

Fire Local Pension Board

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

Agenda

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

Date: Thursday 20 July 2023

Time: 10 am

Place: Community Room, Cumbria Fire and Rescue Service Headquarters, Kemplay Bank, Penrith, CA10 2FA

Kristine Ward
Head of People and Talent

Enquiries and requests for supporting papers to:

Sandra Sedgwick

Direct Line: 07833400563

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This agenda is available on request in alternative formats

MEMBERSHIP

Employer Representatives:

Mike Johnston, Deputy Cumbria Commissioner Fire and Rescue Authority

Steven Tickner, CCFRA Chief Finance Officer (s.151 Officer)

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. DISCLOSURE 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 Board Member 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 meetings held on 9 March 2023 (copy enclosed).

6. SCHEDULE OF FUTURE MEETINGS

Future meetings of the Fire Local Pension Board will be arranged on a quarterly basis.

7. CHANGE OF FIRE PENSION SCHEMES GOVERNANCE

To note the change of Governance for the Cumbria Fire Pension scheme(s) detailed in a report from the Chief Fire Officer (copy enclosed).

8. MONITORING REPORT FOR THE PERIOD ENDING 31 May 2023 (including Risk Register)

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

9. CUMBRIA FIRE PENSION SCHEME(S) ADMINISTRATION, MANAGEMENT AND GOVERNANCE STRATEGY

To consider the Administration, Management and Governance Strategy (copy enclosed).

10. LPPA UPDATE

To receive a verbal update from Local Pensions Partnership Administration.

11. DATE AND TIME OF NEXT MEETING

The next meeting date of the Cumbria Fire Local Pension Board is to be confirmed.

PART 2 – ITEMS CONSIDERED IN THE ABSENCE OF THE PRESS AND PUBLIC

12. MONITORING REPORT FOR THE PERIOD ENDING 31 May 2023 IDRP (PART 2)

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

13. VERBAL UPDATE ON EMERGING ISSUES

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

Fire Local Pension Board Terms of Reference

Version Control	Changes Made	Author
Version 1 July 2023	Terms of Reference	Head of People and Talent

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 fighters' 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 CFRS Strategic Governance Board 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 Joint Audit Committee (JAC) 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.
 - 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 Cumbria Fire and Rescue Services 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 Cumbria Fire and Rescue Service's website. On request alternative media versions are available.
- 6.4 The Cumbria Commissioner Fire and Rescue Authority, as the Scheme Manager (delegated to the Chief Fire Officer), is the registered data controller of the Cumbria FPS, and as such all policies and practices in this regard applicable within the Cumbria Fire and Rescue Service 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, Cumbria Commissioner Fire and Rescue Authority and Head of People and Talent or nominated deputies.
- 7.3 Appointments will be for four years (or, in the case of a publicly elected role, 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 Cumbria Fire and Rescue Service's agreed policies and rates. 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 3.1 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 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 Cumbria Fire and Rescue Service's agreed policies and rates. All such costs will be met directly by the Cumbria Fire and Rescue Service.

Fire Local Pension Board

Minutes of meeting 9 March 2023

Minutes of a Meeting of the Cumbria Fire Local Pension Board held on Thursday, 9 March 2023 at 2.00 pm at Cumbria Fire and Rescue Service HQ, Carleton Avenue, Penrith, CA10 2FA

PRESENT:

Mr D Harrison (Chair)
Mrs J Willis (Vice-Chair)
Mr M Nicholson

Also in Attendance: -

Mr C Dawson	-	Head of Engagement, Marketing & Communication (LPPA)
Mr J Beard	-	Chief Fire Officer
Mr A Farrar	-	Democratic Services Officer
Ms L Taylor	-	Finance Manager - Pensions Investments and Governance
Ms S Sedgwick	-	Senior Advisor Pensions
Ms K Ward	-	Business Partner
Ms E Hebblethwaite	-	Client Relationship Manager (LPPA)
Ms S Benson	-	Senior Advisor
Ms C Hey	-	Local Government Association

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

1. APOLOGIES FOR ABSENCE

No apologies were received. The Chair welcomed Mr McCall to the meeting.



2. MEMBERSHIP AND TERMS OF REFERENCE

The Terms of Reference were noted.

3. DISCLOSURES OF INTEREST

There were no disclosures of interest made at this meeting.

4. EXCLUSION OF PRESS AND PUBLIC

RESOLVED, that the press and public be excluded from the meeting during consideration of Agenda Items No 10 – Monitoring Report for the Period Ending 30 September 2022 IDRPs (Part 2) and No 11 – Verbal Update on McCloud and Matthews and No 12 – 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).

A minute's silence was observed upon the death of Councillor Lamb.

The Chair gave a brief tribute to Councillor Lamb and recalled his first meeting with him when Councillor Lamb attended a Cumbria Fire Pension Board meeting as part of work experience shadowing a Cumbria County Councillor at the age of 16.

5. MINUTES

RESOLVED, that the minutes of the previous meetings held on 20 October 2022 and 5 December be agreed as a true and accurate record.

6. SCHEDULE OF FUTURE MEETINGS

The future meeting dates of the Cumbria Fire Local Pension Board would be confirmed as Local Government Reorganisation in Cumbria progresses.

7. MONITORING REPORT FOR THE PERIOD ENDING 30 SEPTEMBER 2022

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 31 December 2022 and any performance monitoring issues of the Scheme to 30 September 2022.

The Chief Fire Officer brought to the Board's attention a breach and updated the Board that it was not reportable and highlighted the risk register.

The Chair noted the key personnel risk and queried if the Chief Fire Officer was comfortable with the position and would there be further links with Cumbria Constabulary.

The Chief Fire Officer noted that he was aware that there were gaps regarding personnel but commented that it would be a 2-year programme for disaggregation. It was important that

Cumbria Fire and Rescue Services stood alone and then it would be clear where collaborations would be required.

The Police & Crime Commissioner commented that until it was clear what the pure costs would be to run Cumbria Fire & Rescue Service it would be a challenge. All options were open and blue light collaboration was possible.

The Business Partner commented that work had been undertaken and an agreement would be in place with LPPA for 1 April.

The Senior Advisor – Pensions highlighted the following:

- **Remedy to Sargeant Age Discrimination Case** –A copy of the draft regulations had been received in the previous week.
- **Matthews Second Options exercise** – Received guidance document and was gathering background information.

The Chair noted that the Pensions Dashboard had been deferred.

The Senior Advisor Pensions commented that it was better to ensure that everything was correct.

RESOLVED, That the Cumbria Fire Local Pension Board received and noted the performance of the Cumbria Firefighters' Pension Scheme (FPS) to 30 September 2022 and any material policy or governance issues and national regulatory changes to 31 December 2022.

8. LPPA UPDATE

The Head of Engagement, Marketing & Communication- Local Pension Partnership Administration gave an update. The following areas were covered including: -

- Pensions Dashboard
- Project PACE
- Quarter 3 Performance
- Helpdesk

The Chair commented on dissatisfaction levels and if any reasons had been communicated.

The Head of Marketing, LPPA noted that the following reasons were given wait time, delays in paperwork and query of information in the packs.

A round table discussion took place about the decline in the number of members who had registered with the new portal. The Senior Advisor – Pensions agreed that it would be promoted internally.

The Chair congratulated LPPA on their performance and thanked the Head of Engagement, Marketing & Communication at LPPA for their update.

9. DATE AND TIME OF NEXT MEETING

The next meeting date of the Cumbria Fire Pension Board will be confirmed as Local Government Reorganisation in Cumbria progresses.

10. MONITORING REPORT FOR THE PERIOD ENDING 30 SEPTEMBER 2022 IDRPs (PART2)

The Senior Advisor Pensions gave an update on IDRPs Stage 2 appeal and an IDRPs Stage 1 appeal.

11. VERBAL UPDATE ON MCCLOUD AND MATHEWS

The Local Government Association gave an update. The following areas were covered including: -

- Sargeant timeline
- Key provisions
- Legislative timeline
- Matthews
- 2023 options exercise
- 2023 options exercise in scope
- 2023 options exercise entitlement
- Challenges
- Mitigations
- Pensions dashboard
- Staging
- Actions for schemes

12. VERBAL UPDATE ON EMERGING ISSUES

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

- Pay Award Agreement
- Change in Governance

The Chair thanked Councillor Willis as this would be her last meeting. The Police and Crime Commissioner thanked Councillor Willis for her energy, enthusiasm and commitment to Cumbria Fire & Rescue Service.

The Chair and Vice Chair thanked the Chief Fire Officer for his work and wished him well in his retirement and then continued to thank the wider team for their hard work.

The meeting ended at 4.10 pm

Fire Local Pension Board

CUMBRIA FIRE PENSION SCHEME – CHANGE OF GOVERNANCE from 1 April 2023

EXECUTIVE SUMMARY

This report advises Cumbria Fire Local Pension Board Members of the changes to the governance of the Cumbria Fire Pension Scheme, as a result of Local Government Reorganisation in Cumbria, from 1 April 2023.

1. Background

Prior to 1 April 2023, Cumbria Fire and Rescue Service was part of Cumbria County Council. The Council was the Fire Authority and was the Scheme Manager for the Fire Pension Scheme(s). The Council delegated this function to the Chief Fire Officer.

2. Local Government Reorganisation (LGR) in Cumbria

On 1 April 2023 Local Government in Cumbria was reorganised and Cumbria County Council and the 6 district councils ceased to exist. They were replaced by two Unitary Councils (Cumberland Council and Westmorland and Furness Council), and the Fire and Rescue Authority moved to the governance of the Cumbria Commissioner Fire and Rescue Authority (CCFRA).

3. New Governance Arrangements for the Fire Pension Scheme from 1 April 2023

As a result of the changes detailed above Fire Pension Scheme Manager responsibilities now comes under the Cumbria Commissioner Fire and Rescue Authority (CCFRA). The Commissioner has delegated these responsibilities to the Chief Fire Officer.

4. Role of Cumbria Fire Local Pension Board and Recommendation

Fire Local Pension Boards were established in accordance with Regulations 4A to 4D of the Firefighters' Pension Scheme (England) Regulations 2014.



The scheme manager must have regard to guidance issued by the Secretary of State in relation to Local Pension Boards but the Authority will select the members.

The Cumbria Fire Local Pension Board is responsible for assisting the Scheme Manager of the Cumbria Fire Pension Scheme(s) to comply with all relevant legislative requirements and to ensure the effective governance of the schemes for Cumbria Fire Pensions, and this is set out in more detail in the Fire Local Pension Board's Terms of reference.

Cumbria Fire Local Pension Board Members are asked to note the changes to the governance of the Cumbria Fire Pension Schemes.

**Rick Ogden
Chief Fire Officer**

Fire Local Pension Board

Monitoring Report for the Period to 31 May 2023

1. EXECUTIVE SUMMARY

This report advises Cumbria Fire Local Pension Board Members of any material risk management, policy or governance issues and national regulatory changes and any performance monitoring issues of the Scheme to 31 May 2023.

Cumbria Fire and Rescue Service's vision is to be "A community focused, professional and trusted Fire and Rescues Service that makes Cumbria a safer place for all".

This report is the first under the new Governance arrangements for Cumbria Fire and Rescue Service. Good governance and risk management will aid the Cumbria Commissioner Fire and Rescue Authority (CCFRA) in their 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.

A Delegation Agreement for Scheme administration functions to Lancashire County Council has been signed and a new Administration, Management and Governance Strategy has been developed for the Cumbria Fire Pension Schemes to assist the Scheme Manager in the exercise of their responsibilities. These documents, formalise standards and expectations of CCFRA and the Pension Administrator, LPPA.

KEY POINTS TO NOTE

1.1. Risk Management:

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.

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

1.2. Pensions Administration:

For the quarter to March 2023, performance against the KPIs was 90% and for the months of April to May 78%, against the SLA target of 95%. This variation was mainly attributable to LPPA move to a new pension system, creating operational pressures.



1.3. Governance:

As outlined in an earlier report, the reorganisation of local authorities in Cumbria with effect from 1 April 2023, has resulted in the Governance and Pension Scheme Manager responsibilities transferring to the Cumbria Commissioner Fire and Rescue Authority. Scheme manager responsibilities have subsequently been delegated to the Chief Fire Officer.

There have been no breaches during this quarter and there were no discretions exercised.

1.4. Other

The regulations for both the Sergeant / McCloud and Matthews remedies have not yet been published. However, this report includes the progress on the preparations for the implementation of these remedies.

2. STRATEGIC PLANNING AND EQUALITY IMPLICATIONS

There are no direct equality implications arising out of the recommendations in this report.

3. RECOMMENDATION

It is recommended that the Cumbria Fire Local Pension Board receive and note the performance of the Cumbria Firefighters' Pension Scheme (FPS) and any material policy or governance issues and national regulatory changes to 31 May 2023.

4. RISK

Cumbria Fire Local Pension Board (the Board) follows accepted best practice across Public Sector Pension Schemes in formally reviewing Scheme risks at every meeting and the current risk register as of July 2023 is attached at Appendix 1.

No new risks have been added however, one risk (Risk 2.7 Fire Governance Transition as previously reported) has been removed from the risk register since the last meeting. As of the 1 April 2023 the governance of CFRS transitioned over to the *Cumbria Commissioner Fire and Rescue Authority*. Throughout the transition process the focus was on ensuring high quality provision of services was maintained and to support this SLAs for ongoing services from the unitary councils put in place. The risk associated with these services are now reported under Risk 2.4 – Loss of key personnel.

Risk 2.4 Loss of key personnel - There are several individuals involved in work of Fire pensions (from People Management, Finance, Legal, Payroll and Systems teams who are responsible for delivering day to day work on both the two major projects: Sargeant and Matthews. On the 1 April, some of these services became hosted across Westmorland & Furness and Cumberland Council. Service Level Agreements are in place with all hosted services (still to be finalised) to ensure continuity of service. Plans will be developed for longer term disaggregation and more permanent, as each individual is a single point of expertise within that team and a loss of any of those skills and knowledge is likely to have a detrimental impact on delivery of pension responsibilities.

The comments associated with have all been reviewed and updated where necessary to reflect developments since the previous meeting.

The register currently has 13 risks, comprising 3 red risks (information security arrangements, the Sargeant Judgement, loss of key personnel); 2 amber risks (pension administration processes, the O'Brien/Matthews Judgement), and 8 green risks. One risk (Risk 2.7 Fire Governance Transition as previous reported) has been removed from the risk register since the last meeting.

5. SCHEME MONITORING

5.1. LPPA Performance

To allow members of the Board to perform effective governance and oversight of the Scheme Administration, the annual performance report 2022/23 and the quarterly performance report to 31 March 2023 are attached at Appendix 2.

The move to a new pension administration system (project PACE) has resulted in a year of challenges. Performance against SLAs was adversely impacted as the casework teams completed the backlog due to the impact of this project and the migration to the new system (UPM).

Overall performance improved in the quarter to March 2023 with a score of 91.2% compared to the previous quarter (85.2%) although remaining below the SLA target of 95%. LPPA have provided an interim report to May, which again shows variations across these months.

Overall operational casework performance for May was 93.8% against overall Service Level Agreements (SLAs) of 95%, an increase from the previous month's performance (April performance was 65.0%). Helpdesk performance average call wait time was 4 minutes 19 seconds, slightly above the targeted average wait time of 4 minutes (and up from 3 minutes 15 seconds the previous month). Activity levels are and are expected to remain high for the rest of this year.

Member retirement satisfaction scores remained the same in Q4 to Q3 at 64%. The Member Engagement Team are reviewing the satisfaction surveys to identify potential opportunities to improve the member experience.

There are several areas where performance is lower than what would be expected, however they are largely attributable to the implementation of the new system. CFRS will continue to monitor this and work alongside LPPA in order to find solutions.

A representative from LPPA attends the quarterly board meeting on a regular basis to provide the board with updates. Client Relationship Manager from LPPA will be joining us in person at this meeting to provide an update and reassurance on their progress to improve performance.

5.2. Data Quality

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. This notes that the Scheme reported 98.4% 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 94.6% present and accurate and reflect those of the previous quarter.

5.3. Legal breaches recorded / reported during the quarter

There have been no breaches reported to the Regulator in the quarter, and no potential breaches.

5.4. Scheme Discretions

There have been no scheme discretions exercised during the quarter.

5.5. Pensions Ombudsman

As reported in previous quarters, there has been one case which has been appealed to the Pensions Ombudsman.

The case relates to a former Retained Fire Fighter who, in the first options exercise elected to buy Modified Scheme Pension but then made a further election to convert this to the Standard 2006 Scheme (he ticked this box on the paperwork).

A response by CFRS was submitted to the Ombudsman and we are still waiting for either an update or the outcome.

5.6. IDRP

In the last quarter, one Stage 2 and one Stage 1 (review) appeals have been concluded through the IDRP process. Details are set out in Part 2 of this Monitoring Report.

IDRP Stage 2 Person A

A Stage 2 appeal was received in February 2023 and the board was provided with a verbal update at the meeting in March. The case was presented to a Stage 2 panel in March who, after receiving the evidence available, decided not to uphold the complainant's appeal. The complainant has been notified of the appeal outcome and a resolution has been agreed.

IDRP Stage 1 Person B

Following a Stage 1 appeal heard by the Scheme Manager in August 2022, whose decision was not to uphold the complainant's appeal. The complainant raised an

additional point, and it was agreed by the Scheme Manager to review the appeal again once this point had been investigated further by LPPA.

LPPA returned their findings, and a review has taken place which was heard by the Scheme Manager. The complainant has now been notified of the outcome and the Scheme Managers resolution offer. The complainant has accepted the outcome and the case is now closed.

6. REGULATORY CHANGES

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.

6.1. Remedies - Sargeant / McCloud Age Discrimination Case and Matthews

As reported at the previous meeting, in preparation for October 2023 when the regulations will be in place for both Sargeant / McCloud and Matthews CFRS have been focusing these key elements of this project.

6.2. Consultations

Consultation on Sargeant /McCloud Remedy

The consultation closed on 23 May 2023. The LGA & SAB have both responded to the consultation which they shared with CFRS. Their responses are available to view in the Consultations Sections of the [FPS Regulations & Guidance website](#) or the [SAB website](#). CFRS also submitted a response to the Home Office.

Consultation on Matthews – Second options exercise (retained firefighters' pensions)

On the 31 March 2023, The Home Office launched a formal consultation on proposed changes to Firefighters' Pension Scheme (England) 2006 for Retained Firefighters' Pension. The full consultation document can be found -

<https://www.gov.uk/government/consultations/retained-firefighters-pensions>

This consultation focuses on the government's commitment to provide further remedy to those individuals who were employed as retained firefighters between 7 April 2000 and 5 April 2006 inclusive by providing access to the modified section of Firefighters' Pension Scheme 2006 (referred to as 'the modified scheme'). This consultation document contains the proposed amendments to the Firefighters' Pension Scheme (England) Order 2006 and the Firemen's Pension Scheme Order 1992 to achieve this outcome. The document seeks views on proposals for achieving this outcome, and whether the proposed amendments achieve this policy intention for all eligible individuals who meet the criteria of one of the three cohorts.

The consultation closed on 9 June 2023. The LGA, SAB and LPPA have all responded to the consultation which they shared with their clients. CFRS also responded to the consultation. LPPA also raised concerns around volumes, complexity, and reliance on the same key personnel for this exercise as the McCloud remedy, which will pose a challenge for all FRAs and administrators.

Consultation on tax regulation changes for Remedy

On 6 April a set of regulation changes came into effect which modify tax legislation, so the correct tax treatment can be applied when public service pension schemes implement the McCloud remedy.

HMRC have launched a second consultation on further modifications to the regulations. [Draft legislation: The Public Service Pension Schemes \(Rectification of Unlawful Discrimination\) \(Tax\) \(No. 2\) Regulations 2023 \(accessible version\) - GOV.UK \(www.gov.uk\)](#)

HMRC held several round table meetings to allow administering authorities and administrators to raise any technical queries. This consultation closed on 19 June, the LGA & SAB submitted responses and they are available to view [Consultation page](#) of the Scheme Advisory Board website.

HMRC have also published a [newsletter](#) on the McCloud remedy, which covers the latest consultation, the process changes they are looking to develop to support the remedy and guidance they are drafting and are asking for volunteers to assist with testing the guidance.

6.3. Project preparation - Sargeant / McCloud and Matthews

Data collection

Under DCU all eligible FPS 2015 members will be returned to their original legacy scheme for the remedy period in 2015 - 2022. This included taper members regardless of their taper date.

To allow LPPA to rebuild final salary records CFRS was asked to check existing data and provide additional data for all those eligible. For example, an unprotected member who transitioned to FPS 2015 from FPS 1992 on 1 April 2015 and remains in employment will need a final salary record creating for the full seven-year period to be able to offer choice under DCU, equivalent CARE pay records will also need to be created for members protected in the legacy schemes.

This process has been challenging and Officers have been working closely with HR Systems and LPPA. The original data from our administrators was not in a format which was compatible with the way in which we held the records or previously completed the monthly returns to LPPA. The data now needs to be presented in the format that LPPA requires, to enable upload to their new system.

The impact of this is that the data needs to be checked line by line for each eligible member, verifying their service and pay history for each of the 7 years of the remedy period. There are over 16000 lines of data to be checked. This is a time consuming and detailed piece of work, especially where there have been changes such as pay progression, transfers, promotions, etc. This work is ongoing, and we are working closely with LPPA.

Officers have also started to gather service and where possible, pay data, for those eligible under the Matthews remedy. This will entitle those who were in service between April 2000 and March 2006 to purchase service from their start date (the 2nd options exercise). Our records show this may go back to service during the 1960's. Whilst verifying service may be

easier it is unlikely, we will have the pay data prior to 2000. The proposed regulations suggest they might include a formula based on 25% of a wholetime firefighter's pay.

The members FPS website has been encouraging members who may be eligible for the seconds options exercise to complete a form and return it to their FRA. We have received a number of these and have also made them available at each station and we are encouraging colleagues to spread the work.

Data sharing - Interbrigade transfers

As part of the data collection exercise for age discrimination remedy there could be cases whereby information such as pensionable pay and contributions are required from another FRA. This would be when a member has been subject to an inter-brigade transfer during the remedy period.

It was agreed at the Technical Working Group (Pension Administrators / LGA / SAB / FRAs) that the information should be shared with the current administrator instead of the current FRA. For example, it might be West Yorkshire sharing information with LPPA directly. This removes any GDPR issues because the administrator has a legitimate reason for needing the data.

Ill health retirement re-assessments

Late last year the LGA published an ill-health reassessment factsheet ([Age discrimination remedy - Ill Health factsheet \(fpsregs.org\)](#)) to help FRAs identify which members will require a reassessment of their ill-health determination as a result of remedy implementation.

CFRS identified eligible members who met the specified criteria, informed them that they may have an alternative benefit option under retrospective legislation and that this can only be determined by way of reassessment, and sought their permission for such reassessment to take place.

These member's gave permission for CFRS to arrange for an IQMP to provide a view on whether the member's condition, at point of retirement or dismissal, would allow them to qualify for an ill-health pension under the alternative scheme rules. The cases are now with the Occupational Health Service to arrange the reassessments.

This reassessment process will not be detrimental to the member, it is only to enable them to be given a choice of benefits for the remedy period.

The board will be advised on progress with specific reports and verbal updates when appropriate.

7. OTHER MATTERS

7.1. Spring budget 2023

On 15 March 2023, the Chancellor of the Exchequer delivered his Spring Budget 2023. With effect from 6 April 2023, the Finance (No.2) Bill enacted some of the changes announced at the Spring budget [Pensions schemes newsletter 148 — March 2023 - GOV.UK \(www.gov.uk\)](#). This includes:

- increasing the annual allowance from £40,000 to £60,000
- abolishing lifetime allowance (LTA) charges arising in relation to benefit crystallisation events occurring on or after 6 April 2023
- changing the taxation of the LTA excess lump sum, so that it is taxed as pension income (taxable at marginal rate rather than 55 per cent)
- abolishing the LTA charge, ensuring that payments of (or any part of) serious ill-health lump sums, defined benefit lump sum death benefits or an uncrystallised funds lump sum death benefits that would have incurred an LTA charge remain taxable payments, with the excess taxed as pension income (taxable at marginal rate rather than 55 per cent).

Legislation will be introduced in a future Finance Bill to remove the lifetime allowance from pensions tax legislation.

7.2. Commutation on retirement factors and guidance update

Following the announcement of the revised SCAPE rate on the 3 April, the Government Actuary's Department (GAD) published revised commutation on retirement from FPS 1992 factors and guidance.

On 25 May 2023 GAD published the revised CETV factors for fire that are used for non-Club transfers and divorce calculations. The new factors are effective from 29 March 2023. LPPA are uploading these factors to UPM for testing and will be available to use shortly. In the meantime, any urgent cases are being undertaken manually.

7.3. HMT cost control mechanism

Public sector schemes contain a cost control mechanism, designed to offer protection to employers or taxpayers. If the cost of providing members' benefits is more expensive than anticipated, members have to meet that cost through increased contributions or reduced benefits, whereas if the cost is lower members can benefit from enhanced benefits or reduced contributions.

HM Treasury have published a written ministerial statement which confirms only the cost of the reformed scheme (i.e. CARE scheme) will be included in the cost control mechanism. Any costs increase associated with the final salary benefits and the underpin (the big one being McCloud) will be excluded.

There was previously a challenge by six trade unions (including the FBU) regarding the Government's decision to impose the cost of Remedy on schemes, which the High Court ruled wasn't unlawful. We understand the unions have now been granted permission to appeal the High Court ruling. Despite this it now looks as though the Government's position has changed.

7.4. Club transfers

The Club Transfer memorandum requires the transfer to be calculated on Club terms if the member requests the transfer within 12 months of joining the new scheme but is silent on what happens if that confirmation is received after 12 months.

The Cabinet Office has clarified that, if there are exceptional circumstances that prevented the member from sending confirmation within 12 months - so for example delays in providing quotes that were outside the member's control a Club transfer may take place outside the 12-month time limit, providing both the transferring and receiving schemes agree. However, the Cabinet Office has confirmed it has no authority to compel schemes to agree to a belated Club transfer.

The Cabinet Office have also confirmed that they intend to issue new Club transfer factors and a revised memorandum, which are expected to come into force on 1 October 2023. The new factors will take into account the SCAPE discount rate change that took place in March and the revised memorandum will include instructions for members impacted by the McCloud remedy.

The current CFRS discretions for consideration of the 12-month time limit under the 2015 Scheme state:

'The Scheme Manager will not exercise this discretion unless there has been an administrative error by the employer or the Pension Scheme Administrator'.

7.5. Pension Dashboards

The Pensions Dashboards Programme published their latest progress update in May 2023. This reiterates that there will be an update on connection times before parliamentary recess in July and that it's important schemes and providers continue to prepare for dashboards. The link to the report can be found [here](#).

Following this, on 8 June 2023 the DWP issued a [Ministerial statement](#) stating there will be a revised connection deadline of 31 October 2026. We expect full details will follow in the update before the end of July. The Pensions Dashboards Prohibition of Indemnification Act 2023 has now received Royal Assent. This means that if a pension scheme fails to comply with dashboard regulations and penalties are imposed, these penalties cannot be reimbursed out of scheme assets.

LPPA began this project of work in January 2023 and will work closely with CFRS to ensure the data is ready for connection, and LPPA will provide regular progress updates. It is LPPA's intention to connect directly to the Pensions Dashboard through an Integrated Service Provider (ISP).

7.6. Training

Board Members continue to be notified of relevant training events (internal and external) as and when they arise and are encouraged to attend.

LGA held a Fire and Police Data Conference in London, on the 17 May 2023. CFRS was represented by an Officer who joined virtually. The purpose of the event was to reflect on why good data is so important for the Firefighters' and Police Pension Schemes. Topics covered included how FRAs could ensure the quality of the data they provide to administrators, the challenges and lessons learned. This links into both McCloud and Matthews data gathering exercises.

The LGA will be holding the Fire Pensions Annual Conference in London on the 19 and 20 September 2023. The full programme and booking information will be available in due course. Members who are interested should save the date.

Client Relationship Manager from LPPA will be joining us to provide an update on their performance, their preparations for Pension Dashboards and other general issues immediately after today's Board meeting.

The training needs assessment questionnaires were circulated in the first quarter of 2023. A training plan for 2023 /24 will be developed and brought to the next meeting.

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. RESOURCE AND FINANCIAL IMPLICATIONS

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 Matthews ruling is expected to result an increase in the cost in the Firefighters' Pension Scheme. GAD are currently working on estimating the possible impact on scheme liabilities and projecting scheme cashflows in future years however, the anticipated increase in costs remains unknown at the moment.

9. LEGAL & EQUALITY IMPLICATIONS

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

APPENDICES:

Appendix 1 – Risk Register as of July 2023

Appendix 2 – LPPA Quarterly Performance Report to March 2023 and Annual Performance Report 2022/23

Appendix 3 – Part 2 Appendix to the Monitoring Report.

Rick Ogden
Chief Fire Officer
20th July 2023

Cumbria Fire Local Pension Board Risk Register at July 2023

Appendix 1

7 RISKS		Jan 2023	July 2023	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>1.7</td> <td>2.4</td> <td></td> </tr> <tr> <td>3 Possible</td> <td></td> <td>2.3</td> <td>1.2</td> <td></td> <td>1.1</td> </tr> <tr> <td>2 Unlikely</td> <td></td> <td>1.3; 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> </tbody> </table>	Impact Likelihood	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Most severe	5 Very Likely			1.6			4 Likely			1.7	2.4		3 Possible		2.3	1.2		1.1	2 Unlikely		1.3; 2.5	1.4	1.5; 2.2		1 Very unlikely				2.6	2.1
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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	→																																					
7	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	→																																					
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12	2.5. Conflicts of Interest	4	4	4	→																																					
13	2.6 Operational disaster	4	4	4	→																																					

CUMBRIA FIREFIGHTERS’ PENSION BOARD RISK REGISTER

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	Scheme Manager & LPPA	<p>Information Security Arrangements</p> <p>There is a risk that the CFRS will experience a significant information security incident.</p> <p>Caused by a concerted cyber attack on CFRS 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>CFRS – Corporate Risk</p> <ul style="list-style-type: none"> CFRS maintains a detailed corporate risk register including the risk associated with Information Security Arrangements. The Scheme adheres to the controls and measures in place detailed within the Corporate Risk Register. All staff within the team have completed the GDPR & Information Security e-learning training which is renewed on an annual basis. All Members have received training on information security. The Scheme Manager is compliant with the requirements of GDPR. Any data breaches by officers within the scheme are reported through CFRS’s data breach processes and also recorded on the Scheme’s breach register. In the event of systems being interrupted, CFRS will implement the relevant Business Continuity Plan to ensure service continuity in a timely manner. Information security controls within the CFRS have strengthened and have been independently assessed in the following three areas: <ul style="list-style-type: none"> GDPR: ‘Substantial Assurance’ Internal Audit opinion June 2019. Cyber Security: ‘Reasonable Assurance’ Internal Audit opinion has just been completed and results are due in September 2023. PSN: Annual Independent PSN Accreditation 	<p>CFRS</p> <ul style="list-style-type: none"> All staff elected Members and Pension Board members are required to complete on-line data security training with a new module launched in 2022/23. <p>Local Pension Partnership Administration (LPPA):</p> <ul style="list-style-type: none"> Activities are underway to refresh the Group’s Cyber Essentials certification together with obtaining Cyber Essentials Plus certification. LPP’s ‘Secure-Score’ is currently delivering improvements, primarily delivered through: <ul style="list-style-type: none"> Increased monitoring alerts and notifications of cyber security events, through use of Microsoft Identity monitoring & Cloud Application Security tooling. Introduction of control policies which manage detection of unsanctioned applications. Reviews of administrative privileges & compliance to Multi Factor Authentication (MFA) Policies.

Cumbria Fire Local Pension Board Risk Register at July 2023

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)			
					<p>confirmed May 2023</p> <ul style="list-style-type: none"> The annual 2021 ICT health check has been successfully completed during July 2022. The report was submitted in support of the PSN accreditation process during February 2023. All National Cyber Security Centre (NCSC) configuration guidance is adhered to where appropriate and assured as part of the PSN process. All NCSC cyber monitoring tools are implemented. in the event of a Cyber Attack CFRS 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. <p><u>Local Pension Partnership Administration (LPPA):</u></p> <ul style="list-style-type: none"> Cyber security risks and controls in place Services are backed up to tape every night and held off site. Disaster Recovery Plan is tested twice yearly. Networks protected by fire walls to prevent unauthorised access. Intrusion Prevention Systems in place and penetration tests completed annually. 	
1.2	Scheme Manager & LPPA	<p>Pension Administration Processes</p> <p>There is a risk of delays in</p>	<p>9 (3x3)</p>	<p>6 (3x2)</p>	CFRS's formal agreement is now in place with Lancashire County Council for the discharge of pension administration functions through the Local Pensions	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 July 2023

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		<p>scheme members entering into pension or receiving other services from the scheme in an untimely manner.</p> <p>Caused by LPPA moving Cumbria Fire pension fund data (Project PACE) over to their new administration system, Universal Pensions Management (UPM), which went live in Dec 2022.</p> <p>This risk could be compounded by organisational restructure within LPPA & personnel changes and the need for retraining.</p> <p>Resulting in customer dissatisfaction with the service.</p>	<p>DOT</p> <p>➔</p>		<p>Partnership Administration (LPPA). This confirms Lancashire will 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.</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>Formal monthly client meetings with representatives from Cumbria Fire and LPPA are being held to discuss and work through the risks, assumptions, issues and decisions.</p>	<p>Scheduled monthly meetings to discuss relevant issues are in place.</p> <p>With increased workloads due to Project PACE it was agreed that the SLA of 95% would be temporarily relaxed.</p> <p>The most recent quarterly Performance report showed an improvement in the performance levels from 60% in the previous quarter to 91% in the quarter to 31 March 2023 however, performance has slipped during April and May to 77.8%. These variations are largely due to the impact of operational pressures of moving to UPM in 2022.</p> <p>The following activities may also affect this performance.</p> <ul style="list-style-type: none"> • Fire Service Transition • Sargeant & Matthews <p>LPPA are to be invited to attend the quarterly Board Meetings to provide updates on Project PACE and any other relevant issues.</p>
1.3	Scheme Manager & LPPA	<p>Scheme Member Communication</p> <p>There is a risk that scheme members will not receive appropriate or effectively communications from the</p>	<p>4 (2x2)</p> <p>DOT</p> <p>➔</p>	<p>4 (2x2)</p>	<p>LPPA provide the Scheme's communication with scheme members.</p> <p>The PensionPoint portal (previously 'My Pension Online' - MPO) is a key mechanism through which LPPA communicates with members and work is</p>	<p>There is a member pension portal in place called PensionPoint. LPPA publicise sign up guidance and assistance is available for members.</p> <p>PensionPoint will continue to be promoted by the Scheme Manager and LPPA to attempt to increase take</p>

Cumbria Fire Local Pension Board Risk Register at July 2023

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
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		<p>scheme manager.</p> <p>Caused by not having an effective Communication 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>			<p>ongoing to increase the percentage of members signing up to this.</p> <p>The Delegation Agreement with Lancashire County Council (LPPA) and the Administration, Management and Governance Strategy, both identify communication strategy and activities.</p>	<p>up of this self-serve pensions tool.</p>
1.4	Scheme Manager	<p>Data Quality</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 March 2023, reports data quality of 98.4% for common data and 94.6% for scheme-specific data (a result in line with other Firefighters' Pension schemes).</p> <p>Employer responsibilities are reinforced by officers</p>	<p>Planned improvements to data quality are reviewed and scrutinised on a quarterly basis by the Board.</p>

Cumbria Fire Local Pension Board Risk Register at July 2023

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)			
					through a range of communication channels with the employee/scheme member.	
1.5	Scheme Employer & Scheme Manager	<p>Payment of contributions</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>Sargeant Judgement</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</p>	<p>15</p> <p>(3 x 5)</p> <p>DOT</p> <p>➔</p>	<p>9</p> <p>(3 x 3)</p>	<p>CFRS decided not to implement Immediate Detriment payments and will now wait until the Regulations are in place.</p> <p>The Government has recently consulted on the proposed regulations for the Sargeant / McCloud remedy. They have also been consulting on changes to the HMRC Tax rules to remove some of the tax issue in relation to implementing the remedy.</p>	<p>The Scheme is continuing to monitor announcements relating to Sargeant.</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 July 2023

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)			
		<p>members ahead of legislation may have unintended consequences and significant financial impact including tax liabilities.</p> <p>The risk is compounded by insufficient budget to fund the required remedy and any associated project work costs.</p> <p>There is a risk of not having the remedy data ready to be uploaded for testing by LPPA. This is due to the data not being in a compatible format and having limited resources with appropriate skills who have an understanding of the exercise and also insufficient capacity to adequately review and provide records.</p> <p>There is a risk of legal breaches reportable to the Pensions Regulator; incorrect pension entitlements being calculated for pensioners;</p>			<p>The regulations will be in place for October 2023, when the implementation processes will commence.</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 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 2023/24.</p> <p>Officers holding regular meetings with HR Systems and LPPA in order to understand the complexities and resolve any issues.</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>

Cumbria Fire Local Pension Board Risk Register at July 2023

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
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		and loss of credibility with scheme members and employer.				
1.7	Scheme Employer & Scheme Manager	<p>O'Brien/Matthews Judgement</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 required to comply with required administration processes.</p> <p>This could be caused by employer not having historic employment data for affected members; LPPA/CFRS 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>12</p> <p>(3 x 4)</p> <p>DOT</p> <p>➔</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 & FRSA, following which the LGA provided a summary of the MoU and the second options exercise.</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>The government have recently consulted on the proposed regulations for the implementation of this '2nd options' exercise.</p>	<p>The LGA have released a summary document which provides more information about those in scope and the second options exercise.</p> <p>The relevant regulations are being drafted and will provide a further update when more information is known.</p> <p>The Scheme will be working closely with LPPA to identify what additional workload is required.</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> <p>Officers have carried out some work in line with a request from the LGA, which has allowed the identification of the potential numbers in scope.</p> <p>Officers have also arranged for the retention of historical employment data wherever possible and to retain this data during the LGR process, so that CFRS will</p>

Cumbria Fire Local Pension Board Risk Register at July 2023

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)			
		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>continue to have access. Officers have commenced the process of checking and verifying service history and pay data where available.</p> <p>The Government consultation suggested that where there is the lack of historical pay data then 25% of a wholetime Firefighter's pay may be used. CFRS has assessed this % and consider this to be a reasonable solution.</p> <p>Steps have also been taken to identify all those in scope and to encourage all those who may be in scope to get in touch to ensure they are on our list.</p>

Cumbria Fire Local Pension Board Risk Register at July 2023

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>Pensions Regulator Intervention</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 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>Regulatory Changes</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 July 2023

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)			
		<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>Financial Irregularity</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 CFRS.</p>	<p>6</p> <p>(2 x 3)</p> <p>DOT</p> <p>➔</p>	<p>6</p> <p>(2 x 3)</p>	<p>Fraudulent Activity – 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>Unintentional overpayments – 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 have now resolved one outstanding case. The next set of results from this biennial exercise are expected in early 2023 (not yet published).</p> <p>To help mitigate this risk LPPA have agreed to introduce regular contact with those in receipt of injury allowances to remind them to declare DWP benefits. Initial letters are being sent out and a further update will be provided.</p>

Cumbria Fire Local Pension Board Risk Register at July 2023

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>Loss of key personnel</p> <p>There is a risk that the scheme manager may lose key personnel.</p> <p>This risk has changed following the recent change of Governance from CCC to PFCC.</p> <p>A large amount of work on Fire Pensions is undertaken via the Pay and Reward service which is hosted in Westmorland and Furness and a number of other hosted services across W&F and Cumberland Council. There is a risk that the disaggregation of these hosted functions will result in the withdrawal of support to CFRS without sufficient funding or resource to replace this. This will create a significant impact in terms of capacity challenges in CFRS and key gaps in expertise, skills and knowledge.</p>	<p>16</p> <p>(4 x 4)</p> <p>DOT</p> <p>↓</p>	<p>16</p> <p>(4 x 4)</p>	<p>One key individual transferred in to CFRS to specifically focus on Pensions.</p> <p>The hosted services which currently support Fire Pensions are:</p> <ul style="list-style-type: none"> • Pay and Reward • Legal • Payroll • HR Systems • Finance <p>Draft Service Level Agreements are in place with all hosted services (still to be finalised) to ensure continuity of service. Plans will be developed for longer term disaggregation and more permanent solutions.</p>	<p>There is a disaggregation board being set up to oversee the overall disaggregation of hosted services. There are also a number of subgroups / oversight boards for the specific areas. Any concerns about TUPE implications or loss of skills and expertise will be escalated as required.</p>


Cumbria Fire Local Pension Board Risk Register at July 2023

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)			
		This is likely to have a significant impact at this time particularly due to the large and complex projects relating to Sargeant and Matthews.				
2.5	Scheme Manager	<p>Conflicts of interest</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 Scheme Manager or the CFRS.</p>	<p>4</p> <p>(2 x 2)</p> <p>DOT</p> <p>➔</p>	<p>4</p> <p>(2 x 2)</p>	<p>Fire Local Pension Board: all members have signed up to the Board's Code of Conduct and Conflicts of interest policy. At each meeting, members are asked to disclose any changes to their situation.</p> <p>All interests are recorded and published on the CFRS'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 CFRS's Monitoring Officer.</p>
2.6	Scheme Manager & LPPA	<p>Operational Disaster</p> <p>There is a risk that an operational disaster may impact onto the Scheme.</p>	<p>4</p> <p>(4 x 1)</p>	<p>4</p> <p>(4 x 1)</p>	<p>CFRS: Business continuity procedures are in place for the scheme manager. These are tested corporately on a regular basis in accordance with CFRS policies and procedures.</p>	<p>The existing procedures are considered appropriate to mitigate the risk of operational disaster, but this position will be kept under review.</p>

Cumbria Fire Local Pension Board Risk Register at July 2023

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)			
		<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>	DOT 		<p>Where weaknesses are identified, these are addressed appropriately to improve the Scheme's preparedness for operational disaster.</p> <p>Administration (LPPA): 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>	

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.

LPP

Local Pensions Partnership
Administration

Cumbria Fire & Rescue Service

Administration Report – Annual Appendix

1st April 2022 – 31st March 2023

lppapensions.co.uk



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ANNUAL SUMMARY

During 2022-23 LPPA completed a significant change programme to implement a new pension administration system. This also involved rationalising other historic systems and moving to a new operating platform.

The reason for this decision was to partner with a supplier who had a technology roadmap aligned to our own. This was the most transformational activity LPPA had undertaken and understandably resulted in challenges. The transition from the old system to the new platform was carried out over a phased basis.

Some of the challenges were pre-empted and resulted in relaxing SLAs with partners during the implementation periods as is shown in this document.

Pensions in payment continued to be paid on a monthly basis, thus meeting the expectations of members and employers.

Forward thinking...
Working together...
Doing the right thing...
Committed to excellence...

Digital Transformation



Casework Performance Against SLA

In this section...

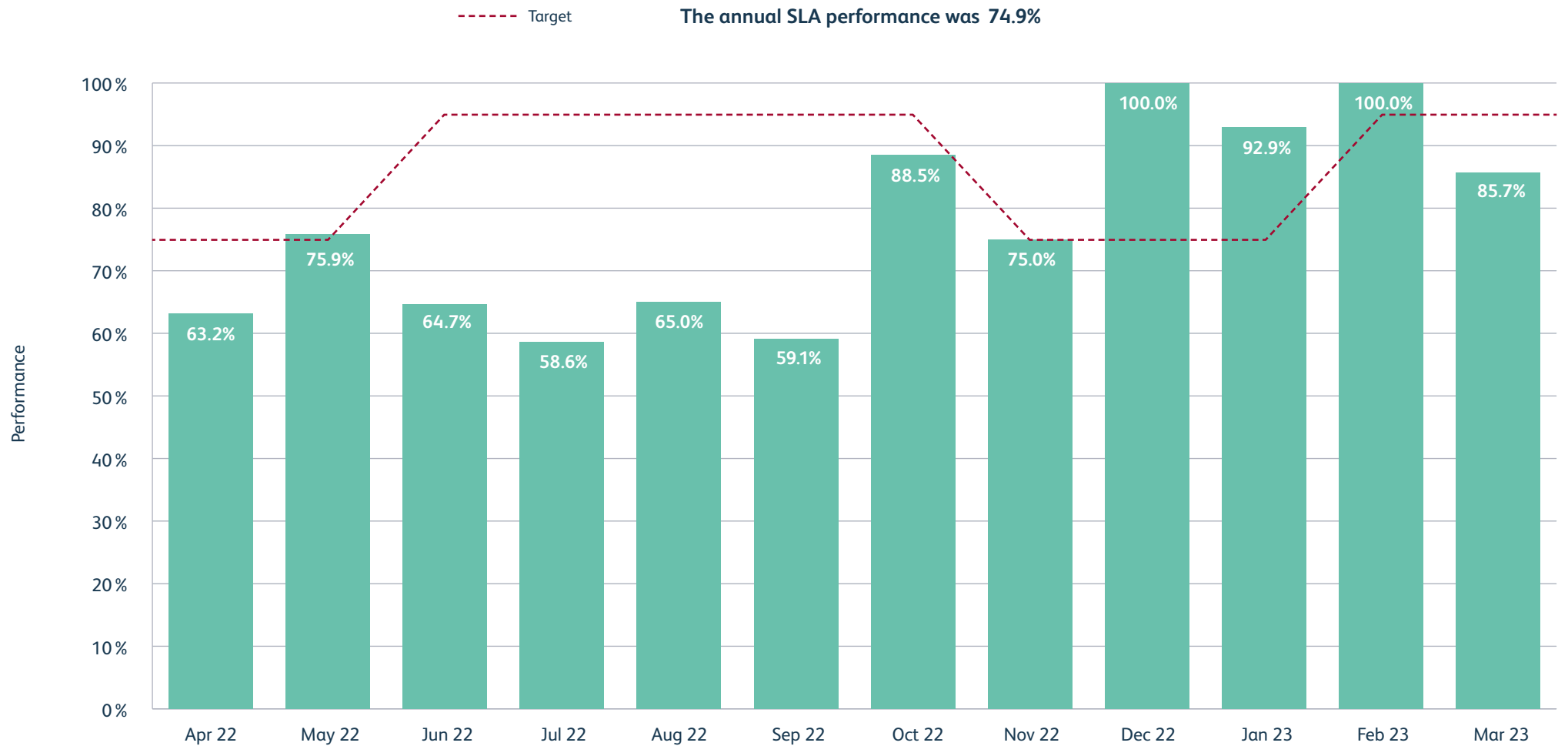
- Performance – All cases
- Performance Standard

CASEWORK PERFORMANCE AGAINST SLA



PERFORMANCE – ALL CASES

CLIENT SPECIFIC

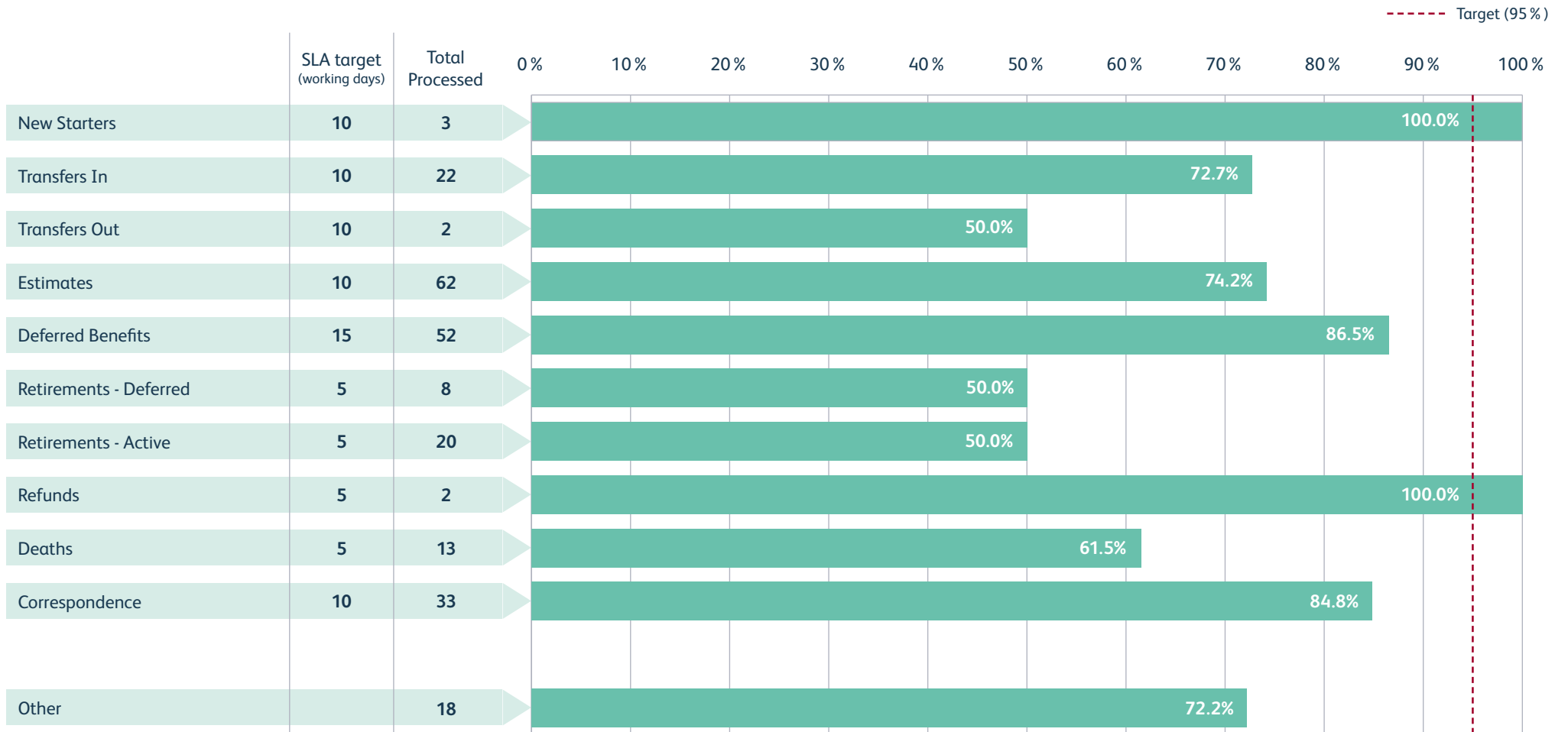


CASEWORK PERFORMANCE AGAINST SLA



PERFORMANCE STANDARD

CLIENT SPECIFIC



Employer Engagement & Communication Activity

In this section...

- Delivered
- Engagement communications

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



DELIVERED – QUARTER 1

ALL LPPA

1. Getting ready for retirement - an email is sent once we have received a member's intention to retire. It advises them of the process and gives them the option to download a retirement checklist and to watch LPPA's [retirement video](#)
2. Member surveys - emails are sent after retirement, helpdesk interactions, bereavements, and joining the scheme, to allow LPPA to gather feedback and continue to improve the experience across the processing teams
3. P60 emails have been issued to retired members, explaining that their P60s are available to view through their online portal (paper copies have been issued to members who requested them)
 - [Pension Point P60 email](#)
 - [My Pension Online email](#)
4. ABS emails for deferred members started to be issued in Q1, before active members are scheduled to receive them in Q2. The email explained that their Annual Benefit Statements is available to view in their online portal ([My Pension Online example](#))
5. Spring newsletter – this was made available in a new online format for retired members, and emailed to contactable retired members.
[View spring newsletter \(retirees\)](#)
6. [Additional member video guides](#) (LPPA website) – these have been added to the LPPA YouTube channel including 'How to use the PensionPoint Retirement calculators' (videos have been important in supporting the launch of PensionPoint, the new online member portal)
7. Welcome to the Engagement Team email – this was issued and introduced some new LPPA team members and how they can offer employer support.
[View Engagement Team email](#)
8. Pension Pulse employer newsletters sent out in April and May
 - [April Pension Pulse](#)
 - [May Pension Pulse](#)

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



DELIVERED – QUARTER 1 CONTINUED

ALL LPPA

9. A new employer training page has been created and included on the LPPA website (making it easier for employers to book ongoing training sessions).

[View new training page](#)

The Employer Engagement team has continued to deliver employer support sessions including:

10. Scheme Leavers Essentials training – for any employers in need of support with submitting leaver details to LPPA, this session cover what to do and how to do it
11. LGPS Scheme Essentials – for any employer that wants more knowledge of the LGPS pension scheme and support with calculating final pay, CARE pay and Absence and Pensionable Pay
12. Year-end file submission training and support for UPM employers

There have also been training sessions delivered to members (all bookable via the LPPA website member training page) including:

13. Making Sense of your Pension (online sessions) - these are aimed at members to help improve their knowledge of their LGPS pension, whether they have recently joined the scheme, or have been in the scheme a while
14. Making Sense of Retirement (online sessions) – these are aimed at Members who are reaching retirement age (age 55 and over) to help improve their knowledge of the retirement process and claiming their LGPS pension

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



DELIVERED – QUARTER 2

ALL LPPA

1. [Getting ready for retirement email](#) – issued when LPPA have received a member’s intention to retire. It advises them of the process and gives them the option to download a retirement checklist and watch LPPA’s retirement video.
2. Member survey emails – issued following completion of several processes including retirement, helpdesk interactions, bereavements, and joining the scheme, to allow LPPA to gather feedback and continue to improve the member experience across the business.
3. ABS activity (active and deferred members) – ABS communications activity with active and deferred members receiving email notification that their ABS was available via their online member portal. Those who chose to receive their ABS in the post, received them by the end of August 22 (statutory deadline).
4. [Active/deferred member newsletter](#) – in a new online format, which allows members to view and share articles in an easy-to-read, mobile-friendly format.
5. Member Sessions – all bookable via the LPPA Member Training page, including:

Making Sense of your Pension

These online sessions are aimed at members to help improve their knowledge of their pension, whether they have recently joined the scheme, or have been in the scheme a while.

Making Sense of Retirement

These sessions are aimed at Members who are reaching retirement age (55 and over) to help improve their knowledge of the retirement process and claim their pension.

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



DELIVERED – QUARTER 2 CONTINUED

ALL LPPA

6. Employer Communications - various emails have been sent to employers including:
 - [Teams training dates email](#) – promoting training sessions to help employers and members get a better understanding of pension processes
 - [Address reminder email](#) – reminder emails issued to employers (address to return member documents to LPPA, link to example is for Lancashire employers)
 - Various PACE planning emails, including [Road map](#) (Lancashire fund example) and [training dates](#) communications
 - Pension Pulse employer bulletin sent out in [July](#) and [September](#)
7. During Q2 the Engagement team supported several LG Fund clients in their valuation activities, as well as delivering training to employers in readiness for the Phase 2 launch of UPM and the new employer portal (from October through to December). This included:
 - UPM employer portal system navigation
 - Submitting monthly returns (process and new template)
8. The Employer Engagement Team launched an online Employer Panel, with employers registering to be part of the panel. The first panel meeting included discussions around the employer training requirements, and how the LPPA website can be used to support their activities.
9. Ongoing Website Development – updates to the LPPA website are ongoing, additional content in Q2 included:
 - [New PACE page created \(with timeline included\)](#)
 - [New submitting employer information page](#)

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY

DELIVERED – QUARTER 3

ALL LPPA

1. An [email](#) was issued to members of the LPPA member panel to share results of a survey focusing on the new online newsletter (active and deferred members), whilst also asking for feedback on the FAQ (Frequently Asked Questions) section of the LPPA website.
2. [Help Hub](#) was launched on the LPPA website, a new member help and support section that consolidates all resources (FAQ's, videos, forms and documents, training) into one easily accessible area. The 'search' function has also been improved so that members can access the information they need quicker and easier.
3. [News Hub](#) was launched at the same time, a website page that enables quick and simple access to all LPPA new articles, blogs and research stories. It also includes links to all the latest LPPA newsletters.
4. The [LPPA employer toolkit page](#) was made available to help all employers communicate the benefits of PensionPoint to their members in the workplace. This includes access to content for internal emails, posters and intranet articles.
5. Member Sessions were delivered, all bookable via the LPPA Member Training page, including:

Making Sense of your Pension

These online sessions are aimed at members to help improve their knowledge of their pension, whether they have recently joined the scheme, or have been in the scheme a while.

Making Sense of Retirement

These sessions are aimed at Members who are reaching retirement age (age 55 and over) to help improve their knowledge of the retirement process and claim their pension.

6. [Emails](#) were issued to clients and employers to highlight planned maintenance days and details of system downtime (w/c 31 Oct, with reminders issued w/c 14 and 21 Nov).



EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



DELIVERED – QUARTER 3 CONTINUED

ALL LPPA

7. [Pension Pulse](#) (employer newsletter) was issued in Q3, with features on UPM employer portal training, industry news and links to LGA bulletins.
8. [Training invites](#) were issued both to employers who are currently providing monthly data returns, as well as those which will be submitting from May 23 (training is scheduled every two weeks throughout 2023). The communication also provided employers with access to the monthly returns [online support page](#).
9. Details of the LPPA Christmas opening hours were provided to clients ([email](#)) and employers / members on the LPPA website.

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY

DELIVERED – QUARTER 4

ALL LPPA

1. A [member panel email](#) was issued, asking for feedback on the new LPPA Help Hub, which was launched in December on the LPPA website.
2. Emails, to a cross-section of members from all clients, inviting them to [join the member panel](#) were sent out in January.
3. A pension increases web page was created to update members on the latest pension increases.
4. Further website developments (additional pages) went live in Q4 including:
 - [New Joiners](#)
 - [Member contribution rates \(23/24\)](#)
 - [Additional Pension Contributions \(APC\)](#)
 - [Pension pay dates \(23/24\)](#)
 - [Updating Your Bank Details](#)
 - [Retirement Guide for Leavers](#) (updated)
 - [Tier 3 Ill Health Retirement](#) (updated)
5. In preparation for McCloud remedy, [further communications](#) were issued to fund employers to ensure that historic data submissions have been accurately supplied (specifically hours worked and service break data).
6. A [McCloud roadmap webpage](#) was also created for our clients.
7. [Several bite-sized video FAQs](#) were developed to help answer some of the more popular member questions, including opting out, and information on the 50:50 option.
8. New Frequently Asked Questions (FAQs) were added to the LPPA website, following the Spring Budget, [including updates on Lifetime Allowance \(LTA\) and annual allowance](#). A news story was also added to the [website](#).
9. The automated Helpdesk (recorded) message was updated to include details of how to access P60 documents for retired members (from April).
10. [A joint press release was issued with Civica](#), following the completed switch to the UPM administration platform.
11. LinkedIn posts were issued in Q1 covering a wide range of topics including:
 - Pension health checks
 - LPPA's Cyber Essentials Plus certification
 - Pension increases
 - Safer internet day
 - PensionPoint ('register to enjoy the benefits')
 - Employer Monthly Return training
 - LGBT history month
 - Chinese New Year
 - '100,000' members registered on PensionPoint
 - International Women's Day
 - LPPA Client forum
 - Spring Budget (2023)
 - Monthly Returns

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



DELIVERED – QUARTER 4 CONTINUED

ALL LPPA

- Happy Easter
 - Happy Ramadan
12. [Pension Pulse bulletin](#) – a UPM special was issued to employers in January, followed by a [‘financial year end’](#) special in March.
13. Employer training sessions were delivered with a focus on monthly returns and navigating the UPM employer portal, including:
- UPM employer portal training (sessions to support with general navigation and submitting the monthly return data file)
 - Monthly Return Training – regular training sessions available for employers to attend, with a demonstration of the upload of Monthly Return file via UPM employer portal.
 - Remote employer visits conducted to support with navigating the UPM employer portal.
 - Employer visits (training sessions and support meetings) continue to be delivered remotely.
14. Member Sessions were delivered, all bookable via the LPPA Member Training page, including:
- Making Sense of your Pension (online sessions are aimed at members to help improve their knowledge of their pension, whether they have recently joined the scheme, or have been in the scheme a while).
 - Making Sense of Retirement (sessions are aimed at Members who are reaching retirement age (age 55 and over) to help improve their knowledge of the retirement process and claim their pension).

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



ENGAGEMENT COMMUNICATIONS

CLIENT SPECIFIC

- 2 virtual visits were held with Cumbria Fire Scheme employer
- UPM employer portal navigation training session held with Cumbria Fire Scheme Employer



EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



EMAILS – EMPLOYERS

CLIENT SPECIFIC

2022

April

- My PensionOnline: Currently Unavailable
- Welcome to the Engagement Team
- Pension Pulse

May

- Pension Pulse
- Scheme leavers training invite
- Have your say with LPPA

June

- PensionPoint promotional email
- Project PACE - getting ready for our new pension administration system
- Employer Panel email
- LPPA address reminder

July

- Getting ready for your new pension administration system (PACE) / timelines
- UPM employer portal training
- Pension Pulse

August

- UPM employer portal training (reminder)
- Monthly returns submission (update)

September

- UPM employer portal training
- Pension Pulse

November

- Essential system maintenance reminder
- November Pension Pulse
- Planned maintenance reminder

December

- Welcome to UPM / UPM now live
- December opening hours
- Invite: book on monthly returns training

2023

January

- Pension Pulse (UPM Special)
- Monthly data returns training

March

- Pension Pulse

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



EMAILS – MEMBERS

CLIENT SPECIFIC

2022

April

- Pension Estimate: MPO
- P60 / MPO

May

- Member panel email and survey
- Annual Benefit Statement
- Annual pension statement

July

- PensionPoint (live now - follow up)

August

- Summer newsletter (Active members)
- ABS: ready to view

September

- Help us improve PensionPoint

November

- PensionPoint (coming soon)

2023

January

- Member training - Making Sense of Your Pension / Retirement

February

- Member panel / News Hub (small selection across multiple funds)

March

- Member panel / invitation (small selection across multiple funds)

LPP

Local Pensions Partnership
Administration



LPP

Local Pensions Partnership
Administration

Cumbria Fire & Rescue Service

Quarterly Administration Report

1st January – 31st March 2023

lppapensions.co.uk

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DEFINITIONS

Page 9

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.

Page 10

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 12

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 13

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 'Member Online Portal' registration queries
- P60 queries
- 50/50 scheme changes
- APC / AVC 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 15 & 16

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.

All figures reported in this section are non-client specific, as not all member calls are dispositioned at client level. This means that call volumes and wait times are not at client level - however, as calls are answered (through our various IVR options) in relation to wait time, performance across all LPPA clients is broadly the same

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 18 & 19

Customer Satisfaction Scores

The overall Helpdesk and Retirement satisfaction scores includes the percentage of people who provided a satisfied or neutral response.

Page 21

Member Online Portal

The number and % of Members that are registered for the Member Online Portal, including a quarterly view.

Page 28

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

 COMPLETED
  DUE

	Apr 22	May 22	Jun 22	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23
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							✓					

EXECUTIVE SUMMARY

Forward thinking...
Working together...
Doing the right thing...
Committed to excellence...

This performance report covers the reporting period of Q4 2022/23 (January – March 2023)

The second phase of the PACE migration to move to our new pensions administration system is now complete.

To help us manage this significant change programme, we agreed a period of temporary relaxed SLAs for all clients between March – May 2022 and then again between November – January 2023.

The usual overall SLA target is 95 %, and this target was relaxed as follows:

- High priority relaxed SLA for 3-months post go live (relaxed to 90 % target SLA)
- Other cases relaxed SLA for 3-months post go live (relaxed to 70 % target SLA – with the exception of no breach in statutory deadlines, disclosure or a guarantee period)
- Ill-health estimates/retirements prioritised
- Helpdesk call and web form wait times are likely to increase and we will manage this by proactively updating messages on our website, in the IVR when we receive calls and when a web-form is submitted to us

PRIORITY	CASE TYPE
HIGH	Deaths • Retirements deferred • Retirements active
OTHER	New Starters • Refunds • Transfers Out • Transfers In Divorce • Aggregation • Deferred Benefits • Estimates – member Estimates – employer • Correspondence

Payroll

No disruption to pensioner payroll or lump sum payments (this equates to over £100m, across all clients, in pension payments per month).

Statutory Deadlines

No statutory deadlines were due during the period.

Casework SLA Performance

Casework performance for the period was impacted by the final Phase 2 Pace migration, and this migration contained the largest number of clients in a single go live (5 clients). The spikes in work created by the migrations adversely impacts performance. Relaxed SLAs applied through to the end of January to support Pace transition.

As outlined in previous quarterly performance reports, casework performance measures to the end of Q3 from UPM were not directly comparable with how they were measured from the previous system and were in excess of contractual obligations. Significant activity has taken place to ensure that we can measure performance in line with contractual obligations. The Q4 performance report is now measuring performance in line with contractual obligations.

EXECUTIVE SUMMARY CONTINUED

Satisfaction Scores

Helpdesk satisfaction scores has reduced slightly during the period. At the end of Q3, satisfaction was 80%, at the end of Q4 satisfaction was 78%.

Retirement satisfaction scores remained the same during the period. At the end of Q3, satisfaction was 64%, at the end of Q4 satisfaction was also 64%. Satisfaction scores have been impacted by the phase 2 migrations and spikes in work which we currently have plans in place to work through.

Pensions Helpdesk

Helpdesk performance for the period has seen average wait times remain slightly higher, average 9 minutes, than our non-contractual target of 4 minutes. In January the average wait peaked at 10 minutes as performance was adversely impacted by higher call volumes at the start of the month, driving up average wait times.

Forward thinking...
Working together...
Doing the right thing...
Committed to excellence...



Fund Membership

In this section...

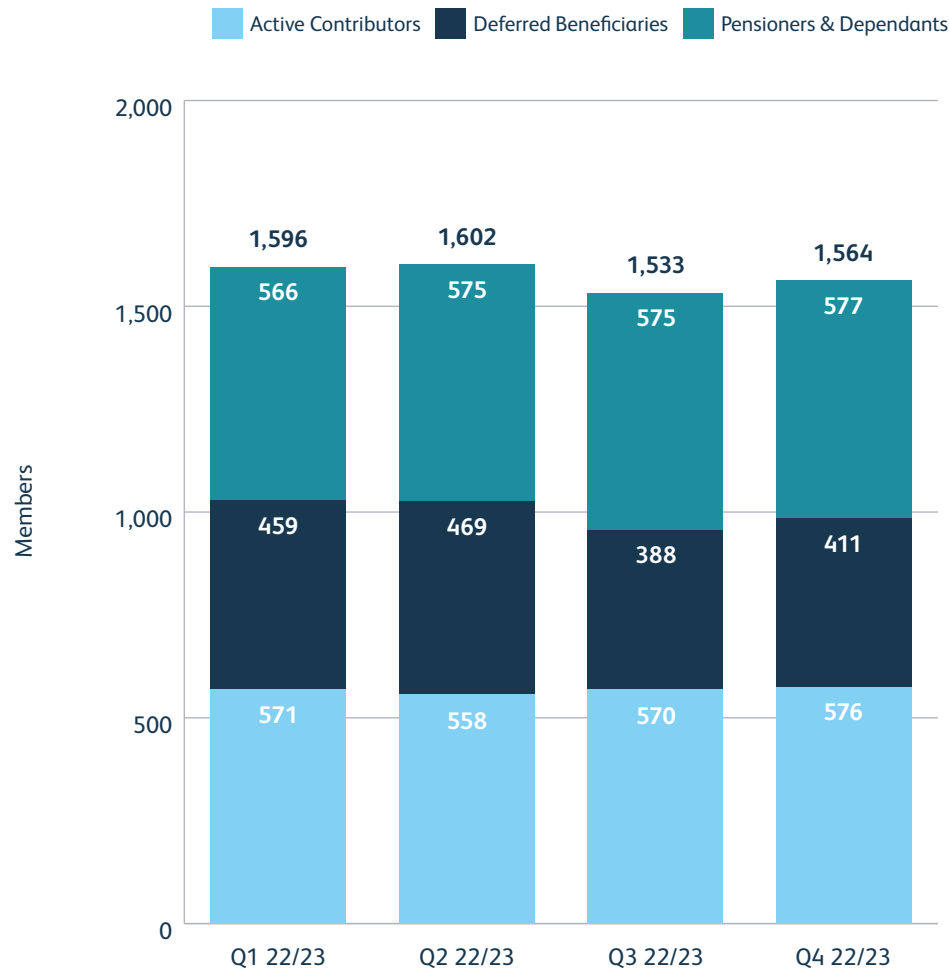
- Total Fund membership
- Scheme Breakdown
- Current Age Demographic

TOTAL FUND MEMBERSHIP



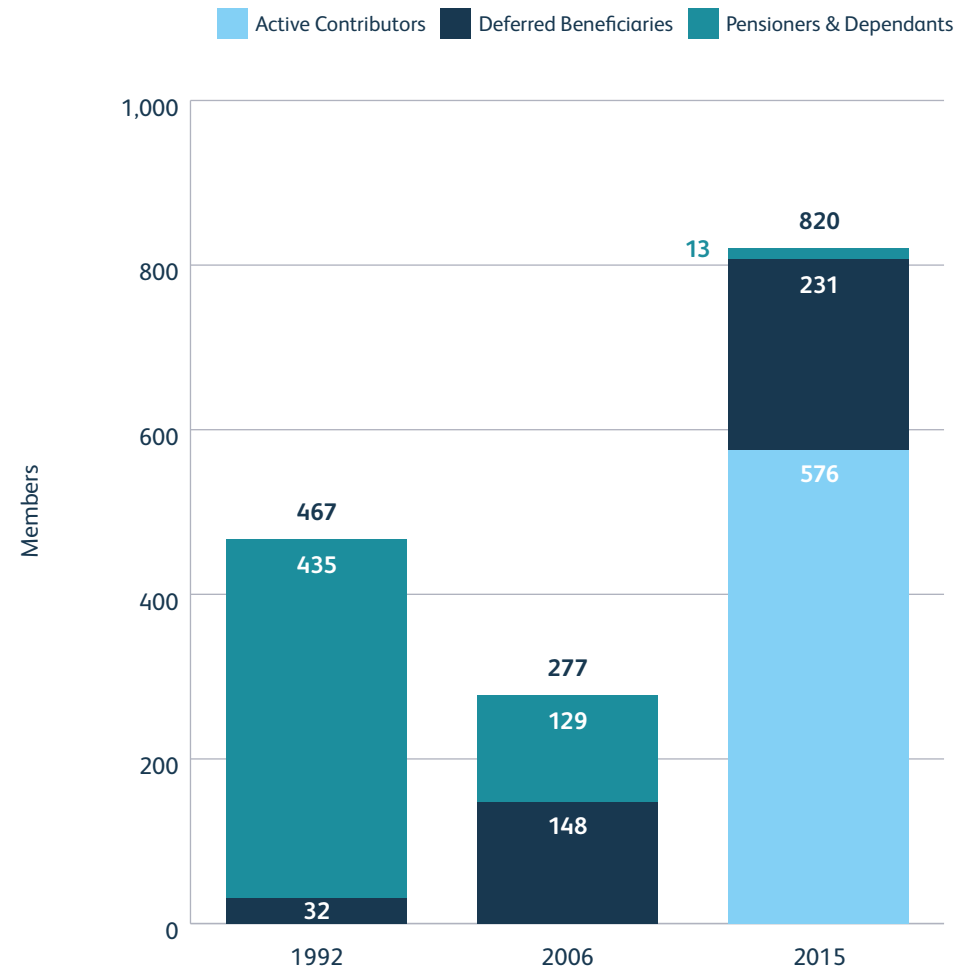
TOTAL FUND MEMBERSHIP

CLIENT SPECIFIC



SCHEME BREAKDOWN

CLIENT SPECIFIC

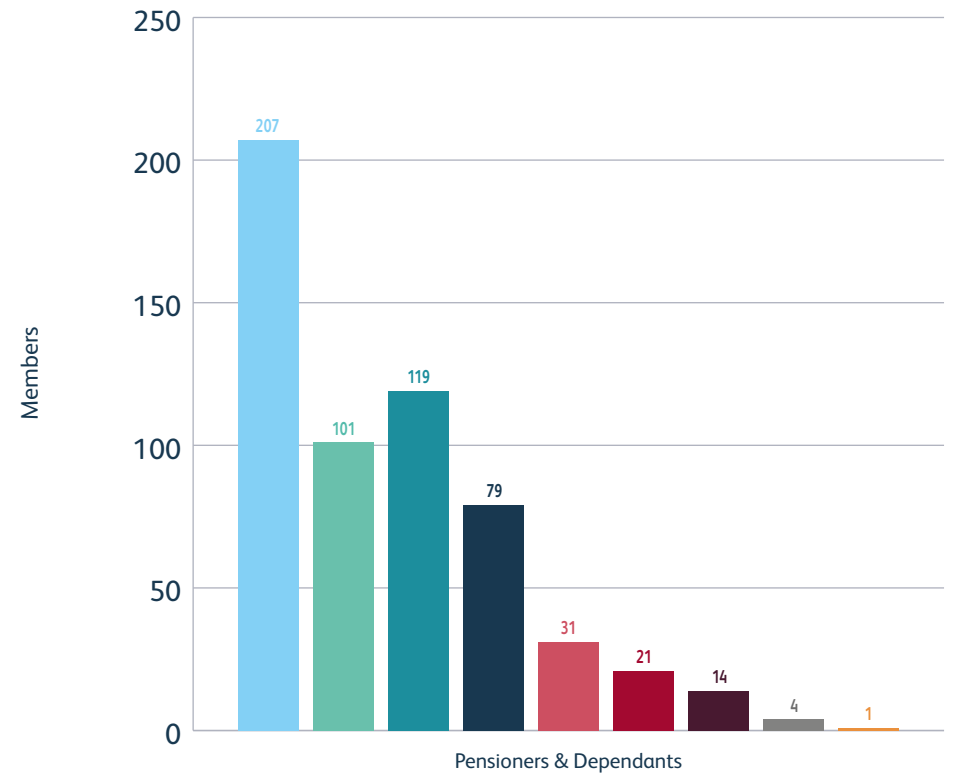
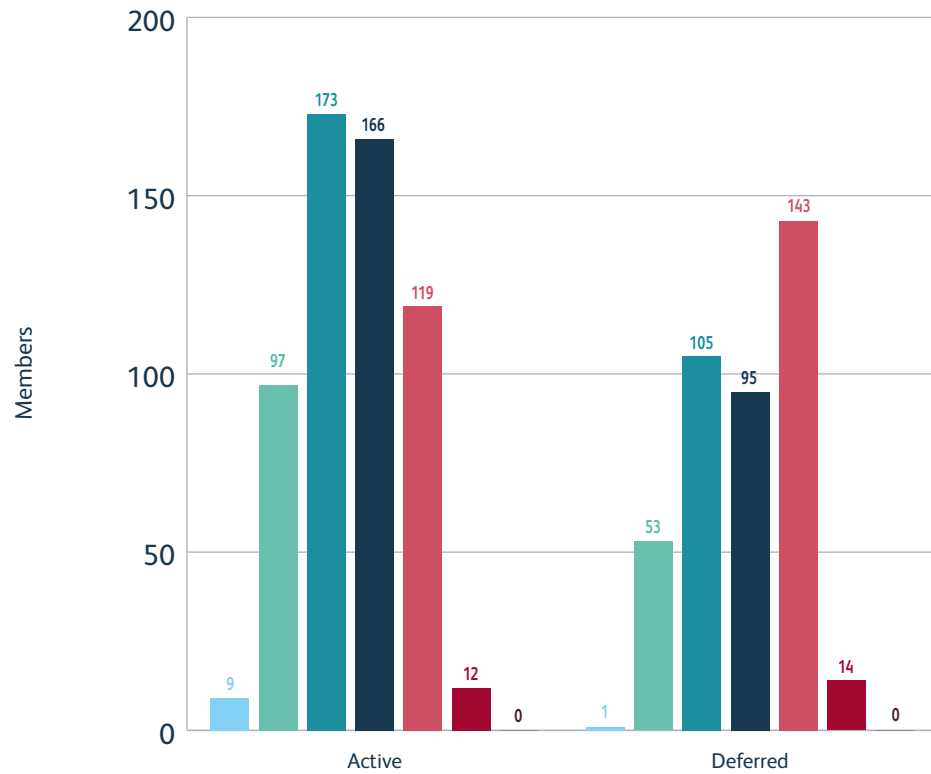
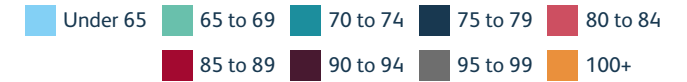
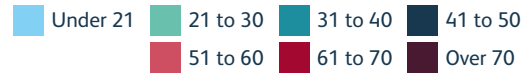


TOTAL FUND MEMBERSHIP



CURRENT AGE DEMOGRAPHIC

CLIENT SPECIFIC



Casework Performance Against SLA

In this section...

- Performance – All cases
- Performance Standard

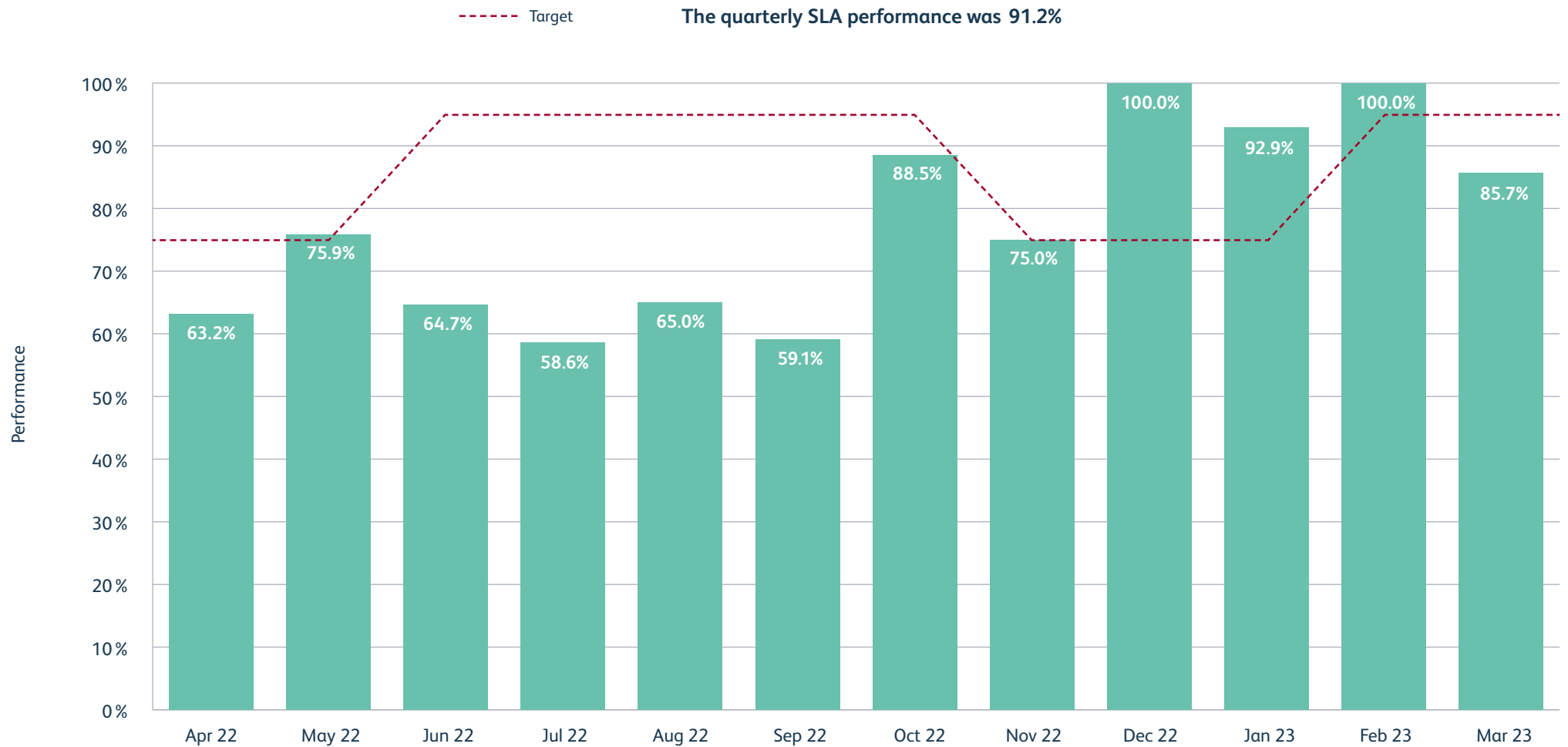
CASEWORK PERFORMANCE AGAINST SLA

For annual data, please see the **Annual Appendix – page 5**



PERFORMANCE – ALL CASES

CLIENT SPECIFIC



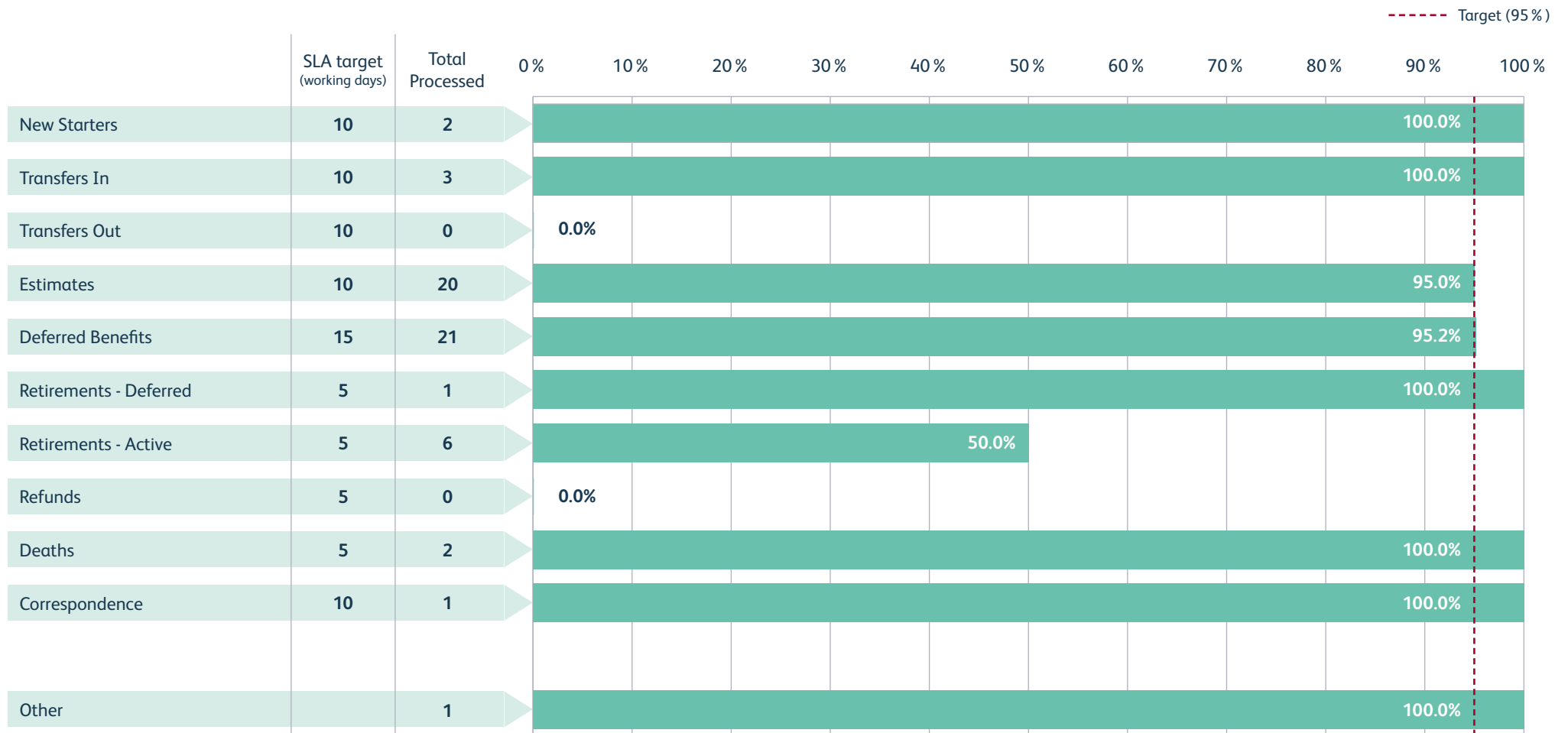
CASEWORK PERFORMANCE AGAINST SLA

For annual data, please see the **Annual Appendix – page 6**



PERFORMANCE STANDARD

CLIENT SPECIFIC



Helpdesk Calls Performance

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

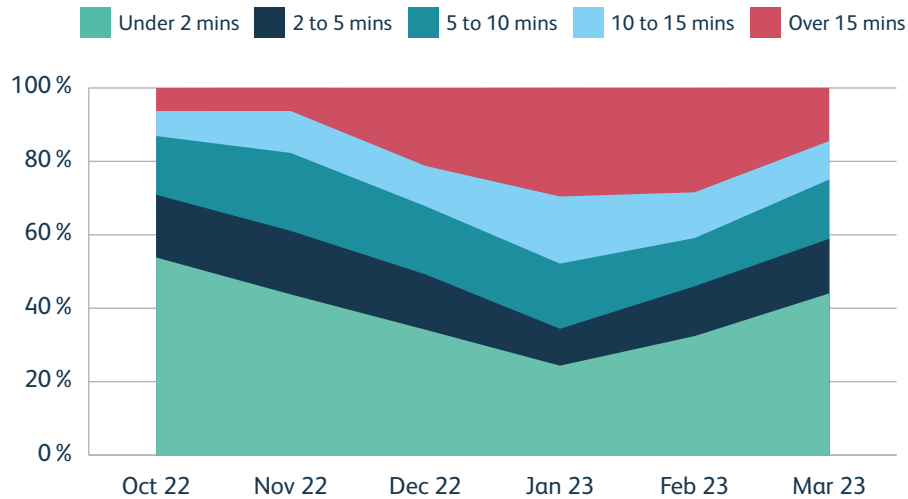
In this section...

- Wait time range
- Calls answered (%)
- Total calls

HELPDESK CALLS PERFORMANCE

WAIT TIME RANGE

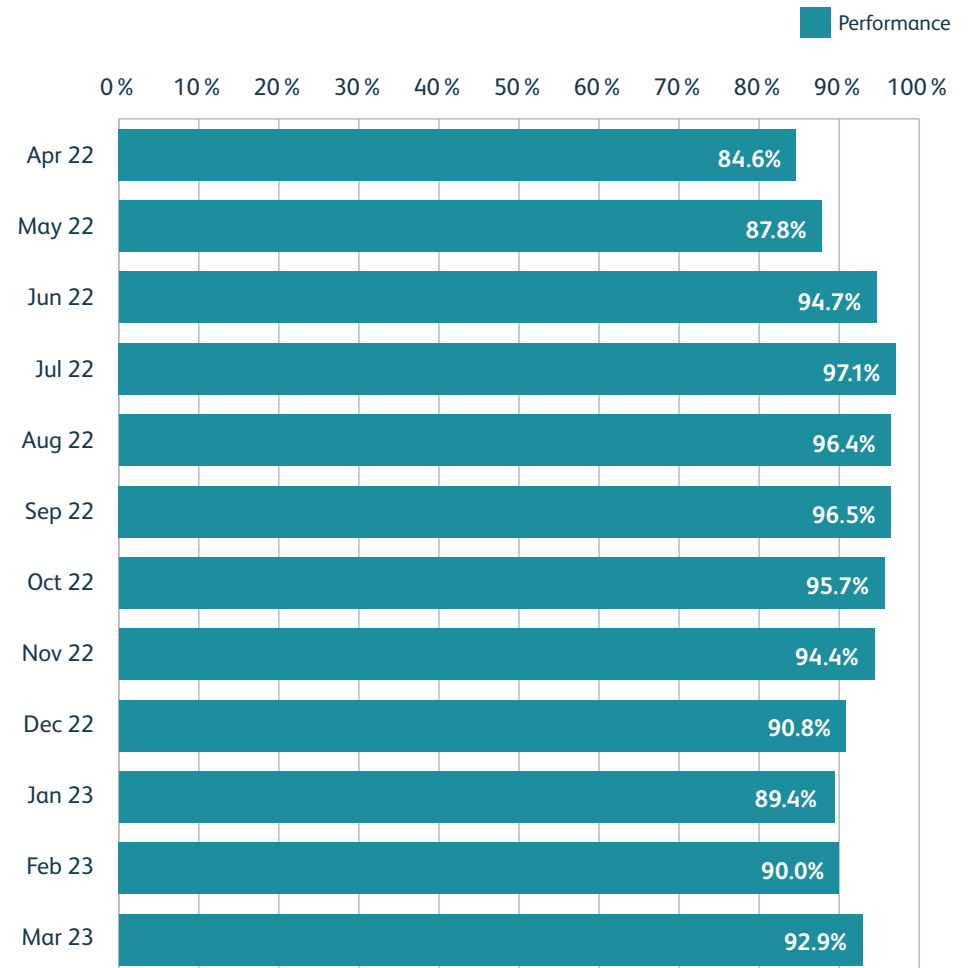
ALL LPPA



	Under 2 mins	2 to 5 mins	5 to 10 mins	10 to 15 mins	Over 15 mins
Oct 22	53.8%	17.1%	16.0%	6.8%	6.3%
Nov 22	43.8%	17.3%	21.2%	11.4%	6.3%
Dec 22	34.2%	15.1%	18.6%	11.0%	21.2%
Jan 23	24.4%	10.0%	17.8%	18.3%	29.6%
Feb 23	32.4%	13.6%	13.1%	12.5%	28.4%
Mar 23	44.1%	14.9%	16.1%	10.5%	14.5%

CALLS ANSWERED (%)

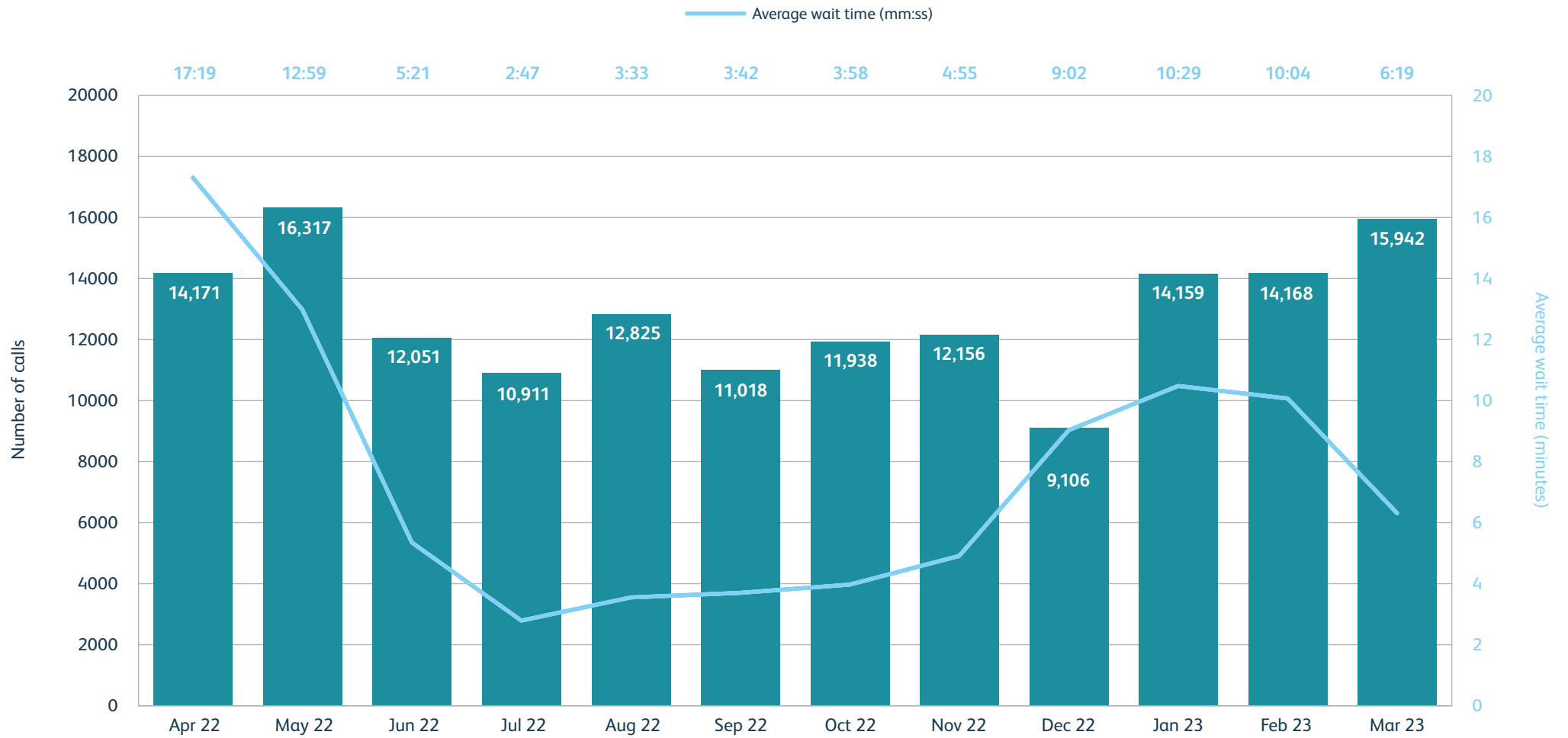
ALL LPPA



HELPDESK CALLS PERFORMANCE

▾ TOTAL CALLS

ALL LPPA



Customer Satisfaction Scores

In this section...

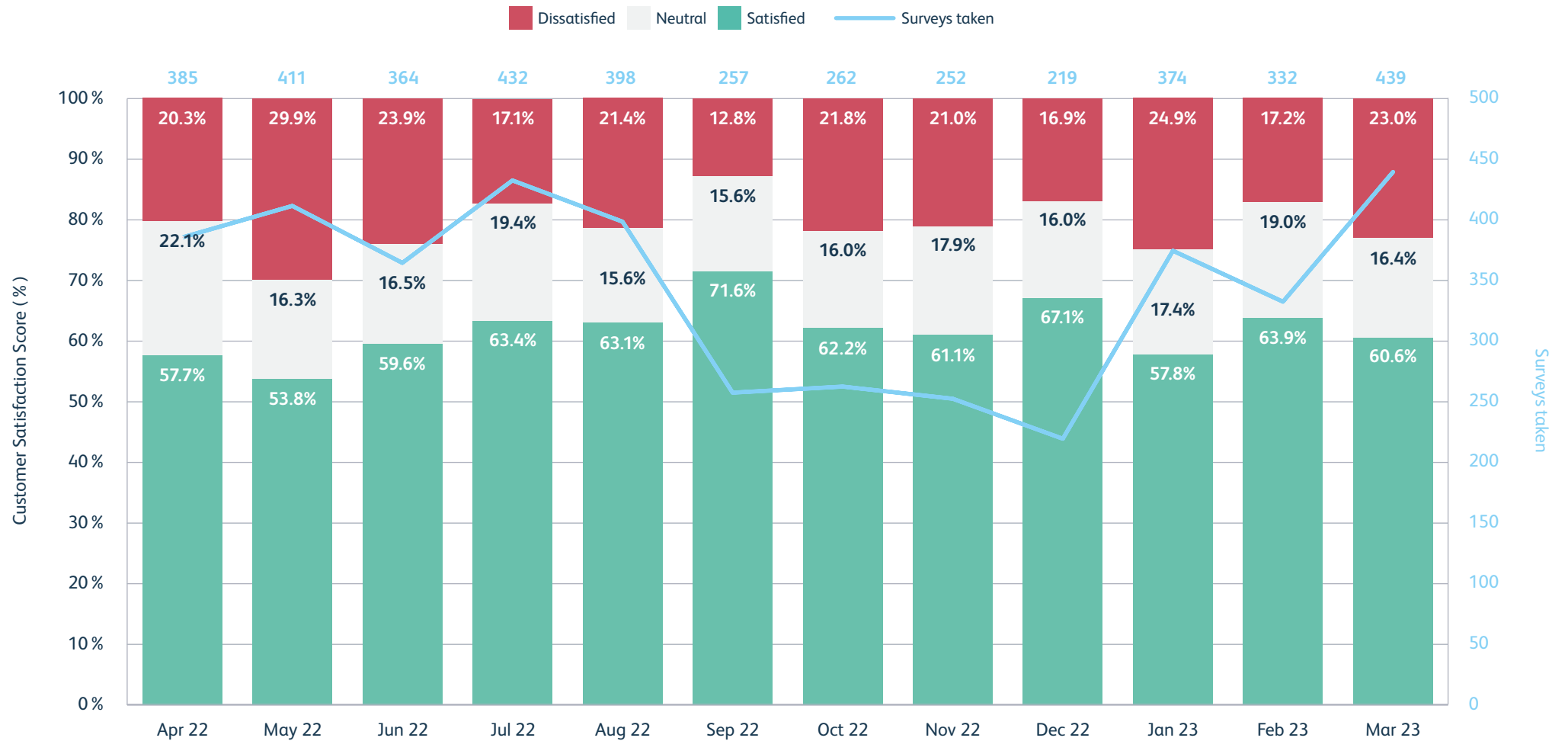
- Helpdesk calls satisfaction
- Retirements

CUSTOMER SATISFACTION SCORES



HELPDESK CALLS SATISFACTION

ALL LPPA

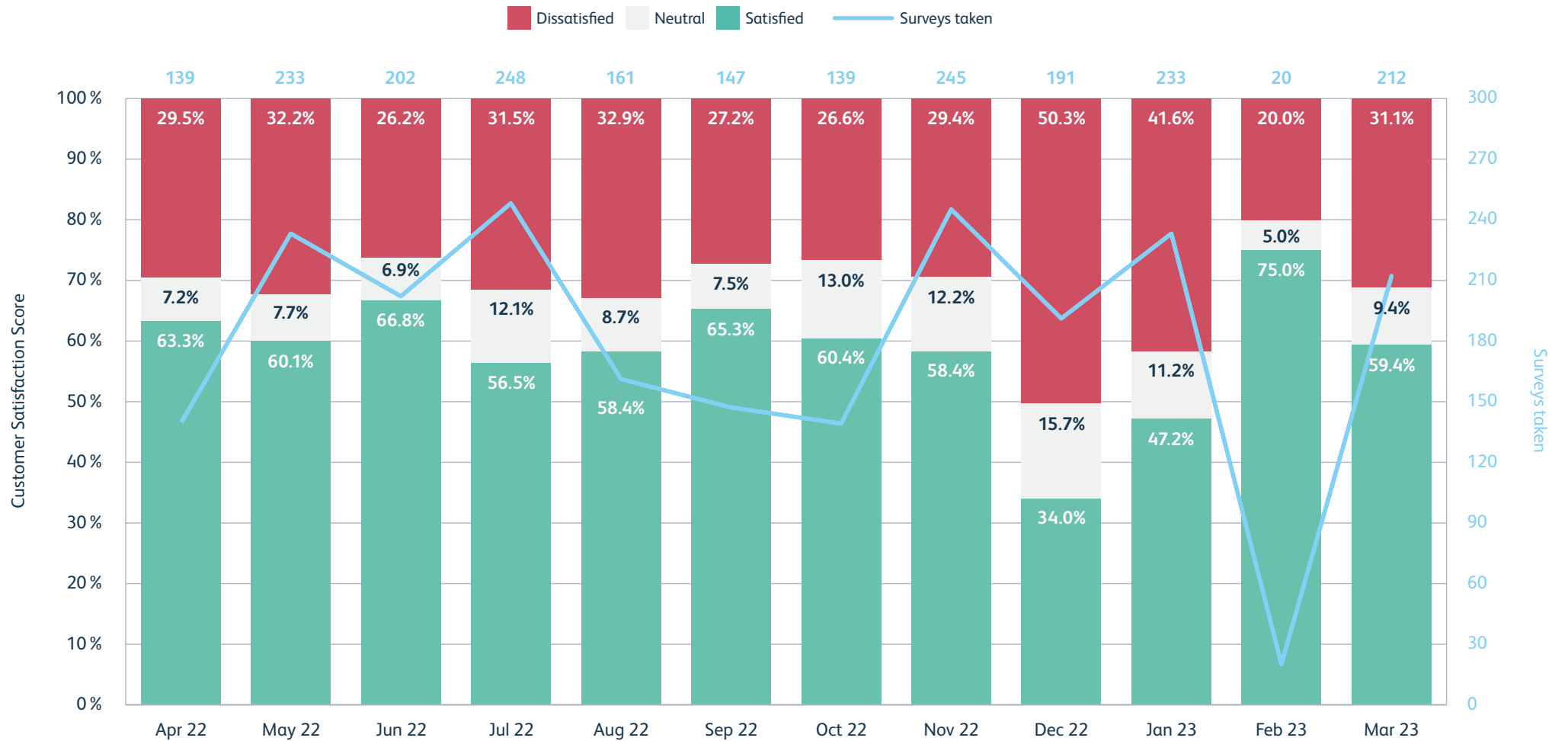


CUSTOMER SATISFACTION SCORES

Please note:

Surveys were paused in February and reinstated in March, following a review of the process. Some surveys were being issued before payment had been made to the member – the timing of the survey has now been updated to correct this.

RETIREMENTS ALL LPPA



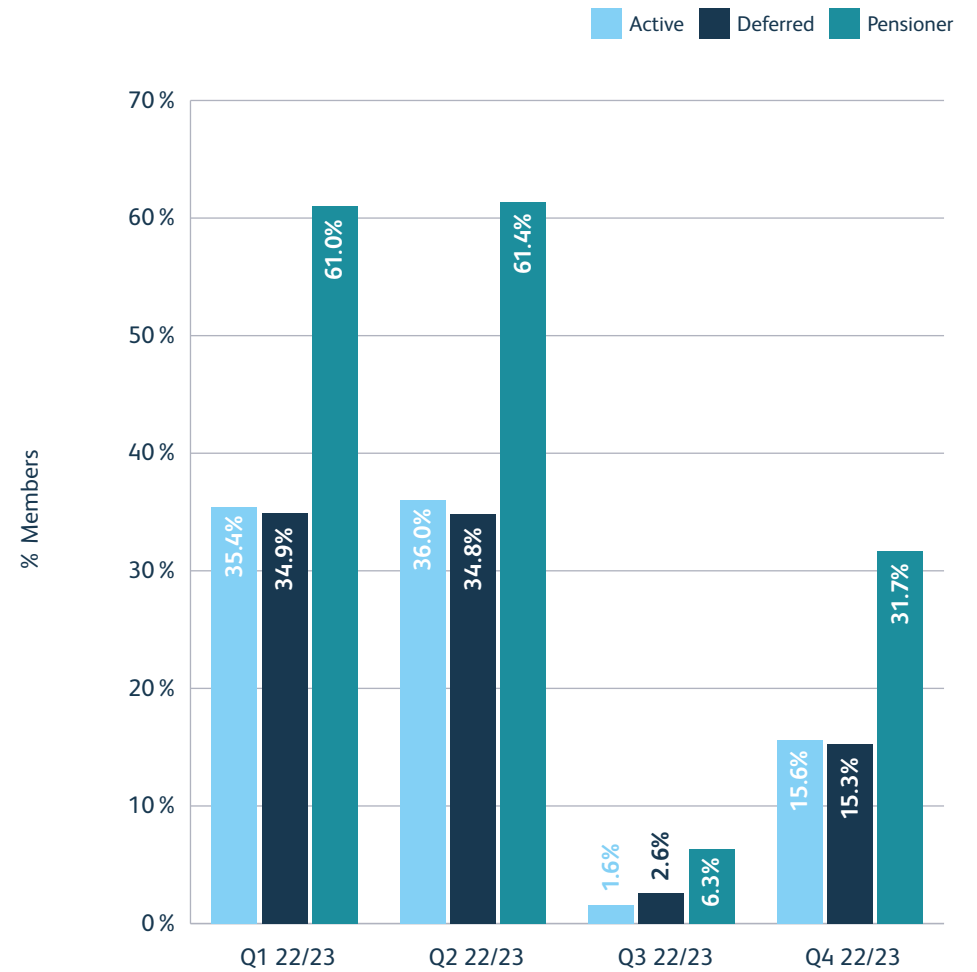
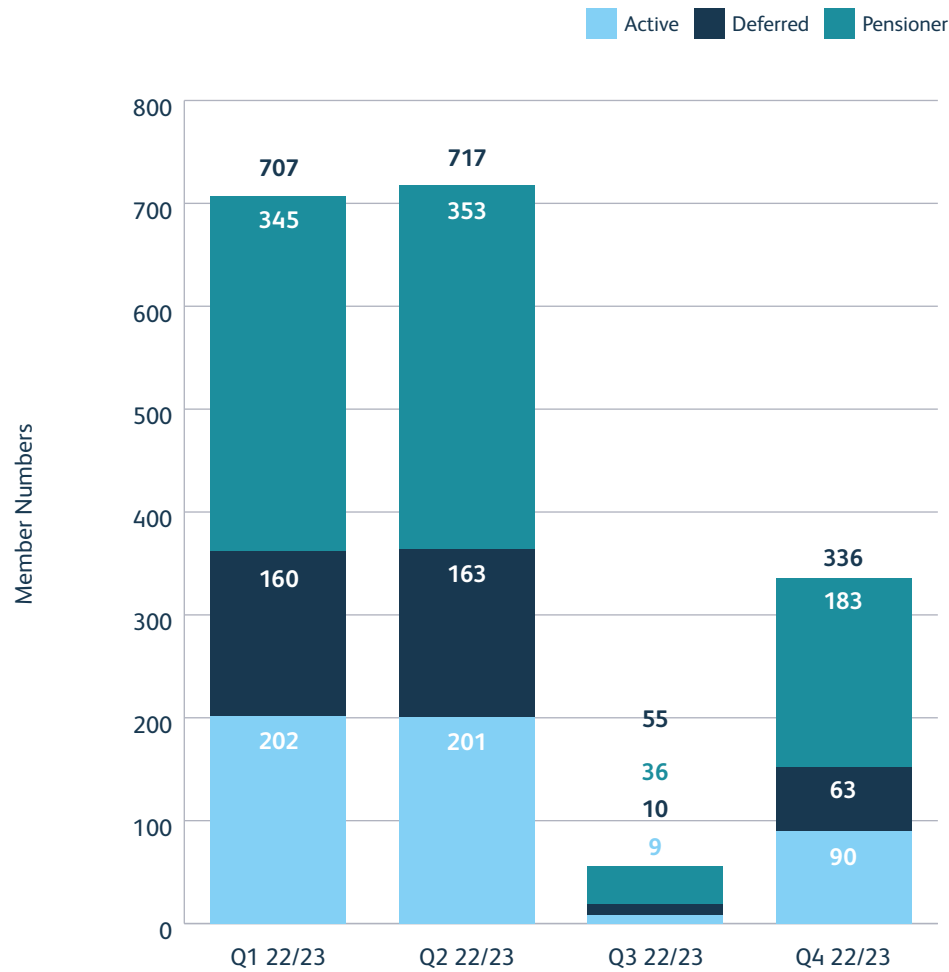


Member Online Portal

In this section...

- Members registered

MEMBERS REGISTERED CLIENT SPECIFIC



Employer Engagement & Communication Activity

In this section...

- Delivered
- Scheduled
- Engagement communications

For annual data,
please see the
**Annual Appendix –
pages 7-18**

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



DELIVERED

ALL LPPA

1. A [member panel email](#) was issued, asking for feedback on the new LPPA Help Hub, which was launched in December on the LPPA website.
2. Emails, to a cross-section of members from all clients, inviting them to [join the member panel](#) were sent out in January.
3. A pension increases web page was created to update members on the latest pension increases.
4. Further website developments (additional pages) went live in Q4 including:
 - [New Joiners](#)
 - [Member contribution rates \(23/24\)](#)
 - [Additional Pension Contributions \(APC\)](#)
 - [Pension pay dates \(23/24\)](#)
 - [Updating Your Bank Details](#)
 - [Retirement Guide for Leavers](#) (updated)
 - [Tier 3 Ill Health Retirement](#) (updated)
5. In preparation for McCloud remedy, [further communications](#) were issued to fund employers to ensure that historic data submissions have been accurately supplied (specifically hours worked and service break data).
6. A [McCloud roadmap webpage](#) was also created for our clients.
7. [Several bite-sized video FAQs](#) were developed to help answer some of the more popular member questions, including opting out, and information on the 50:50 option.
8. New Frequently Asked Questions (FAQs) were added to the LPPA website, following the Spring Budget, [including updates on Lifetime Allowance \(LTA\) and annual allowance](#). A news story was also added to the [website](#).
9. The automated Helpdesk (recorded) message was updated to include details of how to access P60 documents for retired members (from April).
10. [A joint press release was issued with Civica](#), following the completed switch to the UPM administration platform.
11. LinkedIn posts were issued in Q1 covering a wide range of topics including:
 - Pension health checks
 - LPPA's Cyber Essentials Plus certification
 - Pension increases
 - Safer internet day
 - PensionPoint ('register to enjoy the benefits')
 - Employer Monthly Return training
 - LGBT history month
 - Chinese New Year
 - '100,000' members registered on PensionPoint
 - International Women's Day
 - LPPA Client forum
 - Spring Budget (2023)
 - Monthly Returns

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



DELIVERED CONTINUED

ALL LPPA

- Happy Easter
 - Happy Ramadan
12. [Pension Pulse bulletin](#) – a UPM special was issued to employers in January, followed by a '[financial year end](#)' special in March.
13. Employer training sessions were delivered with a focus on monthly returns and navigating the UPM employer portal, including:
- UPM employer portal training (sessions to support with general navigation and submitting the monthly return data file)
 - Monthly Return Training – regular training sessions available for employers to attend, with a demonstration of the upload of Monthly Return file via UPM employer portal.
 - Remote employer visits conducted to support with navigating the UPM employer portal.
 - Employer visits (training sessions and support meetings) continue to be delivered remotely.
14. Member Sessions were delivered, all bookable via the LPPA Member Training page, including:
- Making Sense of your Pension (online sessions are aimed at members to help improve their knowledge of their pension, whether they have recently joined the scheme, or have been in the scheme a while).
 - Making Sense of Retirement (sessions are aimed at Members who are reaching retirement age (age 55 and over) to help improve their knowledge of the retirement process and claim their pension).

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



SCHEDULED

ALL LPPA

1. All employers will be required to provide monthly data submissions to LPPA from the 10 May 23 (previously only employers of specific funds supplied monthly data files), and training will continue to be delivered by the engagement team in support of this.
2. P60's will be uploaded to members online accounts (PensionPoint) before the end of May, and email notifications will be issued across the period April to May (paper copies will be mailed to members who have requested them).
3. The LPPA online Spring Newsletter for retired members will be issued around the same time as P60's.
4. ABS notification activity will be planned in Q1, with communications scheduled for delivery in line with statutory deadlines (by the end August).
5. The LPPA online Summer Newsletter for Active and Deferred retired members will be issued around the same time as ABS communications.

EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY

For annual data, please see the **Annual Appendix – page 17 & 18**

EMAILS – EMPLOYERS

CLIENT SPECIFIC

January

- Pension Pulse (UPM Special)
- Monthly data returns training

March

- Pension Pulse

EMAILS – MEMBERS

CLIENT SPECIFIC

January

- Member training - Making Sense of Your Pension / Retirement

February

- Member panel / News Hub (small selection across multiple funds)

March

- Member panel / invitation (small selection across multiple funds)

Data Quality

In this section...

- Common data
- Conditional data

DATA QUALITY (TPR SCORES)

COMMON DATA

CLIENT SPECIFIC

Data Item	Active	Deferred	Pensioner / Dependant
Invalid or Temporary NI Number	0	0	1
Duplicate effective date in status history	0	0	0
Gender is not Male or Female	1	0	0
Duplicate entries in status history	0	1	1
Missing (or known false) Date of Birth	0	0	0
Date Joined Scheme greater than first status entry	0	0	0
Missing Surname	0	0	0
Incorrect Gender for members title	0	0	0
Invalid Date of Birth	0	0	0
No entry in the status history	0	0	0
Last entry in status history does not match current status	0	0	0
Member has no address	2	16	2
Missing Forename(s)	0	0	0
Missing State Retirement Date	0	0	0
Missing postcode	2	16	3
Missing Date Joined Pensionable Service	0	0	0
Total Fails	5	33	7
Individual Fails	3	17	5
Total Members	576	411	577
Accuracy Rate	99.5%	95.9%	99.1%
Total accuracy rate	98.4%		

CONDITIONAL DATA

CLIENT SPECIFIC

Data Item	Fails
Divorce Records	0
Transfer In	6
AVC's/Additional Contributions	1
Deferred Benefits	0
Tranches (DB)	0
Gross Pension (Pensioners)	1
Tranches (Pensioners)	0
Gross Pension (Dependants)	1
Tranches (Dependants)	0
Date of Leaving	0
Date Joined Scheme	0
Employer Details	0
Salary	3
Crystallisation	16
Annual Allowance	2
LTA Factors	4
Date Contracted Out	2
Pre-88 GMP	33
Post-88 GMP	17
Total Fails	86
Individual Fails	85
Total Members	1,564
Accuracy Rate	94.6%

LPP

Local Pensions Partnership
Administration

Administration, Management and Governance Strategy

Fire Pension Scheme(s)

Version Control	Changes Made	Author
Version 1 July 2023	Creation of CFRS FPS Administration, Management and Governance Strategy	FPS Scheme Manager Head of People and Talent

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1. Background

In 2018, Aon were commissioned by the Firefighters' Pensions (England) Scheme Advisory Board (SAB) to undertake a benchmarking review of the administration and management of the Firefighters' Pension Scheme (FPS).

One of the recommendations made within the report was the implementation of a locally developed pension administration strategy to formalise standards and expectations of the Fire and Rescue Authority (FRA) and their administrator:

"We suggest that the Board considers recommending regulatory changes to encourage best practice among all scheme managers/FRAs and administrators across the Scheme. This could be achieved by setting out requirements for each Scheme Manager to have a locally developed pensions administration strategy in place. This could be mandated but as a minimum it could set out the need to have one to demonstrate best practice (as is the case in other schemes such as the LGPS). An administration strategy should set out the scheme manager's aims and objectives and how those are going to be achieved in conjunction with the administrator. Performance against those aims, and objectives, must then be appropriately measured and monitored and where administration levels are not to the required standard, plans should be in place to address those areas of concern. An administration strategy should be determined locally (with support in doing so made available from centrally prepared guidance).

A range of target timescales should be determined by each FRA and it is good practice for them to be included in an administration strategy. Scheme managers may wish to set shorter timescales or other targets for specific processes rather than relying on legal timescales in all cases. The administration strategy should be publicly available for all stakeholders (including members). It could also set out the consequences of what not achieving those targets would be."

While there is no legislative requirement for FRAs to have such a strategy in place, the SAB secretariat have provided a template for authorities to adopt to demonstrate best practice in the administration and management of the FPS. With each of the 44 FRAs in England responsible for managing the scheme and making decisions in their own right, this document also seeks to ensure a level of consistency in the service offered to scheme members, with FRAs working in conjunction with their administrator. There are currently 16 different administrators providing administration services across the 44 FRAs.

As the FRA as scheme manager has responsibility for both administering and managing the scheme, it was determined by the SAB Administration and Benchmarking committee ("the Committee") that the scope of the document be extended to include each of these roles, and that the expectations of Local Pension Boards in their role of assisting the scheme manager should also be included.

2. Introduction

The Cumbria Commissioner Fire and Rescue Authority is defined in law as the scheme manager and is therefore responsible for the management and administration of the Firefighters' Pensions Schemes for scheme members employed by Cumbria Fire and Rescue Service.

Although the scheme manager function is delegated to the Chief Fire Officer, Cumbria Commissioner Fire and Rescue Authority (CCFRA) retains legal responsibility for the scheme.

In the employer role, Cumbria Commissioner Fire and Rescue Authority will provide pension related functions such as HR, finance, and payroll.

Administration of the scheme has been outsourced to Local Pension Partnership Administration (LPPA) through a delegation agreement with Lancashire County Council.

This document is the FPS Administration, Management, and Governance Strategy statement which outlines formal standards and expectations of the Cumbria Fire and Rescue Authority (FRA) and their administrator, along with expectations of the Local Pension Board (LPB) in their role of assisting the scheme manager.

A governance policy statement is attached as Appendix 1.

The aim of the document is to ensure that a consistent, cost-effective, and high-quality pension service is provided to members, recognising that full and transparent collaboration between stakeholders is key to achieving this aim.

3. Purpose and Compliance

The purpose of this document is to facilitate best practice and efficient customer service in respect of:

- Procedures for liaison and communication with the Administrator LPPA;
- The establishment of performance levels which the Administrator LPPA and CCFRA are expected to achieve;
- Procedures to ensure compliance with statutory requirements in connection with the administration of the FPS;
- Procedures for improving the methods of passing information between the administering authority and CCFRA.;

The following stakeholders have been consulted in the development of this statement: Cumbria Commissioner Fire and Rescue Authority and Deputy Commissioner, Local Pension Board; Administrator LPPA; Trade unions, colleagues from Legal, Payroll, HR Systems and CCFRA HR Team.

The scheme manager is the owner of the document. A copy can be found at [[INSERT WEB ADDRESS](#)].

This strategy does not override any provision contained with the scheme regulations or any administration guidance provided by the Local Government Association (LGA).

The document has been presented, considered, and ratified by the Local Pension Board on **20 July 2023** and applies to all interested parties from this date.

4. Compliance and Review

The strategy will be reviewed following any changes to scheme rules, processes, or procedures which affect this strategy, including a change of administrator, or every three years if this is sooner.

Changes will be made following consultation with the above-named bodies and a copy of the updated strategy will be made available online. Full consultation will not take place when there has been a change of contacts details only in 5.1 or 5.2 below.

Suggestions for improvement to this strategy are welcome from stakeholders at any time.

5. Liaison and Communication

5.1 Cumbria Commissioner Fire and Rescue Authority contacts

The scheme manager has nominated contacts in the following areas to allow correspondence to be directed to the most relevant individual. These contacts will be provided to the administrator and the LGA.

<p>Scheme manager (strategic) contact for scheme consultations, surveys, discretions, and Internal Dispute Resolution Procedure (IDRP)</p> <p>CFO Kristine Ward, Head of People and Talent Sandra Sedgwick, Senior HR Advisor (Pensions)</p>
<p>Pension liaison contact for day to day administrative duties such as completion of forms, responding to queries, and HR functions</p> <p>Kristine Ward, Head of People and Talent Sandra Sedgwick, Senior HR Advisor (Pensions) Sheena Benson, Senior HR Advisor</p>
<p>Payroll contact for queries relating to pay, contributions, submission of monthly/ annual returns, year-end postings, leaver forms</p> <p>Mandy Roach, Payroll Manager</p>
<p>Finance contact for valuations, SAB levy payment requests, Pension forecasts for the Top up Grant, Event Reporting and Accounting for Tax</p> <p>Steven Tickner, Chief Finance Officer (S.151) Mike Scott, Service Accountant Fiona Parker, Group Accountant (Westmorland and Furness Council) Phil Whyte, Principal Finance Officer (Westmorland and Furness Council)</p>
<p>Systems for monthly returns, data checking etc.</p> <p>Mary-Lou Miller, HR Systems</p>
<p>Legal</p> <p>Adrian Maitre, Lead Lawyer</p>

The scheme manager is responsible for keeping the nominated contacts up to date and providing prompt notification of changes.

5.2 Administrator contacts

The Administrator will provide the following contact information for CUMBRIA FRS and the

scheme members:

Pension Fund representative for regulatory or administration queries, training, advice and guidance LPPAclients@localpensionspartnership.org.uk
Finance contact to assist with the monthly returns process/ year end/pension payroll Engagement@localpensionspartnership.org.uk
Systems contact to assist with the monthly returns process/ year end Engagement@localpensionspartnership.org.uk
Member helpline for queries
LPPA Helpdesk telephone no.0300 323 0260 (<i>Monday-Thursday 9am-5pm, Friday 9am-4pm</i>).

5.3 Communications Activity

	Activity	Main contact
5.3.1	Ensure that members, representative of members and prospective members are provided with FBS scheme specific information online https://www.lppapensions.co.uk/members/schemes/firefighters-scheme/ . Member videos such as about what to consider when retiring to be provided via the LPPA Pensions website.	LPPA
5.3.2	Provide a Helpdesk and online member contact form for enquiries for both members and CCFRA. The Helpdesk contact phone number is 0300 323 0260	LPPA
5.3.3	Develop and actively promote the use of electronic/online facilities for data sharing and communication purposes between CCFRA and LPPA.	LPPA
5.3.4	Develop and actively promote the use of member and employer online self-service systems and provide day to day access and query support.	LPPA
5.3.5	Provide Scheme information, including: <ul style="list-style-type: none"> • New starter information and documentation; • Scheme guides and fact sheets for both members and employers; • Annual newsletters; and • Employer bulletins (as and when appropriate). 	LPPA
5.3.6	Provide employer information and training (as appropriate), for example: <ul style="list-style-type: none"> • Virtual employer training • Employer Information online 	LPPA

	Activity	Main contact
	Including: <ul style="list-style-type: none"> • Pension basics and general employer administration functions; • Changes to the regulations; • New technological developments; and • Navigation of systems. 	
5.3.7	At the request of CCFRA provide appropriate attendance at courses/seminars (e.g. pre-retirement or induction courses),	LPPA
5.3.8	In conjunction with the CCFRA pensions' team, arrange and facilitate one-off 'Road Shows' where there are material and/or extensive regulatory changes in respect of the Scheme.	LPPA & CCFRA
5.3.9	Undertake appropriate consultation with CCFRA as required.	LPPA

6. Scheme Manager Duties and Responsibilities

6.1 Discretions

As a matter of best practice, **the scheme manager has prepared and published written statements on the exercise of discretions** which are available to them under each set of FPS regulations. The discretions policy will be kept under review and the revised version published within one month of the effective date.

A full list of scheme manager discretions is available on the CFRS website.

6.2 Internal Dispute Resolution Procedure (IDRP)

If a scheme member, prospective member, dependant, or other person with an interest in the scheme, is dissatisfied with a decision made by the CCFRA (or the failure to make a decision) there are rights of appeal available. Each set of scheme rules contains arrangements for Internal Dispute Resolution Procedures (IDRP) based on the requirements of the Pensions Act 1995 and the Occupational Pension Schemes (Internal Dispute Resolution Procedures Consequential and Miscellaneous Amendments) Regulations 2008.

Firefighters' Pension Scheme 1992 (FPS 1992)	Rule H3 (as amended by SI 2013/1392)
Firefighters' Pension Scheme 2006 (FPS 2006)	Part 8, paragraph 5
Firefighters' Pension Scheme 2015 (FPS 2015)	Regulation 163
Firefighters' Compensation Scheme (FCS)	Part 6 rule 3

The scheme manager has nominated appropriate persons to hear each stage of the appeal and respond to the individual within the specified timescales.

The timescales for each stage are stipulated in the IDRP and must be adhered to in order to mitigate further complaint or distress to the member. Failure to comply with timescales could

be construed as maladministration and attract a financial award from The Pensions Ombudsman (TPO).

The nominated decision makers for CCFRA are:

Stage 1	Chief Fire Officer (as delegated Scheme Manager)
Stage 2	Panel – Deputy CFO, and a Finance / HR and Legal representative.

CCFRA's IDRPs can be found on the CFRS website.

6.3 The Pensions Regulator (TPR)

TPR is a public body established by the Pensions Act 2004 to make sure that pension schemes within the UK are run properly and can provide secure benefits for their members upon retirement. TPR has powers to "educate, enable, and enforce", and is responsible for promoting good scheme administration. The Regulator is sponsored by the Department for Work and Pensions (DWP).

TPR's oversight of public service pension schemes, including the Firefighters' Pension Schemes, was introduced by schedule 4 of the Public Service Pensions Act 2013.

The scheme manager will ensure that they are familiar with TPR's Code of Practice: Governance and administration of public service pension schemes.

Each year TPR issue two requests for information which the scheme manager and Local Pension Board (LPB) shall ensure are completed:

The **scheme return** is a statutory return which allows TPR to keep their register of workplace pension schemes up to date.

The return asks for information about what type of scheme Cumbria FPS is and how many members it has, as well as requesting up to date contact details.

The return also asks schemes to provide their common and scheme specific data scores, which enables TPR to monitor continuous data improvement.

TPR can and will take enforcement action if the scheme return is not completed.

Governance and Administration Survey – the scheme manager will complete the annual governance and administration survey in conjunction with the LPB. Although the survey is not mandatory, participation is strongly encouraged by both TPR and the Scheme Advisory Board, so that improvements in running the FPS can be monitored and evidenced.

TPR do not take any regulatory action based on survey responses, but overall trends may inform their engagement activity with schemes. Non-completion of either of the above requests for information may indicate wider governance failings to TPR.

TPR's 'six key processes' assist schemes with understanding and compliance.

One of TPR's key areas of focus is record keeping and data quality. The **scheme manager shall ensure that data is reviewed annually and that a data improvement plan is in place.**

6.4 Data transfer

The scheme manager will ensure that processes are in place for timely and accurate transfer of data.

Data will be transferred to LPPA (the Administrator) electronically on a monthly and annual basis in line with the deadlines set out in the Service Standards.

Data validation and cleansing processes should be in place in accordance with TPR requirements.

6.5 Contribution bands

Banded contribution rates apply to the FPS based on a member’s pensionable pay. **The scheme manager will ensure that there are processes in place to allocate members to the correct contribution band at the start of each scheme year.**

Contributions are laid in legislation for each scheme and can be found on the annual updates page of the Regulations and Guidance website.

6.6 Reporting breaches

Scheme managers and pension board members have a statutory obligation to record and report breaches of the law.

When a potential breach has been identified, the breach assessment will be completed to assess the breach for materiality in order to determine whether it needs to be reported to TPR. This can also be stored as documentary evidence if the decision is later challenged.

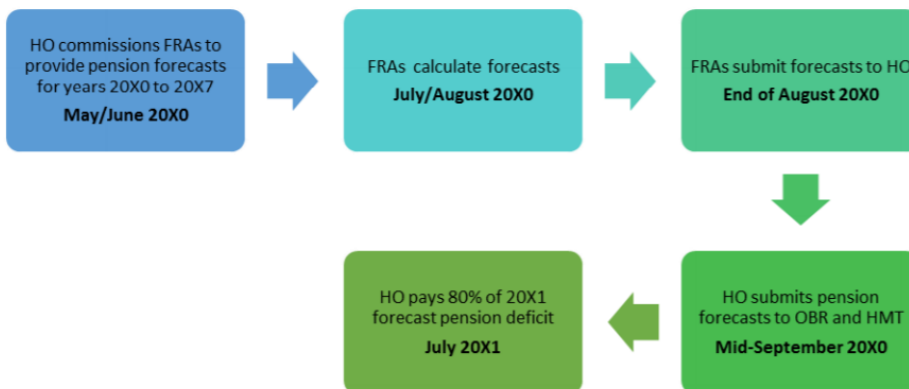
Although a breach may not seem material in terms of numbers of members affected, if the same members are consistently affected, this will be considered, along with likely timescales for rectification and what action may be taken to ensure that the breach does not reoccur.

CCFRA will use the TPR’s Assessment tool for determining whether a breach has occurred and if it should be reported.

The TPR is consulting on a new code of practice to replace the existing codes.

6.7 Top-up grant

Each year the Home Office commissions FRAs to submit pension forecasts for the following seven financial years in line with the following timescales.



The pension forecasts for the financial year following the collection are used to make an initial assessment on each fire authority's annual top up grant entitlement for that year.

The collection of accurate annual pension forecast data is critical for ensuring sufficient budget cover is secured to make pension top up grant payments to FRAs each year.

The scheme manager is responsible for ensuring this information is submitted accurately and on time.

6.8 HMRC reporting

HMRC reporting will be the responsibility of CCFRA. LPPA (the Administrator) will provide accurate and timely data to enable the submission of reports.

Event Reporting – the scheme administrator of a registered pension scheme must tell HMRC when certain reportable events occur no later than 31 January following the end of the tax year. This is done by submitting the Event Report for a tax year.

These reportable events are split into two categories:

- reportable changes, and
- reportable fund movements.

There are 23 reportable events.

Full details on Event Reporting can be found in HMRC Pensions Tax Manual.

Accounting for tax (AFT) – the scheme administrator is liable for payment of certain tax charges in connection with the scheme. When a scheme administrator does have a tax liability, the return that the scheme administrator must complete to account for that liability is called the Accounting for Tax return.

The scheme administrator is responsible for making the AFT return and for ensuring it is correct and complete.

Please note this is not a reference to the pension administration provider. Scheme administrator in this context refers to the duties of the FRA as stated in paragraph 3, sub paragraph 2 of 2006/569 which confirms that references to 'scheme administrator' as set out in schedule 3 should be read as a reference to the sub scheme administrator as per schedule 2, in which the FRAs are listed.

A third-party administration provider can file the AFT on behalf of the scheme administrator, but the scheme administrator remains responsible for ensuring that it is submitted on time and the contents are correct. Where a provider submits the AFT the scheme administrator should have seen and approved its content before it is submitted to HMRC. The provider must make a declaration that the scheme administrator has approved the contents before they can submit it to HMRC.

6.9 General Data Protection Regulation (GDPR)

Each FRA is a Data Controller for pension scheme data under GDPR and must

determine how, and for what purposes, data is to be processed.

CCFRA is a Data Controller as part of the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR). This means that CCFRA store, hold and manage personal data in line with statutory requirements to enable the provision of pension administration services. To enable CCFRA to carry out their statutory duty, they are required to share information with certain bodies, but will only do so in limited circumstances. More information about how CCFRA hold data and who it is shared with can be found in the CCFRA's Privacy Notice on the CFRS website.

6.10 Disclosure

Under the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations, **the scheme manager must provide certain information to scheme members within certain timescales.**

6.11 Overriding legislation

In addition to the scheme regulations, **the scheme manager will ensure compliance with any overriding legislation in force.**

6.12 Audit

CCFRA may commission internal and external audits in maintaining the FPS pension fund account and other pension related matters.

CCFRA will fully comply with any requests for information from both internal and approved external auditors, including from the administrator's auditors.

7. Administrator Duties and Responsibilities

7.1 The Pensions Regulator (TPR)

LPPA (the Administrator) will ensure that they are familiar with TPR's Code of Practice: Governance and administration of public service pension schemes, or any subsequent amendments / updates / new codes of practice (currently being developed).

7.2 Data standards

LPPA (the Administrator) **will ensure that suitable and secure methods of data transfer are available for CCFRA to use.**

Personal data will only be transferred from one party to the other via an acceptable method specified by the administrator which may include any of the following:

- a. Data transfer service (Internet based application)
- b. Secure email
- c. Paper forms signed by an authorised officer from the employer
- d. Password protected excel spreadsheet

Data validation and cleansing processes should be in place in accordance with TPR requirements.

7.3 Reporting breaches

LPPA (the Administrator) **also has a statutory obligation to record and report any identified breaches of the law.**

Please see section 6.6 for further details.

As noted above the TPR is consulting on a new code of practice to replace the existing codes.

7.4 HMRC reporting

The scheme manager retains legal responsibility for **HMRC reporting.**

See section 6.8 for more information.

7.5 GDPR

LPPA (the Administrator) holds personal data on behalf of the CCFRA, including all membership records and bank details of FPS pensioner members.

LPPA (the Administrator) **is therefore a Data Processor for pension scheme data under GDPR and must determine how, and for what purposes, data is to be processed.**

7.6 Overriding legislation

In addition to the scheme regulations, LPPA (the Administrator) **will comply with any overriding legislation in force.**

7.7 Audit

LPPA (the Administrator) is subject to an annual audit of its processes and internal controls. **LPPA's internal audit will provide assurance to the Local Pension Board by auditing the pension administration service provided to the CCFRA** and a summary of the audit should be provided to CCFRA.

Any subsequent recommendations will be considered and where appropriate implemented (following any necessary discussions with CCFRA).

CCFRA and LPPA (the Administrator) will consult with external auditors to seek acceptance of these proposals.

CCFRA may commission internal and external audits and the internal and/or external auditors may require access to the data held by LPPA (the Administrator) and explanations of the administrator's internal controls upon which CCFRA / the scheme manager relies.

Therefore, LPPA (the Administrator) **also has an obligation to comply with any requests from the CCFRA / the scheme manager's auditors.**

7.8 Benchmarking

LPPA (the Administrator) **will periodically monitor its costs and service performance** against the initial Aon report and any other benchmarking tool which may become available, to ensure that CCFRA continue to receive value for money.

Results should be made available to CCFRA.

8. Performance Reporting

Ensuring compliance is the responsibility of both the administrator and CCFRA. They will work closely together to ensure compliance with all statutory requirements, whether they are specifically referenced in the regulations, in overriding legislation, or in this administration strategy.

Both employer and administrator targets will be measured on a quarterly basis against specific tasks set out in the agreement and these will be reported to CCFRA. CCFRA will provide the information to their Local Pension Board.

LPPA (the Administrator) will ensure that they are appropriately resourced to meet the agreements in place.

Minimum standards for completing tasks in line with industry good practice and regulations, where applicable, are included in the 'Performance Levels' of the agreement for the delegation of CCFRA's FPS administration functions to Lancashire County Council. These are provided as a guide to the minimum requirements. As a matter of best practice, LPPA (the Administrator) may want to implement shorter local timescales.

A key factor in calculating the time taken to complete a process is the point at which the 'time clock' is started. This may be from the date of the relevant event or when LPPA (the Administrator) is informed or receives all necessary information. The clock may also need to be 'paused' during the process, for example to await instruction or documentation from the member or employer, and these waiting days can reasonably be excluded from the total time taken.

Pension administration software typically contains task-management/ work-flow modules which allow timescales to be built in.

9. Improving performance

Where areas of poor performance on either side are identified, LPPA (the Administrator) will work closely with CCFRA to provide the opportunity for necessary training and development.

Appropriate processes will be put in place to improve the level of service delivery. [An example escalation procedure is shown below, this is intended to apply in case of performance issues identified on either side.]

- Initially LPPA will liaise with CCFRA setting out the area(s) of poor performance and how they can be addressed.
- Where no improvement is demonstrated or there has been a failure to take agreed action, LPPA will write to the scheme manager setting out the area(s) of poor performance that has been identified and the steps taken to resolve those area(s).
- If lack of improvement continues or there has been ongoing failure to take agreed action, LPPA will write to the Local Pension Board setting out the area(s) of poor performance that has been identified and the steps taken to resolve those area(s).

LPPA (the Administrator) rely on timely and accurate data from CCFRA. Where persistent and ongoing failure occurs and no improvement is demonstrated, LPPA will escalate this to the scheme manager and Local Pension Board as above.

Where an employer fails to operate in accordance with the standards described in this strategy, which leads to extra costs being incurred by LPPA (the Administrator), LPPA may issue a written notice requiring that these be met by the employer.

Any third-party costs or regulatory fines incurred by LPPA (the Administrator) solely as a result of poor performance by the employer may also be recovered. Such costs may include fines imposed by the Pensions Ombudsman or Pensions Regulator, and additional charges in respect of actuarial or software fees, and additional printing and distribution costs.

Both parties should consider the risk of reputational damage that may arise where a Pensions Ombudsman finding is published in the public domain and/or any fines are publicised.

These recommendations do not override the legal position and relationship between LPPA and CCFRA.

10. Service Standards

The service standards are set out in the Deed of Agreement for the delegation of Cumbria Commissioner Fire and Rescue Authority's Firefighters' Pension Scheme pension administration functions to Lancashire County Council. This includes:

- Functions
- Services and Service Levels
- Service Standards Contributors
- Performance Levels and Targets

Administration of the scheme has been outsourced to Local Pension Partnership Administration (LPPA) through the delegation agreement with Lancashire County Council.

11. Local Pension Board Responsibilities

Local Pension Boards were required to be established by 1 April 2015 under the provisions of Section 5 of the Public Service Pensions Act 2013 and regulation 4A of The Firefighters' Pension Scheme (Amendment) (Governance) Regulations 2015.

The regulations state that each FRA must have an equal number of employer and member representatives, with a minimum of four members in total. Members are expected to have a sufficient degree of knowledge and understanding of the pension scheme to allow them to fulfil their role, which is to assist the Scheme Manager in complying with the pension scheme rules.

The membership of the CCFRA Local Pensions Board will include:

2 Employer Representatives

2 Scheme (member) Representatives

The CCFRA LPB will meet a minimum twice per year or quarterly where possible with advice

being provided by the CFO, and Officers representing Finance, HR and Legal.

The Terms of Reference are attached as Appendix 2.

12. Training

An annual assessment of Training requirements is undertaken for members of the Fire LPB to ensure that collectively they have the required knowledge and skills to make appropriate decisions and offer challenge, and for Officers to ensure they are adequately trained and experienced to undertake the day-to-day operation and management of the fund.

The Training Policy is formally reviewed by the Fire LPB annually and a Training Plan developed each year.

There are various resources available for the delivery of the training as outlined in the Training Policy and Plan. These include:

- The Local Government Association (LGA) Bluelight pensions team who can provide annual training for boards at a local or regional level.
- The Pension Regulator (TPR) courses on the Public Service Toolkit, to help those involved in scheme governance to improve their knowledge.
- The Firefighter's Pensions (England) Scheme Advisory Board (SAB) website which holds a range of resources that have been developed to facilitate the effective running of Local Pension Boards.

13. Internal Controls and Risk Management

Risks are identified in the Risk Register which is monitored and reviewed at least quarterly by the LPB. Each risk sets out the internal controls to mitigate the main risks and how to monitor them.

It is the responsibility of the Scheme Manager, Officers of CCFRA and LPPA to take account of a changing environment to identify new and emerging risks. Risks will then be analysed and control measures or mitigations will be put in place.

Appendix 1 - Governance Policy Statement

Cumbria Fire and Rescue Authority Fire Pensions governance policy statement

The Public Service Pensions Act 2013 set out governance arrangements for all public service schemes with effect from 1 April 2015, including the requirement for each public service scheme to have a **Scheme Manager** and a **Fire Local Pension Board** in place.

Scheme manager

The term scheme manager is defined in law as the person responsible for **managing and administering** a pension scheme. The Firefighters' Pension Scheme (FPS) Governance Regulations provide that for the FPS, the scheme manager is the Fire and Rescue Authority.

Therefore, for the FPS in Cumbria, the Cumbria Commissioner Fire and Rescue Authority is the scheme manager. The scheme manager function may be delegated within the authority.

Cumbria Fire and Rescue Authority has delegated the function to the Chief Fire Officer.

Local Pension Board

The FPS Local Pension Board ("the Board") was established from 2015 under the provisions of Section 5 of the Public Service Pensions Act 2013 and regulation 4A of The Firefighters' Pension Scheme (Amendment) (Governance) Regulations 2015.

The terms, structure and operational procedures of the Board are set out in the Board's Terms of Reference. The role of the Board is to assist Cumbria Fire and Rescue Authority as scheme manager to:

- secure compliance with the FPS Regulations and any other legislation relating to the governance and administration of the Fire Pension Scheme(s), and requirements imposed in relation to the FPS by the Pensions Regulator; and
- ensure the effective and efficient governance and administration of the FPS.

The Board provides oversight of these matters and, accordingly, it is not a decision-making body in relation to the management or administration of the FPS but makes recommendations to assist in such management.

Governance objectives

- To ensure robust governance arrangements are in place to facilitate informed decision making supported by appropriate advice, policies and strategies;
- To ensure the FPS is administered and its services delivered by people who have the appropriate knowledge and expertise;
- To ensure compliance with all appropriate legislation and statutory guidance, and to act in the spirit of other relevant guidelines and best practice guidance; and

- To identify and manage potential and actual conflicts of interest.

Appendix 2 – Fire Local Pension Board - Terms of Reference

Fire Local Pension Board Terms of Reference

FLPB Terms of Reference

Version Control	Changes Made	Author
Version 1 July 2023	Terms of Reference	Head of People and Talent

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 fighters' 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 CFRS Strategic Governance Board 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 Joint Audit Committee (JAC) 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.
 - 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 Cumbria Fire and Rescue Services 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 Cumbria Fire and Rescue Service's website. On request alternative media versions are available.

6.4 The Cumbria Commissioner Fire and Rescue Authority, as the Scheme Manager (delegated to the Chief Fire Officer), is the registered data controller of the Cumbria FPS, and as such all policies and practices in this regard applicable within the Cumbria Fire and Rescue Service 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, Police Fire and Crime Commissioner and Head of People and Talent or nominated deputies.

7.3 Appointments will be for four years (or, in the case of a publicly elected role, 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 Cumbria Fire and Rescue Service’s agreed policies and rates. 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 3.1 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 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 Cumbria Fire and Rescue Service’s agreed policies and rates. All such costs will be met directly by the Cumbria Fire and Rescue Service.