

April 2022

Nottinghamshire Fire Authority

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1. **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 55](https://fpsregs.org/images/Bulletins/Bulletin-55-March-2022/Bulletin-55.pdf)

**FPS**

**Home Office consultation response and amending legislation**

On 8 March 2022, the Home Office published its [consultation response on prospective remedy](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1059357/08_03_2022_Firefighters__Pension_Scheme_Prospective_Remedy_Consultation_Response_FINAL.pdf), along with [a frequently asked questions document](https://www.fpsregs.org/images/Age-discrimination/HO-FPS-prospective-remedy-consultation-response-comms-briefing-pack.pdf) .

The consultation response confirms the amendments to the pension scheme regulations which will deliver the first set of changes and remove the transitional protections from the FPS 2015. In addition, it confirms provisions for an ill health underpin which will ensure that a protected member who applies for ill health retirement before 31 March 2022, and which is determined in their favour after that date, is treated no less favourably than if the application had been determined on that date.

The Home Office has identified one scenario where a member who transitions on 1 April 2022 with an ill-health decision pending could be placed in a worse position. This would be where a legacy FPS 1992 member moves across to the FPS 2015 and does not meet the qualifying criteria for ill-health retirement in the FPS 2015 but would have met the corresponding criteria under the legacy FPS 1992.

To avoid any such members being in a worse position than if the decision had concluded prior to 1 April 2022, changes have been made to the FPS 2015 regulations which mean that the member is assessed for ill-health retirement against a Normal Pension Age (NPA) of 55.

The response also makes provisions to allow arrangements for members who are purchasing service in the legacy schemes by way of periodical contributions, entered before 1 April 2022, to continue on after that date.

These changes enact the policy announced in February 2021 and are consequential to the provisions in the Public Service Pensions and Judicial Offices Act 2022 (PSPJOA 2022) which received Royal Assent on 10 March.

[The Police and Firefighters’ Pension Schemes (Amendment) Regulations 2022](https://www.legislation.gov.uk/uksi/2022/336/regulation/2/made)  were laid in parliament on 21 March. The amendments come into force on 1 April 2022 and enable the prospective elements of the 2015 Remedy as set out in the consultation.

A further Home Office consultation will take place later in the year on the retrospective amendments that are required to fully deliver the remedy. This includes establishing the deferred choice underpin (DCU) and the changes needed to offer pensioners and beneficiaries of deceased scheme members an immediate choice between legacy or reformed scheme benefits

**Matthews – Second options exercise**

Readers may be aware of the category of members of the Firefighters’ Pension Scheme 2006 (FPS 2006) known as “special members” who were introduced in 2014, following [Matthews v Kent and Medway Towns Fire Authority & others](http://www.bailii.org/uk/cases/UKHL/2006/8.html), which allowed retained firefighters employed between 1 July 2000 and 5 April 2006 to join the FPS 2006 with retrospective effect to 1 July 2000.

A time-limited options exercise took place between 2014 and 2015 to allow eligible individuals to join the FPS. While the benefits awarded to special members largely mirrored the benefits under the FPS 1992, the FPS 2006 was amended as the FPS 1992 was closed.

More recently, work has again had to take place on the pensions aspect of "Matthews", following the European Court of Justice’s decision in [O’Brien v Ministry of Justice](https://www.bailii.org/eu/cases/EUECJ/2018/C43217.html)  concerning fee paid judges in the Judicial Pension Scheme. The judgment held that remedy could extend back before the Part-time Workers Directive was required to be implemented on 7 April 2000.

On 9 March 2022, after an extended period of negotiations, a [Memorandum of Understanding (MoU)](https://www.fpsregs.org/images/RDS/RDS-Matthews-Memorandum-of-Understanding-9-March-2022.pdf) was agreed between the government, the Fire Brigades Union, the Fire & Rescue Services Association, and FRA employers.

It was confirmed that remedy for retained firefighters affected by the O’Brien judgment will be provided by way of a second options exercise allowing in-scope individuals the opportunity to purchase pension entitlement as a special member of the FPS 2006. More details on the scope and mechanics of the settlement are available in our [summary of "Matthews" MoU and second options exercise factsheet](https://www.fpsregs.org/images/RDS/Summary-of-Matthews-MoU-and-second-options-exercise.pdf).

The regulations to implement the second options exercise in England will be drafted by the Home Office and consulted on before they are laid before Parliament. The Home Office has a maximum period of 18 months to draft, consult, and introduce the necessary secondary legislation.

FRAs will be expected to start the second options exercise as soon as possible after the legislation comes into force. The exercise will run for a maximum period of 18 months.

Prior to the legislation coming into force, FRAs are advised to take steps to identify retained firefighters who were employed between the relevant dates and ascertain what steps were taken to identify and contact individuals who were eligible for the first options exercise. This will help FRAs determine whether the retained firefighter is in scope again this time around.

We have also asked FRAs to identify any retained firefighters who have transferred from retained to whole time employment and maybe subject to aggregation. For clarity, the individual must have been in retained employment at some point between 7 April 2000 and 5 April 2006 and they must have joined whole time employment without a break in, or overlap of, service. Once these individuals have been identified, and **no later than 31 May 2022**, FRAs should email [Bluelightpensions@local.gov.uk](mailto:Bluelightpensions@local.gov.uk) with the total number of members, split by scheme that the firefighter joined in respect of their whole time employment, for example, FPS 1992 = 3, FPS 2006 = 5.

**Member communications post 1 April 2022**

On 8 March 2022, the [FPS Coffee Morning was dedicated to the preparation for prospective remedy](https://www.fpsregs.org/images/Events/Coffee-mornings/Coffee-morning-8-March-2022-prospective-remedy.pdf). Attendees were reminded that all current members of the Firefighters’ Pension Schemes who remain active employees beyond 31 March 2022 do so as a member of FPS 2015. Full details on what action must be taken can also be found in [FPS Bulletin 54](https://www.fpsregs.org/images/Bulletins/Bulletin-54-February-2022/Bulletin-54.pdf)  – February 2022.

It was agreed that, in addition to distributing the [protected member letter](https://www.fpsregs.org/images/Age-discrimination/Protected-member-letter-1-April-2022.docx) in advance of 1 April 2022, FRAs should contact all protected members once the transition into FPS 2015 has taken place; this is to ensure that members become familiar with some key features of the scheme. To help FRAs with this we have provided a [protected member communication post-April 2022](https://www.fpsregs.org/images/Age-discrimination/Protected-member-comms-post-April-2022.pdf)  that can be used. It is strongly advised that FRAs send this communication to all former protected active members as soon as possible.

**Contingent decisions – Optant outs**

On 25 March 2022, we shared a communication with relevant stakeholders on contingent decisions, more specifically on the area of optant outs. The communication confirmed that, due to the pension changes in 2015 and the subsequent introduction of FPS 2015, some firefighters chose to opt out of the pension scheme rather than transition into FPS 2015. The government has recognised in its [Public Service Pensions consultation response](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/958635/Public_Sector_Pensions_Consultation_Response.pdf) that some members would have taken a different course of action had they known that continued membership of their legacy scheme (FPS 1992, FPS 2006 including special members) during the remedy period was an option. The government therefore intends to legislate for decisions such as this through the contingent decision aspect of the retrospective legislation. This is confirmed in [section 5 of the PSPJOA](https://www.legislation.gov.uk/ukpga/2022/7/section/5/enacted) .

Although the final policy on this matter is yet to be determined and we cannot provide any guarantees that a particular case will be deemed a contingent decision, we thought it would be prudent to bring the matter to FRAs’ attention so that action can be taken where required.

It is our understanding that contingent decisions only cover the remedy period (1 April 2015 to 31 March 2022). This means that should a member remain opted out beyond 1 April 2022 they may, under retrospective legislation, be given the option to buy back their opted-out service which occurred during the remedy period. However, it is unlikely that regulations will permit them to buy back service after 31 March 2022. This could therefore mean that their pension would remain deferred with a payment age of 60 for FPS 1992 and 65 for FPS 2006 (special members have a deferred payment age of 60), regardless of whether they buy back the opted-out service during the remedy period.

We understand that some members have indicated that they want to buy back their opted-out service for the remedy period, as they want to retire as an active member. If this is the case, members should speak with their pension/payroll department and arrange to be opted back into the FPS on or before 1 April 2022.

FRAs were strongly advised to communicate this message with staff. As expected, this communication generated a significant amount of interest from members, and we received many questions in respect of this. Unfortunately, as a final policy decision is yet to be determined, we cannot provide any more clarity on this matter. We understand that members have questions about whether the contingent decision provision captures them and their personal set of circumstances. We also understand that members want to understand the cost implications and what repayment options may look like. However, we cannot provide definitive further clarity at this time. We appreciate that this is frustrating for all concerned and give our assurance that more detail will be provided as and when it is available.

**Cost control valuation 2016 finalised**

Following HM Treasury's publication of Amending Directions in October 2021, the Home Office has finalised the 2016 valuations for the FPS providing certainty on the outcome to scheme members.

On 16 March 2022, the [final outcome of the cost-control element of the 2016 valuation](https://www.fpsregs.org/images/Valuation/FPS-England-cost-cap-valuation-2016-final-report.pdf) for the FPS in England was published, confirming a breach to the cost cap ceiling of 14.6%.

This process had previously been paused following the uncertainty arising from the McCloud and Sargeant judgments and was ‘un-paused’ in 2020.

The report confirms that the cost control element 2016 valuation is not used to set the employer contribution rate and changes to the employer contribution rates resulting from the 2020 valuations will take effect from April 2024.

In 2021, the government [announced proposed reforms to the Cost Control Mechanism](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1022938/CCM_RESPONSE.pdf) which will be implemented in time for the 2020 valuations. These reforms do not affect the 2016 valuations as the government previously decided that it would be inappropriate to reduce member benefits based on a mechanism that may not be working as intended.

The government therefore announced that any ceiling breaches found when schemes complete the 2016 valuations will be waived. This means that no member will face a reduction in their benefits as a result of the 2016 valuation.

We reported in November that unions across the public sector had launched a judicial review against the government about including McCloud/ Sargeant remedy costs in the cost control mechanism. The provisional results of the 2016 cost cap valuation showed that all public service schemes were cheaper than expected. This would have led to a reduction in contributions or improvements in benefits from April 2019 had the cost control process not been paused.

[The Home Office has published a set of FAQs](https://www.fpsregs.org/images/Age-discrimination/HO-FPS-prospective-remedy-consultation-response-comms-briefing-pack.pdf) on the valuation results to assist stakeholders.

**FPS England SAB updates**

**HMT respond to the SAB on immediate detriment**

We reported in  [FPS Bulletin 52](https://www.fpsregs.org/images/Bulletins/Bulletin-52-December-2021/Bulletin-52.pdf) that the chair of the SAB had written an [open letter to HMT on the withdrawal of the Home Office informal guidance](https://www.fpsboard.org/images/PDF/Boarddocs/Remedy/FPS-SAB-letter-to-HMT-re-withdrawal-of-ID-guidance-17-December-2021.pdf) on immediate detriment. The letter, dated 17 December 2021, asked for more information on the risks and uncertainties which HMT said arose as a result of processing cases ahead of legislation.

On 23 March 2022,  [HMT provided a response outlining the factors behind the withdrawal](https://www.fpsboard.org/images/PDF/Correspondence/HMT-response-to-SAB-on-immediate-detriment-23-March-2022.pdf) in more detail. The response highlights that Section 61 of the Equality Act 2010 does not, in HMT’s opinion, allow for amendment of a member’s tax position. The response details several tax complexities which have been identified and will be dealt with through legislation.

The SAB acknowledges the response, which has been shared with the LGA and the FBU as parties to the Memorandum of Understanding/Immediate Detriment Framework

**Other News and Updates**

**PSPJOA 2022 receives Royal Assent**

The Public Service Pensions and Judicial Offices Bill received Royal Assent on 10 March 2022 and became the [Public Service Pensions and Judicial Offices Act 2022](https://www.legislation.gov.uk/ukpga/2022/7/enacted)  (PSPJOA 2022), which will come into force on 1 April 2022.

The PSPJOA 2022 legislates for how the government will remove the discrimination identified by the courts in the way that the 2015 reforms were introduced for some members.

The main elements of the Act are:

• Changes implemented across all the main public service pension schemes in response to the Court of Appeal judgment in the McCloud and Sargeant cases.

• Eligible members of the main unfunded pension schemes have a choice of the benefits they wish to take for the “remedy period” of April 2015 to 31 March 2022.

• From 1 April 2022, when the remedy period ends, all those in service in main unfunded schemes will be members of the reformed pension schemes, ensuring equal treatment from that point on.

• Bespoke measures implement corresponding changes in the Judicial Pension Schemes and Local Government Pension Scheme to reflect their different arrangements.

• Ensures there are no reductions to member benefits as a result of the 2016 cost control valuations.

These changes provide public service workers with greater certainty of their benefit entitlements. Going forwards, public servants will receive guaranteed pension benefits, but on a fairer basis, and in a way that ensures that they are affordable and sustainable into the future.

**DWP consultation on pensions dashboards**

On 11 March 2022, the LGA and SAB submitted their responses to the Department for Work and Pensions (DWP) [consultation on the draft Pensions Dashboards Regulations 2022](https://www.gov.uk/government/consultations/pensions-dashboards-consultation-on-the-draft-pensions-dashboards-regulations-2022) in respect of the Firefighters' Pension Schemes.

Pensions Dashboards will allow individuals to see information about all their pensions, including the State Pension, in one place. These draft regulations set the requirements to be met to deliver this and will place a legal duty on pension providers to provide information to the dashboards. The consultation proposes a staging deadline of the end of April 2024 for public service pension schemes, including the Firefighters’ Pension Scheme. This means that Fire scheme administrators will need to be able to connect to the digital architecture by this date and be ready to provide individuals’ data to them via the dashboards.

While the LGA and SAB are supportive of dashboards and their purpose, there are strong concerns over the proposed staging schedule given the conflicting pressures faced by administrators and the data that will be available at that time. The [LGA response to the DWP consultation](https://www.fpsregs.org/images/Consultations/DWP-consultation-draft-Pensions-Dashboard-Regulations-LGA-response-11-March-2022.pdf) and the [SAB response to the DWP consultation](https://www.fpsboard.org/images/PDF/Consultations/DWP-consultation-draft-Pensions-Dashboard-Regulations-FPS-SABE-SABW-response-11-March-2022.pdf) both therefore ask for the staging date to be delayed a further 12 months until April 2025

**2. Member Issues**

None

**3. Administration Update**

**Hot Topics**

To help keep you up to date with the latest scheme and administration news make sure you follow our client blog, Hot Topics at:

[www.wypfpensionmattersfire.wordpress.com/](https://wypfpensionmattersfire.wordpress.com/)

To follow the blog, click follow and put in your work email address. You’ll then be notified every time we add something to it.

**ID / MoU questionnaire**

Earlier this year we emailed all FRA clients with the ID/MOU questionnaire, thank you to all those that have replied. However, many clients haven’t, and can I urge all those that haven’t to please complete the questionnaire and return it to WYPF no later than **30 April.**

This information is extremely important to the success of your schemes administration.  You may recall that the request included a spreadsheet questionnaire that asked what your FRA has decided to do for ID and under which provision.  Of course, if your opinion has now changed since submitting your completed questionnaire please advise WYPF of that as well.

**Matthews**

To reiterate the LGA message, please ensure you reply to LGA regarding the number of aggregation cases that apply to your FRA.  WYPF have received a couple of queries from clients regarding this matter, however, it is the responsibility of the FRA to provide this information. Furthermore, as the qualification criteria is contractual, rather than pensionable, WYPF does not hold this information.

Please note, that the LGA has already recommended the FRAs should start work now identifying the population of individuals who will be in scope for the second options exercise.  Doing this work now will enable FRAs to thoroughly prepare their data in time for consultations and regulations.

**Preparing for year-end**

As we are now past March FRAs should be progressing well with the month 12 file.  Please remember, month 12 postings are key to important statutory duties undertaken by WYPF (such as annual benefit statements and pension saving statements).  WYPF will provide more detail on this year’s benefit statement in a future report.

**Discretions**

Does your FRA have a comprehensive suite of discretions for each of the schemes?  WYPF website contains client discretions where we’ve been given them…and for many clients WYPF have not yet received a copy. If you have completed your discretions, please email WYPF and we will publish them on our website.

If you do not have any discretions can I remind every FRA it is the responsibility of the Scheme Manager of each FRA to draft, maintain and publish their discretions.  It’s quite a large undertaking if you don’t have a policy on discretions (or you just have a 2015 discretions policy containing the 3-4 areas requested by LGA back in 2015!). However, an FRA without discretions is not fulfilling their statutory obligations under the scheme regulations and expose themselves to an increased risk of error in benefit values, complaints and sanction by the Pension Ombudsman. The scheme is currently going through a period of amendment due to the McCloud Remedy and now is an ideal time to address scheme discretions

Further information including discretions templates can be found on [FPS Regulations website in the ‘Administration Resources’ and then ‘Guides and sample documents’](https://fpsregs.org/index.php/administration-resources/guides-and-sample-documents) area.

**McCloud Costs**

We have previously reported on the potential software costs for McCloud and how that would be charged to your Fire Authority. WYPF will not now be looking to charge separately for this, instead the costs for our FRAs will be based on the total clients Fire service and will be recovered over a 5 year period through the normal cost per member administration charge.  This will be capped at £18 per member to ensure there are no big increases for you.

1. **Key Performance Indicators**

Completed processes

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Nottinghamshire Fire (1 to 31 March 2022) | | | | | |  |
| **Work Type** | **Total Cases** | **Target days for each case** | **Target met cases** | **Minimum Target Met** | **Target met percent** | **Average time taken** |
| Transfer In Quote | 1 | 10 | 1 | 85 | 100 | 1 |
| Transfer In Actual | 1 | 10 | 1 | 85 | 100 | 10 |
| Pension Estimate | 4 | 10 | 3 | 85 | 75 | 9 |
| Pension Set U/Payment of Lump Sum | 5 | 3 | 5 | 85 | 100 | 1 |
| Retirement Actual | 5 | 10 | 5 | 85 | 100 | 1 |
| Change of Address | 4 | 20 | 4 | 85 | 100 | 1 |
| Age 55 Increase to Pension | 1 | 20 | 1 | 85 | 100 | 20 |
| Enquiry Fire | 1 | 10 | 1 | 85 | 100 | 1 |
| Death Grant Nomination Form Received | 1 | 20 | 0 | 85 | 0 | 39 |
| Spouse Potential | 1 | 20 | 1 | 85 | 100 | 10 |
| Death Grant to Set Up | 1 | 5 | 0 | 85 | 0 | 6 |
| Initial letter Death in Retirement | 3 | 5 | 3 | 85 | 100 | 2 |
| Death in Retirement | 3 | 5 | 3 | 85 | 100 | 1.67 |
| Update Member Details | 7 | 20 | 7 | 100 | 100 | 1 |

1. **Work in Progress**
2. **Member Web Registrations**

The number of members signed up to member web are:

|  |  |
| --- | --- |
| Status | Number |
| Active | 353 |
| Pensioner | 71 |
| Pensioner Ex-Spouse | 0 |
| Beneficiary Pensioner | 0 |
| Deferred Ex-Spouse | 0 |
| Deferred | 105 |

1. **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 |
| Roll out of Monthly Postings  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 |

1. **Membership Numbers**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Scheme Name** | **Active Members** | **Deferred Members** | **Pensioners** | **Beneficiaries** | **Preserved Refund** | **Leavers Options Pending** |
| Nottinghamshire (1992 Scheme) | 21 | 47 | 716 | 118 | 1 | 0 |
| Nottinghamshire (2006 Scheme) | 4 | 159 | 28 | 9 | 6 | 0 |
| Nottinghamshire (2015 Scheme) | 581 | 169 | 12 | 1 | 0 | 0 |

1. **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** |

**10. 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 |