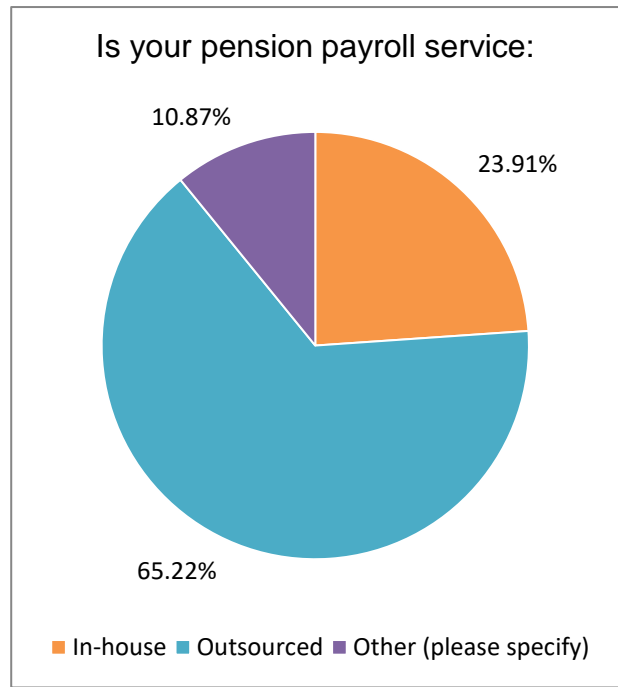
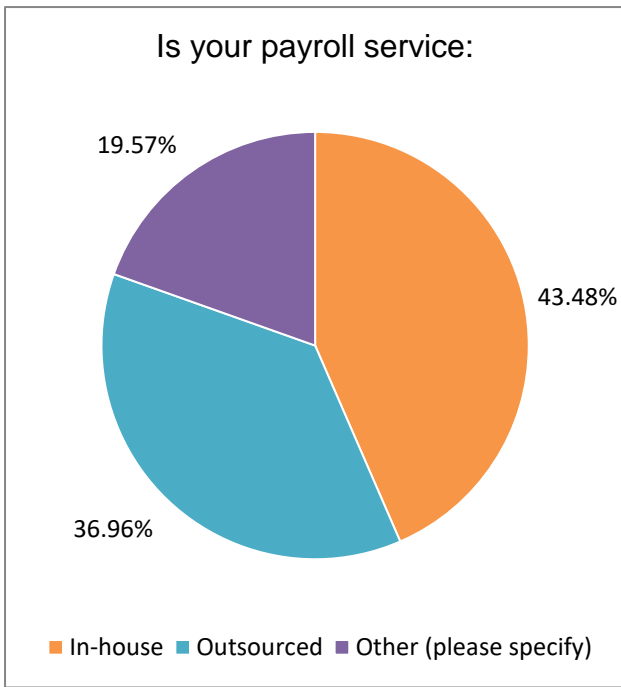
#### 4.2.2 Pay and employment data

The next section sought information about FRAs' payroll data and services and employment records to establish how easily data might be obtained and identify any additional processes or collaboration that would be needed.

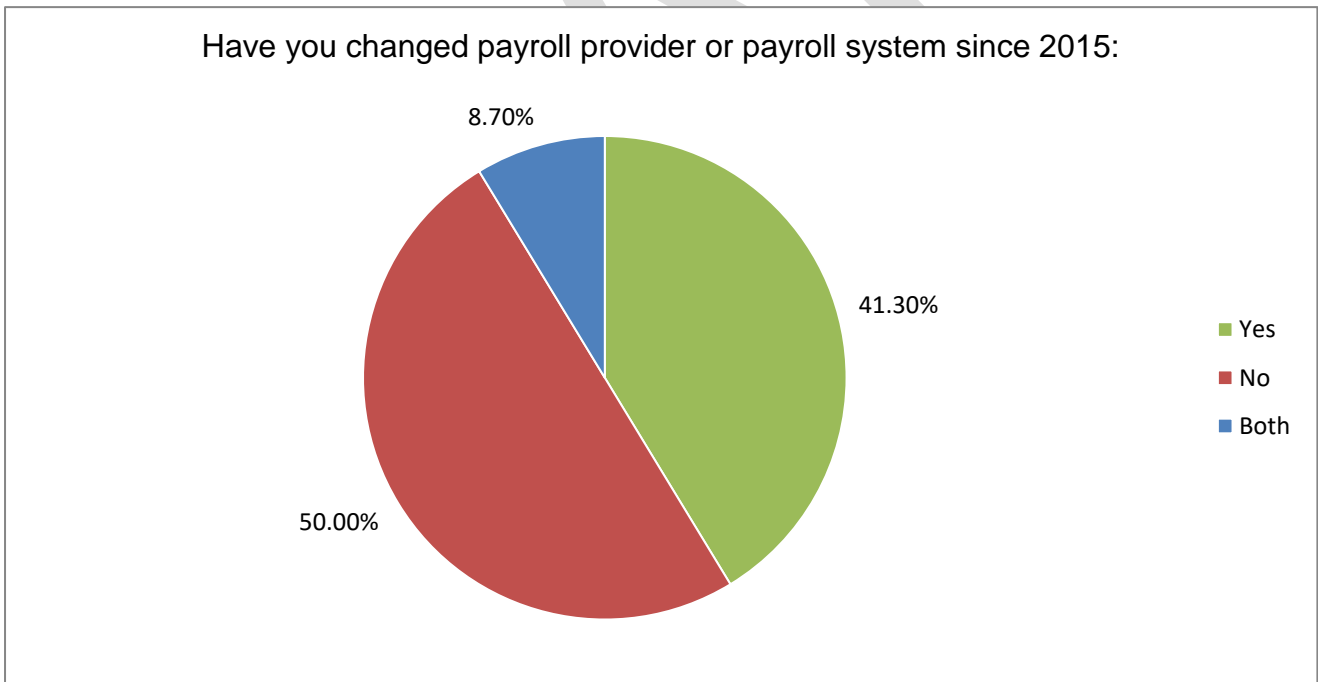
Forty-three per cent of FRAs have an in-house payroll service, compared to 24 per cent for pension payroll. Accordingly, 37 per cent have outsourced their payroll function for employees, but 65 per cent have an outsourced pensioner payroll. In many cases, this will be outsourced to the pension administrator.

For the 20 per cent who indicated "other" for payroll service, this was specified as a hybrid arrangement or as part of a shared service; and for pension payroll, 11 percent of "other" was defined as a shared service or part of the pension administration service.





Over Half of FRAs have changed either their payroll provider and/ or payroll system since the start of the remedy period in 2015, which may present additional challenge in obtaining historic payroll data.



The number of years that payroll records go back ranged from three to 40, with a mean value of 16.

FRAs were asked to detail any problems they could foresee with obtaining pay data for Sargeant and Matthews, noting that pay data for age discrimination will date back to 2015 and for the second special members options exercise could be as early as the 1970s.

While some FRAs did not anticipate any difficulties with collating the necessary data for Sargeant, others stated that creating schedules of alternate contributions and differences in pensionable pay between final salary and CARE schemes would cause complexity. Some FRAs commented that changing systems or providers would create additional challenge, as noted above, and further, that collating data from multiple sources may lead to inaccuracies.

Several FRAs noted that while obtaining the remedy data in itself would not be difficult, it would be time-consuming.

Collection of relevant data for Matthews is clearly deemed to be more challenging. The majority of respondents expressed concern that data will no longer be available for the periods in question, and that there would be difficulty in identifying and verifying all eligible individuals. Some FRAs added that although they may have some archive information available, it is unlikely to be in electronic format, for example hard copy ledgers or microfiche.

A full breakdown of the free-text responses is available at [Annex E](#).

Additionally, for Matthews, as eligible individuals will have the opportunity to purchase FPS 2006 membership from the start date of their employment, FRAs were asked to indicate how many years their employment records go back. Here the number of years ranged from zero to 50, with a mean average of 21.

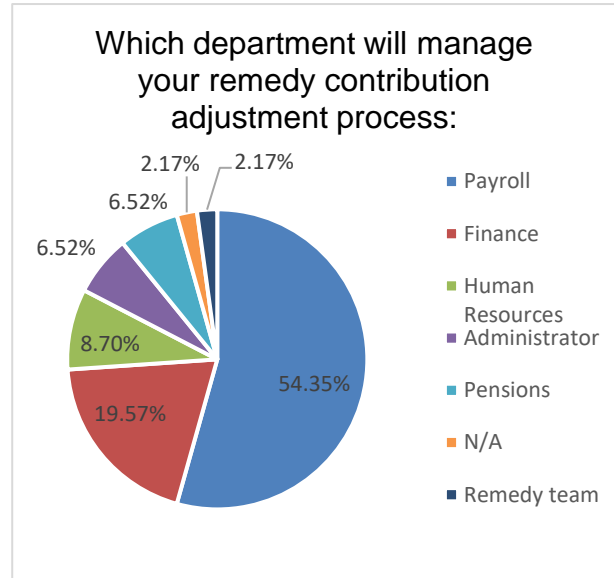
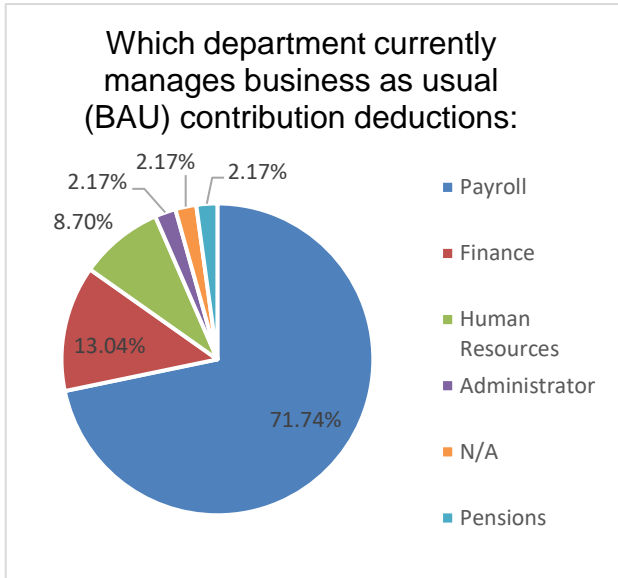
### 4.2.3 Contribution data

Finally in this section, we asked FRAs to explain their plans for managing the contribution adjustments that will be required for all members who are eligible for age discrimination remedy. These adjustments will need to be done when member's benefits are converted from CARE to final salary for the remedy period, and potentially again at retirement, if the person elects to receive their deferred choice underpin of reformed benefits.

We asked FRAs to specify which department currently manages business as usual contribution deductions and which department will manage the remedy contribution adjustment process, to test thinking and establish any common themes.

The free-text responses were again grouped by category and while the categories were similar across both questions, the percentage split varied. "Payroll" and "Finance" were the most common replies to both questions, with the remainder split between a dedicated pensions department or HR.

Although the results were broadly comparable, FRAs acknowledged within their responses that input from different departments or different processes for different cohorts of member would be necessary, for example, payroll for active members and the administrator for deferred and pensioner members where an employment relationship no longer exists.



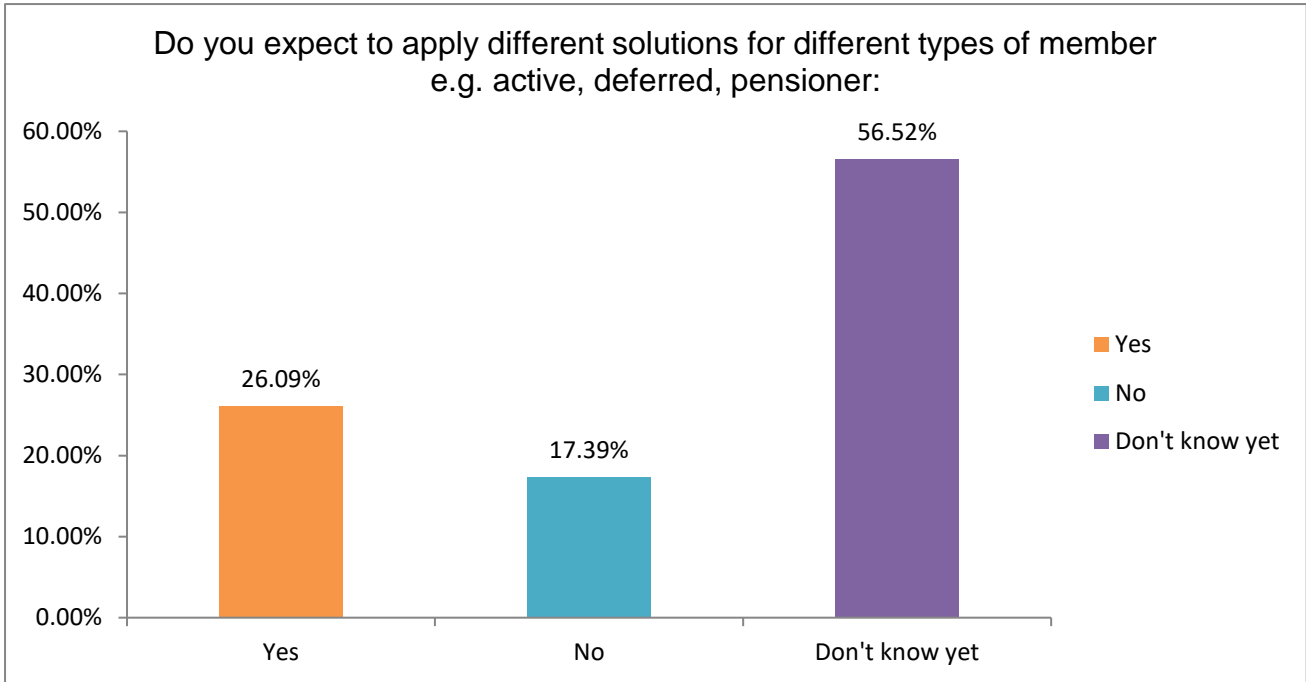
The results were less conclusive when authorities were asked directly if they expected to apply different solutions for different types of members. Here, over 50 per cent said that they did not yet know.

Respondents were asked to give more detail if they answered “yes”; this would more helpfully have been extended to also include the “no” responses. Where differences were identified, FRAs noted that tax relief can only be given at source for active members, therefore a different process would apply for pensioners and deferred members:

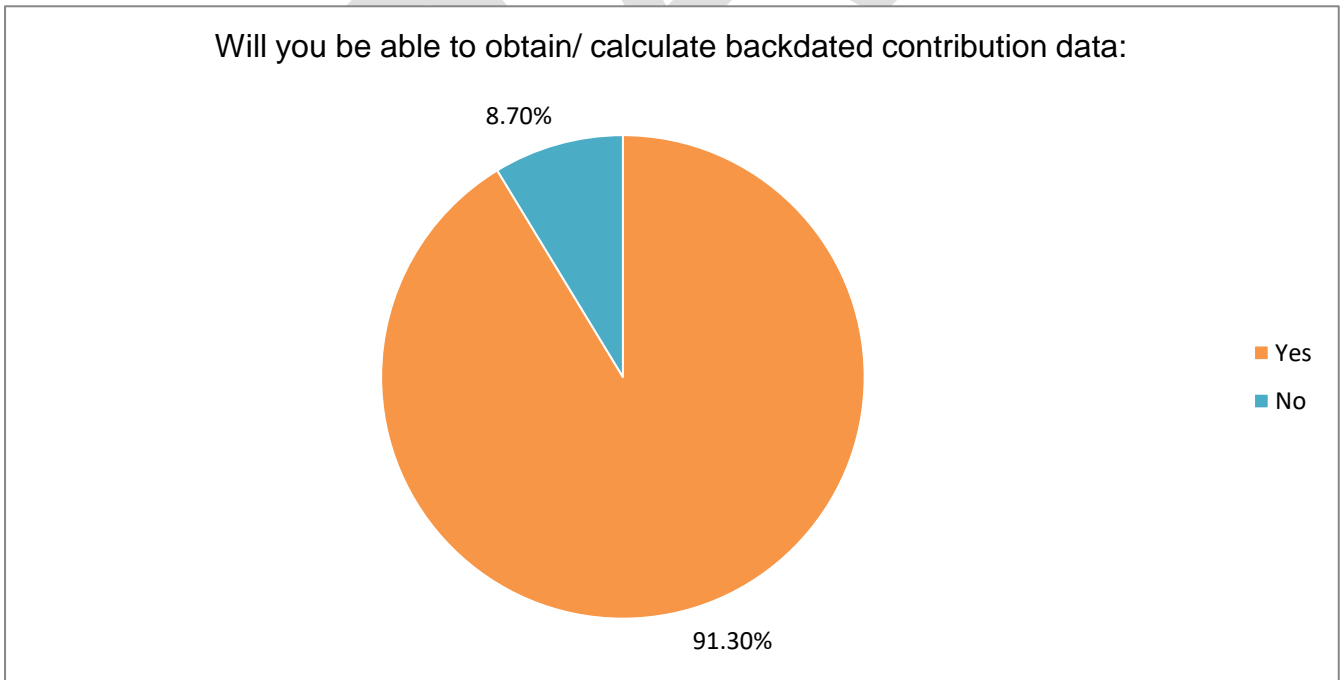
*“Only active members’ contributions can be collected or refunded via payroll, giving tax relief at source. For deferreds and pensioners, contributions could be collected by the AR department or by the administrator as a deduction from pension payable. The Regulations should make clear what method is appropriate. Contributions cannot be collected until after the member has made his/her choice.”*

Respondents also commented on differing personal circumstances and expressed concern over affordability.

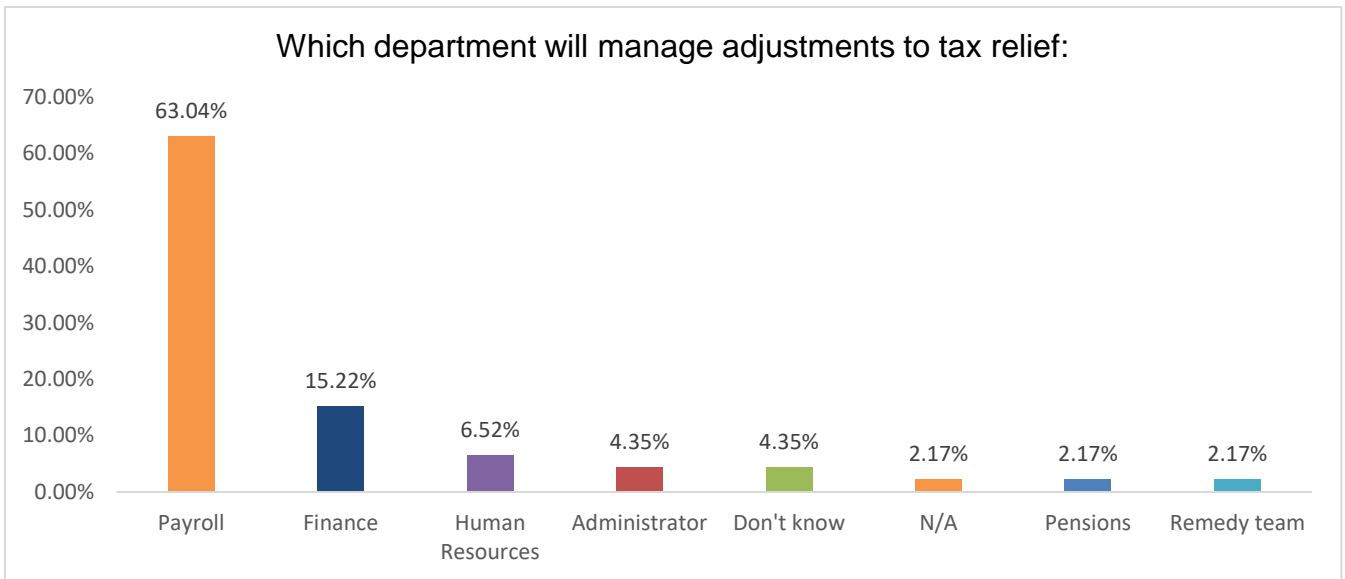
There appeared to be some confusion between legislative remedy and immediate detriment cases processed before regulations and software are in place; for clarity, immediate detriment is not within the scope of this survey.



Despite this uncertainty, 91 per cent of respondents indicated that they will be able to obtain or calculate backdated contribution data. It would have been useful to understand why the remaining 9 per cent, equivalent to four FRAs, felt that this will not be the case; unfortunately, this additional information was not requested.

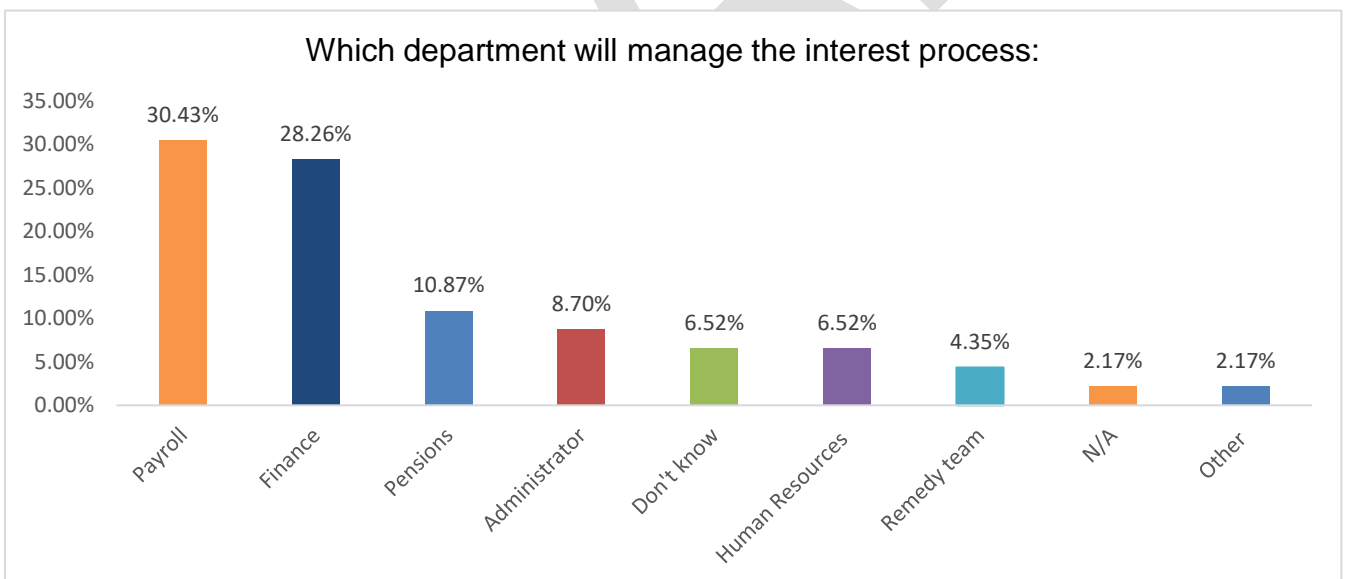


Adjustments of contributions at either point in the remedy process will necessitate corresponding adjustments to tax relief. Sixty-three per cent of FRAs confirmed that these adjustments will be managed by the payroll department, whether this is in-house or outsourced. Some FRAs indicated that this may also depend on the cohort of member.



The HMT consultation response indicates that interest will be due on amounts paid by schemes to members, and vice-versa. This will include on contributions adjustments. Here, 30 per cent of FRAs stated that payroll departments will manage the interest process, while 28 per cent indicated that finance teams would be responsible.

A more collaborative approach to the interest process is envisaged, with departments working together to ensure the correct payments are made or deducted.



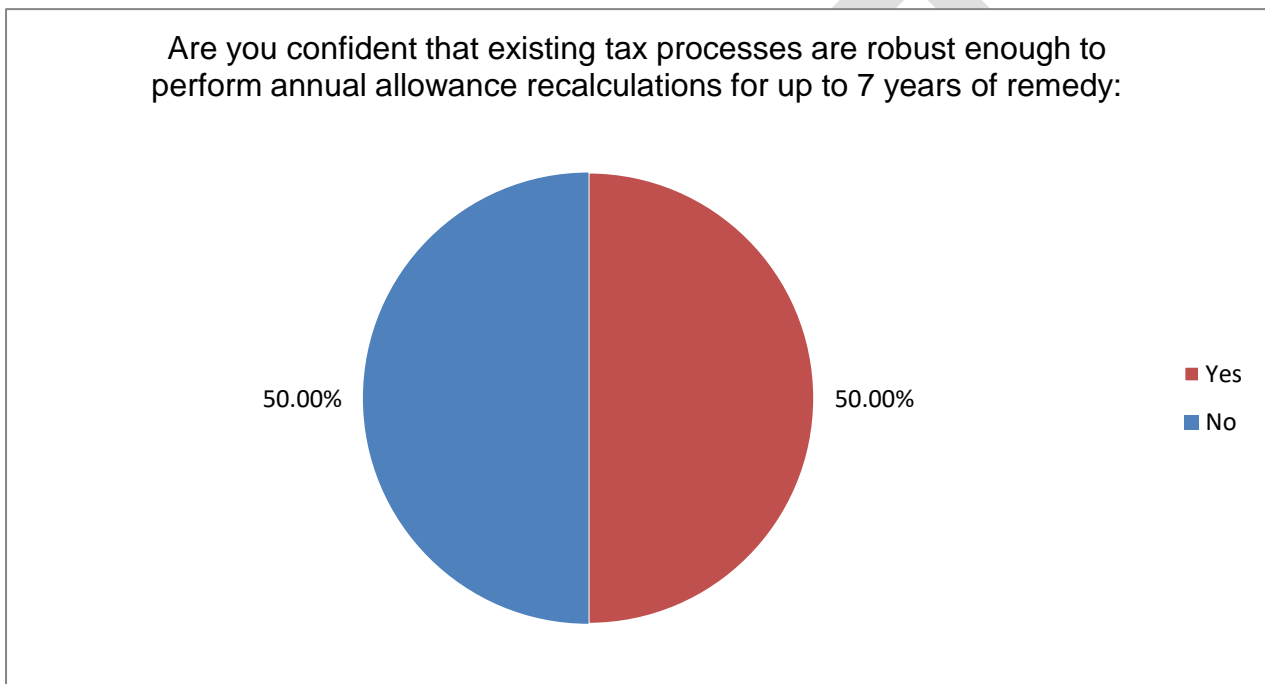
Finally, FRAs were asked to detail any issues that they thought might occur with adjustments of contributions. A wide range of responses were received, and the free-text comments are available at [Annex F](#). Key themes included available resource, lack of guidance, and impact on individual members.

## 4.3 Processes and impact

### 4.3.1 Pensions tax adjustments

In addition to tax relief implications, pensions growth will also need to be recalculated for the remedy period which may lead to new breaches of the annual allowance and lifetime allowance tax limits.

When asked whether they are confident that existing tax processes are robust enough to perform annual allowance recalculations for to seven years of remedy, FRAs returned a perfect 50-50 split.



Those that responded negatively were asked to provide details of any changes that would be required to systems or processes. Many FRAs identified that the administrator would be responsible for performing these calculations, so they were unsure as to the level of confidence. Others commented that it was not possible to give an informed response until legislation and guidance is available, which in turn will inform the level of software automation.

Multiple FRAs noted that the consultation response indicated the government's intent that members would not incur any extraordinary annual allowance charges that they would not have incurred but for remedy and felt that this question suggested this would not be the case.

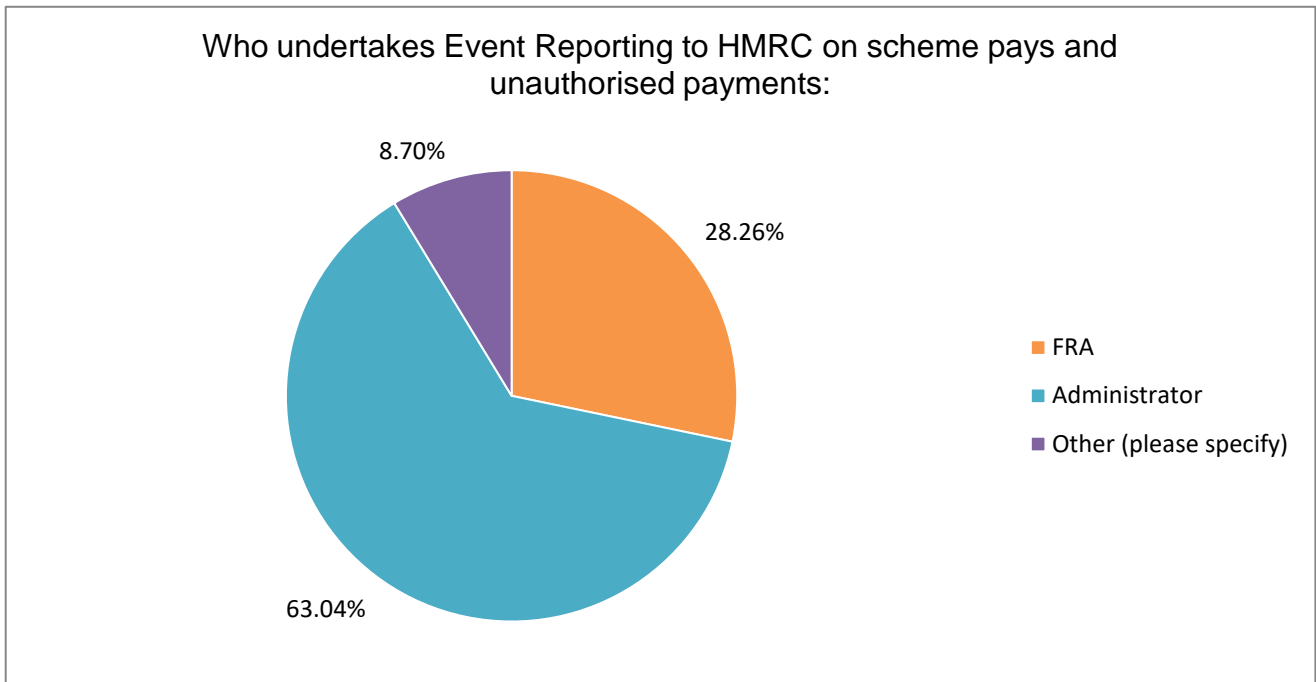
Paragraph 2.93<sup>2</sup> confirms that members electing for reformed scheme benefits at retirement will not bear any additional annual allowance charge that is a direct result of them exercising that choice. The question was a genuine enquiry and not intended to suggest anything contrary to the government's position.

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<sup>2</sup> [Public Service Pensions: Government response to consultation](#)

Administrators were also reported to be primarily responsible for Event Reporting to HMRC on Scheme Pays (whereby the scheme pays a tax charge to HMRC on behalf of the member which is then reclaimed as a deduction from annual pension) and unauthorised payments (for example where a lump sum exceeds the permitted tax-free maximum).

It is possible that these types of reportable events may increase as a consequence of remedy implementation.



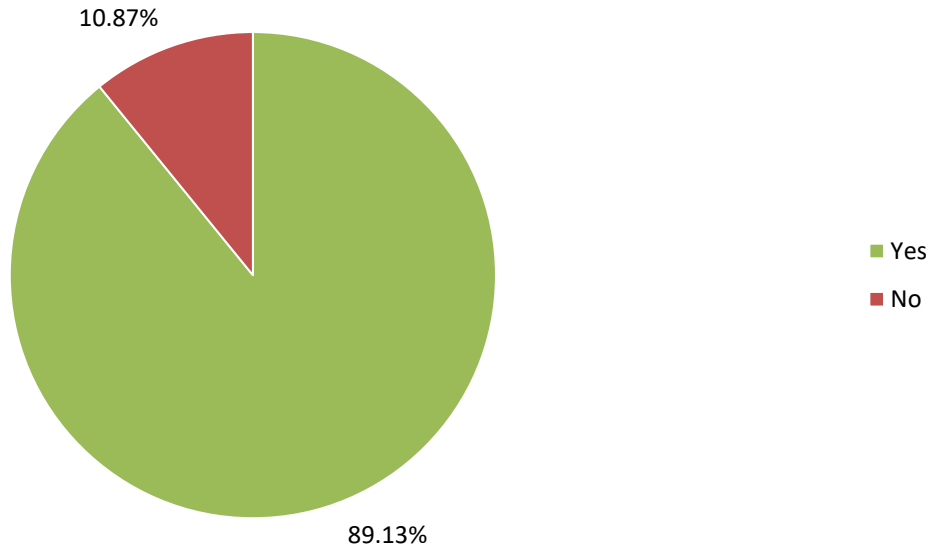
There are [two types of scheme pays arrangements](#): Mandatory Scheme Pays (MSP), which can only apply in certain circumstances, and Voluntary Scheme Pays (VSP) which offers more flexibility.

At the time of the survey, it was only anticipated that VSP would be able to be used by members to settle tax charges following the remedy adjustments, therefore FRAs were asked if they had a VSP policy in place. Eighty-nine per cent have a policy and 11 per cent do not.

On 20 July 2021, [HMRC published a policy paper](#) and [draft regulations proposing to extend the MSP deadline](#) for members whose pension input amount is retrospectively changed. This will allow members whose annual allowance position for a previous tax year has been changed retrospectively to use MSP.

These changes are intended to come into force on 6 April 2022 and be backdated to 6 April 2016.

Does your FRA have a voluntary scheme pays (VSP) policy in place:

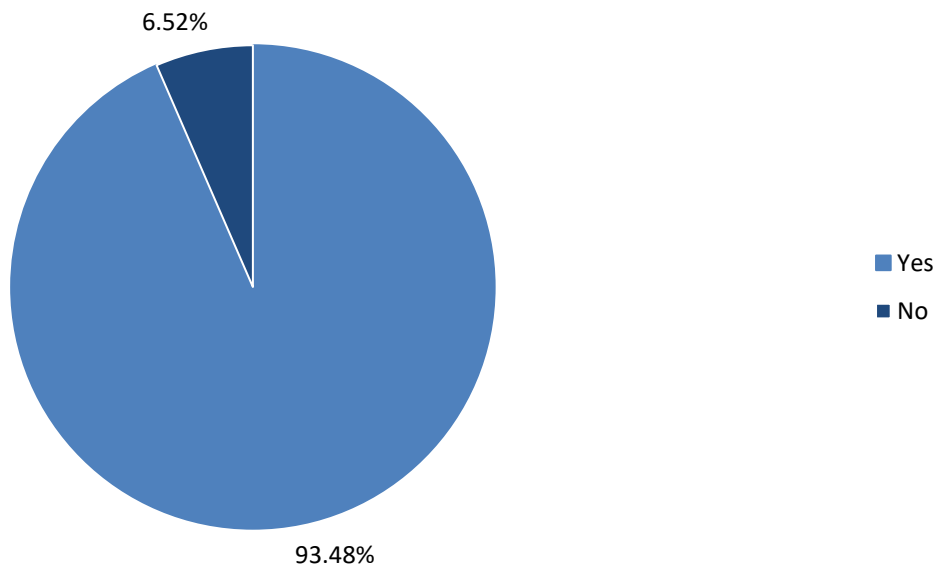


### 4.3.2 Financial processes

It is expected that financial processes will be impacted by remedy and that there may be associated budgetary costs. The questions in this section relate to an FRAs resources to deal with financial impacts.

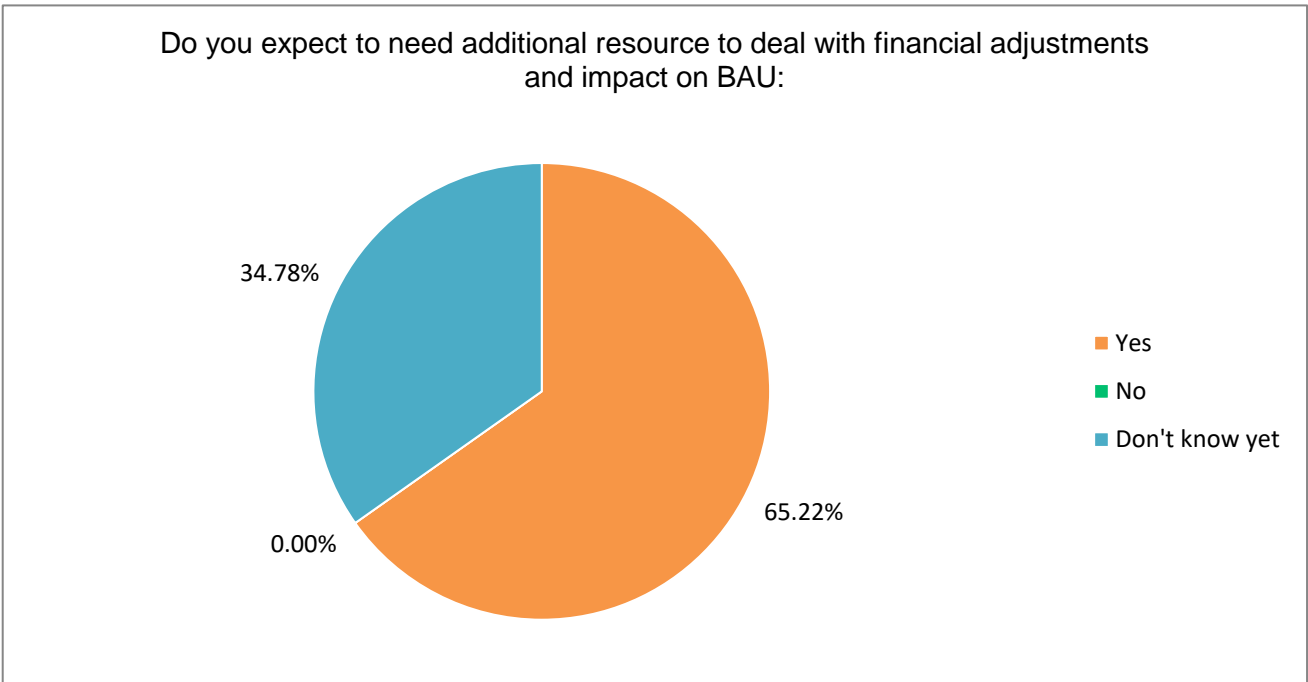
Almost all FRAs (94 per cent) have a nominated finance lead for pensions.

Do you have a nominated finance lead on pensions:

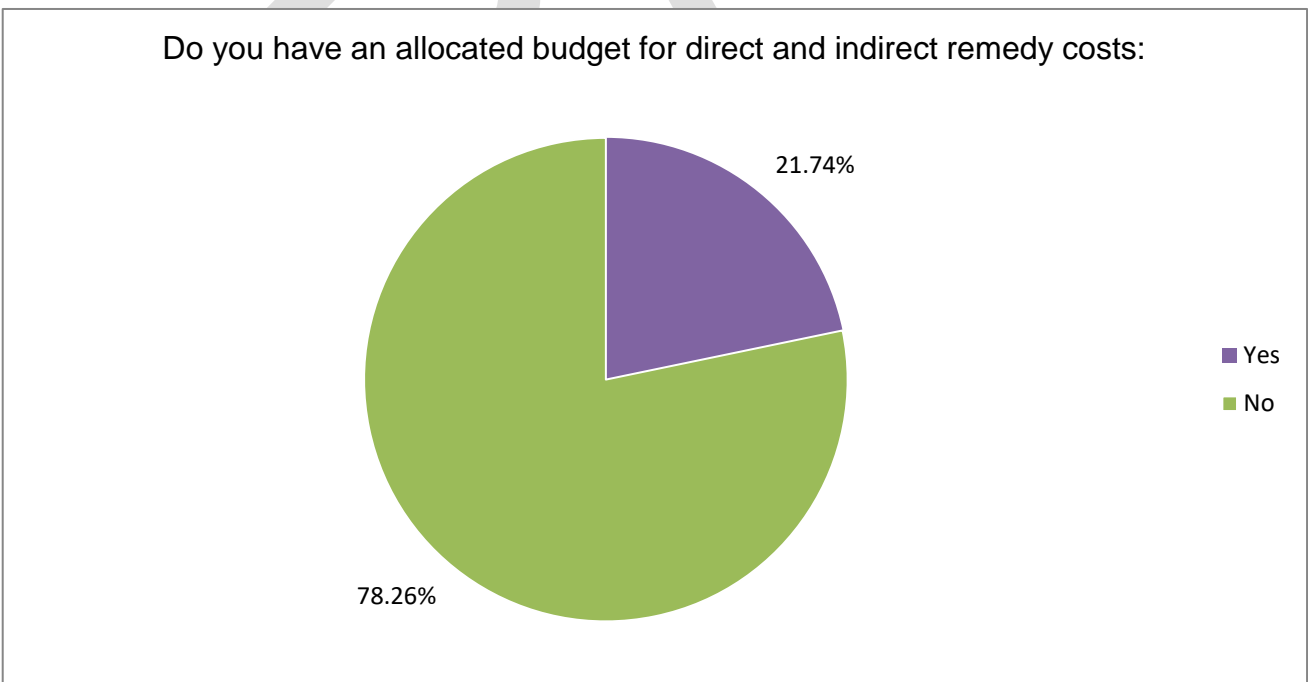




Sixty-five per cent of FRAs expect to need additional resource to deal with financial adjustments and impact on business as usual. Tellingly, the remaining 35 per cent answered “don’t know yet” rather than “no”.



Less than one quarter (22 per cent) of authorities have an allocated budget for direct and indirect remedy costs. Now that we have greater clarity over the requirements and scope of remedy with the introduction of the [Public Service Pensions and Judicial Offices Bill](#), it would be interesting to establish whether this position has changed.



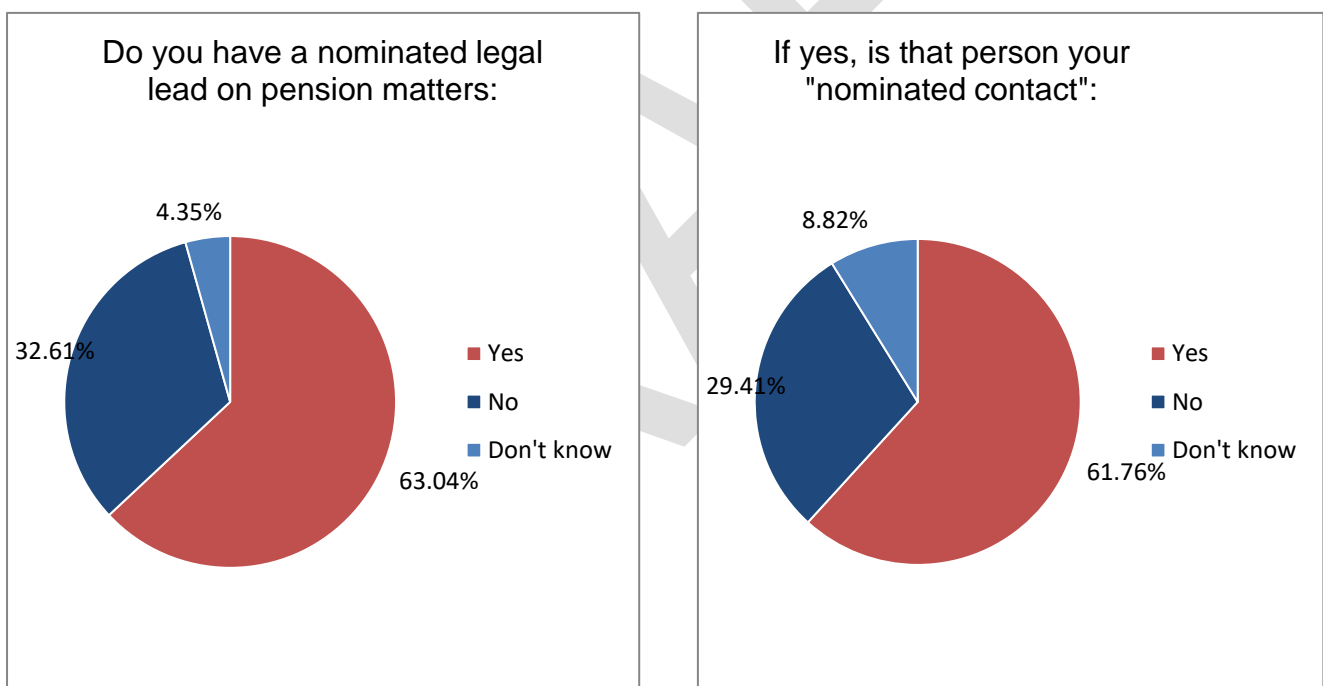
### 4.3.3 Legal processes

It is likely that FRAs will need legal support on a range of remedy processes such as immediate detriment, reviewing and processing remedy compensation payments, and complex cases (for example divorce, survivor benefits, contingent decisions). FRAs were asked two questions to help us understand whether this support is in place.

Sixty-three per cent have a nominated legal lead for pension matters and in 62 per cent of those cases, that person is the FRA's "nominated contact" for the proceedings in Sargeant that are managed collectively by the LGA.

Unfortunately, no further data or commentary was requested, as it would have been beneficial to understand why the correlation here was not greater. There did not appear to be any pattern to size or type of FRA with a legal lead in place, and there was at least one instance where a negative response was given to the first question, and a positive response to the second.

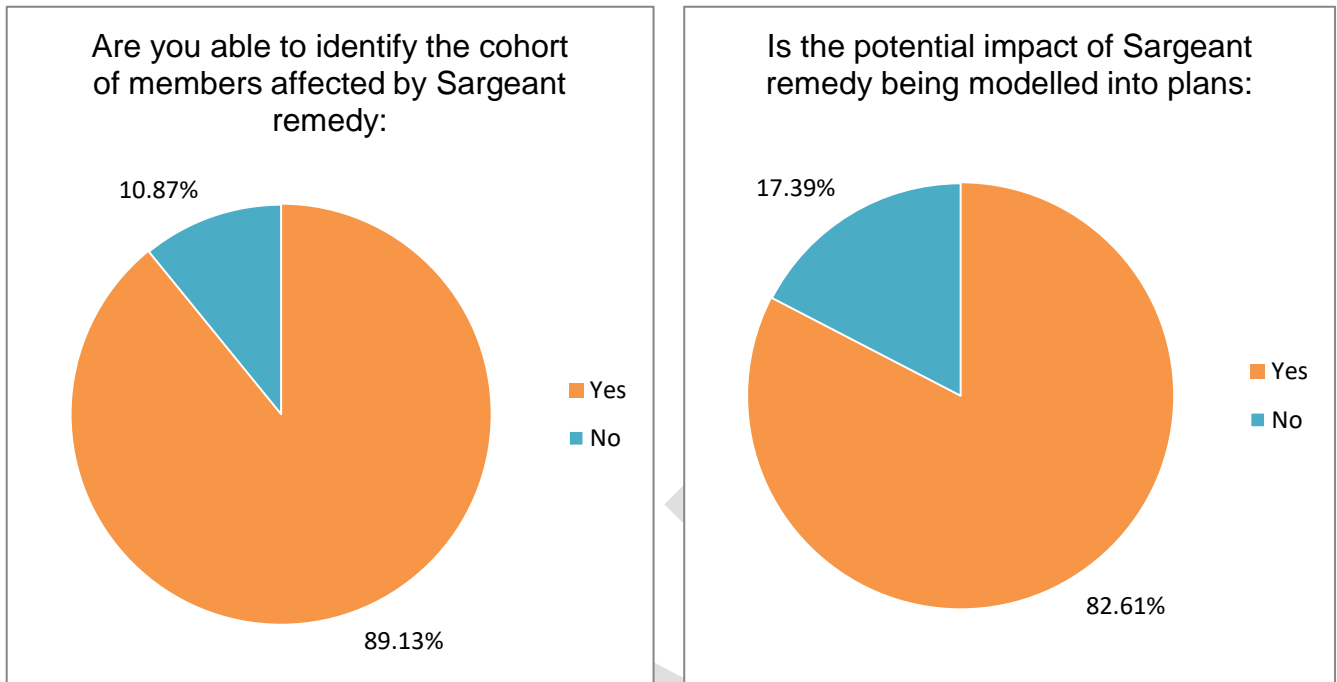
However, FRAs seem broadly to have the legal support that is needed in place.



### 4.3.4 Workforce planning

As members will have more flexibility over when they retire under remedy, workforce planning may be affected. FRAs were asked if they were prepared for this, firstly by establishing who leads on workforce planning and retention for each authority. While a wide range of free-text responses were received, in almost all instances, the post holder is a member of senior human resources staff or a uniformed equivalent, for example, Area Manager People & Organisational Development. The full list of responses is available at [Annex G](#). Names of specific individuals have been removed.

Eighty-nine per cent of FRAs confirmed that they are able to identify the cohort of members affected by age discrimination remedy and 83 per cent are modelling the potential impact into plans.



From the 35 FRAs who confirmed approximate numbers, the cohort varied from 15 to 4,000 members. There were some inconsistencies in the data provided. For example, one FRA separated out immediate detriment cases, and one only gave the year one figure. However, the [variance](#) illustrates the wide-ranging impact of remedy.

#### 4.4 Information, communication, and coordination

The questions in this section were intended to help us understand what types of communication FRAs would like to see and sought views on the co-ordination of age discrimination remedy across FRAs in England.

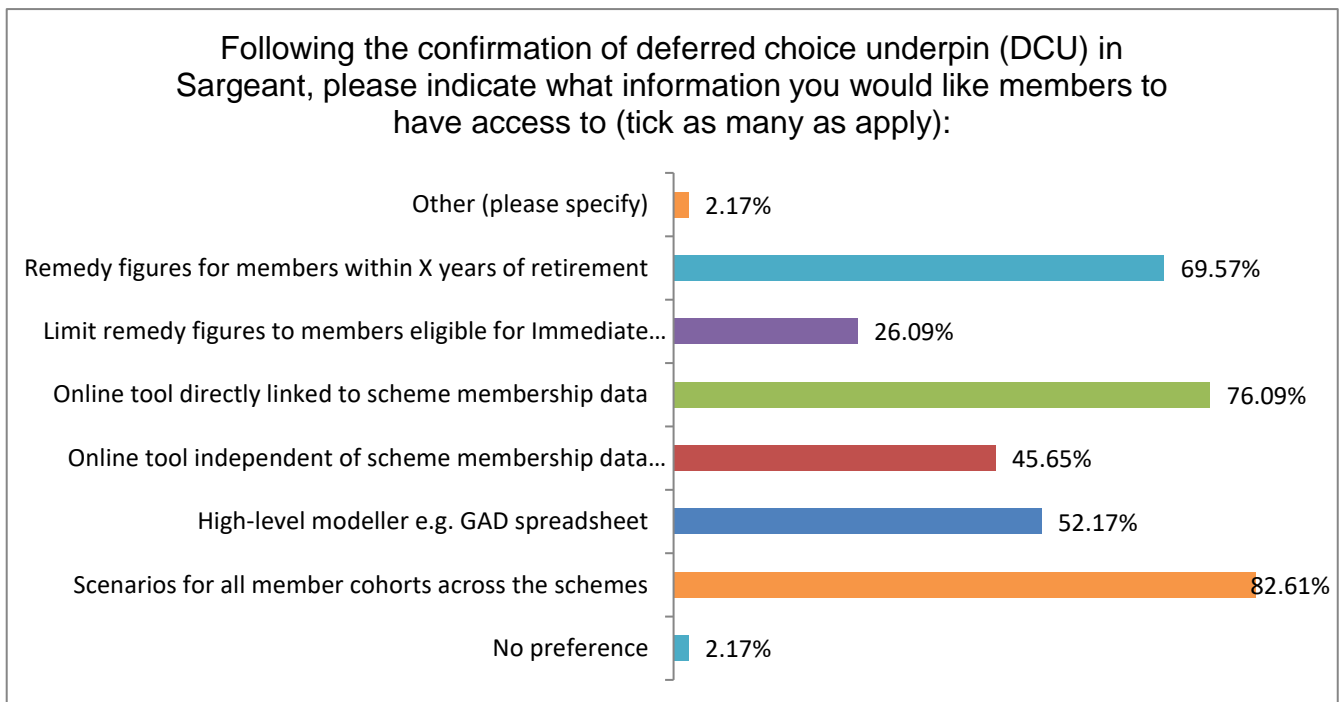
Questions were also asked about communications in the first special members options exercise in 2014-15, and how these could be improved.

FRAs were invited to indicate from a list of options what information they would like members to have access to in order to understand the impact of remedy. The list was caveated to confirm that it was not a guarantee of delivery of any of the options but was intended to allow us to understand individual FRA preferences when considering budget and resources.

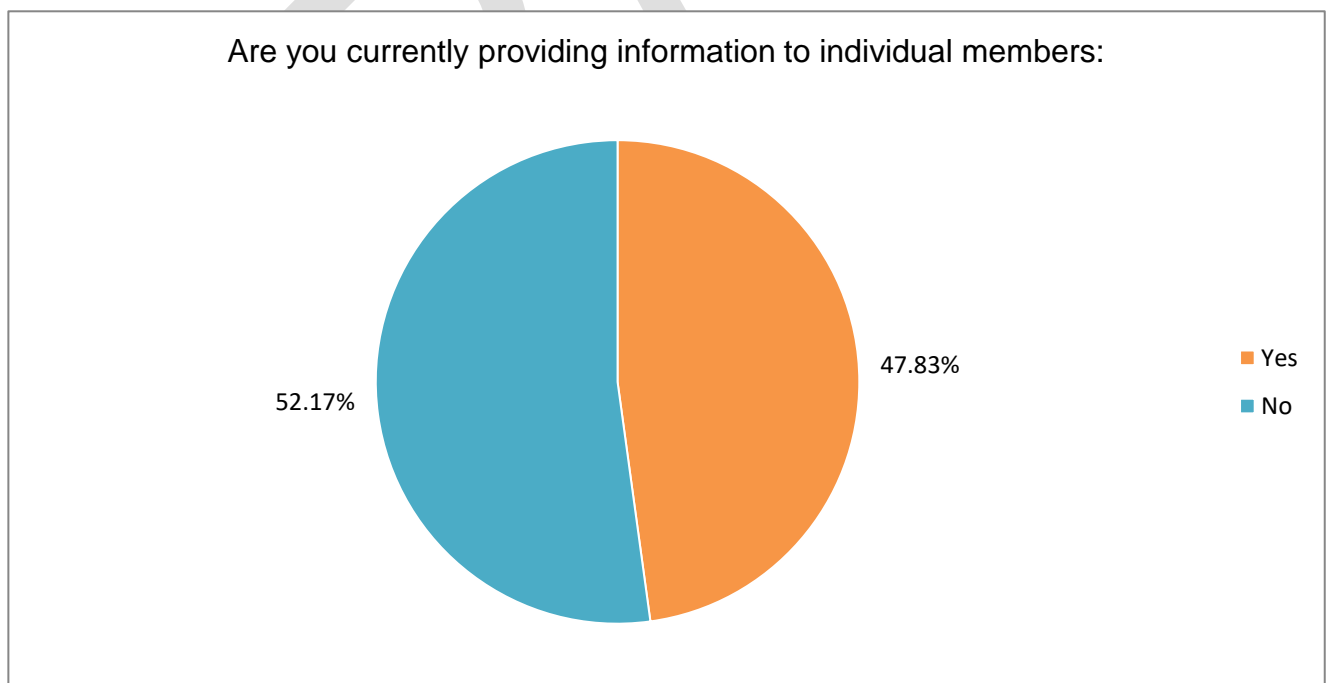
The most popular choices were scenarios for all member cohorts across schemes; an online tool directly linked to scheme membership data (therefore within the pension administration system); and remedy figures for members within a certain number of years of retirement (i.e., estimates of benefits through the pension administration system).

A high-level modeller or online tool which rely on member input were less popular. Under

“other”, one FRA suggested that tax implications should be covered. The SAB will consider these preferences.



The percentage of FRAs providing information to individual members is finely balanced. Where information is being provided, this is primarily concerning immediate detriment or is generic information which has been circulated by the LGA or the government ([Annex H](#)).

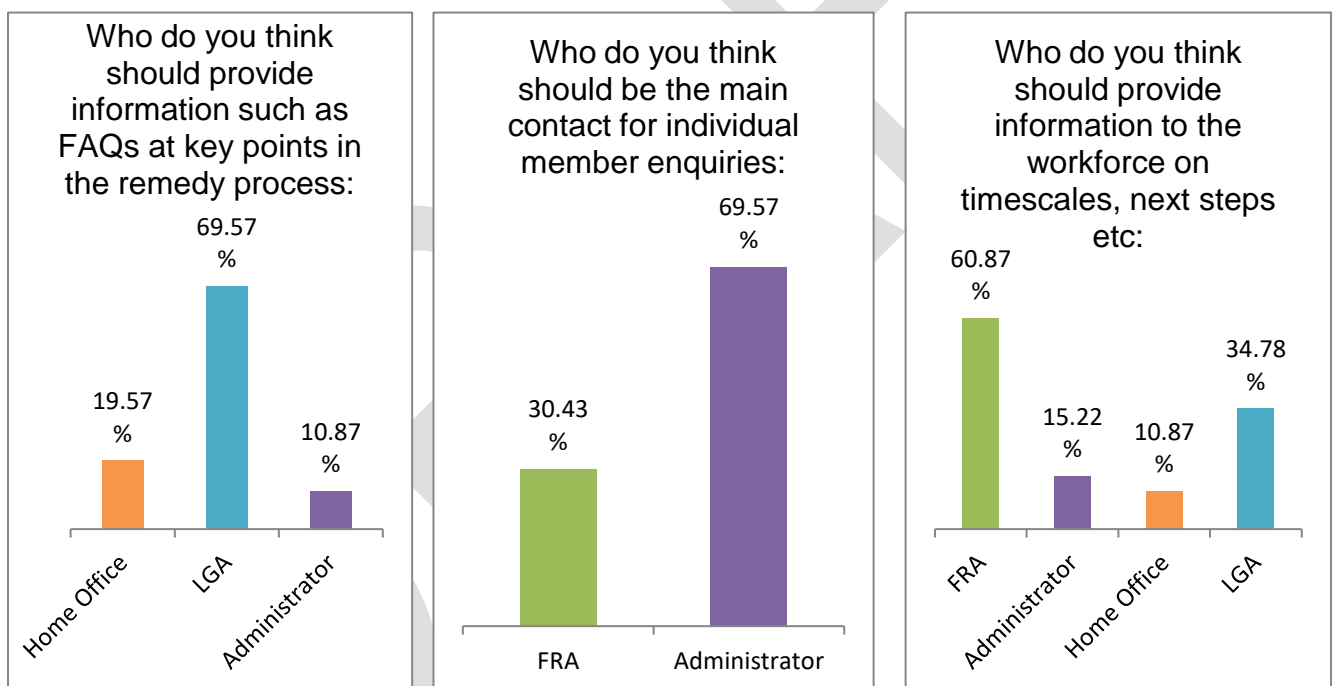


The next three questions asked FRAs for their opinion on who should provide information or deal with queries during the remedy process:

- Seventy per cent thought that the LGA should provide information such as FAQs at key points during the process.
- Seventy per cent thought that the administrator should be the main contact for individual member enquiries.
- Sixty-one per cent thought that the FRA should provide information to the workforce on timescales and next steps, and 35 per cent thought that the LGA should do this.

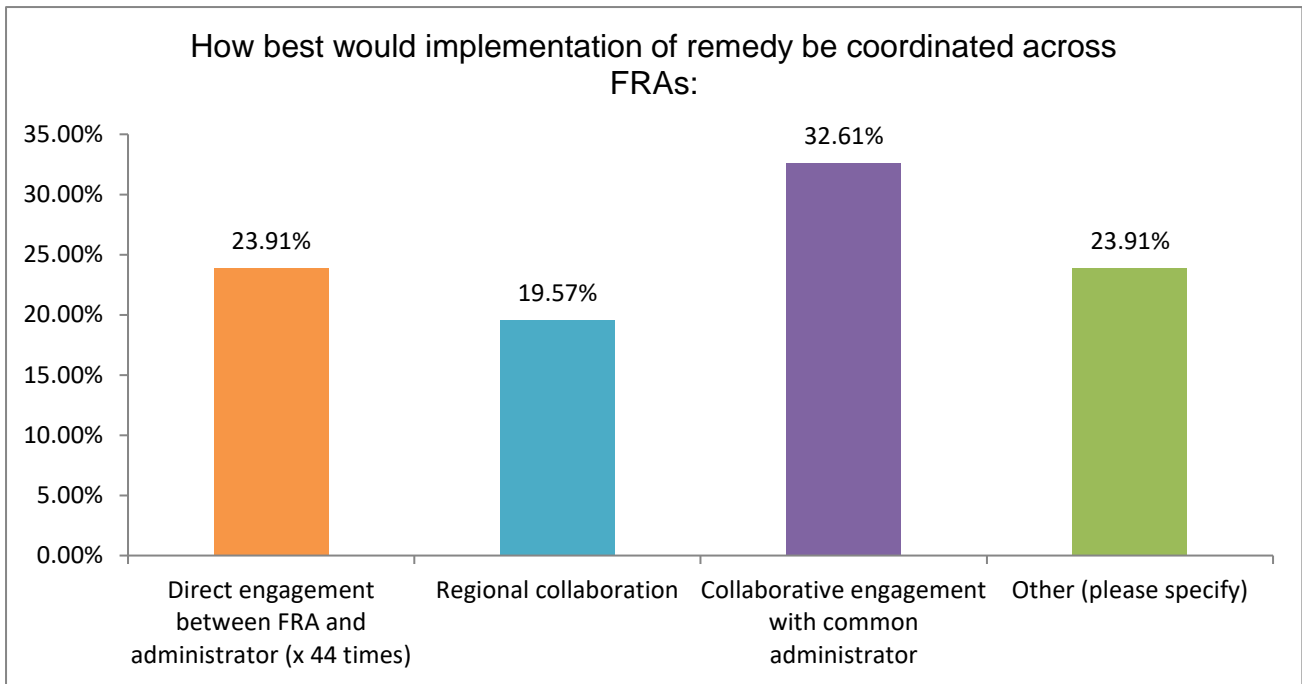
N.B. Percentages add up to more than one hundred, as FRAs could select more than one option.

These outcomes are broadly in line with our expectations and preferences. In terms of providing information to the firefighter workforce, we would anticipate providing this information to FRAs to pass on to their members.



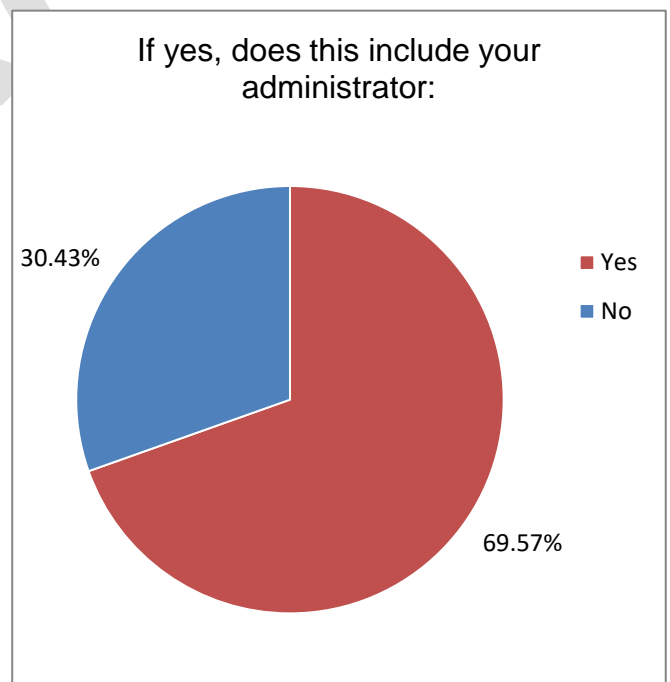
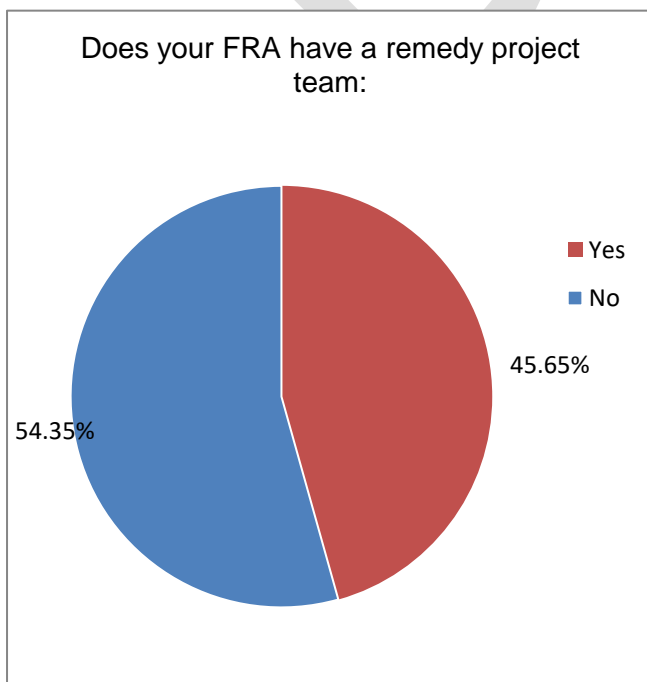
Views on how best remedy would be coordinated across FRAs were mixed. Collaborative engagement with a shared administrator was the slightly preferred option at 33 per cent. However, not all FRAs have a shared administrator and may therefore have selected direct engagement.

Under the “other” response, several FRAs suggested national collaboration or regionally in line with a national framework.



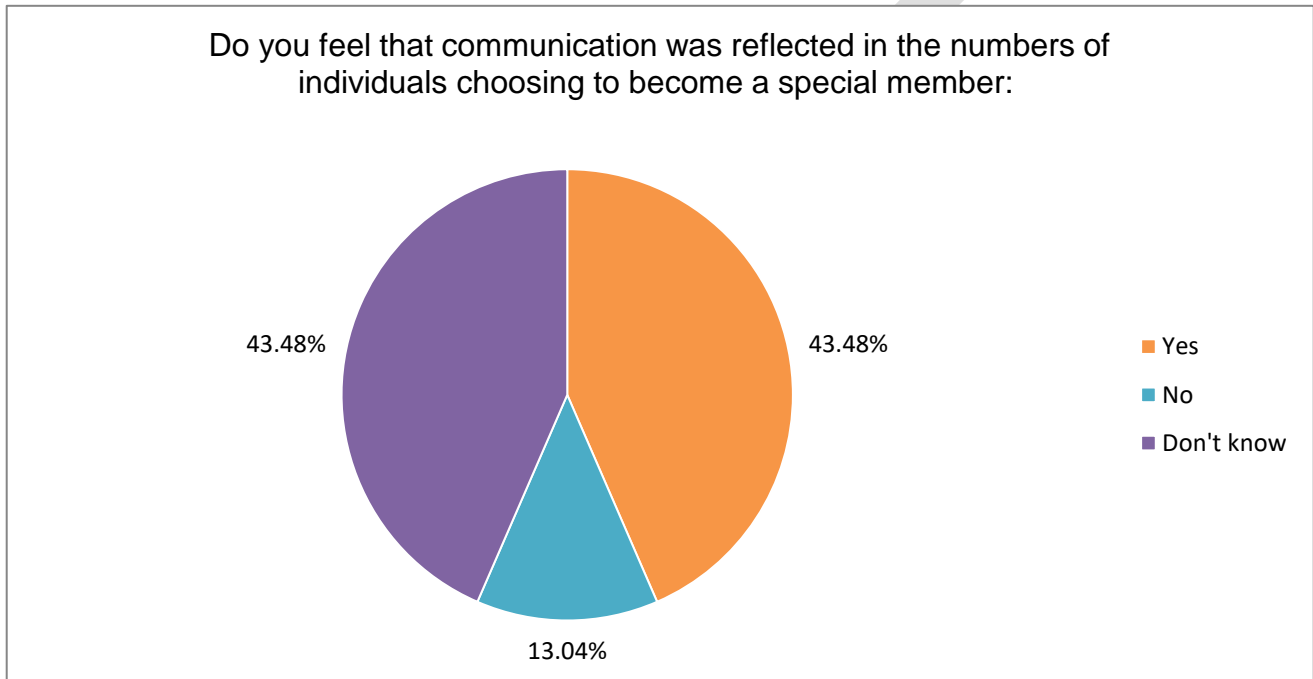
We asked FRAs to confirm whether they have a remedy project team, to facilitate effective implementation, and if so, whether this includes their third-party administrator. Responses to the first question were again fairly balanced, and in a majority of cases the administrator is included.

Comments were invited where the answer to the second question was “no”. Many of these stated that the administrator has a project team, and that the FRA is involved in those groups, rather than the other way around.



Moving on to consider Matthews and the first special members options exercise, FRAs were asked to indicate on a scale of one to ten (with one being the lowest), how well they felt this was communicated in 2014-15. The weighted average response was 5.93.

We were interested to understand whether the level of communication was reflected in the number of individuals choosing to become a special member, as the take up rate was relatively low. The results were inconclusive: 43 per cent agreed, but the same [amount number](#) were unsure; only 13 per cent responded negatively. The question was speculative, and it should also be considered that questionnaires were also submitted in respect of Wales where the deadlines were later.



FRAs were asked to detail any suggestions for improving communications for second options exercise. A wide range of helpful proposals were submitted, and a list of the verbatim responses is available at [Annex I](#). The generated word cloud below illustrates some of the key areas of importance to FRAs.



#### 4.5 Knowledge, capability, and capacity

There is likely to be a requirement for an enhanced level of knowledge and resource capacity in Firefighters’ pensions over the next three to four years. We asked if FRAs to tell us about any plans in place to address this.

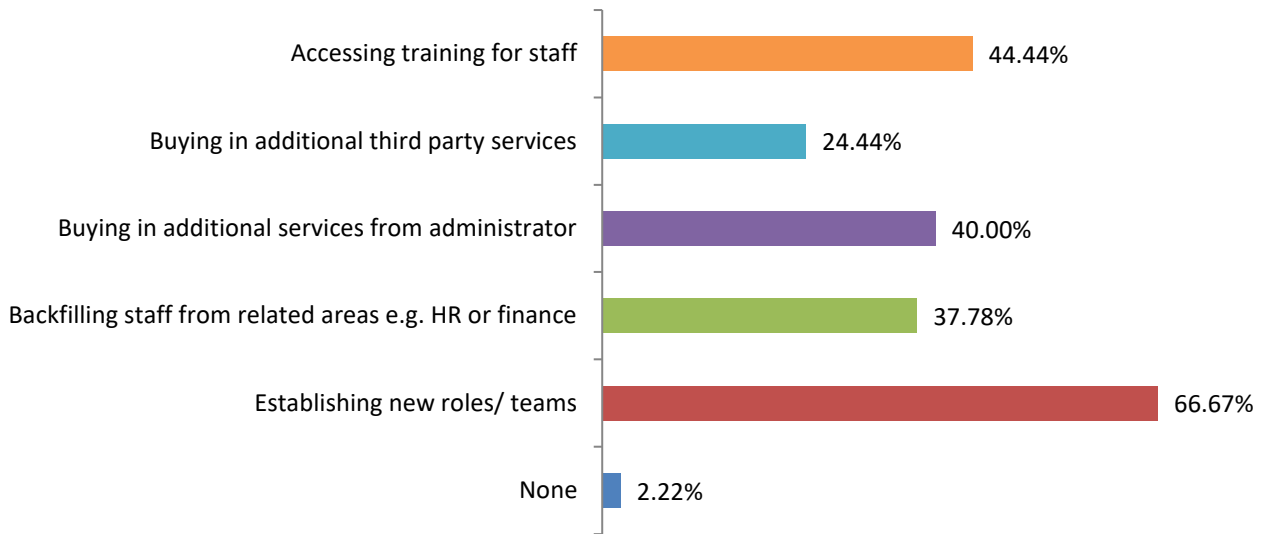
The weighted average level of internal pensions knowledge and capacity within each FRA as indicated on a scale of one to ten (one being the lowest) was 5.67. However, as one respondent commented in the final question, having knowledge does not necessarily mean also having capacity, and these two measures should have been taken separately.

A range of measures were suggested that FRAs might be considering to address any shortfall, with an invitation to tick all that apply. The most popular option was recruiting for additional resource or creating new roles, followed by accessing training for all staff.

For clarity, the only FRA who indicated that they are not considering any additional measures are generally incorporated into another FRA for all pension-related matters.



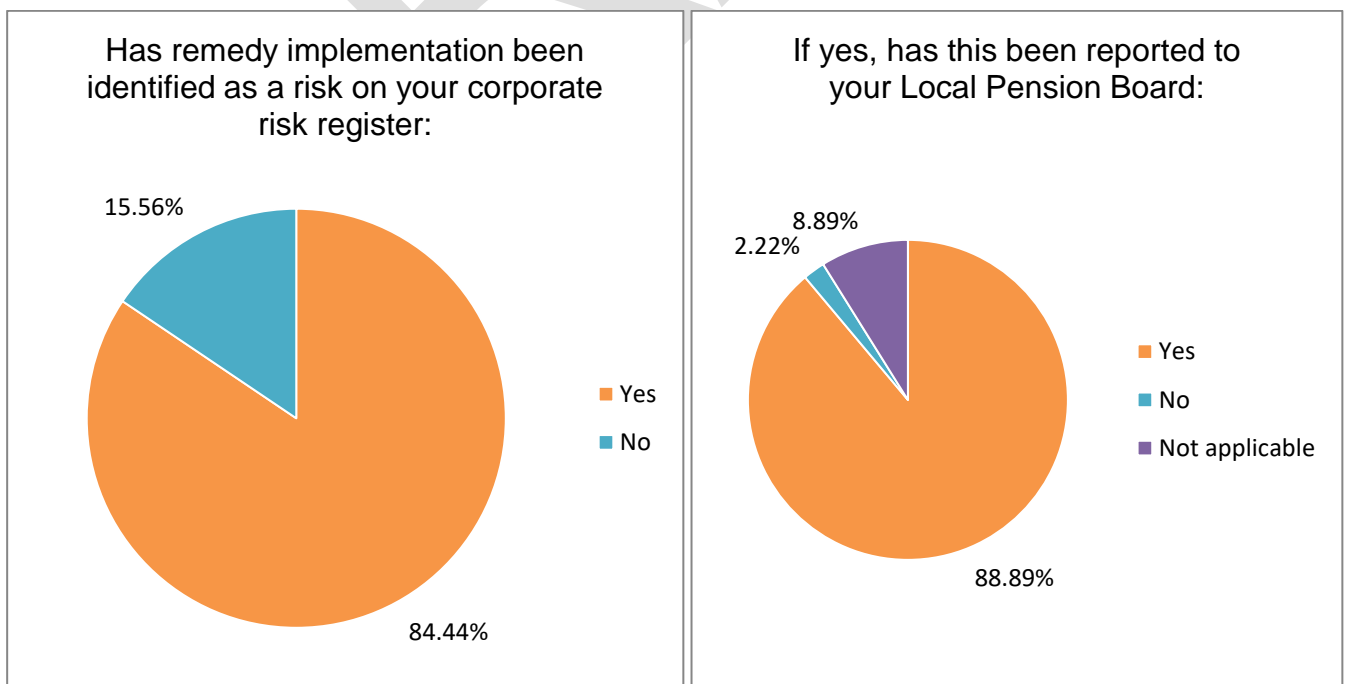
What measures are you considering to address any shortfall in capacity (tick all that apply):



Eighty-four per cent of authorities have identified remedy implementation as a risk on their corporate risk register and in the majority of cases this has been reported to the FRA's Local Pension Board (LPB).

The figures are slightly skewed as three FRAs answered "no" to the first question, but "yes" to the second. This is an equally valid response; however, the follow-up question was designed to be answered where the first response was positive, hence the "not applicable" option. Only one FRA has identified the risk but not reported it to the LPB.

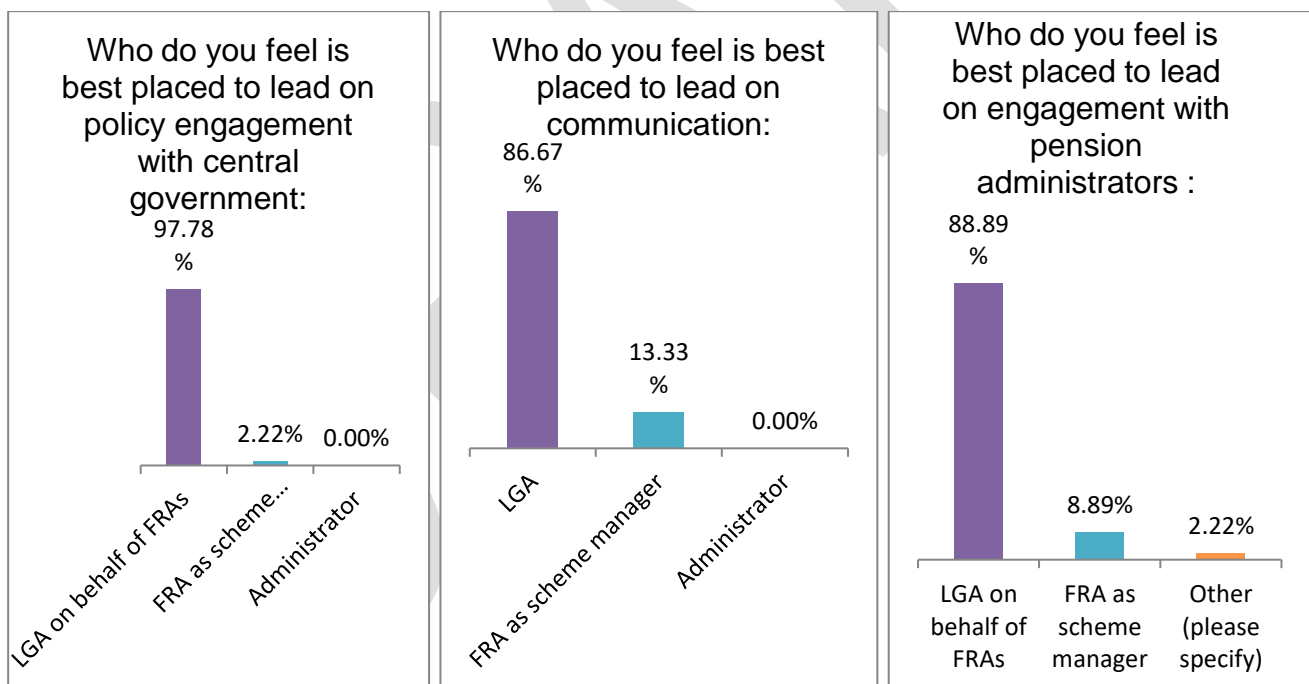
[It would have been useful to ask an additional follow-up question to establish why remedy implementation is not considered a corporate risk, where a negative response was given.](#)



A series of three questions was then posed around which organisation or body would be best placed to lead on certain aspects of remedy:

- Ninety-eight per cent of respondents felt that the LGA are best placed to lead on policy engagement with central government on the legislation needed to bring in age discrimination remedy. One FRA noted the LGA should act in association with the SAB.
- Eighty-seven per cent stated that the LGA is best placed to lead on direct service wide communication or provision of content for communication. Thirteen per cent thought this should be carried out by the FRA as scheme manager. Two additional comments suggested that this could be collaboratively undertaken.
- Eighty-nine per cent felt that the LGA is best placed to lead on engagement with pension administrators on implementation, with 9 per cent selecting the FRA as scheme manager. One authority noted that this should be an iterative process with the LGA informing the scheme manager who would then work with their administrator.

The responses to these questions give the LGA the necessary endorsement to lead on remedy related issues on behalf of FRAs and provide assurance that this is the sector’s preferred approach.



The final question asked FRAs to rate how useful the survey had been to identify gaps in planning for Sargeant and Matthews, on a scale of one to ten (one being the lowest). The weighted average response was 5.98.

This is perhaps lower than anticipated, however, it could be viewed positively in that FRAs feel that they were already well prepared at the time of completing the survey. The survey outcomes will probably prove more useful, as they will provide a benchmark and allow the

LGA and SAB to identify any gaps and how these might be addressed.

Eleven authorities provided additional comments, these are listed below for completeness:

Any final comments:
Undoubtedly resolving both of these issues is going to be challenging in terms of obtaining relevant data and the availability of capacity and knowledge. We would support a centralised / co-ordinated approach that draws on the knowledge and capacity within the LGA and administrators such as West Yorkshire Pension Fund (WYPF).
Progress can only be made when clarity over remedy is known and ideally a cost framework in respect of the additional processing and calculation has been agreed nationally in respect of the pension providers.
some questions do not allow for a split answer between the cases (Q26).
The survey @ Q53 cannot be answered accurately, as we have a reasonably high level of knowledge but very limited capacity to complete the additional work.
Our HR records are held for the lifetime of someone's employment. They are held for 7 years after someone leaves.
Very useful survey, think having these more frequent keeps the main factors and workloads in everyone minds, also to identify areas which you hadn't thought of and no need to look into further.
Confirmed we are aware of, and are planning for the difficulties that lie ahead.
This remains a new piece of work and some of the questions seem to alternate between 2015 and Matthews Case, useful to review our position with the survey. Thanks
Would be interested to know when the analysis of the survey will be shared and how this will inform next steps. Timelines for planning are essential. Communication void needs to be filled although absolutely appreciate the difficulties with this
Funding remains a concern for FRAs. Clarity is needed from Government about where the additional monies will come from i.e. top up grant.
the process is going to be an extremely complex one and the Matthews case is going to a challenge due to the timescales involved, it would be advantageous if as much detail around the process could be developed centrally so that services aren't in the position of having to develop the process in addition to the identification the required information and detail
Our biggest issue is that all the payroll work prior to 01/04/2021 has to be done manually due to the Combined Fire Authority coming into effect. Extracting data from our payroll system and into the format required for the data collection template is going to take some careful thought and planning, Overall, we feel like we are in a good position at this time.

## 5. Recommendations

The SAB would like to thank all FRAs for their participation in the survey, and for continuing to support the work of the Board.

Overall, the survey has painted a positive picture of the sector's preparedness for remedy in Sargeant and Matthews. The weighted average response for usefulness of the survey in identifying gaps was around six. This suggests that FRAs feel, on balance, relatively prepared. [However, the SAB has expressed concern over some individual responses and will seek a fuller understanding of these submissions in due course. FRAs are reminded that the implementation of remedy is a legislative requirement.](#)

-The survey results will allow authorities to benchmark their existing plans and the following section provides recommendations and assurances on actions to address areas of concern.

As the responses to some questions are likely to change as further policy direction and legislation become available, the SAB recommend that an abbreviated version of the survey is carried out at intervals as a temperature check.

## 5.1 Current arrangements

Sixty per cent of FRAs are covered by two administration providers. Since the survey was launched, the number of administrators offering FPS services has reduced from 16 to 15, with another withdrawing from the market from April 2022.

There is no clear appetite for administration to be centralised and this would not solve the complexity of 44 separate decision makers for the schemes. Authorities seem to be happy with the status quo, or to allow natural attrition until there are a small number of multi-FRA administrators.

The recommendation in this case is to improve routes to administration procurement for FRAs by development of a procurement framework, as exists for the Local Government Pension Scheme. This would allow FRAs to avoid long and complicated procurement processes and will allow greater choice of preferred providers.

## 5.2 Data

Good progress has been made on identifying data requirements for age discrimination remedy (Sargeant) and this will be further supported by provision of the software data extract and a planned data workshop for administrators. Further clarity on the second FPS 2006 special members options exercise (Matthews) will allow FRAs to progress data considerations and a good framework is in place from the first exercise.

As collection of pay and service data will be particularly complex for Matthews, a recommendation is made for the FPS technical group to establish a set of principles and best practice for cases where data cannot be obtained.

FRAs rightly identified that different processes will need to be put in place for different member cohorts for contribution corrections and the associated tax relief and interest adjustments, and it is evident that clear guidance will be needed. The LGA recommends close monitoring of policy information from central government and provision of accompanying guidance developed by the FPS technical group.

## 5.3 Processes and impact

Further clarity is required on the policy intent for pensions tax adjustments. As these will primarily be undertaken by scheme administrators, further engagement with administrators will be arranged once the Finance Bill is enacted in April 2022 and requirements are clearer. This should include software suppliers to determine the level of automation that will be possible.

The amendment to legislation to extend the deadlines for Mandatory Scheme Pays is welcomed.

Less than a quarter of FRAs have an allocated budget for direct and indirect remedy costs. The LGA will ensure that robust representations are made to the government for adequate funding to alleviate the financial burden of Sargeant and Matthews. The LGA will work closely with the chair of the Fire Finance Network to monitor remedy costs, particularly in relation to software and administration.

While FRAs broadly seem to have appropriate legal support in place, we know from experience that without prejudice information provided to nominated legal contacts is not always communicated to relevant colleagues within the organisation to allow timely decision making. The LGA Bluelight team will liaise internally with Workforce colleagues to determine whether any improvements can be put in place.

It is encouraging to note that the potential impact of Sargeant is being modelled into workforce planning. A recommendation arising from this is to ensure that individual members receive timely and comprehensive information on remedy ~~in order~~ for them to make informed choices as to when they wish to retire; for example, a common misconception is that protected members will lose their final salary entitlements if they continue in service past 1 April 2022. Information on remedy will also be added to [www.fpsmember.org](http://www.fpsmember.org) by the end of October 2021. The Fire Communications Working Group (FCWG) will lead on this work.

DRAFT

## 5.4 Information, communication, and coordination

Following the indication of preferences for remedy tools, a recommendation is made to start immediate procurement for scenarios for all member cohorts across schemes. The SAB will seek to encourage software suppliers to improve the online member self-service offer and encourage administrators to make this available to FRAs. To avoid duplication of time and monetary resource, it is recommended that a high-level modeller or other online tool independent of membership data is not pursued.

Coordination of remedy should be a collaborative approach between the FRA and their administrator, with national oversight by the LGA. Multi-FRA administrators commonly have client group meetings which can be used for this purpose; centrally the LGA will use the FPS technical group and FCWG to feed into the existing regional fire pension office groups. Each party has a distinct role to play, and each is dependent on the other. Close working relationships will be key, and the SAB recommends that all FRAs and administrators have a remedy project team with a named lead, to ensure effective implementation of both Sargeant and Matthews.

FRAs made a large number of helpful suggestions to improve communications for the second options exercise in Matthews and these will be considered in detail by the FCWG.

## 5.5 Knowledge, capacity, and capability

On average, FRAs rated internal pension knowledge and capacity at 5.67. Common measures to address shortfall were additional recruitment and accessing training. The LGA has committed in the age discrimination remedy Project Implement Document to consider training needs and how these can best be met. This will be taken forward as an action from the survey. Implementing remedy will provide an excellent opportunity for upskilling and developing knowledge, as well as promoting engagement with pensions.

Risk appears to have been reflected [at](#) an appropriate level and governance training will be provided to LPBs allow them to successfully scrutinise and monitor local delivery of remedy.

The sector has provided the necessary assurance on preferred approach for the LGA to lead on policy engagement, communications, and engagement with administrators. The LGA and SAB thank FRAs for their endorsement and continued support.

## Annex A: FRAs in England and Wales

Avon Fire and Rescue Service  
Bedfordshire & Luton Fire and Rescue Service  
Buckinghamshire & Milton Keynes Fire & Rescue Service  
Cambridgeshire Fire and Rescue Service  
Cheshire Fire and Rescue Service  
Cleveland Fire Brigade  
Cornwall Fire and Rescue Service  
Cumbria Fire and Rescue Service  
Derbyshire Fire and Rescue Service  
Devon & Somerset Fire and Rescue Service  
Dorset & Wiltshire Fire and Rescue Service  
Durham & Darlington Fire & Rescue Service  
East Sussex Fire and Rescue Service  
Essex County Fire and Rescue Service  
Gloucestershire Fire and Rescue Service  
Greater Manchester Fire and Rescue Service  
Hampshire & IOW Fire and Rescue Service  
Hereford & Worcester Fire and Rescue Service  
Hertfordshire Fire and Rescue Service  
Humberside Fire Brigade  
Isle of Scilly Fire Brigade  
Kent Fire Brigade  
Lancashire Fire and Rescue Service  
Leicestershire Fire and Rescue Service  
Lincolnshire Fire and Rescue Service  
London Fire Brigade  
Merseyside Fire and Rescue Service  
Mid and West Wales Fire and Rescue Service  
Norfolk Fire and Rescue Service  
Northamptonshire Fire and Rescue Service  
Northumberland Fire and Rescue Service  
North Wales Fire and Rescue Service  
North Yorkshire Fire and Rescue Service  
Nottinghamshire Fire and Rescue Service  
Oxfordshire Fire and Rescue Service  
Royal Berkshire Fire and Rescue Service  
Shropshire Fire and Rescue Service  
South Wales Fire and Rescue Service  
South Yorkshire Fire and Rescue Service  
Staffordshire Fire and Rescue Service  
Suffolk Fire and Rescue Service  
Surrey Fire and Rescue Service  
Tyne & Wear Fire and Rescue Service  
Warwickshire Fire and Rescue Service  
West Midlands Fire Service  
West Sussex Fire and Rescue Service  
West Yorkshire Fire and Rescue Service

## Annex B: What position within your FRA oversees delivery of pension administration:

Accountant People Services  
Assistant Chief Fire Officer  
Assistant Chief Fire Officer Corporate Services  
Assistant Director of Finance  
Assistant Director, HR & Learning  
Chief Executive of the Fire and Rescue Service  
Chief Finance Officer  
Chief Fire Officer  
DCFO as Scheme Manager although day to day is carried out by Director of Finance & Procurement  
Deputy Chief Fire Officer  
Deputy Chief Fire Officer  
Deputy Section 151 Officer  
Director of Corporate Services  
Director of Finance and Assets  
Director of Finance, Assets & Resources  
Director of People and Development  
finance  
Finance Manager  
Finance Officer  
Head of Data, Digital and Specialist Projects  
Head of Finance  
Head of Finance - Pensions, Treasury & VAT  
Head of HR  
Head of HR and Learning and Development and Head of Finance and Procurement

Head of HR/ Head of Finance  
Head of Human Resources  
Head of People Services - Joint Police/Fire team  
Head of Resource Management, Payroll & Pension Groups  
HR Rewards & Benefits Manager  
HR Services Manager in County Council  
No official post, jointly via Finance & Compliance Manager and Scheme Manager, HR  
Payroll & Pensions Manager  
Payroll & Pensions Manager  
Payroll and Pension Manager  
Payrolls and Pensions Manager  
Pension Fund Committee  
Pension Manager  
Pension Officer  
Pensions / Payroll & HR Intelligence Manager  
Pensions Manager  
Pensions Manager  
Pensions Officer  
Pensions Remedy Advisor (new post currently vacant)  
Principal Pensions Consultant  
Procurement Manager with lead responsibility for pension administration  
Scheme Manager  
Senior Manager - People Management



## Annex C: Who line manages that post-holder:

Area Manager Business Support	Deputy Chief Fire Officer
Assistant Chief Fire Officer	Deputy Chief Fire Officer
Assistant Chief Officer	Director of Corporate Services
Assistant Director - Finance	Director of People Services
Assistant Director - People Services	Director, Finance and Corporate Services
Assistant Director - Workforce	Financial Services Manager
Assistant Director - Workforce Operations	Financial Services Manager
CFO line manages the Finance & Compliance Manager	Fire Authority (via normal Director /CFO structure)
CFO/CE	Head of Employment Policy and Practise
Chief Executive	Head of Finance
Chief Executive (Head of Paid Service)	Head of Financial Services
Chief Fire Officer	Head of HR
Chief Fire Officer	Head of HR in County Council
Chief Fire Officer	Head of HR/ACO People Services
Chief Fire Officer	Head of Human Resources
Chief Fire Officer	LGPS Pension Fund Investment Manager but I reports into
Chief Fire Officer	Chief Fire Officer for Fire
Chief Fire Officer	N/A
Chief Fire Officer	NA
Chief Fire Officer	Payroll and Pensions Manager
Chief Fire Officer as Scheme Manager	Section 151 Officer
chief officer	Senior Head of People/ Assistant Chief Fire Officer
Corporate HR Manager	Strategic Enabler for Finance and Resources
County Council member	Treasurer

## Annex D: What position within your FRA will lead on remedy data for both cases:

Accountant (People Services)  
ACFO  
Area Manager Business Support  
Assistant Chief Fire Officer  
Chief Finance Officer  
Deputy Chief Fire Officer  
Deputy S151 Officer for Sargeant, it is unclear at this stage who will lead for Matthews  
Director of Corporate Services with support from Pensions Advisor and HR Manager  
Director of Finance & Procurement  
Finance Officer  
Head of Finance  
Head of HR  
Head of HR  
Head of HR  
Head of People Services  
Head of Resource Management, Payroll & Pension Groups  
HR Business Partner  
HR Business Partner  
HR Manager, Strategy & Reward  
HR Rewards & Benefits Manager  
HR team via Head of HR and Learning and Development  
Human Resources  
Human Resources Business Partner  
In process of recruiting pensions officer  
Lead not yet identified  
None as the administration and remedies will be with XPS  
Payroll & Pensions Manager

Payroll & Pensions Manager  
Payroll and Pensions Manager  
Payroll and Pensions Manager  
Payroll Manager  
Pension Manager  
Pension Officer  
Pension Remedy Manager  
Pensions / Payroll & HR Intelligence Manager  
Pensions Admin Delivery Lead  
Pensions Manager  
Pensions Manager  
Pensions Officer  
Pensions Officer (once position recruited to)  
Pensions Remedy Advisor (currently vacant)  
Pensions Services and Fire and Rescue Management Team  
Principal Pensions Consultant  
Procurement Manager with Lead responsibilities for Pensions  
Scheme Manager -delegated to officers  
Senior Advisor - Pensions

## Annex E: Please detail any problems you can foresee obtaining pay data for the following: Sargeant

Changed payroll area for PAYE. Members effectively have a record from 2007 to 2015 and then new records from 2017 onwards. complexity and volume of data analysis required.

Coordinating data from numerous sources and systems

Creating alternative Schedules of Contributions - CARE vs FS.

Data held on current and legacy payroll systems

Data should be available

Data will need to be extracted from a combination of HR and payroll systems although complex will be achievable

Few issues anticipated

Had new pay system in 2015 which resulted in pay errors until 2018. These were corrected outside of the system identifying temp promotions and differences in pensionable pay between schemes

N/A - All data accessible via Kirklees SAP

No issues

No issues all pay data held on record

No issues foreseen

No problems

no problems foreseen

none but it will be time consuming

none other than time to resource

Payroll data in different systems. Difficult to extract.

Payroll System has been archived. Extremely time consuming to recreate data per member

Prior to 1996 information could be problematic as prior to this this was held with Cleveland County Council who are no longer in existence

Some data in legacy system

Time, accuracy of pulling information from various sources together, rely on payroll provider for assistance may create time pressures

We are implementing new payroll system, so unclear yet as to how to access this data

We believe we can retrieve the data needed back to 2015

We do not envisage problems  
We have some records from 2000 onwards which may be incomplete  
We hold the data in payroll, so there should be minimal impact other than resource  
Working Group Established to secure data

DRAFT

## Annex E continued: Please detail any problems you can foresee obtaining pay data for the following: Matthews

Accessing data from legacy systems, old servers

Accessing records back to 1970 not feasible. May be difficulties in identifying and verifying all eligible members.

as above plus pay information for on-call maybe more difficult to analyse, retention schedule may mean employment records more difficult to work through, locating leavers and communications with members/leavers

Breakdown of pay and who is in scope, few historical records

Challenging and complex - not all records held

data and records not available prior 1/4/2013

Data held on current and legacy payroll systems. Additionally we do not hold salary information prior to 2000

Data may only be available on hard copy files, which may be incomplete

Depending on the scope we would have major issues with the data pre-2011

do not have pay data going back that far

Extract will be more complex due to payroll and HR System changes, full information may not be available

Insufficient historical data

lack of pay records prior to 1995

Lack of payroll data pre-2015

Likely to be some retrieval issues as data only easily available as of 1995

Limited information held digitally prior to 2002

No info prior to the year 2000

Only complete data going back 10 years although incomplete going back to 2007/08

Only current employee records go back to 2006, leavers only to 2015

Only have pay data back to 1999

Our data does not go back far enough, so will be reliant upon guidance as to how to proceed

pay and employment records not being available

Pay data held only goes back to 2005

Pay data may not be available prior to 2000

Pay data would need to be obtained from ledger records

Potentially not being able to obtain legacy data prior to 1999 to support calculations based on actual pay.

Pre 1997 no records held

pre2004 may not be available or very resource intensive to gather as held on microfiche  
Prior to 1996 information could be problematic as prior to this this was held with Cleveland County Council who are no longer in existence  
Records do not exist, or are patchy, going that far back  
Records held by BFRS do not go back far enough. We will be reliant on data held by our pension administrators. Change to payroll provider/pensions administrator over the reference period may highlight gaps in data or accuracy of records  
Some records from 1999 some records incomplete, both due to rules governing historical data and are being removed/destroyed (now on hold)  
Suspect Payroll data will not be available  
Timeframe dependent  
Unsure if data will be available due to extended time period.  
We are implementing new payroll system, so unclear yet as to how to access this data  
We do not have sufficient pay data or employment history for staff who transferred to DSFRS as part of combination with Somerset  
We have microfiche records for payroll in the 1990's may struggle with pre 1990 data will be difficult as no data  
Yes - payroll and employment data  
Yes as actual pay data prior to 2000 is not available

## Annex F: Please detail any issues you think might occur with adjustments of contributions:

18-20 contribution holiday entitlements.

Adjustments for CPD in the 2015 as not pensionable.

Affordability for individual, creation of repayment plans adding to administrative burden over time, getting monies from individuals, pressure to make payments quickly, disputes, tax issues

APB temp promotions

Beneficiaries who have died impact re widows

Calculation of Pay that could now be pensionable

change is payroll system within period means that EYU cannot be completed online and correspondence with HMRC becomes more time consuming.

Changes to members personal circumstances eg divorce, widowed etc complexity

Complexity and accuracy of contributions. Taxation queries from leavers and unauthorised payment queries. Annual allowance queries.

Consideration for temporary promotions in the 2015 scheme which are not currently pensionable.

Converting membership

data collection

Delays in settling cases.

Differences between 1992, 2006/2006 Modified and 2015 FPS mean data gathering is complex and prone to error

Different allowances are pensionable in CARE scheme and not in final salary so will need to be manually calculated

Different percentage rates for different years.

Due to volumes and our payroll system being quite manual there may be a risk of incorrect calculations being made due to the amount of manual intervention that may need to be applied. Although, we do need to know about the detail regarding the calculations before seeing how much of a risk this will be

Ensuring calculations are correct, communication with members, members unhappy with having to make additional contributions and ensuring that interest is applied correctly if applicable.

Hardship cases - guidance needed on how to apply a consistent approach.

Having the capacity to apply and calculate, dealing with under/over payments, reconciling correct for pension returns, timeline of repayments and potential debtors for financial accounts.

Identifying breakdown of contributions made. Assumptions still required regarding interest rates that need to be applied.

If members not satisfied by IDRPs determinations, TPR and TPO may become involved, again leading to FRA resources being overwhelmed

If Remedy includes a calculator from GAD, which is complex, there's a risk of misinterpreting what's required, keying errors

If taken through Payroll the member will only get the tax relief on the code in operation at the time. Need guidance on how to manage adjustment for the entire remedy period. This is very complex and FRAs will need focussed support and guidance from HMRC. Cannot be left to FRA to sort out.

Incomplete Payroll/HR records – Scheme Manager is unaware of the nature of any issues until the detailed work is under way

Issues around the correct tax treatment. Refunds not paying tax outside 4 years. System will automatically seek to recover tax lack of working model eg a calculator showing amount which should have been paid which would allow the working out of the difference to what has actually been paid

Legal challenges and disputes from Rep Bodies.

Manual calculations required - prone to errors

Members likely to query data, IDRPs process may be used by many members (rather than less than one per annum on average, as currently) leading to FRA resources being overwhelmed

Members will be required to opt for legacy benefits, with the default being to stay in the 2015 Scheme for non-responders: how will the FRA evidence that it has made reasonable efforts to contact a member?

need further information on the collection methods, Collection via PAYE for existing employees shouldn't be an issue but from those employees that have left will be more complex especially with regard to the taxation issues, as per the special members exercise previously undertaken

No contribution overpayments for 2016 Claimants

No issues if guidance is adequate

Other than resource, if there is clear guidance on how this should take place then I don't see any issues.

Payroll systems changes and Payroll/HR/FRS personnel changes over the last 7 years leading to judgments being required to gather the data

Reliance on a small number of key staff (within FRA and Administrator), with significant key man risk

Resources

Resourcing issue – need more discussions with Pensions administrator to see how this will work.

risk of error

Some active members may not be able to pay backdated contributions through payroll which means they may have to wait for the government process to be put in place to claim compensation for tax relief.

Split pension issue

Support will be required to calculate historical cases.



tax implications

tax issues for non-active members, claiming back tax or being taxed for receiving unauthorised payments for contribution holidays.

Tax relief for past years, sufficient pay if we choose to deduct from final pay, annual allowance are we going to recalculate year on year, Schemes pays and timing of this

Tax relief for retired members, payment of contributions in advance of legacy pension payments?

Tax relief, contributions holidays, CETVs, scheme pays, annual allowances, added years contributions.

Tax relief, refunds or additional payments. Payment holiday.

The Combined FRA came into effect 01/04/2021, any adjustment / calculation needed prior to this for contributions will have to be done manually

This will be dependant on guidance and tools provided from LGA

Time consuming for small teams making calculation times lengthy.

Time consuming to gather the payroll data, communicate with members, trace members where necessary, agree repayment terms, chase and track payments, liaise with administrator to ensure a member's pension is increased only after contributions due from him/her have been recovered

unknown until we know more about it

Unsure yet until receive further guidance

updating systems

wait to be advised as many issues known!

What could be a significant cost of administering implementation of Sargeant Remedy will be borne by the FRA

Whole process, from data gathering to collecting all contributions due will span years, rather than months, and any delays will have knock-on effects

will need to have separate process for leavers and will need further guidance from government before agreeing final processes

With regard to Question 26 we do not envisage being able to accurately obtain/backdate contribution data for Matthews

## Annex G: Who leads on workforce planning and retention for your FRA:

Accountant (People Services)  
ACFO  
ACFO Service Delivery Support  
ACO Organisation Development  
Area Manager People & Organisational Development  
Assistant Chief Executive, People, Values and Culture  
Assistant Chief Fire Officer  
Assistant Chief Fire Officer Strategy, Planning and Resources  
Assistant Director - People Services  
Chief Employment Service Officer  
Corporate Management Team through an bi-monthly meeting  
DCFO  
Dedicated Group Manager & HR Business Partner  
Deputy Chief Fire Officer  
Director of People and Development  
Fire & Rescue Service  
Fire HR Business Partner  
Head of HR  
Head of HR  
Head of Organisational Development & Transformation  
Head of People and Organisational Development  
Head of People and Organisational Development (HR)  
Head of Resource Management, Payroll and Pension Groups

HR  
HR and Employment Team  
HR and Resourcing and Development (through Head of HR and Learning and Development)  
HR Business Partner  
HR Workforce Planning Manager  
Human Resources  
Human Resources  
Human Resources  
Human Resources  
Human Resources  
Human Resources/ Organisational Development  
People Management  
People Organisational Development (HR)  
People Services Department  
Resourcing Manager (HR Department)  
Shared Services HR  
Strategic Enabler People  
Strategic People and OD Lead  
Talent & Resourcing Manager  
Workforce Improvement Manager

## Annex H: Are you currently providing information to individual members (detailed responses):

Communicating information provided by LGA or Welsh Government.

Communication sheets as required

Estimates up to 31 March 2022. Let's talk event held with employees.

For immediate detriment only

for members who meet the criteria for immediate detriment, benefits based on both options Legacy and mixed benefit.

For those under Immediate Detriment, at the point the retirement paperwork is sent, figures for remedy are included

General Queries; members seeking to retire early (rule of 75) by 31.03.2022 to avoid going into CARE. Explaining 1992 benefits will not be lost/frozen until 60.

However the information provided is general data and not specific to the individual.

ID cases only - in the order of retirement and on an individual basis as required

Immediate Detriment figures provided at the point of retirement. No estimates prior to that. Otherwise just general comms

Information has been provided to those who have requested and thinking of imminent retirement, but is heavily caveated as based on information available at the time and may be subject to change

LGA bulletins and regular staff updates (internal Comms)

Member briefings in place

Signposting.

To Immediate Detriment cases approaching retirement

We are communicating in line with LGA guidance and, having taken the decision to proceed with immediate detriment cases, around ID.

We are providing factsheets etc supplied from LGA but not individual quotes based on remedy or ID, we are adhering to current scheme rules at this point in time.

We have circulated LGA website and administrator website information. Are providing valuations for those due to retire as implementing immediate detriment.

Yes; we have just started to look to pay our first cases under Immediate Detriment.

## Annex I: Please detail any suggestions for improvement for communicating the second options exercise:

Better GAD calculator, consistent info from central resource.

Briefings throughout the county as only held employee briefings in one place to date.

Cannot answer these questions as nobody who dealt with the 2014/15 exercise is still in Service.

Clear and concise information that can be understood by all

Clear information about interest payable v paying off debt via lump sum

Clear information about tax implications of decisions to be made by members

Clear option packs with flowcharts and clarity for individuals on risk and actions required, ensure the tools used are tested and correct to limit workloads and prospect of difference versions being issued. Road test with rep bodies and administrators, clear steps for FRAs

Clear, timely and consistent guidance needed from the outset.

Ensure a suite of guidance documents/ resources is produced centrally for FRA's to use so that all individuals get the same information. Ensure the information can be clearly understood by interested parties.

Ensuring the communication is clear and a consistent message is being provided across all FRA's

FRAs to have the right people involved at the beginning - form a proper project group.

Have national consistent comms to issue. Scenario examples. Factsheets. Use the new Member website.

Improved information regarding impact and value for money

More appropriate time scales

more detail for FRAs on their responsibilities and actions required, it is better for FRAs to communicate with members and have control over this process by cascading standardised communications from LGA

More use of Social Media and possibly radio adverts to the community as a lot of contact details will be out of date

National advertising campaign

National Awareness Campaign. Simplification of message with worked examples. Confidence in that this is not a pensions scam.

Need more information at inception so that a considered approach to information flow can be taken from the outset, the previous exercise didn't have the systems and support in place that we now have and hopefully the full guidance will be available with all the associated documentation rather than services being left to find their way through what was needing to be done.

Online tool/ calculator for members to use

People are more aware of the impact now, better liaison between LGA, Pension Administrators, FRA and the Rep Bodies. Rep Bodies hold a slightly different view of potential outcomes which is causing conflict.

Presentations that FRAs can use when going out to stations or can view online

problem identifying the cohort with current addresses

Request FPS members to contact former colleagues and get in touch if they held a retained post in addition to main post

Request unions to circulate its membership

Second option should be limited to service pre 2000. Before undertaking a second exercise clarity is required on how the contribution entitlement will be assessed at the payroll data will not be available.

set guidelines for what is considered as best endeavours

Several requests via the weekly Routine Notice

simpler messaging, more templates and joint working

Standard set of documents across all FRAs to ensure consistent messaging.

Station presentations

streamline the process for potential take-ups, provide clear FAQ's, with easy to follow process maps, reduce jargon and provide as much support to FRA's to deliver it with success

template letters setting out options and disclaimers

Template letters written in a clear & understandable way, with FAQ's. Employers should have the opportunity to feed back on draft versions before they're finalised.

The last option exercise was centrally coordinated - so all FRA's had the option to use the same forms of communications for options/quotes etc

Timely and accurate comms

Understanding of interest if paying back over a fixed period

Value for money not communicated very well

Videos for members to access at anytime of day

Would like the LGA to provide words to ensure consistency of approach

Would need National standardised literature to send out.