



FPS Bulletin 95 – July 2025

Welcome to issue 95 of the Firefighters' Pensions Schemes bulletin.

We would encourage you to read this bulletin, taking note of and carrying out any relevant actions. This may entail escalating items, alerting colleagues where necessary, and circulating and discussing this bulletin in other forums including but not limited to others within your FRAs i.e. HR or Finance colleagues, Local Pension Boards and third-party administrators/payroll providers.



If you are looking for information on a certain topic, issue and content indexes are held on the <u>main bulletin page</u> of the website and are updated following each new issue.

If you have any comments on this bulletin, suggested items for future issues, or a job you would like to advertise, please email bluelightpensions@local.gov.uk.

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Calendar of events

Please see below a calendar of upcoming events relevant to the Firefighters' Pension Schemes. Only those events which are hyperlinked are currently available to book. If you have any events you would like to be included in a future bulletin, please email bluelightpensions@local.gov.uk.

Table 1: Calendar of events

Event	Date
FPS Coffee Morning	19 August 2025
FPS Technical Working Group	20 August 2025
	24 November 2025
SAB	11 September 2025
	11 December 2025
FPS Communications Working	15 October 2025
Group	29 January 2026
	7 April 2026
	21 July 2026
	15 October 2026

Local Pension Board training	17 September 2025 (in person) 22 January 2026 (MS Teams) Refresher Training: 18 August 2025 (MS Teams)	
LPB Chair Forum	26 August 2025 30 October 2025	
Administrator Forum	14 July 2025 11 August 2025 8 September 2025 13 October 2025 10 November 2025 8 December 2025	
LGA FRA drop-in session	23 July 2025 22 August 2025 23 September 2025 23 October 2025 21 November 2025 23 December 2025	
III Health Retirement Training	3 September 2025	
Induction Training	12 August 2025 24 October 2025	
AGM	<u>17</u> and <u>18</u> September 2025	

Actions arising

Scheme Managers

Contingent Decisions for Opted-Out Members:

- are encouraged to be involved in the working group and are asked to email bluelightpensions@local.gov.uk if they wish to be involved in the working group by Tuesday 5 August 2025.
- are asked to provide the number of CD claims that they have received for opted out members by Friday 15 August 2025.

Matthews Age Discrimination interactions: For firefighters eligible for the Matthews remedy, FRAs should implement Matthews remedy before McCloud remedy. This includes McCloud roll back and issue of RSS. If a different approach is taken McCloud remedy for affected firefighters including RSS may be incorrect. FRAs should refer to the latest GAD calculator query log when processing cases.

<u>Manual case update and new template</u>: must populate and share the new non-basic rate template when providing other case details for new 'refer to GAD' cases of this type via the secure Egress portal. Incomplete information is likely to increase the time needed by GAD to respond to these cases.

FRAs without Egress access for refer to GAD cases can get in touch to set this up at Firematthewscalculator@gad.gov.uk.

<u>Injury pensions:</u> Scheme managers and administrators should ensure any websites, guidance and processes reflect this change.

<u>2025 Training and Development</u>: are encouraged to allow their employees to attend any training that is relevant to the development of their knowledge and understanding of Firefighters' Pensions.

<u>Firefighters' Pensions Conference (AGM)</u>: are encouraged to attend and encourage their employees who are involved in Firefighters' pensions to attend Firefighters' AGM.

Administrators

<u>Contingent Decisions for Opted-Out Members:</u> are encouraged to be involved in the working group and are asked to email <u>bluelightpensions@local.gov.uk</u> if they wish to be involved in the working group by **Tuesday 5 August 2025**.

<u>Firefighters' Pensions Conference (AGM)</u>: are encouraged to attend and encourage their employees who are involved in Firefighters' pensions to attend Firefighters' AGM.

Local Pension Boards

<u>Local Pension Board (LPB) Training Sessions</u>: are encouraged to sign up to one of our training sessions, but particularly highlighting the in person session which is in

the day of the governance session of the AGM.

<u>Firefighters' Pensions Conference (AGM)</u>: are encouraged to attend and encourage their LPB members to attend Firefighters' AGM.

Age Discrimination Remedy updates

GAD and **HMRC** Offsetting guidance – walkthrough video

On 7 July 2025, we <u>emailed</u> administrators to make them aware of a walkthrough video of the GAD example 1 and HMRC's example 2, which has been published on the <u>Age Discrimination Remedy - Useful Information</u> section of the <u>FPS regulations</u> and guidance website.

Contingent Decisions for Opted-Out Members

Further to the update covered in <u>FPS Bulletin 89 - January 2025</u>, on 29 July 2025, we <u>emailed</u> all stakeholders to provide them with a further update from MHCLG relating to the current position for Contingent Decisions for opted-out members.

This update also asked for volunteers to be included in the working group being led by MHCLG over the summer. We encourage individuals to get involved in this work, and ask that you email bluelightpensions@local.gov.uk if you would like to be involved ahead of the first meeting.

In order to assist with these discussions, GAD would like to understand how many people are affected by this issue, and therefore we would ask if FRAs could let us know how many CD claims for opted out members that they have received to date by **Friday 15 August 2025**.

GAD will then follow this request up with a data specification for those cases.

ACTIONs:

Scheme managers, other FRA representatives and administrators are encouraged to be involved in the working group and are asked to email bluelightpensions@local.gov.uk if they wish to be involved in the working group by Tuesday 5 August 2025.

Scheme managers are asked to provide the number of CD claims that they have received for opted out members by **Friday 15 August 2025.**

GAD guidance

On 29 July 2025, we <u>emailed</u> administrators to confirm that the full suite of retrospective divorce guidance had been published on the <u>Divorce (pension debits</u> and credits) section of the FPS regulations and guidance website.

Matthews exercise updates

Matthews resources

Following changes made to the GAD calculator in April, it was flagged that references to row/line numbers in the example calculations at Special members of FPS 2006 - GAD Calculator no longer matched the calculator. These documents have now been updated to reflect these changes.

In addition, references to row/line numbers in the individual statement of details templates will also need to be updated. Work is ongoing on this and should be completed by 8th August.

Matthews Age discrimination interactions

The Retained firefighters' pensions: proposed changes to the Firefighters' Pension Scheme (England) Order 2006 consultation outcome recognised and highlighted the importance of the interaction of Matthews and Age discrimination remedies. "The Matthews remedy will deal with an individual's service up to and including 31 March 2015 whereas the McCloud remedy deals with service accrued between 1 April 2015 and 31 March 2022 inclusive. It is envisaged that the Matthews remedy will be implemented first by scheme administrators to ensure an individual is placed in the correct legacy firefighters' pension scheme as on 31 March 2012 which will provide them with eligibility to the McCloud remedy for any remedial service."

Several practical questions have been raised around implementation in different scenarios. Following discussion, the further clarification below is now available:

- Contributions for the period up to and including 31 March 2015 (and benefit payments in respect of service up to 31 March 2015) will be corrected as part of the Matthews remedy, and any contributions adjustments or benefit adjustments will be subject to Matthew's interest.
- Contributions for the remedy period 1 April 2015 to 31 March 2022 (and benefit payments in respect of service from 1 April 2015 to 31 March 2022) will be corrected as part of Age discrimination remedy, and any contributions adjustments or benefit adjustments will be subject to Age discrimination interest.

The Matthews 2 Calculator supports the former (service to 31 March 2015 only). The forthcoming update to the McCloud contributions calculator will extend support for the latter to include cases where the accrued service and Age discrimination legacy scheme are in different pre-2015 fire pension schemes. The <u>July 2025 GAD</u> calculator query log includes a new response to some of the queries raised.

ACTION: For firefighters eligible for the Matthews remedy, FRAs should implement Matthews remedy before McCloud remedy. This includes McCloud roll back and issue of RSS. If a different approach is taken McCloud remedy for affected

firefighters including RSS may be incorrect. FRAs should refer to the latest GAD calculator query log when processing cases.

Manual case update and new template

GAD have now shared a new Matthews 2 template for historic non-basic rate taxpayers for 'refer to GAD' cases. This template should be completed and sent to GAD when requesting a calculation for a firefighter who has evidence of paying a different marginal income tax rate than the basic rate in any of the tax-years which include any of their extended limited period or period of existing standard 2006 scheme service being converted. All amounts provided must be based on original tax documents (e.g. P60s) and FRAs must have seen original copies of those documents. Where there are gaps in evidence these should be left blank. Estimated values should not be entered into the template.

This is also to be supported by an update to the <u>manual cases note</u> which contains further important details and limitations. (This note was originally shared in July 2024 <u>FPS bulletin 83</u>.)

ACTION: Scheme managers must populate and share the new non-basic rate template when providing other case details for new 'refer to GAD' cases of this type via the secure Egress portal. Incomplete information is likely to increase the time needed by GAD to respond to these cases.

FRAs without Egress access for refer to GAD cases can get in touch to set this up at Firematthewscalculator@gad.gov.uk.

Matthews 2 Calculator demonstration

GAD will be hosting a booth at the 2025 Firefighters' Pensions annual conference. They will be demonstrating the latest version of the Matthews 2 calculator and taking questions during the event.

FPS

Firefighters' Pensions: DELTA Returns - Collection of firefighters' pension forecasts for period 2025/26 to 2030/31

On 30 July 2025, MHCLG <u>emailed</u> Claim Certifiers/Administrators to remind them that the pension forecast DELTA forms are available online and that the deadline for submission is **28 August 2025**.

Injury pensions

We have received a technical query relating to the Firefighters' Compensation Scheme which highlighted that there may be some confusion about the pay which should be used in the calculation of injury gratuities and injury pensions.

The Firefighters' Compensation Scheme and Pension Scheme (England) (Amendment) Order 2015 brought into effect changes to the Firefighters'

Compensation Scheme. These changes were needed as a result of the introduction of the 2015 scheme. The headings in the table in Schedule 1 Part 1 of the compensation scheme were amended to include 'final pay' as defined in <u>regulation</u> 93 of the 2015 scheme regulations.

Percentage disablement	Gratuity as percentage of average pensionable pay, final pensionable pay or final pay as the case may be	Pension as percentage of average pensionable pay, final pensionable pay or final pay as the case may be

ACTION: Scheme managers and administrators should ensure any websites, guidance and processes reflect this change.

Resources

Internal Dispute Resolution Procedure

Further to <u>FPS Bulletin 91 – March 2025</u> and <u>FPS Bulletin 93 – May 2025</u> we have received some queries relating to the timescales to respond to an IDRP at each stage. We have investigated this further and can confirm that whilst the Firefighters' Pension Scheme defines that the timescale for an individual to give written notice of their dispute within 28 days as follows:

"163 Appeals on other issues

Where—

- (a) a member (P) disagrees with a scheme manager's determination under regulation 151 (determinations by the scheme manager); and
- (b) the disagreement does not involve an issue of a medical nature,

P may, by written notice given to the scheme manager within 28 days of receipt of the determination, require the scheme manager to deal with the disagreement by means of the arrangements implemented by it pursuant to the requirements of section 50 of the Pensions Act 1995 (requirement for dispute resolution arrangements) and the Occupational Pension Schemes (Internal Dispute Resolution Procedures Consequential and Miscellaneous Amendments) Regulations 2008."

In their meeting of 20 June 2018, the Scheme Advisory Board, (Paper 3) Considered whether they wished to revise the guidance [FPSC 1/2009] issued in 2009 about operating a two stage IDR process. The discussion concluded that a two-stage process should remain, with an individual being able to make a written application within six months and a response to be provided within two months should remain.

The <u>IDRP guidance</u> has therefore been updated on both the FPS regulations and guidance website and the FPS member website to provide clarity over the 28 days, to reflect the Board's decision that this should be six months.

III Health guidance

We have completed our annual review of the III Health guidance and an updated version has been published on the <u>III-health and injury</u> section of the <u>FPS regulations</u> and guidance website.

The updates that have been included relate to:

- Clarification on whether an ill health retirement can be awarded if someone has been offered re-deployment.
- The pay used when assessing the degree of disablement for an injury award, as covered in Injury pension update above.

We are also pleased to publish a member guidance document on the ill health process. This has been published on the <u>Ill-health retirement</u> section of the <u>FPS</u> member website.

Firefighters' Pensions Team update

Claire returning from maternity leave

We are pleased to confirm that Claire Johnson is returning from maternity leave on Monday 4 August 2025. Tara Atkins will remain in her interim role as Senior Pensions Adviser until 31 August 2025, to allow for a smooth handover and for Claire to get back up to speed.

Programme Support Officer vacancy

We are pleased to announce that our Progamme Support Officer role has been advertised

We are offering an exciting opportunity to work as part of the pensions team at the LGA. The Fire pensions team works with and on behalf of fire and rescue services and authorities in England to support them in their role as scheme managers of the Firefighters' Pension Schemes.

The role requires an individual who can; work independently across multiple projects at any one time, update and analyse spreadsheets, produce reports, chase external stakeholders for information, plan and prepare meetings and events, take minutes, raise orders and invoices, monitor budgets, routinely keep project information and records up to date, and understand and follow corporate policies and procedures. You will also need to identify appropriate venues for conferences and training events and negotiate contracts that offer the best value for money.

The successful candidate will need to be a team player who is flexible and capable of working with minimal supervision, well organised with the ability to plan and deliver a varied workload. They will be highly capable and well-motivated, with strong communication and interpersonal skills and have excellent attention to detail.

We encourage flexible working at the LGA. This post is offered as a home or office based (Westminster) contract. The salary for a home-based worker is from £32,076.

The salary for an office-based worker includes London Weighting is from £36,158.

The job is advertised on the LGA website:

https://www.careers.local.gov.uk/job/programme-support-officer-fire-pensions-003102

The closing date is **Monday 11 August**.

If you are interested in this role or know someone that is and would like an informal discussion, please do not hesitate in contacting me tara.atkins@local.gov.uk, to find out more.

The Firefighters' Pension Scheme (Wales) (Amendment) Regulations 2025 The Welsh Government's response to the consultation on changes to employee contributions within the Firefighters' Pension Scheme in Wales has now been published.

The Firefighters' Pension Scheme (Wales) (Amendment) Regulations 2025 have also been published to legislation.gov.uk.

The employee contribution rates will come into effect from 1 September 2025.

Update your contact details

Readers will be aware that we carried out an exercise to update your contact details in FPS Bulletin 76 - December 2023.

Going forward if you need to update your contact details, please complete the contact details form and return to bluelightpensions@local.gov.uk.

General technical query log

The <u>current log of queries and responses</u> can be accessed by practitioners in the member-restricted area of the FPS Regulations and Guidance website. The queries have been anonymised and divided into topics. The log is updated monthly in line with the bulletin release dates.

Queries have been answered this month in the following categories:

Cross Border CETV

Matthews and Age discrimination remedy Query logs

We have three query logs:

- Age Discrimination remedy technical query log
- Matthews technical query log

Matthews GAD calculator query log

These logs record the technical queries we have been receiving under the age discrimination remedy, the Matthews exercise and the calculator queries that GAD have been receiving for in respect of the Matthews exercise.

The technical query logs can be accessed by practitioners in the restricted area of the FPS regulations and guidance website under the sections '<u>Age Discrimination</u> remedy technical queries and '<u>Special members of the FPS 2006 technical queries</u>'.

The Matthews GAD calculator query log can be accessed through the tab 'Calculator query log' in the Special members of <u>FPS 2006 - GAD calculator</u> section of the FPS Regulations and Guidance website.

The queries have been anonymised. The log is updated monthly in line with the bulletin release dates.

If you do not have access to the member restricted area of the FPS regulations and guidance website, you can request access by contacting the bluelightpensions@local.gov.uk inbox.

As a reminder if you have a query relating to either the <u>Age Discrimination remedy</u> or <u>Matthews</u> GAD calculators you can email GAD using their dedicated inboxes

FirePoliceMcCloudTaxInterest@gad.gov.uk

Firematthewscalculator@gad.gov.uk

Training and Development

2025 Training and Development

In <u>FPS Bulletin 88 – December 2024</u> we informed readers that we were launching a training programme for 2025. We are pleased to confirm that we have added a new <u>Training and Development</u> section to <u>FPS regulations and guidance</u> website, which provides information on what training and qualifications we are offering.

The training sessions that we have available, and the links to book are as follows:

Induction

Virtual - 12 August 2025

Virtual - 24 October 2025

III Health retirement

Virtual – <u>3 September 2025</u>

If there are any specific areas of training that you would like to see, please let us know via bluelightpensions@local.gov.uk or be part of our training working group.

ACTION:

Scheme managers are encouraged to allow their employees to attend the relevant training on offer, where it will help with their role and ongoing development.

Local Pension Board (LPB) Training Sessions

All details of the LPB training sessions are included on the <u>'Training and Development'</u> section of the <u>FPS Board</u> website. The section sets out the dates that are available and how you book for these, as this will now be completed via a booking system, which is a change to the process.

*Please note that you will need to put NA in the box where it asks for the purchase order.

The full training is aimed at newer LPB members, where they need a more detailed session on the different areas of FPS and their role. For this session we invite other stakeholders to cover certain sessions, including TPR, PDP and the Chair of the SAB.

The refresher training session is aimed at LPB members who have already received LPB training, as they have a been a LPB member for a period already and just require a bit of a refresher in their knowledge.

This training is provided by the LGA Team and will provide a reminder of the purpose of an LPB, the key role and responsibilities of all stakeholders and the current hot topics.

If you have booked onto the full training and think that the refresher training would be more suitable, please contact us and we can transfer your booking.

ACTION:

Readers are asked to make their LPB members aware of the training sessions and encourage them to book onto a session.

Events

Firefighters' Pensions Conference (AGM)

We are pleased to announce that bookings have opened for our AGM.

The two-day programme allows delegates to network with fellow colleagues and hear the latest news on the Firefighters' Pension Scheme (FPS) from the scheme's key stakeholders.

You will hear important updates, from:

- MHCLG
- The Government Actuary Department and First Actuarial
- The SAB legal advisor
- The Pension Dashboards Programme

Day one – Wednesday 17 September 2024 16:30 – 18:30

This will follow the <u>Local Pension Board training session</u> and is primarily for Scheme Managers and Local Pension Board members, day one of the conference will provide practical guidance on the role of the scheme manager and how to be an effective Local Pension Board and will offer the opportunity to network with counterparts in other FRAs.

Following this session there will be a drinks reception on the terrace from 18:45.

Day two - Thursday 18 September 10:00 - 15:30

Day two of the conference provides delegates with an annual update on the Firefighters' Pension Scheme from key stakeholders.

Bookings are open on the LGA Events page:

Day one

Day two

ACTION: Scheme managers, Local Pensions Board members, Administrators and all others involved in Firefighter's Pensions are encouraged to attend the Firefighters' AGM.

FPS coffee mornings

Our MS Teams coffee mornings are continuing in August. The informal sessions lasting up to an hour allow practitioners to catch up with colleagues and hear a brief update on FPS issues from the LGA Bluelight team.

As our session for July is being held on the afternoon of 31 July, this will be after the publication of the Bulletin, therefore this will be included within the August bulletin, but the slides will be made available on the <u>FPS coffee mornings</u> section of the FPS regulations and guidance website.

If you do not already receive the meeting invitations and would like to join us, please email bluelightpensions@local.gov.uk. Please note that attendance at the coffee mornings is generally restricted to FPS practitioners and managers

FPS England SAB updates

SAB website

You can use the links below to find out about the latest updates on the work of the SAB and its committees on the SAB website:

- SAB membership
- SAB meeting and agenda papers
- Committee meetings and agenda papers

Other News and Updates

Pension Commission revived

On 21 July 2025, the Government revived the Pensions Commission to address a growing retirement crisis.

The original Commission was established in 2002 and made several recommendations, including individuals being automatically enrolled into workplace pension schemes.

The new Commission aims to build on the work done by the original Commission. It will take a broader view – reviewing the UK pension system as a whole, along with the outcomes it delivers and the barriers stopping people from saving enough for retirement. In particular, it will consider:

- outcomes and risks for future cohorts of pensioners on current trajectories through to 2050 and beyond
- how to improve retirement outcomes, especially for those on the lowest incomes and at the greatest risk of poverty or undersaving
- the role of private pension provision and wider savings, building on the foundation of the State Pension, in delivering financial security in retirement and supporting those approaching retirement
- the long-term challenges of supporting an ageing population
- proposals for change beyond the current Parliament, that build on the measures in the Pension Schemes Bill and ensure Britain in the mid-21st Century delivers financial security in retirement through a pensions framework that is strong, fair and sustainable.

The Commission will be led by Baroness Jeannie Drake (a member of the original Commission), Sir Ian Cheshire and Professor Nick Pearce. They will work closely with stakeholders such as the Confederation of British Industry and the Trades Union Congress, drawing on the success of the original Commission in building a national consensus.

The Commission's final report is due in 2027.

For more details, see the <u>written ministerial statement</u>, <u>press release</u> and the Commission's terms of reference.

Alongside relaunching the Pensions Commission, the Government also published a <u>policy paper entitled 'Finishing the job: Launching the Pensions Commission'</u>. The paper assesses the state of Britain's pensions landscape, including the progress made in the two decades since the first Pensions Commission.

Third State Pension age (SPa) review

On 21 July 2025, the Government launched the third review of the SPa. This review will consider whether the rules around SPa remain appropriate, using the latest life expectancy data and other evidence.

Under the Pensions Act 2014, the Government must regularly review the SPa. The first review concluded in 2017, and the second in 2023.

The report for the third review must be published before 30 March 2029.

As set out in the Act, the review will consider evidence from two reports:

- an independent report, led by Dr Suzy Morrissey, on specified factors relevant to the review of SPa
- a report from Government Actuary's Department (GAD) to examine the latest life expectancy projections data.

Pension Schemes Bill - second reading

The <u>Pension Schemes Bill</u> had its second reading in the House of Commons on 7 July 2025.

To mark the occasion, the Government published a <u>press release</u> outlining how the Bill aims to transform the pensions landscape and deliver better outcomes for savers.

The Bill has now been sent to the House of Commons Public Bill Committee, which will scrutinise the Bill line by line. The Committee will first meet on 2 September 2025 and is expected to report back to the Commons by 23 October 2025. To inform its work, the Committee has launched <u>a call for evidence</u>.

Targeted support consultations

The Government and the Financial Conduct Authority (FCA) are jointly reviewing the regulatory boundary between financial advice and guidance.

As part of this work, they are proposing a new targeted support regime. This would allow authorised firms to offer more support to consumers with their pensions and investments, by making suggestions appropriate to consumers with similar circumstances and characteristics. This support would not be personalised financial advice but aims to improve outcomes by guiding people towards suitable products.

The FCA has launched a consultation on <u>draft rules for this new regime</u>. HM Treasury has also published <u>a draft statutory instrument</u> setting out proposed changes to the Financial Services and Markets Act 2000 (Regulated Activities) Order 2001 with an accompanying policy note.

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Stakeholders can respond to either consultation by 29 August 2025.

Pensions Dashboards Programme



Dashboard Programme – Publications

PDP publish regular <u>publications</u> about the Pensions Dashboards and the Programme which you can find on their <u>website</u>.

Voluntary connection

PDP has recently published its guidance on <u>voluntary connection</u> for schemes currently out of scope (i.e. with fewer than 100 relevant members). This guidance outlines how schemes, or third party providers on their behalf, can apply to connect to dashboards voluntarily. The detailed application process for voluntary connection is in development and will be updated based on consultation with industry.

Money and Pension Service (MaPS) consumer testing approach

At the recent PDP town hall event, MaPS shared it's MoneyHelper Pensions Dashboard's consumer testing approach. The approach is indicative and will evolve as they learn from consumers' experiences of seeing real pensions data on a dashboard for the first time. MaPS will work closely with industry to invite consumers to take part in testing and will keep industry updated with testing progress. Insights from testing will inform the timing of the Department for Work and Pensions's (DWP) decision to make the MoneyHelper Pensions Dashboard available to the public. DWP is committed to providing industry with six months' notice before the dashboard is made publicly available.

PDP guidance on changing route to connection

TPR have had some questions around the process to follow once a scheme is connected to the dashboard, but is changing their administrator and/or ISP. PDP has published guidance on this, which details the process to follow. If not already done so, please sign up for PDP's newsletters so that you receive this information as soon as it's available.

The Pensions Regulator (TPR)



Blog and dashboards tracker survey results

On 24 July 2025, TPR published a <u>blog - Don't miss your dashboards deadline over</u> <u>a data debt</u>, alongside <u>new research</u> which shows that while 80% of schemes are on track to connect by their 'connect-by date', there is still a lot to do to ensure that data is dashboards-ready. The blog confirms that over the coming months TPR will meet with the largest schemes in the country and scrutinise their preparations for dashboards.

Annual report and accounts for 2024/25 and corporate plan

On 17 July 2025, the Pensions Regulator (TPR) published its <u>annual report and accounts for 2024/25</u>. The report outlines TPR's performance, financial position and priorities over the year.

On the same day, TPR also published the year two update to its three-year corporate plan (2024 to 2027).

A press release was issued to accompany both publications.

Digital, data and technology blog

Paul Neville, Executive Director of Digital, Data and Technology at TPR, has published <u>a new blog: 'How collaboration will help pensions thrive in the digital, data and technology age'</u>.

In the blog, published on 1 July 2025, Paul outlined plans to launch a new Pensions Data and Digital Working Group this autumn. The group will bring together industry voices to support innovation and improve outcomes across the pensions sector.

The blog includes more details about the group and a link to an online form for those interested in joining.

The Pensions Administration Standards Association (PASA)



Guidance on data matching

PASA has recently published its updated Data Matching Convention guidance, which provides practical support for schemes on how to match data accurately and consistently.

HM Treasury

Inheritance Tax consultation response

On 21 July 2025, Government published their <u>response to the consultation on</u> inheritance tax (IHT) changes.

At the Autumn Budget 2024, the Government announced that for deaths after 5 April 2027:

- most unused pension funds and death benefits will be included in the value of a person's estate for IHT purposes
- pension scheme administrators (PSA) will be responsible for reporting and paying any IHT due on pensions to HMRC.

HMT <u>consulted</u> on the processes for these changes between 30 October 2024 and 22 January 2025.

Following significant concerns raised by the LGA and the pensions industry, HMT has amended its proposals. The key changes are:

- all death-in-service benefits from registered pension schemes will be excluded from the value of an individual's estate for IHT purposes, regardless of whether the scheme is discretionary or non-discretionary – currently nondiscretionary death-in-service benefits are included in the value of an individual's estate for IHT purposes
- personal representatives (PRs), and not PSAs, will be responsible for reporting and paying any IHT due on pension benefits
- PSAs will have new duties to support PRs in paying IHT on pension benefits
- to support PRs and beneficiaries who may struggle to pay IHT on pensions, the Government will offer multiple payment options. These include allowing pension beneficiaries to instruct PSAs to pay IHT in respect of pensions on

their behalf – though the pension beneficiaries remain liable for the IHT.

Next steps

HMT has published <u>draft clauses for inclusion in the Finance Bill 2025-26</u>. These are open for technical consultation until 15 September 2025. Comments should be sent to HMRC at <u>intonpensions@hmrc.gov.uk</u>. These clauses will amend the Inheritance Tax Act 1984. These include draft clauses that will bring relevant pension benefits into the estate for IHT purposes and provide for the right for beneficiaries to direct PSAs to pay IHT on their behalf. A <u>draft explanatory memorandum</u> and <u>policy paper</u> have also been published.

Annex A of the consultation response outlines the proposed new process for reporting and paying IHT from April 2027. HMRC will continue to work with industry experts, representative bodies and advisers to refine the process.

To legislate for the new process, Government will consult further on amendments to the Registered Pension Schemes (Provision of Information) Regulations 2006. Annex B of the consultation response sets out the expected changes.

The Government intends to publish tools and guidance to support PRs, PSAs and beneficiaries ahead of implementation in April 2027.

HMRC

Mandatory Scheme pays

Readers will be aware that the deadline for active and deferred members to make a mandatory scheme pays election in relation to the remedy was 6 July 2025.

HMRC have contacted us to confirm that given that some schemes are still issuing remediable service statements (RSS), to ensure that those members are not adversely impacted, Ministers have agreed to move the mandatory scheme pays deadline to 6 July 2027 to align with the deadline for pensioner members.

HMRC will include provisions to this effect in their next set of regulations, and they expect all remedy scheme pays elections to be treated as mandatory until the new, later deadline. A Pension Schemes Newsletter article will be issued confirming this position shortly.

Newsletter 171

HMRC published <u>newsletter 171</u> on 30 July 2025, which covers:

- **Inheritance tax**: a summary of the government's response to the recent consultation (see <u>earlier article</u>)
- LTA protection look-up service: guidance on how to access the service when it moves to the Managing pension schemes service later this year
- Managing pension schemes service: a reminder that all pension schemes

must now use this service to update HMRC and meet their reporting duties.

The Pensions Ombudsman

Cheshire FRA Ombudsman Case CAS-76722-Z3Z9

On 19th June the Pensions Ombudsman published their determination in case <u>CAS-76722-Z3Z9</u>. The case relates to the Modified 2006 Scheme.

The member, who had a retained contract with Staffordshire FRS and a concurrent wholetime contract with Cheshire FRS disputed that he was not afforded the opportunity to convert his standard 2006 whole-time service into special 2006 service. Cheshire FRS did not issue the member with an expression of interest letter under rule 5A(4) of the The Firefighters' Pension Scheme (England) (Amendment) Order 2014 as they did not believe the member was eligible for the scheme in their wholetime contract due to the overlapping service, and as per rule 5A(2)(b)(iii), had not been 'required' to remain in their retained role in another service when taking up their wholetime role in Cheshire.

The PO found that, in order to achieve the full purpose of the legislation, which was to remove less favourable treatment compared to a person who was a wholetime firefighter in the period up to April 2006, the member should be entitled to convert their standard service to special service. They found that Cheshire had breached it's statutory duty in failing to issue the notice under rule 5A(4). The PO did not interpret rule 5A(2)(b)(iii) as requiring the special member's employment as a retained firefighter and as a regular firefighter to be with the same authority. The PO also found that as Cheshire, was aware of and, had agreed the member's dual service, this fell within rule 5A(2)(b)(iii).

Whilst this was not the policy intention of regulation 5A(2)(b)(iii), which was for members whose FRA had 'required' them to remain in their retained role as a condition of them taking on a wholetime contract, the PO has interpreted the wording of the regulations differently.

It is the responsibility of each FRA to interpret regulations. Whilst this PO case is specific to circumstances in Cheshire and not binding on any other FRA, FRAs may wish to be mindful of this ruling if they receive any IDRP complaints of a similar nature.

Annual report and accounts for 2024/25

On 17 July 2025, the Pension Ombudsman (TPO) and the Pension Protection Fund Ombudsman (PPFO) jointly published their annual report and accounts for 2024/25. The report outlines:

- the activities and performance of both TPO and PPFO over the year
- key service improvements and casework volumes
- the financial position for the reporting period.

TPO also published <u>a press release</u> to accompany the publication of the 2024/25 report.

Useful links

- o The Firefighters' Pensions (England) Scheme Advisory Board
- FPS Regulations and Guidance
- o FPS Member
- Khub Firefighters Pensions Discussion Forum
- o FPS1992 guidance and commentary
- The Pensions Regulator Public Service Schemes
- o The Pensions Ombudsman
- o HMRC Pensions Tax Manual
- LGA pensions website
- o LGPS Regulations and Guidance
- LGPC Bulletins
- o LGPS member site
- o Scottish Public Pensions Agency Firefighters
- Welsh Government Fire circulars
- Pensions Dashboards
 - TPR guidance and checklist
 - o <u>DWP guidance on connection</u>
 - o PASA connection readiness guidance

Contact details

Raising a query

If you have a technical query, please complete the 'query form', that is available on the member area of the FPS regulations and guidance website and email bluelightpensions@local.gov.uk and one of the team's Firefighters' pension advisers will get back to you. To avoid delays in receiving a response, please avoid emailing advisers directly.

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