



Firefighters' Pensions Annual Conference

Thursday 19 September 2024 18 Smith Square, London



Chair's welcome

Joanne Livingstone, Chair, Firefighters' Pensions (England) Scheme Advisory Board



Emergency procedures

Please familiarise yourself with the emergency evacuation procedures

EMERGENCY

PROCEDURES

On hearing the fire alarm (a continuous siren)

Leave the building immediately and proceed to the assembly point: Tufton Street

Wait at the assembly point until given the all clear to return to the building

DO NOT USE THE LIFTS
DO NOT STOP TO COLLECT PERSONAL BELONGINGS
DO NOT RE-ENTER THE BUILDING UNTIL AUTHORISED TO DO SO



Agenda

Chair's welcome and introduction
The Home Office – A View from Government
Technical Workshops
DAC Beachcroft – Legal update
First Actuarial – Driving up to valuation
Pensions Dashboards Panel
Isio – The Problem with People and Pensions
Aon – Pensions in the digital age
Closing remarks

The Home Office – A view from Government

Helen Fisher, Head of Police and Fire Pensions - Police Workforce and Professionalism Unit, Public Safety Group, Home Office

Simon Primmer, Head of Police and Fire Pensions - Police Workforce and Professionalism Unit, Public Safety Group, Home Office



Firefighters' Pensions Workplan 2024 -2026

Presented by: Simon Primmer

Date: September 2024

Firefighters Pensions 2024 – 2026 Workplan

Matthews

- a) Implementation GAD cases
- b) Amendments Compensation Framework and Guidance
- c) Compensation Forecasts and Payments
- d) Ongoing Litigation Aggregation

Contribution Yield

- a) Consultation
- b) Equalities Impact Assessment
- c) Implementation

McCloud

- a) Implementation Timings
- b) Tax Rules and HMRC Digital Service
- c) Compensation AME Forecasts and Payments

Finance - BAU

- a) Valuation
 - i. Data
 - ii. Assumptions
 - iii. Results
- b) OBR AME Top-up

Governance

- a) Firefighters Scheme Advisory Board (FSAB)
- b) Firefighter Medical Appeal Board(FMAB) Contract Management

Refreshments and networking





Technical workshops



W1: **Civica Clients** – Technology in Pensions 2025 and Beyond – (*Main Room*)

W2: **Heywood Clients** – Engaging with members in a digital world – redefining self-service – (*Smith Square 1&2*)









Providing a service to support your members for the next 20 years...



A changing landscape...

82%

of local government staff worked from home (Mar/Jun 20)

800+

attacks every hour on the local government

24h

for NHS to do 13 years of human analysis

80%

Decrease in calls to 111 line after introducing CovidCare NI

65%

of UK citizens aged 70+ use a smartphone daily

Stronger resilience & availability

- Guaranteed availability
- Work from anywhere
- Proactively maintained
- Business continuity
- Backups & DR

Advanced security

- Security updates
- Monitoring
- DDoS protection
- Privacy guidelines
- Authentication eg MFA

Better insights & integration

- Insightful reporting
- Data linking
- Performance
- Integration to other SW

Higher productivity

- Upgrades
- Streamlined process
- Best practice
- Better user experience
- Automatic updates

Faster, sustainable, green innovation*

- Chatbots
- Advanced Analytics
- Mobile
- Al
- ID & V.



{Future vision



Future vision

The role of the administrator

- Remove tedious administration tasks
- Invest in services to employers and members

The vision for the member

- Quicker and easier access to services and information
- Better retirement outcomes

Artificial Intelligence

- Co-pilot to build administrator knowledge
- Fast decision making tools

Automation

No more manual intervention

Seamless software solutions

- Reduced overhead of management
- Focus on core activities



ideas into action

Lunch







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Thursday 19 September 2024 18 Smith Square, London



Chair's welcome back

Joanne Livingstone, Chair, Firefighters' Pensions (England) Scheme Advisory Board

Legal update: DAC Beachcroft

Jane Marshall, Partner – Employment, Pensions and Immigration, DAC Beachcroft



FIREFIGHTERS' PENSIONS AGM - LEGAL UPDATE

THURSDAY, 19TH SEPTEMBER 2024

Jane Marshall



PO determinations in the last year

- Only 3 decisions in the last year relating to the Firefighters' Pension Scheme
- o Topics:
 - Pensionable pay & CETV not upheld
 - Refund of contributions following opt-out not upheld
 - Administration of the Modified Scheme not upheld
- Expanded search to relevant decisions in relation to the LGPS
- 18 decisions in the last year
- Discretionary death benefit case partially upheld

FIREFIGHTERS' PENSION SCHEME CAS-72510-R0F4 Mr S Humberside Fire & Rescue Service

Background

- Mr S joined the 2006 Scheme
- 22 May 2014 Mr S was given the opportunity to join the Modified Scheme
- Mr S's personalised statement confirmed cost of modified benefits -£16268.61, including interest
- On returning the options form it was confirmed to Mr S that the contribution arrears amounted to £16,449.88, which could be paid as a lump sum or by monthly installments of £167.83 over 10 years
- Revised contribution arrears where then provided to Mr S, confirming £16,905.31, amounting to monthly installments of £171.63

Background

- Mr S then confirmed likely retirement date of July 2019 and asked for an update on the contribution arrears
- HFRS confirmed 27 monthly payments had been made totalling £4,634.01, leaving a balance of £14,502.49 to be paid
- Mr S queried this figure
- HFRS advised that an error in a formula in a spreadsheet had resulted in it providing incorrect information and confirmed the outstanding balance was £12,271.30
- Mr S confirmed retirement date of 30 September 2019 and asked for an update on the contribution arrears
- HFRS confirmed Mr S would owe an estimated amount of £11,841.06

Background

- Mr S queried this as it was approximately £1,800 more than he had calculated
- Mr S raised an informal complaint and then a formal complaint under the IDRP
- o HFRS replied:
 - It was required to apply the Regulations that govern the Modified Scheme and these had been applied correctly
 - The contribution arrears of £16,449.88 was the amount if the sum had been paid immediately
 - The FBU had negotiated a 10-year repayment period, which resulted in further interest of £3,689.72 payable by Mr S
- Mr S submitted he had made the decision to join the Modified Scheme based on incomplete information provided by HFRS

Outcome

- The errors made in the information provided to Mr S amounted to maladministration
- The errors would have caused Mr S frustration, but Mr S has not suffered financial loss as a result of the errors
- The incomplete contribution figures were corrected before Mr S's enrolment into the Modified Scheme was complete, so he could have reconsidered his election to pay by instalments
- Main reason for difficulties in understanding some of the information provided by HFRS relates to the treatment of future interest on the contribution arrears
- The communications to Mr S did not deal with future interest in a consistent manner, but Mr S had been notified that future interest was payable

Outcome

- Thought was given to whether it would be appropriate for Mr S to receive payment for non-financial injustice i.e. distress and inconvenience
- On balance the circumstances of the case did not quite meet the threshold for a distress and inconvenience payment
- Mr S's complaint was not upheld

LOCAL GOVERNMENT PENSION SCHEME



- Complaint in relation to LGPS & distribution of lump sum death benefits
- Discretionary decision under LGPS similar to the Firefighters' Pension Scheme
- Local Government Pension Scheme:

"The appropriate administering authority may, at its absolute discretion, pay the death grant to or for the benefit of the member's nominee, personal representatives or any person appearing to the authority to have been a relative or dependent of the member."

o Firefighters' Pension Scheme:

"The scheme manager may, at its absolute discretion, pay any lump sum death benefit payable under this Chapter to or for the benefit of the member's nominee, personal representatives or any person appearing to the scheme manager to have been a relative or dependent of the member."

Background

- Deceased Mr N
- o Two children Mr NN & Ms AN
- Represented by mother and ex-wife of Mr N Mrs RN
- New wife Mrs N
- Mr N and Mrs RN divorced in 2013
- Mr N married Mrs N in 2017
- October 2017 Mr N completed expression of wish and named Mrs N as sole beneficiary of his death grant
- October 2017 Mr N made a will. He shared a recently bought property with Mrs N. He left his share to Mr NN and Ms AN, but Mrs N had the right to live in the property until re-marriage, co-habitation or until she no longer wished to live there. The will said Mrs N could sell the property to purchase another property if she wished to move.

Background

- 4 January 2018 in a Death Grant Nomination Form Mr N again named Mrs N as sole beneficiary
- o 29 January 2018 Mr N died
- At the time Mr NN & Ms AN were aged 17 & 15 respectively
- 13 March 2018 the death grant was paid to Mrs N by NCC
- 25 July 2018 Mrs RN complained on behalf of her children under the IDRP
- Complaint:
 - Mr NN & Ms AN had not been given due consideration
 - Mrs RN, Mr NN & Ms AN had not been approached for information
 - LGPS guidance from 2000 suggested an assumption that the widow was the person with most need, and also the individual with responsibility for a deceased's children

Background

- o IDRP outcome:
 - Stage 1 Mrs RN's complaint was not upheld
 - Stage 2:
 - NCC had not acted in accordance with its discretions policy
 - Mr N's will had not been considered
 - NCC should have requested further information about other potential beneficiaries
- After gathering further information, NCC decided it had applied its discretion appropriately and in line with Mr N's wishes and would not be making any changes to the death grant already paid

Outcome

- Ms AN & Mr NN complained to the PO
- NCC's original decision was not properly made
- It failed to follow well established principles in reaching its decision
- It failed to follow its own discretions policy
- NCC subsequently reconsidered its decision taking into account Mr N's will, the nomination forms, as well as asking the relevant questions of Mrs RN
- Having finally identified the potential beneficiaries it was for NCC to decide how to distribute the death grant
- The extent to which the PO can interfere in NCC's decision is limited

Outcome

- o PO can't exercise the discretion
- PO can only remit decision for NCC to reconsider if it failed to:
 - take all relevant matters into account and ignore any irrelevant matters;
 - ask itself the right questions;
 - direct itself correctly in law; in particular, it must interpret the Scheme Regulations correctly; and
 - not come to a perverse decision
- It is for NCC to decide what weight to give to the evidence

CAS-75613-N2J8 & CAS-75612-J0N8

Outcome

- The decision to pay Mrs N the death grant is within the range of possible decisions which a reasonable decision-maker could have reached on the facts of the case, so cannot be considered perverse
- NCC's procedural errors made prior to it reviewing its decision, together with the fact that it was more than three years after the death grant was paid, and only after the involvement of TPO, that it made a properly informed decision caused Mr NN and Ms AN nonfinancial injustice
- NCC's procedural errors merit a payment of £1,000 each to Mr NN and Ms AN for the serious distress and inconvenience suffered
- Mr NN and Ms AN's complaint was partly upheld

DAC BEACHCROFT 0.1 October 2024 37



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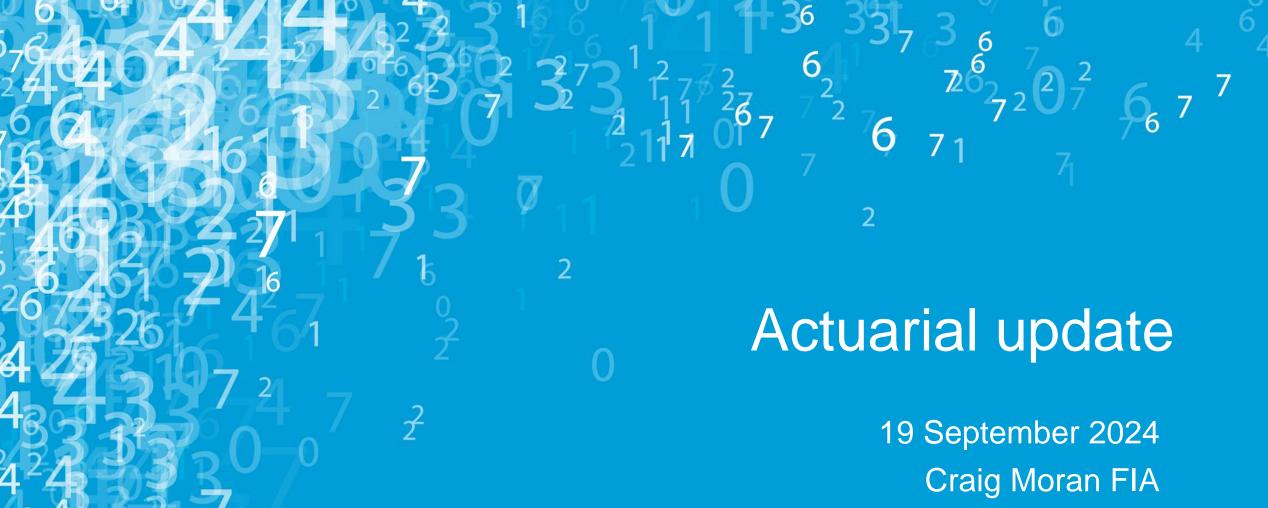
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Questions and discussion

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First Actuarial – Driving up valuation

Craig Moran, Actuary, First Actuarial Jame Allen, Actuary, First Actuarial



James Allen FIA

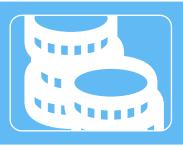


Valuation overview



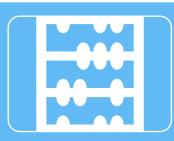
Why do we need a valuation?

- Required by law, in Public Service Pensions Act 2013
- Must be carried out every 4 years



Outcomes

- Set employer contribution rate from 1 April 2027
- Identify any breach of the cost cap



Who carries out the valuation?

- Government Actuary's Department (GAD)
- Using directions from HM Treasury



Different valuations for different purposes

The 'funding' valuation

Calculates the employer contribution rate

The 'cost cap' valuation

Tracks changes in future costs for reformed scheme members



But isn't the scheme unfunded?



- There are no actual assets, so use a notional asset value
 - At 31 March 2020, they were £19.0bn

Notional assets this valuation:

Notional assets at last valuation

- + contributions paid in
- benefits paid out
- + "notional investment returns"





Cost cap valuation

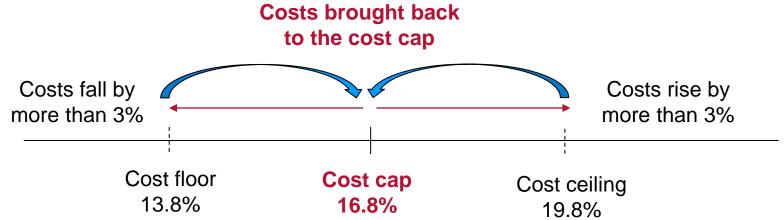
Cost cap valuation

Employer cost cap (target employer cost)

is compared with

Tracked employer costs of the reformed scheme

If the difference is more than 3%, then reformed scheme benefits and/or member contributions may need to be changed*





*subject to an 'Economic check'



Employer contribution rate

Cost cap correction: Change in employer contributions from restoring target cost of scheme

Cost of correcting surplus/deficit

Employer's share of cost of future benefits

These items could be positive or negative

Delivered by First Actuarial at Fire Pensions Annual Conference on 19 September 2024



2020 valuation

2020 valuation - Past service results



- The notional assets are less than the amount estimated to be needed to pay all promised benefits (i.e. the liabilities).
- This 'deficit' is spread over 15 years and added to the employer contribution rate.

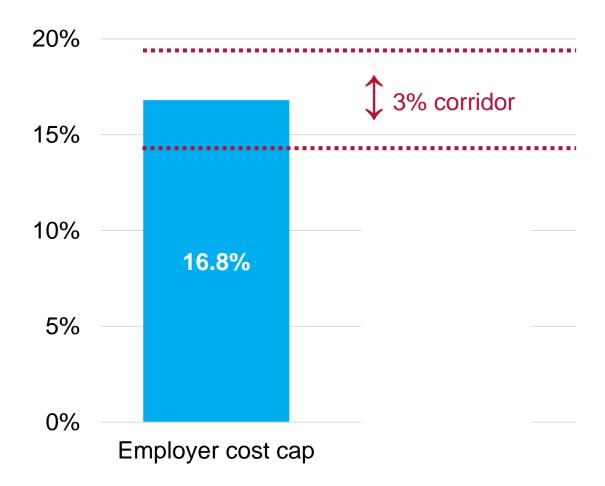
Liabilities

Notional assets

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Cost cap valuation





- The cost cap valuation revealed that the 'core cost cap' had fallen to 12.3%, outside of the 3% corridor.
- This triggered an 'economic check', to check whether benefit improvements would coincide with increases to employer contributions
- As this check pushed the cost back into (and above) the corridor, the Home Secretary was not required to consult on changes to the scheme.



2020 valuation - Employer contribution rate

Employer's share of future benefit build up

Spreading of past-service 'deficit'

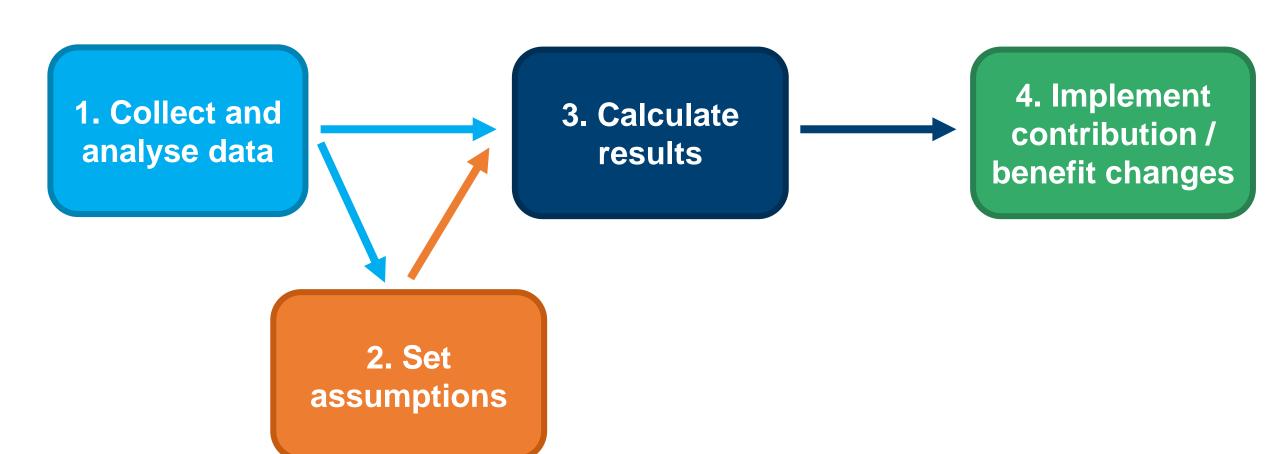
Other adjustments: Matthews (+5.2%), contributions received higher than benefits built up (-2.1%)

Total employer contribution rate (from 1 April 2024)



31 March 2024 valuation

Valuation process



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Data collection timeline

1 December 2024:

- FRAs provide GAD with membership data
- GAD provide FRAs with data validation tool

February 2025:

- FRAs provide GAD with movement data
- FRAs provide updates if any issues identified

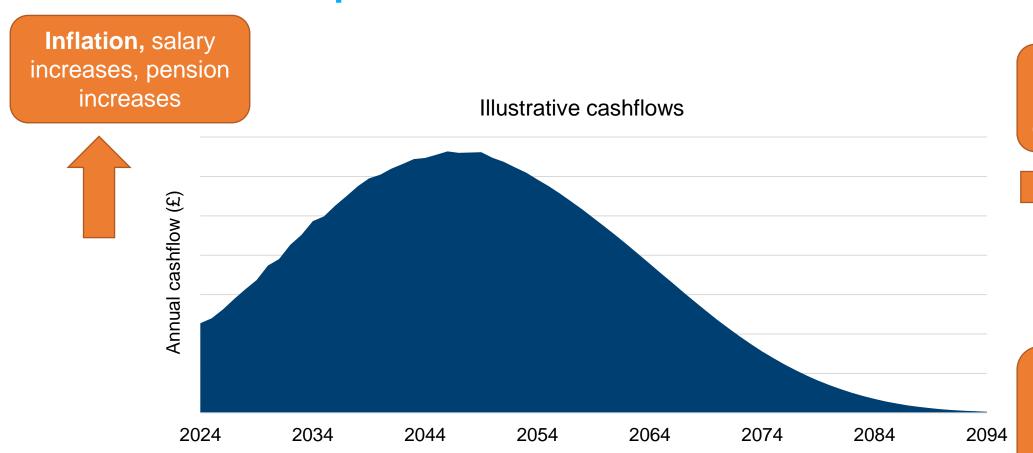
After 31 March 2025:

- FRAs provide data on positive Matthews elections

"The results of the valuation are critically dependent on the quality and correctness of the data used" - GAD's report on membership data for 2020 valuation of Firefighters' Pension Schemes (England).



How are pension liabilities valued?



Life expectancy of members and their dependants

Other key assumptions include cash commutation and retirement age

SCAPE* discount rate, used to discount the value of benefits back to the valuation date

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*Superannuation Contributions Adjusted for Past Experience



Who sets the assumptions?

HM Treasury Central

SCAPE discount rate

Mortality improvements

Rates of pension increases

Rates of CARE revaluation

Rates of salary increases

Commutation

State Pension Age

Deficit spreading periods

Home Secretary Scheme Specific

Mortality rates

Retirement ages

Promotional pay increases

Family statistics

Rates of withdrawal

Matthews take-up rates

GAD provides advice to Home Secretary on 'best estimate' scheme specific assumptions. This advice is based on analysis of data collected from each Fire Authority.

Delivered by First Actuarial at Fire Pensions Annual Conference on 19 September 2024 Assumptions setting is subject to change as part of 2024 valuation



Key assumptions (higher or lower)

Sensitivity of employer contribution rate



Delivered by First Actuarial at Fire Pensions Annual Conference on 19 September 2024

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Questions and discussion

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Pensions Dashboard Panel

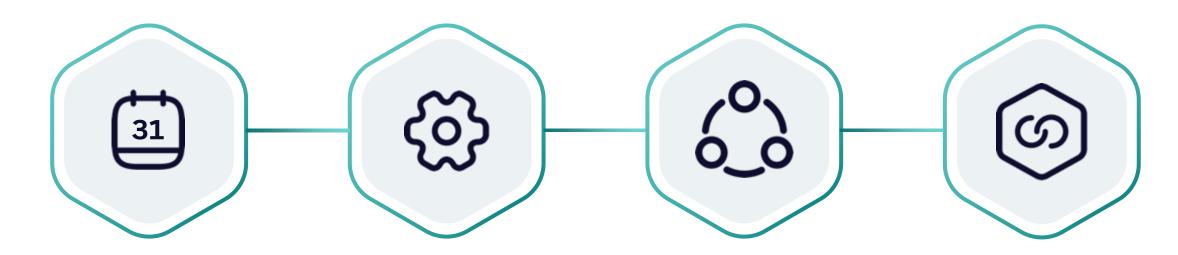
Joe Stacey, Senior Industry Engagement Manager, Pensions Dashboard Programme

Jo Eldridge, Industry Engagement Specialist, Pensions Dashboards, The Pensions Regulator

John Dale, Chief Strategy Officer, Heywood

Adam Gifford, Senior Policy and Propositions Manager, Money and Pensions Service (MaPS)

Pensions Dashboards Programme (PDP) update



Working towards connection timetable set out in DWP guidance

Legislative connection

deadline: 31 October 2026

Updated draft technical standards and code of connection published in August/September 2024 MaPS leading plans for user testing of live service in 2025, with PDP support Additional guidance around connection to be provided in PDP connection hub

What should scheme managers be doing now?



Read our guidance

Read our guidance and make sure you understand your dashboards duties, and what you need to do to prepare.

Decide how you will connect to dashboards

Look at the options available to you ie using your current pensions administrator, an integrated service provider, or building own connection solution.

Include pensions dashboards as an agenda item

Include pensions dashboards as an agenda item at board meetings to raise awareness of the steps you'll need to take to meet your duties.

Ensure data accuracy

Ensure data you use to match people with their pensions and to return the required pension value is accurate and complete.

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Getting data dashboard ready: four key steps





Understand

- Data you will receive from the digital architecture
- Data you will need to return to members and by when



Assess

- Current quality
- Digital accessibility



Consider

- Data items for matching criteria
- How to present and calculate the value



Put plan in place

- Improve the data quality
- Maintain the data quality

Pensions dashboards: Useful links



- TPR guidance: Pensions dashboards: initial guidance
- TPR checklist: <u>Preparing to connect: checklist</u>
- TPR compliance and enforcement policy: <u>Failing to comply with duties</u>
- TPR blog: Act now on pensions dashboards so we don't have to
- PDP FAQs: Code of connection, Technical standards, Queries
- PASA guidance (connection, matching, value, AVC): <u>Guidance</u>
- LGPS guidance: Connection guide
- LGPS guidance: <u>AVCs and Dashboards administrator guide</u>



How will schemes set and test their matching rules?

ISP console

Match configuration

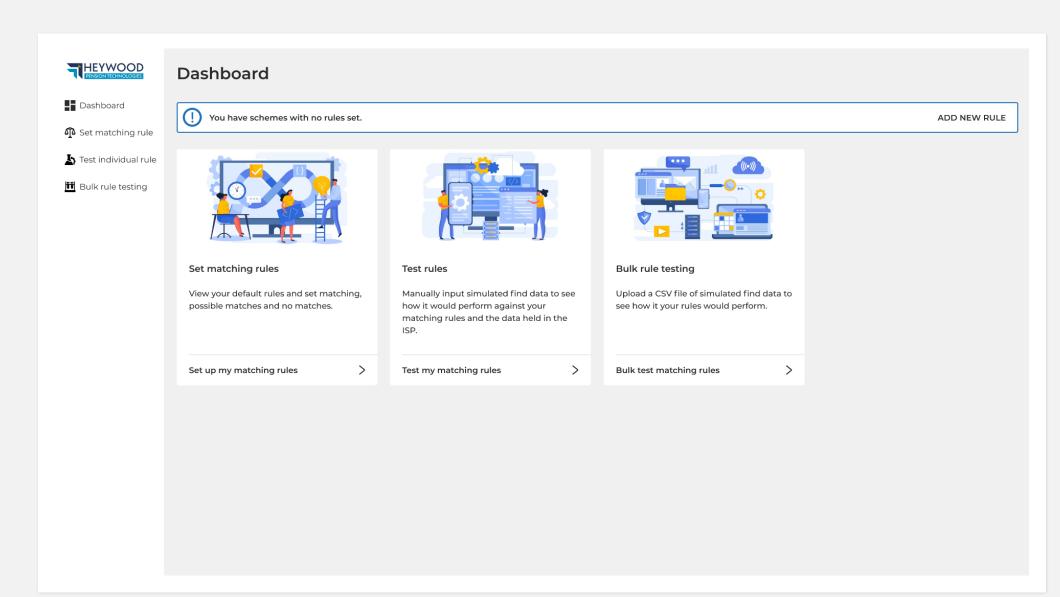
- PASA based rules
 - Flexible approach
- Global rules
 - Scheme overrides

Match testing

- Individual/bulk
- Match analysis
 - Match results
 - Configuration visualiser
- View data
- Bulk data extract



Match modeller



Pension Dashboard Panel Questions



Please wait for the roving microphone then state your name and authority / organisation prior to presenting your question.

#LGAFirepensions

Isio – the Problem with People and Pensions

Colin Dobbie, Senior Consultant and Actuary, Isio

The Problem with People and Pensions



The Problem with People and Pensions

Agenda

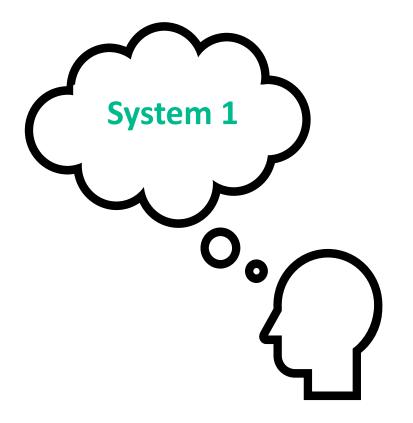
- 1. How do we think?
- 2. Why we find it difficult to engage with financial decisions
- 3. What we can do



Colin Dobbie IFA – Senior Actuary and Consultant, Isio

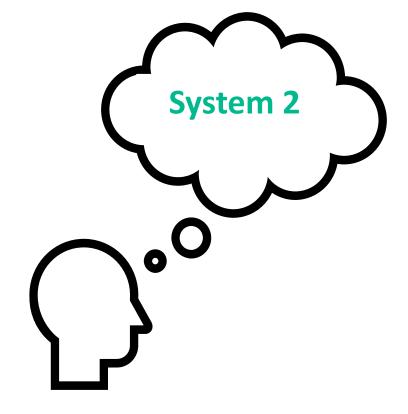


How do we think?



Fast, intuitive, impulsive

VS



Considered, rational, effortful

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Cognitive biases at play

There are over 150 identified cognitive biases

These biases can have a significant impact on how we make decisions



The Bandwagon Effect



How our behaviour is influenced by the people around us...

Loss Aversion



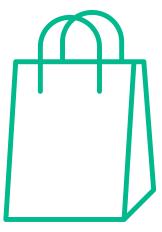
- We feel a loss more than we do a gain -



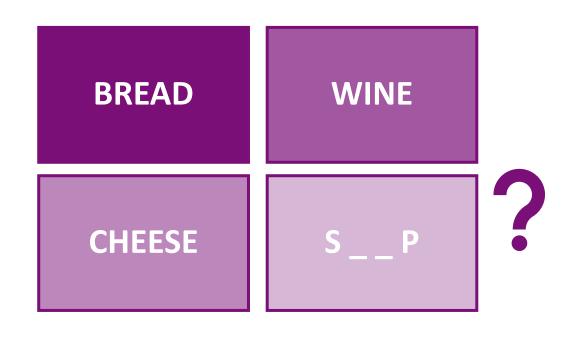
The Bye-Now Effect

BYE

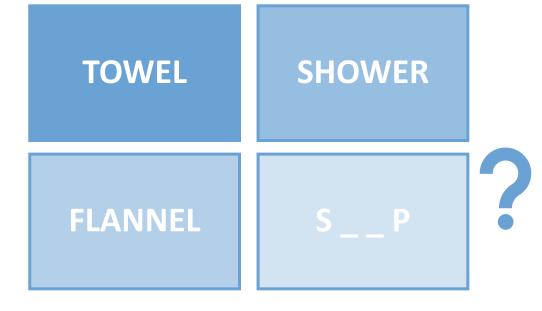
BUY



Priming in action



OR



How do we make financial decisions?



Money is a very high interest topic for people, finance, however, is a low interest topic.

Why? Finances are complicated and often intangible.

Financial behaviours are deeply ingrained: we often feel overwhelmed and resort to intuition.

Making financial decisions is deeply linked to our psyche.

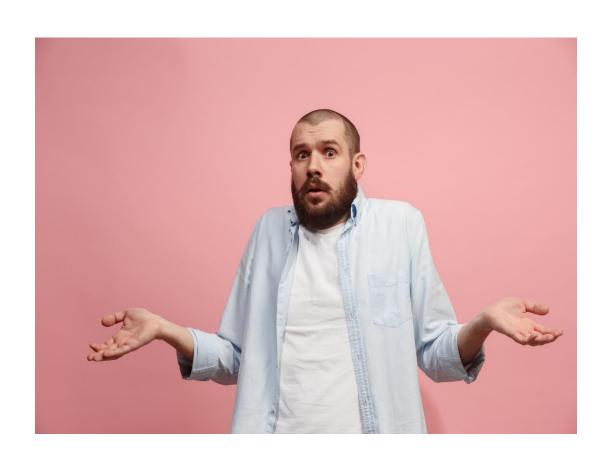
How do we make financial decisions?



'People don't always act rationally. In fact, they tend to act irrationally, but in predictable ways.'

Richard ThalerBehavioural economist

What can we do?

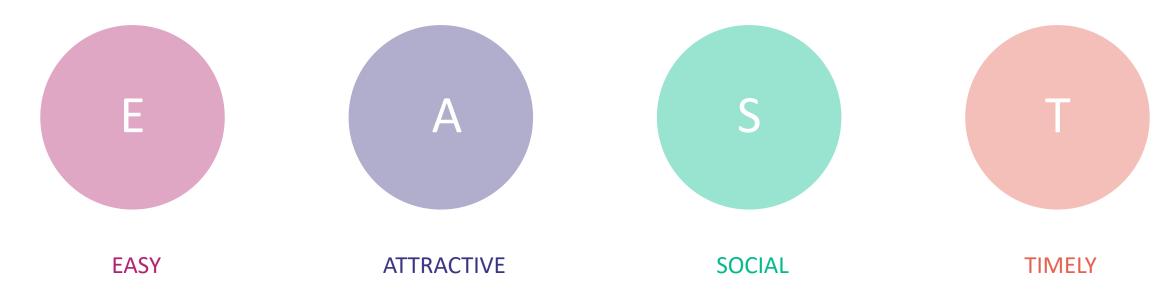


We need to work with the way people DO behave...

...rather than the way they **SHOULD** behave

What can we do?

How can we harness behavioural biases to nudge us towards better engagement?



And underpinning all of this: TEST, TEST, TEST!

Any questions?

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Colin Dobbie

Senior Actuary and Consultant colin.dobbie@isio.com



Aon – Pensions in the digital age

Ben Harris, Partner, Aon

AON



Pensions in the Digital Age

Firefighters' Pensions AGM Session

Prepared for: Firefighters' Pensions AGM

Prepared by: Aon

19 September 2024

Private and Confidential

What are we talking about?

- 1 Introduction
 Where are we starting from and what is the challenge?
- Case Study 1
 Tracing and paying ex-members
- 3 Case Study 2
 Driving self-service to solve a capacity crunch
- 4 Technology on the horizon
 How Al could accelerate change
- 5 The Future
 Pensions Industry 2.0?





1

Introduction

Pensions in the digital age



Technology – The Solution?

Digital Advances in Related Industries

Member Expectations Industry Capacity

Pensions Industry 2.0?





Where Are We Starting From?

Getting you involved



Pensions Administration Landscape

The rise in demand

The Current
Impacts on
administration
service

8% higher compared 2023

2022 equivalent YTD 13%

Increasing complexity

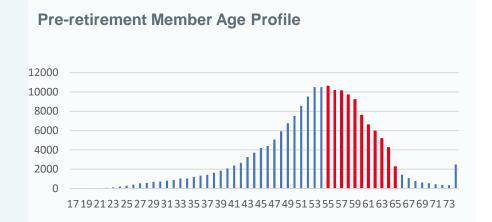
Cycle Time

Scam controls

Member choice

GMP Equalisation

Buy in insurer interaction





Availability of administration skill sets

Increased demand for project work

^

Evolving expectations

80%+
digital
engagement

Member choice to use digital communication over call and postal options

The Future

Investment to adapt and innovate to meet member expectations



2

Case Study 1

Tracing and paying exmembers



Charting a Path to Innovation

"Lloyds 2020" Solution

Implementing payment of GMP Equalisation Historic Transfer Top-Ups



AON





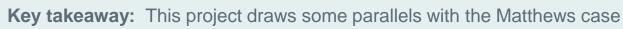
7,000Potential in-scope population

£10 - £40,000
Top-up payments due

Protect day-to-day admin "at all costs"

Proposition had to stand on its own



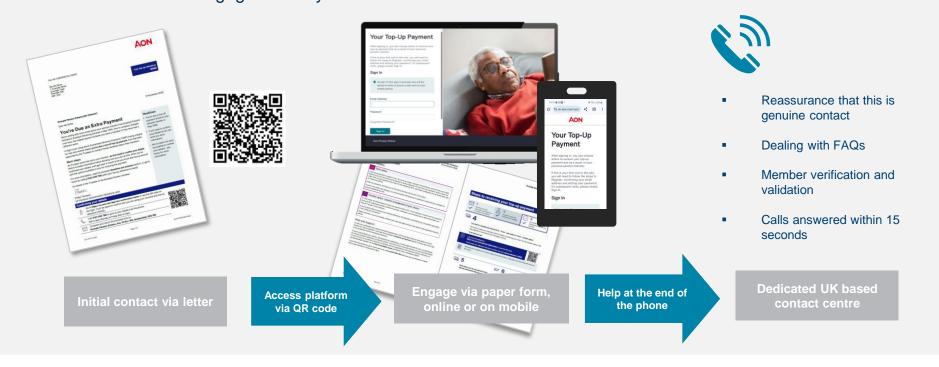


AON

The approach we took

Multi-pronged approach to member experience

Maximise engagement, maximise liability discharge:
Allow members to engage in a way that suits them



The Result:

A member journey that is measured **in days** rather than weeks or months



Triage

Trace and Verify



Validation



Interact



Pay



Sweep-up



Close

Ensuring provenance

Our approach to making sure it didn't feel like a scam

1

Explain why

Succinctly tell the story of why you are contacting, explain what's in it for them and recognise it is coming "out of the blue".



2

Specific information

Contain information that a scammer is unlikely to know e.g. service periods, former scheme names



3

External validation

Link to external sources of information that are hard to fake, e.g. long-established scheme websites, government etc.



4

Branding / design

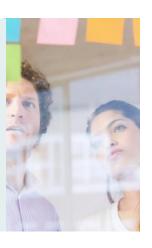
Provide specific branding in the letter or supporting info (e.g. use a wrapper or insert) – note older leavers may not associate with current brand



5

Limit what you ask for

Only ask for what you need to confirm identity e.g. partial NINO will do! (1,5,6,7,8th character)



6

Multiple points of entry

Provide alternative entry points to remove potential barriers (phone, online, email and post).





The Outcome

What was achieved in this example

Member Expectations

90%

settled of the in-scope member population traced

80%

of members accessing portal

97%

Member satisfaction score

Industry Capacity

Hours, not weeks

For transaction times

SLA<1 day

for each stage

<3 days

from start to finish for quickest cases



Combining online / helpline

15 seconds

to answer calls



3

Case Study 2

Driving self-service to solve a capacity crunch

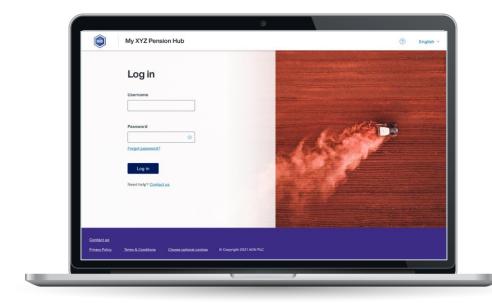


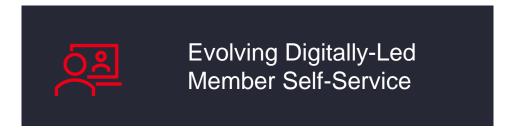
How Can We Use Current Technology More Effectively Today?

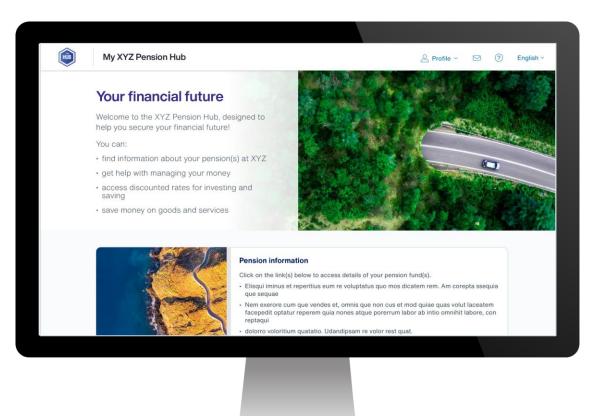


Pensions Hub

One-Stop Shop for Members









Results of implementing self-service

Positives for members and schemes

Impact on transactions going through the team

35%

REDUCTION

Reduction in overall administration team transactions in 2 years while cases generally have increased

Self-service 24/7

Catering for the curious

- 24/7 access to pension savings information, including access to investment switches within 24 hours for "active" investors
- DB "planners" who typically ask for multiple quotes at once can run these at different ages on their own schedule, at no extra cost to the scheme



Admin team given

Breathing space





Personalised user experience

Allowed for greater member segmentation

- Content tailored for the user based on their own circumstances
- Segmentation around membership e.g. members in multiple sections (DB, CARE, DC)
- Age-specific content e.g. early career/saver, mid-career, close to retirement
- Status-based e.g. pensioners can see payslips



Member feedback

Improved satisfaction



Cost savings

£000s

REDUCTION

Reduction in cases led to almost complete elimination of "excess" transaction fees within 2 years



4

Technology on the horizon

How AI could accelerate change



AI – what do we mean?

UK legal definition

Artificial Intelligence (AI) is technology enabling the programming or training of a device or software to:

- (i) Perceive environments through the use of data;
- (ii) Interpret data using automated processing designed to approximate cognitive abilities;
- (iii) Make recommendations, predictions or decisions; with a view of achieving a specific objective.

Source: As defined in the National Security and Investment Act 2021 (Notifiable Acquisition) (Specification of Qualifying Entities) Regulations 2021



Key takeaway:

There is obvious potential for the use of AI in the pensions industry to help drive change - if it is used in the right way.





AI Opportunities for Pension Schemes

How will the pensions industry develop through the use of AI?

1

Member Engagement and communications



2

Operational efficiencies



3

Governance



4

Strategic thinking



5

Administration and data support



Industry steering group

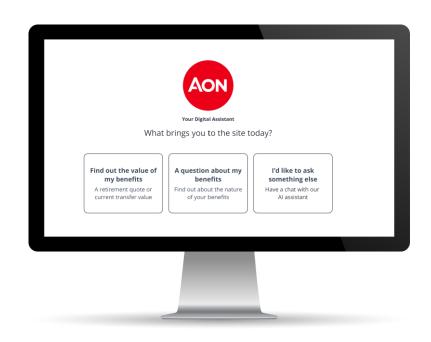
Aon is part of an industry steering group to see risks and opportunities for the pensions industry from Al



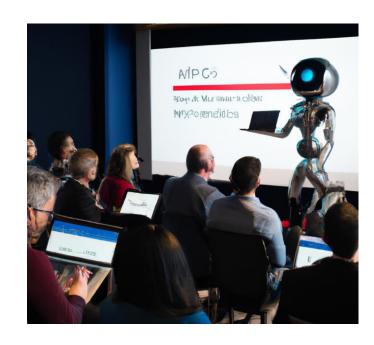
Al – member engagement, communications and experience



Hyper-personalised communications



Enhanced digital offerings e.g. Al chatbot



Future of support – robo "guidance"?



5

The Future

Pensions Industry 2.0?



The Future – Pensions Industry 2.0

What can we expect?





Digital retirement packs will soon be the norm



Dashboards & Al

Tackling future digitalisation head on



Data and Insights

Using data on member behaviours to evolve support further









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Chair's closing comments

Joanne Livingstone, Chair, Firefighters' Pensions (England) Scheme Advisory Board

Thank you for coming and safe travels home







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Firefighters' Pensions Annual Conference

Thursday 19 September 2023 18 Smith Square, London

