

LOCAL **P**ENSION **B**OARD



FIREFIGHTER PENSION SCHEMES BOARD MEETING 4 FEBRUARY 2026 – 2.00PM

**TRAINING & ADMINISTRATION HUB, ENDEAVOUR HOUSE,
QUEENS MEADOW BUSINESS PARK, HARTLEPOOL, TS25 5TH**

MEMBERS OF THE CFA LOCAL PENSION BOARD FIREFIGHTER PENSION SCHEMES

Employer Representative:	Councillor John Kabuye - Chair
Employer Representative:	Councillor David Coupe
Employer Representative:	Councillor Mick Stoker
Employee Representative:	Mr James Sudron
Employee Representative:	Mr Sid Walker
Employee Representative:	Mr Alan Turner

In Attendance:-	Scheme Manager	Peter Rickard
	Brigade Pensions Advisor	Michelle Richardson
	XPS Business Services	Sharon Potter, Graeme Hall
	Employer Substitute	Councillor Dennis McCabe
	Employee Substitute	TBC

A G E N D A

- 1. APOLOGIES FOR ABSENCE**
- 2. DECLARATION OF INTERESTS**
- 3. TO CONFIRM THE MINUTES OF 5 NOVEMBER 2025**

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**FIREFIGHTER PENSION SCHEMES
BOARD MEETING
4 FEBRUARY 2026 – 2.00PM**

- 2 -

A G E N D A

4. SCHEME MANAGERS REPORT TO THE BOARD

- Governance and Administration
- Scrutiny
- Risk
- Age Discrimination Remedy (Sargeant/McCloud)
- Part-Time Worker Discrimination Remedy (Matthews)
- Pensions Dashboard
- Training

5. PERFORMANCE

- XPS Update – to be tabled

6. COMMUNICATIONS AND BULLETINS

- FPS Bulletins and Action Log

7. ANY OTHER BUSINESS

Date of Next Meeting – 6 May 2026

OFFICIAL



FIREFIGHTER PENSION SCHEMES MINUTES OF BOARD MEETING 5 NOVEMBER 2025 – 2.00PM

PRESENT:	EMPLOYER REPRESENTATIVES Councillor David Coupe (Chair) Councillor Dennis McCabe EMPLOYEE REPRESENTATIVES James Sudron Sid Walker Nick Cain (Sub)
IN ATTENDANCE:	Peter Rickard - Scheme Manager Kristine Ward - ACFO - DSPPR Michelle Richardson - Brigade Pensions Advisor Louise Tindall - Governance Sharon Potter - XPS Business Services
APOLOGIES FOR ABSENCE	Councillor John Kabuye - Chair Councillor Mick Stoker Alan Turner - Vice Chair Graeme Hall - XPS Business Services

1. APPOINTMENT OF CHAIR

In the absence of both the Chair and Vice Chair the Board was asked to appoint a Chair for the meeting. Cllr Coupe was subsequently nominated and appointed.

RESOLVED – That Councillor Coupe be appointed as Chair for this meeting.

2. DECLARATION OF MEMBERS INTERESTS

There were no declarations of interest made.

3. MINUTES

RESOLVED – that the Minutes of the Local Pension Board Meeting on 14 August 2024 be confirmed.

4. SCHEME MANAGERS' REPORT TO THE BOARD

The Scheme Manager (SM) provided the Board with the following updates:

- Governance and Administration
 - Ill Health – one member has been retired on ill health and another currently going through IQMP assessment.
 - Appeals – none
 - IDRP - none
- Scrutiny
 - Breaches of the Law – failure to issue all Annual Benefit Statements (ABS) by 31 August 2025 resulted in a breach, as detailed at Appendix 1.
 - Cyber Security – no reported breaches
 - Compliance – Cyber Essentials Plus (CE+) accredited
 - Audit - none
- Risk – the Board noted the additional risk on the register relating to training detailed at Appendix 2.
- Deferred Choice (DC) – RSS Issuance - noted.
- Immediate Choice (IC) – RSS Issuance - noted that 4 are outstanding.
- Contingent Decisions – 9 received to date all relating to opt-outs. SM will consider.
- Matthews Remedy – 74 cases to process
- Pensions Dashboard – XPS undertook this project and confirmed that the 31 October 2025 deadline was achieved.
- Training - noted upcoming training dates for consideration.

RESOLVED - That the Scheme Manager's Report be noted.

5. PERFORMANCE

5.1 XPS Performance Delivery Report Q2 – ending 30 September 2025

The Board considered the Performance Delivery Report for 1 April – 30 September 2025 which covered:

XPS Projects Updates

- McCloud & Annual Benefit Statements
- 2024 RSS Production - Data as at 31 March 2025
- 2025 RSS Production - Data as at 30 September 2025
- Matthews Project Update
 - 40 Members identified
 - 36 Members Actioned on Payroll
 - 4 Outstanding / Not made a choice

Sharon Potter (SP) thanked Michelle Richards (MR) for her ongoing support with the projects and gave the Board assurances that the Brigade was in an exceptional position.

- Pensions Dashboard Update – XPS confirmed this met the connection date target of 31 October 2025.

5. PERFORMANCE

5.1 XPS Performance Delivery Report Q2 – ending 30 September 2025 cont.

Service Delivery Headlines

- Administration Team – 99% KPI achieved. Aurora Testing and Preparation underway.
- Scheme Events Team – Annual Production of ABS/RSS/PSS
- Admin Projects Team – Matthews / McCloud
- Member Connect Team – 52,579 emails and 15,379 incoming calls received.

Member Engagement

- New mypension website – out of CFBs 371 active Members 245 are registered and 126 not registered (66.04% uptake)
- XPS Member Connect

Service Level Reports

- Service Levels for Q2 were 99% (Cases were 77%)

SP informed the Board that XPS had a partnership fund of £100k to allocate to police and fire sponsorship or charitable events and asked the Board to email any suggestions direct.

RESOLVED – That the report be noted.

6. COMMUNICATIONS AND BULLETINS

MR presented the actions from FPS Bulletin 95 and provided an update on progress.

MR confirmed that Comms relating to the ABS had been shared with staff via email and FireWire to encourage staff to register for member self- service.

RESOLVED – that the FPS Bulletin Log be noted.

7. ANY OTHER BUSINESS

There were no additional items for discussion.

**COUNCILLOR DAVID COUPE
ACTING CHAIR**

LOCAL PENSION BOARD

FIREFIGHTER PENSION SCHEMES



DATE: 4 FEBRUARY 2026

TITLE: SCHEME MANAGER UPDATE

REPORT OF: SCHEME MANAGER

For Approval and Noting

1. PURPOSE

- 1.1 To inform and update the Board.

2. UPDATE TO THE BOARD

2.1 Governance and Administration

For Noting

- **Discretions Applied** – none
- **Ill Health** – Two members were referred to the IQMP for assessment of eligibility for early payment of benefits due to ill health:
 - On-Call Firefighter PW was assessed and determined to be eligible for ill-health retirement and was consequently retired early on 17th October 2025 under the relevant provisions.
 - Wholetime Firefighter VH was assessed and found not eligible for ill-health retirement. As a result, the Capability process has been initiated in accordance with CFA's policy.
- **Appeals** – none
- **IDRP** – none
- **Annual Benefit Statements (ABS)** – The statutory deadline for issuing ABS was 31st August 2025 and as we did not manage to issue all statements by this date a breach was reported to the Pensions Regulator. There still remains 44 members (8%) who have yet to receive their Annual Benefits Statement (35 deferred and 9 active). Work is ongoing with XPS to ensure that these are issued as soon as possible.
- **Annual Scheme Returns** – On 3rd December 2025, XPS successfully submitted the annual returns to the Pensions Regulator on behalf of CFA. This submission ensures compliance with statutory reporting requirements and confirms that all relevant pension scheme data for the reporting

period has been accurately provided. The process was completed within the regulatory deadline, mitigating any risk of penalties or non-compliance.

Supporting documentation and confirmation of submission are included in **Appendix 1** for reference.

- **Scheme Advisory Board (SAB) Annual Level** – The SAB has published the levy details for 2025/2026 (see **Appendix 2**). The levy is set at £11.56 per active Firefighter member, resulting in a total of £4,288.76 for the CFA. A purchase order was raised on 28th November 2025 and submitted to the LGA for invoicing.
- **Public Sector Pension Scheme Governance & Administration survey 2025-26** – The annual survey has been issued by the Pensions Regulator (TPR) and responses will help them to determine how schemes are progressing on meeting the expected standards so it can focus on areas where they may need more support. When the survey was last conducted in 2023, 94% of all public service pension schemes completed it and this helped TPR build a comprehensive picture of governance and administration standards. TPR is hoping that **all** public service pension schemes participate in this year's research.

CFA's survey responses have been drafted on behalf of the scheme manager by the Authorities Technical Advisor and are attached at **Appendix 3** for consideration by the Board before submission. Deadline for submission is 13th February 2026.

2.2 Scrutiny

For Noting

- **Breaches of the Law** – none
- **Cyber Security** – there have been no reported breaches
- **Compliance** - Cyber Essentials Plus (CE+) accredited
- **Audit** – none

2.3 Risk

For Noting

The Board has a responsibility to take an active role in monitoring the key risks on a regular basis and driving forward improvement.

The risk register (**Appendix 4**) was reviewed by the service's internal Pensions Management Team on 14th January 2026, and it was agreed that the following changes would be made:

- Risk ID 3 – Failure to issue ABS by statutory deadline, we did not issue all statements in 2025, and this was reported to the Pensions Regulator. The risk rating was increased last quarter to reflect this. As the issue has now been addressed, it was agreed that the risk level would be reduced to its original score.

- Risk ID 27 – Failure to connect to dashboards ecosystem by the staging date, this milestone has now been achieved, and therefore it was agreed that this risk be removed from the register.

2.4 Age Discrimination Remedy (Sargeant/McCloud) – Update For Noting

Deferred Choice (DC) – RSS Issuance

We still have 14 members who have yet to be issued with an RSS, XPS have continued to work on these cases to resolve any data and/or calculation issues/complexities.

Immediate Choice (IC)-RSS Issuance

All statements within our control were issued to IC members ahead of the statutory deadline of 31st March 2025.

However there remains to be 4 outstanding cases, all of whom have Pension Sharing Order debits, for which further guidance is needed before processing.

XPS advised that the guidance was likely to be in place during Q3 of 2025/26, at which point they can process the outstanding cases. However, we still await their interpretation of the guidance so that cases can be progressed.

Contingent Decisions

To date CFA has received 9 applications for Contingent Decision, all relate to opt outs. These now need to be considered by the Scheme Manager

CFA have agreed to the proposal submitted by XPS for carrying out this piece of work, which will commence once the decision has been made by the Scheme Manager on whether to accept the applications.

LGA guidance on processing these cases was withdrawn pending receipt of clarification from the Home Office on what constitutes a legacy scheme for the purposes of contingent decisions; therefore, cases are currently on hold pending receipt of this clarification. These will be assessed and processed as soon as further guidance is received.

The region has been consulted on their approaches, and all parties have confirmed they are deferring processing these cases until the updated guidance is received.

2.5 Part Time Worker Discrimination Remedy (Matthews) - Update For Noting

CFA have received two additional cases bringing the total to 76. Of these:

- one case involved a member who provided evidence showing that, although eligible under Matthews 1, they had not been properly informed of their entitlements

- the other was one we had previously been unable to contact.

The current case numbers are as detailed below:

Category	No. Cases	No. issued	No. Complete
Deceased	5	0	0
Pensioner	41	40	39
Deferred Not immediate / imminent	27	27	19
Active	3	3	2

To date CFA have issued statements to all deferred and active members and continue to work through the remaining pensioner case with has been referred to GAD due to complexities around a pension sharing order. We await further LGA guidance on the outcome of the Home Office Consultation before we can make further progress on the deceased cases.

The Home Office have been consulting on further changes to the regulations, and the consultation response was received on 5th December 2025. The LGA expect the regulations to support these changes to come into force by 1st April 2026 and in the interim encourage FRAs:

- Continue to process the cases currently covered by the existing legislation.
- Actively identify those individuals who will be brought into scope by the amendments.
- Prepare their cases for processing once the regulations take effect.

Work has commenced to prepare for the implementation whilst we await updated guidance from the LGA.

2.6 **Pensions Dashboards**

For Noting

On 31st October 2025, XPS successfully connected CFA's pension schemes to the Pensions Dashboards Central Data Architecture, in full compliance with the prescribed connection timetable. This milestone ensures that scheme data can be accessed securely through the national dashboard infrastructure, supporting transparency and member engagement.

The Connection Certificate and Approaches Document are provided in **Appendix 5** for reference.

2.7 Training

For Noting

The Board has an obligation to ensure Members receive adequate training and knowledge to support them in their role.

The LPB's Technical Advisor attended the Refresher Training on 8th December 2025.

The LGA are facilitating LPB training sessions as detailed below, and members are encouraged to attend:

Full training

From May 2026, in a response to feedback received, the LGA will be splitting the full training over two half days. It is expected that attendees register for both half day sessions:

May 2026:

- Day One: [5 May 2026 10:00 - 12:00 \(MS Teams\)](#)
- Day Two: [7 May 2026 12:30 - 14:30 \(MS Teams\)](#)

January 2027:

- Day One: [28 January 2027 10:00 - 12:00 \(MS Teams\)](#)
- Day Two: [29 January 2027 12:30 - 14:30 \(MS Teams\)](#)

Refresher training

- [31 March 2026 10:00 - 12:00 \(MS Teams\)](#)
- [7 July 2026 12:30 - 14:30 \(MS Teams\)](#)
- [8 October 2026 10:00 - 12:00 \(MS Teams\)](#)

PETER RICKARD
SCHEME MANAGER

Richardson, Michelle

From: Paul Mudd <paul.mudd@xpsgroup.com>
Sent: 03 December 2025 17:47
To: Younger, Lyn
Cc: Richardson, Michelle; Sharon Potter
Subject: RE: The Pensions Regulator - Scheme Returns 2025

Follow Up Flag: Follow up
Flag Status: Completed

[WARNING] This e-mail originated from outside of Cleveland Fire Brigade
DO NOT CLICK links or attachments unless you recognise the sender and know the content is safe.

Hi Lyn & Michelle,

Please find below 'receipts' from the Pensions regulator to confirm that your Scheme returns for 2025 have been submitted:

**The Pensions
Regulator**

[My Profile](#) | [What's available](#) | [FAQs](#) | [Contact us](#) | [T&Cs](#) | [Logout](#)


Exchange - Scheme maintenance

Main options

My schemes

Firefighters Pension Scheme - Cleveland 1992 **PSR: 10271423**

Scheme return complete

 **Select here to print the scheme return**

You successfully submitted your scheme return to the Pensions Regulator on 03/12/2025.

Thank you for your time and co-operation.

Important information: Please read.

The manager of the scheme is responsible for informing the Pensions Regulator of any changes to the scheme information.

Please let us know of any changes, for example:

- changes to the name and/or address of the scheme;
- change of employer;
- change to the scheme's status; or
- change to the number of scheme members.

You can now access this online scheme maintenance system at any time, enabling you to update your scheme information with changes as and when they happen.

[Main options](#)
[My schemes](#)
Firefighters Pension Scheme - Cleveland 2006
PSR: 10276797

Scheme return complete



[Select here to print the scheme return](#)

You successfully submitted your scheme return to the Pensions Regulator on 03/12/2025.

Thank you for your time and co-operation.

Important information: Please read.

The manager of the scheme is responsible for informing the Pensions Regulator of any changes to the scheme information.

Please let us know of any changes, for example:

- changes to the name and/or address of the scheme;
- change of employer;
- change to the scheme's status; or
- change to the number of scheme members.

You can now access this online scheme maintenance system at any time, enabling you to update your scheme information with changes as and when they happen.

[Main options](#)
[My schemes](#)
Firefighters Pension Scheme - Cleveland 2015 (CARE)
PSR: 10276673

Scheme return complete



[Select here to print the scheme return](#)

You successfully submitted your scheme return to the Pensions Regulator on 03/12/2025.

Thank you for your time and co-operation.

Important information: Please read.

The manager of the scheme is responsible for informing the Pensions Regulator of any changes to the scheme information.

Please let us know of any changes, for example:

- changes to the name and/or address of the scheme;
- change of employer;
- change to the scheme's status; or
- change to the number of scheme members.

You can now access this online scheme maintenance system at any time, enabling you to update your scheme information with changes as and when they happen.

Thank you for your help with this matter- have a great evening.

Firefighters' Pensions

From: the LGA	To: FRAs - England
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Budget for the Firefighters' Pension Scheme 2025/2026

Summary

1. This paper sets out the detail of the Firefighters' Pension Scheme (FPS) levy to be paid by English Fire and Rescue Authorities (FRAs) for the year 2025/2026. The levy is comprised of the following two elements:
 - 1.1. The LGA employer levy: in 2014, FRAs entered into a shared arrangement to fund a technical adviser post to support their understanding and management of the FPS.
 - 1.2. Under the Firefighters' Pension Scheme 2014 Regulations [4H\(1\)](#)¹, the Firefighters' Pensions (England) Scheme Advisory Board (SAB) is required to set an annual budget for approval by the Secretary of State.
2. The minister has now approved the SAB levy of £8.35 per active firefighter to be defrayed to FRAs.
3. **A total of £11.56 per active firefighter will be levied on English Fire and Rescue Authorities (FRAs) to pay for both the work of the SAB and the LGA. This includes the SAB levy of £8.35 and the FRA LGA levy of £3.21.**
4. This amount distributed across FRAs based on active eligible membership numbers will be invoiced across December 2025. This process will be managed by LGA.
5. The previous levies have been set as below.

2017/2018	£5.67
2018/2019	£7.69
2019/2020	£6.67
2020/2021	£8.29
2021/2022	£9.16
2022/2023	£6.27
2023/2024	£9.24
2024/2025	£10.49

6. An update on budget spend will be provided to the Home Office at the next budget submission (2025/2026).

2025/2026 levy

7. The 2025/2026 levy is set at £11.56 per active firefighter member.

¹ 4H.—(1) The Firefighters' Pension Scheme Advisory Board must prepare an annual budget for approval by the Secretary of State

Firefighters' Pensions

8. This is calculated in two parts as set out below. More detail is available in [Appendix A](#).

Project	Total levy	Total number of FFs	Per head
SAB levy	£279,032.76	33,422 (England)	£8.35
LGA employer levy	£149,103.93	46,455 (UK)	£3.21
	£431,247.69		£11.56

9. The proposed expenditure is higher than for 2025/2026 for six main reasons:

9.1 The proportion of the shared costs have increased due to the approval of a Programme Support Officer role recruitment, the funding for this from 2025/2026 onwards was approved by the Fire Service Management Committee at their meeting on 11 December 2024.

9.2 Due to the ongoing pressures of the Sargeant/McCloud and Matthews remedy there is a requirement to keep the budget for communications and projects at a significant level, as additional support maybe required to assist with keeping these on track. It is noted that this is budgeted to be lower than in 2024/2025.

9.3 In addition to point b above, a contingency has been included within the communications and projects budget to consider the relevant work we will need to understand to complete our 'Need for Change project' to assess and implement the support provided to the sector by the LGA Firefighters' Pensions Team.

9.4. In addition to points b and c above, we have also included a contingency to support FRAs in communications and project budget on the movement in the aggregation litigation claim, which we had anticipated in 2025/2026.

9.5. Due to the forthcoming changes to the employee contribution rates and bandings and 2024 valuation assumptions it is sensible to keep the actuarial budget relatively high as the SAB will be utilising their services to support MHCLG and GAD with the final policy position.

9.6. A substantial increase in the website development/maintenance budget amount is due to the necessary work, to develop a new FPS member website and ensure that it receives an accessibility accreditation.

10. The Welsh FRAs have previously agreed to pay an additional levy of £1 per firefighter to contribute towards elements of the SAB costs such as specific SAB resources and legal advice; this has been included as income to reduce the shortfall to be recovered.

Firefighters' Pensions

	2024/2025	2025/2026
Total proposed budget expenditure	£303,834.50	£370,452.00
Income	£ 59,432.29	£ 91,419.24
Shortfall for levy	£244,402.21	£279,032.76

Value for money

11. The SAB is committed to setting a budget that represents value for money and represents the SAB workplan to support FRAs with their pension responsibilities.
12. The [Aon review in 2019](#) [Appendix 1] established the scheme administration cost per member at £120.33. The combined levy amount of £11.56 therefore represents 9.6% of the total FRA cost of managing and administering the FPS.
13. The SAB regularly take the opportunity to receive feedback from FRAs on the resources and information available to them.

LGA Bluelight team - November 2025

Proposed Budget – Detailed Summary

2025/2026 Scheme Advisory Board budget

Expenditure

Shared costs	£185,772.00
Board expenses	£ 7,000.00
Board costs	£177,680.00
Total Expenditure	£370,452.00

Income

Carry forward	£88,308.24
Wales (SAB)	£3,111.00
Total income	£91,419.24

Shortfall to be levied

	£279,032.76
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2025/2026 LGA employers budget

Expenditure

Shared costs	£185,772.00
Employer costs	£10,000.00
Total Expenditure	£195,772.00

Income

Carry forward	£46,668.07
Total Income	£46,668.07

Shortfall to be levied

	£149,103.93
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Shared costs

1. Since 2020/2021 the costs of employment expenses and events has been shared between SAB and FRAs at a 50/50 split. From this year onwards, the contingency budget has been added as a shared cost.

Firefighters' Pensions

2. Table 1 – Shared costs

Staffing inc. LGA overheads	£331,664.00
Associated staff costs	£17,880.00
Events	£10,000.00
Contingency	£12,000.00
Total Costs	£371,544.00
Divided by 50%	£185,772.00

Employment costs

1. The current structure of the Bluelight team is four full time posts: a Senior Adviser, two Advisers and a Programme Support Officer (PSO)
2. This structure has been in place since April 2025, following funding approval at the Fire Service Management Committee in December 2024. Prior to that the team was initially two full time Advisers, until budget approval was secured in 2021/2022 when a Senior Adviser commenced in post from September 2021.
3. The overhead charge levied by the LGA which has been set at a fixed rate for the fire team, at £40,000 has changed to a percentage of salary, which as a result has increased the overall amount, but works out to be less per person, now that the team has a headcount of four. This covers IT, HR, payroll, and corporate services and is set in line with LGA internal policies
4. Expenses incurred by LGA advisers cover attending meetings and events such as conferences, committee meetings, technical meetings, communication group meetings, regional meetings, and Local Pension Board (LPB) training. Expenses for 2025/2026 have increased to £8,000.
5. Associated staff costs include the subscription for regulatory software (Perspective) and staff development costs, such as attendance at training courses and conferences. The cost of Perspective has decreased in 2025/2026.

Events

6. The LGA team events are widely considered to be of excellent quality² and are greatly valued by our stakeholders. As attendance is not limited to English FRAs the cost of events is shared equally between the SAB and LGA budgets. Details of all past events are held on our [Events webpage](#).
7. The team delivered the popular two-day [FPS annual conference](#) which took place at Smith Square in September 2025. The cost estimated for this event was £4,854.60. To account for any overspend, the events budget has been set at £10,000.

² [Training survey 2019](#)

Firefighters' Pensions

8. We continue to deliver virtual engagement sessions to provide stakeholders with updates on topical pensions issues.
9. Pre-pandemic the budget for events was £18,000 which provided for seven events at an average per delegate cost of £44.26 per person.

Training

10. In January 2025, the LGA Firefighters' Pensions Team launched a training programme for FRAs, to acknowledge the deficit in knowledge and understanding across the fire pensions sector. These training sessions are chargeable to FRAs, as the need for each FRA will be different, and therefore it was not deemed appropriate to include the cost of these within either SAB or LGA levy.
11. Going forward the team will be able to include a prediction of training income into the budget, based upon the first year of training, and the proposed programme for future years.

Contingency

12. A contingency is added to the budget to allow for any increase in any of the above costs such as increased venue costs. Contingency has been moved to the shared costs as unexpected expenditure can equally affect both the Board and employers. Due to unanticipated legal costs arising for employers only in 2024/2025, the contingency budget has increased to £12,000.

Board expenses

13. As agreed in the 2016 budget and as per the [Terms of Reference](#), members of the Board should be able to claim travel expenses in order to attend meetings.
14. To fulfil statutory requirements and matters that the SAB has been asked to take forward by the Government, such as ensuring the effectiveness of LPBs and improving scheme administration, the Chair of the SAB needs to attend meetings and events around the UK.
15. This includes, but is not limited to, attendance at LPB training events, the FPS technical group and regional events.
16. As many of this year's meetings have continued virtually, a reduced budget for expenses has been retained at £7,000. The pre-pandemic budget was £12,000 and this will be reviewed again for 2026/2027.
17. We expect that most committee and regional meetings will remain virtual. At the September 2025 Board meeting however, it was agreed that going forward all full Board meetings will take place in person. This was proposed as the Chair and Secretariat hope that this will encourage improved communication, stronger relationships, increased focus and productivity, and the ability to address sensitive issues effectively.

Firefighters' Pensions

Income

18. As detailed, the Welsh FRAs have previously agreed to pay an additional levy of £1 per firefighter to contribute towards elements of the SAB costs such as specific SAB resources and legal advice; this has been included as income of £3,111 to reduce the shortfall to be recovered.
19. The SAB element of the levy is calculated by dividing £279,032.76 by the 2024/2025 return of 33,422 members in England at a cost of £8.35 per firefighter to be paid by FRAs in England.
20. The total employer levy after dividing £149,103.93 by the total number of firefighters in 2024/2025 (46,455) is a cost of £3.21 per firefighter to be paid by FRAs in England, Scotland, Wales, and Northern Ireland.
21. As already detailed, in January 2025 the pensions team launched a training programme, this will generate income towards the budget, however we have not been able to predict what level of income this will be, as this will vary, as it is the first year we have charged FRAs for topical training.
22. Income can vary from the forecasted income because the levy is forecast on the previous year actual numbers of firefighters.

Action

Please complete the MS form (see link below), including a valid purchase order number by 1 December 2025 to allow us to issue the invoice to your authority. Please ensure the PO is made out to the 'Improvement and Development Agency'.

<https://forms.office.com/e/N646Tcw8AC>

The Pensions Regulator

PSPS Governance and Administration Survey 2025-26

This document is intended to be used as a guide to help you gather the information required for the survey. Please note, however, that we need you to complete the questionnaire through the online survey link contained in your invitation email.

Thank you for taking the time to complete this survey. Please answer the questions in relation to the scheme referenced in your invitation email. Where the scheme is locally administered, we mean the sub-scheme or fund administered by the local scheme manager.

Your responses will be kept anonymous unless you consent otherwise at the end of the survey. Linking your scheme name to your answers will help inform The Pensions Regulator's (TPR's) engagement with you in the future

This survey should be completed by the scheme manager or by another party on behalf of the scheme manager. They should work with the pension board chair to complete it, and other parties (e.g. the administrator) where appropriate.

There is a space at the end of the survey to add comments about your answers where you feel this would be useful.

SECTION A – GOVERNANCE

The first set of questions is about how your pension board works in practice.

A1. EVERYONE TO ANSWER

Focusing on the scheme's pension board meetings in the last 12 months, please tell us the following:

Please write in the number for each of a-c below. Please include any board meetings that were held remotely (e.g. via teleconference or online meeting software)

- a) Number of board meetings that were scheduled
to take place (in the last 12 months)
- b) Number of board meetings that actually took
place (in the last 12 months)
- c) Number of board meetings that were attended
by the scheme manager or their representative
(in the last 12 months)

A2. ANSWER IF KNOW NUMBER OF BOARD MEETINGS THAT TOOK PLACE (A1b=0+)

Thinking about the number of pension board meetings that took place, was this more, the same or less than in the previous 12 month period?

Please select one answer only

- 1. More
- 2. Same
- 3. Less
- 4. Don't know

A3. EVERYONE TO ANSWER

Do the scheme manager and pension board have sufficient time to run the scheme properly?

Please select one answer only

- 1. Yes
- 2. No
- 3. Don't know

A4. EVERYONE TO ANSWER

Do the scheme manager and pension board have sufficient resources to run the scheme properly?

By resources we mean staffing, IT/systems and available budget.

Please select one answer only

- 1. Yes
- 2. No
- 3. Don't know

A5. EVERYONE TO ANSWER

Do the scheme manager and pension board have access to all the knowledge, understanding and skills necessary to properly run the scheme?

Please select one answer only

- 1. Yes
- 2. No
- 3. Don't know

A6. EVERYONE TO ANSWER

How often does the scheme manager or pension board carry out an evaluation of the knowledge, understanding and skills of the board as a whole in relation to running the scheme?

Please select one answer only

- 1. At least monthly
- 2. At least quarterly
- 3. At least every six months
- 4. At least annually
- 5. Less frequently
- 6. Never
- 7. Don't know

A7. EVERYONE TO ANSWER

Has the knowledge and understanding of the entire pension board been assessed against the expectations set for board members by TPR?

Please select one answer only

- 1. Yes
- 2. No
- 3. Don't know

A8. EVERYONE TO ANSWER

On average, how many hours of training per year does each pension board member have in relation to their role on the pension board?

We appreciate that this may differ for individual board members, but please provide your best estimate of the average hours.

Please write in the number below

..... hours per year

A9. EVERYONE TO ANSWER

Does the pension board believe that in the last 12 months it has had access to all the information about the operation of the scheme it has needed to fulfil its functions?

Please select one answer only

1. Yes
2. No
3. Don't know

A10. EVERYONE TO ANSWER

Does the scheme (or the sponsoring body) have a succession plan in place for the members of the pension board?

By this we mean a plan or process for how you will find, appoint and train suitable new members of the pension board to replace any existing board members who leave or retire.

Please select one answer only

1. Yes
2. No
3. Don't know

A11. EVERYONE TO ANSWER

To what extent do you agree or disagree with the following...?

<i>Please select one answer per row</i>	Strongly disagree	Tend to disagree	Neither agree nor disagree	Tend to agree	Strongly agree	Don't know
Pension board members have a good range of relevant experience	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The pension board is diverse in terms of protected characteristics such as age, gender, ethnicity and disability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The pension board has the right knowledge, skills and capabilities to deal with the advice and recommendations it needs to provide	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The pension board has a good mix of cognitive diversity (i.e. people with different ways of thinking, problem-solving and approaching decisions)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The chair drives and promotes equality, diversity and inclusion within the board	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

SECTION B – MANAGING RISKS

The next set of questions is about managing risks.

B1. EVERYONE TO ANSWER

Does your scheme have adequate processes for governing the following?

<i>Please select one answer per row</i>	Yes	No	Don't know	Not applicable
Conflicts of interest	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The knowledge and skills of pension board members	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identifying and reporting breaches of law	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Resolving contribution and payment issues	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LGPS SCHEMES ONLY: Assessing and managing investment risks to the scheme	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assessing and managing operational risks to the scheme	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring accuracy of scheme and member data	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring and managing the performance of advisers and service providers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LGPS SCHEMES ONLY: Monitoring scheme investments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The maintenance of IT systems and cyber controls	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring compliance with statutory disclosures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

B2. ANSWER IF HAVE ANY ADEQUATE PROCESSES (YES AT ANY B1 OPTION)**When were these processes last reviewed by the scheme manager or pension board?**

<i>Please select one answer per row (just for those selected at B1)</i>	In the last 12 months	More than 12 months ago but less than 3 years ago	More than 3 years ago	Never been reviewed	Don't know
Conflicts of interest	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The knowledge and skills of pension board members	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identifying and reporting breaches of law	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Resolving contribution and payment issues	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LGPS SCHEMES ONLY: Assessing and managing investment risks to the scheme	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assessing and managing operational risks to the scheme	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring accuracy of scheme and member data	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring and managing the performance of advisers and service providers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LGPS SCHEMES ONLY: Monitoring scheme investments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The maintenance of IT systems and cyber controls	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring compliance with statutory disclosures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

B3. ANSWER IF HAD ANY BOARD MEETINGS IN LAST 12 MONTHS (A1b=1+)**In the last 12 months, how many pension board meetings reviewed the scheme's exposure to new and existing risks?***Please write in the number below*

.....

B4. EVERYONE TO ANSWER

To what do the top three governance and administration risks facing your scheme relate?

Please select up to three options below

1. Securing compliance with changes in scheme regulations
2. Ensuring the scheme is compliant with the pensions dashboards requirements
3. Lack of resources/time
4. Recruitment and retention of staff or knowledge
5. Risks related to the remediation of age-related discrimination (McCloud/Sergeant)
6. Risks associated with other remediation or rectification exercises (e.g. reputational, complaints, resourcing etc.
7. Record-keeping (i.e. the receipt and management of correct data)
8. Production of Annual Benefit Statements
9. Systems failures (IT, payroll, administration systems, etc.)
10. Cyber risk (i.e. the risk of loss, disruption or damage to a scheme or its members as a result of the failure of its IT systems and processes)
11. Administrator issues (expense, performance, etc.)
12. Increases in 'business as usual' workload (e.g. restructuring which leads to increased retirement or redundancy quotes)
13. Guaranteed Minimum Pension (GMP) reconciliation
14. Scheme funding or investment (including asset pooling)
15. Impact of wider political decisions (e.g. local government reorganisation)
16. Other (please specify):
17. Don't know

B5. EVERYONE TO ANSWER

Which, if any, of the following actions have you taken in relation to the remediation of age-related discrimination in the 2015 schemes (often referred to as McCloud or Sergeant)?

Please select all the options that apply

1. Assessed the possible long-term administration impacts
2. Carried out immediate detriment calculations
3. Assessed any additional resources likely to be required for 'business as usual' services
4. Secured budget for additional requirements
5. Recruited additional staff
6. Completed relevant system changes
7. Engaged with your Scheme Advisory Board or relevant authority
8. Provided specific information to members
9. Established a dedicated project team
10. Taken other actions (please specify):
11. None of these
12. Don't know

B6. EVERYONE TO ANSWER

How confident does the pension board feel in identifying and evaluating any risks related to each of the following?

<i>Please select one answer per row</i>	Not				
	Not at all confident	particularl confident	Fairly confident	Very confident	Don't know
Regulatory and legislative	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
LGPS SCHEMES ONLY: Investment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Scheme funding	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LGPS SCHEMES ONLY: Climate change and ESG (environmental, social and governance)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cyber control	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administration and data	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

SECTION C – ADMINISTRATION AND RECORD-KEEPING PROCESSES

The next set of questions is about administration and record-keeping.

C1. EVERYONE TO ANSWER

Does the scheme have an administration strategy?

By this we mean policies and procedures that set out the responsibilities of the scheme governing body, administrators and its employer(s).

Please select one answer only

1. Yes
2. No
3. Don't know

C2. EVERYONE TO ANSWER

Which of the following best describes the scheme's administration services?

Please select one answer only

1. Delivered in house
2. Undertaken by another public body (e.g. a county council) under a shared service agreement or outsource contract
3. Outsourced to a commercial third party
4. Other
5. Don't know

C3. ANSWER IF HAD ANY BOARD MEETINGS IN LAST 12 MONTHS (A1b=1+)

In the last 12 months, how many pension board meetings had administration as a dedicated item on the agenda?

Please write in the number below

.....

C4. EVERYONE TO ANSWER**Does the scheme's administrator have a formal data management plan or policy?****A data management plan or policy formally records the scheme's approach to managing and improving its pension scheme data.***Please select one answer only*

1. Yes
2. No
3. Don't know

C5. ANSWER IF HAVE A DATA MANAGEMENT PLAN/POLICY (C4=1)**Does this data management plan or policy set out any of the following?**

<i>Please select one answer per row</i>	Yes	No	Don't know
a) What data is held or used	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Where data is received from or transferred to	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Processes for receiving, sharing and managing data	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
d) Data quality controls in place (e.g. validation checks)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
e) The approach to measuring data and steps being taken to improve data (e.g. an improvement plan)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
f) A data governance framework	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

C6. EVERYONE TO ANSWER**Have you conducted any specific data improvement work in the past 12 months?***Please select one answer only*

1. Yes
2. No
3. Don't know

C7. EVERYONE TO ANSWER**Is your scheme single employer or multi-employer?***Please select one answer only*

1. Single employer scheme (i.e. used by just one employer)
2. Multi-employer scheme (i.e. used by several different employers)

C8. ANSWER IF SINGLE EMPLOYER SCHEME (C7=1)**In the last 12 months, has your participating employer...**

<i>Please select one answer per row</i>	Yes	No	Don't know
a) Always provided you with accurate and complete data?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Always submitted the data required each month to you on time?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

C9. ANSWER IF SINGLE EMPLOYER SCHEME (C7=1)

And in the last 12 months, has your participating employer submitted data to you electronically?

Please select one answer only

1. Yes – all data
2. Yes – some but not all data
3. No
4. Don't know

C10. ANSWER IF MULTI-EMPLOYER SCHEME (C7=2)

To the best of your knowledge, in the last 12 months what proportion of your scheme's employers have...

Please write in the percentage (from 0% to 100%) in each box. If you don't know exactly, please give approximate percentages. By 'data' we are referring to member or contribution data.

a) Always provided you with accurate and complete data? %

b) Always submitted the data required each month to you on time? %

C11. ANSWER IF MULTI-EMPLOYER SCHEME (C7=2)

And in the last 12 months, what proportion of your scheme's employers have...

Please write in the percentage in each box – these three figures should add up to 100%. If you don't know exactly, please give approximate percentages.

Submitted all data to you electronically? %

Submitted some but not all data to you electronically? %

Not submitted any data to you electronically? %

C12. EVERYONE TO ANSWER

Do you automatically test the data received from the employer(s) (i.e. automatic validation)?

For example, checking that there are no duplicate National Insurance numbers or that postcodes are in a valid format.

Please select one answer only

1. Yes
2. No
3. Don't know

C13. EVERYONE TO ANSWER

Do you provide information or training to the employer(s) on the data they need to provide?

Please select one answer only

1. Yes
2. No
3. Don't know

C14. EVERYONE TO ANSWER

In the last 2 years, would you say that the budget you've spent on managing and/or improving the scheme's data has increased, stayed the same or decreased?

In this context we're referring to data about scheme members such as personal identifiers (e.g. name, national insurance number), contribution records, etc.

Please select one answer only

1. Increased
2. Stayed the same
3. Decreased
4. Don't know

C15. ANSWER IF BUDGET FOR MANAGING/IMPROVING DATA HAS INCREASED (C14=1)

What were the reasons for this increased spend on managing and/or improving the scheme's data?

Please select all the options that apply

1. Due to increased focus or scrutiny by TPR
2. To deliver special project requirements (such as changing administrator or preparing for pensions dashboards)
3. To identify and address scheme issues (such as improving understanding of the risks to the scheme, addressing data issues or correcting data errors)
4. To drive efficiencies and cost savings
5. To deliver improved services to members (e.g. online portals, improved delivery of Annual Benefit Statements)
6. To prepare for remediation
7. Other reason (please specify):
8. Don't know

C16. EVERYONE TO ANSWER

In the next 2 years, do you expect your budget for managing and/or improving data to...?

Please select one answer only

1. Increase
2. Stay the same
3. Decrease
4. Don't know

C17. EVERYONE TO ANSWER

In the last 2 years, would you say that the investment you've made in administration technology and/or automation has increased, stayed the same or decreased?

Please select one answer only

1. Increased
2. Stayed the same
3. Decreased
4. Don't know

C18. ANSWER IF INVESTMENT IN ADMINISTRATION TECHNOLOGY/AUTOMATION HAS INCREASED (C17=1)

What were the reasons for this increased investment in administration technology and/or automation?

Please select all the options that apply

1. Due to increased focus or scrutiny by TPR
2. To prepare for the pensions dashboards
3. To prepare for remediation
4. To reduce errors and complaints
5. To drive efficiencies and cost savings
6. To deliver improved services to members (e.g. online portals, improved delivery of Annual Benefit Statements)
7. To implement digital or biometric checks
8. Other reason (please specify):
9. Don't know

C19. EVERYONE TO ANSWER

In the next 2 years, do you expect your budget for administration technology and/or automation to...?

Please select one answer only

1. Increase
2. Stay the same
3. Decrease
4. Don't know

SECTION D – ANNUAL BENEFIT STATEMENTS

The next set of questions is about members' Annual Benefit Statements (ABS).

D1. EVERYONE TO ANSWER

In 2025, in which of the following ways were your active members sent their ABS?

Please select all the options that apply

1. Via a digital online portal,
2. By post
3. Other way(s) (please specify):
4. Don't know

D2. ANSWER IF ABS SENT VIA DIGITAL PORTAL (D1=1)

How are members notified that their ABS is available on the portal?

Please select all the options that apply

1. Email from the scheme
2. Letter from the scheme
3. Informed by the employer
4. Other (please specify):
5. Don't know

D3. ANSWER IF USED MORE THAN ONE METHOD TO SEND ABS AT D1

In 2025, what proportion of your active members were sent their annual benefit statements in each of these ways?

Please write in the percentage (from 0% to 100%). If you do not know exactly, please give approximate percentages

Via a digital online portal100..... %
By post0..... %
Other way(s)0..... %

D4. EVERYONE TO ANSWER

In 2025, what proportion of active members received their ABS by the statutory deadline?

Please write in the percentage below. If you do not know exactly, please give an approximate percentage

.....90.1..... %

D5. ANSWER IF DEADLINE WAS MISSED FOR ANY MEMBERS (D4=0-99%)

Was the missed deadline for issuing active member ABS's reported to TPR?

Please select one answer only

1. Yes - and Breach of Law report made
2. Yes - but decided not to make a Breach of Law report
3. No - not reported
4. Don't know

D6. ANSWER IF MISSED DEADLINE WAS NOT REPORTED TO TPR (D5=3)

What was the main reason for not reporting the breach?

Please select one answer only

1. Not material - few statements affected
2. Not material - very short delay
3. Other reason (please specify):
4. Don't know

D7. EVERYONE TO ANSWER

What proportion of all the ABS's the scheme sent out in 2025 contained all the data required by regulations?

Please write in the percentage below. If you do not know exactly, please give an approximate percentage

.....100..... %

D8. EVERYONE TO ANSWER

Looking forwards, how confident are you that all active members will receive their annual benefit statements by the statutory deadline in 2026?

Please select one answer only

1. Very confident
2. Fairly confident
3. Not particularly confident
4. Not at all confident
5. Don't know

The next set of questions focus on the remediation of age-related discrimination in the 2015 schemes (often referred to as McCloud or Sergeant).

D9. ANSWER IF LGPS (FIRE, POLICE & OTHER SCHEMES SKIP TO D11)

What proportion of your ABS's issued by 31 August 2025 included remedy information for affected members?

Please write in the percentage below. If you do not know exactly, please give an approximate percentage

..... %

D10. ANSWER IF LGPS

Has your Pension Committee/Board made a determination to extend the deadline for including remedy information on ABS's beyond 31 August 2025 for any members where this deadline could not be met?

Please select one answer only

1. Yes
2. No
3. Don't know
4. Not applicable as deadline was met for all members

D11. ANSWER IF NOT LGPS (LGPS SCHEMES SKIP TO SECTION E)

In 2025, what proportion of affected members received their Remediable Service Statement (RSS) by the statutory deadline?

Please write in the percentage (from 0% to 100%) for each type of member. If you do not know exactly, please give approximate percentages

- a) Pensioner membersunknown..... %
- b) Deferred members67.86..... %
- c) Active members88.89..... %

D12. ANSWER IF NOT LGPS

In 2025, what proportion of your affected members were sent their RSS in each of these ways?

Please write in the percentage (from 0% to 100%). If you do not know exactly, please give approximate percentages

- Via a digital online portal100..... %
- By post %
- Other way(s) %

D13. ANSWER IF LESS THAN 100% OF MEMBERS RECEIVED RSS BY DEADLINE AT D11

For those RSS's that could not be issued in time to meet the statutory deadline, what were the main reasons for missing this deadline?

Please select a maximum of three answers

1. Lack of resources or time
2. Complexity of the remedy calculations
3. Lack of necessary data
4. Recruitment, training and retention of staff and knowledge
5. Delays in receiving regulations/guidance
6. Lack of knowledge, effectiveness or leadership among key personnel
7. Issues with systems (IT, administration systems, etc.)
8. Lack of automation of calculations
9. Competing regulatory priorities (e.g. pensions dashboards requirements)
10. Other reason (please specify):
11. Don't know

D14. ANSWER IF LESS THAN 100% OF MEMBERS RECEIVED RSS BY DEADLINE AT D11

Was the missed deadline for issuing affected members their RSS reported to TPR?

Please select one answer only

1. Yes - and Breach of Law report made
2. Yes - but decided not to make a Breach of Law report
3. No - not reported
4. Don't know

D15. ANSWER IF MISSED RSS DEADLINE WAS NOT REPORTED TO TPR (D14=3)

What was the main reason for not reporting the breach?

Please select one answer only

1. Not material - few statements affected
2. Not material - very short delay
3. Other reason (please specify):
4. Don't know

D16. ANSWER IF NOT LGPS

Has your scheme used the regulatory discretion to defer the statutory deadline for issuing some or all RSS's?

Please select one answer only

1. Yes
2. No
3. Don't know

D17. ANSWER IF USED REGULATORY DISCRETION TO DEFER RSS (D16=1)

Has your scheme manager made a written record of any decision to exercise the discretion regarding a particular member or class of members, which includes a full description of the reasons for the decision?

Please select one answer only

1. Yes
2. No
3. Don't know

D18. ANSWER IF LESS THAN 95% OF MEMBERS RECEIVED RSS BY DEADLINE AT D11

At what point do you expect 95% of your RSS's to have been issued?

Please select one answer only

1. Have already reached this target
2. Within 6 months
3. Within 1 year
4. Within 2-3 years
5. Over 3 years
6. Don't know

D19. ANSWER IF NOT YET REACHED 95% TARGET (D18=2-5)

Looking forwards, how confident are you that this timescale will be met?

Please select one answer only

1. Very confident
2. Fairly confident
3. Not particularly confident
4. Not at all confident
5. Don't know

D20. ANSWER IF LESS THAN 100% OF MEMBERS RECEIVED RSS BY DEADLINE AT D11

Have you communicated with those members whose RSS's have missed the statutory deadline?

Please select one answer only

1. Yes, they have been informed of the delay and given an estimated date for their RSS to be issued
2. Yes, they have been informed of the delay but not given an estimated date
3. No
4. Don't know

SECTION E – REPORTING BREACHES

The next set of questions is about the scheme's approach to dealing with any breaches of the law.

E1. EVERYONE TO ANSWER

Do you maintain documented records of any breaches of the law identified?

Please select one answer only

1. Yes
2. No
3. Don't know

E2. ANSWER IF MAINTAIN RECORDS OF BREACHES OF THE LAW (E1=1)

Do these records include the decision taken on whether or not to report the breach of the law to TPR?

Please select one answer only

1. Yes
2. No
3. Don't know

E3. EVERYONE TO ANSWER

In the last 12 months, have you identified any breaches of the law that were not related to Annual Benefit Statements or Remediable Service Statements?

Please select one answer only

1. Yes
2. No
3. Don't know

E4. ANSWER IF IDENTIFIED ANY BREACHES OF THE LAW NOT RELATED TO ABS OR RSS (E3=1)

What were the root causes of the breaches identified?

Please select all the options that apply

1. Systems or process failure
2. Failure to maintain records or rectify errors
3. Management of transactions (e.g. errors or delays in payments of benefits)
4. Failure of the employer(s) to provide timely, accurate or complete data
5. Late or non-payment of contributions by the employer(s)
6. Other employer-related issues (please specify):
7. Something else (please specify):
8. Don't know

E5. ANSWER IF IDENTIFIED ANY BREACHES OF THE LAW NOT RELATED TO ABS OR RSS (E3=1)

In the last 12 months, have you reported any breaches to TPR as you thought they were materially significant? Please do not include any breaches that related to Annual Benefit Statements or Remediable Service Statements.

Please select one answer only

1. Yes
2. No
3. Don't know

SECTION F – IMPROVEMENTS TO GOVERNANCE AND ADMINISTRATION

The next set of questions is about your progress in addressing governance and administration issues.

F1. EVERYONE TO ANSWER

What do you believe are the top three factors behind any improvements made to the scheme's governance and administration in the last 12 months?

Please select up to three options below

1. Improved understanding of underlying legislation and standards expected by TPR
2. Improved engagement by TPR
3. Improved understanding of the risks facing the scheme
4. Resources increased or redeployed to address risks
5. Administrator action (please specify):
6. Scheme manager action (please specify):
7. Pension board action (please specify):
8. Other (please specify):
9. No improvements made to governance/administration in the last 12 months
10. Don't know

F2. EVERYONE TO ANSWER

What are the main three barriers to improving the governance and administration of your scheme over the next 12 months?

Please select up to three options below

1. Lack of resources or time
2. Complexity of the scheme
3. The volume of changes that are required to comply with legislation
4. Recruitment, training and retention of staff and knowledge
5. Lack of knowledge, effectiveness or leadership among key personnel
6. Poor communications between key personnel (board, scheme manager, administrator, etc.)
7. Employer compliance
8. Issues with systems (IT, payroll, administration systems, etc.)
9. The remediation process (also referred to as 'McCloud' or 'Sergeant')
10. The pensions dashboards requirements
11. Other (please specify):
12. There are no barriers
13. Don't know

SECTION G – GENERAL CODE OF PRACTICE

The next set of questions is about TPR's General Code of Practice. This consolidates ten of TPR's previous codes of practice and covers aspects of governance common to all types of scheme.

G1. EVERYONE TO ANSWER

How familiar are you with the expectations set out in the General Code of Practice?

Please select all the options that apply

1. You have a very good understanding of it
2. You have a fairly good understanding of it
3. You know a little bit about it
4. You are aware of it but know nothing about it
5. You were not aware of the General Code before today
6. Don't know

G2. ANSWER IF AWARE OF GENERAL CODE (G1=1-4)

Has the governing body compared the scheme's governance processes with the General Code of Practice to identify any gaps where improvements are required?

Please select one answer only

1. Yes
2. No, but plan to do this (or are in the process of doing this)
3. No, and no plans to do this
4. Don't know

G3. ANSWER IF HAVE COMPARED PROCESSES AGAINST GENERAL CODE (G2=1)

Did you identify any gaps where improvements were required?

Please select one answer only

1. Yes
2. No
3. Don't know

G4. ANSWER IF IDENTIFIED ANY GAPS (G3=1)**Thinking about the gaps that you identified in the scheme's governance processes, have you...?***Please select one answer only*

1. Already remedied these
2. Started work to remedy these
3. Or not yet started work to remedy these
4. Don't know

G5. ANSWER IF AWARE OF GENERAL CODE (G1=1-4)**Based on what you know about it, to what extent do you agree or disagree that the General Code of Practice has...?**

<i>Please select one answer per row</i>	Strongly disagree	Tend to disagree	Neither agree nor disagree	Tend to agree	Strongly agree	Don't know
Improved how this scheme is governed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased the work required by this scheme to meet TPR's expectations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Made it easier to understand TPR's expectations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

SECTION H – ATTRIBUTION

Thank you for completing this survey. Your responses will help TPR understand how schemes are progressing and any issues they may face, which will inform further policy and product developments. Before you submit your answers, there are just a few more questions about your survey responses.

H1. EVERYONE TO ANSWER**Which of the following best describes your role within the pension scheme?***Please select one answer only*

1. Scheme manager*
2. Representative of the scheme manager
3. Pension board chair
4. Pension board member
5. Administrator
6. Other (please specify): **Head of HR with Pensions Portfolio**.....

**In this survey 'scheme manager' refers to the definition within the Public Service Pensions Act, e.g. the Local Authority, Fire and Rescue Authority, Police Pensions Authority, Secretary of State/Minister or Ministerial department.*

H2. EVERYONE TO ANSWER

What other parties did you consult with to complete this survey?

Please select all the options that apply

1. Scheme manager
2. Representative of the scheme manager
3. Pension board chair
4. Pension board member
5. Administrator
6. Other
7. Did not consult with any other parties

H3. EVERYONE TO ANSWER

To inform TPR's engagement going forward, they would like to build an individual profile of your scheme by linking your scheme name to your survey answers. This will only be used for internal purposes by TPR and your scheme name would not be revealed in any published report.

Are you happy for your responses to be linked to your scheme name and supplied to TPR for this purpose?

Please select one answer only

1. Yes, I am happy for my responses to be linked to my scheme name and supplied to TPR for this purpose
2. No, I would like my responses to remain anonymous

H4. EVERYONE TO ANSWER

And would you be happy for the responses you have given to be linked to your scheme name and shared with the relevant scheme advisory board?

This is to help inform the advisory boards of areas for improvement and to further their engagement with pension boards.

Please select one answer only

1. Yes, I am happy for my responses to be linked to my scheme name and shared with the relevant advisory board
2. No, I would like my responses to remain anonymous

H5. EVERYONE TO ANSWER

Please record your name below. This is just for quality control purposes and will not be passed on to TPR.

Please write in below

.....Michelle
Richardson.....

H6. EVERYONE TO ANSWER

Finally, please use the space below if you have any other comments or would like to clarify/ explain any of the answers you have given.

Please write in below if applicable

.....

.....

.....

.....

Thank you. Please now submit your responses through the [online survey link](#) contained in your invitation email. If you have any queries or technical issues please contact James Murray (Director, OMB Research) at james.murray@ombresearch.co.uk

CFB Pensions Risk Register					Original Risk (Before Mitigation)			Current Risk (After Mitigation)							
Risk ID	Description of Risk (IF, THEN)	Theme	Date Added to Register	Date of Last Review	Original Impact	Original Likelihood	Original Risk Score	Current Impact	Current Likelihood	Current Risk Score	Direction of Travel	Risk Narrative (reason for inclusion and risk history)	Control Measures	Register Status	Risk carried forward from archived register
1	IF there is an operational disaster (i.e. flood/fire) THEN there is a risk that physical records containing member pension information may be lost, damaged or rendered inaccessible	BAU	Jun-25	Jan-26	4	2	8	4	1	4	No Change	Loss of data relating to pension members would result in an inability to provide an accurate and efficient pension service	Member records are stored electronically and data is backed up regularly. Business continuity and disaster recovery arrangements in place internally and with our pension administrators and are also contained in the contract agreements	Continuing Risk	Yes
2	IF member data and/or records are incomplete or inaccurate THEN there is a significant risk that pension entitlements may be miscalculated or incorrectly paid. This could lead to regulatory penalties for maladministration by the Pensions Regulator, an increase in Internal Dispute Resolution Procedure (IDRP) cases initiated by affected members and potential reputational damage to the authority	BAU	Jun-25	Jan-26	4	3	12	4	2	8	No Change	Incorrect data will result in inaccurate pension calculations and Annual Benefit Statements and inaccurate reporting to Home Office and The Pensions Regulator. The introduction of Pensions Dashboards may require additional work to ensure all member data complies with relevant guidance	Scheme member data reconciliation undertaken on a regular basis. Internal Audit undertaken annually. Monthly payroll reporting from HBC established. Quarterly contract management meetings with pension administrator to address any issues identified.	Continuing Risk	Yes
3	IF Annual Benefit Statements are not issued by the statutory deadline THEN the Authority would be in breach of pension scheme regulations, potentially resulting in enforcement action or financial penalties from the Pensions Regulator	BAU	Jun-25	Jan-26	4	3	12	4	3	12	Cooling Down	If errors are found within pension data or system errors are evident within statements produced or system cannot produce statements. Any breaches would need to be reported to the Pension Regulator. In 2024 ABS were not issued to all members due to the complexities of pension remedy. Recorded at PMT/LPB and reported to TPR	Effective administration working closely with pension administrator to identify any barriers to achievement and potential resolution before the deadline.	Continuing Risk	Yes
4	IF pension contributions are not accurately deducted from member salaries , THEN this may result in incorrect payments, requiring retrospective adjustments and potentially causing financial inconvenience for members and administrative burden for the Authority	BAU	Jun-25	Jan-26	4	3	12	4	1	4	No Change	Incorrect pension contributions being recorded and collected without necessary checks and reconciliations in place	Deduction and rules checked with payroll provider; reconciliation of deduction carried out by Finance on a monthly basis; internal audit review deductions as part of audit scope	Continuing Risk	Yes
5	IF the authority fails to remit employer and/or employee pension contributions to the scheme in a timely manner, THEN this could result in insufficient funds being allocated to the pension fund, potentially impacting the scheme's financial sustainability and breaching statutory obligations	BAU	Jun-25	Jan-26	4	3	12	4	1	4	No Change	Failure to pay contributions to the scheme could result in insufficient funds being allocated to the pension fund	Pension deductions are accounted for by the service and therefore contributions are deducted directly from employees pay and accounted for in the pension fund account. The pension fund account is audited on an annual basis. Returns are also supplied to the Home Office	Continuing Risk	No
6	IF the authority misinterprets or incorrectly applies pension scheme rules or relevant legislation , THEN this could lead to incorrect benefit calculations, potential fines or sanctions from HMRC and The Pensions Regulator, and reputational damage to the organisation.	BAU	Jun-25	Jan-26	4	3	12	4	3	12	No Change	Legislation is complex and has been the subject of significant change since 2015 with limited subject matter expertise internally	Central LGA resource available to assist with interpretation of rules and possible provision of legal opinion where this has been sought. Technical team of pension administrator to provide advice on action required.	Continuing Risk	No
7	IF the authority fails to effectively communicate with scheme members , THEN this may lead to confusion, reduced engagement, and a lack of understanding regarding pension entitlements and changes to the scheme.	BAU	Jun-25	Jan-26	3	3	9	3	3	9	No Change	Effective communication with scheme members is critical to ensuring they understand their pension entitlements, any changes to the scheme, and how these changes may impact their retirement planning. Poor communication can undermine trust in the scheme, reduce member satisfaction, and ultimately affect the authority's ability to deliver its pension obligations effectively.	Annual member feedback survey. Develop a communications strategy and plan to include multi channel methods including use of SharePoint, Firewire, Websites and F2F engagement.	Continuing Risk	No
8	IF the Local Pension Board fails to hold at least four quorate meetings per year , THEN the authority may be in breach of statutory governance requirements, potentially leading to regulatory scrutiny and non-compliance consequences.	BAU	Jun-25	Jan-26	2	2	4	2	2	4	No Change	Statutory guidance requires the Board to meet at least 4 times per year with a quorum of no less than four employer and member representatives to ensure effective oversight. Infrequent or non-quorate meetings may hinder the Board's ability to provide quality pension scheme governance. LPB membership changes frequently due to changes in Fire Authority membership	Annual meeting schedule produced. Tracking of attendance. Training to members so they understand the importance of their role. Appointment of alternatives. Enable hybrid options to attending. A Deputy Chair is assigned and will lead meetings in the absence of the Chair.	Continuing Risk	No
9	IF there are key member departures from the Local Pension Board , THEN the board may be unable to operate effectively or meet its statutory governance responsibilities, potentially resulting in non-compliance with pension regulations.	BAU	Jun-25	Jan-26	3	2	6	3	2	6	No Change	The departure of key members, particularly those with specialist knowledge or leadership roles, can significantly disrupt the Board's ability to function effectively. Additionally, prolonged vacancies or difficulty in recruiting suitable replacements can lead to non-compliance with regulatory requirements, increased scrutiny from oversight bodies, and reputational damage.	Develop a succession plan. Maintain an up-to-date list of eligible and interested individuals who can be approached quickly to fill vacancies. Have arrangements in place for temporary support or advisory input from former members or external experts during transition periods	Continuing Risk	No
10	IF roles and responsibilities related to pension management are not clearly defined or understood , THEN this may lead to ineffective internal oversight, inefficiencies in administration, and potential non-compliance with governance requirements	BAU	Jun-25	Jan-26	4	3	12	4	2	8	No Change	The complexity of pension scheme governance demands a coordinated approach, and without clarity in roles the authority may struggle to meet its statutory obligations.	Key members identified to attend PMT. Clear definition of working group roles and responsibilities. Training provided for HR and Finance.	Continuing Risk	Yes

11	IF the authority experiences limited capacity, resources, or in-house pension knowledge , THEN key actions and statutory responsibilities may not be addressed in a timely or effective manner, increasing the risk of non-compliance and operational inefficiencies.	BAU	Jun-25	Jan-26	4	3	12	4	2	8	No Change	The effective management of a pension scheme requires adequate staffing, resources, and specialist knowledge to meet complex regulatory and operational demands. The Authority does not have a dedicated Pensions function or sufficient pensions expertise in its current workforce and is reliant on the pensions administrator	Review capacity at PMT to identify concerns so that contingency plans can be put in place. Draw capacity from other areas of the organisation. Additional temporary resource. Upskilling HR and Finance teams. Consider collaboration with regional FRAs.	Continuing Risk	Yes
12	IF actions and updates from LGA bulletins and circulars are not identified and acted upon , THEN the authority may miss critical regulatory or procedural changes, increasing the risk of non-compliance and operational oversight.	BAU	Jun-25	Jan-26	3	3	9	3	2	6	No Change	The LGA issues monthly bulletins and ad-hoc circulars containing important updates on legislative changes, regulatory guidance, and best practices relevant to pension scheme governance and administration.	HR produced a tracker to monitor actions. Bulletins and circulars are a standing agenda item at PMT and LPB.	Continuing Risk	Yes
13	IF the contract with XPS is not effectively managed , THEN there is a risk of suboptimal service delivery, which could impact the quality, timeliness, and compliance of pension administration services.	BAU	Jun-25	Jan-26	4	2	8	4	2	8	No Change	The authority relies on XPS to deliver core pension administration services. Effective contract management is essential to ensure that service levels, performance standards, and compliance obligations are consistently met.	Robust contract management against agreed service specification and KPIs. Escalation of concerns through designated account manager. Performance reported at PMT and LPB	Continuing Risk	Yes
14	IF the remedy implementation is delayed , THEN members may experience uncertainty, and the authority may face criticism or regulatory scrutiny.	Sergeant/McCloud	Jun-25	Jan-26	3	4	12	3	4	12	No Change	The remedy involves complex rollback and reinstatement processes across multiple schemes and years. There has been delays in receipt of central policy and guidance.	LGA / SAB providing communication and guidance. Maintain regular communication with pension administrators to monitor progress against the project and identify any barriers to achievement so corrective action can be taken	Continuing Risk	Yes
15	IF historical service and pay data is incomplete or inaccurate , THEN the authority may be unable to correctly calculate benefits, leading to member disputes and compliance issues.	Sergeant/McCloud	Jun-25	Jan-26	3	3	9	3	3	9	No Change	Accurate data from 2015-2022 is essential for applying the rollback to legacy schemes. Pension administrator has identified members with missing or inaccurate data resulting in no RSS being produced.	Response to data queries being prioritised	Continuing Risk	No
16	IF members are not adequately informed about the remedy and their options , THEN this may lead to confusion, complaints, and reputational damage	Sergeant/McCloud	Jun-25	Jan-26	3	3	9	2	3	6	No Change	Members must make informed choices between legacy and reformed scheme benefits.	Member engagement sessions, one to one meetings, articles in Firewire, TU engagement	Continuing Risk	Yes
17	IF the authority or its administrators lack sufficient resources or expertise , THEN the remedy may not be implemented effectively or within required timescales.	Sergeant/McCloud	Jun-25	Jan-26	3	3	9	3	2	6	No Change	The remedy adds significant workload to already stretched teams	Additional temporary resource has been implemented internally and pension administrator have invested significantly in additional resource	Continuing Risk	Yes
18	IF the remedy is not applied in accordance with legislation and guidance , THEN the authority may be exposed to legal challenge or regulatory action.	Sergeant/McCloud	Jun-25	Jan-26	3	3	9	3	3	9	No Change	The remedy is legally mandated and subject to oversight. The Authority did not meet the statutory deadlines for ABS, PSS and RSS issuance in 2024/25	Breaches have been assessed and reported to the Pensions Regulator	Continuing Risk	Yes
19	IF the financial implications of the remedy (e.g., contribution adjustments, back payments) are not accurately forecasted , THEN this may impact budgeting and funding strategies.	Sergeant/McCloud	Jun-25	Jan-26	3	3	9	3	3	9	No Change	The remedy may result in retrospective financial adjustments.	Establish financial reserves or contingency funds to absorb unexpected costs or higher than anticipated take up rates. Keep finance teams, senior management, and governance bodies informed of potential financial impacts to ensure alignment and proactive planning. Track member engagement and take up during the options exercise to refine financial forecasts in real time.	Continuing Risk	No
20	IF historical employment and pay data for retained firefighters is incomplete or inaccurate , THEN pension entitlements may be miscalculated, leading to disputes and delays.	Matthews	Jun-25	Jan-26	2	2	4	2	2	4	No Change	The remedy requires accurate historical data on retained firefighters' service and pay dating back to the 1960s. The Authority only retained records back to ?? . Inaccurate or missing data could result in incorrect benefit calculations, disputes, and delays in processing elections.	Legislation allows for assumptions to be made where there is no data	Continuing Risk	Yes
21	IF eligible retained firefighters are not correctly identified or contacted , THEN some individuals may miss the opportunity to join the modified scheme, resulting in legal or reputational consequences.	Matthews	Jun-25	Jan-26	3	3	9	3	2	6	No Change	Identifying all eligible retained firefighters, especially those who have left service or retired, is complex. If individuals are missed or incorrectly excluded from the options exercise, the authority could face legal challenges or reputational damage for failing to uphold the remedy's intent.	Tracing service commissioned to undertake a trace of all non respondents.	Continuing Risk	Yes
22	IF the pension calculations for pre-July 2000 service are not correctly applied , THEN benefit errors may occur, affecting member trust and compliance.	Matthews	Jun-25	Jan-26	3	3	9	3	3	9	No Change	Calculating pension benefits under the modified scheme involves applying retrospective service credits, contribution rates, and interest. These calculations are technically complex and must be accurate to ensure fairness and compliance. Errors could lead to under or overpayments and member dissatisfaction	HR Team members have been trained to use the Matthews GAD Calculator. All calculations are checked before being finalised	Continuing Risk	No
23	IF members do not fully understand the options exercise or the implications of joining the modified scheme , THEN take up may be low or decisions may be poorly informed.	Matthews	Jun-25	Jan-26	3	3	9	3	2	6	No Change	The remedy involves offering eligible members a choice to purchase past service. If communications are unclear or poorly timed, members may not understand their options or the implications of their decisions, leading to low take up, complaints, or poor retirement planning outcomes.	LGA template documents are being utilised. HR team are delivering face to face sessions to explain the options to individual members	Continuing Risk	No

24	IF the authority or its administrators lack the capacity to manage the second options exercise effectively, THEN implementation may be delayed or flawed.	Matthews	Jun-25	Jan-26	3	4	12	3	3	9	No Change	The second options exercise adds significant workload to already stretched teams. Without sufficient staffing or resources, the authority may struggle to meet deadlines, respond to member queries, or process elections efficiently.	Additional temporary resource has been added to the HR team. Close working with project lead within the pensions administration at XPS	Continuing Risk	Yes
25	IF the remedy is not implemented in accordance with the Matthews judgment and related legislation, THEN the authority may face legal challenge or regulatory action.	Matthews	Jun-25	Jan-26	3	3	9	3	2	6	No Change	The Matthews remedy is a legal requirement following a court ruling. Failure to implement it correctly could result in legal action, regulatory penalties, or intervention by oversight bodies such as The Pensions Ombudsman or The Pensions Regulator.	Deadline for completion has been extended to 31/03/26.	Continuing Risk	Yes
26	IF the cost implications of the remedy (e.g. backdated contributions, employer liabilities) are not accurately forecasted, THEN this may affect financial planning and budgeting.	Matthews	Jun-25	Jan-26	3	3	9	3	3	9	No Change	The remedy may involve backdated employer contributions, interest payments, and administrative costs. If these are not accurately forecasted and budgeted for, the authority may face financial strain or need to reallocate resources from other priorities.	Establish financial reserves or contingency funds to absorb unexpected costs or higher than anticipated take up rates. Keep finance teams, senior management, and governance bodies informed of potential financial impacts to ensure alignment and proactive planning. Track member engagement and take up during the options exercise to refine financial forecasts in real time.	Continuing Risk	Yes
28	IF member data is incomplete, inaccurate, or inconsistent, THEN the dashboard may fail to match individuals with their pensions, leading to member confusion and complaints.	Dashboards	Jun-25	Jan-26	3	3	9	3	2	6	No Change	Dashboards rely on accurate and complete data to match individuals with their pensions. Poor data quality (e.g. missing NI numbers, incorrect dates of birth) can lead to failed matches or incorrect information being displayed, eroding member trust and increasing administrative burden due to complaints and corrections.	XPS have produced a Dashboard Readiness report and are undertaking a data quality project in preparation for our connection	Continuing Risk	No
29	IF third-party administrator fails to deliver required services on time or to standard, THEN the scheme may not meet its obligations.	Dashboards	Jun-25	Jan-26	3	3	9	3	2	6	No Change	Many schemes rely on administrators or Integrated Service Providers (ISPs) to manage dashboard connectivity. If these providers underperform or miss deadlines, the scheme remains accountable and may face penalties or reputational harm.	Robust contract management against the criteria defined in the PID. Regular updates on progress provided to PMT and LPB	Continuing Risk	No
30	IF implementation costs exceed initial estimates, THEN this may impact Brigade budgets and financial planning.	Dashboards	Jun-25	Jan-26	3	3	9	3	3	9	No Change	Implementation may involve unforeseen costs such as system upgrades, consultancy fees, or additional staffing. Without careful budgeting and monitoring, these costs can exceed expectations and strain Brigade resources.	Dashboard Readiness report has provided estimated costs and financial reserves have been identified for the initial costs with the annual costs being incorporated into future budgets	Continuing Risk	No
31	IF financial information is not provided to Home Office in an accurate and timely manner THEN the AME Pension Grants will be delayed or not paid at all resulting in significant financial pressure on the Brigade.	BAU	Jul-25	Jan-26	4	2	8	4	2	8		Pension Grant is claimed in two parts, 80% of the forecast pension costs for the future 6 years and the settlement of the prior years final position (less 80% already received). The pension fund captures payments made for lump sums and ongoing pensions. Future estimates are based on workforce planning assumptions, which become less accurate the further into the future they are. If the assumptions are inaccurate, or there is failure to submit claims in a timely manner then the Brigade will receive incorrect or no grant at all therefore pension payments will have to be met from Brigade funds or borrowing, placing significant pressure on the Brigades financial position.	Pension Grant application are made in two instalments. Notification is provided by Home Office with deadline dates for submission. Resources are allocated to ensure all financial information is collated to enable returns can be completed in a timely manner. XPS provide scheme data. Financial information is retrieved from Integra and workforce planning information is taken from HR establishment data. HoFP collates the information for the returns [there are currently no checks undertaken on this information]. The return is completed via Home Office Portal and approved by either the Treasurer or Deputy Treasurer.	Continuing Risk	No
32	IF financial information is not provided to Home Office in an accurate and timely manner THEN the Firefighters Remedy Compensation Grant will be delayed or not paid at all resulting in financial pressure on the Brigade.	Sergeant/McCloud	Jul-25	Jan-26	3	2	6	3	2	6		FFs Remedy Compensation Grant is claimed quarterly in arrears. Actual payments made need to have been identified as remedy, compensation and interest. XPS provide this information as part of the pension documentation and payroll system. The initial coding of the pension does not separate these and a manual process has to be undertaken to correct it. Failure to identify remedy payments will result in remedy costs being met by the Pension Fund (annually) rather than claimed from the Remedy Grant (quarterly), and infer an error on the Pension Fund as Compensation and Interest are not to be paid by the Pension Fund. Internal Audit and Home Office may identify errors as part of their inspection processes resulting in the Brigade receiving warnings, possible fines from HMRC, and incorrect funding through Pension and or Remedy Grants.	Pension Grant application are made quarterly in arrears. These have been NIL returns thus far as no payments had been made for compensation factors. Notification is provided by Home Office with deadline dates for submission. Resources are allocated to ensure all financial information is collated to enable returns to be completed in a timely manner. XPS provide scheme data. HoFP collates the information for the returns [there are currently no checks undertaken on this information]. The return is completed via Home Office Portal and approved by either the Treasurer or Deputy Treasurer.	Continuing Risk	No

33

IF local pension board members do not have sufficient knowledge or understanding of the Firefighters' Pension Scheme, THEN there is a risk that their ability to effectively scrutinise scheme administration and governance may be compromised. This could lead to ineffective oversight, misinterpretation of scheme rules, and non-compliance with regulatory requirements, potentially resulting in reputational damage and financial mismanagement.

BAU

Oct-25

Jan-26

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4

20

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4

20

Effective scrutiny by pension board members is essential to safeguarding the integrity, compliance, and financial health of the Firefighters' Pension Scheme. In order to be able to undertake this role effectively members need a good understanding of the schemes. Although it is acknowledged that some board members have knowledge of the LGPS , changes to the board membership in recent months has meant that knowledge of the FPS's, has been reduced.

All board members should undertake the LGA LPB training , a refresher session is available for members who have already received the full training

Continuing

Risk

No

Term/Score	
Original Risk	The as
Current Risk	The risk level at the

Score	Category
1	Insignificant
2	Minor
3	Significant
4	Major
5	Extreme

Score	Category
1	Rare
2	Unlikely
3	Moderate
4	Likely
5	Almost Certain

Definitions

assessed level of risk when the item was first identified and included within the risk register.

time of most recent review, taking into account the impact of the risk control measures that have been implemented.

Impact (How severe would the outcomes be if the risk occurred?)

Scope, ie if the risk were to occur it may have any of the following consequences (professional judgement required)

Minimal impact on operations or objectives, no legal or financial impact, the risk won't result in injury/illness of staff or the public

Some impact on achieving objectives that can be easily remedied, mild injury/illness of staff or the public, small financial implications, adverse local publicity/negative public opinion, localised low level disruption to a single function

Significant impact on achieving objectives which requires management attention, injury/illness requiring medical attention but limited treatment, scrutiny from Regulatory Bodies, serious environmental consequences, significant financial/budgetary implications, adverse local publicity of a major/persistent nature, impact extending to several functions/services

Threatens achievement of objectives with significant consequences, serious irreversible injury to staff or the public, failure to meet a political, statutory or legislative mandate, negative national media coverage, major financial/budgetary implications, major environmental consequences

Could lead to termination of operations or programs and inability to deliver critical services, large scale irreversible serious injuries and/or fatalities of staff or the public, highly damaging impact on organisational effectiveness, persistent national media coverage resulting in damage to reputation, extreme financial/budgetary implications, prosecution by enforcing bodies, irreversible environmental consequences, infringement of statutory/legislative responsibilities

Likelihood (What is the probability the risk will happen?)

Scope (professional judgement required)

Unlikely to happen/May occur only in exceptional circumstances (less than 5% chance)

Possible to happen/Could occur at some time (6-30% chance)

Likely to happen/Might occur at some time (31-70% chance)

Almost sure to happen/Will probably occur in most circumstances (71-95% chance)

Sure to happen/Expected to occur in most circumstances (more than 96% chance)

		Scoring Matrix Outcomes (Impact X Likelihood)			
		Impact			
		Insignificant 1	Minor 2	Significant 3	Major 4
Likelihood	5 Almost Certain	M	H	H	VH
	4 Likely	L	M	H	H
	3 Moderate	L	M	M	H
	2 Unlikely	VL	L	M	M
	1 Rare	VL	VL	L	L

Very Low (1-2)
Low (3-4)
Medium (5-9)
High (10-16)
Very High (17-25)

ood)
Extreme 5
VH
VH
H
H
M

Record of Risk Changes, Controls and Actions

Risk Description:

IF Annual Benefit Statements are not issued by the statutory deadline or financial penalties from the Pensions Regulator

Date of Review/Changes

Details of Change

**Impact Score
(Following Changes)**

**Likelihood Score
(Following Changes)**

14/01/2026

We did not issue all statements in 2025, and this was reported to the Pensions Regulator. The risk rating was increased last quarter to reflect this. As the issue has now been addressed, the risk level can be reduced.

4

3

e THEN the Authority would be in breach of pension scheme regulations, potentially resulting in		
Total Risk Score (Following Changes)	Details of Response to Change (Eg introduction of further control measures or completion of actions)	Ongoing/Outstanding Actions (Action, By Who, By When)
12		

enforcement action

Details
Submitted By
(Name)

Michelle Richardson



Confirmation of Connection

Firefighters Pension Scheme - Cleveland

We are pleased to confirm that we have successfully connected the above to the Pensions Dashboards Central Data Architecture.

This connection has been established in line with the methods and processes previously communicated to you, and on schedule with the connection timetable issued by the Pensions Dashboards Programme (PDP) and outlined in the Regulatory Guidance.

Please see below extract from Pension Fusion, which confirms that the Schemes were successfully registered with MaPs, published to the PDP and the connection has been enabled.

We will update you on PDP testing and connection developments as we continue to connect schemes ahead of Dashboards being made available to users.

SCHEME NAME	CONNECTION DATE	PDP REGISTRATION STATUS	SCHEME SHARING STATUS
Firefighters Pension Scheme – Cleveland 2015 (CARE)	31/10/2025	Success	Enabled
Firefighters Pension Scheme – Cleveland 2006	31/10/2025	Success	Enabled
Firefighters Pension Scheme – Cleveland 1992	31/10/2025	Success	Enabled



Further information

Should you have any questions or require further information, please contact us.

e: XPSpensionsDashboardsSupport@xpsgroup.com

FPS Bulletin Action Log

[illegible]
