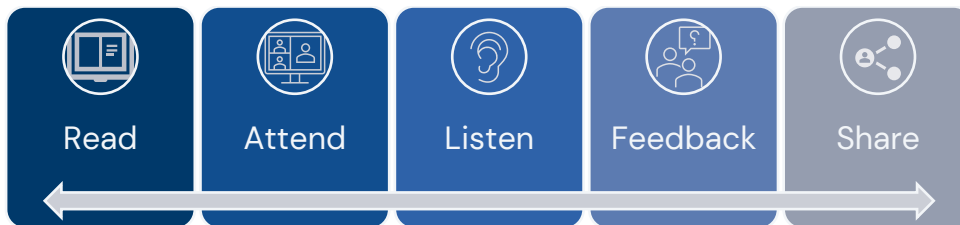


# NPCC Police Pensions Bulletin 15 – 09/01/2025

## Welcome

We would like to welcome all our readers to the NPCC Police Pensions Bulletin number 15. Email [nppcpensions@npcc.police.uk](mailto:nppcpensions@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 plans](#) to your agenda for discussion.
- Ensure the [regular McCloud remedy data requests](#) are 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 RSS cohorts and plans](#).
- Discuss with pension administrator and review [ill health reassessment cases](#), status, RSS issuance and whether further work is needed.
- Complete the monthly return for [RSS reporting](#).
- Complete the quarterly return for [Contingent Decision reporting](#).
- Complete the quarterly return for [Compensation reporting](#).
- Publicise [HMRC's user research request](#).

## Actions for Pension Administrators

- Review the [bulletin actions tracker](#) and complete as necessary.
- Discuss with the scheme manager the [outstanding RSS cohorts](#), your plans for issuance and then email NPCC with details.
- Assist scheme manager with review of [ill health reassessment cases](#), status, RSS issuance and whether further work is needed.

- Provide reports to the scheme manager to enable them to complete the [RSS return](#).
- Consider publicising [HMRC’s user research request](#).
- Confirm details of when the [valuation](#) data was submitted to GAD.
- Consider vacancy on [Administrator Technical Forum](#).

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## New Year message from Julia Mulligan

Julia Mulligan is the Independent Chair of the Police Scheme Advisory Board and she has sent the following message to you.

Since I was appointed Chair of the Police Pension Scheme Advisory Board (SAB) in April 2021, I've identified the challenges for the Board not only as a large and increasing workload connected with remedy, but also a lack of resource in the SAB to deal with it effectively.

The SAB has traditionally met only on four occasions per year, and it is only this year that we have started to meet in person again. I have a range of responsibilities connected with Home Office activities, of which the SAB is only a part, and there is no full-time secretariat.

Despite these challenges, Home Office officials and the NPCC delegate have managed to engage with representatives of the various police staff associations in consultation and dialogue on the process and content of remedy.

We are now just a few months away from 31 March 2025, by which date remedy communication in the form of Remediable Service Statements (RSS) should have been delivered to all eligible members. For immediate choice members this will be to enable them to choose their retirement benefits and in the case of deferred members, to provide details about their benefits and to give details of other important information, including the position on contributions.

Policing has, in comparison to many other public service schemes, made considerable progress on the issue of ABS-RSS as well as IC-RSS' and at this stage there is a high level of confidence that the majority of members will receive the information on time. There remain several issues on which full clarity has not yet been obtained from HMT or HMRC and NPCC and the Home Office team are pressing for these to be resolved urgently.

I am determined in 2025 to reinvigorate the work of the SAB through

1. A renewed engagement with all police staff associations
2. A jointly agreed programme of work on a number of relevant issues where the SAB could make a real and lasting impact –
  - opting out,
  - the level of member contributions
  - communication to members of the value and benefits of membership
  - improving scheme governance and
  - improving the quality of delivery, member experience, information and understanding

These are not exclusive, and I would welcome early dialogue with both staff associations and management representatives on other priorities or issues where they believe the SAB could have a positive and early impact on the scheme.

Finally, I am working with the Home Office to identify ways in which the SAB can be better resourced as a Board to fulfil its statutory obligations and demonstrate its worth to members and the wider group of police stakeholders.

In the meantime, I offer my best wishes to all SAB members and those associated with its work for the year ahead.

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## Bulletin actions tracker

The bulletin was created as a way to formalise instructions for stakeholders and to build knowledge, so that scheme managers could effectively carry out their role of being individually responsible for the management, governance and administration of the local police pension scheme, however over the last few months we have received several requests for some sort of tracker or checklist and it has also been highlighted through different meetings that actions from the bulletins are not always being carried out.

We appreciate that everyone is really busy (we are too!) so we have created a spreadsheet which we will update each month and publish with the bulletin which we hope will maybe make it easier to track actions that need to be dealt with. We do not need or want to see copies of this spreadsheet; it has been created entirely for your own use.

There are four tabs in the [bulletin headings and specific action checklist](#):

Tab	What is it?
Bulletin headings	<ul style="list-style-type: none"> <li>• Provides a link to the K-Hub entry for each bulletin</li> <li>• Gives each heading and sub heading from each issue</li> <li>• Indicates whether there is a specific action for each item and if so, who has the action</li> </ul>
Actions – Pension Board	<ul style="list-style-type: none"> <li>• Lists every specific action that has occurred in each bulletin that is for the local pension board</li> <li>• Provides space to record the owner, add some notes and to enter a date completed</li> </ul>
Actions – Scheme Manager	<ul style="list-style-type: none"> <li>• Lists every specific action that has occurred in each bulletin that is for the scheme manager</li> <li>• Provides space to record the owner, add some notes and to enter a date completed</li> </ul>
Actions – Administrator	<ul style="list-style-type: none"> <li>• Lists every specific action that has occurred in each bulletin that is for the pension administrator</li> <li>• Provides space to record the owner, add some notes and to enter a date completed</li> </ul>

## Latest updates for McCloud remedy

### Issuance of RSS'

I for one am not quite sure how we have reached January 2025 already but what it does mean is that there is less than three months left in which to issue all RSS' by the statutory deadline of 31 March 2025! Eek I hear you cry!

We know that it's been a tough road up to this point and we are also acutely aware that there are still some issues outstanding and yet still more policy decisions and guidance to come, but... a statutory date is a statutory date and despite NPCC and other public service pension schemes making representations to HMT about changing the date and extending it; HMT are not minded to change it and this means that there will be no statutory extension to this deadline.

### **We would therefore urge all scheme managers and administrators to have discussions immediately about: –**

- i. What are the exact numbers of RSS' that are yet to be issued and what are the plans for doing so by 31 March?
- ii. In addition, we recognise that it may not be possible to meet 31 March deadline in all cases, so those discussions should also include the numbers of cases and then split by categories along with a timetabled plan of when they will be issued.

You will know that NPCC has been asking for monthly data returns on various items surrounding remedy for some time, however we do not receive information from all forces or their administrator. This leaves NPCC in the position that they cannot provide an overall national picture of compliance to either the Scheme Advisory Board, the Scheme Managers Steering Group, HMT or any other interested parties.

Once you have this information, pension administrators should send an email with the details to [npccpensions@npcc.police.uk](mailto:npccpensions@npcc.police.uk) asap and no later than 24 January 2025.

We need this information to report to HMT and to enable relevant discussions with the Pension Regulator and the Pensions Ombudsman.

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### Ill Health re-assessment Immediate Choice cases

We would like to remind all scheme managers and pension administrators about ill health reassessment cases, there is no deadline for a re-assessment to happen, but once a member has made their election, it cannot be revisited.

In cases where a reassessment has not taken place, the member has not engaged and or the member has not yet been issued with an RSS, it would be appropriate for the scheme manager to use their discretion under [Section 29\(10\)\(b\)](#) of the PSPJOA 2022 to determine that an RSS can be sent after the statutory deadline of 31 March 2025. This ensures that there is plenty of time to ensure that a member fully understands their choices and options.

If you have members that have not engaged with the process or have refused consent, you may need to consider alternative methods of communication, such as phone calls, TEAMS meeting, in person meeting, as well as any additional support from staff associations, Occupational Health, Family Liaison etc that may be required to ensure that the member understands their choices and what is being asked of them.

In [Bulletin 3](#) and [Bulletin 11](#), we provided both a [note on ill health reassessments](#) and some [suggested template wording](#) to be used. There is also the member remedy factsheet on [ill health retirements](#) on the website which members in this situation should be directed to.

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## Contingent Decisions

### Contingent Decision pause

We wanted to let readers know that although the Home Office have now received the legal advice back from Kings Counsel, there are additional questions that need to be clarified before a timeline and proposed way forward can be put to the sector.

We have made it clear to the Home Office that delays in providing this information are impacting members abilities to retire and are causing frustrations in not being able to process cases. We will provide a further update when we have something that can be shared wider.

### Deadlines for claims to be made

Within the Police Pension Scheme (Remediable Service) Regulations 2023 there are deadline for when Contingent Decision claims can be made and these all hinge on the date that the member is issued their initial RSS document. As RSS' have been sent out at various points over the last year, this will date will vary for member to member.

Scheme managers will need to ensure that this is considered when they are processing claims. There is the ability for scheme managers to use their discretion to accept claims that are later than the specified deadlines, but this should only be used in cases where it can be proved that the member was not aware of contingent decision claims and / or could not have made a claim earlier.

All national template RSS' including the ABS-RSS have a note on the back page about contingent decisions so this should be taken into account by scheme managers.

The deadlines are as follows: –

- For transfers [Regulation 43A\(4\)\(c\)\(i\)](#) states that the deadline is the later of 9 August 2024 or 6 months after the receipt of their first RSS statement.
- For the purchase of additional service [Regulation 29\(3\)\(c\)\(i\)](#) states that the deadline is 12 months after the receipt of their first RSS statement.
- For the purchase of Opted-Out Service [Regulation 6\(3\)\(c\)](#) states that the deadline is 12 months after the receipt of their first RSS statement.
- For honoraria [Regulation 55\(4\)\(b\)\(ii\)](#) states that deadline for a deferred choice member is at the point they retire and receive their options and for immediate choice members, it is at the point they are provided with their IC-RSS.

## GAD guidance – Non-club Transfers Out

On 30 December 2024, an email was sent to all pension administrator lead contacts, software suppliers and to scheme managers to provide a copy of the GAD guidance for applying McCloud remedy to Non-Club Transfers Out. This is available on the [K-Hub](#) and the guidance and factors that are listed in paragraph 1.8 have also been added to the [K-Hub](#).

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## HMRC Digital Service

HMRC are now providing us with regular updates on amendments that they are making to the HMRC Digital Service. These can be found in the [Updates to the Public Service Adjustment Service spreadsheet](#). Changes are grouped and appear on different date tabs for information.

## SDES error codes

HMT have now provided the final version of the error codes that schemes may see via SDES in relation to compensation payments that need to be paid after a member has used the HMRC digital service. The document sets out what the different codes means and what schemes will need to do. The document can be found on the [K-Hub](#).

## User research request

HMRC's digital team are looking for users to help provide feedback and have asked that this request is shared with members to request that they participate in user research to provide feedback directly to HMRC. Please feel free to publicise this where applicable. The request is as follows:

*HMRC is looking for volunteers who are public service pension scheme members to participate in user research to help improve their digital service. Your insights will help ensure the service meets the needs of scheme members, impacted by the Public Service Pension Remedy (also known as McCloud), to check if they have anything to report to HMRC, such as changes to their Annual Allowance (AA) or Lifetime Allowance (LTA) tax charges.*

*Your participation and input would help make a real difference.*

*If you would like to assist with this user research, please register your interest by completing the following form: [Register your interest for participation in PSPR user research](#)*

*HMRC is specifically looking for:*

- *Members of public service pension schemes who are past or present employees of public service organisations, and / or*
- *Those impacted by, or interested in, the Public Service Pension Remedy.*

*If you have any questions regarding this request, or the digital service, please email their user researcher, Praveen Bandaru, at [praveen.bandaru@digital.hmrc.gov.uk](mailto:praveen.bandaru@digital.hmrc.gov.uk)*

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## Remediable service templates

On the 27 September 2024 a Remediable Pension Savings Statement (R-PSS) was issued by email to all administrators, this has now been published to the [Khub](#).

As a reminder all of the remediable service templates are published to the Khub on the following links.

- [Annual Benefit Statement – Remediable Service Statements \[ABS-RSS\]](#)
  - [Deferred ABS-RSS](#)
  - [Immediate Choice – Remediable Service Statements \[IC-RSS\]](#)
  - [Remediable Pension Savings Statements](#)
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## Compensation

The Scheme Manager Steering Group (SMSG) chaired by Chief Constable Jeremy Vaughan are keen to understand the quantum and issues arising from compensation claims to enable them to help NPCC define what, if any, kind of service might need to be procured for the longer term.

Therefore, each quarter we will be requesting details of the compensation claims that you have received to help with this discovery work.

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## 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](mailto:npccpensions@npcc.police.uk).

### RSS monthly reporting

The [RSS monthly data request](#) for RSS' issued in December 2024 is now due, **please remember to include the numbers of ABS-RSS' issued (A-DC-RSS for ABS-RSS and D-DC-RSS for a DBABS-RSS).**

### Contingent Decision quarterly reporting

The [Contingent Decision quarterly request](#) for Q3 2024/25 is now due.

## NEW: Compensation quarterly reporting

The compensation claims that you have received in Q3 of 2024/25 are now due. Please can you complete the [compensation quarterly request](#) for your force as soon as possible.

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## Police Pension Website

### News page

- [8 January 2025 – Letter to HMRC about self-assessment deadlines](#)  
A copy of a joint letter between NPCC and NFCC to HMRC about the issues for members who need to self-assess but have not received a PSS.
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## Valuation

Scheme managers and administrators will be aware that the deadline for submitting valuation data to GAD was 1 December 2024.

In the last bulletin we asked all administrators to let us know when their valuation data was submitted to GAD. To date we have only received one response. If you have not yet provided this information to us, please can you do so ASAP by sending an email to [npccpensions@npcc.police.uk](mailto:npccpensions@npcc.police.uk) to confirm the date of either when you did make your submission, or the date that you plan to make your submission if you have not yet been able to do this.

Where data was or will be submitted after the deadline, it would be helpful if you could also explain the reasons for this.

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## Pensions Dashboards

As part of Claire's role on the Pensions Dashboard Advisory Group (PDAG), later this month, NPCC will be meeting with the Head of Money and Pensions Policy and the Senior Policy and Propositions Manager from the Money and Pensions Service (MaPs) to discuss their plans about how they intend to show McCloud remedy data on the Pensions Dashboard. This will enable us to talk through our ABS-RSS designs and our concerns about how this will be displayed to members.

### AVCs

We are aware that there are some members that have AVCs with either Utmost Life and Pensions or Standard Life, during January, we will be meeting with representatives from both providers to ascertain plans for their AVC data and plans to stage this to the Pensions Dashboards.

This will enable us to establish which administrators have members with AVC plans and to ensure that there is joined up working where applicable.

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## Technical queries

If you have a query that you want to raise with the NPCC Police Pensions Team, please send your completed [Technical Query form](#) by email to [npccpensions@npcc.police.uk](mailto:npccpensions@npcc.police.uk) we can then ensure that the query is picked up by the most appropriate team member.

## Non-Club Transfers In

We have received a query about factors for a Non-Club transfer where it needs to be accepted into the PPS 2006. GAD have confirmed the following: –

The vast majority of non-Club transfers in from 1 April 2022 should be received into the 2015 Scheme, as this is the scheme in which all members are actively accruing benefits. This is why the legacy scheme TV-in factors were removed following the 2023 factor review.

However, there are select cases where transfers in will need to be accepted into the legacy schemes. In line with the Public Sector Transfer Club, for transfers where a member transfers from Scheme A to Scheme C (where both Scheme A and Scheme C are public service pension schemes) with more than a 5 year break between the sending and receiving schemes (but has not had a continuous break of more than 5 years in active membership of a public service scheme, because they had been a member of Scheme B, also a public service pension scheme, in between A and C) the transfer will be a non-Club transfer but would still entitle the member to a final salary link where the conditions in Schedule 7 of the Public Service Pensions Act 2013 are met.

We expect that these “A to B to C” cases will be few and far between and therefore should be referred to GAD (via Home Office) for provision of the appropriate factor. Removing them from the standard factors list was intended to make sure that business as usual transfers in were not mistakenly admitted to the legacy schemes.

Should you receive any of these cases, then you will need to email the details to the Home Office in the first instance – [policefirepensionsteam@homeoffice.gov.uk](mailto:policefirepensionsteam@homeoffice.gov.uk) to request the relevant factors, and please copy [npccpensions@npcc.police.uk](mailto:npccpensions@npcc.police.uk) in so that we can keep track / escalate if necessary.

## Other useful updates

### Consultation draft response – Inheritance tax on pensions

We are pleased to include a draft of the [technical consultation on Inheritance Tax on Pensions](#). A final version will be published to K-Hub when it is available.

## Useful links

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

## Meeting updates

### Administrator Technical Forum

We have a vacancy for an administrator colleague to join this forum. If you work for an administrator and would like to be considered, please send an email to [npccpensions@npcc.police.uk](mailto:npccpensions@npcc.police.uk).

### 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
<b>Pensions chat</b> Previous session slides on <a href="#">K-Hub</a>	<ul style="list-style-type: none"> <li>9 January 2025 at 2.30pm – First Actuarial to discuss the Home Office consultation on the member contribution structure review</li> <li>30 January 2025 at 2.30pm*</li> <li>13 February 2025 at 2.30pm*</li> </ul>
<b>Scheme Advisory Board (SAB)</b>	<ul style="list-style-type: none"> <li>14 January 2025 10.30am to 2.30pm</li> <li>1 April 2025 10.30am to 2.30pm</li> <li>10 July 2025 10.30am to 2.30pm</li> <li>14 October 2025 10.30am to 2.30pm</li> </ul>
<b>Scheme Manager Steering Group (SMSG)</b>	<ul style="list-style-type: none"> <li>23 January 2025 10.15am to 11.45am</li> <li>3 March 2025 3pm to 4.30pm*</li> </ul>
<b>Remedy Implementation Working Group</b> All papers and action log on <a href="#">K-Hub</a>	<ul style="list-style-type: none"> <li>22 January 2025 3pm to 4.30pm</li> <li>4 March 2025 10am to 11.30am*</li> </ul>
<b>Pensions Dashboard Working Group</b> All papers and action log on <a href="#">K-Hub</a>	<ul style="list-style-type: none"> <li>9 January 2025 2pm to 3.30pm</li> <li>20 February 2025 2pm to 3.30pm*</li> </ul>
<b>Administrator Technical Forum</b> All papers and action log on <a href="#">K-Hub</a>	<ul style="list-style-type: none"> <li>13 January 2025 2pm to 3.30pm</li> <li>18 March 2025 10am to 11.30am*</li> </ul>
<b>Single Scheme Manager: Local Arrangements Project Board</b>	<ul style="list-style-type: none"> <li>27 January 2025 2.30pm to 4pm</li> <li>10 March 2025 1.30pm to 3pm*</li> </ul>

N.B. \*Until invites are set out, dates and times for meetings may be subject to change.

## Contacts

Role	Name	Email address
Head of Police Pensions	Clair Alcock	<a href="mailto:Clair.alcock@npcc.police.uk">Clair.alcock@npcc.police.uk</a>
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Police Pension Advisor	Claire Neale	<a href="mailto:Claire.neale@npcc.police.uk">Claire.neale@npcc.police.uk</a>
Technical queries	NPCC Pensions Team	<a href="mailto:npccpensions@npcc.police.uk">npccpensions@npcc.police.uk</a>