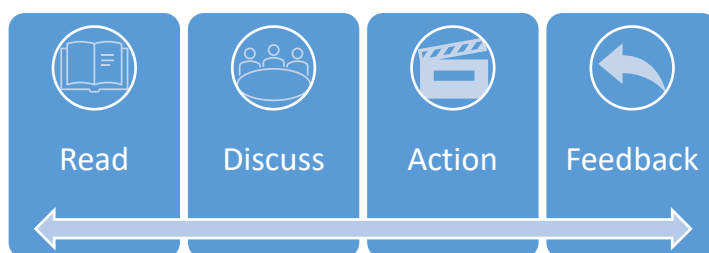


FPS Bulletin 97 – September 2025

Welcome to issue 97 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 [main bulletin page](#) 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	7 October 2025 28 October 2025
FPS Technical Working Group	24 November 2025
SAB	11 December 2025
FPS Communications Working Group	15 October 2025 29 January 2026 7 April 2026 21 July 2026 15 October 2026
Local Pension Board training	22 January 2026 (MS Teams) Refresher Training: 8 December 2025 (MS Teams)
LPB Chair Forum	30 October 2025
Administrator Forum	13 October 2025 10 November 2025 8 December 2025
LGA FRA drop-in session	23 October 2025 21 November 2025 23 December 2025
IDRP Training	29 October 2025
Induction Training	24 October 2025

Actions arising

Scheme Managers

[Training and Development](#): are encouraged to:

- allow their employees to attend the relevant training on offer, where it will help with their role and ongoing development.
- inform us of any specific areas of pensions training that they would like to see.

[GAD Calculator](#): Scheme managers should ensure that those who are involved with the Matthews exercise are aware of the new version of the calculator. The new version of the calculator supersedes previous versions. Previous versions of the calculator should no longer be used. Future interest files will only work with the latest version of the Matthews 2 calculator. FRA's should carefully review whether any

previously issued statements or payments affected by the changes described below need to be revisited.

[Matthews Project Implementation Data request](#): FRA's to complete the Project Implementation data request and return to the bluelightpensions@local.gov.uk by **22 October 2025**

Local Pension Boards

[Local Pension Board Training Sessions](#): are encouraged to book onto the relevant session for them

Age Discrimination Remedy updates

Contingent Decisions – scheme manager guidance

Following the coffee morning we held on [contingent decision – optants outs](#), we are pleased to confirm that we have published updated scheme manager guidance on the [Retrospective remedy](#) section of the [FPS regulations and guidance](#) website.

We are currently working on updating the member guidance and we will update the sector accordingly, once this has been complete.

Matthews exercise updates

GAD calculator

GAD will be releasing version 2.8 of the Matthews 2 calculator today to correct issues with pension increases for certain special pensioner members. This affects retirement dates shortly before the 2017 PI order date which are due a 0% pro-rata increase and subsequent 0% pro-rata periods for PI order dates since.

Support has temporarily disabled for pensioner member cases with a first Matthews exercise purchase wanting to convert connected standard service at the second Matthews exercise. GAD is developing a fix for back payments for these members which could previously be overstated. GAD expect to re-enable this functionality in the next release of the calculator, version 3. Version 3 is due to be released soon after the changes proposed in *Amendments to the Firefighters' Pension Scheme: retained firefighters* consulted on in December 2024 are implemented.

GAD will be separately releasing the October 2025 interest file shortly via the usual process.

ACTION: Scheme managers should ensure that those who are involved with the Matthews exercise are aware of the new version of the calculator. The new version of the calculator supersedes previous versions. Previous versions of the calculator should no longer be used. Future interest files will only work with the latest version of the Matthews 2 calculator. FRA's should carefully review whether any previously issued statements or payments affected by the changes described below need to be

revisited.

Project Implementation Data request

Further to our request in [FPS Bulletin 82 - June 2024](#) we would now like to collect the data for period 1 July 2025 to 30 September 2025.

Please complete the return which you can access via this link [Project Implementation data request](#). Earlier templates will not capture the detail we are now asking you to provide.

As shared during their Fire AGM presentation on the 2024 scheme valuation, GAD need to rely on this quarter's data to inform their review of Employer Contribution Rates to apply from April 2027. GAD have asked FRAs to respond in good time to this quarter's data and particularly consider the following areas:

1. Amounts are included under the correct column (and ideally sense checked against previous quarter responses on file).
2. Amounts include latest totals for the full exercise to date. (e.g. all statements sent to eligible firefighters since October 2023, not just during the previous quarter)
3. FRAs are welcome to annotate or comment on fields – especially if they are unsure which figure to provide – this helps GAD identify consistent information. E.g. this response earlier this year for “Total number of individuals who have replied and expressed an interest”: “‘aaa’ members expressed interest, of which ‘bbb’ were eligible for Matthews 2”

ACTION: FRA's to complete the Project Implementation data request and return to the bluelightpensions@local.gov.uk by **22 October 2025**

Any FRAs with questions can also attend the October coffee morning on 7 October 2025 to raise any questions for GAD.

FPS

General technical query log

The [current log of queries and responses](#) 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.

There have been no technical queries in September 2025.

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

The technical query logs can be accessed by practitioners in the restricted area of the FPS regulations and guidance website under the sections '[Age Discrimination remedy technical queries](#)' and '[Special members of the FPS 2006 technical queries](#)'.

The Matthews GAD calculator query log can be accessed through the tab 'Calculator query log' in the Special members of [FPS 2006 - GAD calculator](#) section of the FPS Regulations and Guidance website.

The logs are updated monthly in line with the bulletin release dates.

As a reminder if you have a query relating to either the [Age Discrimination remedy](#) or [Matthews](#) GAD calculators you can email GAD using their dedicated inboxes

FirePoliceMcCloudTaxInterest@gad.gov.uk

Firematthewscalculator@gad.gov.uk

Training and Development

Training and Development

Details of our training sessions are included on the [Training and Development](#) section of the [FPS regulations and guidance](#) website. The section sets out the training topics, dates that are available and how to book.

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.
- inform us of any specific areas of pensions training that they would like to see.

Local Pension Board (LPB) Training Sessions

Details of the LPB training sessions are included on the [‘Training and Development’](#) section of the [FPS Board](#) website. The section sets out the dates that are available and how to book.

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 Annual Conference

You can read our write up on the annual conference and view the slides from both days on the [Fire pensions annual conference](#) section of the [FPS regulations and guidance](#) website.

FPS coffee mornings

Our MS Teams coffee mornings are continuing in October 2025. 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.

We are pleased to include the presentations from recent sessions below:

8 September 2025 – [Contingent Decision – Optant out](#)

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 Scheme Advisory Board (SAB) updates

New Fire SAB inbox

As part of the ongoing work to improve communications between the SAB and LPB’s a new dedicated SAB inbox has been created, fireSAB@local.gov.uk. This inbox will be monitored by the SAB Secretariat with the relevant consultation with the SAB.

Annual Report

The Board Chair, Joanne Livingstone has published the Board’s first [Annual Report](#).

The report provides an overview of the work that the SAB has carried out over the last twelve months (May 2024 to June 2025), governance arrangements and the business plan and priority work over the coming twelve months (June 2025 to May

2026¹).

This is an important piece of work to highlight the various workstreams that the Board have led on and will continue delivering to support FRAs and the scheme, in line with its statutory duties.

Any comments on this publication please contact the fireSAB@local.gov.uk.

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

Amendments to the Pensions Schemes Bill in response to the Virgin Media judgment

The Government has introduced new amendments to the [Pension Schemes Bill](#), currently being reviewed in the House of Commons. These changes aim to fix problems highlighted by the recent Virgin Media v NTL Pension Trustees court case, which questioned whether some past changes to workplace pension schemes were legally valid.

The new clauses 100 to 103 would allow for retrospective actuarial validation of past changes where certain conditions are met. The amendments also include separate rules for schemes based in Northern Ireland.

You can view the most recent draft of [the Bill on Parliament's website](#).

Pensions Dashboards Programme



¹ Inline with the business plan and budget cycle

Dashboard Programme – Publications

PDP publish regular [publications](#) about the Pensions Dashboards and the Programme which you can find on their [website](#).

The Pensions Regulator (TPR)



TPR launches consultation on new enforcement strategy

The Pensions Regulator (TPR) has launched a consultation on its proposed enforcement strategy, aiming to modernise how it protects savers and regulates workplace pensions.

Published on 16 September 2025, the strategy sets out a more focused, agile and outcomes-driven approach. TPR wants to act earlier, intervene smarter, and deliver better outcomes for savers. The new model focuses on transparency, proportionality and collaboration, aligning with TPR's statutory objectives and its shift towards a more prudential style of regulation.

To support the launch, Gaucho Rasmussen, Executive Director of Compliance and Enforcement Group at TPR, has published a [blog on the new strategy](#).

TPR is inviting feedback from across the industry to assess whether the strategy is clear, effective and free from regulatory gaps.

The consultation closes on 11 November 2025. You can read the [consultation on TPR's website](#).

PASA



PASA publishes Dashboards Toolkit on Warnings and Unavailable Codes.

The Pensions Administration Standards Association (PASA) has released a new dashboards toolkit to help schemes prepare for connection and compliance.

This latest guidance focuses on warnings and unavailable data. It provides practical advice on how schemes should respond when estimated retirement income or accrued value data is missing. It outlines best practice for using error codes and returning appropriate warnings to dashboards.

These warnings help inform dashboard users about specific circumstances affecting their benefits, such as the presence of a scheme pays debit.

The toolkit builds on PASA's previous resources and reflects input from across the industry. You can read the full [guidance on PASA's website](#).

The Pensions Ombudsman

The Pensions Ombudsman's determination CAS-81940-Z2S8

The Pensions Ombudsman made a determination regarding a member of the British Steel Pension Scheme transferring his pension to a Small Self-Administered Scheme (SSAS) in 2014.

The member argued that British Steel Pension Fund's trustees did not carry out sufficient due diligence and did not warn him of scam indicators, which led to significant financial loss after investing in an unregulated overseas property scheme. TPO did not uphold the member's complaint.

This case looks at the statutory transfer requirements under the Pension Schemes Act 1993 at the time of the transfer. It also considers whether the scheme had to follow the due diligence checklist in the Action Pack or the Scorpion leaflet. In reaching the decision, TPO considered:

- the scheme's obligations to meet the express transfer provisions of the Pension Schemes Act 93.
- statutory due diligence requirements
- regulatory due diligence obligations
- the Common Law duty of care in negligence – ie whether there was a duty of care to go beyond the legislative requirements and nonetheless carry out the due diligence suggested by the Action Pack
- equitable duties of care.

This is an important case and will be of interest to administering authorities dealing with similar appeals for transfers between February 2013 and 30 November 2021 (the date the Occupational and Personal Pension Schemes (Conditions for Transfers) Regulations 2021 came into force).

You can read the [full determination on The Pensions Ombudsman's website](#). The Ombudsman has also published [a news article](#) to alert the pensions industry.

HMRC

HMRC Newsletter 173 – September 2025

[HMRC's newsletter 173](#), published 25 September 2025, includes updates for scheme administrators on:

- **HMRC / FCA statement on returning tax-free lump sums:** HMRC and the Financial Conduct Authority (FCA) have clarified that tax consequences from taking tax-free lump sums generally cannot be reversed, even if payments are returned or contracts cancelled.
- **Qualifying recognised overseas pension schemes** – HMRC is replacing the APSS262 form with a new online feature for reporting transfers to overseas pension schemes (QROPS). This will be available through the Managing Pension Schemes service. Schemes with a Pension Scheme Tax Reference starting with “0” must migrate to use it. HMRC is also inviting scheme administrators to take part in user research to help improve the service. Please email laura.klonowska@digital.hmrc.gov.uk if you are interested in taking part.
- **Technical updates for the abolition of the lifetime allowance** – HMRC is preparing further changes to tidy up the legislation, fix inconsistencies and make sure everything works smoothly following the abolition of the lifetime allowance. These will include changes to the valuation of crystallised pension rights for trivial commutation lump sums, ensuring consistency with the pre-April 2024 rules. The changes will apply retrospectively from 6 April 2024. HMRC plans to consult with the industry later this year and will share more details in future newsletters.
- **Deadline reminder for the pension scheme return** – From the 2024/25 tax year, all pension scheme returns must be submitted using the Managing Pension Schemes service. Only schemes that receive a notice to file need to submit a return. The deadline is 31 January after the tax year ends. If a scheme is migrated after 31 October 2025, the deadline is three months from the notice date. HMRC has published a video guide to help administrators understand the process.

Useful links

- [The Firefighters' Pensions \(England\) Scheme Advisory Board](#)
- [FPS Regulations and Guidance](#)
- [FPS Member](#)
- [Khub Firefighters Pensions Discussion Forum](#)
- [FPS1992 guidance and commentary](#)
- [The Pensions Regulator Public Service Schemes](#)
- [The Pensions Ombudsman](#)

- [HMRC Pensions Tax Manual](#)
- [LGA pensions website](#)
- [LGPS Regulations and Guidance](#)
- [LGPC Bulletins](#)
- [LGPS member site](#)
- [Scottish Public Pensions Agency - Firefighters](#)
- [Welsh Government Fire circulars](#)
- Pensions Dashboards
 - [TPR guidance and checklist](#)
 - [DWP guidance on connection](#)
 - [PASA connection readiness guidance](#)

Contact details

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.

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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While every attempt is made to ensure the accuracy of the bulletin, it would be helpful if readers could bring any perceived errors or omissions to the attention of the Bluelight team by emailing bluelightpensions@local.gov.uk.