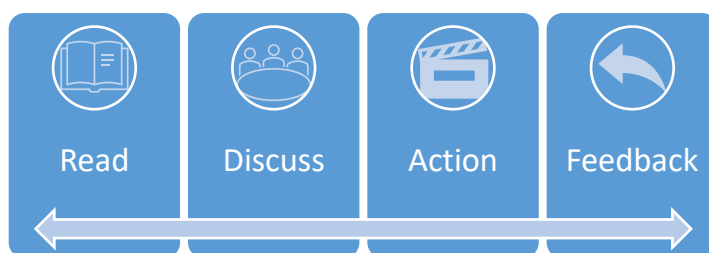


FPS Bulletin 99 – November 2025

Welcome to issue 99 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.

Contents

Calendar of events	2
Actions arising	4
Scheme Managers.....	4
Administrators.....	4
Local Pension Boards.....	4
Age Discrimination Remedy updates	5
Matthews Remedy updates	5
Manual cases.....	5
FPS	5
2025/2026 AME Funding	5
General technical query log	6
Matthews and Age discrimination remedy Query logs	6
Training and Development	6
Training and Development.....	6
Local Pension Board (LPB) Training Sessions	7

Events	7
FPS coffee mornings	7
FPS England Scheme Advisory Board (SAB) updates	8
SAB website	8
Other News and Updates	8
Budget 2025	8
PASA publishes new data quality guidance and a data improvement plan template.....	9
PASA Issues guidance on digital transformation	9
Deputy Ombudsman clarifies ‘transfer credits condition’	10
Pensions Dashboards Programme	11
Dashboard Programme – Publications	11
PDP marks one year to go until dashboard connection deadline	11
PDP dashboards webinar – 10 December 2025.....	12
PDP blog on data quality	12
The Pensions Regulator (TPR)	12
Enforcement strategy consultation – LGA response	12
TPR publishes revised data quality guidance	13
TPR blog on pension scams	14
HMRC	14
Managing Pension Scheme service: HMRC has published a YouTube video on enrolling and migrating to the serviceUseful links	14
Contact details	15
Update your contact details	15
Raising a query.....	15
Copyright	16
Disclaimer	16

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
FPS Coffee Morning	2 December 2025
FPS Technical Working Group	25 March 2026 20 May 2026 18 August 2026 26 November 2026
SAB	11 December 2025 18 March 2026 17 June 2026 16 September 2026 9 December 2026
FPS Communications Working Group	29 January 2026 7 April 2026 21 July 2026 15 October 2026
Local Pension Board training	22 January 2026 (MS Teams) Starting in May 2026, this training will be delivered over two days, with each session lasting two hours. May 2026 5 May 2026 – Day One 7 May 2026 – Day Two September 2026 22 September 2026 – Day One 23 September 2026 – Day Two January 2027 28 January 2027 – Day One 29 January 2027 – Day Two Refresher Training 31 March 2026 7 July 2026 8 October 2026 The links to book these events will be made available next week at: Training and Development

LPB Chair Forum	15 January 2026 20 March 2026 14 May 2026 15 July 2026 18 September 2026 17 November 2026
Administrator Forum	8 December 2025 Dates to be confirmed for 2026
LGA FRA drop-in session	23 December 2025 23 January 2026 23 February 2026 23 March 2026 23 April 2026 21 May 2026 23 June 2026 23 July 2026 21 August 2026 25 September 2026 23 October 2026 23 November 2026 23 December 2026

Actions arising

Scheme Managers

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.

TPR publishes revised data quality guidance: are encouraged to review the data quality guidance.

Administrators

Deputy Ombudsman clarifies 'transfer credits condition': are recommended to update your transfer discharge forms to occupational pension schemes to reflect this case.

Local Pension Boards

Local Pension Board Training Sessions: are encouraged to book onto the relevant session for them

Age Discrimination Remedy updates

Unauthorised Payment's HMRC Offsetting Guidance

On 13 November 2025, we [emailed](#) scheme managers, internal pensions, finance and administrator contacts to inform them that HMRC had published their unauthorised payments offsetting guidance on the .GOV.UK website.

Matthews Remedy updates

Manual cases

GAD have made us aware that several individuals involved in the Matthews exercise, who's cases fall into the manual case category, have started to contact GAD directly.

Please can we encourage FRAs to manage the messaging regarding these cases, to avoid individuals contacting GAD directly.

Whilst we are aware that it is frustrating that these cases are taken longer than was anticipated, we are working directly with MHCLG and GAD to understand the timescales involved.

FPS

2025/2026 AME Funding

Fire and Rescue Authorities (FRAs) have already received advance AME funding for FY 2025/26 to support the implementation of both the Matthews and McCloud remedies. This funding was included in the AME pension top-up grant paid in July 2025.

MHCLG has previously confirmed that it is prepared to make an additional AME pension top-up payment during FY 2025/26 if any FRA experiences cashflow challenges directly related to implementing the Matthews and/or McCloud remedies. If your FRA requires extra interim AME funding this year, please contact MHCLG directly with your request.

Please note:

- Any request for additional AME funding must include evidence showing that the uplifted funding provided in the July 2025 AME pension top-up grant is insufficient for your projected spend in FY 2025/26.
- Any additional AME grant paid will be offset against the next AME pension top-up grant scheduled for July 2026.

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:

- Tax implications for active members who reach age 75

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

Following reflection and feedback from the sector, as discussed in our coffee morning '[What's worked, What's Next; Fire sector training 2025-2026](#)', we are pleased to confirm that we will be continuing with our training programme and adding some additional topics, including:

- Scheme manager training

Later in 2026 we will also be adding training on:

[Click here to return to Contents](#)

- Discretions
- Pensions Tax

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. We will be adding the dates for 2026 in the next week.

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

Following reflection and feedback of the 2025 LPB training sessions we have chosen to split the full training into two sessions:

Session one will cover governance and an overview of the Firefighters' Pension Scheme history.

Session two will cover hot topics i.e. Matthews, Sargeant and Pension Dashboards.

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, and we are pleased to have added the 2026 dates.

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 December 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:

11 November 2025 – [What's Worked, What's Next – Fire Sector Training 2025 - 2026](#)

26 November 2025 – [Pensions Ombudsman ruling](#)

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

Budget 2025

On 26 November 2025, Rachel Reeves, Chancellor of the Exchequer, delivered the [Budget 2025](#).

Points of interest for scheme managers include:

- **Inheritance tax:** The Budget document reaffirms the Government's intention to proceed with previously announced proposals to include certain unused pension funds and death benefits within the estate for inheritance tax (IHT) purposes for deaths after 5 April 2027. On the same day as the Budget, the Government also published a [policy paper on the proposals](#). This sets out that the Government will introduce a mechanism for personal representatives (PRs) to direct pension scheme administrators to withhold 50 per cent of taxable benefits for up to 15 months from the date death, where the PRs expect IHT to be due.

Other pension-related announcements include:

- confirmation of next year's increase to the basic and new State Pension

[Click here to return to Contents](#)

- a commitment to maintain the triple lock for the duration of the current Parliament
- amendments to the rights of overseas residents to top up their State Pension by paying class 2 voluntary national insurance contributions
- measures to ease the administrative burden for pensioners whose sole income is the basic or new State Pension without increments, so they will not need to pay small amounts of tax via simple assessment from 2027–28, even if the State Pension exceeds the personal allowance.

PASA publishes new data quality guidance and a data improvement plan template

Following the publication of TPR’s revised data quality guidance, the Pensions Administration Standards Association (PASA) published new data quality guidance and a data improvement plan template through its Data Working Group. These resources help pension schemes respond to TPR’s revised member data guidance.

TPR’s revised guidance asks schemes to check member data against six key dimensions: accuracy, completeness, consistency, timeliness, uniqueness and validity. PASA’s guidance explores each dimension and provides practical detail on how schemes can assess and improve the quality of member data across these areas.

The accompanying data improvement plan template provides schemes with a structured framework to plan, document and deliver data improvement activity. It can be adapted to suit each scheme and helps trustees, administrators and advisers set up clear, auditable data improvement processes.

For more details, and links to the guidance, read [PASA’s press release](#).

PASA Issues guidance on digital transformation

On 23 November 2025, PASA released the first part of a new three-part guidance series from its Digital Administration Working Group.

The publication ‘Delivering Effective Digital Transformation’ offers practical guidance for pension schemes embarking on, or progressing through, digital transformation. It outlines how schemes can establish the right frameworks, technologies and cultural mindset to ensure successful and sustainable digital change.

The next part of the series will be published in January 2026. It will provide actionable strategies and planning frameworks for delivering digital transformation, regardless of scheme size or digital maturity.

For more details and to access the full guidance, see [PASA’s press release](#).

Deputy Ombudsman clarifies ‘transfer credits condition’

The Deputy Pensions Ombudsman has published a decision that clarifies how the ‘transfer credits condition’ under the Pension Schemes Act 1993 should be interpreted.

Under the Act, a statutory transfer to an occupational pension scheme must meet the ‘transfer credits condition’. This means the member must acquire transfer credits in the receiving scheme. Transfer credits are defined as rights allowed to an earner under the rules of an occupational pension scheme, based on a transfer.

In a 2016 case of *Hughes v Royal London*, the Court considered the ‘transfer credits condition’. In particular, whether the member needed to be an earner from a sponsoring employer of the receiving scheme, or whether earnings from any source would suffice. The Court ruled that earnings from any source would meet the condition.

The Judge in the *Hughes* case also raised the possibility of interpreting the ‘transfer credits condition’ differently. In paragraph 26, the Judge suggested that the condition might refer to ‘rights which have the character of rights which were allowed to persons who were earners but without requiring the individual applicant for a transfer of the cash equivalent to be himself or herself an earner.’ However, as neither party supported this interpretation, the Judge did not rule on it.

The member had transferred their pension from the HBOS Final Salary Pension Scheme to the Bodhyfrd Road 1967 Ltd Small Self-Administered Scheme (SSAS) in 2015. The member argued that the transfer should not have occurred because they had no earnings from any source at the time, and therefore the ‘transfer credits condition’ was not met.

The Deputy Ombudsman dismissed this argument, ruling that the condition was met. They agreed with the Judge’s comments in *Hughes*, supporting the interpretation that the condition is based on the character of the rights acquired, rather than the member’s earnings status. Their full reasoning is set out in paragraphs 59 to 76 of the decision.

In paragraph 73.3, it says:

‘Read as referring to a type of right, the definition is meaningful as it limits the type of rights that can be acquired on a transfer to those that could be acquired by an earner and, for instance, excludes short term pensions or other rights allowed to dependants or other persons and rights not allowed under an occupational pension scheme’.

The Deputy Ombudsman further ruled that the ‘transfer credits condition’ was met in this case because ‘the rights granted...were consistent with those that could be accrued by ‘earners’, including both earners and self-employed earners under the SSAS as a registered pension scheme.’

This decision confirms that members transferring to an occupational pension scheme

do not need to have earnings from any source to meet the 'transfer credits condition'. However, it is important to note that since 2021, transfers to occupational pension schemes must now establish an employment link to a sponsoring employer of the receiving scheme under the Occupational and Personal Pension Schemes (Conditions for Transfers) Regulations 2021.

Administrators may wish to adjust their discharge forms for transfers to occupational pension schemes. The forms will likely ask the receiving scheme to confirm that the member's transfer value accepted by 'the Scheme' will be used to provide transfer credits for the member. We recommend expanding this statement to include the following:

“Transfer credits are defined in section 181 of the Pension Schemes Act 1993. This means the type of rights that could be acquired by earners under the rules of the Scheme.”

ACTION

Administrators are recommended to update your transfer discharge forms to occupational pension schemes to reflect this case.

Pensions Dashboards Programme



Dashboard Programme – Publications

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

PDP marks one year to go until dashboard connection deadline

On 31 October 2025, the Pension Dashboards Programme (PDP) marked one year until the legal deadline for all pension schemes to connect to the dashboard. To highlight this milestone, PDP released a [short video](#) showing the progress made so far and stressing the need to keep up momentum as the deadline approaches.

Schemes that are due to connect and have questions or need support should contact PDP as soon as possible.

To reinforce this message, PDP issued a [press release](#) on 3 November 2025.

PDP dashboards webinar – 10 December 2025

PDP is hosting a webinar on Wednesday 10 December from 11am to 11.45am. This is an opportunity to hear about the latest updates on pensions dashboards.

The webinar will be hosted by a panel of experts including Chris Curry from PDP, Adam Gifford from MoneyHelper and Lucy Stone from TPR. Participants will also be able to ask questions at the end of the session.

For more information and to secure your place, please visit the [webinar registration page](#).

PDP blog on data quality

On 21 November 2025, the PDP published a [blog called 'Getting data-ready for dashboards: benefits for savers and schemes'](#).

The blog highlights the importance of having high-quality, accurate, and complete member data for dashboards. It explains how high-quality data enables better matching of records, reduces administrative burdens and enhances the overall user experience.

The blog also features comments from TPR, which expand on how improving data readiness can unlock significant opportunities for members, pension providers, schemes and the wider pensions industry. In addition, TPR reiterates the potential consequences for schemes that fail to invest in data quality.

The Pensions Regulator (TPR)



Enforcement strategy consultation – LGA response

On 11 November we [published](#) a response on behalf of the LGA to TPR's consultation on its proposed enforcement strategy.

The response broadly supports TPR's approach, welcoming its agile, risk-based and preventative framework. However, it calls for greater transparency in enforcement decision-making and clearer success metrics to measure effectiveness.

TPR ran [the consultation](#) from 16 September to 11 November 2025.

[Click here to return to Contents](#)

TPR publishes revised data quality guidance

The Pensions Regulator (TPR) has released [revised member data guidance](#), bringing all its data-related resources together in one place.

The revised guidance sets out clearer expectations for schemes and includes best practice examples to help improve data management capability. The guidance explains how:

- scheme managers are ultimately accountable for data quality, even if tasks are delegated to administrators
- scheme managers must ensure regular data assessments, review reports, and submit accurate data scores in their scheme return
- scheme managers should have a clear data management strategy, allocate resources for improvements, and challenge service providers where standards are not met.

The revised guidance follows TPR's [recent report on its regulatory initiative](#), which targeted schemes at risk of falling short on data quality standards. Through this initiative, TPR asked schemes to demonstrate compliance, encouraged improvements, and gathered insights to refine its communications and guidance. The key findings include:

- while most schemes have made progress on cleansing personal data for dashboards, value data, used to calculate benefits, is often overlooked
- improvement plans are frequently informal or fragmented, and trustee engagement ranges from proactive oversight to near-complete reliance on administrators
- controls and trustee focus vary widely. In many cases, administrators lead data assessments with limited trustee scrutiny.

TPR is now scrutinising the data preparations of the UK's largest schemes and will expand its engagement in 2026. scheme managers need to be ready to demonstrate how they are maintaining their member data in line with legal requirements and TPR expectations. Schemes unable to demonstrate compliance may face formal intervention, including improvement notices.

ACTION

Scheme managers are encouraged to review the revised data quality guidance

TPR blog on pension scams

On 27 November 2025, TPR published [a blog about pension scams](#). This blog marks an important milestone: the fifth anniversary of TPR's 'Pledge to Combat Pension Scams'.

The blog also accompanies recent updates to the pledge and the launch of a new campaign. In the blog, TPR reflects on the significant progress the pensions industry has achieved over the past five years, examines the challenges that remain, and sets out the way forward.

HMRC

On 27 November 2025, HMRC published their [Pensions schemes newsletter 175 – November 2025](#), which includes the following updates:

- **Budget 2025:** A summary of the main pension-related announcements from the Budget.
- **Speculation about Budget changes:** HMRC asks schemes to remind members about the risks of early access to pensions. If schemes identify new schemes entering the market that offer access to pension savings in ways that raise concern, they should report them to pensions.compliance@hmrc.gov.uk.
- **'Check your pension protections' service:** The service has been renamed 'Check your pension protections and enhancements'. Individuals can now view all protections and enhancements online and submit amendments to some protections online.
- **Reporting QROPS transfers:** Later this year, the Managing Pension Schemes service will include a new feature allowing schemes to report transfers to a Qualifying Recognised overseas pension scheme (QROPS) to HMRC.

Managing Pension Scheme service: HMRC has published a YouTube video on enrolling and migrating to the service

Useful links

- [The Firefighters' Pensions \(England\) Scheme Advisory Board](#)
- [FPS Regulations and Guidance](#)
- [FPS Member](#)
- [Khub Firefighters Pensions Discussion Forum](#)
- [FPS1992 guidance and commentary](#)
- [The Pensions Regulator Public Service Schemes](#)
- [The Pensions Ombudsman](#)

[Click here to return to Contents](#)

- [HMRC Pensions Tax Manual](#)
 - [LGA pensions website](#)
 - [LGPS Regulations and Guidance](#)
 - [LGPS 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.

Clair Alcock (Head of Pensions)

Telephone: 07464 532613

Email: clair.alcock@local.gov.uk

Claire Johnson (Senior Firefighters' Pensions Adviser)

Telephone: 07920 861 552

Email: claire.johnson@local.gov.uk

Tara Atkins (Firefighters' Pensions Adviser)

Telephone: 020 7664 3031 (Teams Direct Dial)

Email: Tara.atkins@local.gov.uk

[Click here to return to Contents](#)

Jill Swift (Firefighters' Pension Adviser)

Telephone: 0203 838 4845 (Teams direct dial)

Email: jill.swift@local.gov.uk

Suzanne Williams (Programme Support Officer)

Telephone: 0207 664 3198

Email: Suzanne.williams@local.gov.uk

Copyright

Copyright remains with Local Government Association (LGA). This bulletin may be reproduced without the prior permission of LGA provided it is not used for commercial gain, the source is acknowledged and, if regulations are reproduced, the Crown Copyright Policy Guidance issued by HMSO is adhered to.

Disclaimer

The information contained in this bulletin has been prepared by the Bluelight Pensions team, part of the Local Government Association (LGA). It represents the views of the team and should not be treated as a complete and authoritative statement of the law. Readers may wish, or will need, to take their own legal advice on the interpretation of legislation. No responsibility whatsoever will be assumed by the LGA for any direct or consequential loss, financial or otherwise, damage or inconvenience, or any other obligation or liability incurred by readers relying on information contained in this bulletin.

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.