# FBU response to the consultation on the regulations to introduce a New Firefighters’ Pension Scheme from April 2015

July 2014

## Introduction

The FBU has a proud reputation for its professional approach and represents over 40,000 members currently working in all uniformed roles in the fire and rescue service. This represents, when account is taken of dual-roles, 80% of the uniformed workforce in the UK fire and rescue service. The FBU also represents over 7,500 retired and out of trade members - the vast majority of whom are covered by the pension schemes. The issues addressed in this response are of great concern to all FBU members. They also impact on prospects for the effective and efficient performance of the UK fire and rescue service in the future.

This document provides a further response from the Fire Brigades Union (FBU) to the consultation document, 'Firefighters' Pension Scheme Regulations 2014'. The previous response from March 2014 has been included for information as many of the issues contained within it remain unresolved.

The FBU has previously submitted several documents (full list as appendix A), which raise many outstanding issues relating to the affordability, sustainability, fairness and workability of the current scheme proposals. Most recently the FBU response to the consultation document 'Firefighters' Pension Scheme (1992) and New Firefighters' Pension Scheme (2006) Proposed increases to employee contribution rates, effective from 1 April 2014' contained several references to these points, which are as yet unresolved. These have been resubmitted as part of this further response for information.

In addition to these documents the FBU is submitting:

- Freedom and choice in pensions – Further response from the FBU dated June 2014
- Enhancing the Health, Fitness and Performance of UK Firefighters: an Interim Report By Dr AG Siddall, Dr M Standage, Dr KA Stokes and Dr JLJ Bilzon

This submission will once again primarily focus on the legislative section of the consultation document and once again provides a version outlining concerns and observations on particular sections of the draft regulations. The FBU has also previously met with representatives of the Department for Communities and Local Government (DCLG) specifically to discuss these regulations and would ask that the points raised as part of this meeting are also considered.

This submission consists of three elements:

- Part 1: A reiteration of the FBU's opposition to the proposals
- Part 2: Comments, observations and concerns with the draft regulations
- Part 3: Ongoing concerns in relation to the equality statement.

## Part 1 – The FBU position: the current proposals remain unsustainable, unworkable, unaffordable and unfair.

**In all forums and in all previous responses the FBU has provided clear and concise evidence, which demonstrates how the government's current proposals for the 2015 firefighters' pension scheme are flawed.**

Indeed we believe there are several areas where pension provision within the fire and rescue service is in urgent need of improvement. We have previously presented independently assessed financial, professional and operational evidence countering the government's proposals, which appear to be based on misguided assumptions and a misunderstanding of the needs of a modern fire and rescue service.[1]

The additional documentation with this further response adds further weight to the FBU concerns around the appropriateness of the normal pension age (NPA) of 60.

Within our previous responses to the proposed 2012 and 2013 increases and after extensive consultation with our members, the FBU made clear the depth of opposition and anger these proposals have generated.

For example, we have previously emphasised that the FBU and its members do not accept there was any justification for increasing the contribution rates originally paid by firefighters which, at 11% for the Firefighters' Pension Scheme (FPS) and 8.5% for the New Firefighters' Pension Scheme (NFPS). These were already amongst the highest paid in the public and private sector. This was highlighted most recently in the FBU submission 'Firefighters' Pension Scheme (1992) and New Firefighters' Pension Scheme (2006) Proposed increases to employee contribution rates, effective from 1 April 2014 DCLG consultation'. Unfortunately the points raised in our response have been largely ignored and a further increase was imposed from 1 April 2014 meaning that the majority of firefighters are now paying around £4,000 in contributions from a salary of less than £29,000.

The FBU has previously raised serious concerns that these increases will result in significant numbers of scheme members opting out or new entrants not joining the scheme. The evidence we have presented shows that this would have a serious financial impact on the scheme in both the long and short term.

The FBU has also raised concerns that if firefighters do not join their pension scheme they will become dependent on benefits in retirement, which again is a cost to the taxpayers.

The proposed scheme is also severely restricted by a cost ceiling about, which the FBU has continually raised concerns around. It also contains a fixed commutation rate that does not take account of the normal pension age of the scheme and the fact that government claim firefighters are living longer firefighters.

The background to this consultation document, on page 4, outlines that the reforms were designed to make public service pension schemes affordable and sustainable in the long term. The FBU has previously provided substantial evidence that demonstrates why the current proposals will not achieve this and actually risk the future viability of the scheme.

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[1] Tony Cutler and Barbara Waine, A critical analysis of the Independent Public Service Pension Commission report, (2011)
http://www.fbu.org.uk/wp-content/uploads/2011/09/7649-Pensions-Report-Cutler-+-Waine-Low-RES-PDF.pdf
First Actuarial, Impact of Government's proposals for members of the FPS and NFPS, (31 August 2011)
http://www.fbu.org.uk/wp-content/uploads/2011/10/First-Actuarial-report-consolidated.pdf

In section 1, page 5, the government uses the argument that as people are living longer it is necessary to reform the schemes to avoid an increased burden on taxpayers. The FBU has previously responded to this suggestion and included several examples provided by professional actuaries (First Actuarial), which illustrate how the proposals could substantially increase the burden on taxpayers in the long and short term. It is essential that any reforms must also ensure that the pension scheme reflects the occupation to which it relates.

The claim that firefighters are living longer is further brought into question by the latest review of commutation factors (document enclosed). This review carried out by the Government Actuary's Department highlighted that revised data from fire authorities indicated that there was systematic under-reporting of deaths for the previous 2007 scheme valuation. This in turn was highlighted as possibly introducing an element of inaccuracy in setting the mortality assumption at that time.

This has subsequently resulted in the age-related commutation factors being reduced to reflect this over-assumption. If the key argument for making these changes is based upon people living longer this latest finding is an important development that needs to be considered.

In this section the paper suggests a rationale for reforms are that for every £1 the employee contributes the taxpayer contributes £5. The FBU have previously submitted a response to this suggestion outlining why this is inaccurate.  As part of this response we are re-submitting a paper from First Actuarial setting out their analysis of the YouGov survey carried out on behalf of the Fire Brigades Union (FBU) in December 2013, and the possible implications for the FPS.

Paragraph 1.3 repeats the government claim that firefighters will receive one of the most generous public service pensions quoting figures for firefighters retiring after a full career age 60.

The FBU has shown that this is misleading in its response submission 'Firefighters' Pension Scheme (1992) and New Firefighters' Pension Scheme (2006) Proposed increases to employee contribution rates, effective from 1 April 2014 DCLG consultation', which is repeated below:

> Government claims that the firefighters' pension scheme is "generous". But it does not take into account the fact that the FPS has one of the highest employee contribution rates in the public sector. They claim that a firefighter, who earns £29,000 and retires after a full career aged 60, will receive £19,000 a year pension, rising to £26,000 with the state pension.
>
> This is the best case scenario and is based on unrealistic expectations. To receive £19,000 a year in the 2015 scheme, a firefighter has to join at age 20 work 40 years and retire at age 60. If instead he/she retires at age 55, for example if he/she is deemed to be unfit for duty, the pension would only be around £17,000 based on 35 years' service. This pension would also be actuarially reduced by 47.1% (based on the proposed Heads of Agreement and a State Pension Age of 67, the reduction would be 50.3% for a state pension age of 68), so the pension would only be around £9,000 a year. Even the improved conditional offer for early retirement contained in DCLG Fire Minister Brandon Lewis's letter of 19 June 2013 (which has been subsequently withdrawn) would still see a reduction of around 21.8% at age 55, so the pension would reduce to around £13,500 a year. Either way, the pension payable to many firefighters will be far less than the £19,000 a year that is claimed.

Furthermore, the state pension is not paid until state pension age. So, if a firefighter retires at age 55, s/he will have to wait another 10 to 13 years before s/he gets the additional £7,000 a year. When considering if the proposed 2015 FPS is one of the most generous pension schemes in the public sector, it is important to look at the ratio of the proposed average employee contribution rate to the gross cost ceiling (i.e. the theoretical cost of the 2015 schemes). This assumes that the proposed employee contribution rates that will apply from April 2015 will be the same as the rates currently outlined in the consultation document.

| Pension Scheme | Proposed average employee contribution rate from April 2014 (A) | Gross cost ceiling (B) | Ratio = [ (A) / (B) ] |
|---|---|---|---|
| NHS | 9.8% | 21.9% | 45% |
| PCSPS | 5.6% | 22.5% | 25% |
| TPS | 9.6% | 21.7% | 44% |
| LGPS | 6.5% | 20.4% | 32% |
| FPS | 13.2% | 27.0% | 49% |

The table above shows that the 2015 FPS is expected to have the highest ratio of average employee contribution rate to the total cost of the scheme, with members of the 2015 FPS contributing 49% of the total cost compared to as little as 25% in the Principal Civil Service Pension Scheme ("PCSPS"). This suggests the FPS is far from being the most generous public sector pension scheme. Indeed, in reviewing the MPs Pension Scheme the Independent Public Service Pensions Authority (ISPA) proposed that MPs should meet 40% of the cost of their pensions, which it claims is "in line with the share that would be typically be met by members in the new public service schemes to be introduced from 2015".

The government has also claimed that an equivalent private pension pot would be worth over half a million pounds and would require firefighters to contribute twice as much. However, First Actuarial has advised the FBU that this is not the case. While it can be claimed that based on current annuity rates, to provide a pension of £19,000 a year could require a private pension pot of over £500,000, in practice the situation is different. In reality public sector pension schemes, like private sector occupational pension schemes, help keep down the costs of pension provision by "pooling" members' funds and providing pensions in an efficient way that doesn't require the purchase of a costly annuity with an insurance company at retirement. Annuities offered by insurance companies build in allowances for insurance company profits. Therefore, the actual reserves that a private sector occupational pension scheme would hold to provide a pension of £19,000 a year would be much lower than £500,000.

Building up a private pension pot of around £500,000 over a full career of 40 years would require a total contribution rate of around 15%, based on a firefighter earning around £21,000 on joining the Scheme and earning around £29,000 at retirement. This assumes conservative investment returns before retirement of 6% pa before age 50 reducing to 0.5% pa at age 60, in line with Statutory Money Purchase Illustrations ("SMPI").

The statement that firefighters would need to contribute "twice as much" is clearly exaggerated, with firefighters possibly being asked to contribute around 12.6% on average in the 2015 scheme.

Furthermore, in a private sector occupational pension scheme, the employer would also typically contribute, perhaps in the ratio 1:1 or 2:1 (employer: employee). So, if the total cost is 15% a year, then employees would typically only pay 7.5% or 5% to build up an equivalent pension.

**MPs pensions**

The claim that firefighters' pensions are "generous" is not borne out when comparing the proposals to the MPs scheme. A House of Commons Library report[2] shows that:

- Current MP pension schemes have more generous accrual rates for paying far lower contribution rates than those for firefighters
- The proposed accrual rate in the new 2015 firefighter pension scheme is worse than in other reformed public sector pension schemes (although the proposed revaluation rate is better)
- The proposed reform to MP pensions will see far more generous 40/60 split of scheme costs between MPs and the tax-payer compared to a 49/51 split proposed for firefighters.

Members of Parliament can currently choose their preferred contribution rate against accrual rate from the following compared to the firefighters proposed scheme.

| **Contribution rate (% of pay) from 1/4/2013 and accrual rate** | | | |
|---|---|---|---|
| **MP's Accrual Rate**<br>**Contribution Rate** | **1/40th**<br>13.75% | **1/50th**<br>9.75% | **1/60th**<br>7.75% |
| **2015 Firefighters Accrual Rate**<br>**Contribution Rate** | **1/58.7th**<br>**13.2%** | | |

The report also highlights the differences in relative contributions:

> At present MPs contribute 37% of the costs of accrual to the pension scheme. This is not far from the typical contribution in future public service schemes, which is 40% from the employee and 60% from the employer. We think it is reasonable to follow the precedent set by other schemes and therefore propose that the 40/60 split should also apply to the MPs' pension scheme. At a cost of 22.9% of payroll, this would mean that MPs contribute 9.16% of their salaries towards the pension scheme. The taxpayer would contribute 13.74%.

Given that government states that a 40% employee/60% taxpayer split is "reasonable" for MPs and this 40/60 split will be the typical contribution in future public service schemes, it is not reasonable for the government to claim that the firefighters' pension scheme with a 49% employee/51% taxpayer split is "one of the most generous schemes anywhere".
If the contribution ratio for the 2015 firefighters' pension scheme reflected the governments' typical ratio of 40%/60% the employee contribution rate in the 2015 should be amended accordingly.

[2] House of Commons Library, MPs' Pension Scheme – 2012 onwards, Standard Note SN 6283, Business and Transport Section, updated 15 July 2013

**Scheme design**

Section 2 of the consultation document deals with policy context, the discussions around the principle reforms, the Public Service Pensions Act and the proposed scheme design. The FBU has previously submitted concerns around the current proposals and has raised objections in several key areas as part of the ongoing discussions.

The FBU position is that the proposals outlined on page 8 indicates that the proposed scheme design does not take account of the specific occupation and remains unworkable, unsustainable, unaffordable and unfair. The FBU has an ongoing dispute in relation to these proposals which includes a live ballot for both strike action and action short of strike.

Section 3 relates to the timings and proposals and covers valuations, contribution rates, cost cap, transitional arrangements and governance issues.

This FBU response to this consultation does not cover areas of governance, advisory boards or pension board proposals as it is the government intention to consult on this at a later date.

**Valuation**

The FBU has submitted some concerns with the assumptions used in the valuation, which is included in this submission for information.

Section 4 summarises the previous consultation and responses. The FBU is very disappointed that although it has submitted a significant amount of supportive evidence the key concerns remain unaddressed.

Protection remains a key concern for existing firefighters but despite this government has indicated it does not intend to extend its current position further. While government claims that a greater proportion of firefighters are protected from the changes than any other large workforce, this does not recognise our concern that firefighters will not be able to maintain their operational fitness until age 60 and will need the protection.

The Williams review recognises this on several occasions, most notably when it states:

> Significant numbers will be in a position where they can no longer cope, often through loss of fitness, but the only option is to leave or have their contract terminated...[3]
>
> Recent data collected from four FRSs found at 50-54 years of age, 51% (n=417/822) of firefighters were below 42 $mL.kg^{-1}.min^{-1}$. At 55-60 years, 66% (n=70/106) of firefighters were below this minimum standard.[4]

Dr Williams suggests that:

> Not all firefighters will be able to maintain physical fitness. People do not age at a standard rate, some will find it harder than others to keep physically fit. A possible option to consider here is to give more protection to those who are members of the 1992 Firefighters' Pension Scheme.[5]

[3] 9.1.2 page 123 Normal pension age for firefighters - a review for the firefighters' pension committee
[4] 12.2.5 page 143 Normal pension age for firefighters - a review for the firefighters' pension committee
[5] 11.5.4 page 138 Normal pension age for firefighters - a review for the firefighters' pension committee

Despite this government are persisting with its claim that 100% of firefighters could maintain operational fitness until age 60. This claim is based upon a quote from the Williams review clearly indicating that if a lower standard than the minimum 42 mL.kg$^{-1}$.min$^{-1}$ is allowed 100% would still be operational at age 60 assuming they remain free from injury and disease.

This standard 35 mL.kg$^{-1}$.min$^{-1}$ is significantly lower than the minimum standard and has been recently discussed as part of a recent study by the University of Bath:

> The present study indicates that firefighters with an aerobic capacity below an occupational fitness standard of 42.3 ml.kg-1.min-1 would not be guaranteed to be safe and effective in their ability to complete necessary roles within their occupation. Although this does not greatly differ from the current fitness standard of 42 ml.kg-1.min-1, **it does indicate that the lower VO2 max standard of 35 ml.kg-1.min-1 for continuation of work with remedial training amongst operational firefighters is potentially unsafe for the majority of firefighters** (our emphasis).[6]

The FBU has presented significant evidence outlining why the NPA of 60 is inappropriate. Despite having no evidence to support its introduction, the government have imposed an NPA of 60 and are still refusing to offer additional protection to those who cannot maintain the operational fitness required to safely perform the role until this age.

**Mitigating the impact of the NPA 60**

The impact of having an NPA of 60 could be mitigated by making sustainable and fair arrangements for calculating the actuarial reduction that will be applied if a member of the 2015 Scheme retires early. The consultation paper says that the design parameters for the 2015 Scheme include:

- Flexible retirement from the scheme's minimum pension age of 55 built around the scheme's Normal Pension Age of 60, with members being able to take their 2015 scheme benefits as follows:
  - for all active members who are aged 57 or more at retirement, 2015 scheme benefits taken before Normal Pension Age will be actuarially reduced with reference to the 2015 scheme's Normal Pension Age, rather than the deferred pension age.
  - all other members will have their 2015 scheme benefits actuarially reduced on a cost neutral basis from the scheme's deferred pension age.

The consultation paper also says that these parameters reflect the government's final position (paragraph 2.7), and these early retirement proposals are beyond the scope of the present consultation.

The FBU believes that these proposals are unlawful. The union's solicitors have written formally to the Secretary of State to say so and to explain why. A copy of their letter is attached. The union has not received a substantive reply, and the FBU intends to pursue this matter further.

[6] AG Siddall, M Standage, KA Stokes and JLJ Bilzon, (2014) Enhancing the Health, Fitness and Performance of UK Firefighters: an Interim Report, page 33

The FBU and DCLG have discussed several options around early retirement factors whereby active members of the scheme are retiring from active status and not deferred status. The Government Actuary's Department have confirmed that these can be delivered within the cost restrictions applied by HM Treasury for the 2015 scheme. The relevant correspondence has been published on the Department's website, and the FBU is keen to investigate the options further with the Department and the Government Actuary's Department when the Department says it is willing to do so.

**Freedom and choice in pensions**

It is also important that within this response consideration is given to the Treasury proposals to increase the minimum pension age from 2028 as well as restricting transfers from defined benefit schemes to defined contribution schemes. The consultation on this issue closed on 11 June 2014 and to date the summary of responses and any decision is not yet available. The FBU submitted a response to that consultation (attached). A decision around minimum pension age or restriction of transferability of benefits could impact on the current government proposals and the FBU reserve the right to comment on this further as appropriate.

**Employee Contributions in the Firefighters' Pension Scheme 2015**

Section 5 page 19 outlines the employee contributions of the 2015 scheme. The FBU has submitted a response to the government's proposal to increase the contributions for employees in the existing firefighters' schemes since 2011. The most recent submission is included in this submission for information purposes. These submissions have raised concerns not just with the existing schemes but the proposed contribution rates for the 2015 scheme.

A key concern related to the initial increase for current members of the NFPS who are transferred into the 2015 scheme and faced an increase of around 2.2% in employee contributions in one year.

The proposal now suggests a phasing in of the 2015 scheme contributions for the majority of firefighters from 12.2% in 2015-16 to 12.9% in 2018-19. While this is an improved position it does still mean that current members of the NFPS with a contribution rate of 10.4% who are transferred into the 2015 scheme will still face a further increase of around 1.8% in employee contributions in one year, with subsequent increases for a further three years.

**Section 6 – Next steps**

The FBU's responses to the questions set out in Section 6 are as follows.

**Question 1**

**Do the revised draft regulations continue to meet the design parameters of the Firefighters' Pension Scheme 2015 as set out in the Proposed Final Agreement published on 24 May 2012?**

The FBU does not accept that the design parameters are appropriate.

**Question 2**

**Do the benefits (including the ill-health retirement benefits and other ancillary benefits) in the draft regulations sufficiently match those in the New Firefighters' Pension Scheme 2006, with sufficient adaptions for a career average revaluation earnings arrangement?**

The FBU made detailed comments on the draft Regulations annexed to the first consultation, some of which have been addressed and some of which have not. The FBU would welcome the opportunity to discuss these questions of detail with the Department.

In reply to the limited scope of this question (do the benefits outlined in the draft Regulations match the NFPS:

Draft regulation 18 (pensionable pay) says that CPD pay is pensionable only if the scheme manager so determines. That does not match NFPS Part 3 rule 7B, which says that members "shall" be credited with an amount of additional pension benefit for the CPD paid.

Draft regulations 85 and 86 say that, on the death of a pensioner member, an eligible child is entitled to receive a specified proportion of the pension the pensioner was receiving immediately before he or she died. That does not match Part 4 rules 8(2) and (3) of the NFPS, which say that the specified proportion is a proportion of the member's pension as if he or she had not commuted, and had not taken an actuarial reduced pension where either of those circumstances apply.

Draft regulation 134 says that a transfer value will be calculated in accordance with actuarial guidance. Part 12 rule 3 of the NFPS says that the transfer value must be the cash equivalent of the member's accrued rights, meaning, in the case of an active member, his or her right to a pension payable at NPA (and not the deferred pension age). That should be replicated in the new regulation.

The FBU is also concerned that the transitional provisions in Schedule 2 refer at a number of points to members ceasing to be a member of an existing scheme and ceasing to be eligible to join the NFPS. There are circumstances in which a member is still eligible to join the NFPS, and in particular members of the FPS in Scotland and Wales are eligible to join the FPS if they transfer to a fire and rescue authority in England.

**Question 3**

**Do the proposals for the employer additional contributions for ill health awards and the employer additional contributions for a member who has been "employer initiated retired" sufficiently match the existing arrangements in the New Firefighters' Pension Scheme 2006?**

The proposals do not state the period that will be allowed for the payment of such additional contributions. The FBU believes that the period allowed should be sufficiently long to give authorities a realistic opportunity to exercise their discretion to allow an authority-initiated early retirement.

**Question 4**

**Do the proposals for the arrangements for the Firefighters' Pension Fund sufficiently match those in the New Firefighters' Pension Scheme 2006?**

Other than the comment in response to Question 3, the FBU has no comment.

**Question 5**

**Can you foresee any challenges with the proposals for the procedure for ensuring the cost of the scheme is returned to the level of the cost cap as set out at regulation 152?**

See above. The FBU does not accept that the Scheme Advisory Board is the appropriate representative body for consultation under section 12(6) of the 2013 Act.

**Question 6**

**Do you have any comments on:**

**- The proposals that employee contribution rates in the 2015 scheme are based on a member's full time equivalent pay?**

**- The proposals for there to be four tiered bands, with some protection for new entrants?**

**- The level of the tiered bands to be set each year between 2015-16 to 2018-19 as shown in the tables in Section 5?**

See above. The FBU believes that the proposed contribution levels for the 2015 Scheme are unfair and will make the Scheme unsustainable

## Part 3: Ongoing concerns in relation to the equality statement

The FBU has expressed its opinions regarding the use of early retirement factors that differ according to the member's age. The union believes that it is unlawful to do so.

The FBU has previously submitted concerns relating to the impact of the proposed scheme. In July 2012 the union submitted a document outlining various other issues which have still not been addressed.

**Summary of the current equality statement**

The FBU believes that it is inaccurate to claim as government does in its overall assessment (point 10) that 'These policies are not expected to have any disproportionate effect on any of the protected groups'

The reality of the situation is that government has still not addressed the key concerns the union has raised previously mainly in relation to age and gender.

The union has previously outlined that although all firefighters will be adversely affected by the unworkable normal pension age of 60, women firefighters will be disproportionately adversely affected by it. This is outlined by the Dr Williams in his recent review where he highlights that:

> The gender issue is important; only around 25% of women meet the fitness criteria to become firefighters, and a larger proportion will only just exceed the minimum level on entry**. It is likely that a substantially larger proportion of women will find it hard to maintain fitness at the required level, leading to a disproportionate number becoming unfit for firefighting before age 60** (our emphasis). It is important to avoid discrimination under the Equality Act 2010. Allowing women to become firefighters ensures fairness. It is then important to ensure there are no provisions, criteria or practices that discriminate during service.[7]

This is only one example that shows where the NPA 60 will disproportionately adversely affect women firefighters. The FBU feel that this important area has not been addressed and is still a key issue outlining why the NPA remains unworkable.

As firefighters age and cannot maintain the operational fitness levels required to safely perform their role they face the prospect of dismissal using capability processes or accessing a significantly reduced pension. This will also impact disproportionately on women, meaning that they will have a greater threat of capability dismissal or having to accept a significantly reduced pension.

[7] 11.5.5 page 138 Normal pension age for firefighters - a review for the firefighters' pension committee

Appendix A – List of submitted documents

1. Pre action letter to Secretary of State – 9 June 2014
2. Response to pre action letter from TSOL – 23 June 2014
3. Follow up to TSOL letter 25 June 2014
4. Review of commutation factors in firefighters' pension scheme (England) -20 May 2014
5. Enhancing the Health, Fitness and Performance of UK Firefighters: an Interim Report
6. FBU response to the Proposed increases to employee contribution rates, effective from 1 April 2014 -DCLG consultation – This includes the First Actuarial document
7. Initial Fire Brigades Union response to Firefighters' Pension Scheme Regulations 2014 – Submitted March 2014 – Includes part 2 comments on draft regulations
8. Firefighters' Pension Schemes Valuation as at 31 March 2012 - FBU response – 25 October 2013
9. FBU initial response in relation to the changes proposed in the document 'Freedom and choice in pensions'
10. 'Freedom and choice in pensions' - Further response from the Fire Brigades Union – June 2014