



LPB-082
LFC-26-053

LONDON FIRE BRIGADE

London Fire Commissioner's Local Pensions Board Annual Report 2025/26

Report to:	Date:
Local Pension Board.....	11 June 2026
Commissioner's Board	07 July 2026
Deputy Mayor's Fire Board.....	28 July 2026
Audit Committee	30 September 2026

Report by:
Virginia Burke, Independent Chair.

Approved by the London Fire Commissioner's Local Pension Board

Report classification:

For information

For publication

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This Annual Report outlines the main activities and governance of the London Fire Commissioner's (LFC) Local Pension Board (LPB) from 1 April 2025 to 31 March 2026. The LPB plays a critical role in assisting the LFC, as Scheme Manager, in ensuring compliance with pension regulations relating to governance and administration, and any requirements of the Pensions Regulator, for the Firefighters' Pension Schemes (1992, 2006, 2006(M) and 2015).

More detailed information about the Local Pension Board, including its Terms of Reference, membership and minutes of its meetings are available on the London Fire Brigade website <https://www.london-fire.gov.uk/about-us/transparency/local-pension-board/>

Key developments during the year include the successful appointment of Virginia Burke as Independent Chair (replacing Clair Alcock) from July 2025. The Board maintained a balanced composition of employer and employee representatives and held three quorate, online or in-person meetings at LFB HQ. The meeting planned for March 2026 was held in April.

Implementation of the McCloud/Sargeant remedy remained the Board's primary focus during the year. Significant progress was made in issuing Immediate Choice Remediable Service Statements (ICRSS), although national challenges affecting fire pensions continued to impact delivery timescales for complex cases. Accordingly, LFC reported a material breach to the Pension Regulator in September 2025.

Other significant areas of activity during the year included contingent decision cases, Matthews 2 claims, member communications, annual Benefit Statements (ABS) and preparations for the Pensions Dashboard. The LFC successfully connected to the Pensions Dashboard, ecosystem in December 2025.

Board members continued to undertake training and development activities in line with the expectations of The Pensions Regulator, including participation in national pension forums and Local Government Association (LGA) events.

The Board's priorities for 2026/27 include completion of outstanding remedy cases, continued management of contingent decision and Matthews 2 cases, and improvement of member service, member communications and data quality.

The Board is satisfied that it has fulfilled its statutory responsibilities during 2025/26 and provided effective oversight of pension governance and administration during a period of significant regulatory and operational challenge.

Recommended decision

That the Board notes the report

1 Introduction and background

- 1.1** The Public Service Pensions Act 2013 (the Act) introduced a framework for the governance and administration of public service pension schemes, including those pension schemes for fire and rescue workers. The Act included the requirement for a Local Pension Board (LPB) to be established by each responsible Authority.
- 1.2** Following the abolition of the London Fire and Emergency Planning Authority and the establishment of the new governance structure, the London Fire Commissioner (LFC) approved the creation of a new Local Pension Board in 2018 in respect of the firefighter pension schemes, in accordance with the requirements of the Public Services Pensions Act 2013.
- 1.3** The purpose of the Board is to assist the LFC in its role as the Scheme Manager of the Firefighters' Pension Schemes: 1992, 2006, 2006(M) and 2015. Such assistance is to:
- Secure compliance with the Schemes' regulations, any other legislation relating to the governance and administration of the Schemes, and requirements imposed by the Pensions Regulator in relation to the Schemes; and
 - Ensure the effective and efficient governance and administration of the Schemes.
- 1.4** The LFC is the Scheme Manager for the firefighters' pension schemes, which is a role defined by the Act. The management of some specific responsibilities for Stage 1 Internal Dispute Resolution Procedures (IDRP) and scheme discretions are delegated to the Assistant Director Finance and the Head of HR Operations and Systems respectively, as set out in the Scheme of Governance. The management of the day-to-day responsibilities of the Scheme Manager are delegated to the Director of Corporate Services. This report serves to communicate to the LFC and the Deputy Mayor for Fire and Resilience the activities of the Board during the financial year ending 31 March 2026.

Responsible authority

- 1.5** The responsible authority is the government department responsible for the development of central policy and legislation that applies to the Firefighters Pension Scheme. The Ministry of Housing, Communities & Local Government (MHCLG) is the responsible authority for the fire service and remedy legislation specifically.

Constitution

- 1.6** A constitution for the Local Pension Board was approved by the LFC at the time that the Board was created and reviewed and updated in 2025.

Format of meetings

- 1.7** The Board scheduled four meetings during 2025/26. Three quorate meetings were held in 2025/26 with the final meeting taking place shortly after year end.
- 1.8** Board members are required to declare any potential conflicts of interest to the Scheme Manager on appointment and at any such time as their circumstances change, in line with the

Board's Conflicts of Interest Policy. No conflicts of interest were declared during the 2025/2026 year.

1.9 Board members are asked to inform the Scheme Manager of any reported breaches of the law.

1.10 Minutes are taken at all meetings.

Board membership

1.11 Following the resignation of Clair Alcock, Virginia Burke was appointed Independent Chair with effect from 1 July 2025.

1.12 As set out in the constitution, there is an equal number of employer and employee representatives on the Board (4 of each), with nominated substitute members who can act as Board members in the absence of one of the full members.

Training

1.13 The Pensions Regulator has published a Code of Practice for the governance and administration of public service pension schemes. This Code sets out the requirement for Board members to achieve and maintain knowledge and understanding sufficient to enable them to carry out the role of Board member.

1.14 Board members undertook a range of training and development activities during the year, including events organized by the Local Government Association and national Firefighters pension forums.

2 Managing the Remedy

2.1 Implementation of the Remedy continued to present significant operational and administrative challenges nationally, particularly in relation to data requirements, complex member cases, evolving policy and guidance, and system/calculator dependencies. A Pension Manager was recruited in July 2025 to assist the Scheme Manager and Local Pension Board in dealing with the complexity of issues faced by the Brigade.

The legislative requirements

2.2 The [legislation \[29\(10\)\]](#) required a remediable service statement (RSS) to be provided to all eligible members by 31 March 2025 unless a later date was considered reasonable in certain cases.

Board oversight

2.3 The Board's scrutiny has been robust with a strong member emphasis. The Board has sought continually to have visibility on progress which has been provided by their administrators in reports to the Board, and has sought confirmation of appropriate communications to members.

2.4 Members who did not receive an ICRSS by the deadline were written to explaining the reason for the delay in their particular case. The Pension Regulator was notified of the delay in May 2025 at which time a revised completion date of 30 September 2025 was communicated.

2.5 Significant progress was made and regular updates were provided to the Scheme Manager and Pension Board. However, the September 2025 date was not achieved for all members and so a formal breach report was submitted to the Pension Regulator with a new target of 30 June 2026.

- 2.6** During the year the Board reviewed its performance with other Fire and Rescue Authorities. It is clear that most, if not all FRA's struggled, and continue to struggle, to complete the McCloud remedy work and so the LFC is not an outlier in this regard. The Board continues to exert pressure on LPPA and MHCLG to allow the work to be completed as soon as possible.
- 2.7** The Board's role is to assist the Scheme Manager in complying with the regulations. This has been through seeking assurance at the Board meetings, with attendance from the administrator and the Scheme Manager as noted in the minutes and by providing reassurance in quarterly verbal reports to the London Fire Commissioner at the quarterly Commissioner boards.

Challenges outstanding

- 2.8** Despite the progress over the past 12 months, a number of challenges remain:

1. Contingent decisions
2. Matthews 2
3. Compensation decisions

Contingent decisions

Contingent decisions relate to earlier opt-out and added service decisions impacted by Remedy.

The LFC has received over 60 contingent decision claims, the majority of which have been approved. However, due to policy and legislative delays, FPS1992 cases are held awaiting MHCLG direction. Approved FPS2006 claims are being progressed where a retirement is imminent.

The Board continued to monitor contingent decision cases arising from Remedy implementation. These cases remain nationally complex and dependent on ongoing policy development and administrative processing.

Matthews 2

The Board also monitored the processing of Matthews 2 claims for eligible members with retained service. Work in this area continues in conjunction with other Fire and Rescue Authorities.

Compensation

The Board received updates on compensation arrangements associated with Remedy implementation, including future claims processes and emerging operational considerations.

- 2.9** One compensation claim was processed by the LFC in the year, amounting to less than £2,000.

3 Additional board activity

- 3.1** Other areas which have been discussed at Board meetings include:

- Administration performance
- Member communications, including progress towards a pension calculator and a focus on opt-outs
- Data quality
- Pensions Dashboard
- Breaches of the law
- Risk management

- 3.2** All of these areas are reported and discussed as standing agenda items at each Board meeting. Additional reporting on data quality was requested and provided during the year, and data

quality improvement work is ongoing.

- 3.3** The Board maintained oversight of the pension risk register and monitored key risks including remedy implementation, administration capacity, pension dashboard compliance and data quality. A risk workshop was held to strengthen the identification, management and monitoring of scheme risks, including cyber risk.

4 Future workplan

- 4.1** The Board's priorities for 2026/2027 include completion of outstanding remedy cases, oversight of compensation processes, management of contingent decisions and Matthews' 2 cases, continued monitoring of pension dashboard compliance, and improvement of member communications and data quality.

5 Objectives and expected outcomes

- 5.1** That the Board note this report.

6 Equality comments

- 6.1.** The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.
- 6.2.** It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 6.3.** The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.
- 6.4.** The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
- eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 6.5.** Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
 - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

6.6. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

6.7. Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- tackle prejudice
- promote understanding.

6.8. An Equality Impact Assessment (EIA) found outline neutral impacts identified and steps taken to mitigate these.

7. Other considerations

7.1 Staff side are represented on the Local Pension Board and so will have an opportunity to comment on this report at the LPB meeting on 11 June 2026.

7.2 This report does not produce any environmental or sustainability implications.

7.3 There are no procurement implications for this report

7.4 There are no communication implications for this report

8. Financial comments

8.1. The Board has incurred fees amounting to £15,677 plus reimbursement of out-of-pocket expenses over the course of the year.

9. Training

9.1 The training of Board members is largely carried out in house at no direct cost, and national events such as the LGA conference have been free of charge so far as part of the LFC's subscription to the LGA. If Board members must travel to attend training events this cost is contained within existing budgets.

9.2 The LFC continues to pay a levy to the Scheme Advisory Board (SAB) and this will cover the cost of the national fire pensions technical advisor posts and support the work of the SAB. The aim of the SAB in setting this levy is to help fire authorities to achieve cost savings by producing guidance and communications centrally for authorities to share. The cost to LFC in 2025/26 is £55,048, and this has been provided for within the revenue budget.

10. Legal comments

9.0 This report sets out the Annual Report covering the activities of the LFC's Firefighters Pension Schemes Local Pension Board (the Board) for the year to 31 March 2026 is for information only, therefore no direct legal implications arise.

9.1 The Local Pension Board was established under the Firefighters Pension Scheme (Amendment) (Governance) Regulations 2015. The Public Service Pensions Act 2013 introduces the framework for the governance and administration of public service schemes and provides an

extended regulatory oversight by the Pension Regulator.

9.2The Pension Regulator's Code of Practice No. 14 (Governance and administration of public service pension schemes) was replaced by the new General code of practice established by SI 2024/431 sets out the legal requirements for public service pension schemes as well as the standards of conduct and practice of the Local Pension Board. The information within this report is in accordance with the legislation and associated Code of Practice.

Appendix 1

Board membership

Details of the Local Pension Board members during 2025-26 are shown below.

Dates of membership	Name	Role	Nominating organisation
Ended 30/6/25	Clair Alcock	Chair	Independent
Commenced 1/7/25	Virginia Burke	Chair	Independent
Commenced 22/02/2022	Nick Davis		Employer
Commenced 01/09/2025	Kevin McKenzie		Employer
01/12/2025	Alan Taylor		Employer
01/12/2025	Chris Jenner		Employer
01/04/2020	Gareth Beeton		FBU
01/04/2020	Jon Lambe		FBU
01/04/2020	David Shek		FBU
01/01/2026	Neil Guyett		FOA

Substitutes in 2025/26:

Employee substitutes - Gareth Cook, Adam Shaw, Karl Smith

Employer substitutes – David Bracewell, Ben King, Shawn Coltress, Verona Rawlings

Board meeting attendance

During the 2025/26 scheme year the Local Pension Board met on three occasions. Attendance is shown in the table below.

Name	12 June 2025	11 September 2025	11 December 2025
Virginia Burke		√	√
Clair Alcock	√	No longer a member	

Employer Representatives			
Nick Davis	√	X	√
Dan Kipling	X	√	√
Keeley Foster	X	No longer a member	
Kevin McKenzie	x	√	√
Alan Taylor	√	√	√
Chris Jenner	√	√	X
Employee Representatives			
Gareth Beeton	√	√	√
Jon Lambe	√	√	√
Dave Shek	√	√	√
Prospect Representative			
Frazer Ferguson	X	X	√
Substitutes:			
Adam Shaw – Employee representative	√	√	√
Karl Smith – Employee representative	√	√	x

Part two confidentiality

Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part Two form, together with the legal rationale for non-publication.

Is there a Part Two form: ~~YES~~/NO*

Originating officer declaration

Reporting officer to confirm the following by using 'x' in the box:

Reporting officer

Virginia Burke has drafted this report and confirms the following:

1. Assistant Director/Head of Service

Catharine Gregory has reviewed the documentation and is satisfied for it to be referred to the Board for consideration

X

2. Advice

The Finance and Legal teams have commented on this proposal:

Yvette McEntee Legal Advisor, on behalf of General Counsel (Head of Law and Monitoring Officer).

X

Catharine Gregory, Assistant Director, Finance on behalf of the Scheme Manager

X

Jonathan Hurford-Potter, Pension Manager on behalf of Head of HR Operations and Systems.

X