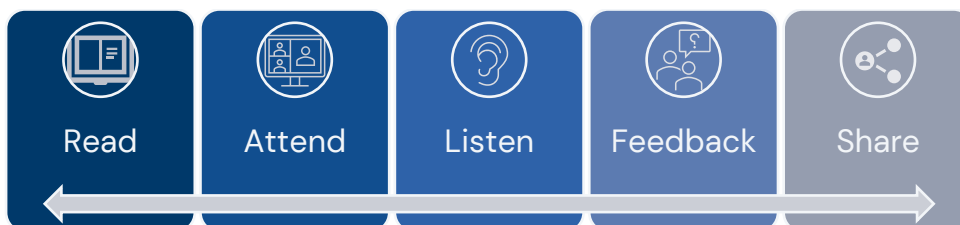


NPCC Police Pensions Bulletin 18 – 10/04/2025

Welcome

We would like to welcome all our readers to the NPCC Police Pensions Bulletin number 18. Email npccpensions@npcc.police.uk 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 [bulletin actions tracker](#) and complete as necessary.
- Add the [RSS issuance](#) to your agenda for discussion.
- Ensure the [regular McCloud remedy data requests](#) are completed and added to pension board agenda for discussion / review.

Actions for Scheme Managers

- Review the [bulletin actions tracker](#) and complete as necessary.
- Complete and return the [RSS outstanding data](#) spreadsheet. This is separate and in addition to the regular monthly reporting.
- Review the latest information on [contingent decision pause](#) and inform NPCC if you have any relevant cases.
- Ensure your [IDRP processes](#) are up to date and members know how to compete and return an IDRP where they have not received an RSS within the statutory timescales.
- Ensure the [regular McCloud remedy data requests](#) are completed and sent to NPCC.
- Discuss with your administrator to identify any relevant deceased cases in light of the 2017 [Brewster judgment](#) and what actions were taken.
- Identify relevant cases that are paying reduced rate contributions under [Regulation 36](#)

Actions for Pension Administrators

- Review the [bulletin actions tracker](#) and complete as necessary.
- Provide reports to the scheme manager to enable them to complete the [RSS return](#).
- Discuss with your scheme manager to identify any relevant deceased cases in light of the 2017 [Brewster judgment](#) and what actions were taken.

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Bulletin actions tracker

The [bulletin actions tracker](#) has been updated with the headings and actions from this bulletin.

Latest updates for McCloud remedy

Outstanding RSS' at end of implementation period

31 March 2025 was the end of the statutory implementation period for the McCloud remedy, how did police pensions in England and Wales do?

We know that we have performed much better than any other public service pension scheme and this is something that you should all be proud of, but we do not have any precise numbers that we can share with Home Office, HMT, or with other interested stakeholders, and without this vital management information police pensions cannot be given the kudos that it so richly deserves.

Our expectation is that all scheme managers will:

- Be well appraised of the number of cases and categories of those members that did not receive an RSS by 31 March 2025, and
- Have made any relevant decisions about extending the relevant date before 31 March 2025, and
- Documented and recorded all decision making.

As NPCC have made it very clear over the last couple of months that we would be collecting information about numbers and reasons of cases that had their relevant date extended or were treated as a breach of law, we fully expect ALL scheme managers to provide the information requested.

This request is for scheme managers, it is not expected to come from your pension administrator, this is because as the scheme manager you will have had to make decisions about which cases can or cannot have their relevant date extended under Section 20(10b).

The [Outstanding RSS data spreadsheet](#) must be returned to NPCC as soon as possible but no later than Friday 25 April 2025.

Contingent Decisions – opted out service reinstatement pause

The Home Office are carrying out a forensic review of the legislation to determine what groups of members can reinstate opted out service to the PPS 1987.

We recently informed you that members who opted out after 31 March 2015 and did not rejoin during the remedy period can reinstate their opted out service within the remedy period to the PPS 1987.

In addition, a further cohort of members with opted out service has now been identified as being able to reinstate to the PPS 1987, that is those that opted out after 31 March 2015 and did opt back in within the remedy period, but there are two important points to consider:

- The period from date of rejoining to the end of the remedy period can still only be treated as PPS 2006, this period cannot under current legislation also be moved back to PPS 1987.
- It is only the period of opted out service up to date of rejoining that can be reinstated to the PPS 1987.

We have raised the practical issues of implementing this, such as two legacy schemes in the remedy period, active service across two different legacy schemes, weighted accrual, how benefits are calculated and what remedy options the member can have.

To enable us to work with the Home Office through some of these issues, scheme managers are urged to notify NPCC ASAP if you identify any of these cases.

GAD guidance – Divorce

The initial DRAFT version of the retrospective divorce GAD guidance was issued to administrators and software suppliers on 21 March 2025.

The final version of the prospective divorce GAD guidance was issued to administrators and software suppliers on 25 March 2025.

Offsetting

As a result of remedy, some members will receive top-up payments of lump sum that will be unauthorised. This means the original unauthorised amount (UA) is now overpaid, the new UA needs to be offset from the old UA so the member pays the difference. This is known as offsetting.

- HMRC have amended regulations to allow for this and provided guidance on how the regulation provision for offsetting works.
 - HMRC legislation [The Public Service Pension Schemes \(Rectification of Unlawful Discrimination\)\(Tax\) Regulations 2025](#) this is the third set of tax regulations for discrimination and sets out the legislative position for the offsetting which is needed for immediate choice members who previously received an unauthorised payment
- GAD have provided methodologies for how administrators will use the amended regulations to allow for this in practice. On 18 March 2025 GAD held a joint police and fire administrator meeting to discuss the offsetting and to talk through some additional examples that they had prepared

The collection of guidance is available on [K-Hub](#).

IDRPs

As some members have not received an RSS by the statutory deadline of 31 March, scheme managers should expect to receive IDRPs from members affected.

Scheme managers are urged to ensure that they have robust processes in place to enable them to respond in a timely manner to any IDRPs. Any response will obviously need to give a full clear and transparent explanation to the member about why they have not received an RSS by the statutory deadline, or information about how the force has made a section 29 decision to extend the relevant date.

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 npccpensions@npcc.police.uk. 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 March 2025 is now due. This also includes totals of outstanding RSS' at the end of the month.

Contingent decision reporting

The [contingent decision quarterly reporting](#) for Q4 of 2024/25 is now due.

Compensation reporting

The [compensation quarterly reporting](#) for Q4 of 2024/25 is now due.

Correspondence with HMT

On [22 November 2024, NPCC wrote to HMT](#) about the compensation scheme, the HMRC digital service and the challenges faced by locally administered schemes.

On [18 March 2025, a response from HMT](#) was received in which they recognised that there is no end date to compensation, there are no limits to financial services costs, as well as issues with the HMRC digital service.

Police Pension Website

FAQ page

A new FAQ has been added to the [FAQ page](#) on the website:

[What happens to my 2015 pension if I retire after age 55?](#) Which also contains information about:

- Taking your PPS 2015 pension before normal pension age
 - Deferring your PPS 2015 pension until a later date
 - How do I know what my normal pension age is?
-

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 npccpensions@npcc.police.uk we can then ensure that the query is picked up by the most appropriate team member.

Brewster – nominated cohabiting partners

On 8 February 2017, a judgment was handed down in respect of the requirement for the nomination for a survivors pension to be made in the case of [Brewster v NILGOSC](#)

The police pension scheme regulations were amended in 2018 to make it clear that it was not a requirement to have completed a declaration of nominated cohabiting partner form to get access to a surviving adult partner pension or a death grant.

The amendments were effective from 6 April 2006, meaning that scheme managers were required to consider all relevant past cases from the PPS 2006 or PPS 2015 scheme that occurred between 6 April 2006 and 8 October 2018 (when the amendments were laid) to determine if the scheme member who met the conditions were now eligible for a survivor's pension or a death grant lump sum.

Scheme managers should satisfy themselves that this assessment was carried out at the time and if it was found that this work was not completed then they should work with their pension administrator to conduct the necessary reviews.

Capitalised ill health costs

The capital costs were put into the Police Pension Fund Regulations to ensure that where an officer takes an ill health retirement before their normal pension age that the force transfers money to pay for the officer leaving and taking benefits prematurely.

Originally [paragraphs 7 to 9](#) covered details about the costs for the PPS 1987 and the PPS 2006. The Police Pension Fund Regulations 2007 were amended in 2018 and [paragraphs 9A and 9B](#) were inserted to [Regulation 5](#) to incorporate ill health retirements from the 2015 scheme.

- [Regulation 102](#) of the 2015 Regulations sets out the criteria for an entitlement to an ill health pension for an active member of the 2015 scheme
- [Paragraph 23 of Schedule 4](#) of the 2015 Regulations sets out the criteria for an entitlement to an ill health pension for a transition member of the 2015 scheme
- [Regulation 159](#) of the 2015 Regulations sets out the meaning of final pay
 - [Regulation 33](#) determines what are pensionable earnings
 - [Regulation 168\(4\)](#) determines the amount of pensionable earnings for a part time member

If an officer retires and has already met the NPA then they do not meet the criteria of Regulation 102, or paragraph 23 of schedule 4 and therefore paragraph 9A or 9B of Regulation 5 does not apply.

Deferred pensions that are brought into payment early on health grounds are not covered by the Police Pension Funding regulations – it only relates to ill health pensions that are paid for active retirements before their NPA.

Regulation 36 (reduced member contributions)

The Home Office have confirmed that progressing on regulation 36 is in their workplan for this year however as yet they have not been able to provide an update.

The Home Office guidance issued in February 2023 states that all joiners should pay the full rate, and where cases are in train, that the scheme manager should determine in favour of the member. This means that all new members or those who were in train for an assessment will pay the full rate.

There has been no update on those who were already paying a reduced rate and these members must remain paying the reduced rate as there is currently no legal basis to change the position and to collect any additional costs from the member.

In preparation for work that will need to be carried out, scheme managers are urged to ensure that they have an accurate list of relevant cases and the current status and position of the members affected.

- Members, past or present, that are or were paying reduced rate contributions as at 1 February 2023 to date.
- Details to identify the member
- Details about when they started paying reduced rate
- Whether they are current serving or have since left / opted out, if they are a leaver, details of their leaving

Other useful updates

HMRC bulletins

On 27 March 2025, HMRC published [Newsletter 168](#) which contains information about completing a pension scheme return via the Managing Pensions Schemes Service, as well as the deadlines for applying for lifetime allowance protections.

HMRC information requirement

HMRC have provided some guidance for pension schemes about the [requirements of information](#) and reporting that pension scheme administrators need to provide to HMRC.

Scheme managers are reminded that in HMRC guidance when they refer to the 'pension scheme administrator', they mean the scheme manager; They call pension administrators 'practitioners' in their guidance.

While none of this should be new information, it is helpful to have it all listed in one place.

Useful links

NPCC webpages	K-Hub	Other
Police Pension Info	Pensions chat index & slides	Previous years PI multiplier tables
Latest News and Updates	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: [4 March 2025](#)
- Pensions Chat: [27 March 2025](#)

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.

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

Meeting	Next meeting date
Pensions chat Previous session slides on K-Hub	<ul style="list-style-type: none"> 10 April 2025 at 2.30pm 24 April 2025 at 2.30pm* 8 May 2025 at 2.30pm*
Police Pension Scheme Advisory Board England and Wales (SAB)	<ul style="list-style-type: none"> 10 July 2025 10.30am to 2.30pm 14 October 2025 10.30am to 2.30pm
Scheme Manager Steering Group (SMSG)	<ul style="list-style-type: none"> 24 April 2025 1pm to 2.30pm 3 June 2025 1pm to 2.30pm 16 July 2025 2.30pm to 4pm
Scheme Manager Pension Lead Forum (SMPLF)	<ul style="list-style-type: none"> 28 April 2025 2pm to 3.30pm 18 June 2025 2pm to 3.30pm*
Pensions Dashboard Working Group All papers and action log on K-Hub	<ul style="list-style-type: none"> 12 May 2025 2pm to 3.30pm 26 June 2025 2pm to 3.30pm
Administrator Technical Forum All papers and action log on K-Hub	<ul style="list-style-type: none"> 19 May 2025 1.30pm to 3pm 17 July 2025 9.30am to 11am*
Single Scheme Manager: Local Arrangements Project Board (LAPB)	<ul style="list-style-type: none"> 2 June 2025 1.30pm to 3pm

Contacts

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