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TPR enforcement strategy consultation

This response is submitted on behalf of the 44 delegated scheme managers in England responsible for the administration of the Firefighters' Pension Scheme (FPS). These scheme managers are all members of the Local Government Association (LGA), a politically led, cross-party membership organisation representing 315 of the 317 councils and all 44 fire and rescue authorities in England.

The response has been prepared by the LGA's Pensions Team, who provide dedicated support to FPS scheme managers and administrators, as well as to those involved in the Local Government Pension Scheme (LGPS).

Please do not hesitate to contact me if you have any questions about this response.

Yours faithfully

A handwritten signature in cursive script that reads "C Johnson".

Claire Johnson

Senior Pensions Adviser (Firefighter's)

General comments

We welcome TPR's commitment to improving governance standards across public service pension schemes and support a proportionate, risk-based enforcement regime that focuses resources where member harm is most likely. Clearer expectations and published standards from TPR help scheme managers plan compliance activity and prioritise risks effectively. We also support greater transparency in enforcement outcomes so that schemes and members can better understand the impact of regulatory action.

That said, we believe there are areas where the current approach could be strengthened:

- 1. Reporting of material breaches without visible follow-up**

Scheme managers are expected to report all material breaches to TPR, and in recent years we've seen a significant increase in reporting activity within the fire sector. However, there is little evidence of follow-up or feedback from TPR, which undermines confidence in the process and makes it difficult to explain to members what enforcement is intended to achieve.

- 2. Remedy and the spike in breach reporting**

The Sargeant/McCloud and Matthews remedies have triggered a sharp rise in breach reports. In most cases, the underlying causes have been unrealistic implementation timescales set by HMT, delayed or retrospective regulations, and a lack of detailed technical guidance. These are systemic issues rather than governance failures, and we've yet to see TPR engage publicly with HMT to address them.

- 3. Lack of feedback and published outcomes**

Scheme managers would benefit from clearer feedback on reported breaches, including expected timelines for TPR action and examples of enforcement outcomes. Without this, it's difficult to assess whether reporting is driving improvements or influencing policy.

The FPS is currently navigating a period of significant change and complexity, particularly in relation to remedy implementation and ongoing regulatory developments. In this context, we welcome TPR's intention to prioritise enforcement based on impact, scale, and complexity. We also believe enforcement should continue to be underpinned by education, support, and enablement — with formal powers used proportionately and transparently.

We look forward to continued engagement with TPR and would welcome further dialogue

on how enforcement can be applied in a way that supports scheme managers, protects members, and drives meaningful improvement across the Firefighters' Pension Scheme.

Responses to consultation questions

1. Do you agree with the overall direction of the proposed enforcement strategy?

Yes, we agree with the overall direction of the proposed enforcement strategy. A more focused and outcome-driven approach to enforcement is a welcome development and has the potential to deliver real benefits for members.

2. Is our approach sufficiently transparent and accountable?

The proposed approach is well-articulated, and we welcome its focus on prevention and improved governance. However, it remains unclear how the stated objectives will be delivered in practice and how success will be measured. We would be keen to understand how TPR intends to strengthen engagement with public service pension schemes to support implementation. While we support the publication of enforcement outcomes, we would also welcome clarity on how preventative activity will be tracked and communicated — particularly in terms of demonstrating impact and value to schemes and members.

Recent experience within the Firefighters' Pension Scheme highlights several concerns with the current approach. While scheme managers are expected to report all material breaches, many have seen little or no follow-up from TPR, which undermines confidence in the process and its purpose. The Sargeant/McCloud and Matthews remedies have led to a significant increase in breach reporting, largely driven by unrealistic implementation timelines, delayed regulations, and limited guidance — systemic issues beyond the control of scheme managers. Additionally, the lack of feedback and published enforcement outcomes makes it difficult to assess whether reporting is driving meaningful change or influencing policy. Greater transparency and engagement from TPR would help address these concerns.

3. Does the strategy clearly explain how enforcement decisions will be made and prioritised from a strategic perspective?

Yes, the framework built around impact, scale, complexity, and outcomes is well-structured and makes sense.

4. Are there any areas where the proposed strategy could be clearer or more

accessible?

We broadly support the direction of TPR's enforcement strategy, particularly its focus on risk and member outcomes. However, greater clarity is needed on how TPR will determine what matters most to members, and how it will measure success. Administration quality and data integrity should be central to its risk assessment approach.

Further detail is also needed on how TPR will use data and digital tools, including whether new reporting requirements will be placed on public service schemes.

Finally, the strategy is currently high-level and lacks specific reference to how it will apply to the Firefighters' Pension Scheme.

5. How well do you feel the strategy aligns with our broader shift toward a more prudential, risk-based regulatory model?

The strategy is consistent with the TPR shift. The emphasis on acting early to prevent harm is particularly welcome, as it aligns with the proactive approach scheme managers strive to take in delivering member outcomes.

6. Are there any risks or unintended consequences arising from our new strategy you think we should consider?

We echo the comments raised by Lorraine Bennett on behalf of the LGPS team at the LGA:

Using data to guide decisions is sensible in principle, but it carries risks if the data is not robust — particularly where it is self-reported.

The proposal to deploy staff more flexibly across different types of cases may offer operational benefits, but it raises concerns about whether those staff will have sufficient understanding of the specific structure and complexities of the Firefighters' Pension Scheme.

7. Are there additional safeguards or clarifications you would like to see?

Greater clarity would be helpful on the data sources TPR intends to use to guide enforcement decisions, and how collaboration with external bodies will support this process.

8. How can we best measure the success of this strategy in delivering real-world outcomes for savers?

Success should be measured by tangible improvements in member experience and scheme resilience. For the Firefighters' Pension Scheme, this means fewer delays in

benefit processing, clearer communication with members, and greater confidence in the accuracy of pension records. If the strategy leads to earlier intervention, better support for scheme managers, and visible enforcement outcomes where risks are identified, it will help build trust in the system.

Key indicators of success could include:

- Reduction in repeated breaches, especially those linked to employer performance
- Improved data quality and administration standards across fire schemes
- Timely resolution of reported issues with clear feedback from TPR
- Evidence that enforcement activity is preventing harm rather than reacting to it
- Positive feedback from scheme managers and members on regulatory engagement

Ultimately, success should reflect a more proactive, transparent, and supportive regulatory environment that helps scheme managers deliver better outcomes for firefighters.

9. We expect to review and update our wider suite of enforcement policies in light of this strategy. Are there any specific areas or policies you believe should be prioritised for review?

No.

10. Do you have any other comments, suggestions, or concerns about the draft enforcement strategy?

No.