

LPB training 2020

Using governance to support the scheme manager

December 2020

Complexity

SAB [report](#)

73% administrators believe the scheme to be complex or very complex

66% of FRAs find decision making difficult

61% of members who responded only partly or don't understand their benefits.

TPR Survey

84% of responses believe the complexity of the scheme is a barrier to improvement



Age Discrimination / Immediate Detriment

Matthews (Special Members Second Options Exercise)

Pensionable Pay

Ill-Health

Government Direction on Remedy

1. How should the transitional provisions be made lawful going forward?
2. How do you compensate members who have been subject to those provisions since 1st April 2015

[Dedicated age discrimination page](http://www.fpsregs.org) on www.fpsregs.org

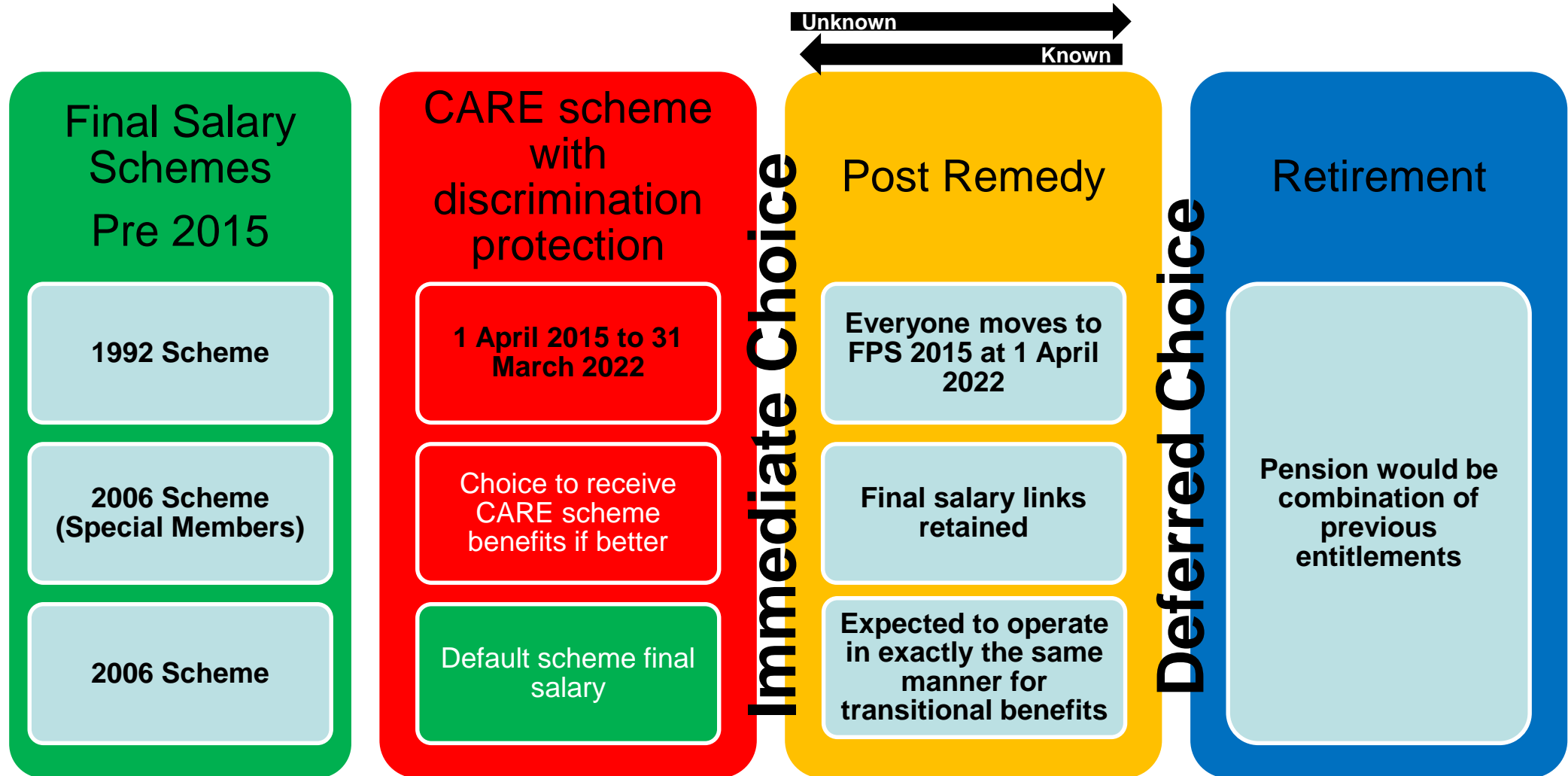
Written Statement – [HCWS187](#)

- The government is developing proposals to address the unlawful age discrimination identified by the Court of Appeal in the 2015 reforms to the Judicial and Firefighters' pension schemes.
- On 15 July 2019, the government announced it would take steps to **remove this discrimination retrospectively** (HCWS1725). It confirmed that this would apply to pension scheme members with relevant service across all those public service pension schemes that were introduced in 2014 and 2015, regardless of whether individuals had made a claim. This is a complex undertaking, and it is important to get it right.
- Since February 2020 relevant pension schemes have been conducting technical discussions with member and employer representatives to seek initial views on the government's high-level proposals for removing the discrimination.
- I am grateful for the constructive engagement of trade unions, staff associations, public service employers and other stakeholders in these discussions. The government is considering the initial views of stakeholders and continuing to work through the details of the technical design elements of the proposals. Detailed proposals will be published later in the year and will be subject to public consultation. The government will welcome views on these proposals.
- For the avoidance of doubt, **members of public service pension schemes with relevant service will not need to make a claim** in order for the eventual changes to apply to them.
- I would like to reassure members that their pension entitlements are safe. The proposals the government is considering would allow relevant members to **make a choice** as to whether they accrued service in the legacy or reformed schemes for periods of relevant service, **depending on what is better for them**. The government will provide more detail later in the year, but if an individual's pension circumstances change as a result, the government may also need to consider whether previous tax years back to 2015-16 should be re-opened in relation to their pension.
- The government will also set out its proposal to **remove the discrimination for future service** in the forthcoming consultation.
- In January 2019, the government announced a pause to the cost control mechanism in public service pension schemes, due to uncertainty about benefit entitlements arising from the McCloud judgment. Alongside its proposals for addressing discrimination, the government will also provide an update on the cost control mechanism.

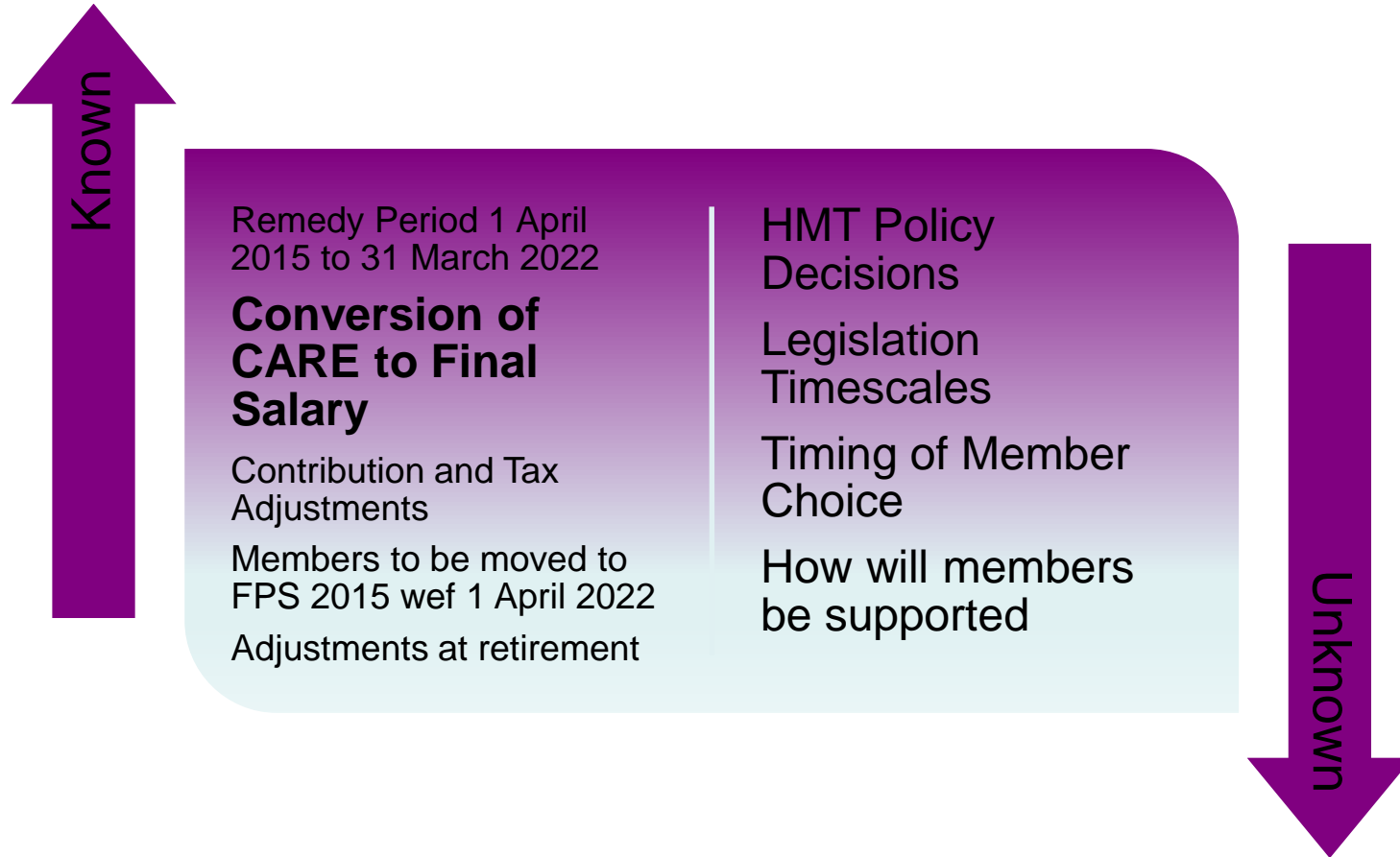
Consultation launched 16 July 2020

The formal HMT consultation was published on 16 July 2020 with a closing date of 11 October 2020. The paused employer cost-cap process will also resume. The consultation and associated documents are available below.

Document	Doc type	Date
Public Service Pensions Consultation and Update: written statement HCWS380	(HTML)	16 July 2020
Public Service Pensions Consultation	(PDF, 74 pages, 851kb)	16 July 2020
Public Service Pensions Consultation - questions	(PDF, 2 pages, 97.7kb)	16 July 2020
Public Service Pensions leaflet	(PDF, 3 pages, 63.1kb)	16 July 2020
Public Service Pensions Equality Impact Assessment	(PDF, 38 pages, 378kb)	16 July 2020
Update on Cost Control Element of the 2016 Valuations	(PDF, 2 pages, 95.8kb)	16 July 2020
Home Office McCloud - Sargeant consultation FAQs	(PDF, 5 pages, 215kb)	16 July 2020
GAD technical bulletin - Public Service Pensions update	(PDF, 3 pages, 376kb)	July 2020
Home Office immediate detriment note	(PDF, 6 pages, 830kb)	21 August 2020
Stakeholder information note on HMT consultation proposals	(PDF, 8 pages, 240kb)	1 October 2020
LGA response to the HMT consultation on changes to the transitional arrangements of the 2015 Public Service Pension Schemes.	(PDF, 23 pages, 285kb)	9 October 2020
SAB England response to the HMT consultation on changes to the transitional arrangements of the 2015 Public Service Pension Schemes.	(PDF, 65 pages, 741kb)	9 October 2020
SAB Wales response to the HMT consultation on changes to the transitional arrangements of the 2015 Public Service Pension Schemes.	(PDF, 9 pages, 425kb)	9 October 2020
SAB Scotland response to the HMT consultation on changes to the transitional arrangements of the 2015 Public Service Pension Schemes.	(PDF, 11 pages, 274kb)	9 October 2020

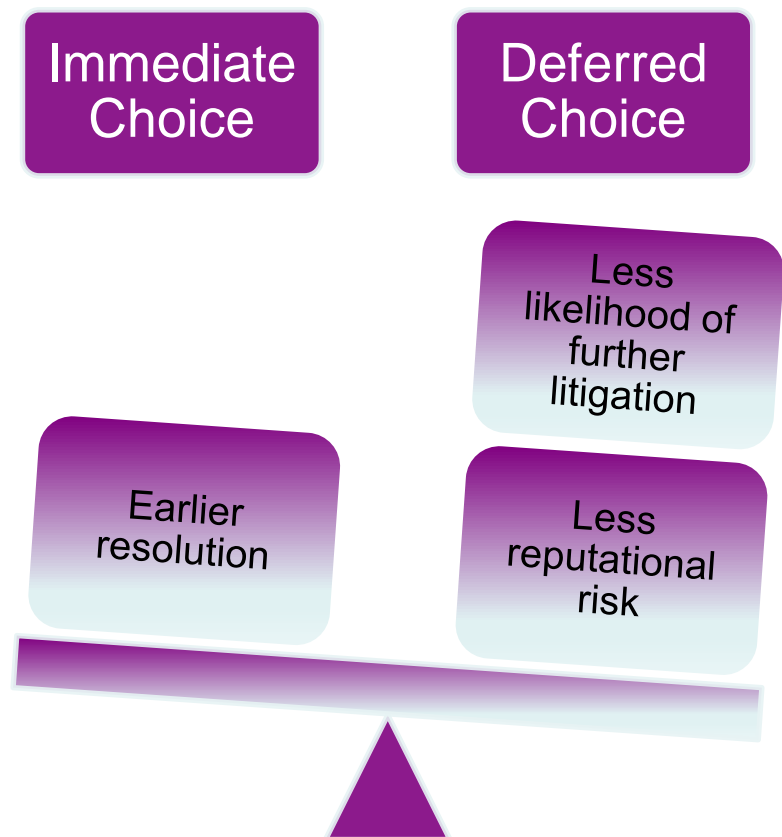


Moving Forward

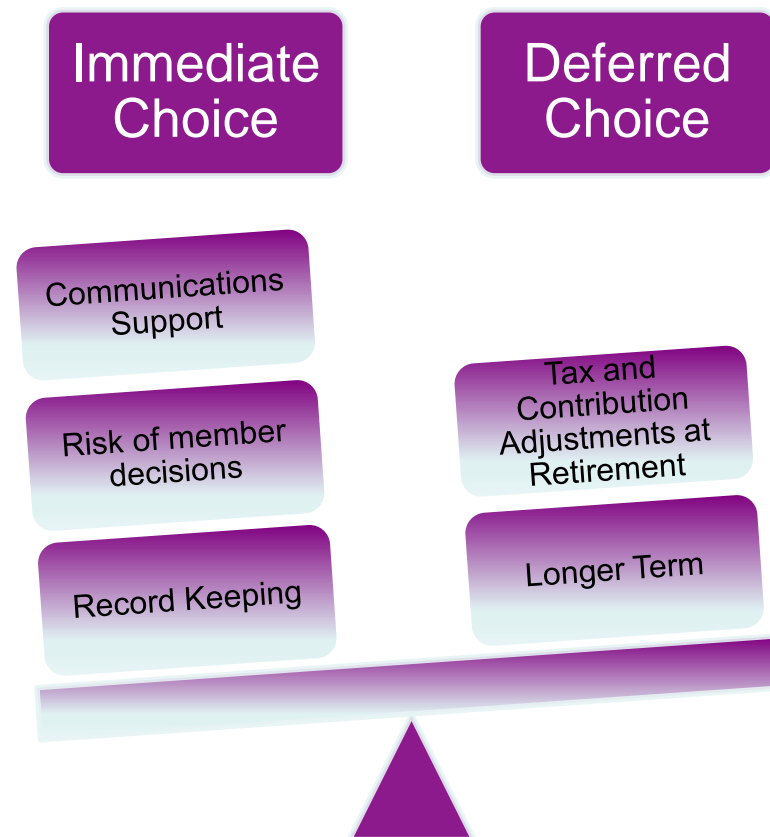


Pros and Cons of either approach

Pros



Cons



SAB Preference for DCU



Mitigates risk



Proposed defaults for FPS 2006 to default to FPS 2015 for remedy period.



Possible opportunity for members to make indicative choice

Immediate Detriment

- [Note](#) issued by Home Office on 21 August
 - [Information note](#) issued by LGA
 - Issues raised by the note that FRAs will need to consider.
 1. Legal Status and Powers to apply
 2. Technical issues not resolved by guidance
-

Matthews



Special Members of FPS 2006



Case raised by O'Brien that service should be bought back to start date of employment.



Likely second options exercise



Scope still being considered by legal parties

Pensionable Pay decision making

- It is a matter for each FRA to determine what is and isn't pensionable taking into account their contractual arrangements, the regulations and all relevant case law.
 - When making any pensionable pay decision, the reasoning for that decision and what case law has been considered should be documented
-

Blackburne Principles

Case Law

- [Kent and Medway Towns Fire Authority v Pensions Ombudsman and anor, \[2001\] OPLR 357](#)
- [Norman v Cheshire Fire & Rescue Service, \[2011\] EWHC 3305 \(QB\)](#)
- [Booth v MWWFRA \[2019\] EWHC 790](#)

Payment should be calculated in accordance with a firefighter's ordinary rate of pay.

Payment must be 'pay' for work done under the contract of employment.

Payment must be regular in nature, i.e. should be pay to which the firefighter is entitled at the rate applicable to rank / role.

It must not be one-off, as a result of an extraordinary event.

It must have something of a permanent nature.

Why is it not clear?

- The Firefighters Pension Scheme 1992 requires pay to be determined in relation to the 'performance of the duties of the role'. Under case law (Blackburne) there has to be an '**element of permanency**'.
 - The Firefighters Pension Scheme 2006 and the Firefighters Pension Scheme 2015, which are virtually identical, requires pay to be determined in relation to the performance of the duties of the role but in addition the the regulations specifically exclude an '**allowance or emoluments paid on a temporary basis**'.
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Dedicated area for resources

Resources

Guides, workshop slides, and other communications are listed in the table below. While some documents are archived and no longer endorsed by the LGA or the Home Office, they continue to provide useful historical background.

Document	Description	Date of issue
Pensionable pay resource factsheet (PDF, 3 pages, 285kb)	Factsheet reinforcing basic principles that should be taken into account when making pensionable pay decisions and highlighting guidance and resources available to assist decision makers	July 2020
Pensionable pay workshop 2019 (PDF, 87 pages, 3,084kb)	Presentation slides from the event held at 18 Smith Square on 18 July 2019	July 2019
Pensionable pay factsheet (Booth v MAWW) (PDF, 9 pages, 611kb)	Guidance to FRAs on the Booth v MAWW High Court judgment concerning the treatment of four specific elements of pay as pensionable or otherwise	May 2019
FPS - pensionable pay update (PDF, 15 pages, 293kb)	AGM 2018 update from Weightmans	September 2018
Pensionable pay workshop 2016 (PDF, 67 pages, 3,051kb)	Presentation slides from the event held at 18 Smith Square on 20 July 2016	July 2016
FPC10(2): Consultation response (PDF, 5 pages, 31kb)	Firefighters' Pension Committee response to consultation on treatment of pay for pension purposes	March 2010
FPSC 11/2009: Definition of pensionable pay (PDF, 8 pages, 312kb)	FPSC circular setting out concerns about the treatment of pay for pension purposes and inviting comments on options for amending pension arrangements	December 2009
FPC09(4): Pensionability of emoluments and allowances (PDF, 8 pages, 50kb)	Firefighters' Pension Committee paper seeking comments on proposals for dealing with the pensionability of allowances paid to members of the FPS	May 2009
Rule G1: Pensionable pay and average pensionable pay (PDF, 8 pages, 64kb)	CLG archive commentary on Rule G1 of FPS 1992	June 2008

Regulations

The consolidated regulations for each scheme relating to pensionable and final pay are listed below.

Rule	Description	Scheme
G1	Pensionable pay (PDF, 5 pages, 210kb)	FPS 1992
Part 11, Chapter 1, Rule 1 & 2	Pensionable pay and final pensionable pay (PDF, 4 pages, 182kb)	FPS 2006
17	Pensionable pay (PDF, 1 page, 171kb)	FPS 2015

Ombudsman determinations

The Pensions Ombudsman (TPO) determinations with specific reference to pensionable pay have been collated below.

Reference	Determination	Date	Scheme
PO-21552 (PDF, 10 pages, 2,580kb)	Not upheld	20/11/2019	FPS 1992
PO-14863 (PDF, 16 pages, 5,280kb)	Partly upheld	02/10/2018	FPS 1992
PO-15584 (PDF, 12 pages, 272kb)	Upheld	22/02/2018	FPS 2006
PO-11867 (PDF, 5 pages, 189kb)	Not upheld	11/01/2017	FPS 1992
PO-3511 (PDF, 24 pages, 165kb)	Not upheld	13/08/2014	FPS 2006
PO-120 (PDF, 14 pages, 193kb)	Not upheld	17/01/2014	FPS 1992
PO-2023 (PDF, 4 pages, 135kb)	Not upheld, appeal dismissed	04/10/2013	FPS 1992
N01150 (PDF, 8 pages, 165kb)	Not upheld	08/03/2006	FPS 1992
K00521 (PDF, 6 pages, 100kb)	Upheld	22/03/2001	FPS 1992

Ill-Health

- Ill-health is a combination of pension and workforce practice
 - There are three stages to actioning medical retirement, these are;
 1. Employment Law considerations, and consideration of re-deployment opportunities, this is traditionally managed by HR.
 2. IQMP opinion
 3. Retirement and Termination and calculation of benefits
-

Two Tiers of Ill-Health

Lower Tier

The firefighter must be **permanently incapable** of performing the role of firefighter

References to permanency mean to Normal Retirement Age

- 1.FPS 1992 = 55
- 2.FPS 2006 Special = 55
- 3.FPS 2006 & FPS 2015 = 60

Higher Tier

The Firefighter must be incapable of performing regular employment

Regular Employment: means employment for at least 30 hours a week on average over a period of not less than 12 consecutive months.

IQMP assessment criteria

- 1.FPS 1992 At date of assessment
- 2.FPS 2006 & FPS 2015 permanently incapable of regular employment until normal pension age = 60

Common cause of IDRPs

- Using the wrong IQMP form
 - Not considering redeployment until after the IQMP decision
 - Not scrutinising the IQMP decision properly
-

Governance

Assurance rather than
reassurance

- **Reassurance:** when someone you trust tells you that all is well
- **Assurance:** when someone you trust tells you what's happening; shows you the evidence; encourages questions and constructive challenge; and allows you to judge for yourself if everything's fine

Understand the risks

To be informed and knowledgeable

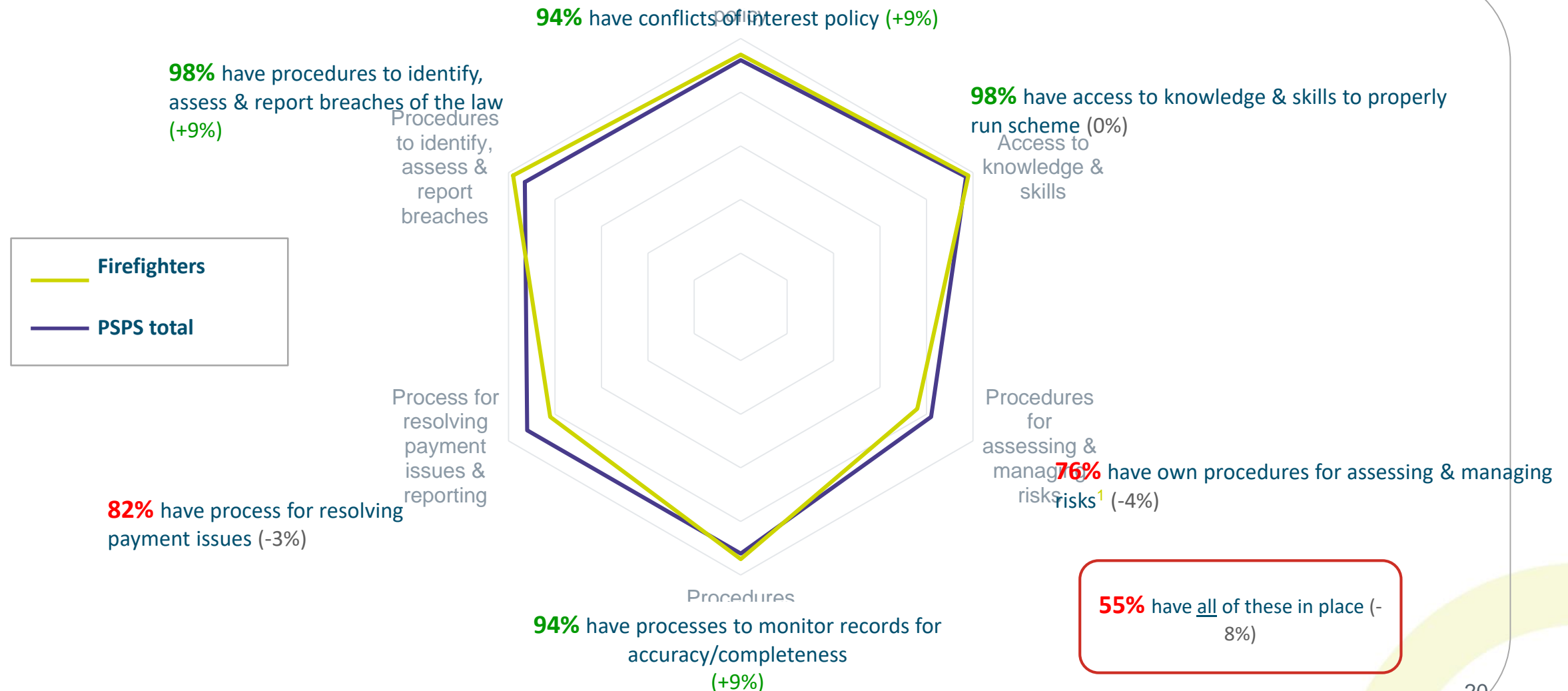
Understand the data

Collect the right money at the right time

What to do when something goes wrong

Act without conflict

Key Features



TPR Governance and Administration Survey Results

[TPR Governance and Administration survey.](#)

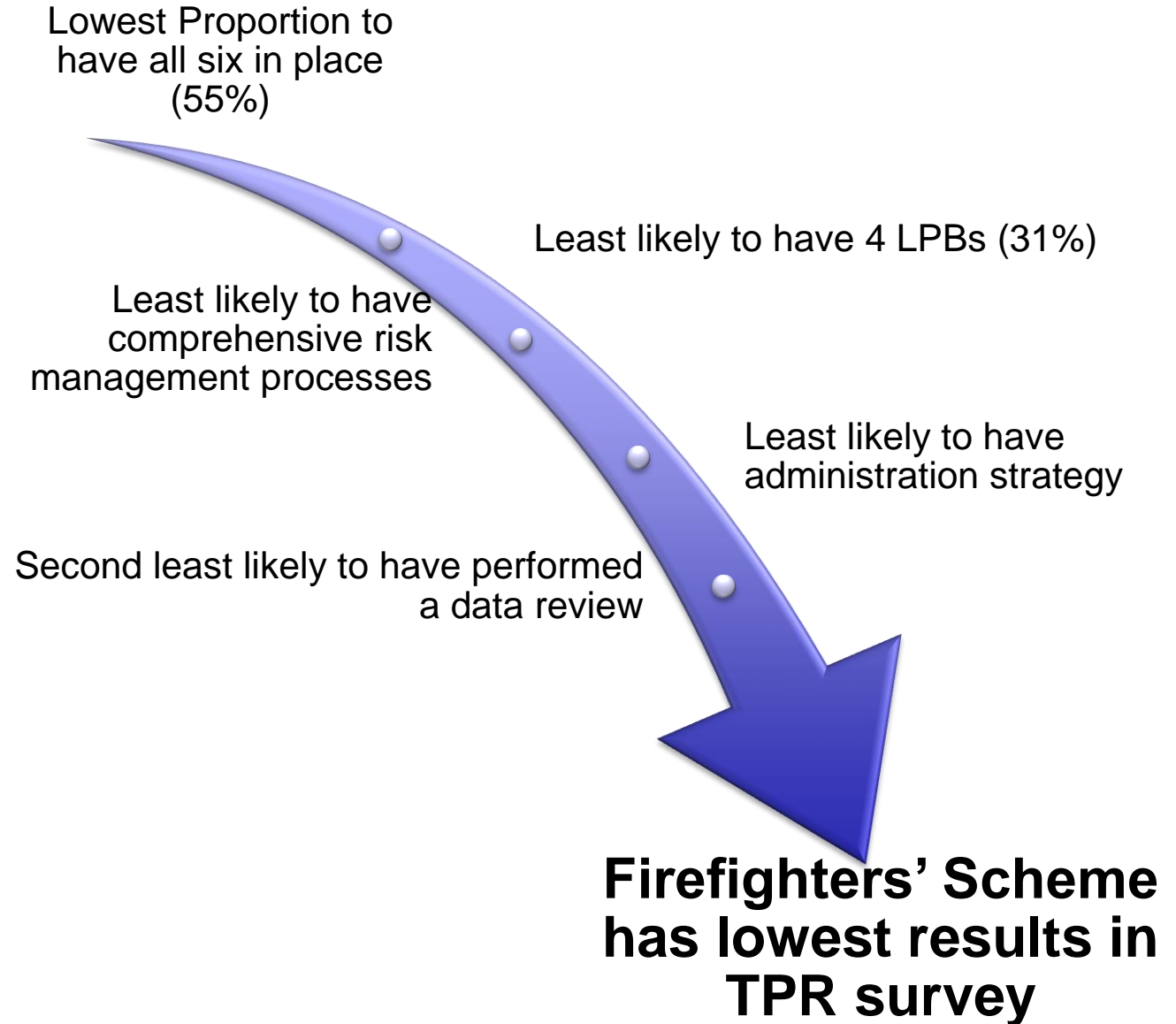
The McCloud judgment was identified as a top barrier (51 per cent) to improving governance and administration.

The Firefighters' scheme was more likely to cite time issues (22 %) and resource issues (16 %) as a barrier to automating the scheme processes.

More complaints entered the IDRPs system than other schemes, but fewer were upheld. Ill-health eligibility was the most common type of complaint.

Complexity of the scheme was the most commonly identified barrier for the Firefighters' schemes (84 per cent).

The Firefighters' Scheme was noted to have the highest proportion of annual benefit statements delivered in line with statutory deadlines (67 per cent)



Code of Practice 14

- **Governing your scheme**
 1. Knowledge and Understanding
 2. Conflicts of Interest and Representation
 3. Publishing Information about managing schemes
 - **Managing Risks**
 4. Internal Controls
 - **Administration**
 5. Scheme Record-keeping
 6. Maintaining Contributions
 7. Providing Information to Members
 - **Resolving Disputes**
 8. Internal Dispute Resolution
 9. Reporting Breaches of Law
-

<u>Understand Risk</u>	<u>Informed and Knowledgeable</u>	<u>Understand the Data</u>	<u>Collect the money at the right time</u>	<u>What to do when something goes wrong</u>	<u>No Conflicts of Interest</u>
4. <u>Internal Controls</u>	1. <u>Knowledge and Understanding</u>	3. <u>Publishing information about schemes</u>	6. <u>Maintaining Contributions</u>	9. <u>Reporting Breaches of Law</u>	2. <u>Conflicts of Interest and Representation</u>
	7. <u>Providing information to members</u>	5. <u>Scheme Record Keeping</u>			
	8. <u>Internal Dispute Resolution</u>				

What are the risks?

Risk

- **At the 2019 survey 76% of Firefighters' Pension Schemes reported to have documented procedures for assessing and managing risk**
- **The TPR research report 2018 commented that Fire schemes were less likely to have risk management processes than other schemes.**
- **Is the risk register relevant and regularly assessed?**
- **The TPR survey shows those without risk registers record lower performance.**

Risk registers vs performance

	Risk register	No risk register
Have a documented policy to manage pension board members' conflicts of interest	95%	86%
Have a register of pension board members' interests	95%	86%
Held at least 4 board meetings in last 12 months	36%	0%
Evaluate knowledge, understanding and skills of the board at least annually	90%	57%
Have a succession plan for members of the pension board	55%	14%
Have documented procedures for assessing and managing risk	86%	14%
Reviewed exposure to new/existing risks at any board meetings (1+) in last 12 months	100%	57%
Completed a data review in last 12 months	90%	71%
Identified any issues in latest data review	85%	40%

Age Discrimination: Deferred Choice Underpin



Risk considered the biggest factor in supporting DCU



Resources available to support immediate choice both at officer FRA level and administration



Risk about the levels of technology and information available to support decision making



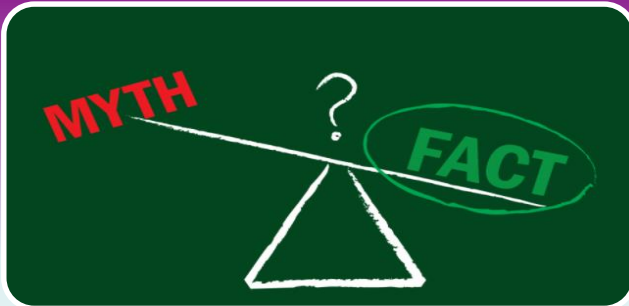
Risk of knowledge being available



Risk of members making wrong decisions



Member Decisions



Overcoming
myths



Social
media
'facts'



Missing
Information

Risk of Choice

Choice has been historically hard to implement and invariably led to challenge across Fire and Police.

61% of members who responded to [SAB Fire \(England\) review](#) in 2019 only partly or don't understand their benefits.



[PO-16555](#)

- 2006 options exercise
- Option to move to 2006 thereby claiming partners pension was not exercised
- Members unmarried partner was left without a pension



[PO-23014](#)

- Uprating of widows pension (pre 1972)
- No record found of election to pay for a full half rate pension
- Query raised 40 years after the event!



[PO-22496](#)

- Special member FPS 2006 options exercise
- Deadline missed by member, options window closed by statute

Risk of undocumented / inconsistent decision making

**T
A
X**

Pensionable Pay

Eligibility

FRA decision making

IDRPs

**Flexibility
Savings
Operational
People
Risk v demand**

Abatement

Re-employment

Dual contracts

Ill-Health

Who is the risk register for?

- It is the Local Pension Board's statutory responsibility to assist the scheme manager in ensuring compliance, therefore the responsibility for risk sits with the **scheme manager**, and it is for the board to ensure there is suitable mitigation of risk in the form of a risk register and procedures.

How do you manage and recognise risk?

- How does your scheme make decisions
- Do you know where to get advice?
- How do you assess risk?
- Key personnel
- Administrator resilience
- What Internal Controls are there?
- Are the [stakeholder relationships](#) at the right level
- How do you monitor [IDRPs](#) [[SAB IDRPs Paper](#)]

Known areas of risk

Compliance	Two Pensions Scheme Sanction Charge Pensionable Pay
Cost of rectifying mistakes	From FRA Operating account Regulations do not give guidance on correcting errors Reputational
Legal Cases	Age Discrimination Retained Firefighters access to the scheme prior to July 2000
Breaches	Record vs Report
Capacity	Administrator Key person risk

To be informed and
knowledgeable

Skills and Knowledge

- No change between 2018 & 2019, 98% of Firefighters' Pension Schemes report to have procedures to enable access to all the knowledge, understanding and skills necessary to properly run the scheme.
- However when asked what was a main barrier to improvement,



35% cited a lack of resources or time



31% cited training and retention of staff and knowledge

TPR Assessment Tool

Results

Using this report

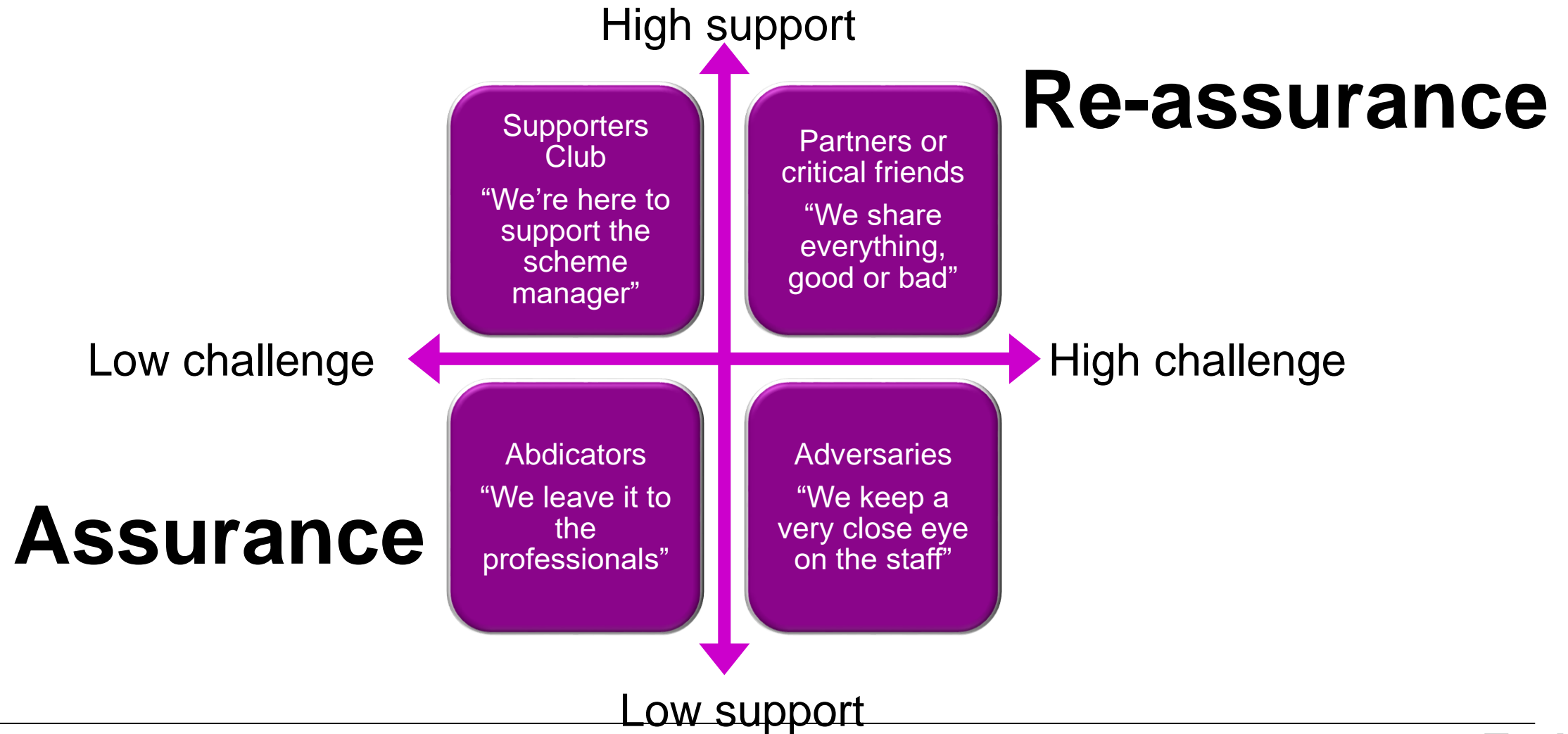
In this report we have provided an indicative risk rating for each answer you selected, alongside some guidance and links to additional information. This report does not provide an assessment of compliance with the law – it indicates areas that might be of particular concern and where you may wish to focus. You should seek legal advice where required.

To minimise the risk of non-compliance with the law, you should conduct a comprehensive review of your scheme against the requirements set out in the legislation and the guidance provided in our code of practice. Statistics refer to findings from TPR's 2015 survey into the Governance and Administration of Public Service Schemes.

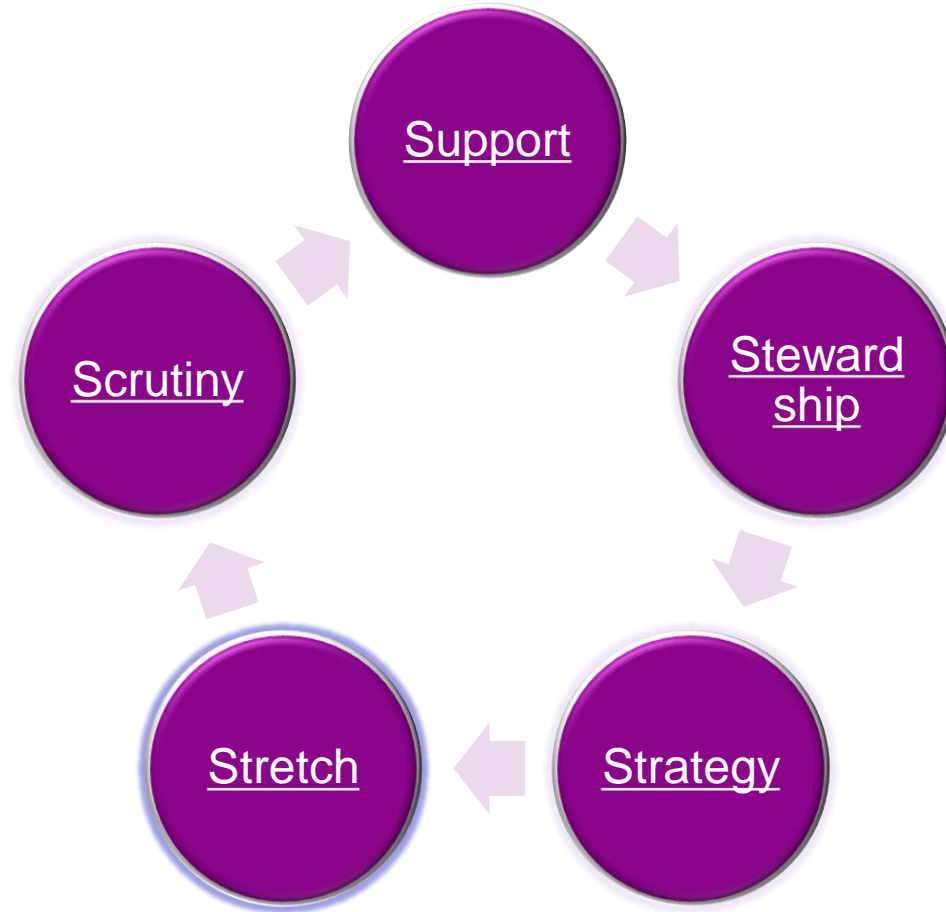
A summary of your results



Getting where you want to be...



Encourages questions and constructive challenge



Support

- To encourage, a critical friend asks;
 - Have you got what you need to do that?
 - We ought to celebrate that?
 - Encourages questions and constructive challenge

Six core principles

1. Assess and mitigate your risks
2. Encourage knowledge and skills
3. Know your data
4. Collect the right money at the right time
5. Record and report when something goes wrong
6. Act without conflict

Stewardship

- To protect and conserve their assets; a critical friend acting to guard access to knowledge and a good name says;
 - How can we preserve that knowledge so that we can still learn from it in five years time?
 - If a resource was removed would a risk be introduced?
 - How would we cope if.....
 - What do we expect

Six core principles

1. Assess and mitigate your risks
2. Encourage knowledge and skills
3. Know your data
4. Collect the right money at the right time
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Strategy

- Before making big decisions, critical friends listen to what others have to say, consult experts and their stakeholders, and then say;
 - Where could we be in five years time?
 - What do we want to achieve?
 - What are other people doing?
 - Where can we gain access to resource / knowledge

Six core principles

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Stretch

- To challenge and improve an organisation, critical friends say;
 - How can we improve?
 - Why are we doing ...
 - What best practice is there?
 - Have we thought of doing it differently?

Six core principles

1. Assess and mitigate your risks
2. Encourage knowledge and skills
3. Know your data
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6. Act without conflict

Scrutiny

- Critical friends that are scrutinising or examining processes say;
 - What alternatives did you consider and why?
 - What regulations or case-law did you use to make your decision and why?
 - Have you followed guidance
 - What is someone else doing?

Six core principles

1. Assess and mitigate your risks
2. Encourage knowledge and skills
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Understand the data

Firefighter Pension Schemes

FPS 1992	FPS 2006 (Standard Members)	FPS 2006 (Special Members)	FPS 2015	Compensation Scheme	Remedy
Protected standard members	Protected standard members	Protected special members	2015 only	Benefits based on service	Pay
	Protected retained members	Special Members (Pre 2000)	1992 transitional	Protections for retained firefighters with a qualifying injury before 1 st April 2014	Contributions
			2006 standard transitional		Service
			2006 standard retained transitional		Final salary
			2006 special transitional members		Opt-outs

What priority do you put on data?

- **94% of Firefighters' Pension Schemes reported to have a process to monitor membership types on an ongoing basis to ensure they are complete and accurate, an increase of 9% in the year**
- **However, the mean per cent of employers that provided timely, accurate and complete data fell for the Firefighters' scheme, which is a disappointing for a single employer scheme.**
- **76% submitted data monthly and electronically, albeit it was noted this had risen since 2018.**
- **What processes do you have in place to improve data?**

Remedy Data

Pay Data

- CARE Pay for current protected members
- Final Salary Pay for Remedy Period
 - Include any temporary promotion not pensionable in FPS 2015
- For retained this will be actual pay and full time equivalent pay to establish service records

Service Records

- Final Salary Service Record will need re-creating
 - Maternity Leave
 - Paternity Leave
 - Parental Leave
 - Authorised Absence
- Have contributions been repaid to establish service?
- Changes to hours are recorded

Final Salary

- Would entitlement to two pensions have been established by a drop in pay?
- Temporary Promotion in FPS 2015 would be treated as APB in Final salary if appropriate discretion is in place
- CPD payments in FPS 2015 will need to be treated as APB in final salary scheme

Opt-Outs

- Dependent on consultation decision
- Eligibility Criteria needs to be established
- Data needed
- Collate all opt-outs from 1 April 2014
- Establish reason for opt-out, ie auto-enrolment

Is data as expected

- Data held securely on software
 - Reporting available on expected fields
 - Employer data such as retained firefighter employment records
- Data provided on time and accurate to administrators?
- Processes to ensure the administrator is aware of entitlement
 - Drop in Pay
 - Additional Pension Benefits

Data Scoring

Measuring

- Do your processes work?
- Do you know what should be provided (link back to knowledge?)
- What are the effects
- How is your score measured and reported
- What is your action plan

Weighting

- Developed guidance to measure effectiveness of processes across 4 categories
 1. Data as expected
 2. Consistency
 3. Validation
 4. Specific Processes

[Weighting template](#)

Are you dashboard ready?

- A platform to allow savers to view all their pension pots through a single portal.
- DWP have [consulted](#) on dashboards. To be compulsory but public sector expected not to join for 3 / 4 years.
- LGA [response](#) to consultation
- [Pension dashboard call for input](#)
- Further information can be found on <https://pensionsdashboardproject.uk/>



Collect the right money at the right time!

Contribution Payments

- **82% of Firefighters' Pension Schemes reported to have a process for resolving contribution payment issues**
- Surely as a single employer there are no issues....

Business as usual



- **Resources**

[Contributions Holiday](#)

[Pensionable Pay](#)

[Special members](#)

[Additional Pension Benefits \(APBs\)](#)

The level of ill-health charge for FPS 2015 continues to be set at the rate that operates for 1992 and 2006 schemes as per [finance guidance](#). Four times final salary for higher tier and two times for lower tier. [[Bulletin 9](#)]

Calculation of correct APB rate as per circular [FPSC 2/2008](#)

Does your discretion policy require the paying of employer contributions for different types of absence

Employer Ill-health contributions, do you know what's payable

Processes for contribution holiday

Monitoring FPS 2006 special members by direct debit

Retrospection of pensionable pay decisions

Tapering

Remedy Contributions



- Contribution Holiday
 - + Returned to legacy scheme and would have been entitled to contribution holiday under legacy scheme rules
 - Treated as reformed scheme for remedy period, contribution holiday period would need repaying.

Balancing contributions between FPS 1992 and FPS 2015

Refund contributions between FPS 2006 and FPS 2015

Additional contributions for Temporary Promotion to be treated as APB under FPS 1992 & FPS 2006

Additional balancing payments for CPD as an APB in FPS 1992 & FPS 2006

Adjustment +/- for contribution holiday

What happens when it goes wrong

Breaches

- **98% of Firefighters' Pension Schemes reported to have procedures to identify, assess and report breaches of the law, this has risen from 36% in 2015.**
- The TPR administration and governance survey results showed that in 2018 only 2% of an identified 17% recorded breaches of law were reported as material.
- [FPS AGM TPR breaches presentation](#)

Reporting Breaches

Reporting a breach



- Reports should be in writing and should include:
 - a high level summary of the issue
 - why it has occurred
 - whether a third party (e.g. an employer) is involved
 - how many members and what kinds of members are affected
 - the action being taken to address the issue
 - when the breach will be rectified
 - how effects on members minimized
 - how future breaches of this type will be prevented
- Breaches can be reported online, and you can call our customer service team

Breach Assessment

The form is titled 'Firefighters' Pensions England Scheme Advisory Board Breach Assessment Template'. It includes sections for 'Date of assessment', 'Introduction', 'Identified' (with a list of potential breach types), 'Assessment' (a table with columns for Cause, Effect, Reaction, and Wider implications), 'Action' (with a table for 'Report as material breach' and 'Recorded as breach'), and 'Board Review' (with a table for 'Tabled at Board Meeting' and 'Agreed by board').

Breach Assessment Template

What can go wrong

- Two pension entitlements
 - Failure to provide timely, accurate or complete data
 - Systems or process failure
 - Failure to maintain records or rectify errors
 - Failure to communicate
-

To act without conflict

Conflict of Interest

- **94% of Firefighters' Pension Schemes reported to have a policy to manage board members conflicts of interest, this has risen from 79% in 2015.**
- The scheme manager must ensure there is no conflict of interest upon appointment and manage any potential conflict of interest that may arise.
- Conflict does not arise by virtue of membership of the scheme or any connected scheme, but means a financial or other interest likely to prejudice the person's exercise of functions as a member of the board.

Conflict of Interest

- Identify
- Monitor
- Manage

Remember

1. Assess and mitigate your risks
 2. Encourage knowledge and skills
 3. Know your data
 4. Collect the right money at the right time
 5. Record and report when something goes wrong
 6. Act without conflict
-

Any questions



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