

Monthly Report

November 2022

Derbyshire Fire Authority



West Yorkshire Pension Fund

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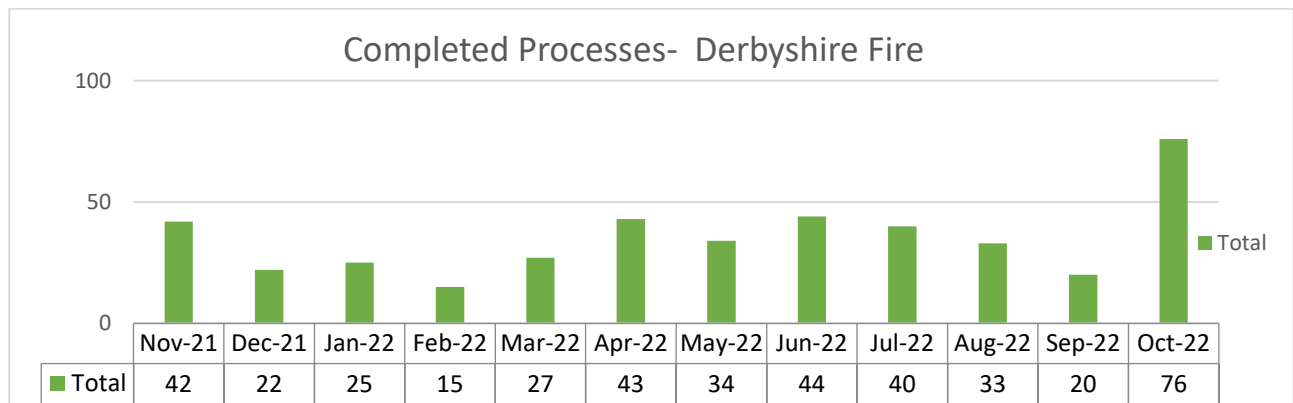


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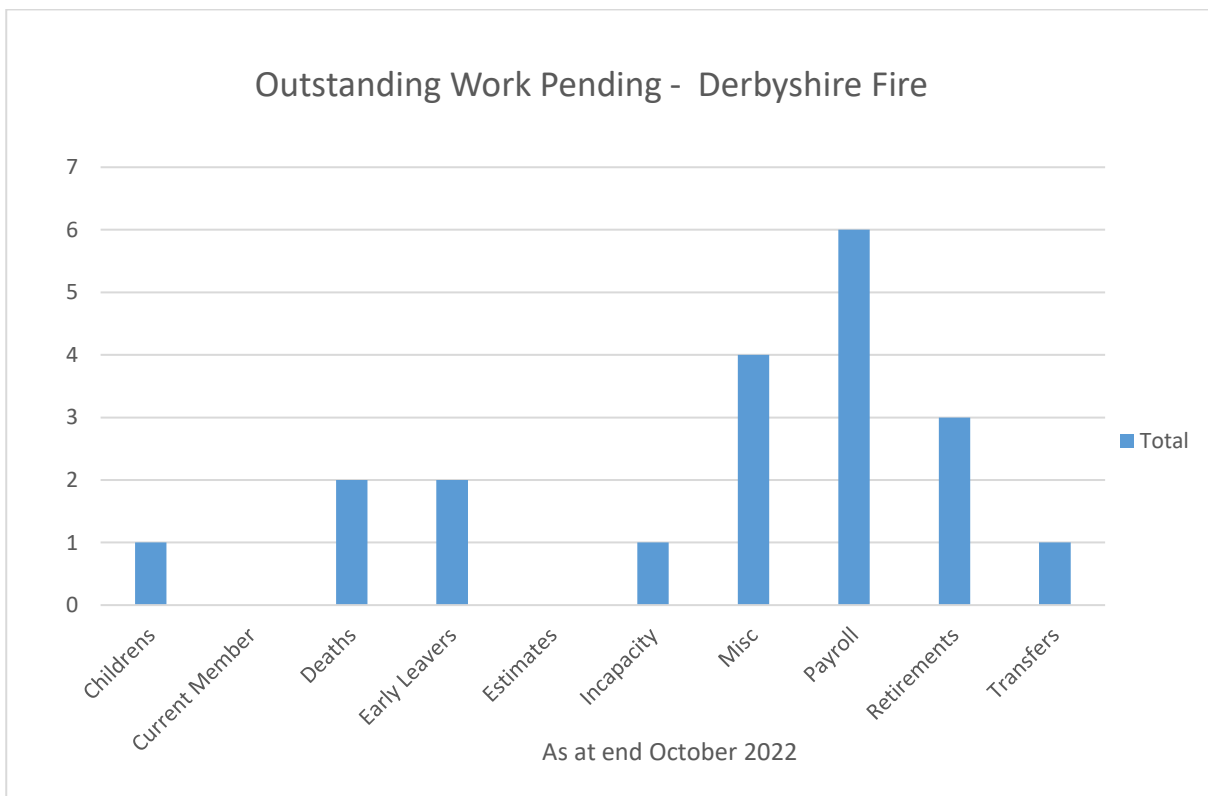
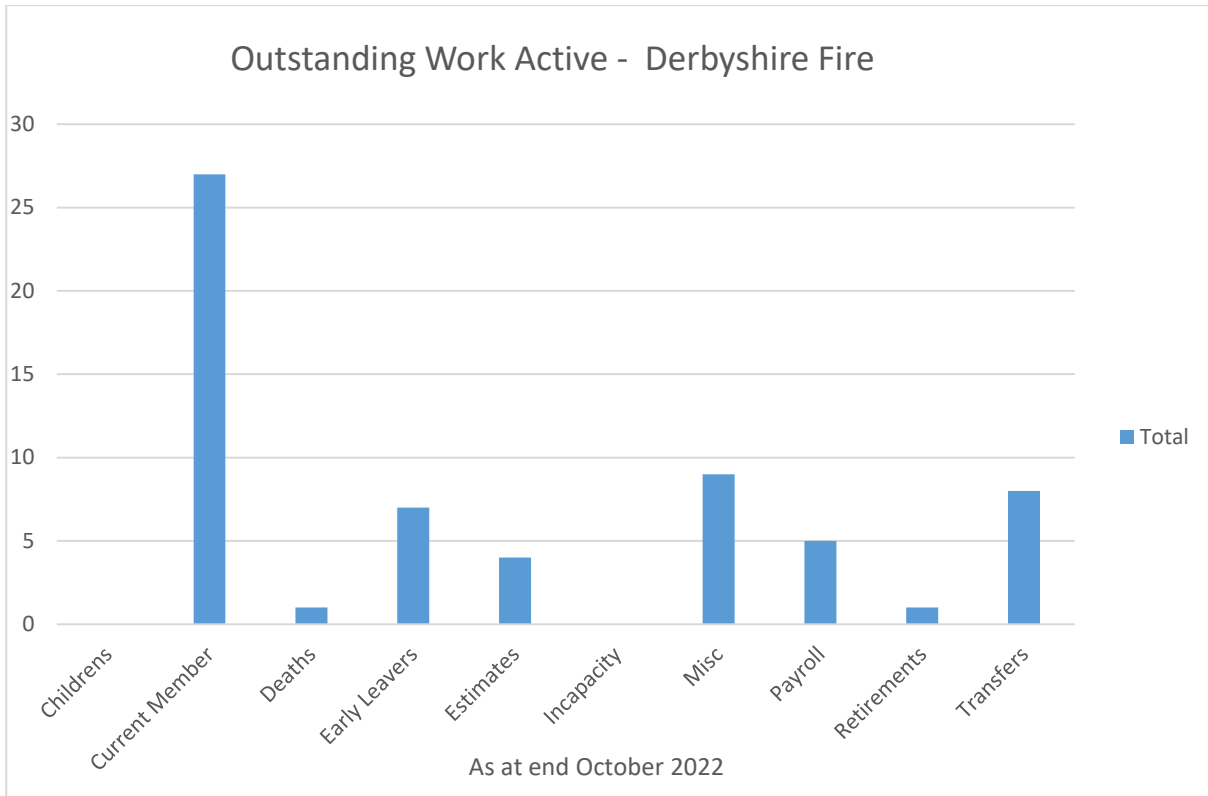
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1. Completed processes

1 to 31 October 2022						
Work Type	Total Cases	Target days for each case	Target met cases	Minimum Target Met	Target met percent	Average time taken
Deferred Benefits Set Up on Leaving	7	20	3	85	42.86	68
Pension Estimate	7	10	3	90	42.86	10.29
Pension Set Up/Payment of Lump Sum	1	3	1	85	100	3
Retirement Actual	1	10	1	90	100	6
Set Up New Spouse Pension SY Fire	1	5	1	85	100	1
Age 55 Increase to Pension	1	20	1	85	100	15
NI adjustment to Pension at State Pension Age	2	20	2	85	100	20
Death in Retirement	1	10	1	85	100	1
Update Member Details	54	20	53	100	98.15	2.83
Initial letter Death in Retirement	1	10	1	85	100	1



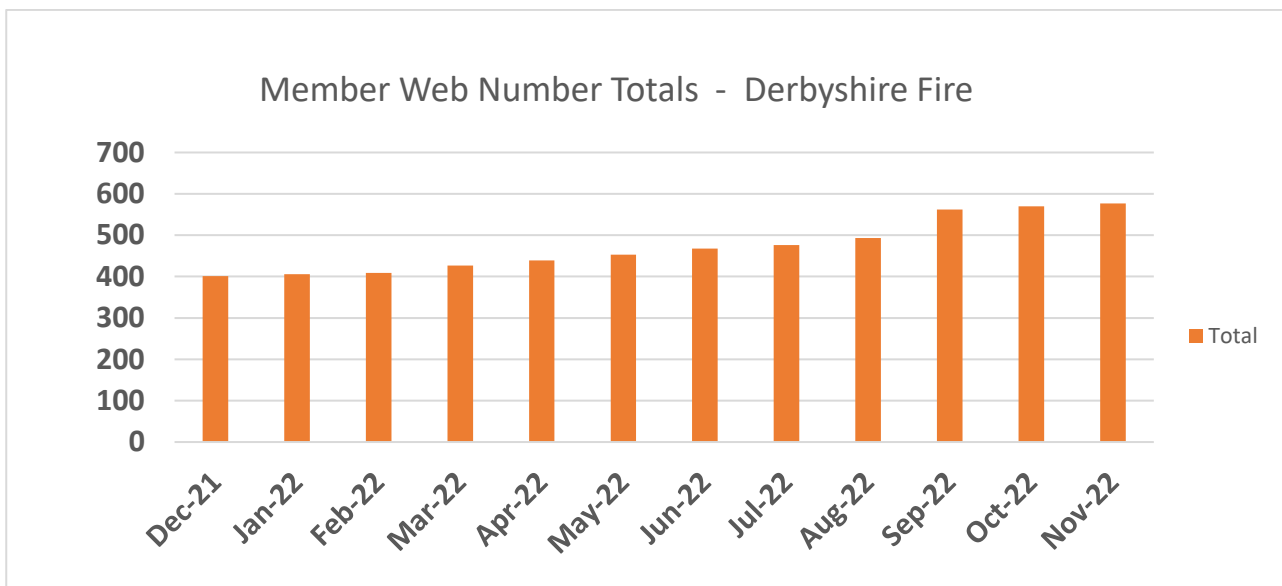
2. Work in Progress



3. Member Web Registrations

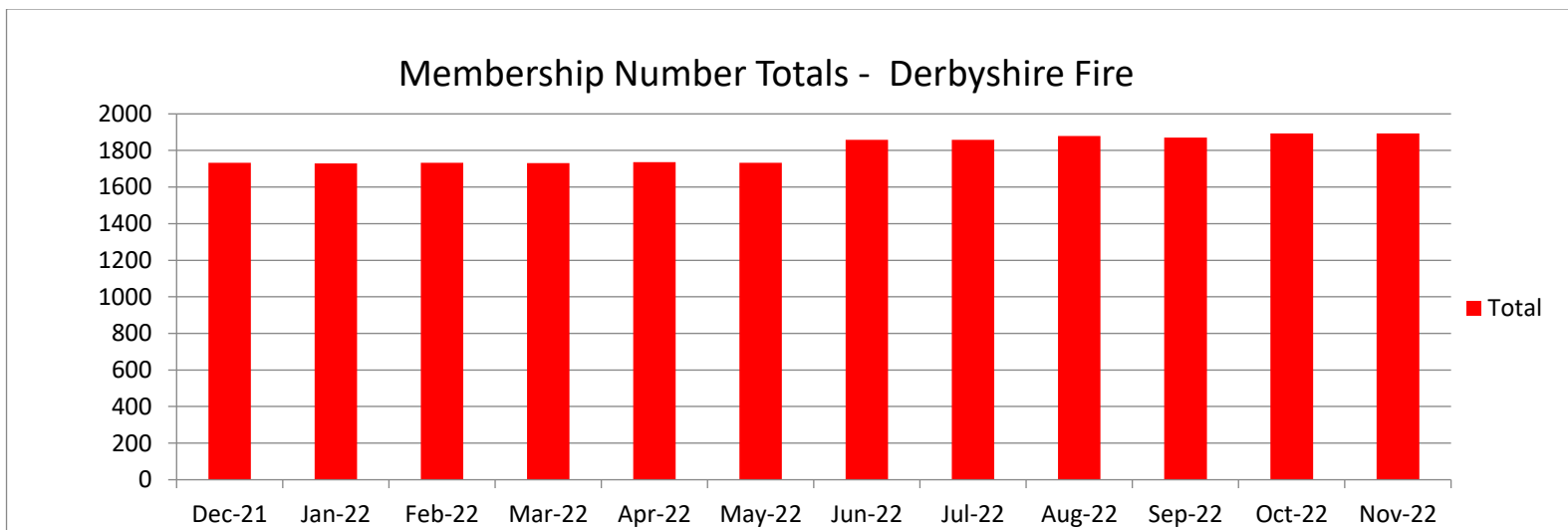
The number of members signed up to member web are:

Status	Number
Active	340
Pensioner	102
Pensioner Ex-Spouse	0
Beneficiary Pensioner	2
Deferred Ex-Spouse	0
Deferred	133

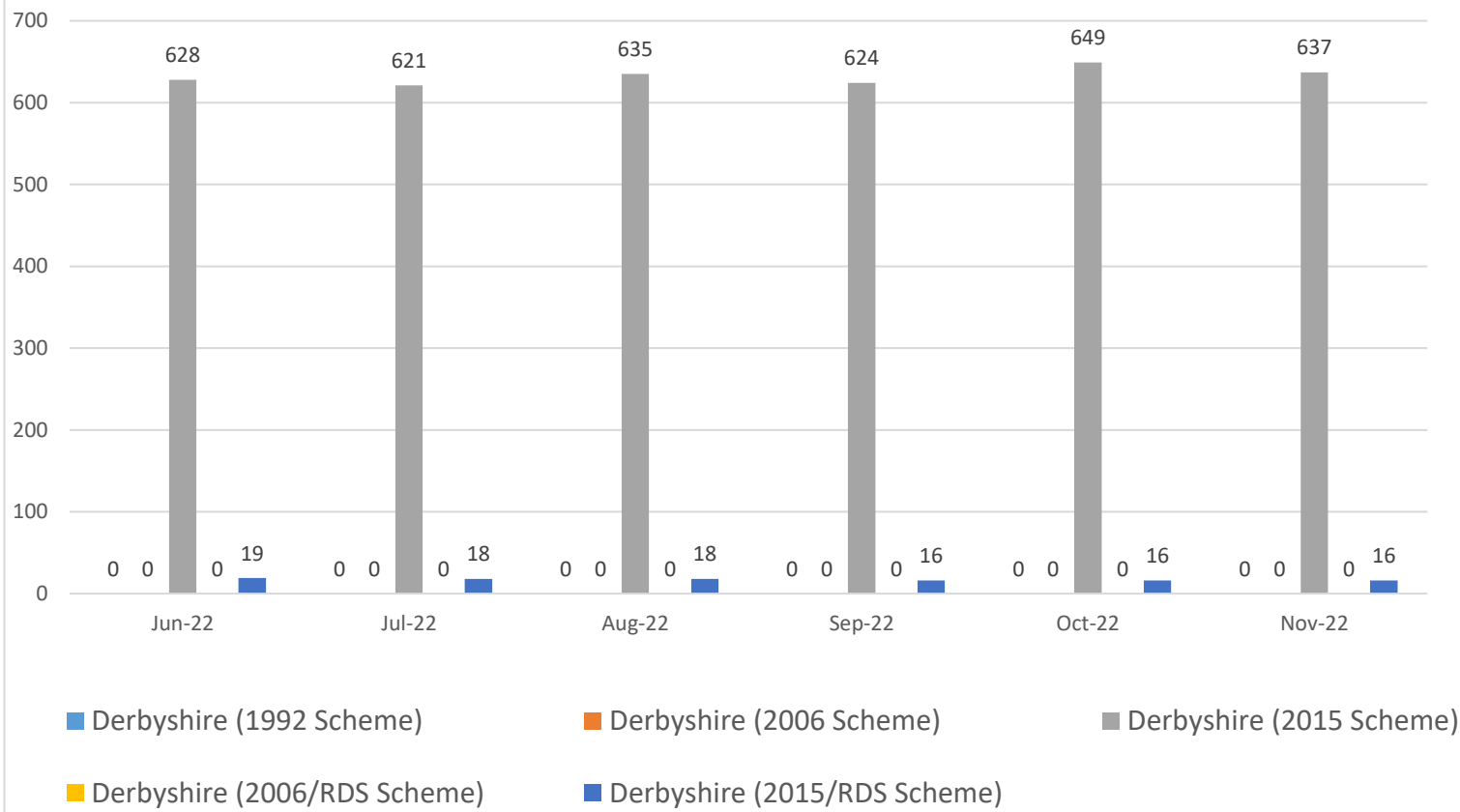


4.Membership Numbers

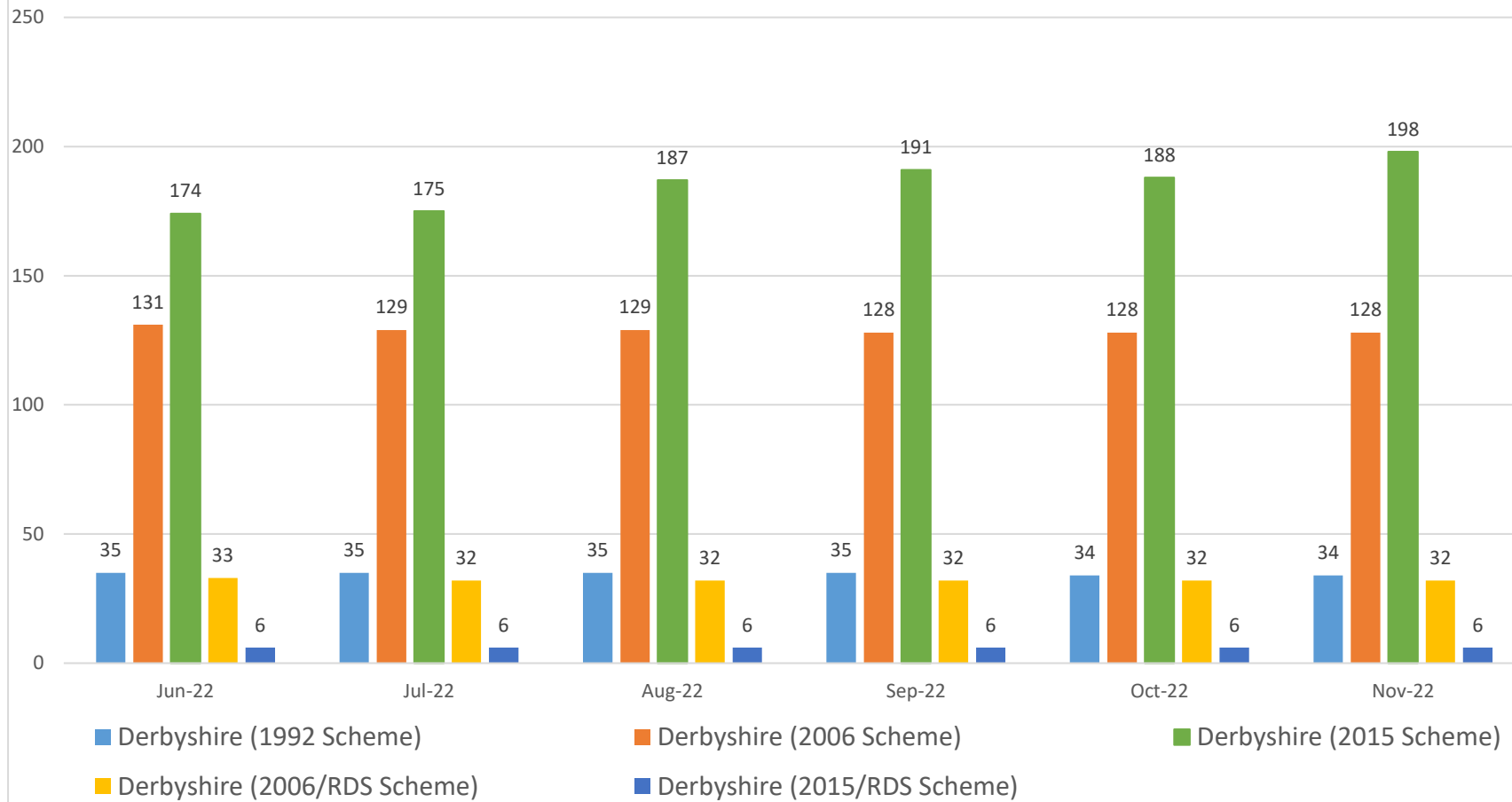
Scheme Name	Active Members	Deferred Members	Pensioners	Beneficiaries	Preserved Refund	Leavers Options Pending
Derbyshire (1992 Scheme)	0	34	606	99	0	0
Derbyshire (2006 Scheme)	0	128	20	10	5	0
Derbyshire (2006/RDS Scheme)	0	32	67	1	0	0
Derbyshire (2015 Scheme)	637	198	16	0	8	5
Derbyshire (2015/RDS Scheme)	16	6	5	0	0	0



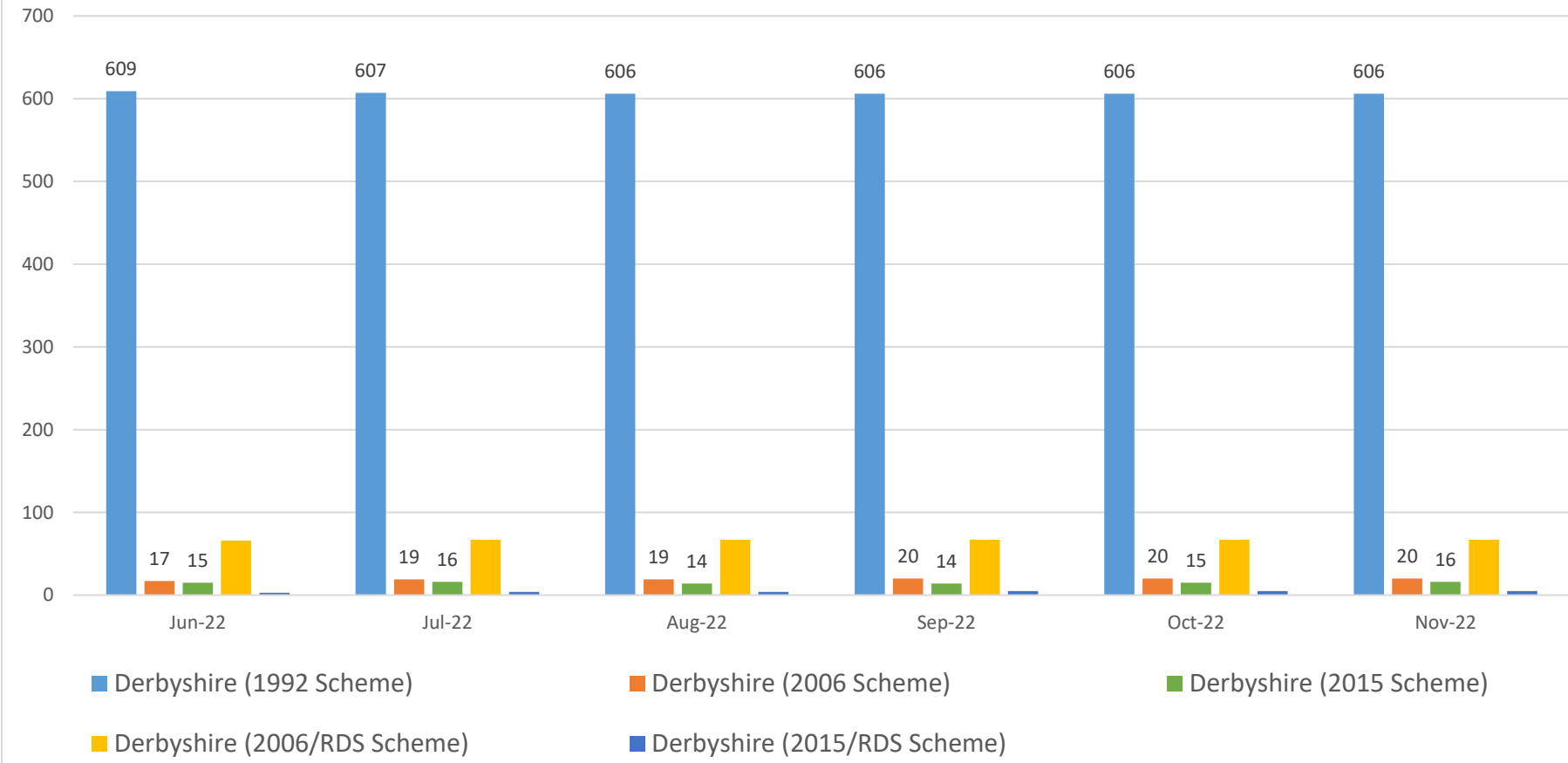
Number of Active Members by Scheme



Number of Deferred Members by Scheme



Number of Pensioners by Scheme



5.Regulations/Fire Scheme Update

Please take a few minutes to read the Firefighters' Pension (England) Scheme Advisory Board Bulletin (Link to Bulletin below) and take any action required. [FPS bulletin 62](#)

FPS

Matthews – FPS member website update

Colleagues who attended the coffee morning on Tuesday 11 October will be aware that we have recently added some additional commentary to the [FPS member website](#) around [the special members second options exercise](#).

Prior to updating the website, we asked stakeholders for their views on what message should be communicated under the 'Do I need to do anything now?' section. An overwhelming majority confirmed that it would be useful to ask individuals, who believe they are in scope for the second exercise, to present themselves to the FRA. To assist with this process, the LGA has provided a [generic proforma](#) for members to complete and set out clear instructions that this should be returned to the FRA.

Unfortunately, we have been made aware that some members are not following this instruction and have instead been forwarding their forms to the administrator. We have therefore added some additional text which states the following:

Please make sure that the form is returned to your FRA or former FRA and not your pension scheme administrator. Forms sent to your pension scheme administrator will not be actioned and your FRA may not then have your details to contact you when the options exercise starts.

Matthews – Member warm up communications

It was agreed at the coffee [morning of the 12 July 2022](#) that generic warm-up letters would be useful for FRAs when communicating with members in relation to the second options exercise. This action was taken forward and discussed at the Fire Communications Working Group (FCWG) [meeting of 16 September 2022](#).

We are pleased to confirm that the content of the letters has been agreed and that the templates for both [in scope](#) and [out of scope](#) retained firefighters have been uploaded to the [Special Members section of the FPS regulations and guidance website](#). FRAs are strongly recommended to use these templates where appropriate.

IQMP – Central list

Following feedback from the sector on the difficulties of identifying an Independent Qualified Medical Practitioner (IQMP) for ill health referrals and reassessments the LGA is proposing to hold a central list of IQMPs that FRAs would be able to approach.

We would therefore appreciate it if FRAs would share with us the contact details of the IQMPs that they currently use, we would then approach the IQMP and ask them for their permission to publicise their contact information on the protected area of the FPS regulations and guidance website.

ACTION: For FRAs to inform the LGA of the IQMPs they use and to provide contact details.

Member communications following eligibility factsheet

[FPS Bulletin 60 – August 2022](#) set out the eligibility criteria for individuals who are eligible for age discrimination remedy and should therefore be deemed in scope.

The bulletin confirmed that sample member communications were being worked on and that they would be made available later. We are pleased to confirm that the Fire Communications Working Group (FCWG) has now met and agreed the content of the letters.

The Fire Technical Working Group (FTWG) suggested at its meeting of 25 July 2022 that all individuals originally determined out of scope should be revisited as best practice. It was agreed that individuals who are now considered to be in scope, after reviewing the [remedy eligibility factsheet](#), should be sent the follow up communication titled 'Originally out of scope - now in scope' and individuals who remain out of scope should be sent the follow up communication titled 'Originally out of scope - still out of scope'. The template letters are available on the [prospective remedy page](#) of the FPS Regulations and Guidance website.

Action: FRAs to send appropriate follow up communication to all individuals originally determined out of scope.

FPS England SAB updates

SAB letter to scheme managers on pension dashboards

In [FPS Bulletin 59 - July 2022](#) we reported on the Department for Work and Pensions (DWP) response to the consultation on the draft Pensions Dashboards Regulations and highlighted that the staging deadline for all public service schemes will be 30 September 2024 and that the requirement to provide value data will be 1 April 2025. As a result of these new legislative requirements, the Chair of the SAB has issued [a letter to scheme managers and Local Pension Boards](#) reminding them of their duties in respect of the new [Pensions Dashboards](#), as scheme managers are ultimately responsible under the regulations for ensuring that dashboard duties are met.

These duties include:

- Working towards the staging date. The Pensions Regulator (TPR) is keen that schemes start planning now to be able to match dashboard requests to scheme records and return the required information to the dashboard. Scheme managers will need to understand how their provider will be able to pick out those requests which correspond to their members and ensure that they are providing information to the right individuals.
- Ensuring the infrastructure is in place to hold and share data with the dashboard: Administrator should be able to tell scheme managers how they are planning to connect whether through the existing software providers or through some other route.
- Reviewing scheme data: The SAB understands that the data which is used for the dashboard is likely to be based on information currently being provided as part of Annual Benefit Statements (ABSs). The SAB is keen to encourage the parties to agree consistent information for those documents, particularly given the challenges arising from the Sargeant remedy and second special members options exercise (Matthews).
- Co-operating with the Money and Pensions Service (MaPS). More information on this can be found from Pensions dashboards: initial guidance

Other News and Updates

Public sector unions granted judicial review over McCloud cost remedy

In [FPS bulletin 59 – July 2022](#) we confirmed that public sector unions had been granted a judicial review in relation to the McCloud/ Sargeant remedy costs in the cost control mechanism. We can now confirm that a date has been agreed for the hearing, it will commence on 23 January 2023 and has been allocated five days.

The Pensions Regulator (TPR) enforcement and prosecution policies updated

On 25 October 2022, The Pensions Regulator (TPR) published the following:

- [revised enforcement policy](#)
- [updated prosecution policy](#)
- [new enforcement strategy](#)

These aim to give clarity on what those who are subject to enforcement action can expect from TPR.

The enforcement policy sets out TPR's approach to investigating cases and any subsequent enforcement action. The policy is now web-based and divided into standalone chapters, each with links to other relevant documents. The policy also consolidates the policies in respect of defined benefit schemes, defined contribution schemes and public service pension schemes.

The prosecution policy explains how TPR will approach prosecuting workplace pension criminal offences. The policy has been brought up to date to reflect the new criminal powers in the Pensions Schemes Act 2021 and other developments.

The enforcement strategy sets out the overarching aims of TPR's enforcement work (excluding automatic enrolment) and provides an insight into the framework TPR applies when selecting cases for enforcement action.

TPR ran a consultation on the revised enforcement and prosecution policies between 4 May 2022 and 24 June 2022 and responded on 25 October 2022. You can access the consultation documents on [the consultations page of TPR's website](#) the consultations page of TPR's website.

For more information, see [the press release from TPR](#). Erica Carroll, TPR's Director of Enforcement, has also published [a blog setting out the reasons for the changes](#)

Pension Dashboards - Progress update report

On 26 October 2022, the Pensions Dashboards Programme (PDP) published its [sixth progress update report](#).

The report covers:

- activity in the six-month period from April 2022,
- focus areas to April 2023
- updates from partners, such as the Department for Work and Pensions and the Pensions Regulator.

Pension Dashboards - Videos published

On 13 October 2022, the Pensions Dashboard Programme (PDP) published two short videos. The first video is called '[Get your data ready for pensions dashboards](#)'. The video aims to give helpful guidance to schemes on how to cleanse data so that it is accurate and up to date.

The second video is called '[An introduction to find and view data](#)'. The video explains the important differences between find data and view data.

Department for Work and Pensions (DWP) respond to further consultation on dashboards

On 17 October 2022, Department for Work and Pensions (DWP) responded to the further consultation on dashboards. This ran from 28 June to 19 July 2022, see [FPS Bulletin 58 – June 2022](#) for more information.

The response confirms that the DWP will:

- Give pension schemes six months' notice of the point at which pensions dashboards will be available to the public, the 'Dashboard Available Point'. This is an increase to the 90 days proposed in the consultation
- Go ahead with the second proposal allowing the Money and Pensions Service (MaPS) and the Pensions Regulator (TPR) to share information about dashboards.

Legislation

Useful links

- [The Firefighters' Pensions \(England\) Scheme Advisory Board](#)
- [FPS Regulations and Guidance](#)
- [FPS Member](#)
- [Khub Firefighters Pensions Discussion Forum](#)
- [FPS1992 guidance and commentary](#)
- [The Pensions Regulator Public Service Schemes](#)
- [The Pensions Ombudsman](#)
- [HMRC Pensions Tax Manual](#)
- [LGA pensions website](#)
- [LGPS Regulations and Guidance](#)
- [LGPC Bulletins](#)

6. Administration Update

TPR Returns

WYPF are completing your returns. As part of the return we must inform the TPR of membership of your Pension Boards, including Board Member names, their position on the Board and contact details.

If you have received an email from Tracy Weaver, please reply as a matter of urgency.

The returns must be submitted to TPR no later than 18 November.

Pension Boards

WYPF are happy to attend all your Pension Boards.

However, with 23 FRAs and Boards often on the same day, sometimes at the same time, it can be quite a challenge to always be at your Boards whilst fulfilling our obligations to other regional and national meetings.

If you would like us to attend your Pension Boards, could you please apply the following so that we have the best chance of attendance.

- Put your FRA name in the title of the Pension Board invitation
- Send the invitation to helen.scargill@wypf.org.uk, matt.mott@wypf.org.uk & Sukhjot.kaur@wypf.org.uk (usually at least one of us will be able to attend)
- Please include a link in the invitation to enable us to join by Teams.

Reporting Breaches

At the Fire Client meeting it was discussed whether Breaches could be included in this monthly report. The short answer is yes they can and it is a good suggestion.

There are, however, several issues to consider:

- Current KPI/reporting of starters and leavers
- FPS regulations/disclosure regulations
- Responsibility and process

We have already started the conversations and review internally at WYPF and already it is apparent this is more complex than first thought.

Once we have further information and we are clear about what/how to report we will be able to bring you further information, this is likely to be in the New Year.

FPS AGM

At the FPS AGM four topics caught our attention, they were:

1. Cyber Security
2. Pension Dashboards
3. Discretions
4. TPR Code of Practice

1.Cyber Security - WYPF has received numerous requests from FRAs and Pension Boards as organisations review their cyber security and add it to their risk registers.

As part of an FRA review of cyber security WYPF can provide a copy of our cyber security document. It is to be treated as private and confidential. It must not be published or shared, however, it can form the basis of a conversation within your organisation and Pension Board.

We will support this document with regular IT updates, including summaries of our disaster recovery testing.

If you wish to have a copy of the cyber security document please email matt.mott@wypf.org.uk

2.Pension Dashboards - Everyone should be aware of the Pension Dashboard and the requirement to comply with the legislation. Most FRAs should already have received a letter from the SAB which includes the bullet points below.

To these bullet points we have added some clarity for your benefit:

- *Working towards your staging date. The Pensions Regulator (TPR) is keen that schemes start planning now to be able to match dashboard requests to scheme records and return the required information to the dashboard. You will need to understand how your provider will be able to pick out those requests which correspond to your members and ensure that they are providing information to the right individuals.*

WYPF have been working with the Pensions Dashboard programme for 12 months assessing the requirements for matching, providing input to the consultation process and participating in relevant technical meetings and briefings.

Matching relies on two factors firstly the information that the individual puts into the MaPS dashboard upon which schemes can match. There are a number of mandatory fields an individual must enter and a number of optional fields. The more data the individual provides the greater the level of confidence of a match.

The second is accurate data. WYPF has a rolling 12-month programme of data quality improvement, this keeps our data quality scores at a high level. For Pensions Dashboard we are modelling our administration data against these matching criteria to establish what levels of matches we are likely to see in various scenario's. This will allow us to specifically target any data areas for any improvements, if needed.

- *Ensuring the infrastructure is in place to hold and share data with the dashboard: Your administrator should be able to tell you how they are planning to connect whether through the existing software providers or through some other route.*

This year WYPF has upgraded its entire technology stack to be ready for the new technology that Pensions Dashboard requires.

We will be working with a third party provider to provide the connection to the Pensions Dashboard Ecosystem and cloud based infrastructure. This is being procured via a formal procurement route. Viable suitable partners have been identified.

Further Clarity - At the AGM there seemed to be uncertainty what FRAs should be doing to prepare for the pension dashboard and what information is to be available to the members.

Data - If FRAs are providing the data requested by WYPF accurately and timely, WYPF should be able to meet the requirements of the dashboard legislation.

If FRAs are not providing accurate and timely data requested by WYPF, please speak to us as a matter of urgency. This is because we will not be able to meet the requirements of the dashboard legislation. The issue is, that it is the FRAs responsibility to ensure the criteria is met and data provided. Furthermore, it is likely the FRA would be brought to the attention of the TPR and would be responsible to resolve the issue, and/or be subject to potential TPR sanction.

Information on the Dashboard - Very simply, the information we will provide is the information included on the Annual Benefit Statement (ABS).

That information will remain on the dashboard until it is replaced by the details of the ABS the following year. Or is replaced by the member leaving the service and benefit values deferred, or if the member retires and benefits are paid the details would be removed from the dashboard as the dashboard does not include information about pensioners.

When it is appropriate the ABS will include remedy values and, therefore, these will be available on the dashboard.

No other data will be provided, all queries and administration activities will continue as they currently do at WYPF.

3.Discretions - There was a break out session at the AGM about discretions and Helen has kindly volunteered to update/colour coordinate the LGA list of discretions. Once this has been completed WYPF will have a closer look at the discretions that we may have authority to implement on behalf of FRAs or form part of core administration practices. We will provide further information in the new year.

4.TPR Code of Practice – Nick Gannon from the TPR spoke about the new code of practice which currently is in draft on the TPR website and is expected to be effective sometime in the New Year. I asked him if the TPR would be willing to visit/speak to schemes and Pensions Boards and he confirmed the TPR will be happy to do this.

Once the new code of practice has come into effect WYPF will liaise with TPR and organise a virtual presentation. We think it would be beneficial if all 23 FRAs could attend and hear from TPR about their new code of practice and what it means to schemes, Boards and administrators.

Data breaches: None this month

7.Member Update

KPI for Deferred Benefits Set Up on Leaving

For some FRAs this KPI was not met this month due to high volumes of leaver information received across all clients. FRAs should be assured all scheme members have received confirmation within 2 months of WYPF receiving the leaver information that they have a deferred benefit. This meets the statutory requirements and the values/details will follow shortly.

KPI for Pension Estimates

For some FRAs the KPI for Pension Estimates was not met this month. This is because estimates with an intended retirement date of 3 months or more in the future are not processed until the more urgent estimates with a retirement date within 3 months have been completed.

8. Communication & Training

Communications PLSA

PLSA are making great efforts to produce and share general pension information.

We would encourage all FRAs to visit their website and access their guides and factsheets, such as Cyber Risk Made Simple.

[Made Simple guides \(plsa.co.uk\)](https://www.plsa.co.uk)

Pre-retirement seminars attended by WYPF during October:

North Yorkshire – 11/10/2022
Durham & Darlington – 14/10/2022
Buckinghamshire – 21/10/2022

Pension boards attended

Staffordshire – 06/10/2022
South Yorkshire – 06/10/2022
Warwickshire – 10/10/2022
Durham & Darlington – 13/10/2022
North Yorkshire – 13/10/2022
Nottinghamshire – 31/10/2022

Pension boards upcoming

Norfolk – 01/11/2022
Warwickshire – 07/11/2022
Leicestershire – 10/11/2022
Dorset & Wiltshire – 16/11/2022
Cambridgeshire – 25/11/2022
Buckinghamshire – 30/11/2022

National meetings Attended

Home Office/SAB Drop in session – 04/10/2022
Home Office/SAB Collaboration – 04/10/2022
Home Office/LGA Matthews – 10/10/2022
Home Office/SAB Collaboration – 12/10/2022
Remedy meeting with LGA – 17/10/2022
McCloud PSS/TWG meeting on RSS – 18/10/2022
Regional Pension Officer Group Chairs meeting – 25/10/2022
Technical Working Group – 25/10/2022
Fire Annual Meeting – 25/10/2022 & 26/10/2022
Public Service Pensions - X Whitehall Project Management Group – 31/10/2022
XWH PMG Wraparound Session (HO) – 31/10/2022

Upcoming

SAB - 8 December 2022

FRA training delivered by WYPF: None

9.IT Update

Disaster Recovery

Please see Disaster Recover summary report below.

Please Note: This document is private and confidential. It must not be published or shared. However, it can form the basis of a conversation within your organisation and Pension Board.



WYPF DR Report
v1.docx

National Fraud Initiative (NFI)

On 10 October we completed the NFI submissions for all FRAs.

This includes mortality screening for all FRAs and for those where we hold payroll data, also reports for injury and re-employed pensioners.

10.KPI Reporting

We expect the new suite of KPIs to be released in the December report.

We are currently finalising the coding and making final adjustments to the processes.

11. Five Year Audit Plan 2019 – 2024

West Yorkshire Pension Fund Five Year Audit Plan 2019 - 2024	Frequency	Last Audit	Recommendations	Days	19/20	20/21	21/22	22/23	23/24	Total
Annual Accounts Verification	Annual	Jul 18	1	10	✓	✓	✓	✓	✓	
Audits Per Year					1	1	1	1	1	5
Benefits										
Local Government Scheme Contributions	2 Yearly	Nov 18	0	20			✓		✓	
New Pensions and Lump Sums - WYPF										
- Normal and Early Retirements	5 Yearly	Mar 15	0	25	✓					
- Death in Service, Post Retirement Widow and Dependent Benefits	5 Yearly	Mar 17	0	20			✓			
- Ill Health Pensions	5 Yearly	Oct 13	2	20					✓	
- Flexible Retirements	5 Yearly	Apr 16	1	20		✓				
- Deferred Pensions	5 Yearly	Mar 18	0	20				✓		
Transfers Out	3 Yearly	Nov 17	0	20		✓				
Transfers In	3 Yearly	Sep 16	2	20	✓		✓			
Reimbursement of Agency Payments	5 Yearly	Mar 18	2	15				✓		
Life Certificates	5 Yearly	Oct 15	0	15		✓				
AVC Arrangements	5 Yearly	Sep 17	0	15				✓		
Admission of New Bodies	5 Yearly	Jan 15	0	20	✓					
Pensioners Payroll	2.5 years	Mar 16	3	20		✓			✓	
Purchase of Additional Pension	5 Yearly	Mar 17	1	15			✓			
Annual Benefits Statements	2.5 years	Oct 16	0	20	✓			✓		
New Pensions and Lump Sums - Fire Service	3 Yearly	Jul 18	1	15		✓			✓	
Audits Per Year					4	5	4	4	4	21

12. Overriding Disclosure Time Limits

Disclosure Requirement	Time Limit	Number of breaches in month
Material alterations to basic scheme information	Within 3 months of the change taking effect	0
Transfer Credits (quote)	Within 2 months	0
Annual Benefit Statements	By 31 August each year	0
Annual Benefit Statement (upon request)	Within 2 months of request, if not already provided within previous 12 months	0
Deferred Benefit Statements	By 31 August each year	0
Deferred Benefit Statement (upon request)	Within 2 months of request, if not already provided within previous 12 months	0
Pension Savings Statements	By 6 October each year	0
Cash Equivalent Transfer Value Out	Within 3 months of request	0
Accessing Benefits before Normal Pension Age	2 month of benefits becoming payable	0
Accessing Benefits on or after Normal Pension Age	1 month of benefits becoming payable	0
Notification of Deferred Benefit entitlement	2 months of being notified of leaver	0

Divorce Time limits

Type of request	Time limit	Number of breaches in month
Request for divorce information only.	3 months from receipt of the request.	0
Request for divorce information where you are notified that the information is required in connection with divorce proceedings that have already commenced.	6 weeks from receipt of the request.	0
Request for divorce information where a Court Order imposes a deadline.	Within the deadline specified by the Court.	0
Request for divorce information where you are notified that a Pension Sharing Order may be issued.	Within 21 days of receiving notification that a Pension Sharing Order may be issued or a date outside 21 days as specified by the Court.	0
Where the request is for information which does not include a Cash Equivalent Transfer Value	1 month from receipt of the request.	0
Pension Sharing Order received but some information* and/or charges are still outstanding.	A letter to both parties needs to be sent out within 21 days of receiving the Order to explain the Order cannot be implemented and request the missing information and/or charges.	0
Pension Sharing Order received including all relevant information* and charges.	A letter** must be sent to both parties within 21 days of the start of the implementation period notifying them of the deadline.	0
Pension Sharing Order Received including all relevant information and charges.	4 months to implement the Order of the date of receipt of the final information which allows calculation	0
PSO has been implemented.	A letter* must be sent to both parties within 21 days of implementing the PSO to notify both parties their entitlement.	0

13. Calendar of Events

January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's Life Certificates Pensioner Newsletter
May	June	July	August
Life Certificates	Active Newsletter Life Certificates Issue Deferred Annual Benefits Statements	Life Certificates Issue Deferred Annual Benefits Statements Issue active Annual Benefits Statements	Issue active Annual Benefits Statements Life Certificates
September	October	November	December
Pension Estimates Assumption Exercise Life Certificates Pension Savings Statement	Life Certificates Participate in NFI tPR Scheme Returns	tPR Annual Survey Life Certificates	IAS19 Data capture exercise for Actuaries Life Certificates