



<b>Northamptonshire Local Pension Board (Firefighters' Pension Scheme)</b>	<b>10 September 2018</b>	<b>Conference Room Moulton Logistics Centre Northants Fire &amp; Rescue HQ Moulton Way Northampton NN3 6XJ</b>	<b>2.00pm</b>
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## AGENDA

### \* Papers enclosed

Item No.	Subject	Responsible Officer
1.	Apologies for Absence and Declaration of Interests	Jim Dorrill
2.	Election of Chairman & Vice-Chairman	Paul Hanson
3.*	Minutes from the meeting held on 1 December 2017	Jenny Rendall
4.*	Firefighters' Pension Scheme(s) Administration	Joanne Walton
5.*	Firefighters' Overpayment of Pension Policy	Joanne Walton
6*	Member Training Policy	Joanne Walton
7.*	Local Pension Board Annual Report	Paul Hanson
8.*	Date and Time of Future Meetings	Jenny Daniels

### EXEMPT ITEMS

In respect of the following items the Chairman may move the resolution set out below, on the grounds that if the public were present it would be likely that exempt information (information regarded as private for the purposes of the Local Government Act 1972) would be disclosed to them:

The Committee is requested to resolve: "That under Section 100A of the Local Government Act 1972, the public be excluded from the meeting for the following item(s) of business on the grounds that if the public were present it would be likely that exempt information under Part 1 of Schedule 12A to the Act of the descriptions against each item would be disclosed to them"

**Issued: 31 August 2018**

Jenny Daniels  
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Democratic Support Service  
County Hall  
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**Northamptonshire Fire & Rescue Service  
Local Pension Board  
Meeting held in public in  
The Conference Room, Moulton Logistics Centre, Moulton, Northampton**

**Actions & Summary of Meeting: Friday 1 December 2017**

**Agenda Item No: 2**

**PRESENT:-**

Terry Smith (Employee Representative & Chairman)

Dave Harding Councillor Graham Lawman	Employer Representative Employer Representative	Jim Dorrill	Employee Representative
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Also in attendance (for all or part of the meeting)

Darren Dovey	Chief Fire Officer
Paul Hanson	Democratic Services Manager
Gary McLellan	LGSS Pensions Principal Regulations Officer
Jenny Rendall	Democracy Officer (minutes)
Joanne Walton	LGSS Pensions Governance & Regulations Manager

Item No.	Item	Action to be taken by
10/17	<p><b><u>Apologies for Absence and Declarations of Interest:</u></b></p> <p>There were none.</p> <p>There were no declarations of interest.</p>	Jenny Rendall
11/17	<p><b><u>Minutes of the Meeting held on 21 June 2017:</u></b></p> <p>The Local Pension Board approved the minutes of the meeting held on 16 November 2016 as an accurate record of the meeting subject to the the inclusion of apologies from Councillor Lawman.</p> <p><b>RESOLVED that: the Local Pension Board approved the minutes of the meeting held on 16 November 2016 as an accurate record of the meeting subject to the inclusion of Councillor Lawman’s apologies.</b></p>	Jenny Rendall
12/17	<p><b><u>Northamptonshire Firefighters Pension Scheme(s) Administration:</u></b></p> <p>At the Chairman’s invitation, Pensions Governance &amp; Regulations Manager Joanne Walton introduced this report (copies of which had been previously circulated) highlighting the following:</p> <ul style="list-style-type: none"> <li>• This was a new report. Section 2 covered the area of casework during August to October 2017 which was further detailed in Appendix 1.</li> <li>• Everything had been undertaken in line with the targets but to a low volume.</li> <li>• It did not cover the work undertaken by herself and Gary McLellan.</li> <li>• Sectin 3 was the pension reconciliation which had resulted in 20 over-payments and 59 under-payments. They had been through them all 13 of the over-payments were correct but the Administration was not in line with it.</li> <li>• There were 2 over-payments of £4,010.13 and 5 totalling £15,946.28.</li> <li>• Appendix 2 provided a fuller breakdown of all over and under-payments, 7 of which had been resolved.</li> <li>• There were more under than over-payments but a policy was required for dealing with it.</li> <li>• 53% of the contracting out reconciliation had been completed. ITM was currently on pause because HMRC</li> </ul>	

	<p>were saturated with calls. The Scheme was in a good position and would recommence in February.</p> <ul style="list-style-type: none"> <li>• 53% of the contracting out reconciliation had been completed.</li> </ul> <p>In answer to queries on the report the following was confirmed:</p> <ul style="list-style-type: none"> <li>• Most under-payments had been accrued over time and in the case of £11,000 a long time.</li> <li>• They would have to go back and see how far bar the under-payment accrual had taken and the implications would depend on what part of the pension was over/under-paid.</li> <li>• When they wrote to state there had been an under-payment they provided all of the information so that tax was not due.</li> <li>• Some guidance was understood to be coming out as the Fire Brigade wanted some central information.</li> <li>• Officers wished to start on 1 January 2018 on the under-payments and then hopefully guidance would have been received by the time they reached the over-payments.</li> <li>• Officers could appeal.</li> <li>• The Pensions Regulator would take a dim view if the opting out reconciliation was not done.</li> </ul> <p><b>RESOLVED that: the Local Pension Board (Firefighters' Scheme noted the update.</b></p>	<p><b>Joanne Walton</b></p>
<p>13/17</p>	<p><b><u>Northamptonshire Firefighters' Pension Scheme(s) Draft Risk Register:</u></b></p> <p>At the Chairman's invitation, LGSS Pensions Governance &amp; Regulations Manager, Joanne Walton introduced this report (copies of which had been previously circulated) stating they had considered what other fire authorities did in respect of this and feel it was pitched at the right level. Those parts in italics were areas the Fire Services should score.</p> <p>In answer to queries on the report the following was confirmed:</p> <ul style="list-style-type: none"> <li>• The Pensions Regulator would take a bad view if the Fire Service was not seen to do it.</li> <li>• There was no Service Level Agreement with the Fire Service for providing the support but in future there should be. It would also answer quite a few of the questions.</li> </ul> <p>It was agreed that members of the Local Pension Board would take this away and consider it further. The appropriate administrator would organise a time when they could all get together before it was sent back to the Pensions Team.</p>	<p><b>Darren Dovey</b></p>

	<p><b>RESOLVED that: The Local Pension Board would consider the risk register and return a completed version to the Pensions Team.</b></p>	<p><b>Dave Harding Jim Dorrill Terry Smith Joanne Walton</b></p>
<p>14/17</p>	<p><b><u>Northamptonshire Firefighters' Pension Schemes and Firefighters' Compensation Scheme Internal Dispute Resolution Procedures Policy:</u></b></p> <p>At the Chairman's invitation, LGSS Pensions Principal Regulations Officer, Gary McLellan introduced this report (copies of which had been previously circulated) highlighting the following:</p> <ul style="list-style-type: none"> <li>• The Internal Dispute Resolution Procedures (IDRP) were putting something in place for the 1992 scheme.</li> <li>• The wording for all schemes had been reviewed and there were subtle differences across all of them.</li> <li>• Stage 2 had been discussed and it had been suggested that elected members did not take part. A circular issued in 2009 which was agreed by the national committee was that it was followed with elected members. This might be reviewed by the Home office so until that time it was suggested the IDRP was followed as much as possible with the circular of 2009.</li> <li>• The legislation which stated 28 days was different to the circular issue in 2009 which stated 6 months. They had prepared a draft documentation with a 2 page explanation of the process and full guidelines with the application forms. It did state elected members but the Local Pension Board would need to confirm.</li> </ul> <p>In answer to queries on the report the following was confirmed:</p> <ul style="list-style-type: none"> <li>• This was a compliance issue so it was required.</li> <li>• They could proceed on an ad-hoc basis by requesting member involvement via the Democratic Services Manager.</li> <li>• All 3 pension schemes were consistent with the 28 days and this would be followed as it could not be over-ridden by the circular.</li> </ul> <p><b>RESOLVED that: the Local Pension Board (Firefighters Scheme):</b></p> <ol style="list-style-type: none"> <li>1) <b>Confirmed that any stage 2 applications would be heard by a Panel of 3 elected members arranged via a request to the Democratic Services Manager; and</b></li> <li>2) <b>To approve the draft internal dispute resolution procedures subject to the above amendment.</b></li> </ol>	<p><b>Paul Hanson Joanne Walton</b></p>

15/17	<p><b><u>Any Other Business:</u></b></p> <p>The Chief Fire Officer, Darren Dovey brought up the issue of letters that had been issued to members if they had exceeded savings. The LGSS Pensions Principal Regulations Officer, Gary McLellan confirmed it would be best to refer people to them and then they could ascertain if someone had exceeded tax liability. They could not work it out for them could advise them if they thought they could. It was up to the individual to file tax returns if they needed to and they should seek independent financial advice.</p> <p><b>RESOLVED that: Individuals would be referred to the LGSS Pensions Service if they had a query regarding exceeded their savings limit who could then tell them if they thought they required independent financial advice.</b></p>	Gary McLellan
16/07	<p><b><u>Date and Time of Next Meeting:</u></b></p> <p>Friday 13 April 2018 at 2pm.</p>	Jenny Rendall

There being no further business the meeting closed at 3.40pm.  
Jenny Rendall, Democracy Officer

**NORTHAMPTONSHIRE  
FIREFIGHTERS'  
PENSION SCHEME**



**LOCAL PENSION BOARD**

**10 September 2018**

**Report by: THE HEAD OF PENSIONS**

<b>Subject:</b>	<b>Firefighters' Pension Scheme(s) Administration</b>
<b>Purpose of the Report</b>	To present members of the Local Pension Board with information on the administration of the Firefighters' Pension Scheme(s) by LGSS Pensions
<b>Recommendations</b>	<b>That the Local Pension Board notes the content of the report.</b>
<b>Enquiries to:</b>	Name: Jo Walton – Governance and Regulations Manager E-mail: <a href="mailto:jwalton@northamptonshire.gov.uk">jwalton@northamptonshire.gov.uk</a>

**1. Background**

1.1 One of the core functions of the Local Pension Board is to ensure the effective and efficient governance and administration of the Scheme. This report demonstrates a number of key areas of administration performance for consideration by the Local Pension Board.

**2. Administration Performance**

2.1 The following key performance indicators represent the regular casework activities that are undertaken by LGSS Pensions in the administration of the Firefighters' Pension Schemes.

- Notify employees retiring from active membership of benefits award
- Notify leavers of deferred benefit entitlement
- Provide transfer in quote to scheme member
- Confirm transfer in payment and benefits credited to scheme member
- Provide a cash equivalent transfer value
- Process transfer out and issue CETV statement
- Provide a divorce quotation
- Obtain details of beneficiaries after advice of death
- Provide an estimate of benefits
- Calculate cost of purchasing additional pension and notify scheme member

- 2.2 All of the key performance indicators have a target of 10 working days for completion.
- 2.3 For the months November 2017 to June 2018 all targets were achieved and further details can be found in appendix one to this report. The months where there are no statistics represent no activity in the particular area of measured casework.

### 3. Pensioner payroll reconciliation

- 3.1 It was reported at the June 2017 meeting of the Local Pension Board that LGSS Pensions were undertaking a reconciliation of pension administration records compared with the pensioner payroll records in order to demonstrate data quality to comply with prevailing regulations on data held.
- 3.2 An analysis of the pensioner administration system pension in payment compared with the pension physically in payment on the pensioner payroll was carried out with the potential variances above £100 per annum identified as detailed in the table below.

Potential Over/Underpayments	Number to be investigated
Overpayments £100+ pa	20
Underpayments £100+ pa	54
<b>Total potential over/underpayments</b>	<b>74 / 372 records in scope</b>

- 3.3 These variances were investigated and the findings that resulted in an under or overpayment of a pension were as follows:

Type	No.	Amount	Reason for error	Further action
<b>Overpayment</b>	4	£4.46 £2.12 £2.21 £4,005.67 <b>£4,014.46</b>	GMP application GMP application Age adjustment PI application	Written off Written off Written off Scheme Manager decision
<b>Underpayment</b>	17	£1,598.28 £4,765.06 £7,867.02 £443.27 £651.15 £116.28 £624.85 £73.45 £11,321.52 £3,922.57 £8,670.14 £3,385.92 £3,292.44 £2,131.90 £3,283.22 £1,292.69 £1,713.08 <b>£55,552.10</b>	PI application PI application PI application PI application PI application PI application PI application PI application PI application PI application PI application PI application PI application PI application PI application PI application GMP application	Paid to member in January or February 2018
<b>Total:</b>				



- 3.5 There are 5 cases that require further investigation due to their complex nature. These cases will be investigated by 31 December 2018. Full details of these cases will be reported to the Local Pension Board at the next available meeting.
- 3.6 There is one case requiring resolution which is an overpayment of £4,005.67. LGSS Pensions have drafted an overpayments of pension policy which provides guidance on the appropriateness of either writing off or attempting recovery of overpayments. Ultimately, it is for the scheme manager to approve the policy and make subsequent decisions on whether an overpayment should be written off or pursued for repayment. The policy will be presented to the Local Pension Board at this meeting for comments.

#### 4. Contracting-out reconciliation

- 4.1 It has been reported at previous meetings of the Local Pension Board that LGSS Pensions were undertaking an exercise to reconcile contracted-out details held on pensions administration records compared with that held by HMRC.
- 4.2 All UK pension schemes that were contracted out of the state second pension are advised to reconcile their individual member records with that held by Her Majesty's Revenue and Customs (HMRC) by 31 December 2018 to ensure that schemes hold the correct period and amount of contracting-out liability.
- 4.3 The reconciliation project has been outsourced to ITM Limited (an external data audit company) and the progress on the reconciliation is reported below.

Reconciliation stage	Progress
Baseline (23 June 2017)	33% of the data was correct 67% of the data needed further reconciliation
16 November 2017	53% of the data now correct 47% still to be reconciled
9 July 2018	85% of the data now reconciled 15% still to be reconciled

- 4.4 ITM Limited are continuing to reconcile the data directly with HMRC. This stage of the project was due to complete by 31 December 2017, however, with an increasing number of pension schemes now also trying to reconcile their data, HMRC have become slower at issuing responses to queries.
- 4.5 HMRC have now issued a statement that all pension schemes have until 31 October 2018 to send them first time queries and after that data only ongoing queries may be submitted. The HMRC reconciliation service will close to all queries on 31 December 2018. ITM Limited have confirmed that these deadlines will be met.
- 4.6 The next stage will be for LGSS Pensions to calculate any over or underpayments that may be due in respect of previously holding an incorrect amount of contracting-out liability for scheme members whose pension is already in payment.

- 4.7 As with the project to reconcile the pensions administration system with the pensioner payroll, the scheme manager will decide whether any overpayments of pension should be managed in line with the overpayments of pension policy.
- 4.8 The Local Pension Board will receive regular updates on how this reconciliation project is progressing.

## 5. Finance & Resources Implications

- 5.1 The cost of using external support to complete the contracting-out reconciliation is included in the annual recharge.

## 6. Risk Implications

a) Risk(s) associated with the proposal

Risk	Mitigation	Residual Risk
There are no risks associated with ensuring that records held on members of the Firefighters' Pension Schemes are accurate	N/A	Green

b) Risk(s) associated with not undertaking the proposal

Risk	Risk Rating
Failure to ensure the records held on members of the Firefighters' Pension Scheme are accurate would be a breach of the law.	Red

## 7. Communication Implications

<b>Direct communications</b>	Members affected by an overpayment of pension will be managed in line with the policy detailed in section 3.6 and 4.9 of this report.
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## 8. Legal Implications

- 8.1 Failing to comply with the legislation detailed in section 1 of this report is a breach of the law, reportable to the Pensions Regulator.

## 9. Consultation with Key Advisers

- 9.1 LGSS Pensions have consulted with ITM Limited regarding the contracting-out reconciliation.

## 10. Alternative Options Considered

- 10.1 There are no alternative options to be considered.

## 11. Background Papers

- 11.1 Not applicable

## 12. Appendices

### Appendix 1 - Northamptonshire Fire and Rescue Service Performance Monitoring

<b>Checklist of Key Approvals</b>	
Has this report been cleared by Head of Pensions?	Mark Whitby – 14/08/2018

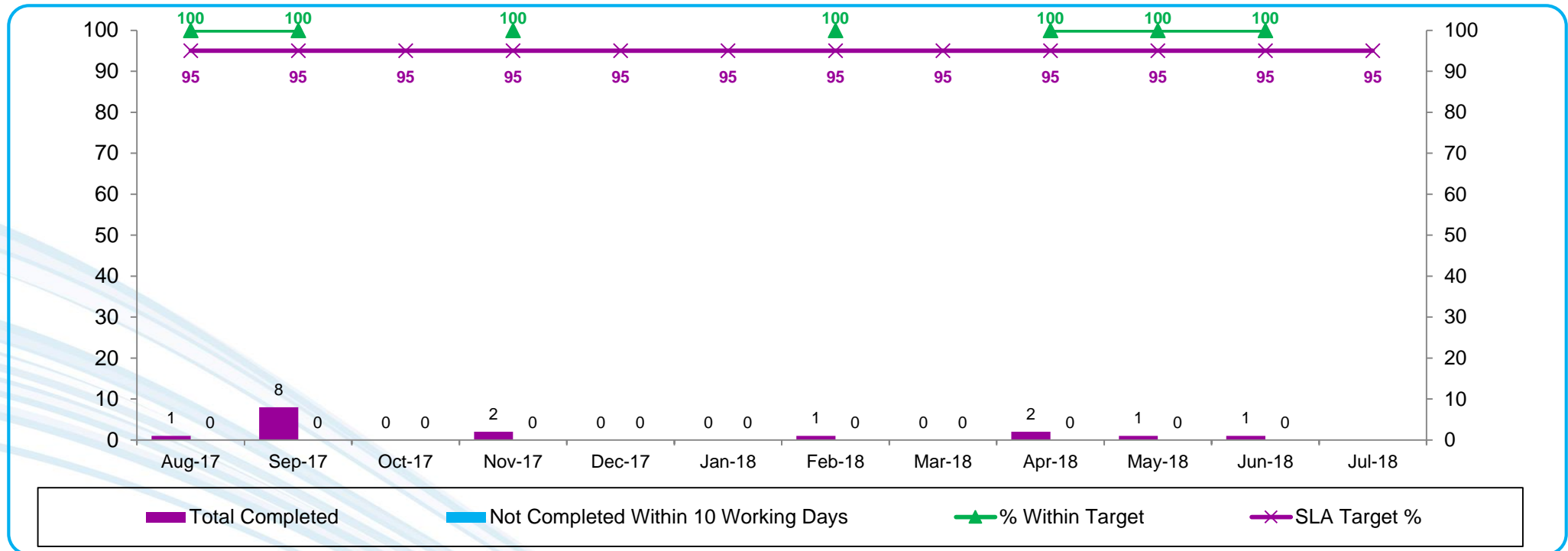


# **Northamptonshire Fire and Rescue Service Performance Monitoring June 2018**

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### SLA Target - Notify employees retiring from active membership of benefits award



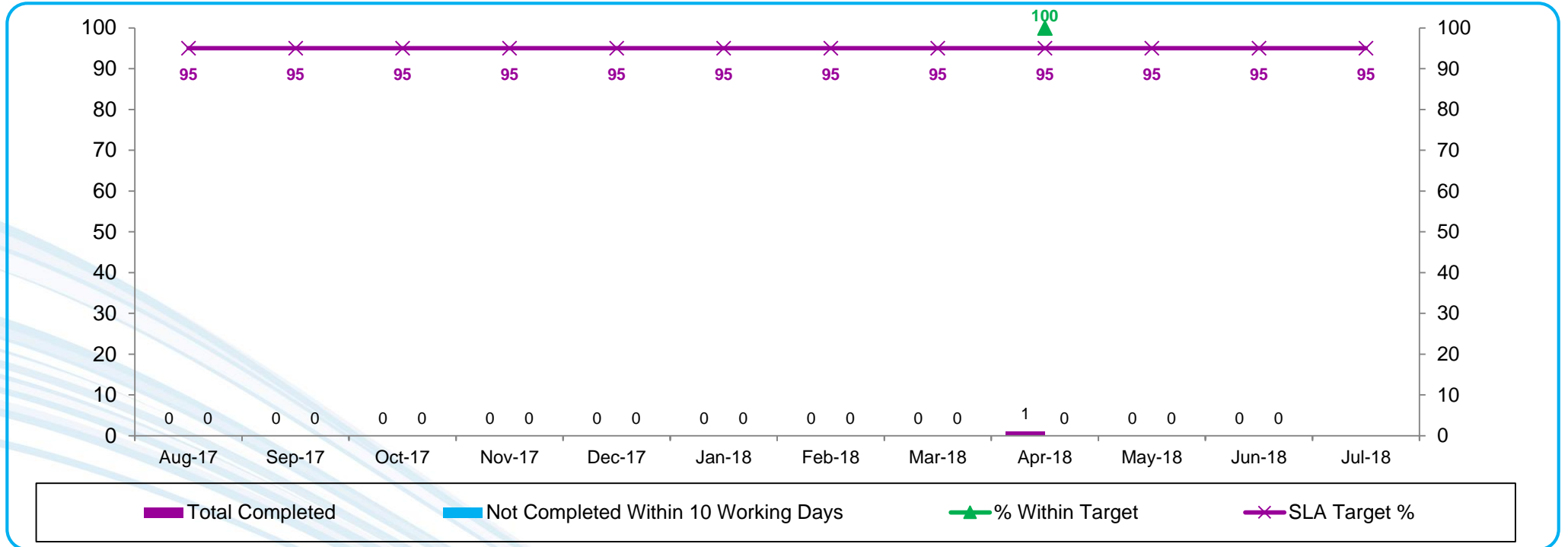
- This chart shows the number of cases and time period for notifying employees retiring from active membership of benefits award, from date of receiving all necessary information, based on the SLA target.

### SLA Target - Notify leavers of deferred benefit entitlement



- This chart shows the number of cases and time period for notifying leavers of deferred benefit entitlement from receipt of all information, based on the SLA target.

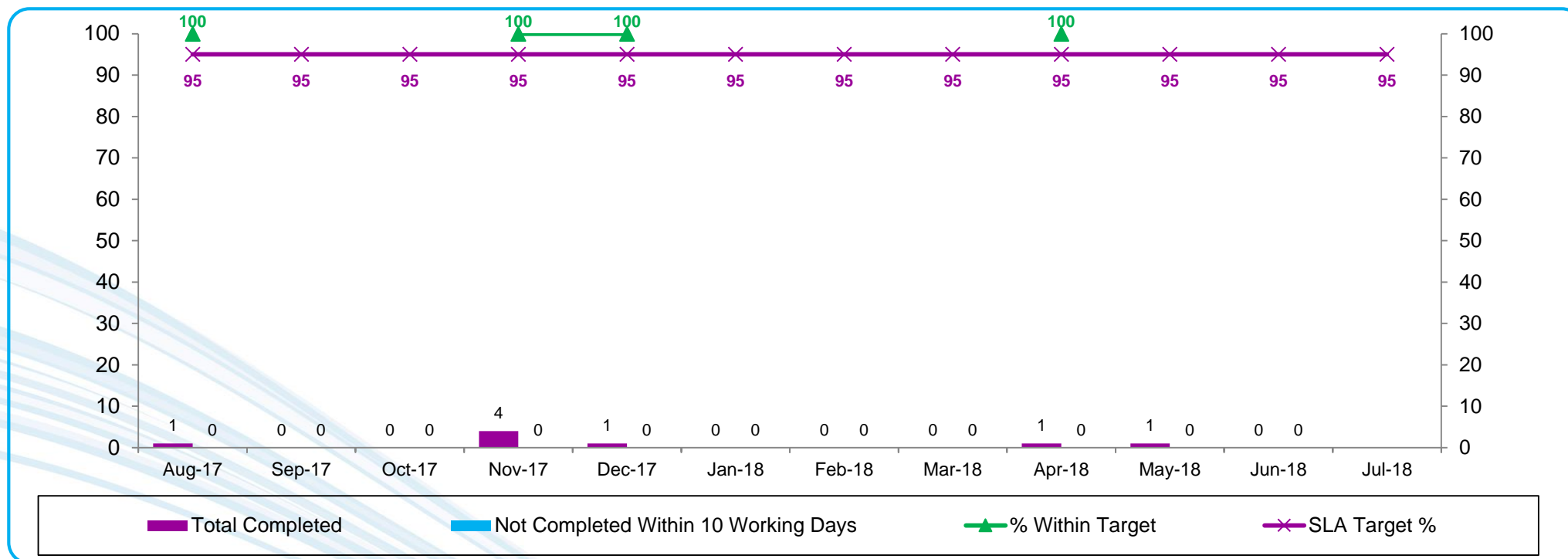
### SLA Target – Provide transfer in quote to scheme member



- This chart shows the number of cases and time period for issuing a transfer-in quote letter from receipt of all appropriate information, based on the SLA target.

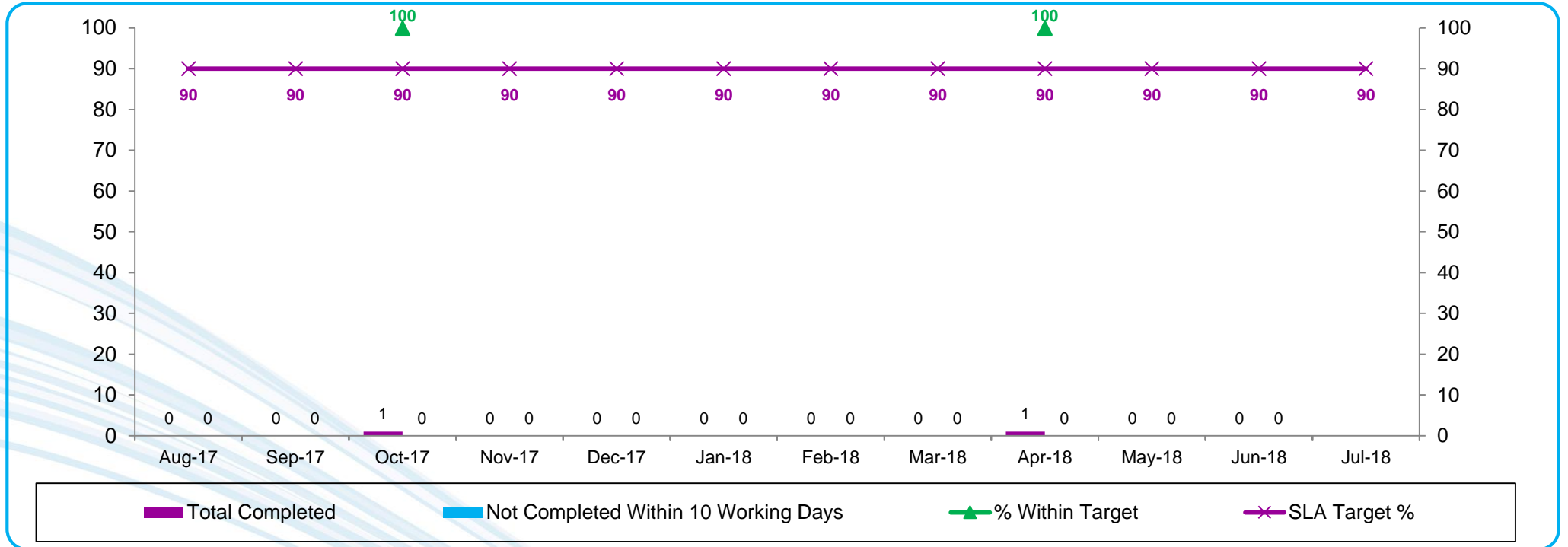


## SLA Target – Confirm transfer in payment and benefits credited to scheme member



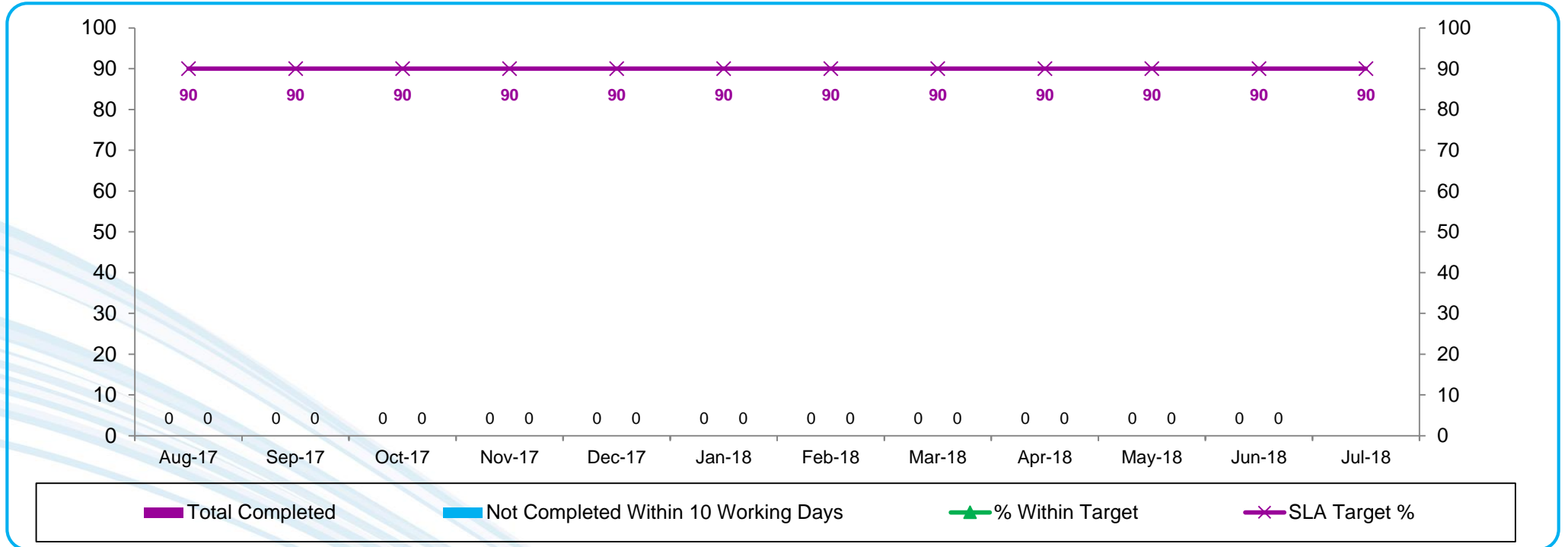
- This chart shows the number of cases and time period for confirming transfer in payment and benefits credited from receipt of all appropriate information, based on the SLA target.

### SLA Target – Provide a cash equivalent transfer value – CETV



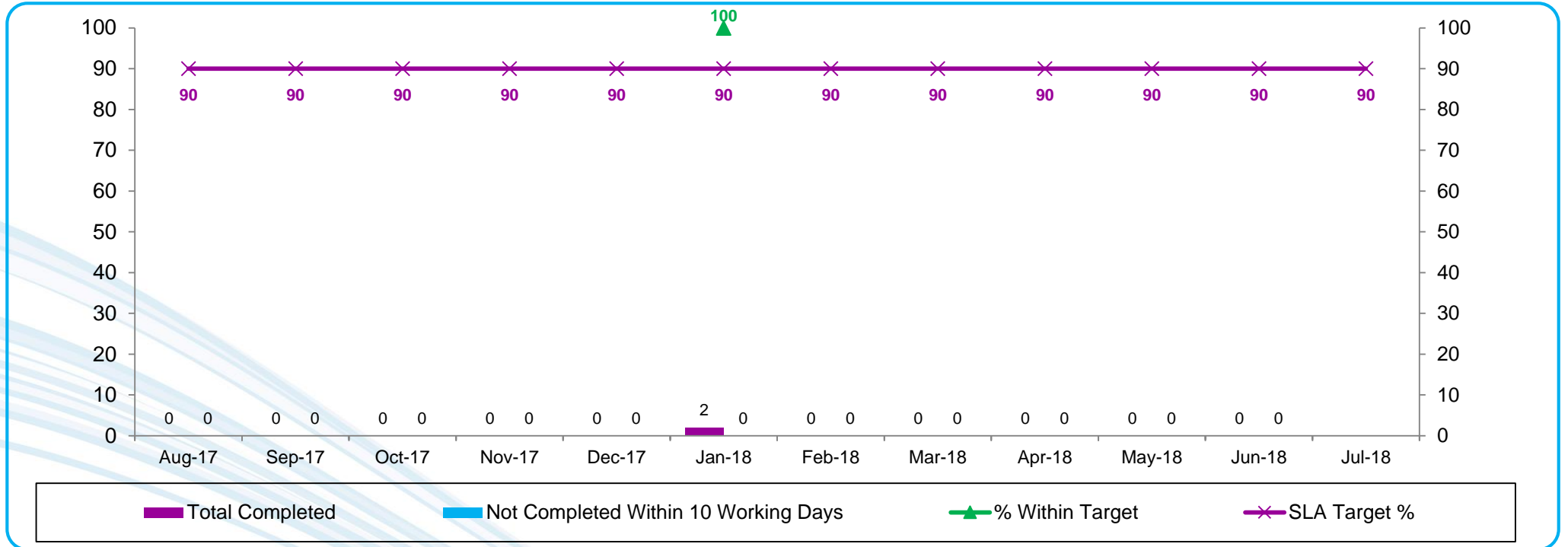
- This chart shows the number of cases and time period for issuing a CETV from receipt of all appropriate information, based on the SLA target.

### SLA Target – Process transfer out and issue CETV statement



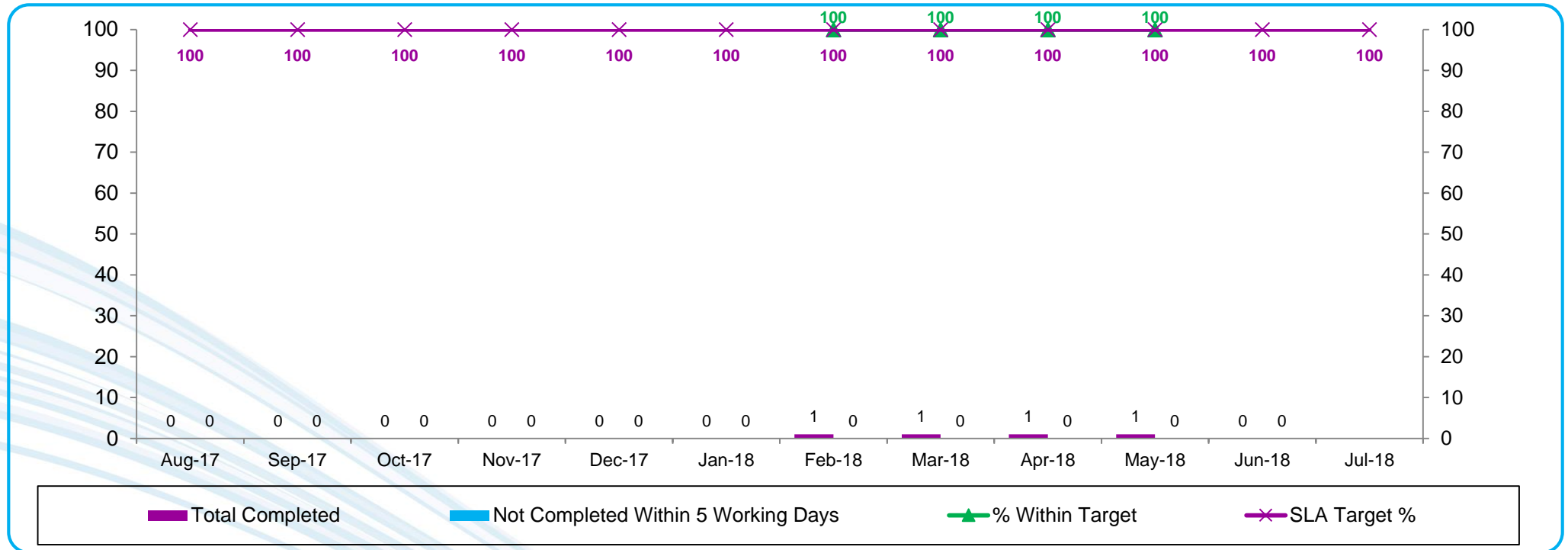
- This chart shows the number of cases and time period for processing transfer out payments from the receipt of all information needed to calculate the CETV, based on the SLA target.

### SLA Target – Provide a divorce quotation



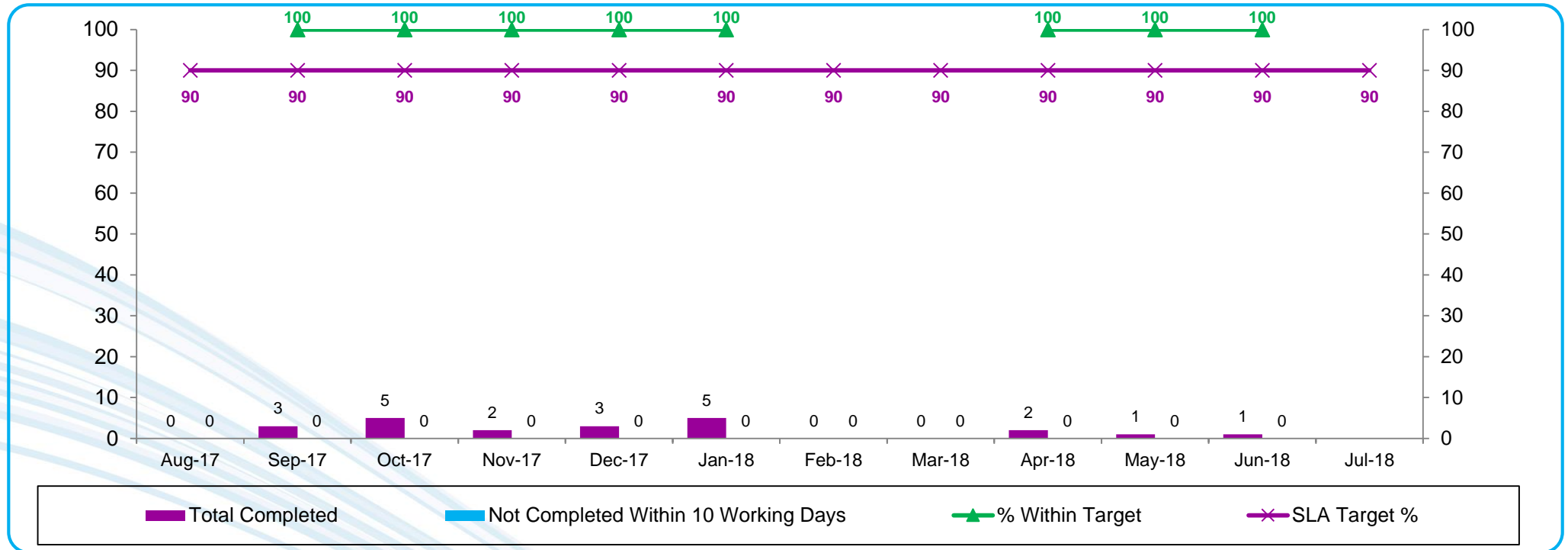
- This chart shows the number of cases and time period for providing a divorce quotation from receipt of all information, based on the SLA target.

### SLA Target – Obtain details of beneficiaries after advice of death



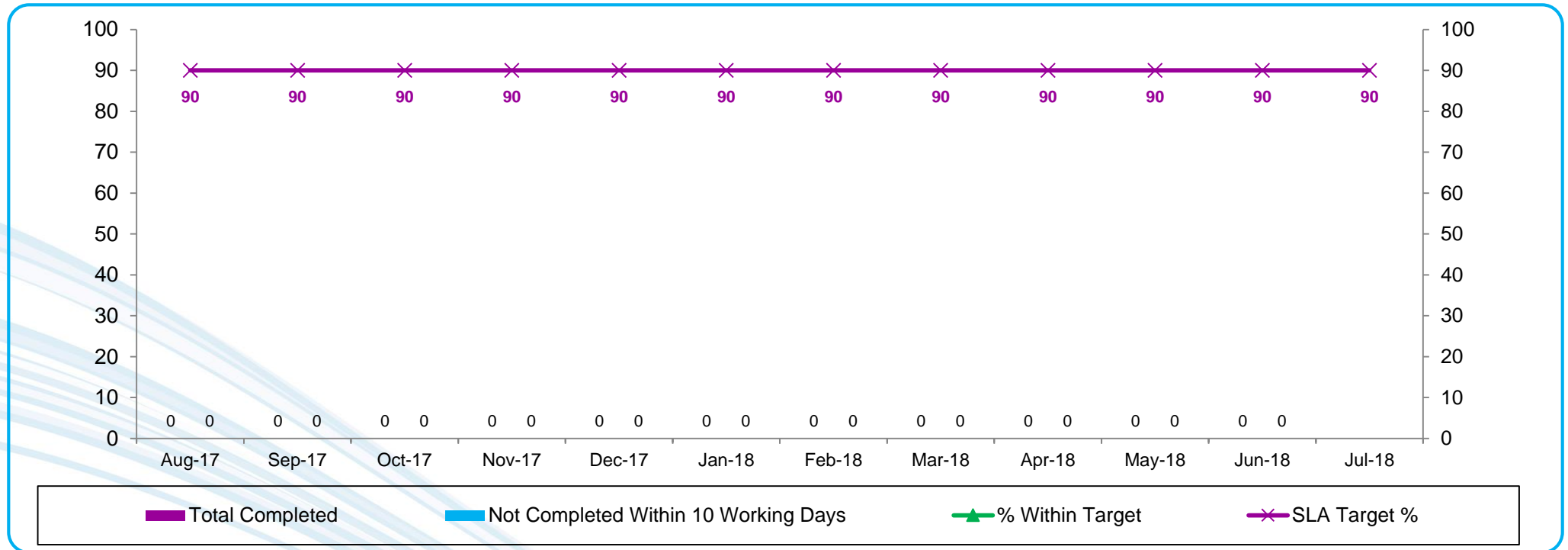
- This chart shows the number of cases and time period for obtaining details of beneficiaries, based on the SLA target.

### SLA Target – Provide an estimate of benefits



- This chart shows the number of cases and time period for issuing an estimate of benefits from receipt of all appropriate information, based on the SLA target.

### SLA Target – Calculate cost of purchasing additional pension and notify scheme member



- This chart shows the number of cases and time period for notifying member of cost of buying additional pension from receipt of request, based on the SLA target.



**NORTHAMPTONSHIRE  
FIREFIGHTERS'  
PENSION SCHEME**



**LOCAL PENSION BOARD**

**10 September 2018**

**Report by: THE HEAD OF PENSIONS**

<b>Subject:</b>	<b>Firefighters' Overpayment of Pension Policy</b>
<b>Purpose of the Report</b>	That the Local Pension Board reviews the policy for appropriateness and suitability prior to final approval by the Scheme Manager.
<b>Recommendations</b>	<b>That the Board reviews the Overpayment of Pension Policy and provides feedback where necessary.</b>
<b>Enquiries to:</b>	Name – Jo Walton, LGSS Pensions Governance and Regulations Manager E-mail – <a href="mailto:jwalton@northamptonshire.gov.uk">jwalton@northamptonshire.gov.uk</a>

**1. Background**

- 1.1 It is important for the Scheme Manager of the Northamptonshire Firefighters' Pension Scheme to have a policy on how overpayments of pension are managed once identified. Such a policy will provide assurance to the stakeholders that all overpayments are treated in a fair and equitable manner and that the Scheme Manager seeks to recover overpayments and has in place steps to prevent and also investigate potential fraudulent activity to safeguard public money.
- 1.2 An Overpayment of Pension Policy will also strengthen the Scheme Manager's position should a complaint be made using the Internal Dispute Resolution Procedure (IDRP) which if exhausted without resolution, can be referred by the scheme member or their representative to the Pensions Ombudsman. Scheme members can also seek assistance from the Pensions Advisory Service (tPAS) at any stage.
- 1.3 Advice has been sought from the Northamptonshire County Council's legal advisers, Eversheds-Sutherland and benefit and governance consultants, Aon Hewitt, to ensure that the policy is both legally appropriate and practical from a scheme administration perspective.

**2. Next steps**

- 2.1 It is the intention to add to this policy sections on overpayments of retirement grants, death grants and transfer values as well as underpayments of pensions to provide assurance that any incorrect payment has an established process for correction.



2.2 It is anticipated that these additional components to the policy will be presented at the next Local Pension Board meeting.

### 3. Risk Implications

a) Risk(s) associated with the proposal

Risk	Mitigation	Residual Risk
Legislation on the recovery of overpayments could potentially be misinterpreted within the policy.	Legal advice has been sought from Eversheds-Sutherland and administrative advice from Aon Hewitt.	Green

b) Risk(s) associated with not undertaking the proposal

Risk	Risk Rating
Failure to have in place a policy on managing overpayments of pension could result in claims of discrimination if cases are not dealt with equally and with recognition to the prevailing legislation.	Green

### 4. Finance & Resources Implications

4.1 The cost of unrecoverable overpayments of pension will be ultimately met by the respective Firefighters' Pension Scheme.

### 5. Communication Implications

<b>Website</b>	The policy, once approved by the Local Pension Board, will be made publically available on the LGSS Pensions website.
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### 6. Legal Implications

6.1 Reference must be made to the Limitations Act and previous court cases such as Webber v Department of Education when making a claim for the repayment of overpaid pensions.

### 7. Consultation with Key Advisers

7.1 Legal advice was obtained from Eversheds-Sutherland and administrative advice from Aon Hewitt.

### 8. Alternative Options Considered

8.1 There are no alternative options to be considered.

### 9. Background Papers

9.1 LGPC information note on pensioner overpayments  
<http://lgpslibrary.org/assets/gas/ew/COoverv1.0.pdf>

## 10. Appendices

### Appendix 1 Overpayment of Pension Policy (2018)

<b>Checklist of Key Approvals</b>	
Has this report been cleared by Head of Pensions?	Mark Whitby – 14/08/2018



# Overpayment of Pension Policy

## 2018

**NORTHAMPTONSHIRE FIREFIGHTERS' PENSION  
SCHEME(S)**

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### 1. Introduction

- 1.1 This is the Overpayment of Pension Policy for Northamptonshire Firefighters' Pension Scheme(s), which are managed by Northamptonshire County Council (the Scheme Manager).
- 1.2 LGSS Pensions, a joint partnership of Cambridgeshire County Council, Northamptonshire County Council and Milton Keynes Council, are the administrators of the Northamptonshire Firefighters' Pension Scheme(s).
- 1.3 Overpayments of pension can occur for a variety of reasons. It is important that the scheme has a clear policy on how overpayments of pension are managed once they are identified.
- 1.4 The Scheme Manager recognises the need to take a pro-active approach to identifying potential fraudulent activity and overpayments.

### 2. Purpose of the policy

- 2.1 The policy is designed to provide assurance to stakeholders that:
  - all overpayments are treated in a fair and equitable manner;

- the Scheme Manager will seek to recover overpayments that have occurred but acknowledges that there may be legal reasons and/or other circumstances which mean that an overpayment may not, in practice, be able to be recovered (in whole or in part); and
- there are steps in place to prevent, and also investigate, potential fraudulent activity.

### **3. Effective date and reviews**

- 3.1 This policy was reviewed as appropriate by the Local Pension Board on xx. The Scheme Manager approved this policy on XX. The policy came into force on xx.
- 3.2 This policy will be reviewed annually and, if necessary more frequently, to ensure it remains robust and relevant.

### **4. Scope**

- 4.1 The policy applies in relation to payments made under the following legislation as it applies following amendment from time to time:
- the Firemen's Pension Scheme Order 1992,
  - the Firefighters' Pension Scheme (England) Order 2006,
  - the Firefighters' Pension Scheme (England) Regulations 2014 and
  - the Firefighters' Compensation Scheme (England) Order 2006.
- 4.2 It applies to:
- All Scheme(s) members, which in this policy includes former members, survivor members and pension credit members of the Northamptonshire Firefighters' Pension Scheme(s) who have received one or more payments;
  - Those former firefighters that were not pension scheme members but have received one or more payment under the Injury Award provisions of the Firemen's Pension Scheme Order 1992 or the Firefighters' Compensation Scheme (England) Order 2006.
  - Executors of the Estates of deceased scheme members and former firefighters with an injury award.
  - Beneficiaries of the schemes' members and former firefighters with an injury award where those beneficiaries have received one or more payments.
  - The Scheme Manager
  - Administrators of the scheme; and
  - The Local Pension Board

### **5. Managing overpayments of pension on death**

- 5.1 Certain pension payments are paid monthly in advance; in the month that someone in receipt of such a pension dies, the part of such a month's payment in respect of the period from date of death to the end of that month is **not** an overpayment and would not therefore be recovered.
- 5.2 Understandably, notification of a death of a someone in receipt of a pension does not always happen immediately and should an overpayment occur, the Scheme Manager will generally seek to recover overpayments that are greater than £250.00 (gross) in value

unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 (gross) or less in the instance of the death of a pensioner has been deemed by the Scheme Manager as uneconomical to pursue.

5.3 All correspondence regarding an overpayment will be handled sensitively due to the circumstances surrounding how the overpayment occurred.

5.4 An invoice will be raised by LGSS Pensions to recover an overpayment which is greater than £250.00 (gross) upon the death of a scheme member.

## **6. Managing overpayments of children's pensions failing to reduce or cease at the appropriate time**

6.1 The legislation governing the Firefighters Pension Schemes (1992,2006 & 2015) and Firefighters' Compensation Scheme sets out certain circumstances when a child's pension would be required to reduce or cease.

6.2 In these cases the individual in receipt of the pension is responsible for informing LGSS Pensions of a change in circumstances to ensure the pension is ceased at the appropriate time, failure to do so would result in an overpayment.

6.3 Should an overpayment of pension occur as a result of late notification of change of circumstances, the Scheme Manager will generally seek to recover overpayments that are greater than £250.00 (gross) in value unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 (gross) or less has been deemed by the Scheme Manager as uneconomical to pursue.

6.4 An invoice will be raised by the LGSS Pensions to recover the overpayment which is greater than £250.00 (gross) as a result of the late notification of the change in circumstances. The invoice will be sent to the individual whose bank account the child's pension was being paid into.

## **7. Managing overpayments of pension following incorrect information supplied by the Northamptonshire Fire and Rescue Service in respect of the scheme member**

7.1 Should an overpayment of pension occur as a result of inaccurate information provided by the Fire and Rescue Service on retirement, review or death of a scheme member, LGSS Pensions will generally seek to recover monies that are greater than £250.00 (gross) in value unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 (gross) or less has been deemed by the Scheme Manager uneconomical to pursue due to the administrative time involved.

7.2 Where practical, overpayments that are greater than £250.00 (gross) in value will be recovered through the scheme member's ongoing pension as this allows for the appropriate adjustment for tax. The pension will be reduced to the correct level for the next available monthly pension payment after a 6 week notice period. The scheme member will be notified in writing of the error and the course of action to be taken.

7.3 Where there is no ongoing pension from which to deduct the overpaid amount, or recovery from the ongoing pension is impractical due to size or duration of the recovery required, an invoice will be arranged by LGSS Pensions to recover the overpayment which is greater than £250.00 (gross) in value.

**8. Managing overpayments of pension as a result of the incorrect rate of pension paid by LGSS Pensions and the member could reasonably have been expected to be aware of the overpayment.**

8.1 There are a number of reasons why a pension could be paid at an incorrect higher rate. The most common reasons are detailed in the table below but it should be noted that this is not an exhaustive list.

	<b>Type of overpayment</b>	<b>How overpayment has occurred</b>
1	Administration error upon creation of payroll record	Incorrect (overstated) rate of pension input onto payroll record but member informed in writing of the correct rate of pension to be paid.
2	Re-employment where abatement affects rate of pension due	Re-employment not notified and within the terms of the Scheme Manager's policy on the exercise of their discretion relating to abatement, the member's annual pension should have been reduced or suspended due to the level of earnings in the new employment. Identified through NFI exercise or other means.
3	Entitlement to pension ceasing	Non notification that a child's pension is no longer payable as the child has ceased full-time education and is in paid employment, has married or entered into a civil partnership, is aged 18 or above and is no longer in full time education or attending a course of at least a year's duration, or has attained the age of 23.
4	Entitlement to current rate of pension ceasing	A Pension Sharing Order or Earmarking Order being received after the implementation date meaning that the pension has been overpaid since that implementation date.
5	Failure to action an alteration to the payroll record/reduction in pension	Failing to implement the change from the higher short term dependants pension to the lower long term rate.
6	Failure to action an alteration to the payroll record/reduction in pension	Failing to implement a reduction to a pension as a result of National Insurance Modification (at State Pension Age for those members who had membership before 1 April 1980).

8.2 If the scheme member has been notified of the correct rate of pension in writing and is receiving a higher amount, it can be said that the member can reasonably be aware that they are being overpaid as the scheme member has been notified of the correct rate in writing.

8.3 The Scheme Manager will therefore generally seek to recover monies that are greater than £250.00 (gross) in value unless there are legal reasons and/or other circumstances which



mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 (gross) or less has been deemed as uneconomical to pursue due to the administrative time involved.

8.4 Where practical, the amount will be recovered from the scheme member's ongoing pension as this allows for the appropriate adjustment for tax. The pension will also be reduced to the correct level for the next available monthly pension payment after a 6 week notice period and will be notified in writing of the error and the course of action to be taken.

8.5 Where there is no ongoing pension from which to deduct the overpaid amount, or recovery from the ongoing pension is impractical due to size or duration of the recovery required, an invoice will be arranged by the LGSS Pensions to recover the overpayment which is greater than £250.00 in value.

**9. Managing overpayments of pension following an incorrect rate of pension being paid by the LGSS Pensions and it can be said that the member cannot have known of the overpayment**

9.1 The table below illustrates how an overpayment of a member's pension can occur without the member being aware. It should be noted that the table below is not an exhaustive list;

	<b>Type of overpayment</b>	<b>How overpayment has occurred</b>
1	Administration error upon calculation and notification of benefit entitlement (includes dependants' pensions)	Incorrect (overstated) rate of pension input onto payroll record and member informed in writing of the, incorrect, rate of pension to be paid.
2	Incorrect level of Guaranteed Minimum Pension (GMP) being paid	New information from HMRC leads to a revised rate of GMP to be used which, due to the different way cost of living increases are applied to GMP and the excess over GMP, means that, overall, a lower level of pensions increase should have been paid.
3	Pensions Increase	Pensions Increase inaccurately applied to the elements of a pension in payment.

9.2 In these circumstances the Scheme Manager will generally seek to recover monies that are greater than £250.00 (gross) in value unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 (gross) or less has been deemed as uneconomical to pursue due to the administrative time involved.

9.3 Where practical, the amount will be recovered from the scheme member's ongoing pension as this allows for the appropriate adjustment for tax. The pension will also be reduced to the correct level for the next available monthly pension payment after a 6 week notice period. The scheme member will be notified in writing of the error and the course of action to be taken.

9.4 Where there is no ongoing pension from which to deduct the overpaid amount, or recovery from the ongoing pension is impractical due to size or duration of the recovery required, an invoice will be arranged by LGSS Pensions to recover the overpayment which is greater than £250.00 (gross) in value.

## **10. Discretion to write off overpayments**

- 10.1 For all scenarios mentioned above, the Scheme Manager has the ability to exercise discretion in the event of legal reasons and/or exceptional circumstances and to ensure no individual is unfairly treated. If pursuing recovery of an overpayment was to cause significant distress and/or if there are legal reasons as to why the overpayment may not be recovered (in whole or in part) this would be taken into account as would the cost effectiveness of recovery. All applications made to write off of an overpayment will be investigated on a case by case basis and final decision will be made by the Scheme Manager.
- 10.2 The Scheme Manager has discretion to write off any amount under £250.00 (gross) in line with HM Revenue and Customs authorised payments limits and the analysis of the cost effectiveness of pursuing the claim conducted.

## **11. Recovery**

- 11.1 The Limitation Act 1980 states that "*An action founded on simple contract shall not be brought after the expiration of six years from the date on which the cause of action accrued*". However, section 32(1) of the Act effectively 'postpones' the date by which a Scheme Manager may make a claim to recover monies in certain circumstances. It states "*the period of limitation shall not begin to run until the plaintiff has discovered the fraud, concealment or mistake (as the case may be) or could with reasonable diligence have discovered it*". The potential effect of section 32(1) in relation to any overpayment and its recovery will be considered on a case-by-case basis.
- 11.2 Therefore the Scheme Manager will generally seek to recover overpayments that have been discovered within the last 6 years with the relevant postponement applied if applicable in line with the Limitation Act unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part).
- 11.3 Examples of limitation periods and how they operate in relation to overpayments are included in appendix 1 of this policy.
- 11.4 It should be borne in mind that where the Scheme Manager seeks to recover overpayments, there may be arguments raised as to why the overpayment should not be recovered (in whole or in part). These will need to be considered on a case-by-case basis and, if successful, may affect the ability to recover the overpayment (in whole or in part).

## **12. Length of time to recover overpayment**

- 12.1 The Scheme Manager will allow a pension overpayment to be recovered over the same amount of time as the overpayment occurred. For example, if overpayments were made for a 3 month period, the recovery period to repay the overpayment will be 3 months. In the event that reasonable arguments are advanced that the recovery period should be extended, the Scheme Manager can at its discretion allow an extension based on the individual's circumstances; such an extension would generally not exceed a further 50% of

the period in which the overpayment occurred with scope for this period to be extended based on the individual's circumstances.

### **13. Claims of inability to repay overpayments**

13.1 In cases where it is claimed that an overpayment cannot be repaid, LGSS Pensions will enter into negotiations with the individual overpaid/their representatives or next of kin and an analysis of the cost effectiveness of pursuing the overpayment will be undertaken on a case-by-case basis. For large overpayments, where appropriate the Scheme Manager will seek legal advice. This approach will reduce the number of Internal Dispute Resolution Procedures applications and referrals to the Pensions Ombudsman. For any cases that do reach the Pensions Ombudsman, the Scheme Manager would have demonstrated engagement and negotiation with the complainant.

### **14. Monitoring repayments**

14.1 In cases where recovery is not being made through the pension payroll and an invoice has been raised, the responsibility for chasing the payment rests with the LGSS Debt Recovery Team. If a final reminder is issued, officers are notified and a decision is made by the Scheme Manager as to whether to take legal action, taking into consideration the amount and circumstances against the potential of legal action.

### **15. Reporting to HM Revenue and Customs and effects on the Authority and individual**

15.1 Scheme Managers are obliged to correct any error they discover within a reasonable period of time. To do otherwise would render payments unauthorised under Section 14 of the Registered Pension Scheme (Authorised Payments) Regulations 2009. HM Revenue and Customs have a clear steer with regards to timing, in so much that "*When a scheme discovers an overpayment it immediately becomes unauthorised and is subject to an unauthorised tax charge*".

15.2 Regulation 13 says that a payment made in error will be an unauthorised payment if the:

- Payment was genuinely intended to represent the pension payable to the person;
- Scheme Manager believed the recipient was entitled to the payment and;
- Scheme Manager believed the recipient was entitled to the amount of pension that was paid in error.

15.3 In addition to the above, there is a further exemption where the overpayment is a 'genuine error' and the aggregate overpayment (paid after 5th April 2006) is less than £250. In such circumstances, if the overpayment is not recovered it remains an unauthorised payment but it does not have to be reported to HM Revenue and Customs and HM Revenue and Customs will not seek to collect tax charges on it.

15.4 Examples of HM Revenue and Customs 'genuine errors' are in appendix 2 of this policy.

15.5 The Finance Act 2004 also sets out a list of the payments which a registered pension scheme is authorised to make to members. Payments which do not fall within the list will

become unauthorised payments and could result in up to three tax charges applying: 1) an authorised payments charge on the recipient of the payment; 2) an unauthorised payments surcharge on that recipient; and 3) a scheme sanction charge on the scheme.

- 15.6 Payments made in the period between notifying the member of an overpayment and the point at which the correction to the right level of pension is made will be regarded under the above legislation as an unauthorised payment. If the total amount of pension paid at the incorrect rate from point of notification to date of reduction to the correct rate is greater than £250 (gross) it would be subject to tax charges 1) and 3) and possibly 2 as set out in section 17.5.

## **16. Prevention**

- 16.1 The Scheme Manager has in place processes in order to minimise the risk of overpayments occurring.
- 16.2 The National Fraud Initiative is conducted every two years; it compares files of pensioners with the Department for Work and Pensions database of the deceased and highlights matches for investigation. The Scheme Manager actively participates in this initiative.
- 16.3 The Scheme Manager participates in overseas life existence checks to ensure only legitimate pensions are being paid and to reduce the likelihood of fraudulent activity.
- 16.4 A report is run periodically on the pension administration system to identify individuals in receipt of a child's pension, further investigations are then carried out for children that are identified as over the age of 18 to ensure they are still entitled to receive a pension.
- 16.5 All correspondence sent to scheme members includes reminders that LGSS Pensions must be advised of changes in circumstances or the death of a scheme member. LGSS Pensions also investigates any returned pensioner payslips and pension payments returned by banks and building societies to ensure the welfare of the scheme member and to protect the scheme.
- 16.6 Officers have a robust system in place for identifying changes to the payroll that need to be processed for a particular payroll month. The process incorporates payroll deadlines and ensures changes are made in a correct and timely manner. This would be in circumstances such as a change from a short term dependant's pension to a long term pension.

## Appendix 1 – Limitation Period Examples

Scenario	Limitation Period	Overpayment Period which can be claimed*
<ul style="list-style-type: none"> <li>• Overpayments began in April 2008 (the first Mistake Date)</li> <li>• Overpayments discovered, or could have been discovered with reasonable due diligence, in August 2010 (the Discovery Date under Section 32 of the Limitation Act 1980)</li> <li>• Overpayments made for period between April 2008 and August 2010</li> <li>• Formal claim** for recovery made in January 2015 (the Cut Off Date as referred to in <i>Webber v Department for Education</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• No issues in principle with the Limitation Period as formal claim for recovery commenced within 6 year period after the Discovery Date</li> <li>• Claims are therefore <u>valid and</u> should proceed</li> </ul>	<ul style="list-style-type: none"> <li>• Overpayments back to when they began in April 2008 until August 2010 may be claimed</li> </ul>
<ul style="list-style-type: none"> <li>• Overpayments began in April 2003 (the first Mistake Date)</li> <li>• Overpayments discovered, or could have been discovered with reasonable due diligence, in November 2009 (the Discovery Date under Section 32 of the Limitation Act 1980)</li> <li>• Overpayments made from April 2003 to November 2009</li> <li>• Formal claim for recovery made in December 2011 (the Cut Off Date as referred to in <i>Webber</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• No issues in principle with the Limitation Period as formal claim for recovery commenced within 6 year period after the Discovery Date</li> <li>• Claims are therefore valid and should proceed</li> </ul>	<ul style="list-style-type: none"> <li>• Overpayments back to when they began in April 2003 until November 2009 may be claimed</li> </ul>
<ul style="list-style-type: none"> <li>• Overpayments began in January 1999 (the first Mistake Date)</li> <li>• Overpayments discovered or could have been discovered with reasonable due diligence in September 2016 (when the date was received from HM Treasury in relation to the GMP equalisation exercise) (the Discovery Date under Section 32 of the Limitation Act 1980)</li> <li>• Overpayments made for the period from January 1999 to September 2016</li> <li>• Formal claim for recovery made in February 2017 (the Cut Off Date as referred to in <i>Webber</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• No issues in principle with the Limitation Period as formal claim for recovery commenced within 6 year period after the Discovery Date</li> <li>• Claims are therefore valid and should proceed</li> </ul>	<ul style="list-style-type: none"> <li>• Overpayments back to when they began in January 1999 until September 2016 may be claimed</li> </ul>
<ul style="list-style-type: none"> <li>• Overpayments began in April 2006 (the first Mistake Date)</li> <li>• Overpayments discovered, or could have been discovered with reasonable due diligence, in August 2009 (the Discovery Date under Section 32 of the Limitation Act 1980)</li> <li>• Overpayments made for period between April 2006 and August</li> </ul>	<ul style="list-style-type: none"> <li>• Issue with the Limitation Period as formal claim for recovery commenced more than 6 years after the Discovery Date</li> <li>• Claims are therefore out of time and should not proceed</li> </ul>	<ul style="list-style-type: none"> <li>• Overpayments cannot be claimed back as the formal claim for recovery was made more than 6 years after the Discovery Date</li> </ul>

<p>2009</p> <ul style="list-style-type: none"> <li>• Formal claim for recovery made in January 2017 (the Cut Off Date as referred to in <i>Webber</i>)</li> </ul>		
<ul style="list-style-type: none"> <li>• Overpayments began in April 2006 (the first Mistake Date)</li> <li>• Overpayments discovered, or could have been discovered with reasonable due diligence, in August 2009 (the Discovery Date under Section 32 of the Limitation Act 1980)</li> <li>• Overpayments made for period between April 2006 and August 2016</li> <li>• Formal claim for recovery made in January 2017 (the Cut Off Date as referred to in <i>Webber</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• Issue with the Limitation Period as formal claim for recovery commenced more than 6 years after the Discovery Date</li> <li>• Claims for overpayments between April 2006 and January 2011 are therefore out of time and <u>should not proceed</u></li> <li>• However, as each monthly overpayment is a separate overpayment, the effect of the <i>Webber</i> case is that overpayments made in the 6 years prior to the Cut Off Date (i.e. the overpayments made in February 2011 to August 2016) can be recovered</li> </ul>	<ul style="list-style-type: none"> <li>• Overpayments for the period April 2006 to January 2011 cannot be claimed back as the formal claim for recovery was made more than 6 years after the Discovery Date</li> <li>• Overpayments for the period February 2011 to August 2016 may be reclaimed.</li> </ul>

\* while this refers to the period which can be claimed, this is not the same as the period which will definitely be recovered in light of the other defences which are available to scheme members who face such claims for repayments of overpayment.

\*\* reference to formal claim in this appendix means the commencement of formal proceedings to recover the overpayment.

## **Appendix 2 - Examples of HM Revenue and Customs 'genuine errors'**

### **Genuine error - example 1**

Apart from the case of pensions continuing under a 'term certain' guarantee, pensions are supposed to stop accruing on the death of the pensioner. If payments that accrued inappropriately after the death continue to be made, they will be unauthorised unless they fall within the limited conditions of regulation 15 of The Registered Pension Schemes (Authorised Payments) Regulations. The main feature of those conditions is that instalments can be paid within 6 months of the member's death providing the payer was reasonably unaware the pensioner had died.

Clearly then, once the 6 month time limit has passed, the tax rules will regard any future instalments as unauthorised member payments, and the fact the payer might remain unaware of the member's death does not change the essential character of any payment made. When the death comes to light the payer can see that the payments made more than 6 months after death were made in error.

### **Genuine error - example 2**

The tax rules normally require that a pension being paid to a dependent who is child of a deceased member must stop when the recipient reaches age 23. If the recipient does not qualify for any of the exceptions that would allow for the continuation of their pension after that time, for example because of a disability, then the payer must make adequate arrangements to stop the pension in time. To this end they may give a clear and timely warning to the bank to stop payments from the necessary date but it can happen that the bank fails to act on those instructions and payments continue to be made in error.

In both of these examples, if the error was spotted and rectified (pension overpayments were repaid) as soon as reasonably possible, the inadvertent pension instalments (in the case of Example 1, only in respect of the instalments paid after the 6 month limit where the conditions otherwise apply) would not be unauthorised member payments.

However, there would be an unauthorised member payment if, despite the error being spotted, it is decided the repayment of the inadvertently overpaid pension instalments will not be pursued or the scheme does attempt recovery (in the case of Example 1, only in respect of the instalments paid after the 6 month limit where the conditions otherwise apply) but is unsuccessful and eventually decides to write off the overpayment (even though the decision might be taken on administration costs grounds or out of sensitivity). The exception to this will be if - as may often be the case - one of the categories of authorised payments introduced by the Registered Pension Schemes (Authorised Payments) Regulations 2009 can then be looked to in relation to payments made in genuine error but left in place.

The date of the unauthorised payment for the purpose of having to make a report of that payment would be the date that the decision is made not to seek recovery of the overpayment or the date the decision is taken to no longer seek recovery of the overpayment, as the case may be.

Where the overpayment is not pursued or, otherwise, not successfully pursued and the total of such overpaid pension instalments paid after 5 April 2006 (overpaid instalments paid before 6 April 2006 do not count for this purpose) to, or in respect of, a particular member does not exceed £250:

- for its own reasons of cost administration, under its Collection and Management powers, HM Revenue & Customs will not seek to collect the tax that, in strictness, is due in respect of the unauthorised payment (although the payment remains an unauthorised payment), and
- the scheme administrator does not have to report the unauthorised payment to HM Revenue & Customs, and
- the unauthorised payment does not have to be returned on the recipient's Self-Assessment tax return or, otherwise, be notified to HM Revenue & Customs.

If the aggregate overpayment exceeds £250, then all of the overpayment is chargeable as an unauthorised payment (i.e. one cannot deduct £250 as if it were an allowance, which it is not).

For this purpose, the £250 threshold applies to the aggregate of the overpayments actually received by, or in respect of, the member.

Where the conditions would otherwise apply in respect of pension instalments paid later than 6 months after the death of a pensioner except that the pension instalments have been paid later than 6 months after the pensioner's death, the £250 threshold applies in respect of the aggregate of the pension instalments paid after the expiry of the 6 month time limit only. The pension instalments paid up to the 6 month time limit would not be.

### **Overpayment of lump sums**

The conditions described above apply equally where an overpayment of a lump sum occurs, such as a pension commencement lump sum or serious ill-health lump sum. So the limit of £250 will apply, but any lump sum in excess of that amount, where recovery cannot be made, will be an unauthorised payment to the extent that the amount is not an authorised payment.

For example, a pension commencement lump sum of £100,000 is due to be paid under the scheme rules, but £105,000 is paid in error. The scheme administrator is unable to affect a recovery of the excess. Under the tax rules, the pension commencement lump sum of £100,000 is the permitted maximum, so the whole excess of £5,000 is an unauthorised payment (i.e. one cannot deduct £250 as if it were an allowance, which it is not).

Note that a payment of a lump that is intended to be a pension commencement lump sum but ends up exceeding the permitted maximum may still be an authorised member payment if certain conditions are met.



## **Example**

A pension commencement lump sum must be paid within an 18 month period starting 6 months before and ending 12 months after the member becomes entitled to the lump sum and linked pension. However, due to an error within the administration department of the pension scheme, the lump sum payment is not made by that deadline. If the lump sum is paid after the deadline it will not be a pension commencement lump sum and (unless it falls within the definition of one of the other authorised lump sums) will be an unauthorised member payment.

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**NORTHAMPTONSHIRE  
FIREFIGHTERS'  
PENSION SCHEME**



**LOCAL PENSION BOARD**

**10 September 2018**

**Report by: THE HEAD OF PENSIONS**

<b>Subject</b>	<b>Member Training Policy</b>
<b>Purpose of the Report</b>	To present to the Local Pension Board the Member Training Policy with a view to it being adopted.
<b>Recommendations</b>	<b>That the Board reviews and approves the Member Training Policy</b>
<b>Enquiries to:</b>	<b>Name – Jo Walton, LGSS Pensions Governance and Regulations Manager jwalton@northamptonshire.gov.uk</b>

**1. Background**

- 1.1 The Member Training Policy is required to assist the Local Pension Board in performing and developing their individual role with the ultimate aim of ensuring that the Northamptonshire Firefighters' Pension Schemes are managed and assisted by individuals who have the appropriate level of knowledge and skills as required by the Public Service Pensions Act 2013.
- 1.2 The proposed policy can be found in appendix 2 of this report.

**2. Legal Requirements**

- 2.1 In accordance with the Public Service Pensions Act 2013, each member of the Local Pension Board (LPB) should have the capacity to become conversant with, and will develop a knowledge and understanding of the rules of the relevant Firefighters' Pension Schemes and the law relating to pensions and such other matters.

**3. The Pensions Regulator Code of Practice**

- 3.1 The Pensions Regulator's statutory objectives include protecting the benefits of pension scheme members and promoting the good administration of work-based pension schemes.
- 3.2 The Pensions Regulator has a number of regulatory tools, including issuing codes of practice, to enable it to meet its objectives. The code of practice number 14 (governance and administration of public service pension schemes) is structured as a

reference for scheme managers and pension boards to use to inform their actions in areas such as skills, knowledge and understanding.

3.3 This policy has been written fully incorporating the expectations of the Pensions Regulator in terms of skills, knowledge and understanding as laid out in the code of practice.

#### 4. Knowledge required

4.1 The Local Pension Board are required to attain knowledge in the following areas:

- Legislative framework of Firefighter Pension Scheme(s)
- General applicable pension legislation
- Role and responsibilities of the Local Pension Board
- Role and responsibilities of the Scheme Manager
- Role of advisors and key personnel

4.2 The knowledge required can be obtained through a variety of methods and the policy ensures that key assessment and training is undertaken. These comprise of a training needs analysis, completion of the Pensions Regulator Toolkit and attendance at the Scheme Advisory Board annual training.

4.3 As a guide members are expected to undertake/attend four training items a year.

#### 5. Risk Implications

a) Risk(s) associated with the proposal

Risk	Mitigation	Residual Risk
Insufficient resources being available to deliver or arrange the required training	Officers will monitor these risks and will act accordingly in the best interest of the Pension Scheme in conjunction with the Chairman of the Local Pension Board.	Amber
The quality of advice or training provided is not to an acceptable standard		
Changes in membership potentially diminishing knowledge and understanding		
Poor attendance at training and/or formal meetings resulting in poor standard of knowledge accrual and maintenance of knowledge		

b) Risk(s) associated with not undertaking the proposal

Risk	Risk Rating
If the policy is not approved or enacted non-compliance with the Pension Regulator's Code of Practice and Section 248A of The Pensions Act 2004 may result.	Green

**6. Finance & Resources Implications**

6.1 Consideration will be given to various training resources available in delivering required training to Members of the Local Pension Board and in the most efficient manner.

**7. Communication Implications**

<b>Website</b>	The policy, once approved by the Local Pension Board, will be made publically available on the LGSS Pensions website.
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**8. Legal Implications**

8.1 Not applicable.

**9. Consultation with Key Advisers**

9.1 None.

**10. Alternative Options Considered**

10.1 There are no alternative options to be considered.

**11. Background Papers**

11.1 Not applicable

**12. Appendices**

**Appendix 1 – Member Training Policy**

<b>Checklist of Key Approvals</b>	
Has this report been cleared by Head of Pensions?	Mark Whitby – 14/08/2018

# Member Training Policy

## 2018

**NORTHAMPTONSHIRE FIREFIGHTERS' PENSION  
SCHEME(s)**

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### 1. Introduction

- 1.1 This is the Member Training Policy for the Firefighters' Pension Schemes, which is managed by Northamptonshire County Council (the Scheme Manager).
- 1.2 The day to day administration of the Firefighters' Pension Schemes is carried out by LGSS Pensions, a joint partnership of Cambridgeshire County Council, Northamptonshire County Council and Milton Keynes Council.

### 2. Purpose of the Policy

- 2.1 The policy is designed to provide assurance to stakeholders that:
- Ensure the Local Pension Board is constituted by people who have the appropriate knowledge and expertise to assist the Scheme Manager in ensuring the Firefighters' Pension Schemes are being managed and operated in an effective and efficient way;
  - Ensure decisions are robust, are well founded and comply with regulatory requirements or guidance from the Pensions Regulator and the Scheme Advisory Board.

### 3. Effective Dates and Reviews

- 3.1 This policy was approved by the Local Pension Board on XX.
- 3.2 The Local Pension Board will review the training policy on an annual basis.

### 4. Scope

- 4.1 The policy applies to Local Pension Board members and the Scheme Manager.

### 5. Legal Requirements

- 5.1 In accordance with the Public Service Pensions Act 2013, each member of the Local Pension Board (LPB) should have the capacity to become conversant with, and will

develop a knowledge and understanding of the rules of the relevant Firefighters' Pension Schemes and the law relating to pensions and such other matters

## **6. The Pensions Regulator Code of Practice**

- 6.1 The Pensions Regulator's statutory objectives include protecting the benefits of pension scheme members and promoting the good administration of work-based pension schemes.
- 6.2 The Pensions Regulator has a number of regulatory tools, including issuing codes of practice, to enable it to meet its objectives.
- 6.3 The code of practice number 14 (governance and administration of public service pension schemes) is structured as a reference for scheme managers and pension boards to use to inform their actions in four core areas:
- governing the scheme;
  - managing risks;
  - administration; and
  - resolving issues.
- 6.4 The section of the code of practice covering governance of the scheme contains the expectations of the scheme manager and local pension board members in terms of knowledge and understanding.
- 6.5 Whilst codes of practice are not statements of the law and there is no penalty for failing to comply with them, codes have legal effect; they must be taken into account by the regulator, a court or tribunal, if they are relevant to what is being decided.
- 6.6 This policy has been written fully incorporating the expectations of the Pensions Regulator as laid out in the code of practice.

## **7. Knowledge required**

- 7.1 The Local Pension Board are required to attain knowledge in the following areas:
- Legislative framework of Firefighter Pension Scheme(s)
  - General applicable pension legislation
  - Role and responsibilities of the Local Pension Board
  - Role and responsibilities of the Scheme Manager
  - Role of advisors and key personnel

## **8. Delivery of training**

- 8.1 It is for individual Local Pension Board members to ensure they have the appropriate knowledge and understanding to enable them to properly exercise their functions as a member of the Local Pension Board. This knowledge and understanding must be kept up to date.
- 8.2 As a guide four training opportunities should be undertaken by members in a year.

- 8.3 Members will be expected to undertake a personal training needs analysis shortly after appointment to inform of further training required. The Pensions Regulator's public service toolkit is also a compulsory requirement and all members will be expected to complete within 6 months of appointment.
- 8.4 LGSS Pensions will provide members with upcoming events that maybe relevant, however, it is also the responsibility of Board members to take an interest in training and request to go on relevant courses as appropriate.
- 8.5 LGSS Pensions will maintain a written record of training and development undertaken and will send to members annually.

## **9. The Firefighters' Pensions (England) Scheme Advisory Board**

- 9.1 Each Local Pension Board is entitled to a free annual training session, funded by the statutory levy. Training will be delivered at a local venue and will be compulsory for all members to attend unless there is a substantial reasons why a member is unable to do so.

## **10. Reporting**

- 10.1 Each year the Chairman of the Local Pension Board will presented with details of the training opportunities that have been undertaken by members. The Chairman in conjunction with the Scheme Manager will determine whether sufficient training has been undertaken and will contact members individually if appropriate to do so.

## **11. Useful Links**

- 11.1 The Firefighters' Pensions (England) Scheme Advisory Board  
<http://www.fpsboard.org/index.php/local-pension-boards/training>

The Pensions Regulator Toolkit

<http://www.thepensionsregulator.gov.uk/public-service-schemes/learn-about-managing-public-service-schemes.aspx>



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# **Firefighters' Pension Scheme(s) Training Needs Analysis**

**This document can be used by delegates as part of their assessment of training needs.**

**Delegate's Name:** \_\_\_\_\_

## TRAINING NEEDS ANALYSIS – Self Assessment

Please tick appropriate level of knowledge for each topic

Topic	Familiar	Almost	Unsure
<b>Background and Understanding of the Legislative Framework of the Fire Pension Scheme</b>			
Differences between public service pension schemes like the FPS and private sector trust-based schemes			
Role of the Independent Public Service Pensions Commission			
Key provisions of the Public Service Pensions Act 2013			
The structure of the scheme and the main bodies involved including the Responsible Authority, the Scheme Manager, the Scheme Advisory Board, the Local Pension Board and the scheme employer.			
An overview of local authority law and how Administering Authorities are constituted and operate			
Scheme and connected scheme rules overview (including the Regulations)			

<b>General pensions legislation applicable to the schemes- An overview of wider legislation relevant to the schemes including:</b>			
Automatic Enrolment (Pensions Act 2008)			
Contracting out (Pension Schemes Act 1993)			
The General Data Protection Regulation 2016			
Employment legislation including anti-discrimination, equal treatment, family related leave and redundancy rights			
Freedom of Information (Freedom of Information Act 2000)			
Pensions sharing on divorce (Welfare Reform and Pensions Act 1999)			
Tax (Finance Act 2004)			

<b>Role and responsibilities of the Local Pension Board</b>			
Role of the Local Pension Board			
Conduct and conflicts			
Reporting of breaches			
Knowledge and understanding			

<b>Role and responsibilities of the Scheme Manager</b>			
Membership and eligibility			
Benefits and the payment of benefits			
Decisions and discretions			
Disclosure of information			
Record keeping			
Internal controls			
Internal dispute resolution			
Reporting of breaches			
Statements, reports and accounts			

<b>Role and responsibilities of scheme employers</b>			
Automatic Enrolment			
Deduction and payment of contributions			
Special contributions			
Employer decisions and discretions			
TUPE and outsourcing (including Fair Deal and the Best Value Authorities Staff Transfers (Pensions) Directions 2007)			

### Training Record

Date	Training Undertaken	Venue/Method

**NORTHAMPTONSHIRE FIRE  
AND RESCUE SERVICE  
LOCAL PENSION BOARD**



**LOCAL PENSION BOARD**

**10 September 2017**

**Report by: THE DEMOCRATIC SERVICES MANAGER**

<b>Subject:</b>	<b>Annual Report of the Local Pension Board</b>
<b>Purpose of the Report</b>	To consider the draft annual report of the Local Pension Board and recommend its submission to full council.
<b>Recommendations</b>	<b>The Local Pension Board are asked to review, comment on and approve its annual report.</b>
<b>Enquiries to:</b>	Paul Hanson – LGSS Democratic Services Manager Tel: 01604 366813 e-mail: <a href="mailto:phanson@northamptonshire.gov.uk">phanson@northamptonshire.gov.uk</a>

**1. Background**

- 1.1 It is generally considered good practice for the Local Pension Board to consider publishing an annual report of the Board’s activities for that year. It is consistent with good governance practices that the Board should submit this report to the the Council in its capacity as the Scheme Manager.
- 1.2 A copy of the draft Local Pension Board Annual Report is attached at Appendix 1. The report provides a summary of the work of the Board. The Board is asked to consider the Annual Report and raise any comments accordingly. Once finalised, the Annual Report will be presented to full Council on 20 September 2018. The report will also be published on the Council’s website.

**2. Content**

- 2.1 The annual report focuses on the work undertaken by the Board during the year to date. The Board are asked to comment on this content and advise if they wish to add anything further.

**3. Finance & Resources Implications**

- 3.1 Not applicable.

**4. Risk Implications**

- a) Risk(s) associated with the proposal

<b>Risk</b>	<b>Mitigation</b>	<b>Residual Risk</b>
There are no risks associated with this report.		

b) Risk(s) associated with not undertaking the proposal

Risk	Risk Rating
There are no risks associated with this report.	

**5. Communication Implications**

5.1 Not applicable.

**6. Legal Implications**

6.1 Not applicable.

**7. Consultation with Key Advisers**

7.1 Not applicable.

**8. Alternative Options Considered**

8.1 Not applicable

**9. Background Papers**

9.1 Not applicable

**10. Appendices**

**Appendix 1: Annual Report by the Local Pension Board**

<b>Checklist of Key Approvals</b>	
Is this decision included in the Business Plan?	Not applicable
Will further decisions be required? If so, please outline the timetable here	Not applicable
Is this report proposing an amendment to the budget and/or policy framework?	No
Has this report been cleared by Director of Finance/Section 151 Officer?	Not applicable
Has this report been cleared by Head of Pensions?	No
Has this report been cleared by Legal Services?	Not applicable

**Northamptonshire  
Firefighters' Pension Scheme  
Local Pension Board**

**Annual Report  
2017-18**

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## Chairman's Foreword

I am pleased, as Chairman of the Northamptonshire Firefighters' Pension Scheme Local Pension Board, to introduce the Board's latest Annual Report. Local Pension Boards are bodies established by statute and tasked with assisting the Council by ensuring it is administering the scheme effectively and in compliance with the law.

The Board was established by the Council in March 2015. Much of the Board's first year of operation was occupied with putting in place the policies and procedures necessary for the satisfactory operation of the Board according to statutory requirements and guidance. In order to provide assurance to the Council that the Board is operating within the relevant statutory provisions, the Board's first annual report focused on these areas.

This, the third report of the Board, focusses on the work the Board has undertaken over the past year. During this time, the Board has sought to assist the Scheme Manager by reviewing policies and practices, as well as assessing the Scheme Manager's performance in line with established best practice.

Information about the Board, as well as details of the Board's work, is available on the Council's website. We want to hear from scheme members and employers about any issue or issues which may be causing them concern so please feel free to contact any member of the Board using the details set out in this report.

I am confident that the dedication and commitment of the current Board members will continue into 2018-19 in order to assist the Scheme Manager – whichever body that might be - in maintaining the high standards of the administration of the Fund.

Chairman

Northamptonshire Firefighters' Pension Scheme Local Pension Board.



## Background

The Public Services Pensions Act 2013 requires all Public Service Pension Schemes to establish a Local Pension Board. In the case of the Firefighters' Pensions Scheme, the role of the Board is to assist the Scheme Manager (Northamptonshire County Council):

- to secure compliance with:
  - the relevant regulations;
  - any other legislation relating to the governance and administration of the Scheme (and any Connected Scheme); and
  - the requirements imposed by the Regulator in relation to the Scheme (and any Connected Scheme), and
- to ensure the effective and efficient governance and administration of the Scheme (and any Connected Scheme).

The Local Pension Board is expected to complement and enhance the Council's existing arrangements for managing the scheme. It does not replace the existing arrangements and it is not a decision making body. Rather, it is designed to act as a critical friend to the Council and its officers when they act in the capacity of scheme manager.

The Firefighters' Pension Scheme (Amendment) (Governance) Regulations 2015 relating to the creation and ongoing operation of local pension came into force on 1<sup>st</sup> April 2015. These regulations required the Council to agree the establishment of a Local Pension Board in respect of the Firefighter's Pension Scheme by 1st April 2015. In this context, established means that the Council, as Scheme Manager, had to approve the creation of the Board and agree its composition and terms of reference in accordance with its constitution. It did not mean that the Firefighters' Pension Scheme Local Pension Board had to be fully operational by that date.

The Northamptonshire Firefighters' Pension Scheme Local Pension Board was established by the Council at its meeting of full Council meeting on 19 March 2015 and held its first meeting on 29 July 2015.

## **Role and Remit**

The role and remit of the Local Pension Board is to assist the Council in its capacity as scheme Scheme Manager by making sure it is administering the Firefighters' Pension Scheme effectively and efficiently and, in doing so, is complying with relevant laws and regulations. The Board does this by reviewing the policies and practices that the Council has adopted and checking them against the applicable regulations, as well as comparing them to examples of best practice elsewhere. It is a slightly different role when compared to the (seperate) Board charged with overseeing the Local Government Pension Scheme arrangements as the Firefighters' Pension Scheme is an unfunded scheme with no investment aspect.

## Constitution and Membership

The Council approved the terms of reference for the Firefighters' Pension Scheme Local Pension Board on the basis that the Board is a stand-alone authority. It has also approved standing orders for the Board. A copy of both documents is available at the following link:

[https://cmis.northamptonshire.gov.uk/cm5live/Committees/tabid/110/ctl/ViewCMIS\\_CommitteeDetails/mid/558/id/449/Default.aspx](https://cmis.northamptonshire.gov.uk/cm5live/Committees/tabid/110/ctl/ViewCMIS_CommitteeDetails/mid/558/id/449/Default.aspx)

A concise summary of the Firefighters' Pension Scheme Local Pension Board's terms of reference is set out in the Council's constitution (see Part 2, Article 9 (Local Pension Boards) and Part 3 (Responsibility for Functions):

<https://cmis.northamptonshire.gov.uk/cm5live/PublicDocuments.aspx>

In order to ensure they are fully representative, all Local Pension Boards must include an equal number of employer and member representatives with a minimum requirement of no fewer than four in total. At its meeting in March 2015, the Council agreed to establish a Firefighters' Pension Scheme Local Pension Board with two employer representatives and two scheme member representatives. The term of appointment for all members is four years or until qualification for membership ceases.

Council determined that one of the employer representatives were to be appointed by Full Council directly, while all other members were appointed via an open and transparent selection process.

## Employer Representatives

Member	Email	Appointed
Shaun Hallam	<a href="mailto:shallam@northantsfire.org.uk">shallam@northantsfire.org.uk</a>	July 2018
Councillor Graham Lawman	<a href="mailto:gmlawman@northamptonshire.gov.uk">gmlawman@northamptonshire.gov.uk</a>	September 2015

## Scheme Member Representatives

Member	Email	Appointed
Jim Dorrill	<a href="mailto:JDorrill@northantsfire.org.uk">JDorrill@northantsfire.org.uk</a>	June 2015
Terry Smith	<a href="mailto:TSmith@northantsfire.org.uk">TSmith@northantsfire.org.uk</a>	June 2015

The Chair and Vice-Chair of the Board is elected by the Board on annual basis. The current Chair is Jim Dorrill and the Vice Chair is Terry Smith.

The Board has met twice during the period of this Annual Report. The attendance record for members of the Board is detailed below:

Date	David Harding*	Councillor Graham Lawman	Jim Dorrill	Terry Smith	Shaun Hallam*
01/12/17	Attended	Attended	Attended	Attended	N/A
10/09/18	N/A				

\* Dave Harding retired from the Board in 2018 and was replaced by Shaun Hallam

## **Firefighters' Pension Scheme Administration**

At its meeting in December 2017, the Board received a general update on the administrative performance of the Firefighters' Pension Scheme in Northamptonshire. The Board reviewed the following key performance indicators (KPIs)

- Notify employees retiring from active membership of benefits award
- Notify leavers of deferred benefit entitlement
- Provide transfer in quote to scheme member
- Confirm transfer in payment and benefits credited to scheme member
- Provide a cash equivalent transfer value
- Process transfer out and issue CETV statement
- Provide a divorce quotation
- Obtain details of beneficiaries after advice of death
- Provide an estimate of benefits
- Calculate cost of purchasing additional pension and notify scheme member

All of which have a 10 day target for completion. The Board were advised that all of the targets were met during the period under review.

The Board also received an update on work that had been undertaken to reconcile administration records with pensioner payroll records. The Board were advised of the number and nature of discrepancies and the plans that had been put in place to resolve them.

The Board received an update on administration performance at their meeting on 10 September 2018.

## **Northamptonshire Firefighters' Pension Scheme(s) Draft Risk Register**

The Public Service Pensions Act 2013 added an additional provision to the Pensions Act 2004 relating to the requirements to have internal controls in public service pension schemes. The Pensions Regulator's code of practice guidance on internal controls requires schemes managers to carry out a risk assessment and produce a risk register which should be reviewed regularly.

The Local Pension Board approved a Risk Strategy In November 2016 and from this a risk register had to be established. The Board considered their risk register at their December 2017 meeting and Board members agreed to review the

register and feed back suggestions on scoring mechanisms to the LGSS Pensions team.

By way of additional information, the risk register sets out the risks that the Scheme Manager has in terms of the management of the Firefighters' Pension Schemes with administration currently undertaken by LGSS Pensions and other LGSS services, as well as the risks faced by the Local Pension Board. The risk register identifies where a risk belongs and is in control of by the Scheme Manager, and asks that the Scheme Manager insert details of the relevant tests and controls that they would like to be in place.

### **Northamptonshire Firefighters' Pension Schemes and Firefighters' Compensation Scheme Internal Dispute Resolution Procedures Policy**

It is important that the Scheme Manager has in place an internal dispute resolution procedure (IDRP) and is able to follow this procedure in order to resolve disputes about made on rights under the Firefighters' Pension Scheme 1992, the Firefighters' Pension Scheme 2006, the Firefighters' Pension Scheme 2015 and the Firefighters' Compensation Scheme. The Board requested a review of the IDRP arrangements at their meeting in June 2017. The work was undertaken by LGSS Pensions and presented to the Board for approval in December 2017.

LGSS Pensions recommended that the IDRP should be based on that set out in a circular issued by the Department for Communities and Local Government's 2009 Circular, pending further discussion on the subject taking place at a national level.

The Board reviewed a new two-page guide to the IDRP to accompany decisions under the Firefighters' Pension Schemes or the Firefighters' Compensation Scheme, a Full Guide to IDRP relating to Firefighters' Pension Scheme decisions, and a Full Guide to IDRP relating to Firefighters' Compensation Scheme decisions

The IDRP set out in the Circular includes Stage 2 decisions being taken by "elected members of the fire and rescue authority". The Board resolved that, pending the proposed transfer of the Fire and Rescue Services to the Police and Crime Commissioner for Northamptonshire, any such disputes should be determined by a panel of three county councillors. To date, no such panels have needed to be convened.

## **Firefighters' Overpayment of Pension Policy**

At their meeting on 10 September 2018, the Board considered a policy for dealing with overpayments of pension. Such a policy is intended to provide assurance to stakeholders that all overpayments are treated in a fair and equitable manner and that the Scheme Manager has satisfactory arrangements in place for the recovery of overpayments and the prevention and investigation of potential fraudulent activity to safeguard public funds.

The Overpayment of Pension Policy also strengthens the Scheme Manager's position should a complaint be made using the Internal Dispute Resolution Procedure (IDRP) which, if exhausted without resolution, can be referred by the scheme member or their representative to the Pensions Ombudsman or the Pensions Advisory Service.

Future development of the policy includes the addition of procedures for dealing with overpayments of retirement grants, death grants and transfer values as well as underpayments of pensions to provide assurance that any incorrect payment has an established process for correction.

## **Member Training Policy**

At their meeting on 10 September 2018, the Board considered a Member Training Policy. This policy is required to assist the Local Pension Board in performing and developing their individual roles with the ultimate aim of ensuring that the Northamptonshire Firefighters' Pension Schemes are managed and assisted by individuals who have the appropriate level of knowledge and skills as required by the Public Service Pensions Act 2013.

The Local Pension Board are required to attain knowledge in the following areas:

- Legislative framework of Firefighter Pension Scheme(s)
- General applicable pension legislation
- Role and responsibilities of the Local Pension Board
- Role and responsibilities of the Scheme Manager
- Role of advisors and key personnel

The knowledge required can be obtained through a variety of methods and the policy ensures that key assessment and training is undertaken. These comprise of a training needs analysis, completion of the Pensions Regulator Toolkit and attendance at the Scheme Advisory Board annual training.

DRAFT



## **Board Meetings**

Full papers and minutes for The Firefighters' Local Pension Board are available here:

[https://cmis.northamptonshire.gov.uk/cm5live/Committees/tabid/110/ctl/ViewCMIS\\_CommitteeDetails/mid/558/id/449/Default.aspx](https://cmis.northamptonshire.gov.uk/cm5live/Committees/tabid/110/ctl/ViewCMIS_CommitteeDetails/mid/558/id/449/Default.aspx)

DRAFT

## **Work Programme 2018-19**

The Firefighters' Pension Scheme Local Pension Board maintains a work programme which is considered at every meeting. Now that the Board is established and members have completed a number of training activities it will begin to select topics for in-depth analysis with a view to making recommendations to the Pension Committee on a regular basis.

The Work Programme for 2018-19 is as set out below:

*Add work programme when completed*

DRAFT

# Key Officers supporting the Local Pension Board

**Head of Pensions**

Mark Whitby

[MWhitby@northamptonshire.gov.uk](mailto:MWhitby@northamptonshire.gov.uk)

01604 368502

**Governance & Regulations  
Manager**

Joanne Walton

[JWalton@northamptonshire.gov.uk](mailto:JWalton@northamptonshire.gov.uk)

01604 367030

**Principal Regulations Officer**

Gary McLellan

[GMcLellan@northamptonshire.gov.uk](mailto:GMcLellan@northamptonshire.gov.uk)

01604 368982

**Governance Officer**

Michelle Oakensen

[MOakensen@northamptonshire.gov.uk](mailto:MOakensen@northamptonshire.gov.uk)

01604 366535

**Democratic Services Manager**

Paul Hanson

[phanson@northamptonshire.gov.uk](mailto:phanson@northamptonshire.gov.uk)

01604 366813

**Democratic Services Officer**

Jenny Rendall

[jrendall@northamptonshire.gov.uk](mailto:jrendall@northamptonshire.gov.uk)

01604 367560

**NORTHAMPTONSHIRE  
PENSION FUND**



**LOCAL PENSION BOARD**

**10 September 2018**

**Report by: THE DEMOCRATIC SERVICES MANAGER**

<b>Subject:</b>	<b>Meeting Dates 2019-20</b>
<b>Purpose of the Report</b>	To present the Northamptonshire Pension Fund with proposed dates for meetings during 2019-2020
<b>Recommendations</b>	<p><b>The Board are asked to approve meeting on the following dates:</b></p> <ul style="list-style-type: none"> <li>• <b>Monday 11 March 2019</b></li> <li>• <b>Monday 9 September 2019</b></li> <li>• <b>Monday 9 March 2020</b></li> </ul>
<b>Enquiries to:</b>	<p>Name – Jenny Daniels, Democracy Officer                  Tel – 01604 367560                  E-mail: <a href="mailto:Jdaniels@northamptonshire.gov.uk">Jdaniels@northamptonshire.gov.uk</a></p>

**1. Background/Introduction**

1.1 The Local Pension Board is required to set meeting dates during the year. Giving as much notice as possible is an advantage in ensuring as many of those required can attend as possible.

**2. Relevant Pension Fund Objectives**

<b>Perspective</b>	<b>Outcome</b>
<b>Administration</b>	<ul style="list-style-type: none"> <li>• Provide a high quality, friendly and informative administration service to the Funds' stakeholders.</li> </ul>
<b>Governance</b>	<ul style="list-style-type: none"> <li>• To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies.</li> </ul>

**3. Finance & Resources Implications**

3.1 There are none.

**4. Risk Implications**

a) Risk(s) associated with the proposal

<b>Risk</b>	<b>Mitigation</b>	<b>Residual Risk</b>
There are no risks associated with the proposal		Green

b) Risk(s) associated with not undertaking the proposal

<b>Risk</b>	<b>Risk Rating</b>
That there will be no opportunities for the Local Pension Board to meet and items of business will not be completed.	Amber

## **5. Communication Implications**

5.1 There are no communication implications from this report.

## **6. Legal Implications**

6.1 There are no legal implications from this report.

## **7. Consultation with Key Advisers**

7.1 The Committee timetable for Council meetings was consulted when considering the dates on which to meet.

## **8. Alternative Options Considered**

8.1 There are no alternative options to this proposal.

## **9. Background Papers**

9.1 None applicable.

## **10. Appendices**

None.

<b>Checklist of Key Approvals</b>	
Is this decision included in the Business Plan?	NO
Will further decisions be required? If so, please outline the timetable here	N/A
Is this report proposing an amendment to the budget and/or policy framework?	NO
Has this report been cleared by Chief Finance Officer/Section 151 Officer?	N/A
Has this report been cleared by The Head of Pensions?	N/A
Has the Chairman of the Pension Fund Committee been consulted?	N/A
Has this report been cleared by Legal Services?	N/A