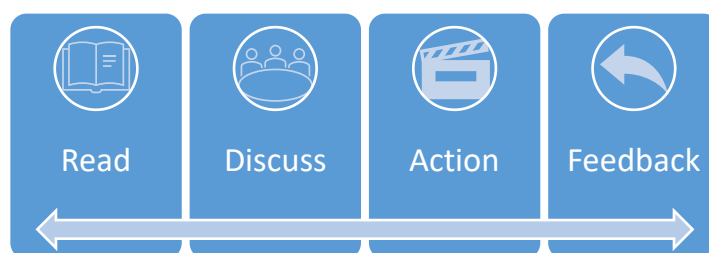


FPS Bulletin 98 – October 2025

Welcome to issue 98 of the Firefighters' Pensions Schemes bulletin.

We would encourage you to read this bulletin, taking note of and carrying out any relevant actions. This may entail escalating items, alerting colleagues where necessary, and circulating and discussing this bulletin in other forums including but not limited to others within your FRAs i.e. HR or Finance colleagues, Local Pension Boards and third-party administrators/payroll providers.



If you are looking for information on a certain topic, issue and content indexes are held on the [main bulletin page](#) of the website and are updated following each new issue.

If you have any comments on this bulletin, suggested items for future issues, or a job you would like to advertise, please email bluelightpensions@local.gov.uk.

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Calendar of events

Please see below a calendar of upcoming events relevant to the Firefighters' Pension Schemes. Only those events which are hyperlinked are currently available to book. If you have any events you would like to be included in a future bulletin, please email bluelightpensions@local.gov.uk.

Table 1: Calendar of events

Event	Date
-------	------

<u>FPS Coffee Morning</u>	11 November 2025 26 November 2025
FPS Technical Working Group	24 November 2025
SAB	11 September 2025 11 December 2025
FPS Communications Working Group	29 January 2026 7 April 2026 21 July 2026 15 October 2026
<u>Local Pension Board training</u>	<u>22 January 2026</u> (MS Teams)
LPB Chair Forum	To be confirmed for 2026
Administrator Forum	10 November 2025 8 December 2025
LGA FRA drop-in session	21 November 2025 23 December 2025

Actions arising

Scheme Managers

[Updated HMRC Offsetting of Unauthorised Payments Reporting Template and Guidance](#): should make the necessary people aware of the updated template and guidance.

[Matthews case update and new template](#): must ensure staff processing Matthews cases are familiar with the manual cases note, and that appropriate checks against it are completed for each case processed.

Where cases are to be submitted the process and secure Egress portal described in the note *must* be used. Care should also be taken that all required information is included and clearly set out when referring cases. Incomplete or poorly labelled information is likely to increase the time needed by GAD to respond to these cases.

[Training and Development](#): are encouraged to:

- allow their employees to attend the relevant training on offer, where it will help with their role and ongoing development.
- inform us of any specific areas of pensions training that they would like to see.

Administrators

[Updated HMRC Offsetting of Unauthorised Payments Reporting Template and Guidance](#): should ensure they are using the most up to date version of the reporting template and ensure the guidance document is followed.

Local Pension Boards

[Local Pension Board Training Sessions](#): are encouraged to book onto the relevant session for them

Age Discrimination Remedy updates

Q2 25/26 McCloud Compensation Claims - DELTA Opens 01 Oct (Firefighters Remedy Compensation Grant July-September 2025)

On 1 October 2025, MHCLG [emailed](#) all Claim Certifiers to confirm that the compensation claim period had opened and the deadline for submissions is **31 October 2025**.

Updated HMRC Offsetting of Unauthorised Payments Reporting Template and Guidance

HMRC has created some additional guidance on how to report to HMRC any offsetting used for unauthorised payment top-ups. The guidance includes a description of what HMRC are expecting for each individual data item, along with an updated version of the offsetting of unauthorised payments spreadsheet template.

The guidance and updated template can be found in this [Age Discrimination Remedy – Useful Information](#) section in the member-restricted area of the FPS Regulations and Guidance website.

HMRC has asked that you do not remove any columns when completing the template. If the column is not applicable to the member you are reporting, please leave this blank.

The spreadsheet can be used for:

- 1) Reporting the top-up and any offsetting in the same period
- 2) Report the top-up only, if you have not used the offsetting process yet (top-up will be fully taxed and no offsetting will apply)
- 3) Report the use of offsetting after reporting the top-up in a previous period (a credit will be issued for any overpaid tax)

If you are reporting the top-up and offsetting in separate periods, please provide a reason for this. If you find that the spreadsheet does not support one of the three scenarios to report a change in a member's unauthorised payment tax position, please get in contact with HMRC at publicservicepensionsremedy@hmrc.gov.uk.

ACTION: Scheme managers should ensure the necessary people are made aware of the updated template and guidance, and administrators should ensure the newest version of the offsetting template is being used and ensure the guidance document is followed.

Matthews exercise updates

Project Implementation Data request – Thanks!

All 44 FRAs in England provided a response to the Matthews implementation survey request published in the September bulletin. This is the first time since the start of the Matthews second options exercise that all FRAs have responded to the implementation survey. This is especially timely as GAD will use this data to inform their review of Employer Contribution Rates to apply from April 2027. GAD and LGA appreciate the efforts of all FRAs for their responses to the implementation survey this quarter and throughout the exercise.



Manual case update and new template

GAD has updated the [Matthews manual cases note](#) to extend the list of 'Cases to be referred to GAD'. The straightforward pension amount calculation included in the Matthews 2 calculator does not cover more complex pension calculation scenarios. The manual cases note now explicitly states that Cases for pensioner members who are subject to a Pension Sharing Order, Earmarking Order or Tax Charge Debits (Scheme Pays) should be referred to GAD.

ACTION: Scheme managers must ensure staff processing Matthews cases are familiar with the manual cases note, and that appropriate checks against it are completed for each case processed.

Where cases are to be submitted the process and secure Egress portal described in the note *must* be used. Care should also be taken that all required information is included and clearly set out when referring cases. Incomplete or poorly labelled information is likely to increase the time needed by GAD to respond to these cases.

FPS

General technical query log

The [current log of queries and responses](#) can be accessed by practitioners in the member-restricted area of the FPS Regulations and Guidance website. The queries have been anonymised and divided into topics. The log is updated monthly in line with the bulletin release dates.

Queries have been answered this month in the following categories:

- Ill Health retirement
- Injury
- Contribution banding

Matthews and Age discrimination remedy Query logs

We have three query logs:

- Age Discrimination remedy technical query log
- Matthews technical query log
- Matthews GAD calculator query log

The technical query logs can be accessed by practitioners in the restricted area of the FPS regulations and guidance website under the sections '[Age Discrimination remedy technical queries](#)' and '[Special members of the FPS 2006 technical queries](#)'. The Matthews GAD calculator query log can be accessed through the tab 'Calculator query log' in the Special members of [FPS 2006 - GAD calculator](#) section of the FPS Regulations and Guidance website.

The logs are updated monthly in line with the bulletin release dates.

As a reminder if you have a query relating to either the [Age Discrimination remedy](#) or [Matthews](#) GAD calculators you can email GAD using their dedicated inboxes

FirePoliceMcCloudTaxInterest@gad.gov.uk

Firematthewscalculator@gad.gov.uk

Training and Development

Training and Development

Details of our training sessions are included on the [Training and Development](#) section of the [FPS regulations and guidance](#) website. The section sets out the training topics, dates that are available and how to book.

If there are any specific areas of training that you would like to see, please let us know via bluelightpensions@local.gov.uk or be part of our training working group.

ACTION:

Scheme managers are encouraged to:

- allow their employees to attend the relevant training on offer, where it will help with their role and ongoing development.
- inform us of any specific areas of pensions training that they would like to see.

Local Pension Board (LPB) Training Sessions

Details of the LPB training sessions are included on the [‘Training and Development’](#) section of the [FPS Board](#) website. The section sets out the dates that are available and how to book.

ACTION:

Readers are asked to make their LPB members aware of the training sessions and encourage them to book onto a session.

Events

FPS coffee mornings

Our MS Teams coffee mornings are continuing in November 2025. The informal sessions lasting up to an hour allow practitioners to catch up with colleagues and hear a brief update on FPS issues from the LGA Bluelight team.

We are pleased to include the presentations from recent sessions below:

7 October 2025 [GAD update – Matthews Project Implementation data](#)

[Bluelight Commercial – Pensions Framework update](#)

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28 October 2025 [Matthews Amendments – Readiness, compensation and litigation](#)

If you do not already receive the meeting invitations and would like to join us, please email bluelightpensions@local.gov.uk. Please note that attendance at the coffee mornings is generally restricted to FPS practitioners and managers.

FPS England Scheme Advisory Board (SAB) updates

SAB website

You can use the links below to find out about the latest updates on the work of the SAB and its committees on the SAB website:

- [SAB membership](#)
- [SAB meeting and agenda papers](#)
- [Committee meetings and agenda papers](#)

Other News and Updates

Pensions Dashboards Programme



Dashboard Programme – Publications

PDP publish regular [publications](#) about the Pensions Dashboards and the Programme which you can find on their [website](#).

MoneyHelper pensions dashboards testing – update

The next stage of pensions dashboards testing began in October, with a low volume of individuals using a real dashboard with real pensions data. This is in line with the [Pensions Dashboards Programme's \(PDP\) approach to consumer testing](#).

You can find out more about pensions dashboards testing:

- in the [PDP blog on dashboards and consumer testing](#)
- in PDP Principal Chris Curry's [blog on testing the MoneyHelper dashboard](#)
- by watching the [2 minute video on using a dashboard for the first time](#).

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The Pensions Regulator (TPR)



Pensions dashboards webinar

The Pensions Regulator (TPR) is holding a free dashboards webinar at 2.30pm on 3 December 2025. The purpose of the webinar is to prepare schemes for dashboards duties.

TPR expects FRAs to connect by 31 October 2025, in line with the date set in DWP guidance. [Find out more about the TPR winter pensions dashboards webinar](#) and book your place online.

Public Sector Scheme Return

The Pensions Regulator (TPR) sent scheme return notices to managers of public service pension schemes in October 2025. TPR used the contact information in the online [Exchange](#) service to contact scheme managers.

Scheme managers must complete the return within six weeks of receiving the scheme return notice. This is a legal requirement.

There are no new questions in this year's scheme return. The section previously called 'Record keeping' has been updated to reflect the general code and TPR's expectations. This section is now called 'Scheme member data quality'.

Find out more about the [Public service scheme return](#) on TPR's website.

At this month's FRA drop-in session we discussed whether incomplete Matthews records should be included within the data scoring. It is LGA's view that this should be included as this represents the current position of the data. We will be informing TPR of the position for the sector, so that they take this into account when considering the sectors returns.

The Pensions Ombudsman

TPO determination on pension liberation

In a recent determination (CAS-78486-R9D8), the Deputy Pensions Ombudsman (DPO) did not uphold a complaint concerning pension liberation.

In 2015, Mrs T transferred her defined benefit pension to a small self-administered scheme that turned out to be a pension liberation scheme. The complaint she

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brought against the scheme that made the transfer included the view that she did not meet the definition of an 'earner' as set out in section 181 of the Pension Schemes Act 1993.

The DPO held that a member does have a right to transfer credits, whether or not they were an earner at the time of the transfer. This view does not follow the 2016 decision in Hughes v Royal London, in which the High Court ruled that a member must be in receipt of earnings to qualify for a statutory transfer, but those earnings do not have to come from the employer sponsoring the scheme they are transferring to.

You can read more on the Pension Ombudsman (TPO) website:

- [DPO determination Mrs T, CAS-78486-R9D8](#)
- [TPO statement on High Court decision in Hughes v Royal London](#).

PASA

PASA guidance on AI in pensions administration

On 28 October 2025, the Pensions Administration Standards Association (PASA) published new [guidance on the use of AI in pensions administration](#). The guidance provides practical support for schemes to understand the opportunities and risks of adopting Artificial Intelligence (AI) in pension administration.

You can find out more about the guidance in the [PASA press release](#).

PASA accreditation showcase webinar

PASA is running a webinar on 5 November 2025 from 12.30 to 1.30 pm covering PASA accreditation. You can [find out more about the webinar and book your place](#) online.

Useful links

- [The Firefighters' Pensions \(England\) Scheme Advisory Board](#)
- [FPS Regulations and Guidance](#)
- [FPS Member](#)
- [FPS1992 guidance and commentary](#)
- [The Pensions Regulator Public Service Schemes](#)
- [The Pensions Ombudsman](#)
- [HMRC Pensions Tax Manual](#)
- [LGA pensions website](#)
- [LGPS Regulations and Guidance](#)
- [LGPC Bulletins](#)
- [LGPS member site](#)
- [Scottish Public Pensions Agency - Firefighters](#)
- [Welsh Government Fire circulars](#)
- Pensions Dashboards
 - [TPR guidance and checklist](#)
 - [DWP guidance on connection](#)
 - [PASA connection readiness guidance](#)

Contact details

Update your contact details

Readers will be aware that we carried out an exercise to update your contact details in [FPS Bulletin 76 – December 2023](#).

Going forward if you need to update your contact details, please complete the [contact details form](#) and return to bluelightpensions@local.gov.uk.

Raising a query

If you have a technical query, please complete the 'query form', that is available on the [member area](#) of the FPS regulations and guidance website and email bluelightpensions@local.gov.uk and one of the team's Firefighters' pension advisers will get back to you. To avoid delays in receiving a response, please avoid emailing advisers directly.

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While every attempt is made to ensure the accuracy of the bulletin, it would be helpful if readers could bring any perceived errors or omissions to the attention of the Bluelight team by emailing bluelightpensions@local.gov.uk.