



NOTTINGHAMSHIRE
Fire & Rescue Service
Creating Safer Communities

LOCAL FIREFIGHTER PENSION BOARD (LFPB)

SCHEME MANAGER'S UPDATE

Report of the Scheme Manager

Agenda Item No: 6

Date: 3rd July 2026

Purpose of Report:

To update Board members on current and recent pension issues affecting the Nottinghamshire Firefighter Schemes.

Recommendations:

That Board members scrutinise the content of this report and seek assurance that the current pension issues are being progressed.

CONTACT OFFICER

Name : Maria Fox, Scheme Manager

Tel : 0115 8388648

Email : maria.fox@notts-fire.gov.uk

1. BACKGROUND

- 1.1 The Local Firefighter Pension Board (LFPB) is responsible for assisting the Scheme Manager in ensuring the effective governance and administration of the firefighter pension schemes. In order to fulfil this responsibility, it is important that Board members are aware of significant pension issues and can be assured that these issues are being dealt with.
- 1.2 Pensions have grown in significance over past few years. Legal challenges have resulted in the passing of national regulations that require pension remedy to be implemented, requiring redress for some employees with retrospective membership allowed as well as compensation payments.
- 1.3 The purpose of this report is to inform members of the Board of all current and recent pensions issues which are being or have been dealt with, and the implications of these issues. This report is an update on the report titled "Current Issues" circulated to the LFPB in September 2025.

2. REPORT

- 2.1 The Board has previously received updates on the Sargeant/McCloud age discrimination remedy process for wholetime firefighters and the Matthews second options exercise for on-call firefighters.
- The Sargeant/McCloud Remedy relates to age discrimination held to have arisen from the transitional protection arrangements upon the introduction of the 2015 scheme.
 - The Matthews Second Option exercise relates to certain former and current on-call firefighters who are now able to buy back 2006 modified scheme membership from the start of their applicable service (which in some cases stretches back to the 1960s), as part time workers. Around 580 active and retired personnel are identified as being in scope.
- 2.2 National regulations for both processes took effect from 1 October 2023, with an intended 18-month implementation period. However, in late 2024, the government consulted on further changes to the Matthews regulations, including extending the implementation deadline to March 2026. The amended regulations to enable the changes took longer than expected and are effective from 1 April 2026, with the implementation deadline now further extended to 31 March 2027.
- 2.3 The focus remains firmly on delivering both remedy and second options. There have been and continue to be numerous complexities requiring national resolutions, these have included issues around:
- taxation,
 - the interplay of schemes,
 - developments in the scope of eligibility,
 - pensions software capability and development
 - and national calculator tools.
- 2.4 Recruiting and retaining sufficient knowledgeable and experienced staff remains a key challenge across Fire and Rescue Services and Administrators. Staff morale continues to be highlighted nationally as a concern. Together with the issues around national guidance and regulations, these difficulties mean that it is proving to be unachievable to progress the remedy and second options exercise for Matthews in line with the original envisaged timescales.
- 2.5 As previously reported, within NFRS resources have been increased temporarily to support the pensions work. In addition, a number of the permanent roles involved in supporting the pensions board and the wider pensions remedy work have also now been successfully recruited to and staff are in post.
- A new experienced Scheme Manager joined NFRS in February 2026
 - A new experienced Payroll & Pensions Manager joined NFRS in July 2025
 - An experienced existing member of the NFRS HR team was promoted to HR Manager in October 2025.
 - Shared Regional Pension Expert support was agreed during 2025,
 - A handover from the interim arrangements made for the Scheme Manager role put in place from October 2025 to February 2026 is now taking place.

Main Areas of Update Since September 2025 (last report)

- 2.6 The Government confirmed some time ago that claims for 'Injury to Feelings' compensation, arising from the age discrimination, are being dealt with nationally with the Fire Brigades Union, this continues to be progressed in conjunction with Thompsons Solicitors.
- 2.7 National guidance is awaited following the Pension Ombudsman's 'Cheshire' determination. This relates to the pension benefits of retained firefighters whose service started before April 2006 and who became wholetime with a different brigade whilst remaining in their retained role at the Cheshire Fire and Rescue service. There may also be an impact on certain personnel who were retained at NFRS and became wholetime also at NFRS.
- 2.8 A revised Member Contribution Structure came into effect nationally on 1 April 2026. This has revised the percentage of pensionable pay that members contribute to the Scheme. Further details are provided below.
- 2.9 The new national Pensions Dashboard is intended to enable people to find summary details of all their pensions in one place. Work is progressing on this initiative.
- 2.10 The Pensions Act 2004 requires that The Pensions Regulator be informed of breaches of the law where that breach is likely to be of material significance, the list of reported breaches is shown at Appendix A.
- 2.11 The Board may recall that during 2025, the LGA started a conversation about how its fire pensions support team can best support the sector. This ranged from maintaining current arrangements, expanding their support, through to a national delegated scheme manager arrangement. The LGA continues to work through the options.
- 2.12 A new national website for scheme members has recently been launched, which can be seen at <https://fpsmember.org/> . This has been publicised within the Service.
- 2.13 The West Yorkshire Pension Fund (WYPF) Administrator contract has been extended to 30 November 2027. A national Oversight Board chaired by the LGA was also formed in January 2026, in recognition of the Remedy and Matthews delivery risks across all WYPF's fire service clients. The Board is both supporting but also challenging WYPF to deliver Remedy and Matthews in an orderly and prioritised manner, while maintaining Business as Usual service levels. The Regional Pensions Advisor is the Scheme Manager representative on the Board.
- 2.14 The risk register has been thoroughly reviewed and updated and is the subject of a separate report elsewhere on the agenda.
- 2.15 The Public Service Pension Scheme Governance and Administration Survey was submitted in March 2026, as requested by the Pensions Regulator. The Regulator's code of practice sets out expectations of the conduct and practice that scheme governing bodies should meet to comply with their duties in pensions legislation.

The Scheme Manager proposes to arrange an assessment against these expectations.

- 2.16 Actions are set out in the LGA's monthly Scheme Bulletin, and the Scheme Manager proposes to report these to the Board in future, as an aid to good governance and oversight.
- 2.17 Earlier in 2025, the Pensions Ombudsman concluded that they do not have jurisdiction to investigate complaints about the application of the Firefighters' Compensation Scheme 2006, in the light of another legal judgment. The Fire Brigades Union has secured a claim for Judicial Review of this decision. The Board is also informed that the LGA has been leading a review of the Compensation Scheme.
- 2.18 The LGA continues to offer training for Local Pension Board members. The 2026/27 programme has been released, and details can be found at <https://www.fpsboard.org/index.php/local-pension-boards/training> Board members are encouraged to take advantage of the training and development offer and the reference materials.
- 2.19 The report concludes by presenting the LGA's look ahead through the remainder of 2026.

Detailed Update

- 2.20 The Sargeant / McCloud Age Discrimination Remedy has around 600 active, deferred and retired personnel's pension accounts in-scope for Remedy, mostly wholetime.

Table 1 - Sargeant/McCloud Statistics	No of Members Affected
<u>Active Members</u> - Percentage of 2025 Remedial Service Statements (ABS-RSS) issued to active members in-scope of Remedy by the due date of 31 August 2025.	91%
<u>Active Members</u> - Percentage of ABS-RSS's not issued on time. Note: This was due to a range of legal and technical issues that were not resolved including previous inter-brigade transfers, pension sharing orders and where the benefits could be affected by the Matthews exercise.	9%
<u>Active Members</u> - Number of ABS-RSS's Still Outstanding. Note: These statements set out the member's position under their legacy scheme (1992 or 2006) and the reformed scheme (2015), based on pay and service data to 31 March 2025. There is also a projection assuming retirement on their 60th birthday.	7%
<u>Active Members</u> - who chose to receive a refund of excess contributions. Note: These payments/refunds can be left until retirement, this being the point at which individuals will actually make their formal 'deferred choice' decision as to which scheme they were deemed to be in for the Remedy period. Backdated contributions can then be offset from the lump sum due to the member, so no actual cash payment is required.	51 – 2006 Scheme refund 11 – 1992 Scheme payment
<u>Deferred (non-active) Members</u> – 2025 RSS Statements Outstanding: Note: 2024 RSS statements for deferred (non-active) members were not issued and the 2025 statements have similarly not been issued for members in scope for Remedy. WYPF is presently unable to provide a confirmed timeline for when the first statements will be able to be produced. Figures can however, be produced upon request for any deferred members who are close to the deferred pension age and considering putting their pension into payment.	124
<u>Pensioners (known as Immediate Choice) Members</u> , in scope for Remedy. Note: WYPF will contact them in due course, to provide an IC-RSS that explains the difference between the two sets of benefits to which they are entitled (their legacy 1992/2006 scheme and the 2015 scheme).	205

Table 1 - Sargeant/McCloud Statistics	No of Members Affected
<u>All Members</u> – who opted out of the pension scheme due to the introduction of the reformed scheme in 2015, before the finding of age discrimination and the Sargeant/McCloud remedy. Note: Such members are entitled to opt back in for the Remedy period retrospectively and to not suffer detriment, by making a 'contingent decision'. A recent Government Written Ministerial Statement has now set out how this should be addressed for the Remedy period, so that members will be able to opt back into their legacy scheme for the Period; and if they opted out in the months leading up to April 2015, to reactivate their deferred pension record for that opted out period. This highly complex issue applies to a small number of personnel across the sector.	5

- 2.21 Matthews Second Options Exercise - There are 580 former and current on-call personnel potentially in-scope to buy back pension entitlement to the start of their on-call service. Positive progress is continuing to be made within the Service to address these cases as follows:

Table 2 - Matthews Second Option Cohorts (Data as at April 2026)	No Of Members
Members sent letters in December 2025 who did not respond – chaser follow up letters have been sent out in April 2026.	197
Statements setting out the individual options sent to those who expressed an interest.	219
Members sent their figures but have not yet returned their Options Election – chaser follow up letters have been sent out in April 2026	58
Members not wishing to proceed	9
In progress figures being calculated	71
Members being sent a pack to make their options election by WYPF	26
Members In Scope	580

There is likely to be a balance remaining for the Matthews Second Option Cohorts which will included one-off death grants paid by the Service, those found not to eligible under current legislation, and where beneficiaries cannot be traced.

- 2.22 Barring ongoing work in hand, there are some remaining statements setting out individual options that cannot yet be sent for a range of reasons, predominantly because legislative amendments, further detailed data or national calculators yet to be issued by the Government Actuary's Department (GAD) are required. The pensions team have recontacted all members who have expressed an interest and those that did not wish to proceed by registered post throughout April and May 2026. This is to check that the individuals have received and understood their figures and to answer any questions. The result is that 161 individuals have confirmed they wish to proceed and have been sent to WYPF to pay, of which 18 have been paid out. There is presently no definite timescale for when the remaining cases to be completed and paid as WYPF has a significant queue of cases to process across fire clients, with limited capacity.
- 2.23 A national resolution is required where more income tax is deducted from the pension arrears than would have been the case had the additional pension been paid over the years. There is no agreed national mechanism in the tax system to

adjust or recover this tax, so any recompense is awaiting a compensation process yet to be determined nationally.

2.24 In December 2024, the Government consulted on changes to the Matthews regulations, including extending the implementation deadline to March 2026. The Government's response was published in December 2025 and can be seen at <https://www.gov.uk/government/consultations/amendments-to-the-firefighters-pensionscheme-retained-firefighters/outcome/amendments-to-the-firefighters-pension-schemeengland-retained-firefighters-government-response>.

2.25 Amended regulations came into effect on 1 April 2026 to enable the changes set out in the response, which include:

- Support implementation, via an extension of time limits to 31 March 2027 to help FRAs and Administrators overwhelmed with the volume of cases;
- Address policy inconsistencies, by enabling parity on conversion options for all cohorts of member; and
- Mitigate legal challenge, including payment of missed pension/lump sum and associated survivor benefits; extension to 'additional death grant' eligibility; and alignment of scheme membership entitlement for individuals who opted out of standard 2006 scheme service with those who never joined.

2.26 A Revised Member Contribution Structure - came into effect nationally on 1 April 2026, affecting how much of their pensionable pay members contribute and this has been publicised within the service. The structure has been amended as follows:

- An additional band has been introduced, increasing the bands from four to five;
 - Contributions for retained contracts are also based on actual pensionable pay rather than wholetime equivalent pay; and
 - From April 2027 the bandings will be increased each April in line with CPI, to allow for futureproofing.
- The revised structure means that:
 - Wholetime equivalent pay to actual pay: this is a change for part-time and retained firefighters, whose banding is now be based on their actual pensionable pay, instead of the wholetime equivalent for their role.
 - Annual Assessment: the Service will determine the initial contribution rate at the start of each scheme year (1 April). New joiners will be assessed on date of joining.
 - Pay changes during the year: services should adjust contribution bands where a change in pensionable pay is permanent or expected to continue.
 - Multiple employments: where an individual has more than one firefighter job (e.g. wholetime and retained), each job is treated separately. A distinct contribution rate is set for each employment based on the actual pensionable pay for that specific role.

- The new contribution bandings are shown in Table 3 below and the LGA has developed implementation guidance for the sector.

Table 3

		Comparison table	
Existing structure		New Structure wef 1 April 2026	
Pensionable pay (FTE)	Contribution rate	Actual pensionable earnings	Contribution rate
Up to £27,818	11.0%	Up to £36,130	11.09%
£27,819 to £51,515	12.9%	£36,131 to £45,407	12.59%
£51,516 to £142,500	13.5%	£45,408 to £66,908	14.09%
£142,501 or more	14.5%	£66,909 to £190,691	15.590%
		£190,692 or more	17.09%

- Key details of the revised structure were recently added to the scheme member website, where they can be found in section 2 at <https://fpsmember.org/fps-2015/contributions>.
- The Government's response to the consultation, setting out the rationale and detail of the revised structure, can be found at <https://www.gov.uk/government/consultations/firefighters-pensions-member-contributionstructure/outcome/amendments-to-the-firefighters-pension-acheme-engand-regulationsmember-contribution-structure-government-response>.

2.27 Update to Scheme Valuation (SCAPE) Rate – The UK Government has recently updated the SCAPE (Superannuation Contributions Adjusted for Past Experience) discount rate, setting it at CPI+2%. This key financial assumption determines the employer contributions and costs for unfunded public service pensions which include the Fire Fighters Pension Scheme. This change causes some temporary calculation suspensions whilst the new rates are implemented. SCAPE is the process the UK Government uses to calculate the value of future public sector pension benefits in today's terms. Because these pensions are paid out over many years, actuaries use a "discount rate" to assess how much money the government and public sector employers need to set aside today to cover future promises. The change is particularly relevant to the following groups:

- An Active FPS member (i.e. serving and paying into FPS 2015) who is a legacy FPS 1992 member
- Particularly topical to any of the above group who have sought or received a retirement estimate or are currently working their retirement notice

The Service has received notification from government of revisions to the FPS 1992 commutation factors which are effective from 21 May 2026. These revisions may have a significant impact on levels of commutation available to members.

(Commutation refers to the process of giving up a portion of a regular, ongoing pension income stream in exchange for an immediate, one-off lump sum cash payment.) The change will mean:

- Members who are currently working their retirement notice will be contacted directly by the Service and will soon receive a replacement retirement benefit pack with revised lump sum options from WYPF.
- For members who are awaiting a retirement forecast from WYPF, such forecasts will automatically reflect the revised commutation factors.
- For members who have already received a retirement forecast from WYPF, the lump sum options illustrated will now be overstated. Further updates will be provided by WYPF as to how members can request updated illustrations with revised commutation factors.

2.28 Pensions Dashboard - The new national Pensions Dashboard is intended to enable people to find summary details of all their pensions in one place. Further details can be found at <https://www.pensionsdashboardsprogramme.org.uk/>. The 'staging date' for all three firefighter pension schemes (1992, 2006 and 2015) to connect was 31 October 2025, in good time for the legislative deadline of 31 October 2026. Whilst legal responsibility rests with the Combined Fire Authority, the dashboard is primarily a task for WYPF as administrator. WYPF was essentially ready for 31 October 2025, however, connection was then delayed by a technical issue and the volume of schemes queuing to connect nationally. Connection was achieved in early February 2026 and there are currently no grounds for concern. There will be a national announcement on when the dashboard will be made live and available to the general public, expected to be in 2027. The implementation will transition to Business as Usual for responding to data requests as people use the dashboard.

2.29 Breaches - The Pensions Act 2004 requires that The Pensions Regulator be informed of breaches of the law where that breach is likely to be of material significance. In October 2025, WYPF submitted a breach of law report to the Pensions Regulator regards the failure to issue Annual Benefit Statements to deferred members by 31 August 2025. The Scheme Manager plans to submit an updated breach report to The Pensions Regulator, covering all outstanding Remedy statements and potentially the delays to the Matthews exercise, once WYPF's delivery plan becomes clearer. Guidance is expected from the national WYPF Oversight Board in the light of an updated delivery plan. There are no other known breaches to report.

2.30 West Yorkshire Pension Fund (the Scheme Administrator) - A tailored monthly client report is received from WYPF, which provides useful general administrative information, local scheme statistics and enables any specific issues to be picked up and addressed. The latest report is presented as part of the West Yorkshire Pension Fund Report and Update report elsewhere on the agenda. There have been ongoing discussions between WYPF and its numerous Fire clients regarding the range of outstanding work, prioritisation and expected delivery timelines, which had become a significant concern across the sector and given the complexity of the issues and risks and therefore a national Oversight Board chaired by the LGA was

formed in January 2026. The Board meets weekly and both supports and challenges WYPF to deliver Remedy and Matthews in an orderly and prioritised manner, while maintaining Business as Usual service levels. The Regional Pensions Advisor is a Scheme Manager representative on the Board. Significant improvements will, however, take some time to be felt and will not be easy to deliver - in particular, the recruitment and development of suitably skilled and experienced staff and the development of core IT systems to automate processes. The Board has already discussed prioritisation and how the sector can help WYPF; and has requested a detailed delivery plan for review and discussion. Updated guidance has been issued to services, for example, on making requests for pension benefit estimates and notifying retirement. The Administrator contract between the Service and WYPF has been extended to 30 November 2027, as permitted. Variations are proposed to bring the contract into line with other WYPF fire clients and in recognition of how the service operates in practice.

2.31 Pensions Regulator - The Regulator's Code of Practice sets out expectations of the conduct and practice that scheme governing bodies should meet in order to comply with their duties in pensions legislation. It applies to governing bodies of occupational, personal and public service pension schemes. As a matter of best practice and in the interests of good governance, the Scheme Manager proposes to arrange an assessment against these expectations. Details of the code can be found at <https://www.thepensionsregulator.gov.uk/en/document-library/code-of-practice>. The Public Service Pension Scheme Governance and Administration Survey, was submitted in March 2026, as requested by the Regulator. The survey will help the Regulator to determine how schemes are progressing on meeting the expected standards, so it can focus on areas where they may need more support. When last conducted in 2023, 94% of all public service pension schemes completed the survey, which helped build a comprehensive picture of governance and administration standards. The Regulator hoped that all public service pension schemes would participate in this year's research. The survey included questions on a range of topics:

- Governance
- Managing risks
- Administration and record-keeping processes
- Annual Benefit Statements
- Reporting breaches
- Improvements to governance and administration
- General Code of Practice

WYPF submitted the annual scheme returns in early December, ahead of the statutory deadline. It was noted that the data quality scores had reduced and did not fully reflect the underlying data quality, due to the ongoing age discrimination remedy process. As records are moved between reform and legacy schemes, and as additional or amended information is applied, data quality scores fluctuate temporarily. Once the rollback process has been completed and the remedy fully

implemented, WYPF expect the scores to be broadly consistent with those submitted in previous years.

- 2.32 Actions arising from the LGA Scheme Bulletin - The LGA produces a monthly Scheme Bulletin which provides a range of updates and information, and identifies actions for scheme managers, administrators and local pension boards. They can be found at <https://www.fpsregs.org/index.php/bulletins-and-circulars/bulletins>. As an aid to good governance and oversight, the actions from these Bulletins will be reviewed and reported to future meetings of this Board along with any issues identified.
- 2.33 Firefighters' Compensation Scheme - Earlier in 2025, the Pensions Ombudsman concluded that they do not have jurisdiction to investigate complaints about the application of the Firefighters' Compensation Scheme 2006, in the light of another legal judgment. The Fire Brigades Union has more recently issued a claim for Judicial Review of this decision. The FBU statement can be seen at <https://www.fbu.org.uk/circulars/2025hoc0394mr/pensions-jurisdiction-pensionsombudsman-po-judicial-review>. Although not directly linked to Pensions, the Board may also wish to be aware that the LGA has been leading a review of the Compensation Scheme. This is with a view to making recommendations to Government to ensure that the Scheme remains fair, effective and sustainable.
- 2.34 Looking ahead into 2026 - In the December 2025 bulletin, the LGA looked ahead into 2026. Whilst time has moved on, this may still be helpful to the Board, so is set out below. The Firefighters' Pension Scheme faces another year of change and the continued implementation of the remedies. Below is an overview of the key developments expected to shape the landscape for scheme managers, administrators, and members.
- Sargeant age discrimination remedy:
 - The issuance of remaining RSSs remains a top priority
 - Ongoing processing of contingent decision and compensation claims
 - Awaiting details of the approach for the reinstatement of service for FPS 1992
 - contingent decision opt-out cases
 - A final amendment is expected to tax regulations to cover any remaining outstanding tax matters and immediate detriment cases.
 - Matthews second options:
 - Ongoing implementation, alongside legislative amendments
 - Introduction of a compensation framework [for excess tax]
 - Potential for further developments in the ongoing aggregation cases [where members have wholetime and retained service that could be linked].
 - Governance and Compliance:
 - Local Pension Boards continuing to assess compliance against the Pension Regulator's General Code of Practice

- Pensions Dashboards – Scheme Managers should ensure their administrators are connected and continue to cleanse and improve data in preparation for dashboards going live to the public.
- Scheme Advisory Board focus on:
 - Improving demonstration of Board governance compliance
 - Encouragement of the sector to enhance digital offering through administrators' software providers (member self-serve)
 - Regular review of Board policies and development of Equality, Diversity and Inclusion policy
 - Continued work through the Local Pension Board Effectiveness subcommittee in supporting Local Pension Boards.

3. FINANCIAL IMPLICATIONS

- 3.1 The costs associated with the McCloud and Matthews remedies are expected to be directly funded from the Government. The Authority holds a £200k earmarked reserve which was initially created to cover potential costs of implementing the McCloud remedy in advance of the legislation being laid. Whilst the legislation has now been passed and this risk has reduced, due to the complexities and risks that remain regarding the McCloud remedy and Matthews second options exercise the reserve is being retained to cover any costs that may not be funded by the Government.
- 3.2 Additional day-to-day costs are being incurred, for example staffing, systems and legal support. Some Government funding is received towards these costs.
- 3.3 Any financial implications for the Authority will be reported to the Finance and Resources Committee.

4. HUMAN RESOURCES AND LEARNING AND DEVELOPMENT IMPLICATIONS

There are human resources implications arising directly from this report, in that pension matters affect most employees. HR department staff are fully involved in pension issues to ensure that human resources implications are taken into account.

5. EQUALITIES AND ETHICAL IMPLICATIONS

An equality impact assessment has not been carried out as this is not a new policy.

6. ENVIRONMENTAL AND SUSTAINABILITY IMPLICATIONS

There are no environmental and sustainability implications arising from this report.

7. LEGAL IMPLICATIONS

The Public Service Pensions Act 2013 introduced a framework for the governance and administration of public service pension schemes. This report aims to fulfil the requirement for Pension Board members to assist the Scheme Manager in ensuring that effective administration arrangements are in place.

8. RISK MANAGEMENT IMPLICATIONS

There are a number of risks relating to the firefighter pension schemes, and these have been presented to the Board in the form of a risk register. The Scheme Manager is responsible for ensuring that the risks identified are appropriately managed. All of the issues outlined in this report are being or have been dealt with by close co-operation between the pension administration team and Officers.

The Firefighter's Pension Scheme – impact of McCloud remedy and Matthews / O'Brien case is included on the Corporate Risk Register and is currently rated high due the complexities, the lack of specialist resources at a national and local level, the pension regulation breaches reported to The Pension Regulator for failure to meet the ABS and RSS deadlines and the IDRPs cases.

9. RECOMMENDATIONS

That Board members scrutinise the content of this report and seek assurance that the current pension issues are being progressed.

10. BACKGROUND PAPERS FOR INSPECTION (OTHER THAN PUBLISHED DOCUMENTS)

None

Maria Fox
Head of Finance & Treasurer (Section 151 Officer)
SCHEME MANAGER

Appendix A

NFRS Register of Fire Fighter Pension Fund Breaches

Number	Date	Brief Description	Red / Amber / Green Assessment	Officer Responsible for Assessment	Outcome	Date Reported to TPR
001	31/8/2016	Failure to meet ABS deadline – all employees due to system failure.	Red	Head of Finance / Scheme Manager	Breach	31 August 2016
002	31/8/2017	Failure to meet ABS deadline – 5 employees in transition.	Green	Scheme Administrator	No Breach	N/A
003	09/07/2024	Failure to meet ABS deadline – for active and deferred employees in scope for pension remedy	Red	Head of Finance / Scheme Manager	Breach	Reported by WYPF 4 Oct 2024 and by Scheme Manager 14 Oct 2024.
004	31/03/2025	Failure to meet RSS deadline – for active and deferred employees in scope for pension remedy (and Immediate Choice – Pensioners)	Red	Head of Finance / Scheme Manager	Breach	Reported by WYPF 17 April 2025 for active and deferred employees in scope for pension remedy. Reported by Scheme Manager 9 May 2025 for active and deferred employees in scope for pension remedy.