

## **Breach Assessment Reporting Form**

<b>Date of Assessment:</b>	12 <sup>th</sup> May 2025
<b>Introduction:</b> Brief introduction to the Breach being assessed	The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 require pension schemes to provide members with an Annual Benefit Statement (ABS) each year outlining their pension benefits. In the Firefighters' Pension Scheme the statutory deadline to provide an ABS is 31 August. As part of the implementation of the McCloud remedy, the statutory deadline for members to receive their first Remediable Service Statement is 31 March 2025.
<b>Identified:</b> How the breach was identified, eg tracked from agenda, LGA , Scheme Manager, Pension Administrator	Tracked through regular contract management with pension administrator (XPS).  A final report detailing the members that had not been issued with an RSS was received by CFA on 8 April 2025.

Assessment:				
(Using the TPR guidance comment on the four areas and score red, amber and green)				
	Cause	Effect	Reaction	Wider Implications
Red				
Amber	Data quality concerns have resulted in us not meeting the statutory deadline of 31 <sup>st</sup> March 2025 for issuance of RSS for all in scope members.	<p>43 members did not receive an RSS by the statutory deadline and therefore do not have accurate information about their pension entitlements.</p> <p>This equates to 12.2% of in scope members.</p> <p>This has resulted in a risk of financial uncertainty for members that could impact on their financial planning and retirement decisions as well as a potential for erosion of member trust and confidence which could lead to dissatisfaction and submission of IDRP.</p>	<p>There was a legitimate reason for why 4 of these members did not receive an RSS, these members have been written to advise of delay due to waiting for HO guidance on how to process PSO debits. Scheme Manager has exercised their discretion under Section 29(10B) to extend the deadline for these members.</p> <p>All data quality queries have been responded to, and all updated data has been provided to XPS.</p> <p>Communication has been sent to all affected members to advise them of the delay whilst work continues to process the outstanding RSS by XPS.</p>	It is unlikely that there are wider scheme issues and that the scheme is in breach of other legal requirements. All members approaching retirement have benefits calculated correctly and paid on time.
Green				
<b>Action:</b> (enter text about what the course of action is in response to the breach, including any timescales)  XPS are now in receipt of responses to all outstanding data queries and are processing weekly runs to issue the outstanding backlog of RSS.				

<b>History / Frequency:</b>  Late publication of annual Benefit statements did occur last year (31/08/24) due to the complexities of the remedy but has not happened previously.
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**Decision**

<b>Report as material breach</b>	
<b>Recorded as breach</b>	
<b>Assessed by:</b>	Michelle Richardson
<b>Date of Assessment:</b>	12/05/2025

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**Board Review:**

<b>Tabled at Board Meeting:</b>
<b>Agreed by Board:</b>