



Minutes

for the North West Regional Police Pension Board

- Date of Meeting:** Wednesday 26th February 2020
- Time of Meeting:** 10:00hrs
- Venue:** NW Police Benevolent - St Michael's Lodge, Langho
- Chair:** Fiona Daley
- Board Members:** Ian Cosh (Vice Chair, Lancashire)
Matt Horn (Superintendents Association)
Ian Rennie (NARPO)
Keith Dickinson (CPOSA/Merseyside)
Lindsay Atherton (GMP Federation)
Steve Freeman (representing PCCs)
Elayne Gibson (Cheshire)
Michael Nulty (Cheshire)
Ann Dobinson (Cumbria)
Diane Lister (Lancashire)
Tony Wilkinson (Lancashire – HR Service Centre Manager)
Lesley Kewin (GMP)
Elaine Wilson (Merseyside)
- Other Attendees:** Jill Leaver
- Apologies:** Victor Robinson (Lancashire)
Nicola Bailey (Cheshire)
Kevin Courtney (NPCC/LGA Advisor)
Tony Bradley (Lancashire Federation)
Michelle Bellis (Cumbria/OPCC Representative)
Amy Park (GMP)

1. Welcome

The chair opened the meeting and welcomed everyone.

2. Conflicts of Interest

The following conflicts of interest were noted:-

Name	Conflict
Fiona Daley	Chair of Cumbria Joint Audit Committee
Ian Cosh	Secretary and Director of CPOSA
Ian Rennie	NARPO
Keith Dickinson	CPOSA Member
Lindsay Atherton	Trustee of GMP Federation Insurance Benefit Trust (group insurance scheme)

3. Minutes & Actions

The minutes from the previous meeting were agreed.

Actions Update:

	Action from previous meeting	Update	Status
1	Track the Home Office Opt Out Information	Kevin Courtney has provided an update.	COMPLETE
2	Matt Horn to provide update/information from Supt's Association training for pension board members.	Ch. Supt Matt Horn updated the meeting and advised the session was informative and reassured the Board that they were considered as operating good practice.	COMPLETE
3	Jill Leaver to provide the PABW Secretary at the Home Office with updated contact details for the Board, for future circulations.	Supplied.	COMPLETE
4	Timetable of individual Chief Officer visits to be programmed	Fiona Daley/Jill Leaver/Ian Cosh	ONGOING (Action 1)
5	Invite XPS/Keir to attend March 2020 meeting	Jill Leaver	ONGOING (Action 2)
6	Nick Gannon /TPR colleague to attend September 2020	Jill Leaver	ONGOING (Action 3)
7	Amy Park to inform Elizabeth France of the Pension Ombudsman's decision regarding self-referred Forfeiture pension	Lesley Kewin advised that the Ombudsman had not finalised their	ONGOING (Action 4)

		decision.	
8	NWPPB to develop forfeiture guidance once the Ombudsman's decision at no. 7 is known.	Cannot be progressed until action 7 is complete	ONGOING (Action 5)
9	McCloud Sargeant pension remedy update	See main agenda item	COMPLETE
10	Ann Dobinson to share Cumbria's XPS survey data with Amy Park at GMP		COMPLETE
11	All Forces to submit TPR Survey Returns by Friday 6 th December 2019	All forces confirmed compliance with the submission request.	COMPLETE
12	Board's Annual Report to be circulated to all Scheme Managers by end of January 2020		COMPLETE
13	All forces to provide their Audit Committees with a copy of the Board's Annual Report	Jill Leaver advised the Annual Report had been circulated to the Board members with the meeting papers.	COMPLETE
14	Provide Elizabeth France with the link to the NWPPB Website		COMPLETE
15	Risk Register to include force data quality, cost of administration and benchmarking and pension challenges	Fiona Daley advised further work was required in this area.	ONGOING (Action 6)
16	Elizabeth France to obtain an update on Home Office Capability	Jill Leaver had chased Elizabeth France who was making enquiries.	ONGOING (Action 7)
17	2020 meeting matrix to be circulated to Board Members (see below)		COMPLETE

4. Current Police Pension Issues:

i. McCloud Sargeant

Ian Cosh provided the meeting with an update on the current situation and the contents of a recent newsletter (circulated with the meeting papers). Much discussion was had regarding the potential impact of any remedy. It was noted that there may be pressure to apply pension remedies quickly but the Board considered this could pose more issues and potential problems in the longterm. The Board considered that a deferred option would be the preference to reduce risks, ensure conformity and correct application of any remedy. It was acknowledged that consultation would be undertaken with individual schemes but the Board agreed it would be helpful to understand the broader issues. Whilst every scheme would have the prerogative to respond individually it was agreed that the Board's collectively agreed view(s) would be articulated to the SAB via Elizabeth France. Prior to the letter being issued Lindsay Atherton would clarify the Federation's position on the Board's proposed position.

Action(s): 8 Lindsay Atherton to confirm the Federation are happy with the Board's proposal.

Action(s): 9 **Fiona Daley and Ian Cosh to prepare a letter to Elizabeth France, SAB Chair, advising of the Board’s preferred option for any pension remedy/ies.**

ii. Funding Strategy

Ian Cosh provided the Board with an update on the funding strategy. Whilst there was good news in the short term, the medium and long-term plans were still unclear. It was hoped that central government would fund any remedies associated with McCloud Sargeant.

iii. Annual Allowances

Ian Cosh provided an update on annual allowances. Consultation had been undertaken with HMRC regarding parity with NHS Doctors in the application of annual allowances. Initial discussions had been unsuccessful, however, further research was being conducted which would be submitted for HMRC to reconsider.

Ian Cosh advised that the double accrual issue affecting CPOSA members had now received a remedy. The Policing Minister had been involved in the review. In short, every CPOSA member had been advised to contact a Financial Advisor to resubmit self-assessments. It was noted that whilst CPOSA members were affected and had conducted the work it was beneficial for the Board and scheme managers to be aware.

Ch Supt Horn advised that there had been some feedback from the Supt Association members regarding failure to provide Annual Benefit Statements (ABS) and some Annual Allowance Data. Ch Supt Horn advised that it was difficult to gauge how wide spread the issue was and how much was attributable to “user error” in understanding the data. The issues appeared to be isolated to Lancashire and Cheshire. The Board noted the concerns and asked all Forces to monitor. Lancashire and Cheshire both confirmed they would check the issues highlighted and update Ch Supt Horn directly.

Discussion was had regarding the potential of a seminar for scheme members regarding understanding pension statements and documentation.

Action(s): 10 **Ch Supt Horn will explore with the Supts. Association branch, the feasibility of arranging a members’ information session for scheme provider reps to attend.**

5. National Communications

Fiona Daley provided an update on the national communications that had been received, some of which had been circulated to Board members (*):-

- i. McCloud Sargeant Newsletter*
- ii. Annual Allowances*
- iii. NPCC Letter*
- iv. TPR Results

In relation to item iv detailed discussion emerged regarding the cyber security risks identified in the TPR results. All forces present confirmed they had received reassurance from their scheme providers that processes were in place to minimise the threat of cyber-attack. In addition, GMP and Lancashire reported as follows:-

- GMP: GMP's Information Governance Board had approved the reassurances provided by XPS.
- Lancashire: LCC Internal Audit would be quality assuring LPP's security information as part of their forthcoming audit, however, Lancashire are confident that the measures in place minimise any risks.

The Board agreed that reference to the steps being taken in the North West forces should be included in the correspondence to SAB Chair, Elizabeth France.

Action(s): 11 Fiona Daley and Ian Cosh to include Cyber Security update in correspondence with Elizabeth France, SAB Chair.

6. OPCC Pension Issues

Steve Freeman provided an update on the forthcoming PCC Elections to be held in May 2020 and the potential requirement to brief any new PCCs, should the election result in any changes to the current incumbents.

7. Force Quarterly Returns

Fiona Daley circulated a summary of the region's quarterly return submissions.

KPIs: Discussion was had regarding the definition of some of the KPI terminology to ensure consistency in future returns. In summary the Board agreed the following (number corresponds to the KPI number on the quarterly return):-

1. Pension Accuracy: It was agreed that this would include common data.
2. Payments on Time: All forces to identify their scheme provider KPI as 3 days may not be relevant for all forces.
3. Payment of statutory payments: It was agreed that this would be separated into two parts
3a) Statutory Payments and,
3b) Non statutory payments. Ann Dobinson and Elaine Wilson to provide a definition and aggregate what is to be included in each section

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| 4. Annual Benefit Statements: | No change required. |
| 5. Statutory Reports: | No change required. |
| 6. Deaths in service: | Reword to “within 5 days of receipt of information” |
| 7. Injury Awards: | Reword to “within 5 days of receipt of information” |
| 8. Complaints Resolution: | Agreed this needed to reflect individual force scheme management SLA. |
| 9. General Enquiries: | Agreed this needed to reflect individual force scheme management SLA. |
| 10. System Availability : | To be split into two categories
10a) Scheme Manager availability and, 10b) Self Service Platform availability. |

Action(s) 12 Ann Dobinson (Cumbria) and Elaine Wilson (Merpol) to define definition of statutory payments and what can be aggregated in sections 3a and 3b.

Action(s): 13 Jill Leaver to update the KPI section on the Quarterly Return Pro Forma and circulate with minutes.

Force Risks: As part of the summary Fiona Daley tabled information regarding the individual force risks. The key risks were:-

- Incomplete/inaccurate data (3 forces)
- Process failure/data breach (3 forces)
- Legislative/technical issue associated risk (3 forces)
- Impact of legal cases (2 forces)
- GMP reconciliation (2 forces)
- Cyber attack (1 force)
- Excessive 3rd party charges (1 force)

Discussion was had as to how these may affect the Forces that had identified them. After that it was considered that whilst most of the risks were low they were valid. It was noted by the Board that the impact of the legal cases would pose a significant risk to scheme managers and administrators depending on the remedy.

Breaches: Lancashire reported they had one non-significant breach which had been recorded but had not met the threshold for reporting to the pension regulator.

Pensions Remedy: Concerns were noted that Annual Benefit Statements (ABS) would be implemented prior to any pension remedies from the legal cases being implemented. It was agreed that whilst XPS and LPP (the two scheme administrators operating within the region) would be notified to include a note on all ABSs to inform members that pension remedy was not included, the matter should also be notified to the National Technical Group as it will affect all members in all pension schemes nationally.

Action(s): 14 Fiona Daley to raise awareness of the ABS issue in her communication with Elizabeth France, SAB Chair and ask for it to be raised with National Technical Group

Opt Outs: Merseyside highlighted an issue impacting on their opt out rates whereby employees who had been in higher paid non-policing roles were opting out when they became a police officer and then opting back in when financial parity had been achieved. It was agreed that opt out data needed to be consistent and future returns would be aggregated for all schemes and a split between new recruits and serving officers would also be captured.

Action: 15 Opt Out: Forces to aggregate opt out rates across all schemes and also provide figures for new recruit and serving officer opt out rates.

Forfeiture: It was agreed that future reporting on forfeiture would be for those matters arising within the quarter being reported upon.

Action(s): 16 Forces to report in quarter forfeiture issues.

8. Board Risk Register

The action from the last meeting remained outstanding. This would be progressed and updated following with some of the items discussed in the meeting.

Action(s): 6 refers.

9. Any Other Business

Auto Enrolment: Diane Lister highlighted an issue regarding auto enrolment and the requirement to re-enrol officers when the legislation stated “person” which could have wider implications. It was agreed that all Forces needed to establish what this meant to them.

Action(s): 17 Forces to be explore implications of auto enrolment.

TPR New Relationship Approach: Fiona Daley provided information that TPR would be conducting inspections imminently but Forces has not been identified.

Action Summary:

	Action from previous meeting	Action Owner
1	Timetable of individual Chief Officer visits to be programmed	Fiona Daley/Jill Leaver/Ian Cosh
2	Invite XPS/Keir to attend March 2020 meeting	Jill Leaver
3	Nick Gannon /TPR colleague to attend September 2020	Jill Leaver
4	Amy Park to inform Elizabeth France of the Pension Ombudsman's decision regarding self-referred Forfeiture pension	Amy Park
5	NWPPB to develop forfeiture guidance once the Ombudsman's decision at no. 7 is known.	Fiona Daley
6	Risk Register to include force data quality, cost of administration and benchmarking and pension challenges	Fiona Daley
7	Elizabeth France to obtain an update on Home Office Capability	Elizabeth France
8	Lindsay Atherton to confirm the Federation are happy with the Board's proposal.	Lindsay Atherton
9	Fiona Daley and Ian Cosh to prepare a letter to Elizabeth France, SAB Chair, advising of the Board's preferred option for any pension remedy/ies.	Fiona Daley/Ian Cosh
10	Ch Supt Horn will explore with the Supts. Association branch, the feasibility of arranging a members' information session for scheme provider reps to attend.	Ch Supt Horn
11	Fiona Daley and Ian Cosh to include Cyber Security update in correspondence with Elizabeth France, SAB Chair.	Fiona Daley/Ian Cosh
12	Ann Dobinson (Cumbria) and Elaine Wilson (Merpol) to define definition of statutory payments and what can be aggregated in sections 3a and 3b.	Ann Dobinson/Elaine Wilson
13	Jill Leaver to update the KPI section on the Quarterly Return Pro Forma and circulate with minutes.	Jill Leaver
14	Fiona Daley to raise awareness of the ABS issue in her communication with Elizabeth France, SAB Chair and ask for it to be raised with National Technical Group	Fiona Daley
15	Opt out: Forces to aggregate opt out rates across all schemes and also provide figures for new recruit and serving officer opt out rates.	All Forces
16	Forces to report in quarter forfeiture issues.	All Forces
17	Forces to be explore implications of auto enrolment.	All Forces

Signed by the Chair: Fiona Daley

Quarterly Reports From Forces by:	Agenda Meeting Chair and Vice Chair	Circulation of Agenda and supporting documents, no later than	NW Police Pension Board Meeting	Venue
Monday 11 th May 2020	13.00 Tuesday 5 th May 2020	Wednesday 13 th May 2020	10.00 Wednesday 20 th May 2020	NW Police Benevolent, Langho
Monday 17 th August 2020	13.00 Wednesday 19 th August 2020	Wednesday 26 th August 2020	10.00 Thursday 3 rd September 2020	NW Police Benevolent, Langho
Monday 26 th October 2020**	11.00 Wednesday 21 st October 2020	Wednesday 28 th October 2020	10.00 Thursday 5 th November 2020***	NW Police Benevolent, Langho

NB: Please use the following format for all returns:

“[Force Name] Quarterly Return or Risk Register [Date]”