

22 April 2022

**To: The Chair and Members of the Cumbria  
Fire Local Pension Board**

# Agenda

## CUMBRIA FIRE LOCAL PENSION BOARD

A meeting of the Cumbria Fire Local Pension Board will be held as follows:

**Date: Tuesday 3 May 2022**

**Time: 2.00 pm**

**Place: Furness Peninsula Blue Light Hub, Beehive Business  
Park, Thomas Way, Ulverston, LA12 7TU**

**Dawn Roberts**

**Executive Director – Corporate, Customer and Community Services**

**Enquiries and requests for supporting papers to: Anthony Farrar**

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*This agenda is available on request in alternative formats*

## **MEMBERSHIP**

### Employer Representatives

Mr A Lamb  
Mrs J Willis (Vice Chair)

### Scheme Members

Mr D Harrison (Chair)  
Mr M Nicholson

# **A G E N D A**

## **1 APOLOGIES FOR ABSENCE**

To receive any apologies for absence.

## **2 MEMBERSHIP AND TERMS OF REFERENCE**

To note the Terms of Reference and Membership of the Board (copy enclosed).

## **3 DISCLOSURES OF INTEREST**

Members are invited to disclose any disclosable pecuniary interest they have in any item on the agenda which comprises

- 1 Details of any employment, office, trade, profession or vocation carried on for profit or gain.
- 2 Details of any payment or provision of any other financial benefit (other than from the authority) made or provided within the relevant period in respect of any expenses incurred by you in carrying out duties as a member, or towards your election expenses. (This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
- 3 Details of any contract which is made between you (or a body in which you have a beneficial interest) and the authority
  - (a) Under which goods or services are to be provided or works are to be executed; and
  - (b) Which has not been fully discharged.
- 4 Details of any beneficial interest in land which is within the area of the authority.
- 5 Details of any licence (alone or jointly with others) to occupy land in the area of the authority for a month or longer.
- 6 Details of any tenancy where (to your knowledge)
  - (a) The landlord is the authority; and
  - (b) The tenant is a body in which you have a beneficial interest.
- 7 Details of any beneficial interest in securities of a body where
  - (a) That body (to your knowledge) has a place of business or land in the

area of the authority; and

(b) Either –

- (i) The total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or
- (ii) If that share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

In addition, you must also disclose other non-pecuniary interests set out in the Code of Conduct where these have not already been registered.

#### **Note**

**A “disclosable pecuniary interest” is an interest of a councillor or their partner (which means spouse or civil partner, a person with whom they are living as husband or wife, or a person with whom they are living as if they are civil partners).**

#### **4 EXCLUSION OF PRESS AND PUBLIC**

To consider whether the press and public should be excluded from the meeting during consideration of any items on the agenda.

#### **5 MINUTES**

To receive the minutes of the previous meeting held on 1 February 2022 (copy enclosed).

#### **6 SCHEDULE OF FUTURE MEETINGS**

To note the Schedule of Future Meetings (copy enclosed).

#### **7 MONITORING REPORT FOR THE PERIOD ENDING 31 DECEMBER 2021**

To consider a report from the Chief Fire Officer (copy enclosed).

#### **8 LPPA - VIRTUAL UPDATE ON PROJECT PACE**

To receive a presentation from Rachel Blundell, Deputy Director Member Operations, Local Pensions Partnership Administration

#### **9 DATE AND TIME OF NEXT MEETING**

To note that the next meeting will take place at 2pm on 26 July 2022.

## **PART 2 - ITEMS CONSIDERED IN THE ABSENCE OF THE PRESS AND PUBLIC**

### **10 UPDATE ON SARGEANT REMEDY AND IMMEDIATE DETRIMENT**

To consider a report from the Chief Fire Officer (copy enclosed).

### **11 VERBAL UPDATE ON EMERGING ISSUES**

To receive a general verbal update from the Chief Fire Officer.

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## **Part 2Q: Cumbria Fire Local Pension Board**

### **1 Summary**

- 1.1 The Cumbria Fire Local Pension Board is responsible for assisting the Scheme Manager of the Cumbria Firefighters' Pension Schemes to comply with all relevant legislative requirements and to ensure the effective governance of the schemes for Cumbria Firefighters Pensions.

### **2 Functions of the Cumbria Fire Local Pension Board**

- 2.1 The Cumbria Fire Local Pension Board is responsible for assisting the Scheme Manager of the Cumbria Firefighters' Pension Scheme:
- (a) to secure compliance with:
    - (i) The Firefighters' Pension Scheme (England) Regulations 2014 (as amended from time to time);
    - (ii) Other legislation relating to the governance and administration of the Firefighters' Pension Schemes (FPS); and
    - (iii) The requirements imposed by the Pensions Regulator in relation to the FPS; and
  - (b) To ensure the effective and efficient governance and administration of the FPS.
- 2.2 The Board must have a policy and framework to meet the knowledge and understanding requirements of section 248A of the Pensions Act 2004.
- 2.3 In its role in assisting the Scheme Manager as described above, the Board shall report twice yearly to Council on matters reviewed and suggestions for their consideration.
- 2.4 Where the Board is concerned that due consideration has not been given to matters of non-compliance the Board may submit a report for consideration by the Audit and Assurance Committee as the body designated by the Scheme Manager with the capacity to investigate such matters on its behalf.
- 2.5 The Board is constituted under the Public Service Pension Act 2013 and the Fire Pension Scheme (Amendment) (Governance) Regulations 2014 and is therefore not subject to the requirements of s.101 of the Local Government Act 1972.

- 2.6 The Board has no remit as a decision making body but is established to assist the Scheme Manager fulfil its functions which shall be deemed to cover all aspects of governance and administration of the Pension Scheme.

### **3 Operating Structure and Codes of Conduct of the Cumbria Fire Local Pension Board**

- 3.1 The operating structure and codes of conduct of the Cumbria Fire Local Pension Board is as follows:

- a) The Board will be quorate if 50% of designated members (i.e. 2) are in attendance.
- b) Prior to appointment to the Board all members will be required to sign up to the Board's Code of Conduct and Conflicts of Interest Policy. As a body representing the public interest the Code of Conduct and Conflicts of Interest Policy of members of the Fire Local Pension Board will be aligned to those applicable to members of the Pension Committee.
- c) The Board will meet as a minimum twice a year. Meetings will be held during normal working hours and will predominantly be held within County boundaries.
- d) Where required, a minimum of two Board members (one from the scheme member representatives and one from the scheme employer representatives) or the Scheme Manager can request a special meeting be convened. Notice of ten working days must be given.
- e) As a non-decision-making body the Board have no authority to establish working parties / sub-groups.
- f) Each member shall have an equal vote and, should it be required, the Chair will have the casting vote.

### **4 Commissioning of Service providers and Advisors**

- 4.1 All members of the Cumbria Fire Local Pension Board have the right to access the support of independent advisors, however due regard has to be taken of securing value for money and as such whether in the first instance officers of the County Council could provide the assistance required.
- 4.2 Items of expenditure by the Board must have prior approval from the Section 151 Officer.



## 5 Role of Officers

- 5.1 Reasonable secretarial and professional support will be provided by Officers of the Scheme Manager. Costs associated with this will be charged to Cumbria Fire and Rescue Service.

## 6 Publication and Data Protection

- 6.1 As a general principle meetings will be open to the public.
- 6.2 Paper or electronic versions (as requested) of all agendas and papers will be provided to all members of the Board prior to a meeting. The Chair can accept that items be tabled on the day should such a need arise.
- 6.3 As a matter of policy the Pension Board has adopted the principals of paperless working, therefore as a matter of course public access to all agendas, public papers and minutes etc. will be available on the Council's website. On request alternative media versions are available.
- 6.4 The County Council as the Scheme Manager is the registered data controller of the Cumbria FPS, and as such all policies and practices in this regard applicable within the County Council are directly applicable to the Board.

## 7 Membership

- 7.1 Equal representation between scheme employers and scheme members is required. The membership of the Cumbria Fire Local Pension Board will comprise two scheme member representatives and two scheme employer representatives.
- 7.2 **Appointment of Board members** - to ensure an open and transparent selection process and to ensure the Scheme Manager meets its obligation to ensure appointed members have the relevant understanding and capacity, the selection process will be through application, matching to a role profile and interview. The Appointment Panel will consist of the Chief Fire Officer, Monitoring Officer and Portfolio Holder for Fire and Rescue Services.
- 7.3 Appointments will be for four years (or, in the case of elected members for the remainder of their current term of office) and there will be no limit on the number of times a member of the board can seek to be reappointed.
- 7.4 The two scheme member representatives will be selected to ensure all membership groups within the Fund are considered.

- 7.5 **Appointment of the Chair / Vice Chair** – the Scheme Manager will appoint the Chair and the Vice Chair. The roles will be split with one being a scheme member representative and one being a scheme employer representative and this will be alternated on a two yearly cycle.
- 7.6 Reimbursement of reasonable expenses for attendance at meetings and training sessions will be in line with the Council’s agreed policies and rates for elected members. All such costs will be met directly by Cumbria Fire and Rescue Service.
- 7.7 **Relevant knowledge and capacity** – the Scheme Manager must ensure that each person appointed to the Board has the relevant knowledge and the capacity to represent the employers or members (as appropriate) of the Scheme. Initially this will be done through selection by the Scheme Manager but, following appointment, it is a member’s individual responsibility to ensure they attend sufficient training to enable them to continue to fulfil the experience and capacity requirements. Full training will be provided and all reasonable costs will be met by Cumbria Fire and Rescue Service. To ensure compliance with the above a general level of attendance at meetings and training events is required.

## 8 Substitution

- 8.1 Substitutes are permitted and sufficient substitutes will be appointed to ensure that the representation described in 7.2 can be maintained whenever a substitution is required.
- 8.2 In recognition of the requirements relating to relevant knowledge and capacity, substitutes must be subject to the same appointment process as Board members detailed in 7.2 and the relevant knowledge and capacity requirements as set out at 7.7. Each substitute will be appointed for a four year term (or, in the case of elected members for the remainder of their current term of office) and there is no limit on the number of times the substitute can seek to be reappointed.
- 8.3 Reimbursement of reasonable travel expenses for attendance at meetings and training sessions will be in line with the County Council’s agreed policies and rates for elected members. All such costs will be met directly by the Cumbria Fire and Rescue Service.

## CUMBRIA FIRE LOCAL PENSION BOARD

Minutes of a meeting of the Cumbria Fire Local Pension Board held on Tuesday, 1 February 2022 at 2.00 pm on Microsoft Teams.

### PRESENT:

Mr D Harrison (Chair)

Mr M Nicholson

Mrs J Willis (Vice-Chair)

### Also in Attendance:-

Mr J Beard	-	Chief Fire Officer
Mr A Farrar	-	Democratic Services Officer
Mr P George	-	Group Finance Manager - Pensions, Investments and Insurance
Ms L Taylor	-	Finance Manager - Pensions Investments and Governance
Ms S Sedgwick	-	Senior Advisor Pensions
Ms K Ward	-	Business Partner

### PART 1 – ITEMS CONSIDERED IN THE PRESENCE OF THE PUBLIC AND PRESS

#### 85 APOLOGIES FOR ABSENCE

Apologies were received from Mr A Lamb.

#### 86 MEMBERSHIP AND TERMS OF REFERENCE

The Terms of Reference were noted. There were no changes of membership to note.

#### 87 EXCLUSION OF PRESS AND PUBLIC

**RESOLVED,** that the press and public be excluded from the meeting during consideration of Agenda Item No 9 – Update on Sargeant Remedy and Immediate Detriment, and Agenda Item No 10 – Verbal Update on Emerging Issues by virtue of paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972 as the reports contain information relating to the financial or business affairs of any particular person (including the Authority holding that information).

#### 88 DISCLOSURES OF INTEREST

Mr D Harrison declared a non-pecuniary interest. Sellafield and Cumbria County Council have a contract for which Mr Harrison is the Contract Manager.

## 89 MINUTES

**RESOLVED,** that the minutes of the previous meeting held on 22 October 2021 be agreed as a true and accurate record.

## 90 SCHEDULE OF FUTURE MEETINGS

Members noted that the next scheduled meeting of the Cumbria Fire Local Pension Board would take place as follows:-

- 3 May 2022 at 1pm
- 26 July 2022 at 1pm
- 20 October 2022 at 1pm
- 1 February 2023 at 1pm
- 19 April 2023 at 1pm

## 91 MONITORING REPORT FOR THE PERIOD ENDING 30 SEPTEMBER 2021

Members considered a report from the Chief Fire Officer which advised them of any material risk management, policy or governance issues and national regulatory changes to 30 September 2021 and any performance monitoring issues of the Scheme to 31 December 2021.

The Senior Advisor – Pensions took members through the report, highlighting the following:

- **Risk** - The current risk register had 14 risks comprising 2 red risks (information security arrangements and Sargeant Judgement), 2 amber risks and 10 green risks. No risks had been added or removed from the register. Two risk scores had been amended. The Information Security target score had been adjusted from a likelihood score of 2 “unlikely” to 3 “possible”. The overall target score had increased from 10 to 15. The Sargeant Judgement target score had been increased from 4 “likely” to 5 “very likely) this has increased the score from 12 to 15.
- **LPPA Performance** - In the quarter to 30 September 2021, performance against the KPIs had been 99%, against the SLA target of 95%.
- **Legal breaches**– members noted there were no legal breaches reported to the Pensions Regulator for the quarter to 30 September 2021.
- **Scheme Discretions** – members noted that no scheme discretions had been exercised during the quarter.

- **Pensions Ombudsman** – there had been no cases referred to the Pensions Ombudsman during the period.
- **IDRP** – The Board were updated on a Stage Two Appeal that had been concluded during the quarter. The panel met to review the details of the case, and they agreed the outcome of the Stage 1 appeal was correct but recognised, that the claimant sought further resolution and after further consideration agreed the claimant should be
  - refunded for the cost of applying to the court to have the CCJ removed,
  - interest applied to the original debt should be credited.
  - recognised that the complainant received below standard service and was offered £500 in respect of non-financial injustice.

The Claimant had been notified within the 2 month deadline.

There was also one other stage 2 appeal which was reported to the board last quarter, where the complainant claimed that their pension estimates were incorrect which also affected the tax and NI paid. The decision of the panel was not to uphold the appeal however, the complainant has been offered an amount in respect of non-financial injustice and has now accepted.

- **Data Quality** – The Scheme had benefited from the work undertaken before the pandemic, and data held by the Scheme continued to be of a good quality. Using the scoring mechanism as set out by the Pensions Regulator, the Scheme reported that 98.5% of its common data was present and accurate.
- **Remedy to Sargeant Age Discrimination Case** – There was a separate paper at Item 9 which provided an update on the Sargeant Remedy and Immediate Detriment.
- **Training** – Immediately after the meeting Claire Hey would deliver a training session which provided an update on current issues which included the implications of Sargeant and O'Brien.
- **Local Government Reorganisation** – The Police & Crime Commissioner published a public consultation to gain the views and feedback of staff, public and key partners on future governance of Cumbria Fire and Rescue Service.
- **Other regulatory changes** – There had been no further regulatory changes of note that affected the Fire Pension Scheme since the last meeting of the Board in October 2021.

A member asked if the online Information security training had been rolled out to Members.

The Group Finance Manager - Pensions Investments & Insurance noted that a communication regarding the Information Security training for the current year was expected soon.

The Chair wished to pass on his thanks to the LPPA as their performance had improved again. He noted the IDRPs and commented on the financial payments and asked for clarification as to whether LPPA or Cumbria County Council pay these.

The Group Finance Manager - Pensions Investments & Insurance remarked that the payments were paid by Cumbria Fire & Rescue Service. The administration arrangement with LPPA was on a 'not for profit' basis which was considered more cost effective for Cumbria Fire & Rescue Service than a commercial arrangement that may have covered these occasional costs.

The Senior Advisor – Pensions confirmed that all lessons learned were shared with relevant teams.

**RESOLVED,** that the Cumbria Fire Local Pension Board received and noted the performance of the Cumbria Firefighters' Pension Scheme (FPS) to 30 September 2021 and any material policy or governance issues and national regulatory changes to 31 December 2021.

## **92 DATE AND TIME OF NEXT MEETING**

The next meeting will be held on 3 May 2022 at 2pm.

## **93 UPDATE ON SARGEANT REMEDY AND IMMEDIATE DETRIMENT**

Members considered a report from the Chief Fire Officer which provided the Cumbria Fire Local Pensions Board with an update on the remedy to the unlawful Age Discrimination found by the Court of Appeal, in December 2018. This case related to the transitional protection arrangements offered to some older members of the 1992 and 2006 Fire pensions schemes, when the 2015 Fire Pension Scheme was introduced.

The Government consulted on the various options to remove the discrimination and published their response in February 2021. The Deferred Choice Underpin (DCU) had been confirmed as the remedy, meaning those in scope would have the choice between CARE (reformed) or final salary (legacy) benefits for the remedy period, at the point at which the scheme member retired. The remedy is complex; and the main concern relates to how to deal with those who under the legacy scheme would have an immediate entitlement to pension benefits.

Members were advised that the informal and non-statutory guidance on processing certain kinds of claims that was originally published in August 2020, was withdrawn by the Home Office with immediate effect on 29 November 2021, and the Government advises against processing any cases related to immediate entitlement under the remedy, before the legislation is in place, given the risks and uncertainty involved.

**RESOLVED,** that the Cumbria Fire Local Pensions Board noted the contents of this report.

**94 VERBAL UPDATE ON EMERGING ISSUES**

The Chief Fire Officer updated the Board on current emerging issues, including:-

- Local Government Reorganisation
- Police & Crime Commissioner consultation
- Venues and timings for Future Meetings

The meeting ended at 2.55 pm

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## Cumbria Fire Local Pension Board – Schedule of Future Meetings

Date	Location
Tuesday 26 July 2022 2pm	To be confirmed
Thursday 20 October 2022 2pm	To be confirmed
Wednesday 1 February 2023 2pm	To be confirmed

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<b>CUMBRIA FIRE LOCAL PENSIONS BOARD</b>
<b>Meeting date: 3 May 2022</b>
<b>From: Chief Fire Officer</b>

**MONITORING REPORT FOR THE PERIOD TO 31 DECEMBER 2021**

**1.0 EXECUTIVE SUMMARY**

**1.1 This report advises Cumbria Fire Local Pension Board Members of any material risk management, policy or governance issues and national regulatory changes to 31 March 2022 and any performance monitoring issues of the Scheme to 31 December 2021.**

**Risk Management:**

**1.2 The Cumbria Fire Local Pension Board (the Board) follows accepted best practice across Public Sector Pension Schemes in formally reviewing Scheme risks at every meeting.**

**1.3 The risk register (as presented in Appendix 1) outlines the key risks to the Scheme.**

**1.4 During the quarter one risk has been added to the risk register relating to Fire Governance Transition (LGR), and one risk removed associated with the COVID-19 Impact on Pensions Administration.**

**Pensions Administration:**

**1.5 Performance against key performance indicators for LPPA was 96% (against the SLA of 95%) for the quarter to 31 December 2021.**

**Governance:**

**1.6 There are no legal breaches to report during the period.**

**1.7 There were no discretions exercised during the period.**

## 2.0 STRATEGIC PLANNING AND EQUALITY IMPLICATIONS

- 2.1 *The Council's vision is to be "A Council that works with residents, businesses, communities and other organisations to deliver the best services possible within the available resources". As part of the approach to delivering this vision the Council aims to "Put customers at the heart of everything we do".*
- 2.2 *Good governance and risk management will aid the Council in its role as Scheme Manager in ensuring its regulatory responsibilities are met, a good service is provided to scheme members and costs are controlled. Cost control will have a direct impact on revenue budgets.*
- 2.3 *There are no direct equality implications arising out of the recommendations in this report.*

## 3.0 RECOMMENDATION

- 3.1 *It is recommended that the Cumbria Fire Local Pension Board receive and note the performance of the Cumbria Firefighters' Pension Scheme (FPS) to 31 December 2021 and any material policy or governance issues and national regulatory changes to 31 March 2022.*

## 4.0 RISK

- 4.1 Risk management is a key element of good governance for any organisation. Officers of the Scheme continually review and monitor risks bringing any significant emerging issues to the Board's attention throughout the year, with Members formally reviewing these at each meeting. This quarterly review process ensures consistent and timely Member oversight of risk monitoring and thereby provides enhanced due diligence in this regard.
- 4.2 The current risk register at May 2022 is attached at Appendix 1. One risk has been added to the register between January and May 2022 associated with Fire Governance Transition.

- **New Risk in Q4: Ref 2.7 - Fire Governance Transition**

Impact of occurrence score	4
Likelihood of occurrence score	4
Total Risk Score	16 (Red)

### Fire Governance Transition

Fire pension administration is carried out under Cumbria County Council's delegation to Lancashire County Council. Lancashire have set up Local Pensions Partnership Administration (LPPA) which is their own company to deliver the service. However, LGR means that Cumbria County Council will no longer exist after the 1 April 2023 and therefore the governance arrangements for the Fire Service will need to change.

There is a risk that the transition of Fire governance could have a significant impact on the sustained quality provision of the Cumbria Firefighters' Pension Schemes until 31 March 2023 and potentially beyond. The likelihood score for this risk arising is considered to be 4 ("Likely") and the impact score to be 4 ("Major").

- 4.3 The risk associated with the COVID-19 Impact on Pensions' Administration has been removed from the risk register reflecting that this has been well managed throughout the pandemic and is now being overseen as business as usual.
- 4.4 The register currently has 14 risks comprising 3 red risks (information security arrangements, the Sargeant Judgement and Fire Governance Transition); 2 amber risks (pension administration processes, the O'Brien Judgement), and 9 green risks.
- 4.5 There have been no amendments to the scoring of any of the risks over the last quarter. The risk associated with Fire Governance Transition (LGR) has been added.

## **5.0 SCHEME MONITORING**

### LPPA Performance

- 5.1 To allow members of the Board to perform effective governance and oversight of the Scheme Administration, the quarterly performance report to 31 December 2021 is attached at Appendix 2.
- 5.2 In the quarter to 31 December 2021, performance against the KPIs was 96.5%, against the SLA target of 95%.
- 5.3 LPPA have signed a Pension Scams pledge to help improve how they protect members. The pledge has been set up by The Pensions Regulator and aims to encourage administrators to protect pension scheme Members from scams.

### Legal breaches recorded / reported during the quarter

- 5.4 All individuals with a role in the Scheme have a duty to report breaches of law when they have reasonable cause to believe that a breach of material significance to the Pensions Regulator has taken place. Where a breach is not deemed material there is a requirement to record the breach.
- 5.5 In line with good governance and the Scheme's policy and procedure on reporting breaches of the law, the Fire Local Pension Board are notified of: -
  - all breaches, including those reported to the Pensions Regulator and those unreported, with the associated dates;
  - in relation to each breach, details of what action was taken and the result of any action (where not confidential); and
  - any future actions for the prevention of the breach in question being repeated.

5.6 There have been no breaches reported to the Regulator in the quarter.

Scheme Discretions

5.7 There have been no scheme discretions exercised during the quarter.

Pensions Ombudsman

5.8 There have been no cases referred to the Pensions Ombudsman during the quarter.

IDRP

5.9 During the quarter, no appeals were received.

5.10 A Stage 2 appeal was received in November 2021. The complaint centred around the applicant being served with a County Court Judgement following an overpayment error, made by LPPA which was not subsequently repaid. The complainant claimed they did not receive any correspondence and they were not aware of the attempts to recover the debt. The complainant had several address changes during this period however, they were not identified when the correspondence was sent out. The decision at Stage 1 was to uphold the appeal, and there would be no objection from Cumbria County Council should the complainant decide to apply to the court for the CCJ to be set-aside however, the complainant disputed the Stage 1 decision the reason being, the cost to apply to the court to have the CCJ removed, and the amount of interest applied to the original debt. The Stage 2 panel met and decided that the Stage 1 outcome was correct but recognised, that the claimant sought further resolution. The panel agreed that the claimant should not incur the cost of applying to the court to have the CCJ removed, and the fee should be refunded and that the interest applied to the original debt should be credited. They also recognised that the complainant received below standard service and subsequently offered an amount in respect of non-financial injustice which has been accepted, and the amount has been paid.

5.11 As reported at the previous FLPB meeting a Stage 2 IDRP was being investigated, this complaint was in 2 parts, firstly the complainant claimed there was an error in some of the pension estimates received and they were seeking for their pension to be recalculated based on the 2006 Modified Pension Scheme rules. The second part of the complaint related to the reclaiming of tax and NI. Stage 2 panel met, and the decision was to not uphold the appeal. The panel however, recognised that the complainant received below standard service. The complainant was subsequently offered an amount in respect of non-financial injustice which was accepted, and the amount has been paid.

## Data Quality

- 5.12 Data held within Cumbria FPS continues to be of a good quality. This is evidenced by the scoring mechanism as set out by the Pensions Regulator. The LPPA report in Appendix 2 provides TPR data scoring information at pages 34 & 35. This notes that the Scheme reported 98.5% of its common data (e.g., NI number, address etc.) was present and accurate and the scheme specific conditional data (e.g., employment details, contribution history etc.) was scored as being 96.5% present and accurate, continuing the upward trend.

## **6.0 REGULATORY CHANGES**

- 6.1 This section of the monitoring report provides a summary for Members on recent and proposed future changes to legislation which may impact on the Scheme.

### Remedy to Sargeant Age Discrimination Case

- 6.2 There is a separate paper at Item 10 on today's agenda providing an update on the Sargeant Remedy and Immediate Detriment.

### Matthews – Second options exercise

- 6.3 On 9 March 2022 after an extended period of negotiations a Memorandum of Understanding (MoU) was agreed by Home Office, LGA, FBU and FRSA.
- 6.4 Following this the LGA provided a summary of "Matthew" MoU and second options exercise.
- 6.5 Remedy for retained firefighters affected by the O'Brien judgment will be provided by way of a second options exercise, allowing in-scope individuals the opportunity to purchase pension entitlement as a special member of the FPS 2006.
- 6.6 The regulations to implement the second options exercise in England are still to be drafted by the Home Office and consulted on before they are laid before Parliament. The Home Office has a maximum period of 18 months to draft, consult, and introduce the necessary secondary legislation. FRAs will be expected to start the second options exercise as soon as possible after the legislation comes into force. The exercise will run for a maximum period of 18 months after it begins.
- 6.7 Prior to the legislation coming into force, Cumbria will commence work on gathering all of the relevant data to support this exercise. The Board will be advised of progress with specific reports and verbal updates when appropriate.

### Mandatory scheme pays

- 6.8 Mandatory scheme pays deadlines are changing The Finance Act 2022 and the Registered Pension Schemes (Miscellaneous Amendments) Regulations 2022 ('the new regulations') will change the timescale for members to make

or amend a mandatory scheme pays election when paying an annual allowance charge. The changes will apply when the information used to calculate a member's pension input amount is retrospectively amended. The LGA is currently reviewing the impact of these changes and we will provide more information in due course.

## **Consultations**

### Administration Strategy Consultation

- 6.9 The final template pension administration strategy was published in July 2021. An update on how Cumbria FPS will address this will be presented to a future Local Pension Board meeting.

### Pensions Dashboards – DWP Consultation

- 6.10 In March 2022 the LGA and SAB submitted their responses to the DWP consultation on the draft Pensions Dashboards Regulations 2022 in respect of the Firefighters' Pension Schemes. Whilst supportive of the dashboards and their purpose there are strong concerns over the proposed staging schedule given the conflicting pressures faced by administrator and the data that will be available at that time. Their response to the DWP was to ask for the staging date to be delayed 12 months until April 2025.

## **7.0 OTHER MATTERS**

### **Abatement**

- 7.1 Following the recent Pension Ombudsman ruling – PO25374. The LGA held a dedicated session to Officers on the PO and pension abatement.
- 7.2 To summarise, Pension Ombudsman ruling – PO25374, the FRA identified a re-employed pensioner who should have been abated on reemployment but wasn't and, as a result, an overpayment of pension was identified, which the FRA sought to recover. The member challenged this as they believed that the FRA had a duty of care to alert them at the outset that their pension would be abated.
- 7.3 The complaint was partially upheld. The Ombudsman determined that the FRA didn't have an additional duty of care to the member other than the requirement to provide factually correct information. The complaint was upheld to the extent that the FRA did not follow reasonable process when exercising their discretion under rule K4 of FPS 1992 and making its decision to abate the members pension.
- 7.4 After taking legal advice from the SAB's legal advisor, the response confirmed that the PO determination is correct. The determination is supported by case law on exercising discretions, and the process that should be followed.
- 7.5 The action recommended by the LGA was to review all existing policies on abatement and make necessary changes to ensure that proper



consideration is taken when agreeing whether abatement should apply. It was also recommended that each decision is formally documented to evidence that an informed decision has been made.

- 7.6 The main issue was the FRA had a blanket policy which stipulated abatement would apply. This meant that there was no room for 'discussion' in terms of the circumstances in which abatement would not apply.
- 7.7 A full review has been undertaken of Cumbria's existing policies and no changes were deemed necessary. In abatement cases proper consideration is taken when agreeing whether abatement should apply and consideration whether any exceptional circumstances exist, is done on a case-by-case basis.

### **Training**

- 7.8 Board Members continue to be notified of relevant training events (internal and external) as and when they arise and are encouraged to attend.
- 7.9 There is a development session immediately after today's Board meeting by Rachel Blundell, Deputy Director Member Operations at Local Pensions Partnership Administration. This will provide an update on Project PACE (Pensions Administration Core Evolution), which is the project dealing with LPPA's new pension administration system.
- 7.10 Guidance and training material can be accessed by Board Members via the link below to the dedicated Fire Local Pension Board Sharepoint site: -

<https://cumbria.sharepoint.com/sites/CLGPS/Shared%20Documents/Forms/AllItems.aspx>

### **8.0 OPTIONS**

- 8.1 To either note the performance of the Cumbria Firefighters' Pension Scheme (FPS) to 31 December 2021 and any material policy or governance issues and national regulatory changes to 31 March 2022 or request further information.

### **9.0 RESOURCE AND VALUE FOR MONEY IMPLICATIONS**

- 9.1 The Sargeant ruling has resulted in the new PSPJOA 2022 coming into force on 1 April 2022, but with the changes to the Regulations not yet in place the full extent of these changes and the anticipated increase in costs remains unknown and will only become apparent once a final remedy is in place. The Board will continue to be advised of progress with this valuation through the Monitoring Reports, specific reports, and verbal updates to the Board when appropriate.
- 9.2 The Matthews ruling is expected to result an increase in the cost in the Firefighters' Pension Scheme. The anticipated increase in costs remains unknown at this time.

## 10.0 LEGAL IMPLICATIONS

10.1 The report is for the Board to note and there are therefore no direct legal implications.

## 11.0 CONCLUSION

11.1 To ensure good governance the Scheme must have in place a suite of fit for purpose policies and risk control procedures. Regular scrutiny by this Board will provide challenge and help ensure these stay current and effective.

**John Beard**  
**Chief Fire Officer**

**3 May 2022**

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## APPENDICES

Appendix 1 Cumbria Fire LPB Risk Register at May 2022

Appendix 2 LPPA Quarterly Performance Report to 31 December 2021

Electoral Division(s): All

Executive Decision	<input type="checkbox"/>	No	
Key Decision	<input type="checkbox"/>	No	
If a Key Decision, is the proposal published in the current Forward Plan?	<input type="checkbox"/>		N/A
Is the decision exempt from call-in on grounds of urgency?	<input type="checkbox"/>	No	
If exempt from call-in, has the agreement of the Chair of the relevant Overview and Scrutiny Committee been sought or obtained?	<input type="checkbox"/>		N/A
	<input type="checkbox"/>	No	
Has an environmental or sustainability impact assessment been undertaken?	<input type="checkbox"/>	No	
Has an equality impact assessment been undertaken?	<input type="checkbox"/>	No	

## PREVIOUS RELEVANT COUNCIL OR EXECUTIVE DECISIONS

***No previous relevant decisions.***

## **REPORT AUTHOR**

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Finance Directorate

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# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

7	RISKS	Dec 2021	May 2022	Target	DOT	CORPORATE RISK PROFILE (Risk Score = Likelihood x Impact)																																																
1	1.1. Information security arrangements	15	15	15	→	<table border="1"> <thead> <tr> <th>Impact Likelihood</th> <th>1 Insignificant</th> <th>2 Minor</th> <th>3 Moderate</th> <th>4 Major</th> <th>5 Most severe</th> </tr> </thead> <tbody> <tr> <td>5 Very Likely</td> <td></td> <td></td> <td>1.6</td> <td></td> <td></td> </tr> <tr> <td>4 Likely</td> <td></td> <td></td> <td></td> <td>2.7</td> <td></td> </tr> <tr> <td>3 Possible</td> <td></td> <td>2.3</td> <td>1.2</td> <td>1.7</td> <td>1.1</td> </tr> <tr> <td>2 Unlikely</td> <td></td> <td>1.3; 2.4; 2.5</td> <td>1.4</td> <td>1.5; 2.2</td> <td></td> </tr> <tr> <td>1 Very unlikely</td> <td></td> <td></td> <td></td> <td>2.6</td> <td>2.1</td> </tr> <tr> <td colspan="3">Summary of risk changes since last reported</td> <td colspan="3">Emerging Risks</td> </tr> <tr> <td colspan="3"> <ul style="list-style-type: none"> <li>One risk has been removed (Covid-19 Impact on Pensions Admin) and one risk 2.7 Fire Governance Transition (LGR) has changed from being an emerging to a current risk, during the quarter.</li> </ul> </td> <td colspan="3"> <ul style="list-style-type: none"> <li>1.6 There continues to be an emerging risk related to the as yet unknown implications of Sargeant on the liabilities and the impact this may have on employer contributions in the future. This risk is being managed and is being kept under review.</li> </ul> </td> </tr> </tbody> </table>	Impact Likelihood	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Most severe	5 Very Likely			1.6			4 Likely				2.7		3 Possible		2.3	1.2	1.7	1.1	2 Unlikely		1.3; 2.4; 2.5	1.4	1.5; 2.2		1 Very unlikely				2.6	2.1	Summary of risk changes since last reported			Emerging Risks			<ul style="list-style-type: none"> <li>One risk has been removed (Covid-19 Impact on Pensions Admin) and one risk 2.7 Fire Governance Transition (LGR) has changed from being an emerging to a current risk, during the quarter.</li> </ul>			<ul style="list-style-type: none"> <li>1.6 There continues to be an emerging risk related to the as yet unknown implications of Sargeant on the liabilities and the impact this may have on employer contributions in the future. This risk is being managed and is being kept under review.</li> </ul>		
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2	1.2. Pensions administration processes	9	9	6	→																																																	
3	1.3. Scheme member communication	4	4	4	→																																																	
4	1.4. Data quality	6	6	3	→																																																	
5	1.5. Payment of contributions	8	8	8	→																																																	
6	1.6 Sargeant Judgement	15	15	9	→																																																	
6	1.7 O'Brien Judgement (also known as Matthews)	12	12	9	→																																																	
8	2.1. Pension Regulator Intervention	5	5	5	→																																																	
9	2.2. Regulatory changes	8	8	8	→																																																	
10	2.3. Financial irregularity	6	6	6	→																																																	
11	2.4 Loss of key personnel	4	4	4	→																																																	
12	2.5. Conflicts of Interest	4	4	4	→																																																	
13	2.6 Operational disaster	4	4	4	→																																																	
14	2.7 Fire Governance Transition	n/a	16	6	new																																																	

**CUMBRIA FIREFIGHTERS’ PENSION BOARD RISK REGISTER (May 2022)**

1. Scheme Administration

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
1.1  30	Scheme Manager & LPPA	<p><b>Information Security Arrangements</b></p> <p>There is a risk that the Council will experience a significant information security incident.</p> <p>Caused by a concerted cyber attack on Council or LPPA systems, inadequate information security arrangements, lack of training, awareness or human error.</p> <p>Resulting in partial or total interruption to service delivery to scheme members, the scheme employer, Scheme Officers or LPPA.</p> <p>Disclosure of personal data or a data breach leading to financial penalties, liability claims and reputational damage</p>	<p>15 (5x3)</p> <p>DOT</p> <p>➔</p>	<p>15 (5x3)</p> <p>Previously 10 (5x2)</p>	<p><b>Cumbria County Council (CCC) – Corporate Risk</b></p> <ul style="list-style-type: none"> <li>The County Council maintains a detailed corporate risk register including the risk associated with Information Security Arrangements.</li> <li>The Scheme adheres to the controls and measures in place detailed within the Corporate Risk Register.</li> <li>All staff within the team have completed the GDPR &amp; Information Security e-learning training which is renewed on an annual basis. All Members have received training on information security.</li> <li>The Scheme Manager is compliant with the requirements of GDPR.</li> <li>Any data breaches by officers within the scheme are reported through the Council’s data breach processes and also recorded on the Scheme’s breach register.</li> <li>In the event of systems being interrupted, the Council will implement the relevant Business Continuity Plan to ensure service continuity in a timely manner.</li> <li>Information security controls within the Council have strengthened and have been independently assessed in the following three areas:                             <ul style="list-style-type: none"> <li>GDPR: ‘Substantial Assurance’ Internal Audit opinion June 2019.</li> <li>Cyber Security: ‘Reasonable Assurance’ Internal Audit opinion June 2019.</li> <li>PSN: Annual Independent PSN Accreditation</li> </ul> </li> </ul>	<p><b>Cumbria County Council</b></p> <ul style="list-style-type: none"> <li>All staff elected Members and Pension Board members are required to complete on-line data security training with a new module launched in 2021/22.</li> </ul> <p><b>Local Pension Partnership (LPP):</b></p> <ul style="list-style-type: none"> <li>Activities are underway to refresh the Group’s Cyber Essentials certification together with obtaining Cyber Essentials Plus certification.</li> <li>LPP’s ‘Secure-Score’ is currently delivering improvements, primarily delivered through:                             <ul style="list-style-type: none"> <li>Increased monitoring alerts and notifications of cyber security events, through use of Microsoft Identity monitoring &amp; Cloud Application Security tooling.</li> <li>Introduction of control policies which manage detection of unsanctioned applications.</li> <li>Reviews of administrative privileges &amp; compliance to Multi Factor Authentication (MFA) Policies.</li> </ul> </li> </ul>

# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
31					<p>confirmed July 2019.</p> <ul style="list-style-type: none"> <li>The annual 2021 ICT health check has been successfully completed during July 2021. The report will be submitted in support of the PSN accreditation process during January 2022.</li> <li>All National Cyber Security Centre (NCSC) configuration guidance is adhered to where appropriate and assured as part of the PSN process.</li> <li>All NCSC cyber monitoring tools are implemented.</li> <li>in the event of a Cyber Attack Council will notify the appropriate government agencies (Action Fraud and National Cyber Security Centre (NCSC)) and their guidance will be adhered to. The Scheme would never make any payment to a third-party claiming responsibility for breaching the Scheme's security arrangements.</li> </ul> <p><b><u>Local Pension Partnership Administration (LPPA):</u></b></p> <ul style="list-style-type: none"> <li>Cyber security risks and controls in place</li> <li>Services are backed up to tape every night and held off site. Disaster Recovery Plan is tested twice yearly.</li> <li>Networks protected by fire walls to prevent unauthorised access. Intrusion Prevention Systems in place and penetration tests completed annually.</li> </ul>	
1.2	Scheme Manager & LPPA	<p><b>Pension Administration Processes</b></p> <p>There is a risk of delays in scheme members entering</p>	9 (3x3)	6 (3x2)	Formal agreement in place with Lancashire County Council for the discharge of pension administration functions through the Local Pensions Partnership Administration (LPPA). This confirms Lancashire will	Officers continue to closely review LPPA performance specifically with regard to the experience received by scheme members.

# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
32		<p>into pension or receiving other services from the scheme in an untimely manner.</p> <p>Caused by organisational restructure within LPPA &amp; personnel changes and the need for retraining.</p> <p>Resulting in customer dissatisfaction with the service.</p>	<p><b>DOT</b></p> <p>➔</p>		<p>exercise the same skill, care and diligence they would apply to the discharge of their own functions in relation to the administration of pensions.</p> <p>Formal quarterly meetings of LPPA and Cumbria pensions officers to review and consider standards of service provision against LPPA internal KPIs. Regular (at least quarterly meeting) of operational group and ongoing dialogue with officers at LPPA throughout the year. LPPA host an annual Client Forum providing officers the opportunity to engage with representatives from other Schemes with LPPA as their pensions' administrator.</p> <p>Internal audit assurance is provided annually by Lancashire County Council that internal controls with LPPA over the operation and administration of Cumbria Fire Service Pension Scheme data are adequate and effective.</p> <p>LPPA also maintain their own Internal Audit programme and advise Officers of the findings of these reports.</p>	<p>Specific issues relating to COVID-19 are addressed in risk 1.7 – “COVID-19 – Impact on Pensions’ Administration”.</p> <p>The most recent Performance report showed performance levels of 96% against a 95% target, for the quarter.</p>
	1.3	Scheme Manager & LPPA	<p><b>Scheme Member Communication</b></p> <p>There is a risk that scheme members will not receive appropriate or effectively communications from the scheme manager.</p> <p>Caused by not having an effective Communication</p>	<p>4 (2x2)</p> <p><b>DOT</b></p> <p>➔</p>	4 (2x2)	<p>LPPA provide the Scheme’s communication with scheme members.</p> <p>The ‘My Pension On-Line’ (MPO) tool is a key mechanism through which LPPA communicates with members and work is ongoing to increase the percentage of members signing up to this.</p> <p>LPPA have confirmed that 100% of ABS’s were issued</p>



# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
33		<p>Strategy in place or engagement strategy or inaccurate / incomplete data.</p> <p>Resulting in customer dissatisfaction and non-compliance with the Pension Regulator's Code of Practice 14.</p>			in advance of the statutory deadline of 31st August 2021.	
	1.4	Scheme Manager	<p><b>Data Quality</b></p> <p>There is a risk that member data is incomplete or inaccurate.</p> <p>This could be caused by poor internal controls within the scheme and the employer with information not being passed to LPPA in a timely manner.</p> <p>This could result in having an impact on the production of Annual Benefit Statements for scheme members.</p>	<p>6</p> <p>(3 x 2)</p> <p>DOT</p> <p>➔</p>	<p>3</p> <p>(3 x 1)</p>	<p>Internal audit work undertaken on LPPA controls to provide assurance that internal controls over the operation and administration Cumbria's data are adequate and effective (annually).</p> <p>Monthly reconciliation of employer contributions to data submitted by the employer.</p> <p>Quarterly LPPA key performance indicators include measures of timeliness of update of records.</p> <p>The quarterly LPPA report to December 2021, reports data quality of 98.5% for common data and 96.5% for scheme-specific data (a result in line with other Firefighters' Pension schemes).</p> <p>Employer responsibilities are reinforced by officers through a range of communication channels with the employee/scheme member.</p>

# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
1.5  34	Scheme Employer & Scheme Manager	<p><b>Payment of contributions</b></p> <p>There is a risk that employer fails to pay contributions (or the correct level of contributions) into the scheme.</p> <p>This could be caused by employer error, business failure or the general impact of increases in employer contribution rates</p> <p>This could constitute a breach reportable to the Pensions Regulator.</p>	<p>8</p> <p>(4 x 2)</p> <p>DOT</p> <p>➔</p>	<p>8</p> <p>(4 x 2)</p>	<p>Monthly monitoring and reconciliation of contribution payments is undertaken by Scheme Manager to ensure contributions received are timely and accurate. This reconciliation is considered as part of the annual audit process.</p>	<p>Monitoring and reconciliation of contributions continue to be undertaken monthly and a full reconciliation is completed and checked as part of the year end process.</p>
1.6	Scheme Employer & Scheme Manager	<p><b>Sargeant Judgement</b></p> <p>This judgement relates to transitional arrangements introduced as part of the 2015 reforms which were discriminatory and, therefore unlawful. The risk is that agreeing to any remedy to remove the discrimination to affected members ahead of legislation may have unintended consequences and significant financial</p>	<p>15</p> <p>(3 x 5)</p> <p>DOT</p> <p>➔</p>	<p>9</p> <p>(3 x 3)</p>	<p>The governance issues have been considered and the Section 151 Officer has been given the delegated authority to make decisions on the implementation of immediate detriment. A report was written providing information on the remedy and immediate detriment cases and the recommendation not to process ID cases at this time, with a further review within 3 months was agreed.</p> <p>Officers will continue to monitor this situation, liaising with the LGA, LPPA and other FRAs to keep up to date with latest advice and guidance.</p> <p>The Scheme will be discussing this issue with LPPA through its usual monitoring meetings and will be making preparations for managing the additional</p>	<p>The Scheme is continuing to monitor announcements relating to Sargeant.</p> <p>Officers will continue to provide the Section 151 Officer with relevant up to date information in relation to Firefighter pensions and Immediate Detriment (ID) cases affected by the Sargeant / McCloud judgement and the subsequent remedy.</p> <p>The Scheme will be working closely with LPPA to identify what additional workload is required.</p> <p>Planned improvements will be reported to the Fire Local Pension Board when there is greater clarity as to what is required from the Scheme.</p>

# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
35		<p>impact including tax liabilities.</p> <p>The risk is compounded by insufficient budget to fund the required remedy and any associated project work costs. There is a risk of legal breaches reportable to the Pensions Regulator; incorrect pension entitlements being calculated for pensioners; and loss of credibility with scheme members and employer.</p> <p>There is also a risk of the FBU issuing legal proceedings against the FRA if we do not process ID cases.</p>			<p>workloads. This is likely to have an impact on the Pensions Administration budget however it is not expected that any material additional costs will be incurred until 2022/23.</p> <p>Officers are continuing open communication with the FBU, and other trade unions, regarding the current position and latest advice and guidance.</p>	<p>Officers are currently reviewing the quality of data held by LPPA to assist in managing the risk of incorrect pension entitlements being calculated for pensioners; and loss of credibility with scheme members.</p>
	1.7	Scheme Employer & Scheme Manager	<p><b>O'Brien/Matthews Judgement</b></p> <p>This judgement relates to pre 2000 service, for part-time service. The risk is that we are unable to, adequately determine employment history, pensionable service and levels of contributions</p>	<p>12</p> <p>(3 x 4)</p>	<p>9</p> <p>(3 x 3)</p>	<p>This is a developing risk and the Scheme will be monitoring announcements from the Fire Scheme Advisory Board as to what additional information is required from the employer and the additional workstreams for the Scheme and LPPA.</p> <p>A Memorandum of Understanding was agreed by the HO LGA, FBU &amp; FRSA, following which the LGA provided a summary of the MoU and the second options exercise.</p>

# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
36		<p>required to comply with required administration processes.</p> <p>This could be caused by employer not having historic employment data for affected members; LPPA/the employer not having appropriate resource to undertake the work; the Scheme having insufficiently capacity to adequately review the results; or insufficient budget to fund the required project work.</p> <p>This could result in legal breaches reportable to the Pensions Regulator; incorrect pension entitlements being calculated and loss of credibility with scheme members and employer.</p>			<p>The Scheme will be discussing this issue with LPPA/LGA through its usual meetings, as and when information is provided from central government. Only then can a full impact analysis be undertaken.</p>	<p>Officers are currently reviewing the quality of the data retained by CFRS from the FPS 2006 (special members) first options exercise. Following this, steps will be taken to identify those in scope for the second options exercise. A series of data checks will be undertaken, working in partnership with stakeholders to mitigate the risk of loss of credibility with scheme members.</p>

# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

## 2. Governance & Regulation

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
2.1	Scheme Manager	<p><b>Pensions Regulator Intervention</b></p> <p>There is a risk that the Scheme commits a serious regulatory breach</p> <p>This could be caused by the Scheme failing to advise the Regulator of regulatory matter (e.g. reporting a breach, submitting the Scheme Return) or failing to implement new regulations.</p> <p>This could result in a detrimental effect to the service being provided to scheme members and the employer. It could also result in serious reputational implications for the Scheme Manager and potentially a financial penalty.</p>	5 (5x1) DOT →	5 (5x1)	<p>The Scheme Manager is appropriately resourced (following the recent recruitment to the post of Senior Advisor – Pensions) with well trained and knowledgeable staff who understand their regulatory obligations to the Pensions Regulator and other statutory bodies.</p> <p>The Scheme Manager ensures that staff take the time to consider upcoming deadlines and prioritise workloads accordingly.</p> <p>The Scheme has good contacts with other Scheme Managers, the LGA, CIPFA and other bodies to ensure that it is aware of changing regulations and their impact to the Scheme.</p> <p>The Fire Local Pension Board is advised on new regulations and emerging issues at each meeting.</p> <p>The Pensions Regulator is maintaining a focus on all Public Sector pension schemes and is beginning to levy its first fines for failure to meet regulatory obligations. The Pensions Regulator has also noted that it will be more proactive in enforcing regulations in the future.</p>	<p>Officers will continue to “horizon scan” to understand emerging issues that may have an impact on the future of the Scheme. Where appropriate, the Fire Local Pension Board will continue to be appraised of any emerging issues.</p> <p>The Scheme undertakes an annual assessment of training needs of each Member. The results of this assessment inform the Training Plan for the Scheme.</p> <p>Officers will arrange for high quality training to be available to all members Fire Local Pension Board throughout the year to ensure that Members have the appropriate skills and knowledge to take informed decisions at each meeting.</p>
2.2	Scheme Manager	<p><b>Regulatory Changes</b></p> <p>There is a risk that the Scheme is mandated to</p>	8	8	<p>Officers of the Scheme Manager respond to government consultations where relevant to help influence policy.</p>	<p>Officers of the Scheme Manager will continue to monitor the regulatory environment to be aware of any potential changes to the scheme.</p>

# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
38		<p>change the benefits payable under the Scheme or other such regulatory change.</p> <p>This may be caused by government policy or amendments to regulations.</p> <p>This may result in the costing of the scheme being affected which could materially impact employer contributions.</p>	<p>(4 x 2)</p> <p>DOT</p> <p>➔</p>	<p>(4 x 2)</p>	<p>Where relevant, the Scheme Manager will support lobbying or lobby directly to ensure that its voice is heard in the development of national policy.</p> <p>Officers within the Scheme ensure that they are aware of impending amendments to regulations and advise the Fire Local Pension Board (and, where relevant, the employer and scheme members) in a timely way as to any amendments and their impact to the Scheme.</p>	<p>Where appropriate, officers will draft responses to consultations affecting the Scheme and consult with the Chair of the Fire Local Pension Board before submission.</p>
2.3	Scheme Manager	<p><b>Financial Irregularity</b></p> <p>There is a risk of fraud, fraudulent behaviour, or unintentional overpayments. This may be caused by fraudulent activity or misunderstanding.</p> <p>Failure to address financial irregularity may result in a financial loss to the Scheme Manager or employer, as well as reputational damage to the Council.</p>	<p>6</p> <p>(2 x 3)</p> <p>DOT</p> <p>➔</p>	<p>6</p> <p>(2 x 3)</p>	<p><b>Fraudulent Activity</b> – Active participation in the National Fraud Initiative reduces likelihood of unidentified deaths and fraudulent pension claims.</p> <p>Segregation of duties and a delegated scheme of authority minimises the risk of fraud within the Scheme.</p> <p><b>Unintentional overpayments</b> – The NFI activity may identify overpayments where no fraudulent activity has arisen, but a benefactor has unintentionally benefited from the Scheme, e.g. payments continuing to be made to a widow(er) following the death of their partner. In such instance's officers act compassionately.</p>	<p>Officers conducted a review of data from the National Fraud Initiative in 2021, and there are no outstanding issues. The next set of results from this biennial exercise are expected in early 2023.</p>

# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
2.4	Scheme Manager	<p><b>Loss of key personnel</b></p> <p>There is a risk that the scheme manager may lose key personnel.</p> <p>This risk could be caused by staff retiring, moving on or otherwise being on long-term absence.</p> <p>This could result in an erosion of skills and knowledge within the scheme manager.</p>	<p>4</p> <p>(2 x 2)</p> <p>DOT</p> <p>➔</p>	<p>4</p> <p>(2 x 2)</p>	<p>The Scheme Manager is appropriately resourced and has effective arrangements in place to cover for short term absence. Managers consider succession planning for key staff within the team.</p> <p>A comprehensive skills needs assessment is undertaken for all Officers and Members of the Fire Local Pension Board on a regular basis and a training plan developed to address any areas for improvement.</p>	<p>The Scheme Manager will continue to consider succession planning arrangements in the event of loss of key personnel.</p> <p>An internal appointment within the team has given scope to help mitigate this risk.</p> <p>The training plan is approved by the Board.</p>
2.5	Scheme Manager	<p><b>Conflicts of interest</b></p> <p>There is a risk that conflicts of interest in the governance of the Scheme may detrimentally affect decision making.</p> <p>This could be caused by those involved with the governance of the Scheme being influenced by interests outside of the Scheme.</p> <p>This could result in decisions being taken that are detrimental to the</p>	<p>4</p> <p>(2 x 2)</p> <p>DOT</p> <p>➔</p>	<p>4</p> <p>(2 x 2)</p>	<p><b>Fire Local Pension Board:</b> all members have signed up to the Board's Code of Conduct and Conflicts of interest policy (which are aligned to those of the Council). At each meeting, members are asked to disclose any changes to their situation.</p> <p>All interests are recorded and published on the Council's website.</p> <p>If appropriate legal advice can be sought as to any potential conflicts of interest within the Scheme.</p>	<p>The existing procedures are considered appropriate to mitigate the risk of conflicts of interest, but this position will be kept under review.</p> <p>Any potential conflicts of interest are declared at the commencement of each meeting and these are declarations are included in the minutes of each meeting.</p> <p>All members of the Fire Local Pension Board are aware of how to manage potential conflicts. If there is doubt members of the Board may seek advice from the respective Chair or the Council's Monitoring Officer.</p>

# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
		Scheme Manager or the Council.				
2.6	Scheme Manager & LPPA	<p><b>Operational Disaster</b></p> <p>There is a risk that an operational disaster may impact onto the Scheme.</p> <p>This could be caused by fire / flood / extreme weather events etc.</p> <p>This could result in the Scheme not being able to operate effectively.</p>	<p>4</p> <p>(4 x 1)</p> <p>DOT</p> <p>➔</p>	4	<p>(4 x 1)</p> <p>Where weaknesses are identified, these are addressed appropriately in order to improve the Scheme's preparedness for operational disaster.</p> <p><b>Administration (LPPA):</b> LPPA have business continuity procedures in place for Pensions administration. These are reviewed by Lancashire County Council's emergency planning services which provide a QA function by in respect of individual service plans.</p>	The existing procedures are considered appropriate to mitigate the risk of operational disaster, but this position will be kept under review.
40						
2.7	Scheme Manager	<p><b>Fire Governance Transition</b></p> <p>There is a risk that the transition of Fire governance (either through LGR or the PCC) could have a significant impact on the sustained quality provision of the Cumbria Firefighters' Pension Schemes until 31 March</p>	<p>16</p> <p>(4 x 4)</p> <p>New Risk</p>	6	<p>(3 x 2)</p> <p>Throughout the transition process, the focus is on ensuring high quality provision is maintained through its most important services of:</p> <ul style="list-style-type: none"> <li>• Paying pensions;</li> <li>• Collecting contributions; and</li> <li>• Adhering to regulatory requirements.</li> </ul>	<p>Continue to work closely with key stakeholders including LPPA, identifying administration contract issues and developing plans to secure on going Fire pension administration in the short term.</p> <p>This needs to be a consideration to ensure that key skills are not lost through the transition of Fire Governance.</p>



# Cumbria Fire Local Pension Board Risk Register at May 2022

# Appendix 1

Risk Ref	Risk Owner	Risk Title & Description	Current Risk Score DOT	Target Score	Current Controls & Measures in Place	Planned Improvements to controls and measures to manage the risk
			(Impact x Likelihood)			
41		<p>2023 and potentially beyond.</p> <p>The retention of skilled staff.</p> <p>This could be caused by increased workload pressures on key staff with key areas of work including identifying and assessing options for the governance arrangements for the Fund post vesting date; and ensuring arrangements are in place for the continuation of key externally provided services e.g. banking and pensions administration.</p>				

**Note:** An upward arrow on the Direction of Travel represents an increase in the risk score since the previous quarter – hence either the potential impact or the likelihood of the risk occurring has increased.

Similarly, a downward arrow on the Direction of Travel represents a decrease in the risk score since the previous quarter – hence either the potential impact or the likelihood of the risk occurring has decreased.

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# LPP

Local Pensions Partnership  
Administration



Cumbria Fire & Rescue  
Service

## Quarterly Administration Report

1st October – 31st December 2021

[lppapensions.co.uk](http://lppapensions.co.uk)

# Contents

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# Definitions

Page 7

## **Total Fund Membership**

Total Fund Membership is the number of Member records held on the LPPA pensions administration system that are contributing to, awaiting benefits, or receiving benefits from the pension fund.

## **Current age demographic**

The age profile of the Membership is split across three types of status:

**Active Members** – Members who are currently contributing toward their pension benefits.

**Deferred Members** – Members who hold a deferred benefit in the fund.

**Pensioner Members** – Pensioners and Dependants who are currently receiving a pension.

Page 10

## **Casework Performance Against SLA**

Performance is measured once all information is made available to LPPA, to enable them to complete the process. All casework has a target timescale in which to complete the process, and performance is measured as the % of cases that have been completed within that timescale.

Page 11 & 12

## **Casework Performance Against SLA**

The category of 'Other' on this page covers cases including, but not limited to:

- Benefit revisions
- Maternity/paternity cases
- Ill Health cases
- Scheme Opt-Out cases
- Cases raised to cover 'My Pension Online' registration queries
- P60 queries
- 50/50 scheme changes
- APC queries

Please note the number of cases brought forward, does not match the corresponding number of outstanding cases reported in the previous quarter (due to reasons including the deletion of cases during the current reporting period).

Page 14

## **Elapsed Times**

Elapsed days represent the total number of working days between the case being set up, and when it was completed by LPPA.

Page 16-19

## **Helpdesk Performance**

Average wait time measures the time taken from the caller being placed into the queue, to them speaking with a Helpdesk adviser.

The percentage of calls answered does not include calls that are abandoned by the caller where the wait time is less than 2 minutes.

The Annual Calls answered performance figures are not Client specific (as we are unable to measure abandoned calls by Client).

A 'resolved' call or email requires no further action, as the enquiry has been answered in full. Any that are 'unresolved' will require an action of either a case or chase case to be created, or documents that need to be added to an existing case.

As the needs of our business, Clients and Members change, we adapt our reporting to suit the current trends and ensure sight of common topics. For this reason it is necessary to update and add new topics in the reason for calls. To accommodate the multitude of reasons we have created a "Other" category which includes (but not limited to) 'Information Only', 'Website', 'Resend Documents'.

Page 21 & 22

## **Customer Satisfaction Scores**

The Helpdesk satisfaction scores (telephone and retirement) are the percentage of people who completed the survey with a satisfied (green) or neutral (amber) response. The Retirement satisfaction score illustrates the total surveys taken, split by response of Dissatisfied or Satisfied.

Page 24

## **My Pension Online (MPO)**

The number and % of Members who have signed up to "My Pension Online" (online Member portal), including a quarterly view and a comparison with the overall LPPA sign up rate (all Members).

Page 25

## **My Pension Online (MPO)**

The number of Members that are registered for My Pension Online, split by Member status and age profile.

Page 27 & 28

## **Telephone Numbers**

The number and % of telephone numbers held by Member status (this is important as LPPA use telephone contact details where possible to reduce elapsed times).

## **Existing e-mail addresses**

The number and % of emails held by Member status (this is important as LPPA utilise email as the preferred method of written communication).

## **E-Communications Opt-outs**

The number and % of Members who have chosen not to receive email communications.

Page 34 & 35

## **Common/Conditional Data Fails**

The Pension Regulator requires Administrators to keep Member data up to date to ensure benefits are accurately paid. This is split by Common Data (details that are specific to the Member) and Conditional Data (data that is related to the pension).

Individual Fails shows the total number of unique Members that have a single or multiple number of Common Data or Conditional Data fails. On both charts, the Accuracy Rate (%) then compares the number of Individual Fails to the total number of Scheme Members.

For more detail on the Data Items / Error types presented in these charts, please visit either the [TPR](#) or [PASA](#) (The Pension Administration Standards Association) websites.

# Our Core Values

This administration report is produced in accordance with the Service Level Agreement (SLA) for the provision of pension administration services.

The report describes the performance of Local Pensions Partnership Administration (LPPA) against the standards set out in the SLA.

Within LPPA, our values play a fundamental role in guiding our behaviour as we grow our pensions services business and share the benefits with our Clients.

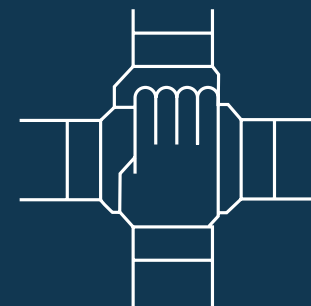


# Annual Plan 2021/22

✓ COMPLETED    📅 DUE

47

	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22
Annual Benefit Statement and Newsletter to Deferred Members			✓									
Pension Increases		✓										
P60s and Newsletter to Pensioners		✓										
Annual Benefit Statement and Newsletter to Active Members			✓									
Pension Saving Statements							✓					
HMRC Scheme Returns							✓					



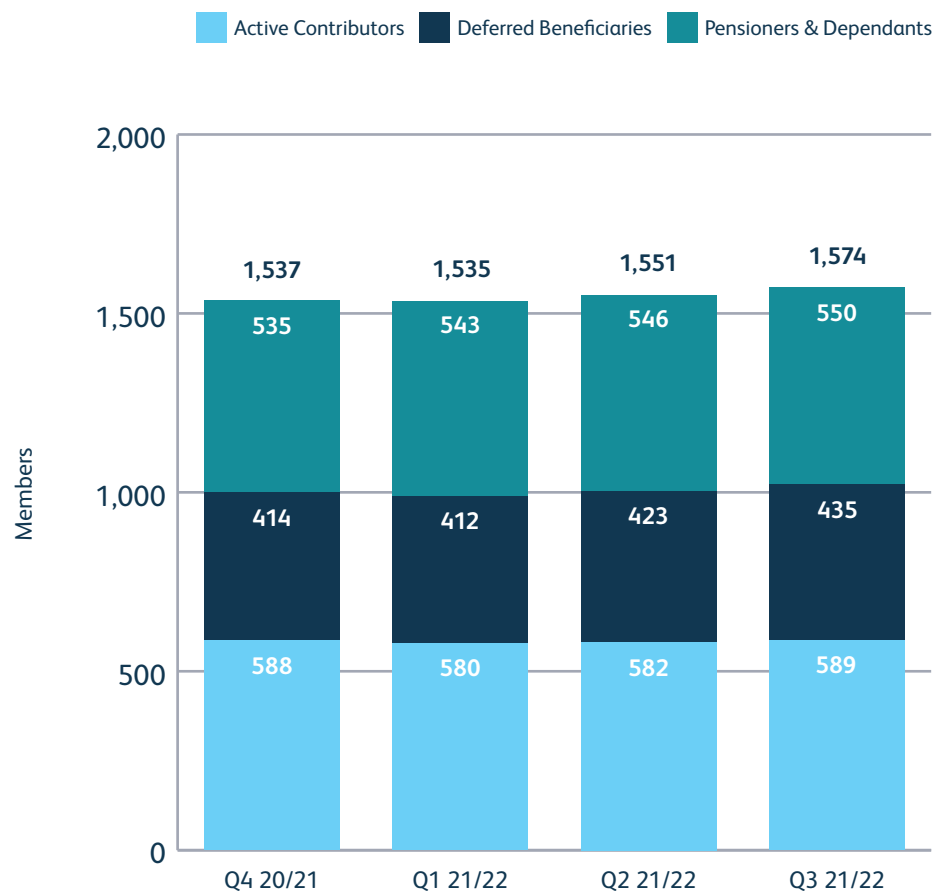
Working Together

# Fund Membership

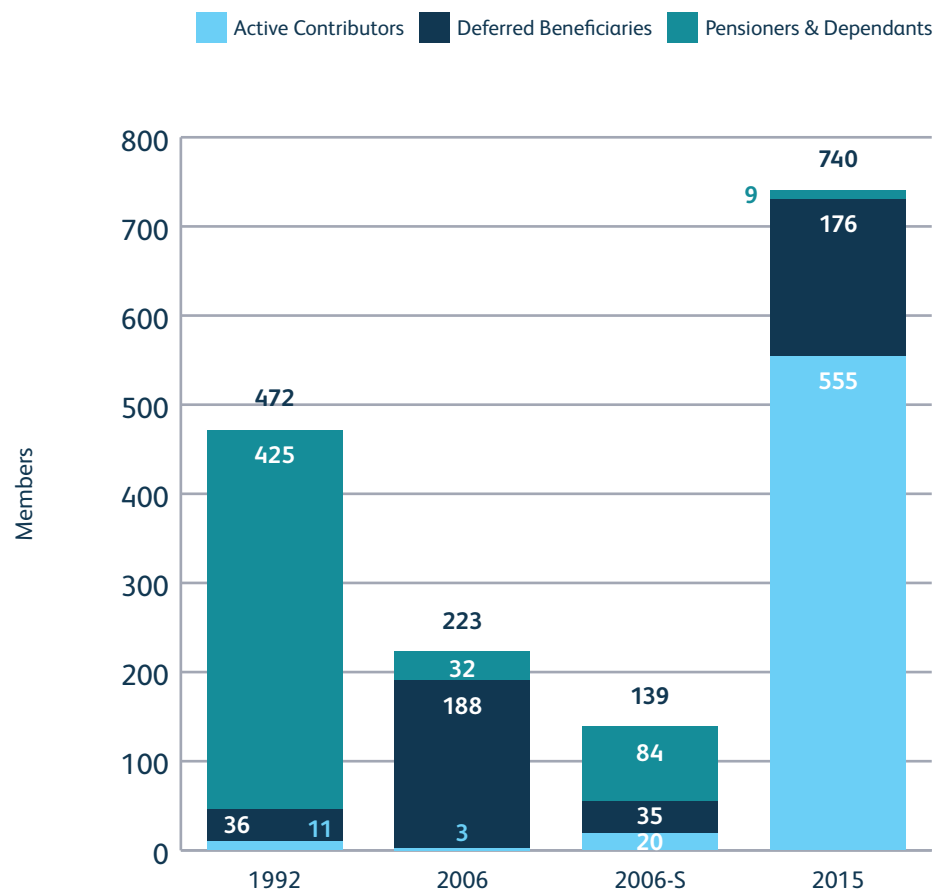


# Fund Membership

## TOTAL FUND MEMBERSHIP

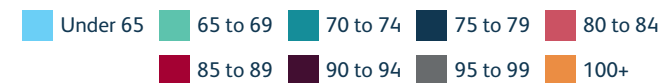
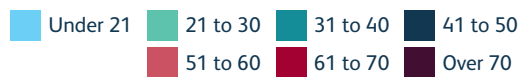


## QUARTERLY SCHEME BREAKDOWN

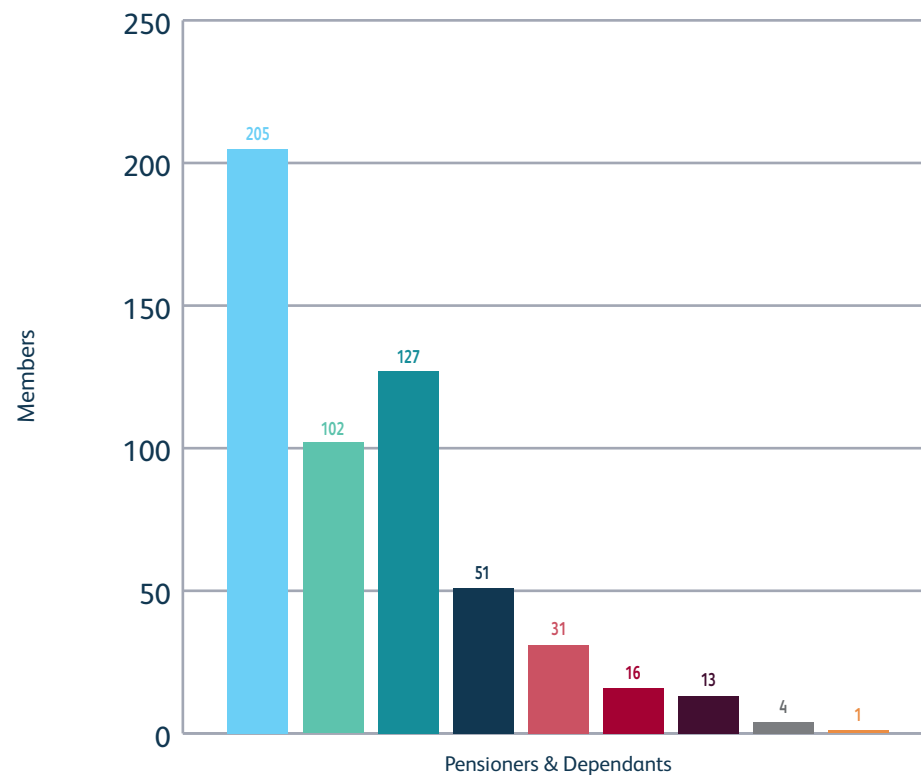
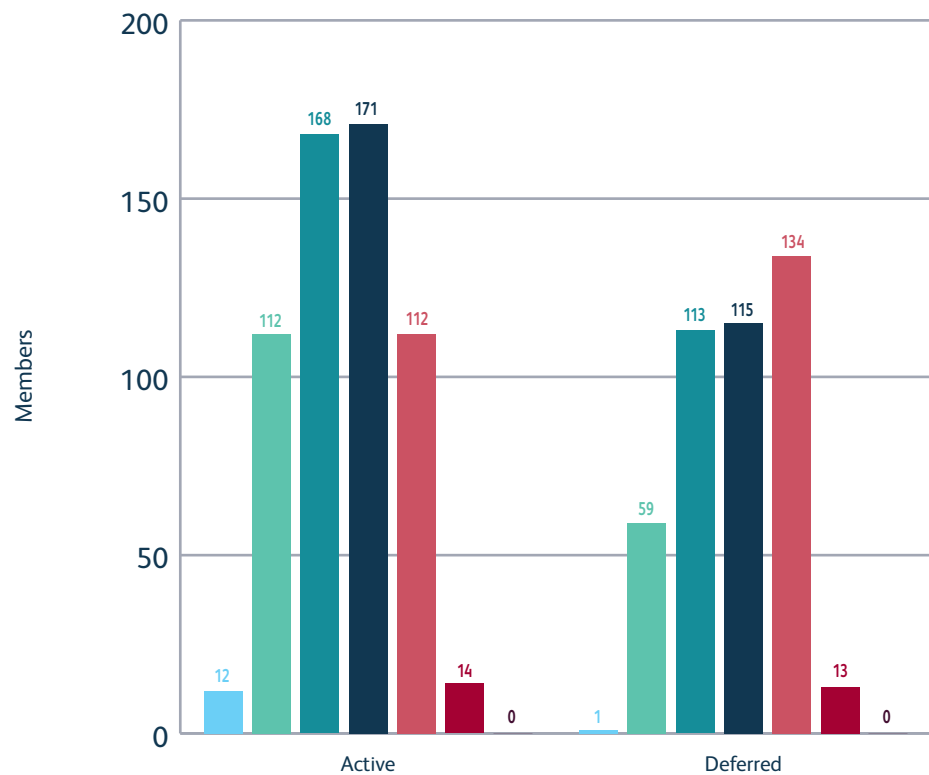


# Fund Membership

## CURRENT AGE DEMOGRAPHIC



50





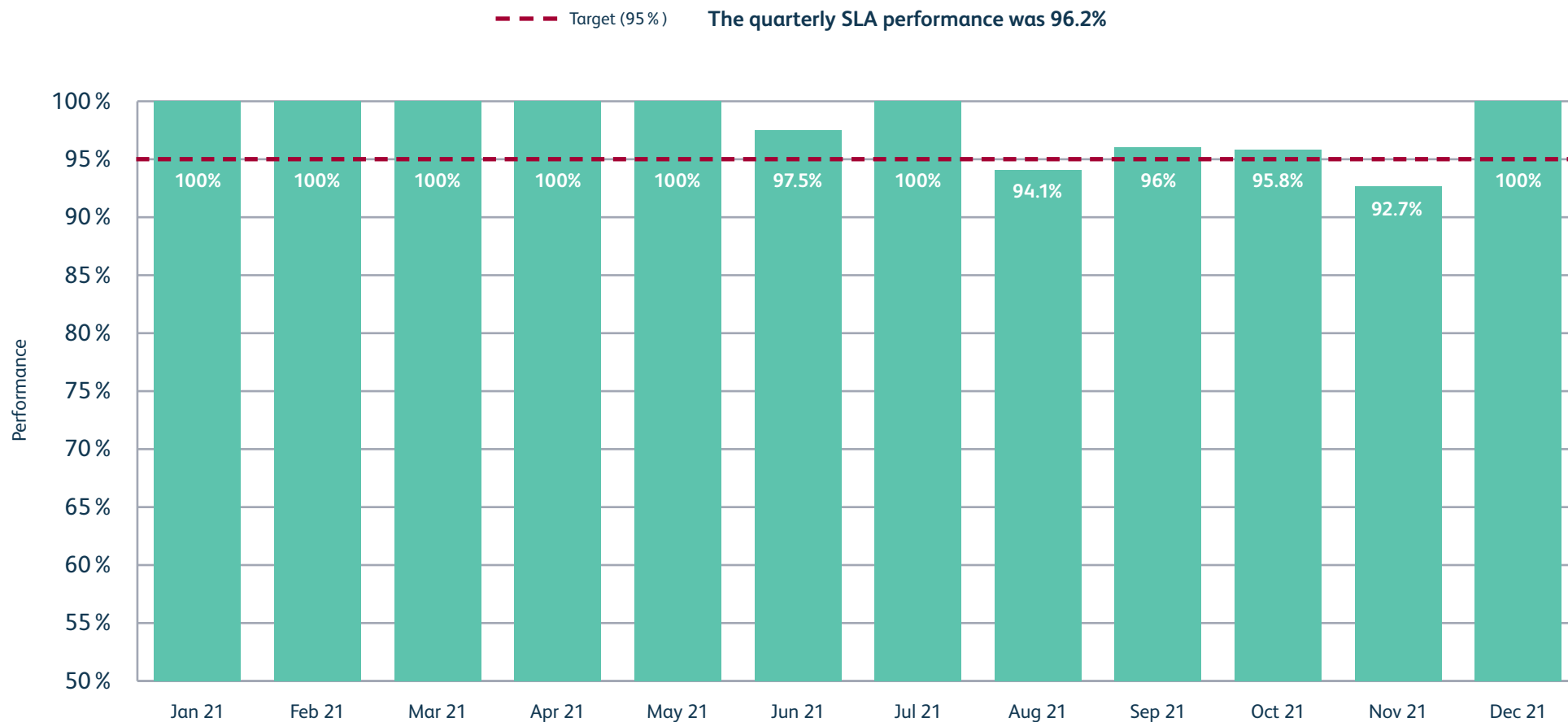
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# Casework Performance Against SLA

# Casework Performance Against SLA

## PERFORMANCE – ALL CASES

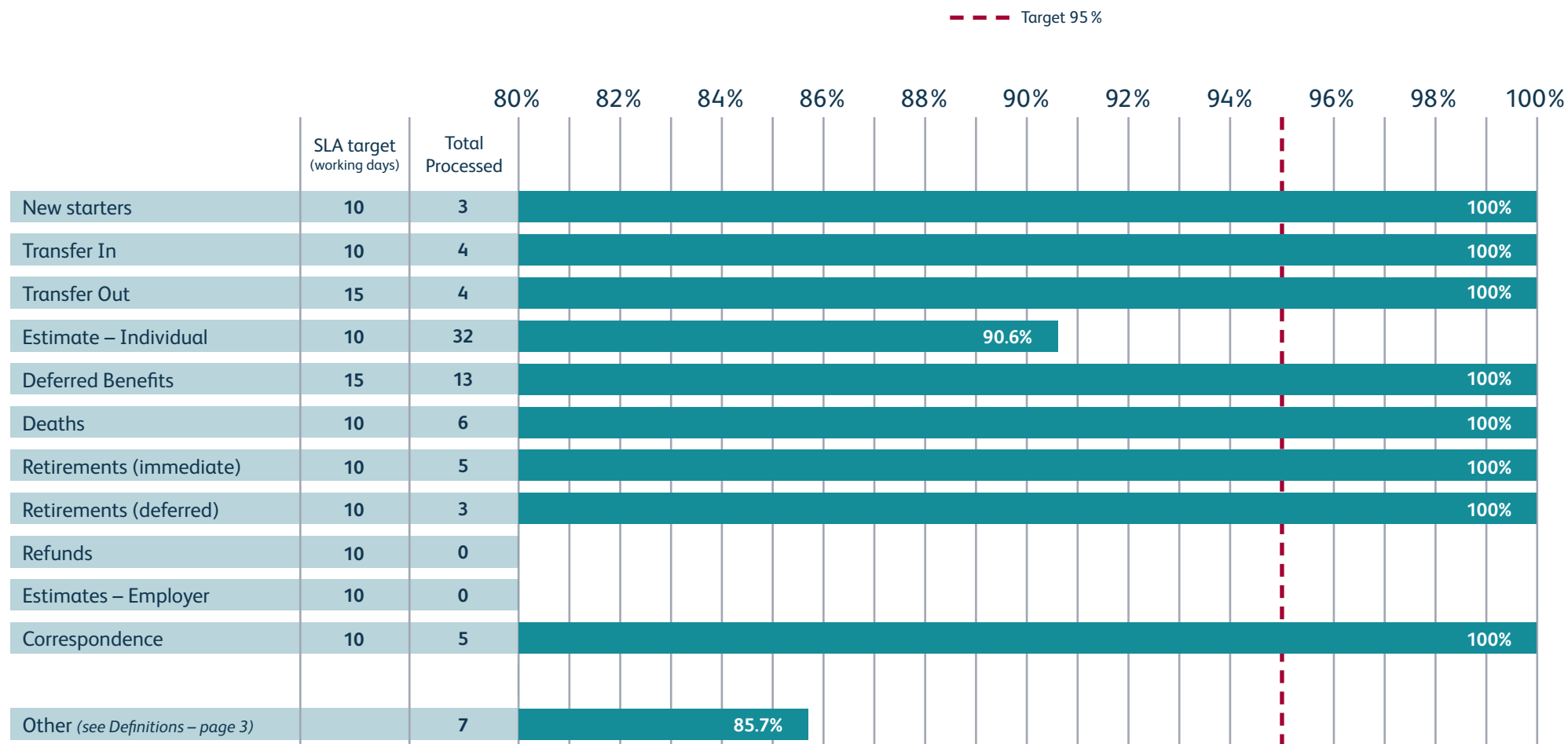
52



# Casework Performance Against SLA

## PERFORMANCE STANDARD

53



# Casework Performance Against SLA

## ONGOING CASEWORK AT THE END OF THE REPORTING QUARTER

	Brought Forward at 01/10/21	Completed	Received	Outstanding as of 31/12/21
New Starters	3	3	0	0
Transfer In	13	4	2	11
Transfer Out	3	4	5	4
Estimate - Individual	15	32	20	3
Deferred Benefits	11	13	6	4
Deaths	2	6	5	1
Retirements (Immediate)*	3	5	8	6
Retirements (Deferred)*	3	3	3	3
Refunds	0	0	0	0
Estimates - Employer	0	0	0	0
Correspondence	-1	5	6	0
Other (see Definitions – page 3)	14	7	5	12
<b>TOTALS</b>	<b>66</b>	<b>82</b>	<b>60</b>	<b>44</b>

\* In Q4 20/21, we trialed a new way of prioritising retirement cases. This resulted in the retirement process being split out into its two component parts 1) the options stage 2) the payment stage. The number of completed cases reported in this table may therefore vary to the number of retirements processed on page 11, which are reported against the SLA. We have since re-designed the workflow so that the two component parts of the process can be handled under the one case type.



Doing The Right Thing

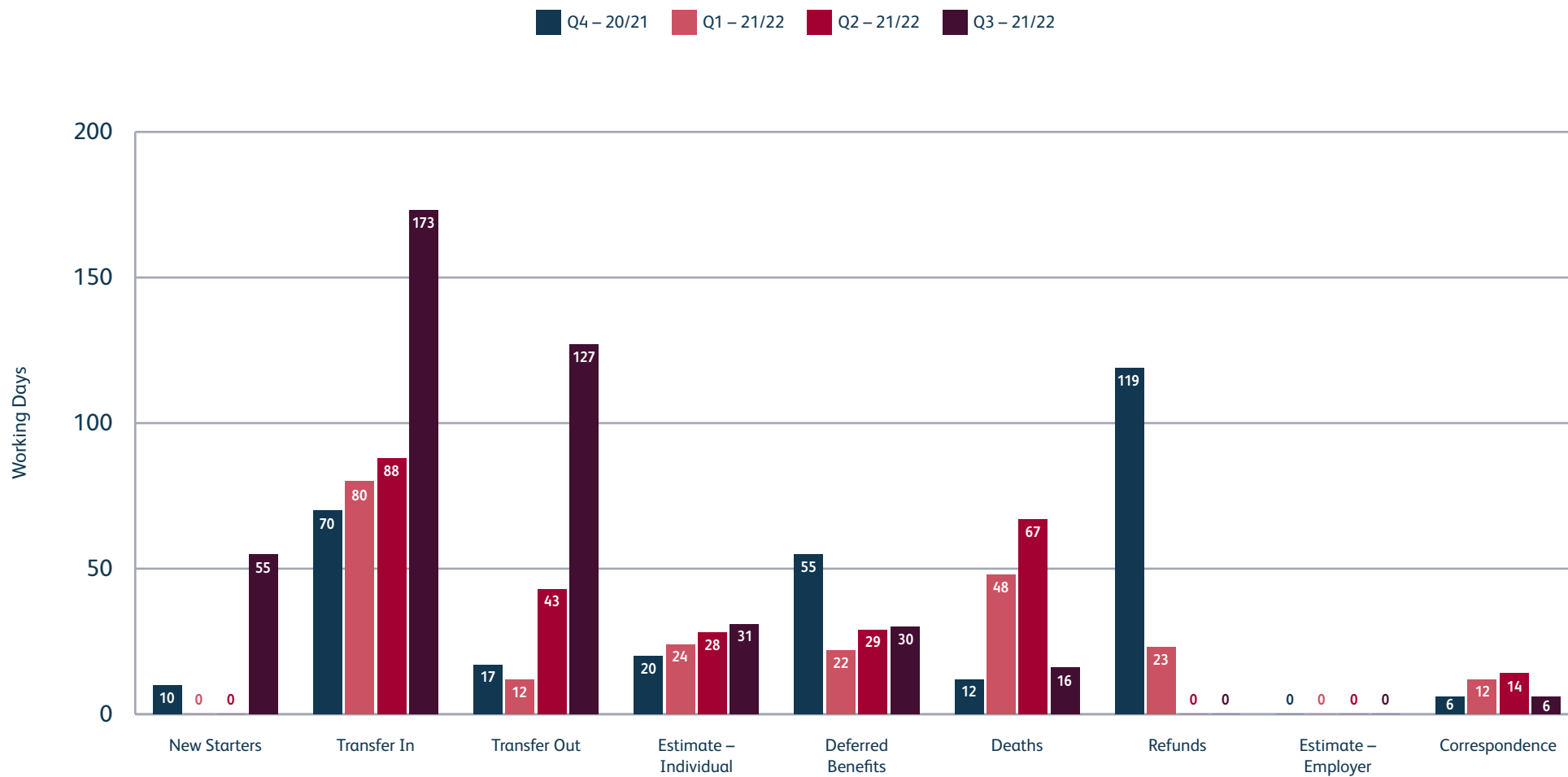
59

# Elapsed Times

# Elapsed Times

## ELAPSED DAYS BY QUARTER

56







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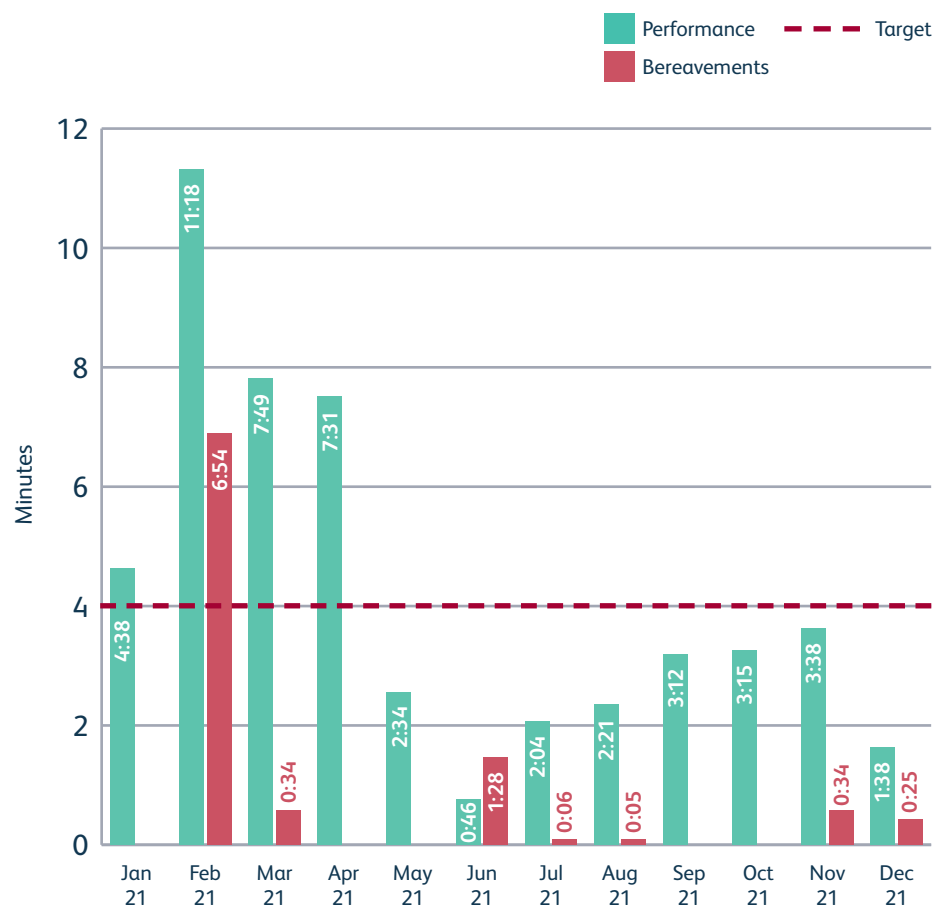
# Helpdesk Performance

The Helpdesk deals with all online enquiries and calls from Members for all funds that LPPA provide administration services for.

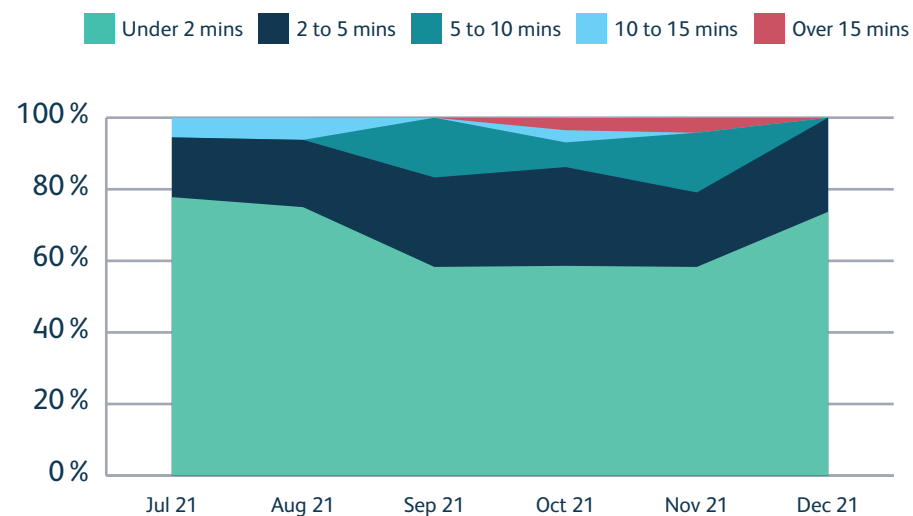
# Helpdesk Performance - Calls

## AVERAGE WAIT TIME

59



## WAIT TIME RANGE



	Under 2 Mins	2 to 5 Mins	5 to 10 Mins	10 to 15 Mins	Over 15 Mins
Jul 21	77.8%	16.7%	0%	5.6%	0%
Aug 21	75.0%	18.8%	0%	6.3%	0%
Sep 21	58.3%	25.0%	16.7%	0%	0%
Oct 21	58.6%	27.6%	6.9%	3.4%	3.4%
Nov 21	58.3%	20.8%	16.7%	0%	4.2%
Dec 21	73.7%	26.3%	0%	0%	0%

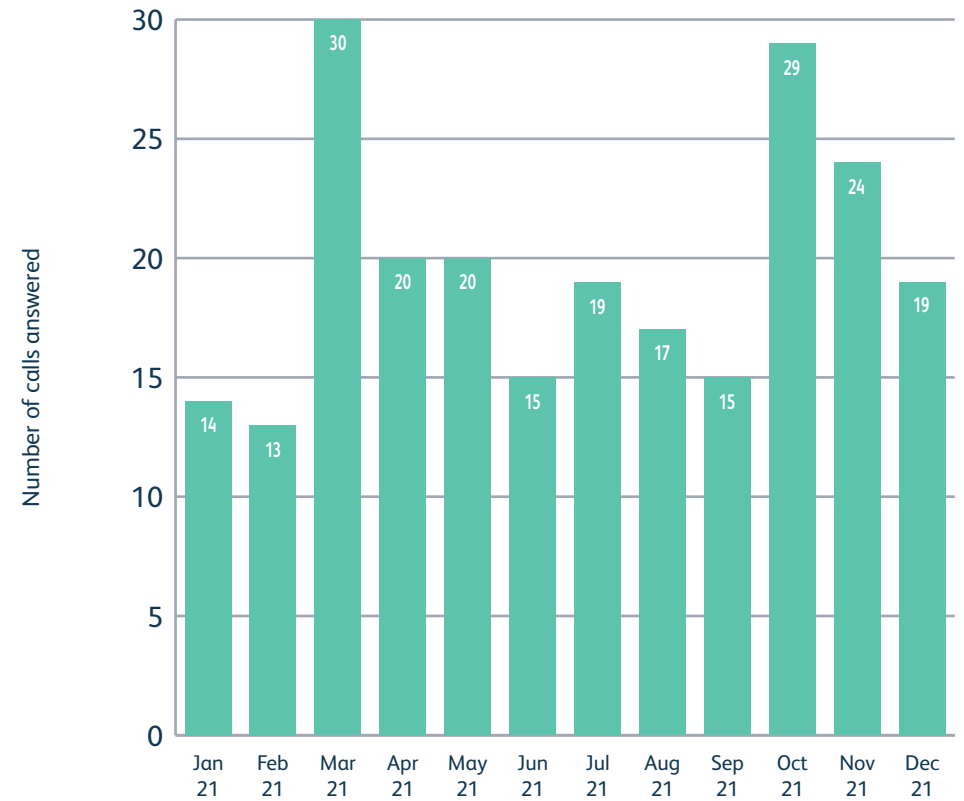
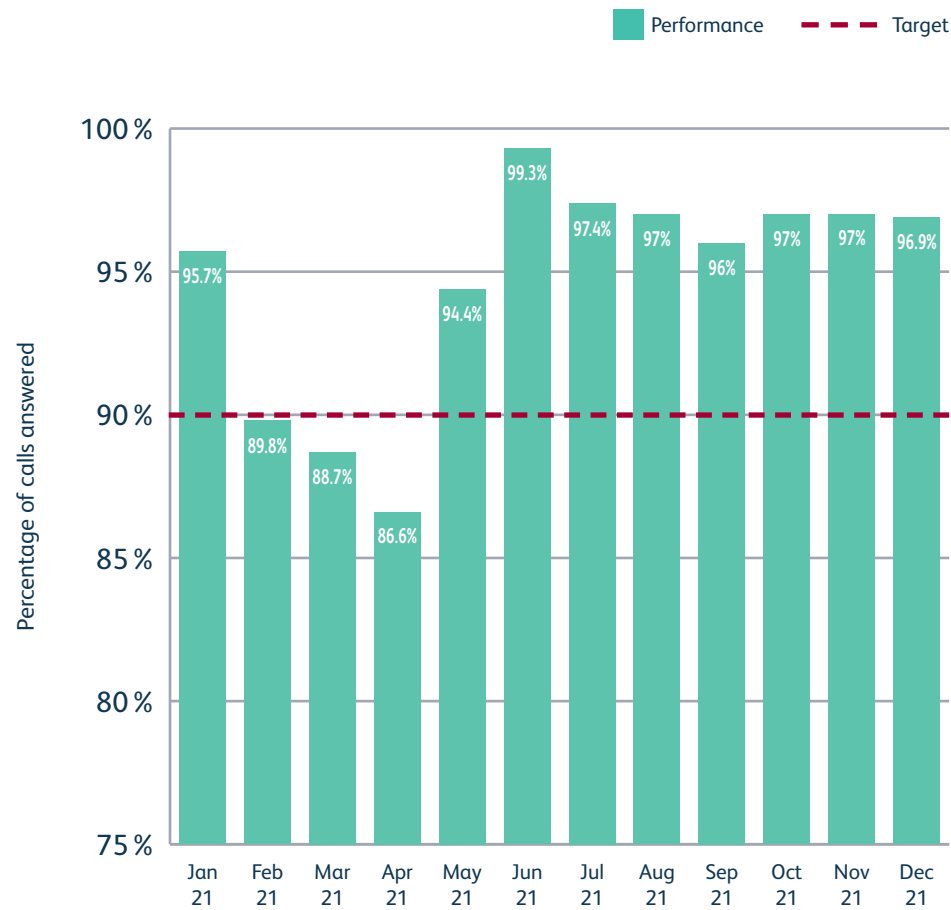
# Helpdesk Performance - Calls

## CALLS ANSWERED

(ALL LPPA)

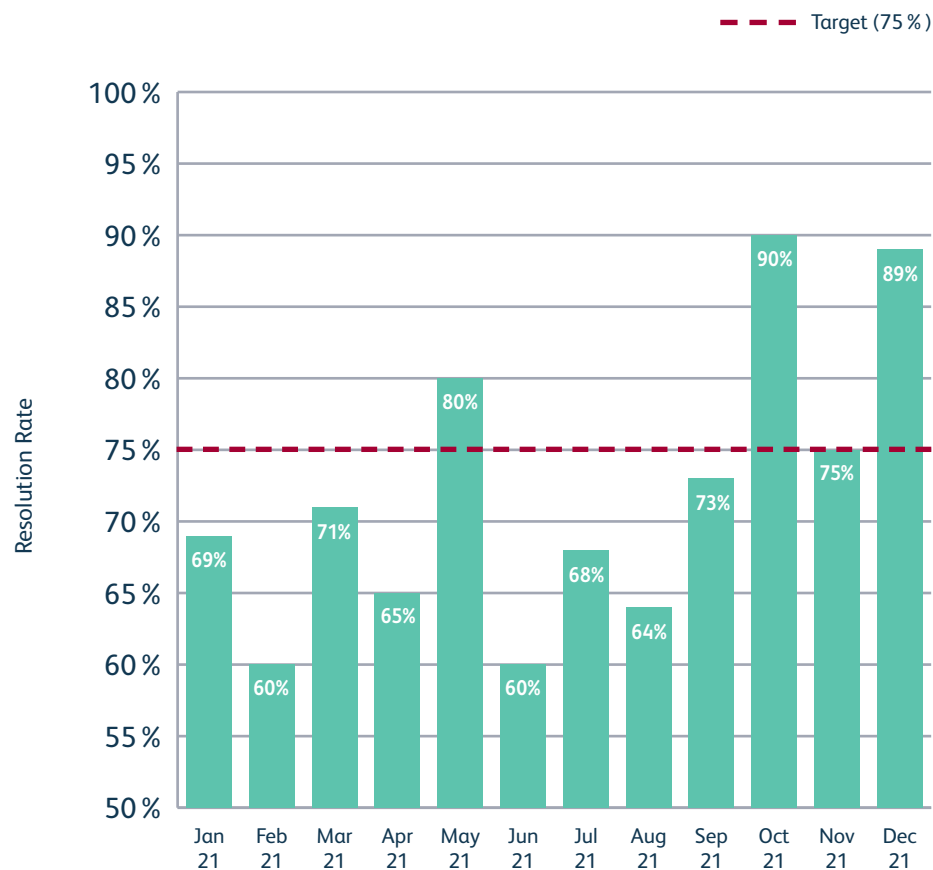
## CALL VOLUMES

69



# Helpdesk Performance - Calls

## RESOLUTION RATE\*



\*Queries not resolved at first point of contact had a subsequent case setup. Our operations team then respond within agreed contractual timescales.

## WHAT DO MEMBERS CALL ABOUT?

	OCT 21	NOV 21	DEC 21
Annual Benefit Statement	0	0	0
Annual Allowance	1	0	1
Additional Voluntary Contributions / Additional Pension Contributions	0	1	0
Bereavement	0	1	0
Deferred	0	0	0
Divorce	0	0	0
Estimate	7	6	4
Life Certificates	0	0	0
McCloud	0	0	0
My Pension Online	5	1	2
P60	2	0	0
Payslip	4	4	2
Pension Increase	0	0	0
Refund	0	0	0
Retirement	7	6	6
Transfer	1	3	1
Update Details	2	1	1
Other	0	1	2
<b>TOTALS</b>	<b>29</b>	<b>24</b>	<b>19</b>

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# Helpdesk Performance - Web Enquiries

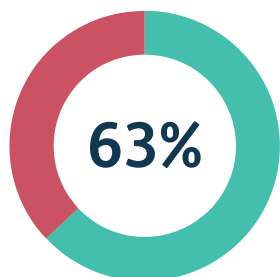
## RESOLUTION RATE\* (TARGET 75%)

## ENQUIRY HANDLING RATE

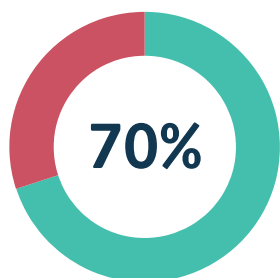
## WHAT DO MEMBERS ENQUIRE ABOUT?

61

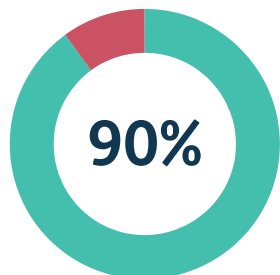
OCTOBER



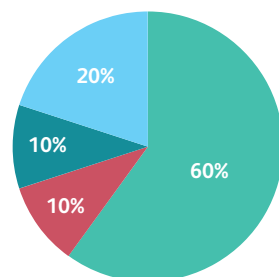
NOVEMBER



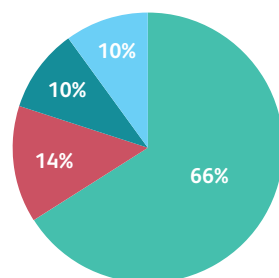
DECEMBER



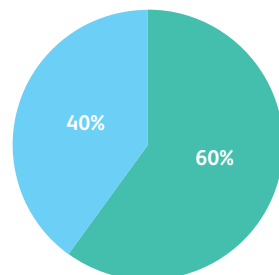
OCTOBER



NOVEMBER



DECEMBER



Under 1 Day  
1 to 2 Days  
2 to 3 Days  
3 to 5 Days  
Over 5 Days

	OCT 21	NOV 21	DEC 21
Annual Benefit Statement	0	0	0
Annual Allowance	0	0	0
Additional Voluntary Contributions / Additional Pension Contributions	0	0	0
Bereavement	1	0	0
Deferred	2	0	0
Divorce	0	0	0
Estimate	6	4	0
Life Certificates	0	0	0
McCloud	0	0	0
My Pension Online	1	7	0
P60	0	0	1
Payslip	0	1	1
Pension Increase	0	0	0
Refund	0	0	0
Retirement	0	4	2
Transfer	0	3	1
Update Details	0	1	0
<b>TOTALS</b>	<b>10</b>	<b>20</b>	<b>5</b>

\*Queries not resolved at first point of contact had a subsequent case setup. Our operations team then respond within agreed contractual timescales.



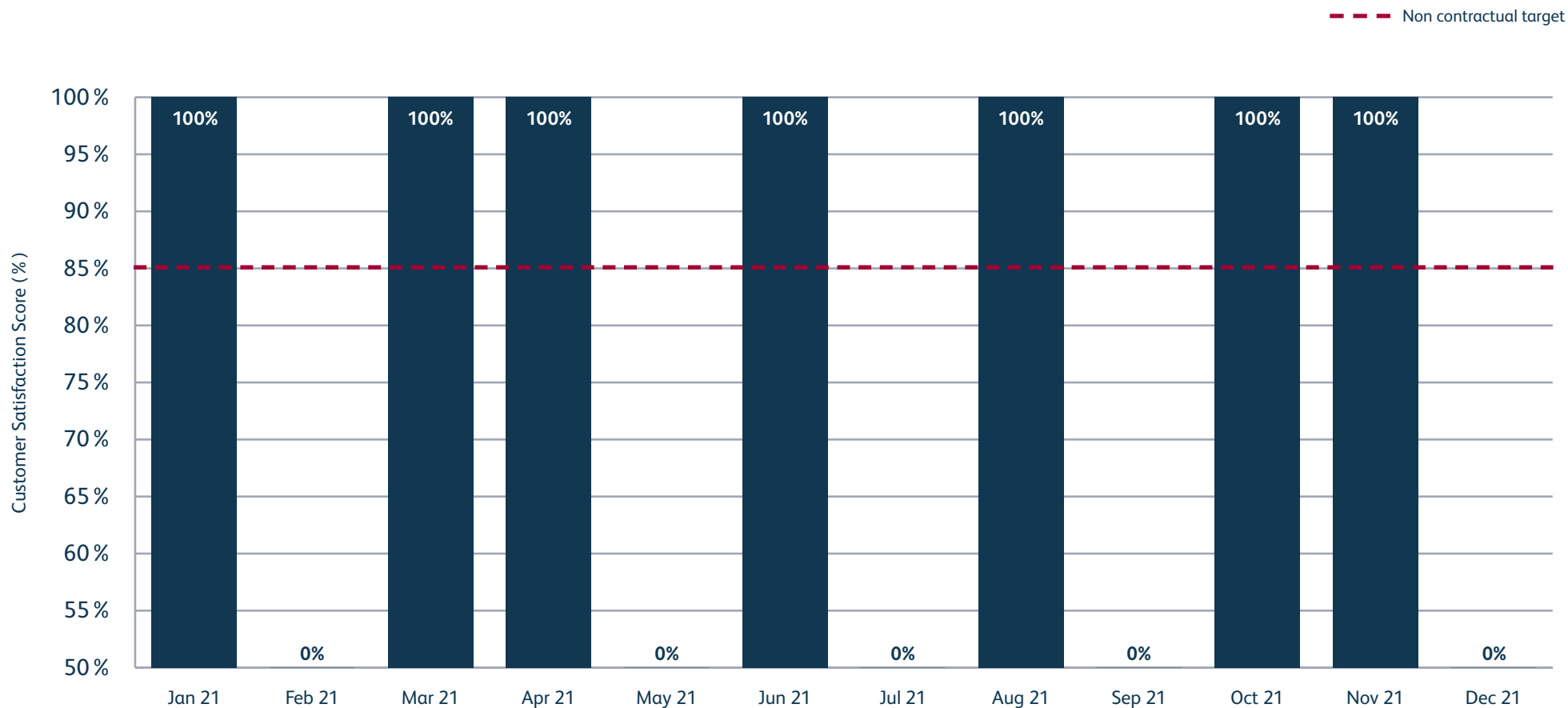
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# Customer Satisfaction Scores

# Customer Satisfaction Scores

## HELPDESK SATISFACTION (CALLS)

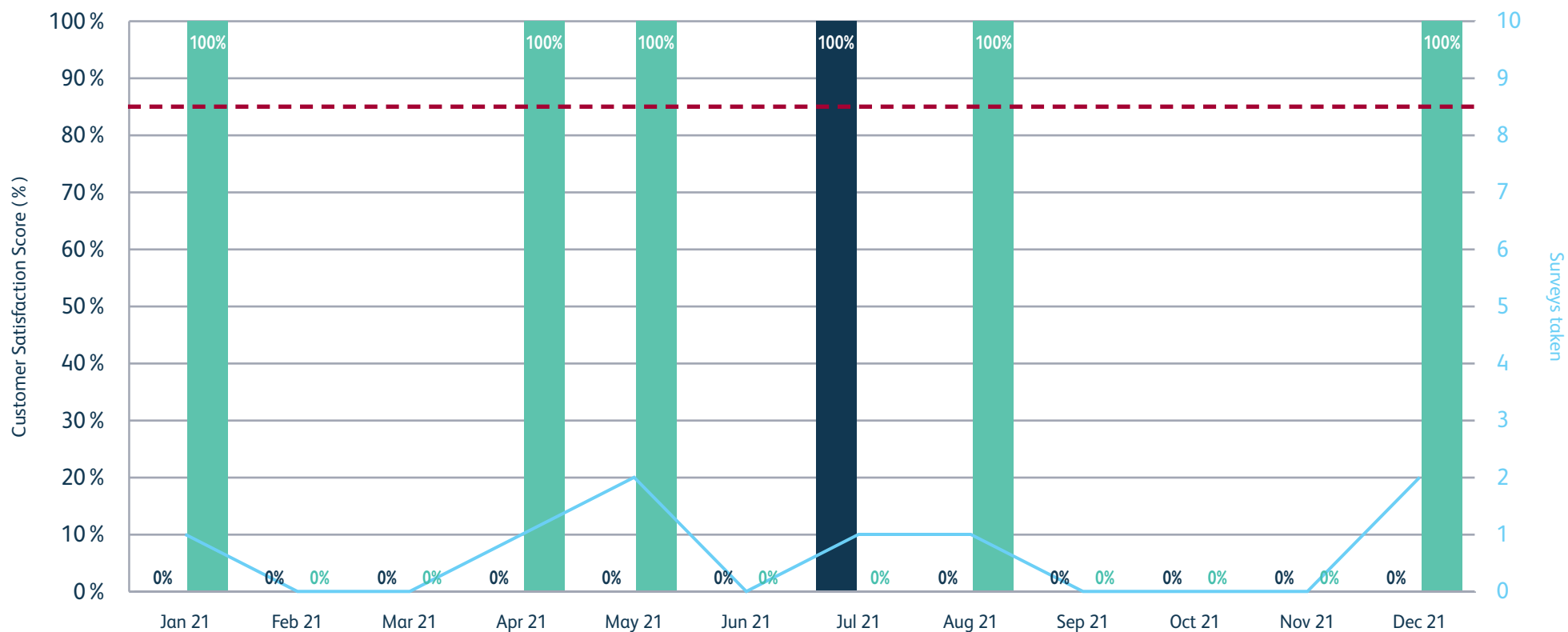
69



# Customer Satisfaction Scores

## RETIREMENTS

■ Dissatisfied   
 ■ Satisfied   
 - - - Non contractual target   
 — Surveys taken



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Forward Thinking

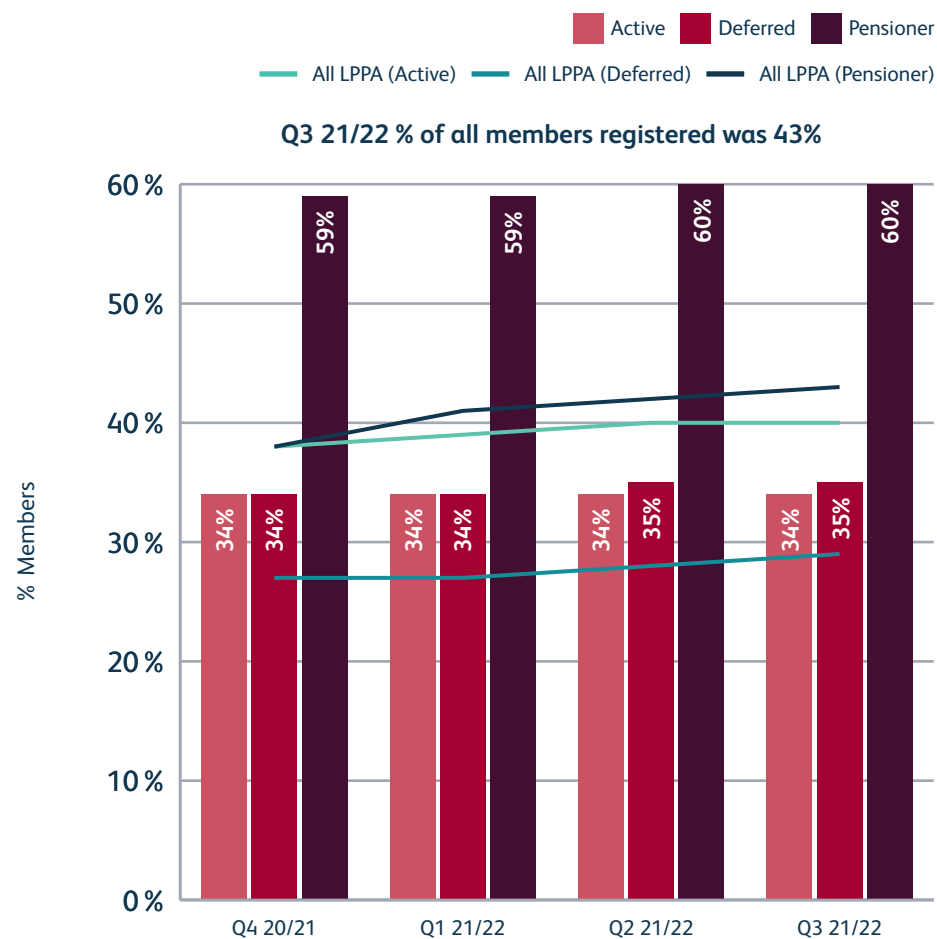
65

# My Pension Online (MPO)

# My Pension Online

## MEMBERS REGISTERED

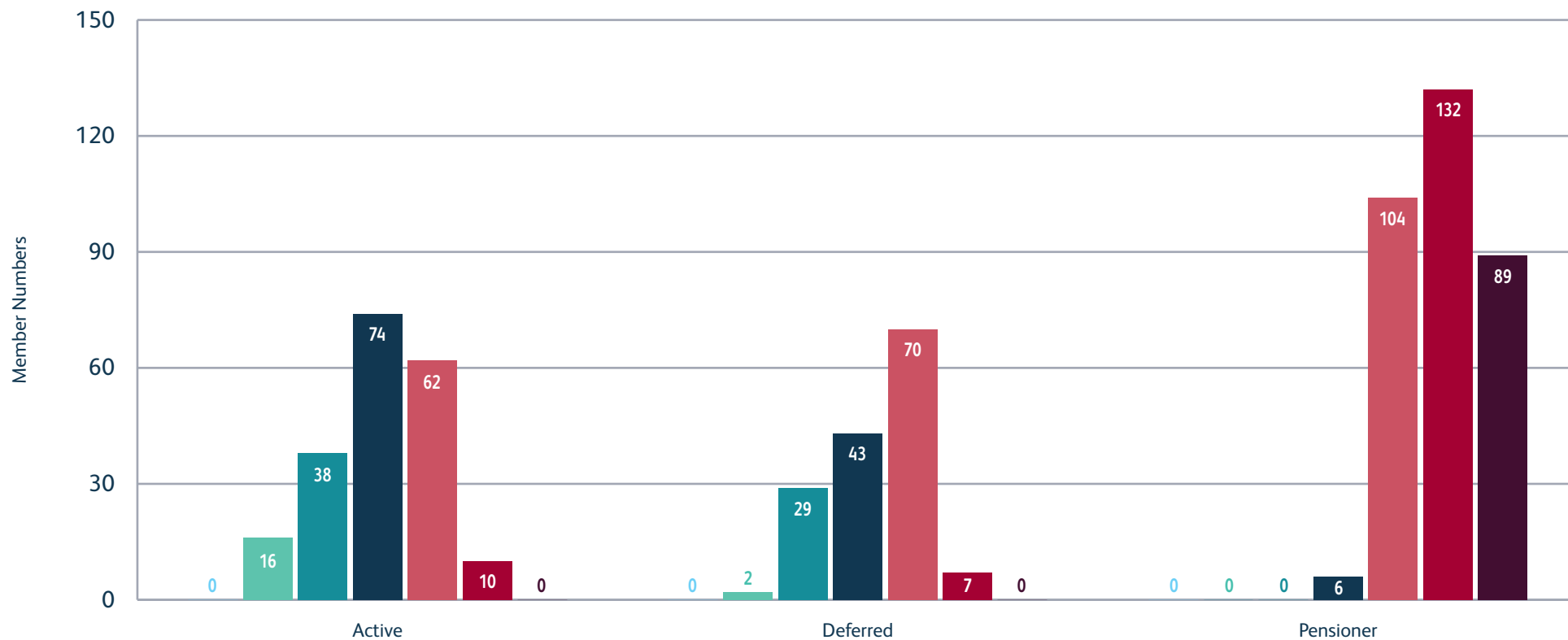
99



# My Pension Online

## AGE DEMOGRAPHIC

■ Under 21  
 ■ 21 to 30  
 ■ 31 to 40  
 ■ 41 to 50  
 ■ 51 to 60  
 ■ 61 to 70  
 ■ Over 70



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Forward Thinking

# Member Contact Data

# Member Contact Data

## EMAIL ADDRESSES

	Q4 - 20/21	Q1 - 21/22	Q2 - 21/22	Q3 - 21/22
Active Contributors	215 (36.56%)	215 (37.07%)	215 (36.94%)	221 (37.52%)
Deferred Beneficiaries	154 (37.20%)	153 (37.14%)	160 (37.83%)	169 (38.85%)
Pensioner and Dependents	332 (62.06%)	339 (62.43%)	345 (63.19%)	352 (64.00%)

## TELEPHONE NUMBERS

	Q4 - 20/21	Q1 - 21/22	Q2 - 21/22	Q3 - 21/22
Active Contributors	100 (17.01%)	103 (17.76%)	103 (17.70%)	108 (18.34%)
Deferred Beneficiaries	92 (22.22%)	91 (22.09%)	98 (23.17%)	98 (22.53%)
Pensioner and Dependents	173 (32.34%)	185 (34.07%)	191 (34.98%)	202 (36.73%)

# Member Contact Data

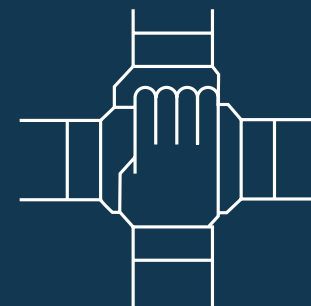
## DEATH NOMINATION

	Q4 - 20/21	Q1 - 21/22	Q2 - 21/22	Q3 - 21/22
Active Contributors	44 (7.48%)	44 (7.59%)	46 (7.90%)	46 (7.81%)

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## E-COMMUNICATIONS OPT-OUT

	Q4 - 20/21	Q1 - 21/22	Q2 - 21/22	Q3 - 21/22
Active Contributors	190 (32.31%)	221 (38.10%)	218 (37.46%)	213 (36.16%)
Deferred Beneficiaries	143 (34.54%)	148 (35.92%)	151 (35.70%)	159 (36.55%)
Pensioner and Dependents	40 (7.48%)	40 (7.37%)	40 (7.33%)	41 (7.45%)



Working Together

# Employer Engagement & Communication Activity

71

# Employer Engagement & Communication Activity

## DELIVERED – ALL CLIENTS

1. Our 'Life is for Living' retirement campaign was communicated to all client members. This included a survey asking members for their views on retirement in a single word, sentence, or image. There were over **12,000 responses** (across all clients) and the LPPA Communications Team have [created an online video & report](#) detailing the findings.
2. In addition to our existing Blue Light member panel, **our first LGPS member panel** took place. Both panels will meet quarterly and will continue to grow through ongoing recruitment of members ... they will offer an opportunity to ensure LPPA communications continue to be useful and relevant to members.
3. A news story was published on the LPPA website to coincide with [Get Online Week \(18 Oct 21\)](#). The aim was to provide online tools and resources, to encourage members to visit and make more frequent use of the LPPA website.
4. A new survey was be launched to measure member satisfaction for **New Joiners** (those who have recently joined the pension scheme)
5. A new **monthly Employer bulletin (PensionPulse)** was launched with the aim of providing more frequent updates on training, LGA regulatory information and LPPA projects
6. A new animated video was made launched on the website for members. '[More than just a great pension](#)' was developed to explain defined benefit pension schemes to members, and the benefits that these schemes offer to Local Government, Police and Fire pension members
7. LPPA launched a [LinkedIn page](#), providing another useful employer engagement channel, in addition to our existing email, website and YouTube digital communications channels

Life is  
for Living!





# Employer Engagement & Communication Activity

## SCHEDULED – ALL CLIENTS

1. The focus for the Engagement and Communications team in Q4 will be **Project PACE**, and delivering training sessions to Phase 1 employers on the new employer portal, as well as providing support for employer enquiries relating to the launch of our new administration system.
2. The launch of **PensionPoint**, the new member online portal which is replacing My Pension Online, will be a focus for our member communications activity in Q4. User guides and videos will be launched on the LPPA website and made available to members who want an overview of the new portal, or would like to understand how to register / gain access to PensionPoint
3. Q4 activity will also include sessions covering pension scheme and retirement essentials (member focused), as well as Year End training for employers.
4. Feedback from the new joiner process will be used to update and improve the new joiner pages on our website.



# Employer Engagement & Communication Activity

## EMAILS – EMPLOYERS

Date	Message / Campaign	Call to Action
OCTOBER	PACE: Phase 1	Information
NOVEMBER	PensionPulse	Information
DECEMBER	PensionPulse	Information
	LPPA Christmas card	Notification



Doing The Right Thing

# 75 Data Quality

# Data Quality (TPR scores)

## QUARTERLY COMMON DATA

Data Item	Active	Deferred	Pensioner / Dependant
NI Number	0	0	1
Surname	0	0	0
Forename / Initials	0	0	0
Sex	0	0	0
Date of Birth	0	0	0
Date started pensionable service / Policy / Contributions	0	0	0
Expected retirement / maturity / target retirement date	0	0	0
Membership status	0	0	0
Last event status	0	0	0
Address	2	20	1
Postcode	2	19	1
<b>Total fails</b>	<b>4</b>	<b>39</b>	<b>3</b>
<b>Individual fails</b>	<b>2</b>	<b>20</b>	<b>2</b>
<b>Total members</b>	<b>589</b>	<b>435</b>	<b>550</b>
<b>Accuracy rate</b>	<b>99.7%</b>	<b>95.4%</b>	<b>99.6%</b>

**Total accuracy rate**

**98.5%**

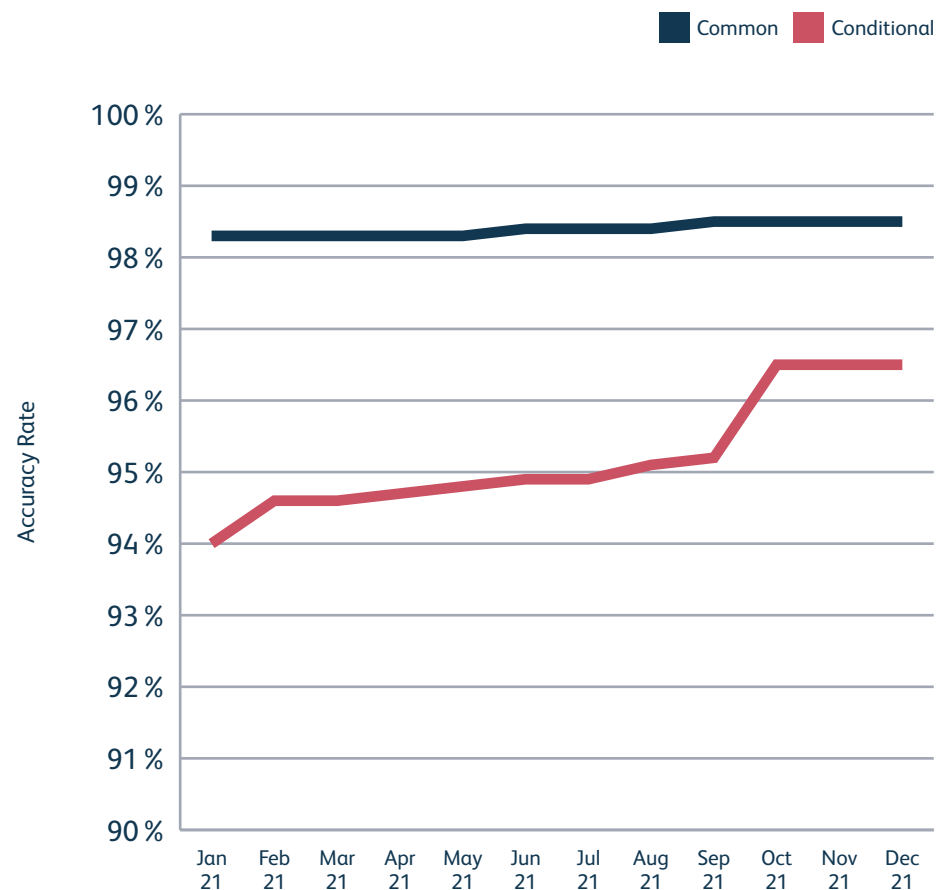
# Data Quality (TPR scores)

## QUARTERLY CONDITIONAL DATA

Data Item	Fails
Divorce records	0
Transfer In	0
AVC's / Additional Contributions	2
Deferred Benefits	0
Tranches (DB)	1
Gross Pension (Pensioners)	1
Tranches (Pensioners)	8
Gross Pension (Dependants)	0
Tranches (Dependants)	0
Date of leaving	0
Date Joined Scheme	0
Employer Details	0
Salary	1
Crystallisation	7
Annual Allowance	2
LTA Factors	0
Date Contracted Out	0
Pre-88 GMP	18
Post-88 GMP	40
<b>Total fails</b>	<b>80</b>
<b>Individual fails</b>	<b>55</b>
<b>Total members</b>	<b>1,574</b>

**Total accuracy rate 96.5%**

## ANNUAL COMMON & CONDITIONAL ACCURACY RATE



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# LPP

Local Pensions Partnership  
Administration

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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