



Department for
Communities and
Local Government

Firefighters' Pension Scheme 2015 – Equality Statement

An equality assessment of the firefighters' pension scheme
2015 design set out in the Firefighters' Pension Scheme
(England) Regulations 2014



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1. Name of Directorate
Local Government Finance; Workforce, Pay and Pensions Division
2. Please list all the policy streams in your business area.
<p><i>Include, brief:</i></p> <ul style="list-style-type: none"> • <i>Details of policy aims, and</i> • <i>What outcomes it will achieve</i> <p>The Government's overall policy aim is to introduce new pension arrangements for public servants that are sustainable, affordable, and fair to both public service workers and the taxpayer. It was recognised that reform of the firefighters' pension scheme, like other public service pension schemes, was required so that recent increases in life expectancy were taken into account and that the burden of support carried mainly by the working age population did not become unmanageable or unfair. Lord Hutton was commissioned to review public service pensions and made recommendation to make them simpler, more transparent and fairer to those on low and moderate earnings.</p> <p>In light of Lord Hutton's recommendations, the Government set out its intention to put in place new pension arrangements for public service workers from 1 April 2015. The policy aim of the Firefighters' Pension Scheme 2015 is to:</p> <ul style="list-style-type: none"> • move existing firefighters into new pension scheme arrangements from 1 April 2015 • protect those firefighters who were closest to their current scheme's Normal Pension Age from the effects of the reforms • comply with the requirements of the Public Service Pensions Act 2013 (including the provision of a Normal Pension Age of 60 for firefighters and a deferred pension age of the State Pension age for former pension scheme members) • keep within the cost ceiling set by the Treasury • provide pension benefits to firefighters on a career average basis • deliver an average employee contribution tariff of 13.2% across the 1992, 2006 and 2015 schemes • provide a final salary link for those current active scheme members who have final salary pension rights, and • ensure that those members who leave pensionable service and re-join within five years have their pension linked, on re-joining.

The final scheme design ensures that firefighters will continue to get a good quality pension scheme in retirement, that older firefighters are protected from the effects of the reform, and that firefighters, due to the unique nature of their role, are able to retire from age 60 with an unreduced pension.

A summary of the core parameters of the scheme, to be introduced from 1 April 2015, are set out at **Annex A**.

3. Identify any policy streams aimed at or impacting upon a Protected Group.

The counterfactual or baseline for comparison that has been used to assess the likely impact of the firefighters' pension scheme reforms is the New Firefighters' Pension Scheme 2006 ("2006 scheme"), although the Department has considered the impact on members of the Firefighters Pension Scheme 1992 ("1992 scheme") as appropriate.

Impacts on the Protected Groups

The Department has considered each of the features of the new firefighters pension scheme 2015 ("2015 scheme") on the groups set out below. To inform this Equality Statement, the Department sought views on the potential impact on protected groups as part of its two consultations, beginning in December 2013 and May 2014, on the draft 2015 Scheme Regulations. It should be noted that the regulations that were subject to consultation focused on the benefits that will be received by members of the 2015 scheme. There will be a separate, further, consultation on the detailed transitional arrangements for current firefighter members transferring to the 2015 scheme. A consultation on the proposals for new governance arrangements began on 10 October and will conclude on 21 November. However, for completeness, all aspects of the overall scheme design have been considered in this Equality Statement.

Where held, summary data for each group is shown:

- *Age*. In the 1992 scheme, 42% of members are age 45 or over, 21% are between the ages of 41 and 45, and 37% are under age 41. In the 2006 scheme, 3% of regular members are aged over 50, 5% are between the ages of 45 and 50, 7% are between the ages of 41 and 45, and 85% are under age 41. 58% of retained firefighters in the 2006 scheme are under age 41. The Department does not hold data which distinguishes the age of firefighters by ethnicity.
- *Gender*. In the 1992 scheme, 97% of members are male and 3% female. Out of all of the regular firefighter members in the 2006 scheme, 91% are male and 9% are female. Out of all of the retained firefighter members in the 2006 scheme, 95% are male and 5% are female. This means that, across the 1992 and 2006 schemes, a total of 96% of scheme members are male and 4% are female

(including retained firefighter members). This compares to the general English workforce where 54% of the employed workforce is male and 46% is female. A greater percentage of firefighters' pension scheme members are male, and will therefore be more affected by the reforms.

A breakdown of scheme members by age and gender can be found in the attached **Annex B**.

- *Race/Ethnicity*. The Department does not hold specific data on the race and ethnicity of firefighters in the pension scheme. However, it does collect data on the firefighter workforce generally and this shows that there has been a gradual increase in the representation of minority ethnic staff in recent years, with minority ethnic staff accounting for 3.3% of all firefighters (regular and retained) at 31 March 2013, compared with 2.8% of all firefighters at 31 March 2008, and 1.5% of all firefighters at 31 March 2003.
- *Pregnancy and Maternity*. The Department does not hold specific data on incidences of pregnancy or maternity leave.
- *Disability/Gender reassignment/Sexual Orientation/Religion or belief/Marriage & Civil Partnership*. The Department does not hold data on these specific groups.

Impacts of the key aspects of the reforms to the firefighters pension scheme

The following key aspects of the reforms are outside the scope of this equality assessment:

- pensions in payment and deferred benefits to increase in line with Prices Index (currently Consumer Price Index)
- average member contributions of 13.2% from April 2015, with protection for new entrants. To achieve this average across all of the firefighters' pension schemes based on current projections of pensionable pay from April 2015, it is estimated that the contribution rate in the 2015 scheme would need to average 12.6% in 2015, 12.7% in 2016, and 12.8% in 2017.

Decisions relating to Prices Index are determined by HM Treasury and are subject to separate equality processes.

Proposed member contribution rates follow the arrangements for increases announced at Spending Review 2010. These are subject to separate equality processes.

An assessment has been provided for the other key aspects of pension scheme design. It should be noted that the overall value of a pension depends on unique individual factors that are outside the scope of the pension scheme structure itself.

These factors include period of employment, career progression, salary and personal financial decisions. Provisions may impact on persons differently by virtue of their age and/or gender. However, the Government does not consider that these impacts are unlawful. The Department's justification for the core parameters of the 2015 scheme is set out below.

Career Average Pension Scheme design

Background

As part of Lord Hutton's review of public service pension schemes, seven distinct types of scheme design were identified and analysed. Following the analysis, a short-list of possible scheme designs was produced. It concluded that a scheme design relating to average earnings over the whole of a member's public service career provided the fairest and most sustainable scheme design.

The new public service pension schemes, including the firefighters' pension scheme from April 2015, will therefore continue to offer a guaranteed retirement income that is protected from inflation. However, benefits will be based on the member's earnings for each year of employment, rather than their salary at the point of leaving the scheme, as is currently the case for the 1992 and 2006 schemes.

The intention is to address the fairness gap that exists in final salary arrangements between those with flatter career paths and higher earners, as the review identified that higher earners tend to benefit disproportionately from the traditional final-salary arrangements. The Government wants to ensure a fairer distribution of benefits across the scheme membership than is currently the case.

Firefighters' Pension Schemes

The 2006 scheme (and also the 1992 scheme) is a final salary scheme. The move from a final salary to a career average scheme will have a greater impact on high earners as, under final salary arrangements, high earners tend to receive more pension benefits than the rest of the workforce relative to their contributions made.

Scheme membership data as at 31 March 2012 suggests that less than 1% of regular female firefighters in the 1992 and 2006 schemes earn more than £60,000, which is applicable to the roles of Assistant, Deputy and Chief Fire Officer. This compares with just over 1% of regular male firefighters in the 1992 and 2006 schemes.

However, the actual number of male firefighters (345 males) earning more than £60,000 is much greater than that of females (2 females). This suggests that male firefighters have historically had stronger salary progression than female firefighters and would be more likely to be affected by a move to a career average scheme. However, overall, the roles of Assistant, Deputy and Chief Fire Officer make up less

than 1% of the pension scheme membership.

Evidence also shows that a larger proportion of female firefighters (total workforce) are lower paid compared to males: 80% of the female firefighter workforce (regular and retained) occupy the role of a 'firefighter', whose salary band ranges from between £29,000 to £34,000, compared to 66% of the male workforce which occupy that role. In terms of the overall firefighter workforce data, as at 31 March 2013, it seems that 66% of white firefighters (regular and retained) occupy the role of a 'firefighter' compared to 73% of minority ethnic firefighters which occupy that role.

Annex B provides further information of the firefighter roles held, broken down by Gender and Ethnicity.

Scheme membership data at 31 March 2012, broken down by age, gender and salary band, also shows that 88% of regular female firefighters in the 1992 and 2006 Schemes earn less than £35,000 (equivalent to the role of Watch Manager A or below) compared with 78% of males.

The existing data for regular scheme members earning more than £35,000 suggests that female firefighters are no more likely to progress to senior roles at a later age compared with their male counterparts. For example, looking at regular firefighters who earn in the salary range £40,000 - £50,000, the breakdown is as follows:

	Age 30 - 40	Age 40 - 45	Age 45 - 50	Over 50
Female	22%	41%	30%	7%
Male	10%	24%	44%	22%

It should be noted, however, that only 2% of all female scheme members are in this salary band compared with 6% of all male scheme members. The percentage of females in salary bands over £50,000 is lower than their male counterparts.

Retained firefighter scheme members are difficult to compare according to the combination of age, gender and higher salary band given that all female scheme members, except three, earn less than £35,000.

Annex B provides further information on scheme membership, broken down by Age, Gender and Salary Range.

According to the trend data, the majority of current serving female firefighters and firefighters from ethnic minorities entered the fire service in more recent years, and this might be part of the reason why currently proportionately more white males occupy senior roles. The Department might, therefore, expect this to change over time if the existing trends continue.

The introduction of a career average pension scheme does not itself create differential impacts on different groups. However, moving from a final salary scheme to a career average pension scheme means those firefighter members who previously benefited from the existing distortions created by final salary schemes will cease to do so. Those who historically received proportionately lower benefits under a final salary scheme will receive proportionately more, equalising the effective benefit rate of the two groups going forward.

A career average pension scheme structure is considered to offer the fairest outcomes overall for members as a collective group. While those with slower salary growth may benefit more than high flyers from this scheme design, evidence submitted as part of Lord Hutton's review suggested that higher earning individuals are better positioned than lower earners to bear some of the risks associated with pension provision. Due to their higher disposable incomes, higher earners have a greater capacity for self-provision of pension benefits than lower earners. It is also likely that they may have additional forms of savings and investments that they can use to provide capital and income in retirement. Lord Hutton's final report also suggested that higher earners also live longer, on average, than lower paid workers.

Taking the above into consideration, the relative negative impact of a career average pension scheme design on white male firefighter members compared to women members, or to firefighters from ethnic minority groups, is considered proportionate, particularly because that impact arises because of the differential impact of the existing final salary scheme design, which the current reform will remove.

The Government does not envisage a differential impact on the introduction of a career average pension scheme on persons based on their age, race, disability, gender reassignment, pregnancy and maternity, religion or belief, sexual orientation or marital/civil partnership status.

A provisional accrual rate of 1/59.7th of pensionable earnings each year and active members' career average benefits to be revalued in line with average weekly earnings

The impact for specific age groups would be difficult to determine, and would depend on the career profile of the individual. The Department undertook actuarial modelling to assess the impact of various combinations of accrual rate and indexations. The resulting firefighters' pension scheme design was considered to provide the fairest balance for the majority of the membership across age ranges within the limits of the cost ceiling. The new accrual rate and revaluation of active members' career average benefits are only part of the value of the benefits that will be provided by the scheme.

However, the approach to the pension reforms is that a firefighter entering the 2015 scheme, who remains a member, should get as generous a pension under the new scheme as they would under the current 2006 scheme. Under the 2014 Regulations, a new firefighter who enters the service in 2015 at age 20, progresses to competent firefighter within three years and continues to earn a salary of around £29,000, is likely to receive a pension of around £19,000 (or 67% of their final salary) after 40 years' pensionable service. The same firefighter entering at age 30 is likely to receive a pension of around £15,000 (or 52% of their final salary) after 30 years' pensionable service. The pension benefits provided in these examples represent similar percentages of a member's final salary as the pension benefits a member would get under the 2006 scheme.

In contrast, a very high earner who enters the service in 2015 at age 20 and progresses to Chief Fire Officer, is likely to receive a pension of around £45,200 after 40 years' service (or 35% of a final salary of £130,000). This is a lower percentage of final pensionable pay than the member would receive in the 2006 scheme. This outcome is considered reasonable and proportionate given the desire to introduce a scheme that spreads benefits more evenly based on a member's average earnings throughout their career.

The impact of this accrual rate will be lessened for older firefighters, who are predominantly male and closer to retirement, as they will either remain in their current scheme until retirement or will benefit from transitional protections. However, even those younger firefighters who do not benefit from transitional protections will be eligible to receive the benefits accrued under the current terms of their existing pension scheme (either the 1992 or 2006), prior to transfer to the 2015 scheme, at their current scheme's pension age and with the final salary link being maintained.

Further details on the number of members who will benefit from the transitional protections are set out below, in the section entitled 'Protection to those closest to retirement'.

Normal Pension Age of 60

The Public Service Pensions Act 2013 requires the Normal Pension Age for firefighters to be set at age 60. The scheme's Normal Pension Age of 60 is in line with the current Normal Pension Age in the 2006 Scheme. The Normal Pension Age of 60 was introduced in the 2006 Scheme following the 2002 Independent Review of the Fire Service and extensive consultation with the fire sector.

Lord Hutton, in his review of public service pensions, recognised that there would need to be special consideration provided to the uniformed services and the

Government should consider setting a Normal Pension Age of 60 in line with the Normal Pension Age for the 2006 Scheme. The Government accepted Lord Hutton's rationale and set a Normal Pension Age of 60 to apply in the 2015 scheme. This means that firefighters will continue to have a lower Normal Pension Age than other non-uniformed public servants, for which the proposal is to link retirement to the State Pension Age.

The Normal Pension Age will be subject to regular review. It is anticipated that this will be taken forward by the proposed Scheme Advisory Board to be established under the draft Firefighters' Pension Scheme (Amendment) (Governance) (England) Regulations 2015, which will monitor and collate scheme data and experience. Reviews will consider if the Normal Pension Age remains relevant and will take full account of the economical, efficient and effective management of the fire service including the challenging occupational demands of operational firefighting and the changing profile of the workforce. These reviews will consider the increasing State Pension Age and any changes to it, alongside evidence from interested parties, including unions and employers. The first research into the Normal Pension Age was commissioned by the Department, in agreement with the Firefighters Pension Committee, in Autumn 2012. The research was undertaken by Dr Tony Williams, Medical Director at Working Fit, and his final report was produced in January 2013.

The Office for National Statistics Publication 'Pension Trends' published on 16 February 2012 states that life expectancy for men is less than women; therefore this pension reform could have a larger proportional impact on male firefighters as pensions will be paid to men for a relatively shorter period of time compared to women. However, it should be noted that the Office for National Statistics reported that between 1981 and 2008 female life expectancy has increased at a slower rate than male life expectancy over the period, and the gap is slight, with it narrowing to 2.7 years in 2008.

All members of the 1992 scheme (whose Normal Pension Age is 55), outside of the transitional protections, will see a relative increase in their Normal Pension Age regardless of any protected characteristics. General improvements in longevity across all protected groups mean the impact of this policy is proportionate because people are, generally, spending longer in retirement. Not all current members will move to the 2015 scheme: those who had 10 years or less until their current scheme's Normal Pension Age on 1 April 2012 will remain in their current pension arrangements and will be able to retire under the rules that currently apply. Younger 1992 scheme members can be expected to be affected to a greater degree by the change in Normal Pension Age than older members but should also benefit from improved life expectancy.

Information has been provided by the unions on whether firefighters could work to the

Normal Pension Age of 60. This information has also included issues around female firefighters' fitness levels and whether females could maintain a firefighting role up to age 60.

Dr Williams' review of the Normal Pension Age found that the majority of firefighters are able to work until age 60 provided that they are sufficiently fit when recruited, maintain a healthy lifestyle and undertake a similar level of fitness training to that which is recommended to members of the general public. The report also found that UK firefighters are physically fitter than the general population and modelling shows that the average firefighter at age 35 is fitter than needed to maintain fitness into their mid-60s.

The report considered the impact of the Normal Pension Age on women. According to the report, provided that women are recruited at the right levels of fitness they should also be able to serve as firefighters until age 60. The report also found that whilst fitness in women is lower than for men at all ages, the decline in fitness follows a similar rate when activity levels and body mass index changes are similar. As at 31 March 2012, 56% of regular and retained female firefighters were members of the New Firefighters' Pension Scheme 2006, which already has a Normal Pension Age of 60. These women (as with men) will therefore see no change to their Normal Pension Age as a result of the reforms.

Dr Williams' report also indicated that, of those firefighters that do lose fitness, the vast majority are able to regain their fitness levels following remedial training. Due to the transitional protections in place, the reforms will not impact on the timing of firefighters' retirement until after 2022 and this will give firefighters sufficient time to improve or regain their fitness levels.

The Government consulted on a set of proposed fitness principles which will ensure that no conscientious firefighter will leave the service without access to a job or a pension after they are age 55. The proposals set out that there will be an independent review of the principles three years after they have been issued to assess whether they are being properly implemented, with a statutory underpin through the Fire and Rescue National Framework for England. A further consultation will now take place, with a view to formally placing these principles within the Fire and Rescue National Framework for England. It remains the responsibility of individual fire and rescue authorities, as employers, to ensure that adequate fitness training is provided to firefighters so that they are able to undertake their role. In addition the Government will work with employer and union representatives to set up a fitness working group, under the chairmanship of the Chief Fire and Rescue Adviser, Peter Holland, to consider the issue of firefighter fitness in more depth, and draw up proposals to support the work of fire and rescue authorities.

Future reviews of the Normal Pension Age will continue to consider the impact on gender and other protected groups. Employers' guidance has set out that Fire and Rescue Authorities have a duty to consider whether firefighters that have been injured in the course of duty may be able to perform the duties of another post.

Flexible retirement options

In the 2015 scheme, flexible retirement options (called partial retirement in the regulations) will be put in place so that firefighter members will be able to take their pension from age 55. The Government's earlier proposals were that, from age 57, members who chose to retire early would have their pensions actuarially reduced on the basis of the scheme's Normal Pension Age of 60, rather than on the basis of the deferred pension age (i.e. state pension age or 65 if that is higher). Following consultations, this option has been modified so that firefighters aged 55 – 56 may receive retirement pension on the same actuarial basis as those aged 57 and above. These enhanced actuarial arrangements will improve options for members who choose retire from age 55.

No cap on how much pension can be accrued/members who retire later than the scheme's Normal Pension Age will have their Pension enhanced to recognise that the pension is taken later

There is no evidence to suggest that this will have any detrimental impact on specific groups of firefighters and will be actuarially neutral for the scheme and the member. Because the benefit is actuarially cost neutral, it will not have a disproportionate effect on either male, female, or any other protected groups of firefighters.

A deferred pension age equal to the individuals' State Pension Age

It could be argued that because women live longer than men, female firefighters are more likely to reach State Pension Age and receive a deferred pension. However after November 2018 the State Pension Age for men and women is the same and the gap between life expectancy has decreased in recent years, so this should not have a significant impact.

Optional lump sum commutation at a rate of 12:1 in accordance with HMRC limits and regulations

This proposal mirrors the current provision of the 2006 Scheme and is applied irrespective of age or gender. The majority of firefighters who are members of the 2006 scheme are likely to be younger members. Older firefighters are more likely to be members of the 1992 scheme where current commutation arrangements are

different, in that the amount of lump sum provided is decided by actuarially neutral uni-sex factors provided by the Government Actuary.

It is likely that this proposal will impact on older, longer-serving members of the workforce, although those who were within 10 years of their Normal Pension Age on 1 April 2012 will be fully protected from changes. Where members of the 1992 scheme do not benefit from the transitional provisions, they will receive any pension accrued in that scheme on the terms of that scheme. This will include a right to commute part of their pension on the terms of the 1992 scheme.

As females are considered to live slightly longer in retirement, it could be argued that they receive a lower return on the amount of pension that they choose to commute and they will receive a reduced pension for slightly longer. However, as the commutation factors used in the 1992 and 2006 schemes are the same for men and women the proposals are not significantly different than operate under the current arrangements. The purpose of the commutation factor is not to be actuarially neutral and members will need to make decisions about whether and how much to commute based on a wide range of lifestyle decisions.

Ancillary benefits – maternity leave and ill-health

These benefits will continue to mirror those in the 2006 Scheme. For those members of the workforce who are members of the pension scheme currently open to new members there will be no change – this can be expected to be mostly younger members of the workforce and female firefighters.

Ill-health benefits in both the 1992 and 2006 schemes provide for a lower-tier ill health pension (where a firefighter is permanently disabled for the performance of the duties of his/her role) and also an additional higher tier ill health pension. In the 1992 scheme a higher tier ill health pension is awarded where a firefighter is incapable of undertaking regular employment; in the 2006 scheme a higher tier ill health pension is awarded for firefighters that are permanently disabled for undertaking any other regular employment.

Higher tier pensions in both schemes constitute a pension enhancement. For 1992 scheme members, the lower tier pension, provided that a member has at least five years pensionable service, will take into account the hypothetical pensionable service that the member would have accrued had they continued in employment to the scheme's Normal Pension Age. For 1992 scheme members this takes account of double-accrual after twenty years of service. Hence, for members of the 1992 scheme who transfer to the 2015 scheme there may be an impact and this is most likely to affect older, longer-serving workers. However, the impact will be lessened through the provision of full transitional protections for those within 10 years of their

Normal Pension Age on 1 April 2012, with a further four years' tapering period.

As the ill-health benefits in the 2015 scheme are based on those currently within the 2006 scheme, there will be no adverse impact on those members who transfer from the 2006 scheme that become permanently disabled during their career.

An employer contribution cap (based on cap and share principles) with a symmetrical buffer to provide backstop protection to the taxpayer against unforeseen costs and risks

All members will be affected by the cost cap and floor arrangements regardless of any protected characteristics.

Members rejoining after a period of deferment of less than five years can link new service with previous service, as if they had always been an active member.

This is similar for all the main public service pension schemes. This will benefit members who choose to have a career break, for instance relating to child care, for under a period of five years and return to a firefighting role. This is more likely to benefit females, rather than males, as females are more likely to have career breaks following periods of maternity leave. However, the option to take a career break is equally available to all firefighters, regardless of gender or any other protected characteristic.

Members transferring between public service schemes would be treated as having continuous service.

It is reasonable to assume that this will apply equally to all firefighter members and will have no disproportionate impact on any group with protected characteristics.

Protection for those closest to retirement

The Normal Pension Age in the 1992 Scheme is age 55, for the 2006 Scheme it is age 60. The protection arrangements mean that anyone who was aged 45 years or over in the 1992 scheme, or aged 50 years or over in the 2006 scheme on 1 April 2012, will see no change in the age that they expected to be able to take their benefits, nor the amount of pension they receive. Members who qualify for this protection will remain in their current scheme until they retire.

It is estimated that some 9,429 of 1992 scheme members (or 42.3% of that scheme) and 162 of 2006 scheme regular members (or 3.1% of that scheme) will fall within the 10 year protection. It is estimated that 1,044 of 2006 scheme retained members (or 13.8%) will fall within the 10 year protection. These figures are based on the

valuation data as at 31 March 2012.

As at 31 March 2012, 87% of all female firefighters were aged under 45, compared with 57% of male firefighters in the 1992 scheme. This implies that a higher proportion of female firefighters in the 1992 scheme, compared with male firefighters, will be outside of the 10 year protection period. This could be due to the increase in the number of female firefighters entering the service in more recent years. The proportion of female firefighters in the newer, and current, 2006 scheme aged under 50 and therefore outside the 10 year protection period, is 98% compared with 97% of male firefighters.

Although data is not held, it is recognised that there is the potential for a greater number of firefighters from an ethnic minority being outside the transitional protections due to a gradual increase in the representation of minority ethnic staff in recent years.

The firefighter unions, individual scheme members, and some employers have raised concerns with this policy, with some suggesting that this proposal is discriminatory on the grounds of age and gender. Their claim on age is that younger members, that joined the fire service at the same time as an older member, may fall outside of these transitional arrangements despite the same number of pensionable service years being accrued. Also that younger members who are not protected are, based on trend data, more likely to be female or firefighters from an ethnic minority.

The Department acknowledges that this is an age related provision and has considered the submissions received. The Department does not accept that this is discriminatory on the grounds of age, gender or ethnicity. However, if it was viewed as discriminatory, the Department believes that it can be legitimately justified on the following grounds:

- There is a widely recognised need for reform in terms of economic and demographic changes and to provide any protection when changes are proposed in any pension scheme there will always be instances where members fall just on the wrong side of the protection.
- 10 years of protection is a significant level of protection for those members that are closest to their scheme's Normal Pension Age.
- Members who are more than 10 years from their Normal Pension Age will have more time to make necessary changes to their plans for their eventual retirement.
- It is the Department's view that any discrimination on the basis of age can be objectively justified as a proportionate means to achieve the legitimate aim of the reforms required.

The Department has attempted to lessen the impact by introducing a further four

years of tapered protection for scheme members. Members who were up to 14 years from their current Normal Pension Age, as at 1 April 2012, will have limited protection so that on average, for every month of age they are older than the starting tapered protection point, they gain about 53 days of protection. At the end of the protected period, they will be transferred into the new pension scheme arrangements. It is estimated that around a further 4,714 of 1992 scheme members (21.1%) and 194 of 2006 scheme regular members (3.6%) will be within the tapered arrangements. It is estimated that 864 of 2006 scheme retained members (11.4%) will be within the tapered arrangements.

Secure accrued rights

The protection of a member's accrued rights would be beneficial to all members. However, this would be more beneficial to those who have accrued the most benefits, which are likely to be older white male firefighters. This is a similar position as for those members who are protected under the 1992 scheme arrangements (i.e. double accrual and the right to claim 1992 pension scheme benefits from age 50 when reaching more than 25 years continuous pensionable service).

Retaining the link with a member's final salary at retirement will give the greatest protection to those firefighter members who are expecting the greatest increases in salary before they retire or leave the scheme. Based on current data, this suggests that this would be more beneficial for males that have typically in the past had stronger salary progression to date.

Impacts of protecting the final salary link on specific age groups would depend on the profile of the individual and their future career path. However, moving from a final salary scheme to a career average pension scheme means those firefighter members who previously benefited from these existing distortions will cease to do so.

4. Who has responsibility for developing these policies?

Chris Megainey, Deputy Director of Workforce Pay and Pensions, and Andrew Cornelius, Firefighters' Pension Team Leader.

The policy has been developed in line with broader public service pension scheme policy, on which HMT is the Department with lead policy responsibility.

5. Are there any EU or other statutory regulations that need to be adhered to regarding equalities?

Equality Act 2010 and the Part-time Workers (Prevention of Less Favourable

Treatment) Regulations 2000

6. The following summary will be analysed and used as evidence which you considered in demonstrating due regard to the Public Sector Equality Duty. Have you used information from any of the following sources when developing policies?

Extracts from consultation responses and any follow up responses?

In both the December 2013 and May 2014 consultations, the Department specifically sought comments as to whether any group with a protected characteristic would be disproportionately affected by the proposals and received substantial correspondence relating to the proposed reforms. The issues raised in that correspondence have been considered as part of the reform process, notably regarding the position of members taking early retirement aged 55 – 56.

Any data captured/published?

The Department has made use of the following data sources available to it:

- Valuation data, as of 31 March 2011, collected from Fire and Rescue Authorities
- Valuation data, as of 31 March 2012, collected from Fire and Rescue Authorities
- Data provided to the department (Department for Communities and Local Government's Annual Returns) by Fire and Rescue Authorities as at 31 March 2011
- ONS report 'Pension Trends' published February 2012
- ONS Labour Force Survey – Regional Data June – August 2013

Reference to research/reports?

- Actuarial and occupational health evidence on firefighters pensions submitted by the Fire Brigades Union
- Dr Williams' review of the Normal Pension Age

Minutes of meetings/Notes from stakeholder workshops where equality considerations were addressed/discussed?

- Although no formal minutes were produced, equality considerations have been discussed with the employers and unions at meetings of the Pension Reform Group.

7. Have you discovered any of the following and as a consequence taken actions on identified equality issues?

- *Known difference in needs for those with a protected characteristic, and*
- *Evidence of an adverse equality impact on those with a protected characteristic.*
- *List any actions taken to mitigate against adverse equality impact on those with a protected characteristic*

Regulation 58 of the consultation draft proposed different pension reduction criteria for members retiring at age 55 – 56 than for members retiring between reaching age 57 and their normal pension age. The Department amended the terms of the scheme to ensure that there was no cliff-edge effect based on age, which also removes any risk of discrimination.

The Department has not identified any individuals with protected characteristics who are being adversely affected. Questions have been raised regarding potential age and gender discrimination. The age discrimination claims relate to the transitional protections but the Department has concluded that the protections proposed are objectively justifiable under equalities law.

Regarding gender discrimination and the suggestion that female firefighters may find it more difficult to work for longer, the Department is satisfied that the research by Dr Williams shows that this is not the case. His research into the Normal Pension Age found that whilst fitness in women is lower than for men at all ages, the decline in fitness for women follows a similar rate to men when activity levels and body mass index changes are similar.

However, the Department will continue to monitor and review the impact of the 2015 pension scheme on females, taking into account any further reviews of the Normal Pension Age.

In terms of the various protected groups:

- **Marriage/Civil Partnership:** There is no available data on this protected characteristic in relation to the firefighters' pension scheme. However, the Department has considered the potential impact of scheme reform with regard to this characteristic, and has concluded that no element of the proposed scheme design discriminates against those who are married, or are in a civil partnership, on the basis that the reformed scheme provisions apply irrespective of the marital status of the member.
- **Disability/Religion or Belief/Sexual Orientation/Gender Reassignment:** There is no available data for these protected groups. The Department has concluded that although scheme reform does not discriminate against these groups, nor does it offer the opportunity to advance equality of opportunity and foster good relations.

- Pregnancy and Maternity: Data is not available for this group. The Department has highlighted in this document any potential impact that it thinks that the proposed pension scheme will have on this group. For the purposes of calculation of pension benefits a period spent on maternity leave would be classed as pensionable employment in line with the current scheme arrangements.

8. When your policies are finally implemented which groups are most likely to benefit?

The various policy proposals relating to the 2015 Scheme affect different groups as follows:

- Lower paid members are likely to benefit from the move to a career average scheme
- Members who were ten years from their current scheme's Normal Pension Age on 1 April 2012 will benefit from the full 10 year transitional protection arrangements.
- Members who were up to 14 years from their current scheme's Normal Pension Age on 1 April 2012, will benefit from a further four years of limited tapered protection.

More detail is provided in section 3 above.

9. In considering the above information have any gaps in data or equalities information been identified?

Include your analysis of the Department's role in addressing these gaps. Does the department have a direct role? Or do we need to work with others to close these gaps? If so, please identify who we need to work with.

The following data gaps have been identified:

- Gaps in information on ethnicity in terms of overall scheme membership.
- Gaps in salary progression for the protected groups

The Department is mindful of the need to monitor the ethnicity status of the scheme membership, to better inform future equality assessments. The Department surveyed fire and rescue authorities to see whether information on membership of the pension scheme could be provided by ethnicity and for other protected groups. However, approximately just half of authorities said that the information could be submitted to the Department by ethnicity. As such, the Department has concluded

that, given the additional burden it would place on individual fire and rescue authorities, it would not be proportionate to collect detailed scheme membership by ethnicity. However, the Department has started to collect information on firefighters opting out of the scheme by ethnicity.

In addition, although Dr. Williams' report provided evidence of the effect of working to age 60 as a firefighter, we will continue to review the impact of a growing proportion of firefighters working to age 60 through the scheme advisory board.

10. Overall, can you make an assessment of the potential of this policy; programme/service to have a substantial equalities impact on discrimination, fostering good relations or advancing equality of opportunity? Please try to limit your answer here to less than an A4 page.

The policies are not expected to have any disproportionate effect on any of the protected groups. The majority of proposals will apply to all pension scheme members equally.

**This analysis was undertaken by Sharon Mayers/Andrew Cornelius/Philip Perry
Advice sought from (Name of equality Champion or other Colleagues) :**

Name/Title	Hyacinth Parsons		
Directorate/Unit	Equalities Team	Lead contact	Philip Perry
Date	24 May 2014	Date	23 October 2014

SCS Sign off – Chris Megainey, Workforce Pay and Pensions

I have read the available evidence and I am satisfied that this demonstrates compliance, where relevant, with Section 149 of the Equality Act and that due regard has been made to the need to: eliminate unlawful discrimination; advance equality of opportunity; and foster good relations.

Please keep a record of this analysis for audit purposes and send a copy to errol.barnett@communities.qsi.gov.uk for his records

Main scheme design parameters for a new Firefighters' Pension Scheme

- a career average pension scheme design
- active members' career average benefits to be revalued in line with average earnings
- pensions in payment and deferred benefits to increase in line with Prices Index (currently Consumer Price Index)
- average member contributions of 13.2% from April 2015, with protection for new entrants
- an accrual rate of $1/59.7^{\text{th}}$ (equivalent to around 1.68%) of pensionable earnings each year.
- Normal Pension Age of 60, subject to regular review.
- flexible retirement from the scheme's minimum pension age of 55, built around the scheme's Normal Pension Age of 60, with active members aged 55 or more at retirement able to take their pension from minimum pension age, with 2015 scheme benefits taken before Normal Pension Age to be actuarially reduced with reference to the 2015 Scheme's Normal Pension Age, rather than the deferred pension age
- no cap on how much pension can be accrued
- members who retire later than the scheme's Normal Pension Age will have their pension enhanced to recognise this
- a deferred pension age equal to the individual's State Pension Age
- optional lump sum commutation at a rate of 12:1 in accordance with HM Revenue and Customs limits and regulations
- ill-health retirement benefits and all other ancillary benefits to be based on the arrangements in the New Firefighters' Pension Scheme 2006
- an employer contribution cap (based on cap and share principles) with a symmetrical buffer to provide backstop protection to the taxpayer against unforeseen costs and risks, as well as the chance for members to improve benefits if the costs of the scheme fall below a fixed point.
- members rejoining after a period of deferment of less than six years can link new service with previous service, as if they had always been an active member.
- members transferring between public service schemes would be treated as having continuous service.

Protection for those close to retirement

- Active scheme members who, as of 1 April 2012, had 10 years or less to their current Normal Pension Age will see no change in when they can retire, nor any decrease in the amount of pension they receive when they retire.
- A further 4 years of tapered protection for scheme members so that members who were up to 14 years from their current Normal Pension Age on 1 April 2012, will be eligible for an additional degree of protection, in the form of further accrual in their existing scheme. At the end of the protected period, they will be transferred into the new scheme pension arrangements.

Secure accrued rights

There are currently two Firefighters Pension schemes: the Firefighters Pension Scheme 1992 (“the 1992 scheme”) which closed to new membership from 6 April 2006; and the existing New Firefighters Pension Scheme 2006 (“the 2006 scheme”).

- All rights accrued under final salary arrangements in the 1992 scheme, or 2006 scheme, will be linked to members’ final salary when they retire or leave the 2015 pension scheme.

For members of the 1992 scheme, the Government will further meet:

- Members’ expectation to double accrual for service accrued under the 1992 scheme, so that a member’s full continuous pensionable service upon retirement will be used to calculate an averaged accrual rate up to a maximum accrual rate of 1/45ths
- members’ expectation to be able to access their 1992 scheme benefits, when they retire, from age 50 with 25 or more years pensionable service. Pensionable service for the purpose of calculating access to the pension will include any continuous pensionable service accrued under both the 1992 scheme and the 2015 scheme.
- members’ expectation to an actuarially assessed commutation factor for benefits accrued under the 1992 scheme.

Annex B

Table 1: Membership of the Firefighters' Pension Schemes by Gender

[Source: Government Actuary Department's Valuation Data
31 March 2012]

Pension Scheme	Male		Female		Total	
	Number	%	Number	%	Number	%
Firefighters Pension Scheme 1992	21,649	97%	647	3%	22,296	100%
Regular membership of the New Firefighters Pension Scheme 2006	4,799	91%	500	9%	5,299	100%
Retained membership of the New Firefighters Pension Scheme 2006	7,213	95%	341	5%	7,554	100%
Total	33,661	96%	1,488	4%	36,214	100%

Tables 2: Membership of the Firefighters' Pension Schemes by Gender and Age
 [Source: Government Actuary Department's Valuation Data 31 March 2012]

Table 2a Membership of the Firefighters Pension Scheme 1992

Age category	Male		Female		Total	
	Number	%	Number	%	Number	%
Under 41	7,718	95%	435	5%	8,153	100%
41-45	4,583	97%	131	3%	4,714	100%
45-50	6,333	99%	70	1%	6,403	100%
Over 50	3,015	100%	11	0%	3,026	100%
Total	21,649	97%	647	3%	22,296	100%

Table 2b Regular Membership of the New Firefighters' Pension Scheme 2006

Age category	Male		Female		Total	
	Number	%	Number	%	Number	%
Under 41	4,056	90%	450	10%	4,506	100%
41-45	339	91%	33	8%	372	100%
45-50	250	97%	9	4%	259	100%
Over 50	154	95%	8	3%	162	100%
Total	4,799	91%	500	9%	5,299	100%

Table 2c Retained Membership of the New Firefighters' Pension Scheme 2006

Age category	Male		Female		Total	
	Number	%	Number	%	Number	%
Under 41	4,153	94%	244	6%	4,397	100%
41-45	982	96%	41	4%	1,023	100%
45-50	1,053	97%	37	3%	1,090	100%
Over 50	1,025	98%	19	2%	1,044	100%
Total	7,213	95%	341	5%	7,554	100%

Tables 3: Membership of the Firefighters Pension Scheme by Gender (M) and Female (F), Age and Salary Band

[Source: Government Actuary Department's Valuation Data 31 March 2012]

Table 3a: Number of members of the Firefighters' Pension Scheme 1992

FTE Salary/ Age	Under 30		30-40		40-45		45-50		50-55		Over 55		Total	
	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Up to £30K	352	20	3,305	218	2,457	81	2,282	22	932	1	62	0	9,390	342
£30K - £35K	196	10	2,077	115	1,797	43	1,775	21	763	4	55	0	6,663	193
£35K - £40K	20	2	520	32	807	17	1,144	13	542	3	56	1	3,089	68
£40K - £50K	1	0	146	3	370	11	685	8	330	2	17	0	1,549	24
£50K - £60K	0	0	46	3	141	9	273	6	145	0	13	0	618	18
£60K - £100K	0	0	9	0	48	2	126	0	62	0	10	0	255	2
£100K - £120K	0	0	1	0	2	0	23	0	9	0	1	0	36	0
Over £120K	0	0	0	0	6	0	25	0	16	0	2	0	49	0
Totals	569	32	6,104	371	5,628	163	6,333	70	2,799	10	216	1	21,649	647

Table 3b: Percentage of ages in each salary band for members of the Firefighters' Pension Scheme 1992

Full Time Equivalent Salary/Age	Under 30		30-40		40-45		45-50		50-55		Over 55	
	M	F	M	F	M	F	M	F	M	F	M	F
Up to £30K	4%	6%	35%	64%	26%	24%	24%	6%	10%	0%	1%	0%
£30K - £35K	3%	5%	31%	60%	27%	22%	27%	11%	11%	2%	1%	0%
£35K - £40K	1%	3%	17%	47%	26%	25%	37%	19%	18%	4%	2%	1%
£40K - £50K	0%	0%	9%	13%	24%	46%	44%	33%	21%	8%	1%	0%
£50K - £60K	0%	0%	7%	17%	23%	50%	44%	33%	23%	0%	2%	0%
£60K - £100K	0%	0%	4%	0%	19%	100%	49%	0%	24%	0%	4%	0%
£100K - £120K	0%	0%	3%	0%	6%	0%	64%	0%	25%	0%	3%	0%
Over £120K	0%	0%	0%	0%	12%	0%	51%	0%	33%	0%	4%	0%
Totals	3%	5%	28%	57%	26%	25%	29%	11%	13%	2%	1%	0%

Table 3c: Number of regular members of the New Firefighters' Pension Scheme 2006

Full Time Equivalent Salary/Age	Under 30		30-40		40-45		45-50		50-55		Over 55		Total	
	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Up to £30K	1,658	195	1,536	158	314	39	141	4	47	3	30	1	3,726	400
£30K - £35K	288	21	423	47	106	7	82	3	29	2	15	0	943	80
£35K - £40K	13	3	32	8	14	2	22	1	12	2	10	0	103	16
£40K - £50K	1	0	5	3	2	0	3	0	3	0	2	0	16	3
£50K - £60K	0	0	0	0	2	0	1	1	3	0	0	0	6	1
£60K - £100K	0	0	1	0	0	0	1	0	0	0	1	0	3	0
£100K - £120K	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Over £120K	0	0	0	0	0	0	0	0	1	0	1	0	2	0
Totals	1,960	219	1,997	216	438	48	250	9	95	7	59	1	4,799	500

Table 3d: Percentage of ages in each salary band for regular members of the New Firefighters' Pension Scheme 2006

Full Time Equivalent Salary/Age	Under 30		30-40		40-45		45-50		50-55		Over 55	
	M	F	M	F	M	F	M	F	M	F	M	F
Up to £30K	44%	49%	41%	40%	8%	10%	4%	1%	1%	1%	1%	0%
£30K - £35K	31%	26%	45%	59%	11%	9%	9%	4%	3%	3%	2%	0%
£35K - £40K	13%	19%	31%	50%	14%	13%	21%	6%	12%	13%	10%	0%
£40K - £50K	6%	0%	31%	100%	13%	0%	19%	0%	19%	0%	13%	0%
£50K - £60K	0%	0%	0%	0%	33%	0%	17%	100%	50%	0%	0%	0%
£60K - £100K	0%	0%	33%	0%	0%	0%	33%	0%	0%	0%	33%	0%
£100K - £120K	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Over £120K	0%	0%	0%	0%	0%	0%	0%	0%	50%	0%	50%	0%
Totals	41%	44%	42%	43%	9%	10%	5%	2%	2%	1%	1%	0%

Table 3e: Number of retained members of the New Firefighters' Pension Scheme 2006

Full Time Equivalent Salary/Age	Under 30		30-40		40-45		45-50		50-55		Over 55		Total	
	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Up to £30K	1,814	115	1,783	101	866	49	673	35	375	12	165	4	5,676	316
£30K - £35K	52	1	248	10	279	6	287	2	228	3	109	0	1,203	22
£35K - £40K	3	0	26	0	50	1	81	0	73	0	64	0	297	1
£40K - £50K	1	1	4	1	1	0	8	0	6	0	1	0	21	2
£50K - £60K	3	0	1	0	1	0	2	0	3	0	0	0	10	0
£60K - £100K	0	0	0	0	1	0	2	0	0	0	1	0	4	0
£100K - £120K	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Over £120K	0	0	1	0	1	0	0	0	0	0	0	0	2	0
Totals	1,873	117	2,063	112	1,199	56	1,053	37	685	15	340	4	7,213	341

Table 3f: Percentage of ages in each salary band for retained members of the New Firefighters' Pension Scheme 2006

Full Time Equivalent Salary/Age	Under 30		30-40		40-45		45-50		50-55		Over 55	
	M	F	M	F	M	F	M	F	M	F	M	F
Up to £30K	32%	36%	31%	32%	15%	16%	12%	11%	7%	4%	3%	1%
£30K - £35K	4%	5%	21%	45%	23%	27%	24%	9%	19%	14%	9%	0%
£35K - £40K	1%	0%	9%	0%	17%	100%	27%	0%	25%	0%	22%	0%
£40K - £50K	5%	50%	19%	50%	5%	0%	38%	0%	29%	0%	5%	0%
£50K - £60K	30%	0%	10%	0%	10%	0%	20%	0%	30%	0%	0%	0%
£60K - £100K	0%	0%	0%	0%	25%	0%	50%	0%	0%	0%	25%	0%
£100K - £120K	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Over £120K	0%	0%	50%	0%	50%	0%	0%	0%	0%	0%	0%	0%
Totals	26%	34%	29%	33%	17%	16%	15%	11%	9%	4%	5%	1%

Tables 4: Role of firefighters (total workforce) broken down by gender and ethnicity
 [Source: Department for Communities and Local Government's Annual Returns]

Table 4a: Role of regular firefighters (total workforce) by gender as at 31 March 2013
 Information available for Brigade Manager and below

Role	Men		Women		Total	
	Number	%	Number	%	Number	%
Brigade Manager	138	97%	4	3%	142	100%
Area Manager	176	97%	6	3%	182	100%
Group Manager	552	98%	13	2%	565	100%
Station Manager	1,415	97%	40	3%	1,455	100%
Watch Manager	4,042	97%	134	3%	4,176	100%
Crew Manager	3,636	96%	133	4%	3,769	100%
Firefighter	16,140	95%	924	5%	17,064	100%
Total	26,099	95%	1,254	5%	27,353	

Table 4b: Role of retained firefighters (total workforce) by gender as at 31 March 2013
 Information available for Group Manager and below

Role	Male		Female		Total	
	Number	%	Number	%	Number	%
Group Manager	0	0%	-	0%	0	0%
Station Manager	38	100%	-	0%	38	100%
Watch Manager	1,069	99%	9	1%	1,078	100%
Crew Manager	2,146	98%	39	2%	2,185	100%
Firefighter	9,682	96%	453	4%	10,135	100%
Total	12,935	96%	501	4%	13,436	

Table 4c: Ethnicity of regular firefighters at 31 March 2013

Information available by Brigade Manager and below – see table 4e for further detail that gives a breakdown by ethnic origin

Role	White, British or Irish or any other white background		Minority Ethnic Background		Ethnic Origin not stated		Total	
	Number	%	Number	%	Number	%	Number	%
Brigade Manager	133	94%	1	1%	8	6%	142	100%
Area Manager	163	90%	7	4%	12	7%	182	100%
Group Manager	534	95%	10	2%	21	4%	565	100%
Station Manager	1,356	93%	29	2%	70	5%	1455	100%
Watch Manager	3,753	90%	139	3%	284	7%	4176	100%
Crew Manager	3,402	90%	132	4%	235	6%	3769	100%
Firefighter	14,951	88%	906	5%	1,207	7%	17064	100%
Total	24,292	89%	1,224	4%	1,837	7%	27,353	100%

Table 4d: Ethnicity of retained duty system firefighters at 31 March 2013

Information available by Group Manager and below – see table 4f that gives a breakdown by ethnic origin

Role	White, British or Irish or any other white background		Minority Ethnic Background		Ethnic Origin not stated		Total	
	Number	%	Number	%	Number	%	Number	%
Group Manager	0	0%	0	0%	0	0%	0	100%
Station Manager	30	79%	0	0%	8	21%	38	100%
Watch Manager	956	89%	3	0%	119	11%	1078	100%
Crew Manager	1,933	88%	12	1%	240	11%	2185	100%
Firefighter	8,720	86%	124	1%	1,291	13%	10135	100%
Total	11,639	87%	139	1%	1,658	12%	13436	100%

Table 4e: Ethnicity of regular firefighters at 31 March 2013, by ethnic origin

Information available by Brigade Manager and below

Role	White British or Irish	Any other white background	Mixed	Asian or Asian British	Black or Black British	Any other Minority Ethnic Background	Ethnic origin not Stated
Brigade Manager, Area Manager, Group Manager	813	17	9	3	3	3	41
Station Manager	1,322	34	9	7	9	4	70
Watch Manager	3,604	149	47	16	60	16	284
Crew Manager	3,282	120	48	17	51	17	235
Firefighter	14,459	492	320	137	359	90	1,207
Total	23,480	812	433	180	482	129	1,837

Table 4f: Ethnicity of retained duty system firefighters at 31 March 2013, by ethnic origin

Information available by Brigade Manager and below

Role	White British or Irish	Any other white background	Mixed	Asian or Asian British	Any other Minority Ethnic Background	Ethnic origin not Stated
Group Manager	0	0	0	0	0	0
Station Manager	30	0	0	0	0	8
Watch Manager	944	12	0	0	3	119
Crew Manager	1,911	22	6	3	3	240
Firefighter	8,536	184	67	17	40	1,291
Total	11,421	218	73	20	46	1,658