

Authority response to the consultation document from the Department for Communities and Local Government (DCLG) 'Firefighters' Pension Scheme 2015: Proposals for new governance arrangements'

Question 1:

Do the draft regulations deliver the policy objective on the introduction of the local pension boards and a Scheme Advisory Board as set out in this consultation document?

West Midlands Fire and Rescue Authority (WMFRA) Response Q1:

The draft consultation regulations do deliver the policy objective on the introduction of the local pension boards and a Scheme Advisory Board.

Question 2:

Do you have any comments on the terms of the local pensions boards or Scheme Advisory Boards as set out in the regulations?

WMFRA Response Q2:

The regulations should give the opportunity to Scheme Mangers to consider the setting up of pension boards that are wider than local boards. The Pension boards could be regional boards set up in collaboration across fire and rescue authorities. This would provide a higher degree of scrutiny and better value for money for the tax payer through sharing resources and expertise.

This would also support the ongoing collaborative working across Fire and Rescue Authorities and aide in streamlining approaches, reduce cost, enable sharing of best practise, and improve administration. This in turn would support the delivery of a national approach to the delivery and administration of the scheme.

Question 3:

Are there other powers of requirements that should be put in place for local pension boards or Scheme Advisory Boards?

WMFRA Response Q3:

Consideration should be given for an appropriate feedback loop from each local Pension Board to the Scheme Advisory Board to enable activities and effectiveness of the Boards to be monitored. This would encourage the development of a process of self regulation.

Question 4:

Should the regulations be more, or less prescriptive about potential members of the local pension boards or the Scheme Advisory Board?

WMFRA Response Q4:

The regulations should be less prescriptive around the number of members on pension boards and this should be determined locally.

Question 5:

Is there an alternative funding mechanism for the Scheme Advisory Board which could be put in place rather than raising funds from scheme managers with the Secretary of State ensuring that the Board is delivering value for money?

WMFRA Response Q5

WMFRA believe that the Scheme Advisory Board should be funded centrally.

Question 6:

Do you consider that any groups with protected characteristics under equalities legislation are being disproportionately affected? If so, what do you consider to be the nature and scale of that disproportionate effect?

WMFRA Response Q6

The proposals do not directly negatively impact on people with protected characteristics. However, due to the make up of our scheme members the likelihood is that there will be a less proportionate representative of people with protected characteristics on the board. We do believe that this is something that needs to be considered by the Scheme Manager and Pension Board.