

# NPCC Police Pensions Bulletin 17 – 13/03/2025

#### Welcome

We would like to welcome all our readers to the NPCC Police Pensions Bulletin number 17. Email <a href="mailto:npccpensions@npcc.police.uk">npccpensions@npcc.police.uk</a> to be added to the mailing list.

Please ensure that you read this bulletin, carry out any actions, escalating items / alerting colleagues where necessary, and circulate / discuss this bulletin with other colleagues in your organisation, and let us know if you have any questions.



#### **Actions for Local Pension Boards**

- > Review the <u>bulletin actions tracker</u> and complete as necessary.
- Add the RSS issuance to your agenda for discussion.
- ➤ Ensure the regular <u>McCloud remedy data requests</u> are completed and added to pension board agenda for discussion / review.

# **Actions for Scheme Managers**

- Review the bulletin actions tracker and complete as necessary.
- ➤ Discuss with pension administrator outstanding <u>RSS cohorts</u>, communication plans and progress on issuance.
- > Set up an adequate way to <u>record details of RSS not issued</u> by 31 March 2025, reasons why, decision making, numbers, categories etc.
- Draft template <u>communications for members</u> who will not receive an RSS and ensure the process for delivering the communication to affected members is known.
- ➤ Ensure you have a process in place with your pension administrator for calculating the correct amount of interest due where there are <u>changes to the NS&I rate</u>.
- Action any outstanding requests for interforce data urgently.
- ➤ Review the <u>Part 4 Tax Loss and Scheme Pays Elections</u> and ensure that you have a process for dealing with receipt of SDES files from HMRC.
- ➤ Ensure the regular <u>McCloud remedy data requests</u> are completed and sent to NPCC.

Update your <u>contact details</u> in Exchange for TPR and nominate contacts for Pensions Dashboards

### **Actions for Pension Administrators**

- Review the bulletin actions tracker and complete as necessary.
- ➤ Discuss with the scheme manager the outstanding <u>RSS cohorts</u>, communication plans and progress on issuance.
- Assist discussions with the scheme manager about the <u>communication plan</u> to <u>affected members</u> who will not receive an RSS by 31 March 2025.
- Ensure you have a process in place with your scheme manager for calculating the correct amount of interest due where there are <u>changes to the NS&I rate</u>.
- ➤ Review the <u>Part 4 Tax Loss and Scheme Pays Elections</u> and ensure that you have a process for dealing with receipt of SDES files from the scheme Manager via HMRC.
- Provide reports to the scheme manager to enable them to complete the RSS return.
- ➤ Review the <u>view data template</u> for Pensions Dashboards and consider if there are any issues with your data.

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### **Bulletin actions tracker**

The <u>bulletin actions tracker</u> has been updated with the headings and actions from this bulletin.

# Latest updates for McCloud remedy

# Issuance of RSS'

Did you know that there are ONLY 18 days left in which to issue an RSS by the statutory deadline?

Discussions between scheme managers and pension administrators should be well underway to determine:

• How many RSSs for each force will not make the deadline.

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- The different cohorts of affected members.
- Whether they fall into a Section 29(10b) extension of the relevant date or they will be treated as a breach of the statutory date.

We have spoken to The Pension Regulator (TPR) and we consider that an acceptable use of Section 29(10b) could be for some limited reasons, such as cases where you are unable to provide the member with a correctly calculated RSS:

- i. GAD guidance for transfer or divorce
- ii. A revised club transfer awaited from another public sector scheme
- iii. An incomplete ill health re-assessment process
- iv. Missing interforce data
- v. Accuracy of historical data
- vi. Some other policy issue arising

Cases that have not been processed due to either software issues or resourcing issues are not considered to be an acceptable use of Section 29(10b).

For any cases where it is not appropriate to use Section 29(10b), they will be a breach of law. This means that these cases will need to be assessed as a breach and the scheme manager will need to determine if the breach is material and if so, make a report to TPR.

Scheme managers should also be aware that the relevant date can only be extended once through Section 29(10b) and that once this date has been reached, if an RSS has still not been issued, then this will need to be recorded as a breach and assessed accordingly. Therefore, determining a relevant date that is reasonable in all circumstances is essential to prove that due consideration has been given to all the facts of a particular case.

The material breach guidance and record of assessment form can be found on K-Hub.

We will be requesting details in the April bulletin about these details and the reasons that you have used for extending the relevant date, therefore scheme managers are reminded that they will need to record this information for future reporting.

# Communicating to affected members

Whilst the final numbers of those cases which may not receive an RSS by 31 March 2025 may not yet be known, some preparation work can be done in readiness for issuing communications to affected members.

Scheme managers should start to draft communications for the various groups / cohorts so the templates are ready to go. Scheme managers may want to do this in conjunction with their administrator to ensure that realistic timescales can be communicated.

NPCC will not be issuing any additional national template letters or communications for scheme managers to use other than the <u>known delays to RSS'</u> document, which was published on our website on 27 February 2025. NPCC are unable to provide any further bespoke communications as not all forces and administrators are in the same position.

In addition, scheme managers will also want to ensure that they have identified the necessary process of how the communications will be issued to members. Scheme managers should consider:

- How will the communication be issued? Via email or sent by post to home address or an alternative?
- Who will send the communications? The force or the administrator?
- How will you obtain the list of email addresses or home addresses (if being used)
- What processes will be used to ensure that the right communication goes to the right member?
- When will the communications be sent? Are there some cases which are more easily identifiable and can be sent sooner rather than later?

It is inevitable that some members may not receive a statement by 31 March 2025 despite being forecasted to receive one due to last minute errors in the process, it is important that these members receive follow-up comms as soon as possible if they do not receive a statement by the deadline.

# GAD guidance

#### Non club transfer ins

On 28 February 2025 an email was sent to all pension administrators and scheme managers to provide them with a copy of the GAD guidance for how to apply remedy to Non-Club transfer ins received within the remedy period.

This guidance is also available on the <u>K-Hub</u>.

#### Divorce

#### Prospective divorce guidance

• This relates to divorces where the first CETV for the divorce is provided to the court on or after 1 October 2023.

 This is currently with pension administrators for any final comments and GAD have confirmed that the final version of this guidance, including some worked examples, will be available this month (March 2025).

#### Retrospective divorce guidance

- This relates to divorces where the first CETV for the divorce was provided to the court before 1 October 2023. This guidance therefore affects all members waiting for an IC-RSS who divorced before 1 October 2023.
- GAD have confirmed the first draft version of this guidance will be made available towards the end of March 2025/early April 2025. This will then follow the same process of consultation and review and therefore we can expect this to be finalised by the end of June 2025.

# Changes to NS&I rate

In <u>Bulletin 13 14/11/2024</u> we advised that GAD had produced a new calculator which would calculate the periodical contributions for opted out service, but would also now allow users to update the NS&I rate themselves. This option is not available in previous versions of the calculator.

Forces and administrators will need to determine if they need to re-populate the data into the <u>new GAD contributions calculator</u> or if they can use the <u>stand-alone interest calculator</u> to calculate the right amount of interest – for either calculator the latest NS&I rates will need to input by the user.

The <u>historical NS&I rates</u> can be found on the NS&I page under the Direct Saver tab. The latest change is from 5 March 2025 to 3.30%.

Date	Rate	Date	Rate
23/05/2024	4.00%	20/11/2024	3.75%
20/12/2024	3.50%	05/03/2025	3.30%

# Missing data - Interforce transfers

We have been receiving a number of emails from forces where they are still waiting for information from a previous force. In some cases, these requests have been outstanding for over one year.

We would like to remind all forces, that if you receive a request for the remedy data and GAD data, that you have a legal requirement and obligation to provide this and you should do so within a reasonable timeframe.

We have been reminding scheme managers that they should ensure that they have adequate processes in place to deal with such requests and it is disappointing to hear that despite these reminders and repeated requests from forces that this data is still missing.

Forces that have been highlighted to us over the last week that are not passing on data are:

Avon & Somerset	City of London	Hampshire
West Midlands	West Mercia	Police Scotland

If you are on the naughty list, please can you ensure that you respond to any outstanding queries you have as soon as possible. Scheme managers who are not providing data to other forces are preventing an RSS being issued to a member, which is one less statement meeting the statutory deadline.

# HMRC Digital Service - SDES files

We are pleased to confirm that after discussions with HMRC and HMT we have been able to provide a guide for SDES files that scheme managers may receive after a member has used the HMRC digital service to calculate their adjustment in respect of annual allowance.

The Part 4 Tax Loss and Scheme Pays Elections – HMRC digital service guidance document is available on K-Hub.

# Contingent Decisions - opted out service

Scheme managers are reminded that members need to provide a statement setting out that they would have done something differently if it had not been for the discrimination.

It is therefore important to note that certain dates are key and opt out decisions taken after these dates may be more difficult to prove as they occur <u>after</u> government had accepted the courts finding of discrimination and consulted on the remedy.

On **15 July 2019**, the government made <u>written statement HCWS1725</u> accepting the Court's decision and confirming their intention to engage with the ET to agree remedy. The written statement confirmed that remedy would apply across all public sector schemes, and the government also confirmed their intent to extend the same treatment to all members, who are in the same legal and factual position as the claimants, whether they are claimants or not

In **February 2021** government <u>responded to their consultation</u> on changes to transitional arrangements to the 2015 scheme.

Even if it was accepted that the member did not know and was not told about the government's intention to remedy before they retired, compensation is only available for a direct financial loss. If members feel they would have done something else, like not left employment or not retired they would have to raise that through an employment tribunal.

### Regular McCloud remedy data requests

Please ensure that someone at your force is collating this information, we recommend that Local Pension Boards include this on their agenda.

Completed returns should be emailed to <a href="mailto:npccpensions@npcc.police.uk">npccpensions@npcc.police.uk</a>. Data that is shared with NPCC may be shared with the appropriate government contacts from time to time.

### RSS monthly reporting

The RSS monthly data request for RSS' issued in February 2025 is now due.

Scheme managers are reminded that this is a new style template and that numbers of outstanding RSS at the end of February will need to be populated.

#### Police Pension Website

# News page

There have been two news items added to the website:

- We issued a <u>statement of progress</u> on issuance of Remediable Service Statements and a further document to help members understand where there might be <u>delays in receiving an RSS</u>.
- There has been an amendment to the wording of the FAQ When can I expect to receive my remedy pension and lump sum arrears to help members understand that there may be local variances and that they should not make any financial commitments before they know when the arrears will be paid.

# FAQ page

A new FAQ has been added to the <u>FAQ page</u> on the website:

 What is a chapter 1 scheme which also includes information about the BTP, the Civil Nuclear and the Ministry of Defence schemes

### Pensions Dashboards

#### View data

The NPCC Dashboard Working Group have produced some material to aid the sector. The latest document is a table of the data standards and the preferred entries which administrators should be ensuring are sent as view data.

Administrators are urged to review this along with the <u>data standards</u>, their own expectations and that of their ISP and software capabilities, please let us know if you foresee any issues with any of the entries.

### Pension Regulator – update your contact details

The Pension Regulator has contact details for the scheme manager based on the annual scheme return that is completed, in some cases this is recorded as being a general email address, rather than a specific individual. Communications from TPR about Dashboards are being sent to this address which will also be used to issue unique connection codes.

It is really important that every scheme manager checks their contact details on <u>exchange</u> and updates these where necessary.

In addition, TPR have informed us that only 11 of the 43 scheme managers have nominated a dedicated contact for dashboards. Please note that this should not be your pension administrator but will need to be a suitable contact within your force.

All scheme managers should check who you have nominated, and or nominate the right contact by sending an email to the customer support team at TPR customersupport@tpr.gov.uk.

# Technical queries, information and police pension updates

If you have a query that you want to raise with the NPCC Police Pensions Team, please send an email to <a href="mailto:npccpensions@npcc.police.uk">npccpensions@npcc.police.uk</a> we can then ensure that the query is picked up by the most appropriate team member.

# Other useful updates

# Consultation response - HMRC offsetting

HMRC issued a technical consultation on 21 February 2025, and they held a series of roundtable meetings to discuss the draft legislation between 26 February and 3 March before the consultation closed on 6 March 2025.

We were not involved in issuing invitations to these roundtables, but we were pleased to note that most police pension administrators managed to attend the roundtable on 26 February.

HMRC issued some information in relation to the consultation which can all be found on the K-Hub.

- The draft regulations.
- The guidance from HMRC to accompany the draft legislation.
- The HMRC slides from the roundtable.
- An Excel spreadsheet for the reporting of offsetting.

NPCC were able to provide a response to this consultation which was submitted to HMRC on 6 March 2025.

#### **HMRC** bulletins

On 3 March 2025, HMRC published their Pensions Schemes <u>Newsletter 167</u> which contains information about

- The Managing Pension Schemes Service.
- Changes to forms for Qualifying Recognised Overseas Pension Schemes QROPS.
- The reporting requirements in relation to lump sums following the abolition of the LTA.

# Changes to the Home Office policy team

On 13 February 2025, a <u>Written Ministerial Statement (HCWS455)</u> was made about the Machinery of Government which affects the fire policy team at the Home Office.

There is currently a joint police and fire pensions policy team at the Home Office and with effect from 1 April 2025, the part of the Home Office Team that deals with fire pensions policy will be moving from the Home Office to the Ministry of Housing, Communities and Local Government (MHCLG).

This does mean that there are likely to be some adjustments to workplans as resources are adjusted following the move which may impact police pensions.

# NPCC Pension Team update

We are very sad to announce that Clair Alcock will be leaving NPCC as Head of Police Pensions in May 2025.

Clair's leadership over the last 3 ½ years has been crucial to enable the police sector to deliver remedy to the majority of members by the statutory deadline. Her passion and vigour has brought various stakeholders together to achieve a common goal and to provide stability and consistency to police pensions.

Plans are underway to recruit for her replacement and for whoever comes next, they will have the task of leading the sector through the transition to the shared service arrangement to provide the scheme manager function to all 43 forces.

We would like to congratulate Clair who joins the Local Government Association on 19 May as Head of Pensions for both LGPS and Fire and we wish her all the best in her future role. Further details about Clair's leaving arrangements will be shared in due course.

### **Useful links**

NPCC webpages	K-Hub	Other
Police Pension Info	Pensions chat index & slides	Previous years PI multiplier tables
<u>Latest News and Updates</u>	Bulletin index and slides	HMRC Pension Schemes newsletters
FAQ page	Annual Statutory Instruments	NS&I Historical rates
Member Remedy Documentation	Remedy toolkit information	NS&I interest rates - current
		HMRC Digital Service

# Meeting updates

Minutes of meetings / slides published since last bulletin

- Remedy Implementation Group: <u>22 January 2025</u>.
- Pensions Chat: <u>13 February 2025</u> and <u>27 February 2025</u>.
- Pensions Dashboard Working Group: 20 February 2025.

# Remedy Implementation Working Group

The last meeting of this group was held on 4 March 2025. As this was the last meeting within the remedy implementation period, this group will now be repurposed into a Scheme Manager Pension Lead Forum.

It is expected that the same people will be attending, but the agenda will be broadened to take account of the wider pension landscape such as Pensions Dashboards and the transition to the shared service arrangement to provide the scheme manager function to all forces.

# Vacancy on working group

We have a vacancy on our Pensions Dashboard Working Group. If you are interested in joining this group, please email Claire Neale (Claire.neale@npcc.police.uk) in the first instance.

# Upcoming meeting dates

Everyone is welcome to attend Pensions Chat as these are fortnightly verbal updates for all stakeholders. All other meetings are by invitation only, but minutes and associated papers may be useful to all stakeholders.

NB: \*Until invites are set out, dates and times for meetings may be subject to change

Meeting	Next meeting date
Pensions chat	• 27 March 2025 at 2.30pm*
Previous session slides on K-Hub	• 10 April 2025 at 2.30pm*
Police Pension Scheme Advisory Board	• 1 April 2025 10.30am to 2.30pm
England and Wales (SAB)	• 10 July 2025 10.30am to 230pm
	• 14 October 2025 10.30am to 2.30pm
Scheme Manager Steering Group	• 24 April 2025 1pm to 2.30pm
(SMSG)	• 3 June 2025 1pm to 2.30pm
Pensions Dashboard Working Group	• 3 April 2025 2pm to 3.30pm
All papers and action log on <u>K-Hub</u>	• 15 May 2025 2pm to 3.30pm*
Administrator Technical Forum	21 May 2025 10am to 11 20am*
All papers and action log on <u>K-Hub</u>	• 21 May 2025 10am to 11.30am*
Single Scheme Manager: Local	• 24 April 2025 10am to 11.30am
Arrangements Project Board (LAPB)	• 2 June 2025 1.30pm to 3pm

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# Contacts

Role	Name	Email address
Head of Police Pensions	Clair Alcock	Clair.alcock@npcc.police.uk
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Police Pension Advisor	Claire Neale	Claire.neale@npcc.police.uk
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