



Department for
Communities and
Local Government

Firefighters' Pension Scheme: Transitional arrangements for the Firefighters' Pension Scheme 2015 and the Firefighters' Compensation Scheme 2006, and amendments to the New Firefighters' Pension Scheme 2006 and the Firefighters' Pension Scheme 1992

Updated Equality Statement



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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.

Include, brief:

- *Details of policy aims, and*
- *What outcomes it will achieve*

This Equality Statement has been produced in accordance with the Department's legal requirement to comply with the Public Sector Equality Duty (PSED), which is found at section 149 of the Equality Act 2010. It has been produced for the transitional arrangements for the Firefighters' Pension Scheme 2015 (the "Transitional Arrangements"), and the Firefighters' Compensation Scheme 2006 (the "Compensation Scheme"). It also covers amendments to the New Firefighters' Pension Scheme 2006 and to the retained section of that Scheme (the "Modified Scheme"), which forms part of the same statutory instrument. Finally, it considers the uprating of all contribution bands by 1% per annum to 1 April 2018 in the 1992 and 2006 schemes which form part of the amendments to the New Firefighters' Pension Scheme 2006 and the amendments to the Firefighters' Pension Scheme 1992. The equalities statement for the changes to the Modified Scheme and in respect of the contribution bands are included at the end of each section, with the first part of each section addressing the changes proposed to the Transitional Arrangements, and then the Compensation Scheme.

The Transitional Arrangements relate to the movement of firefighters from their existing 1992 or 2006 schemes into the 2015 Scheme. The regulations for the 2015 Scheme are outlined in The Firefighters' Pension Scheme (England) Regulations 2014 (S.I. 2014/2848). The Equality Statement was produced for these regulations in November 2014 can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/367671/Firefighters_Pension_Scheme_2015_Equality_Statement.pdf

The Department has decided to update the main scheme Equalities Statement (referred to in the paragraph above) to include the equalities assessment relating to the Transitional Arrangements, the Compensation Scheme, and the Modified Scheme. This provides interested parties with an Equalities Statement that assesses the 2015 Scheme as a whole.

Policy History

The Government's overall policy aim was 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. In the 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:

- 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, which will be introduced from 1 April 2015, are set out at **Annex A**.

The move of existing firefighters to the 2015 Scheme will be governed by the Transitional Arrangements. These are outlined in the consultation document and the Government's response, and summarised in this equality statement. The consultation documents can be found at: <https://www.gov.uk/government/consultations/firefighters-pension-schemes-transitional-arrangements>

The policy aim of the Transitional Arrangements is to protect the rights that members have accrued in previous pension schemes, and to ensure that they are appropriately

reflected in the benefits which members receive as active members of the 2015 Scheme.

The Compensation Scheme provides compensatory benefits for qualifying firefighters who are injured on duty. In the Compensation Scheme, several provisions make reference to the terms of the pension scheme to which the firefighter is a member. With the introduction of the 2015 Scheme, there will be members who have moved into the 2015 Scheme from either the 1992 or 2006 Scheme. The changes to the Compensation Scheme are required to ensure that where appropriate, it makes reference to, and therefore accounts for, 2015 Scheme members and those who have moved into that scheme from the 1992 or 2006 schemes.

The Modified Scheme was introduced on 1 April 2014 to provide pension benefits to firefighters employed as retained firefighters between 1 July 2000 and 5 April 2006. These benefits are comparable to those that were available to regular firefighters during that period (the 1992 Scheme). Fire and rescue authorities have until 1 April 2015 to complete the necessary steps to enrol qualifying members. The Department has been approached by a number of authorities who are concerned that they will not meet this deadline. Therefore, the Government is proposing to extend the time available to fire and rescue authorities to complete the enrolment process by 6 months, meaning that the new deadline will be 30 September 2015.

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 firefighters pension scheme 2015 ("2015 Scheme") on the groups set out below. To inform that Equality Statement, the Department sought views on the potential impact on protected groups as part of its two consultations on the draft 2015 Scheme regulations, beginning in December 2013 and May 2014. It should be noted that the regulations that were subject to consultation focused on the benefits for the 2015 Scheme. A consultation on the proposals for new governance arrangements ran from 10 October to 21 November. There has now been a separate, further, consultation on the detailed transitional arrangements for 1992 and 2006 Scheme members transferring to the 2015 Scheme. This consultation ran from 22 January to 19 February 2015. (It also consulted on the Compensation Scheme, and the Modified Scheme, which are discussed later.) For completeness, all aspects of the

overall scheme design have been included in this Equality Statement.

The Transitional Arrangements serve to govern the movement of certain, defined members from their existing scheme to the 2015 Scheme. The provisions determining which members remain in pensionable service in their existing scheme are included in the Firefighters' Pension Scheme (England) 2014 Regulations, and as such, have been previously consulted upon. As set out above, to assist the reader this Equality Statement includes the assessment made in respect of the 2014 Regulations following that consultation. The Department has considered how the transitional arrangements will affect each of the different groups with protected characteristics. It has concluded that, as set out in the sections describing the ancillary benefits, commutation rates and the securing of accrued rights, that the Transitional Arrangements will have no disproportionate impact on any group with protected characteristics.

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

An assessment has been provided for the key aspects of pension scheme design. It should be noted that the overall value of a pension depends on unique individual factors that fall 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 individuals 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 and its transitional arrangements are 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 of this 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, the roles of Assistant, Deputy and Chief Fire Officer make up less than 1% of the overall 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. Overall firefighter’s workforce data shows that, as of 31 March 2013, 66% of white firefighters (regular and retained) occupy the role of ‘firefighter’, compared to 73% of minority ethnic firefighters who 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, 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 currently serving female firefighters and

firefighters from ethnic minorities entered the fire service in more recent years. This might be part of the reason why proportionately more white males currently 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 in itself create differential impacts on different groups. However, moving from a final salary scheme to a career average pension scheme means that those firefighter members who previously benefited from the distortions created by final salary schemes will cease to do so. Lower earners, 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 higher earners 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 financial 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 noted that higher earners also live longer, on average, than lower paid workers.

Taking the above into consideration, the Department considers 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, to be 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 resulting from 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.

An initial 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 on 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. It is also important to note that 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 design of the pension reforms means that a firefighter entering the 2015 scheme, who remains a member throughout their career, 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 have received in the 2006 Scheme. The Government consider this outcome to be 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 the new 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 recommended that 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 whom the proposal is to link retirement to the State Pension Age.

The Normal Pension Age will be subject to regular review. 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. Periodic 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 in the period between 1981 and 2008, female life expectancy has increased at a slower rate than male life expectancy, and the gap is decreasing: narrowing to 2.7 years in 2008.

All members of the 1992 Scheme (whose Normal Pension Age is 55), who fall 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.

The Department has received information from the unions regarding whether or not 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 indicated that modelling shows that the average firefighter at age 35 is fitter than is needed to maintain fitness into their mid-60s.

Dr Williams also 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 to that of men 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 has 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 took place in October – December 2014, as a result of which fitness principles were formally placed within the Fire and Rescue National Framework for England. The consultations document and Government response can be found at: <https://www.gov.uk/government/consultations/firefighter-fitness-standards-and-assessment>.

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. An additional requirement has been added to The Fire and Rescue National Framework for England, which fire and rescue authorities must have regard to, for those firefighters who fail a fitness test through no fault of their own, have no underlying medical condition that would entitle them to ill-health retirement, and are unable to regain fitness with remedial support. In these circumstances, the fire and rescue authority should consider suitable alternative employment and, if that is not possible and the employee is at least aged 55, should also consider initiating an authority initiated retirement to pay an unreduced pension.

In addition the Government has worked 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 was 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 male, female, or any 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. Similarly, where a member is awarded a lower tier ill-health pension in the 2015 Scheme, the mechanism set out in the Transitional Regulations to determine this pension will ensure that members with 1992 Scheme pensionable service are still able to access the 1992 Scheme commutation rates in respect of that service, even though the pension is paid from the 2015 Scheme. This will help to mitigate the impact of moving into the 2015 Scheme, including those older members who are more likely to be affected by this change.

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, ill-health and survivor benefits

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 ill-health pensions in both the 1992 and 2006 schemes effectively constitute a pension enhancement and a lower tier ill-health pension. For 2006 Scheme members any higher tier pension, provided that a member has at least five years' pensionable service, will take account of the prospective pensionable service that the member would have accrued had they continued in employment to Normal Pension Age. For 1992 Scheme members, any higher tier ill-health pension will include service enhancements relating to the individual's accrued pensionable service.

Once a member has moved into the 2015 Scheme, their ill-health benefits will be paid from the 2015 Scheme. The transitional arrangements ensure that where an active 2015 Scheme member who has 1992 or 2006 scheme service, is not treated as a deferred member of that Scheme, some consideration is given to the lower tier ill-health pension that would have been awarded in respect of that service. Although the ill-health pension is paid from the 2015 Scheme, it will include an amount equivalent to that which would have been paid under the 1992 or 2006 scheme, in respect of the member's earlier scheme service. The higher tier calculation is based on an enhancement to a lower tier ill-health pension, and so will already include this "equivalent amount" for transition members.

However, there may be cases where a member who has moved into the 2015 Scheme from the 1992 Scheme receives a lower higher tier ill-health pension. Where this circumstance arises, it does so because the member is no longer a protected member of the 1992 Scheme. However, the impact of the ill-health changes in the 2015 Scheme 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. The Department assessed the equalities impact of the transitional protections when producing the Equalities Statement for the 2015 Scheme and considered that they were objectively justified as proportionate, to achieve the legitimate aims of the reforms.

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.

As with the ill-health benefits, survivors' benefits will also be paid from the 2015 Scheme where a member has active 2015 Scheme membership. Survivor benefits are calculated with reference to the ill-health benefits. As such, if the member also has active membership in the 1992 or 2006 scheme, then the benefits reflecting the lower

tier ill-health pension will also include the “equivalent amount” that was calculated using the 1992 or 2006 scheme rules. As with the higher ill-health provisions, some survivor benefits paid in respect of members with active 2015 and 1992 scheme service will be better than would have been paid under the 1992 Scheme, others will have a lower entitlement.

However, case of civil partners of members of the 2015 Scheme, will receive a more generous survivor benefit than they would have done under the 1992 Scheme. This is because the 1992 Scheme does not allow pensionable service before 1988 to be taken into account when determining the award for a surviving civil partner. No equivalent reduction will be made for members of the 2015 Scheme.

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.

The Department considers that 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 in the 1992 Scheme were aged under 45, compared with 57% of male firefighters. This implies that a higher proportion of female firefighters in the 1992 Scheme, compared with male firefighters, will be outside of the 10 year transitional 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 specific data is not held by the Department, 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 a younger member, who 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. It is also claimed that that younger members who are not protected by transitional arrangements are, based on trend data, more likely to be female or firefighters from an ethnic minority.

The Department acknowledges that the protection for those closest to retirement 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 result in instances where some 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 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 will 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 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 who 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.

The transitional arrangements provide a mechanism to allow all members of the 1992 Scheme the opportunity to recognise the accrual rate that they would have achieved in respect of that service, had they remained in pensionable service in the 1992 Scheme. The Regulations ensure that a member's full continuous pensionable service upon retirement will be used to calculate an averaged accrual rate up to a maximum of 1/45ths. This provision will benefit those members who have accrued the most service

in the 1992 Scheme, who are likely to be older white male firefighters. However, the extent to which a member will benefit from this provision is determined by the 2015 Scheme Regulations and the protection for those closest to retirement. As set out in the original Equalities Statement, the Department considers that any alleged discrimination on the basis of age can be objectively justified as proportionate to the legitimate aims of the policy.

The Transitional Regulations

The Transitional Regulations set out how those who have been moved into the 2015 Scheme from the 1992 or 2006 Scheme will be treated. They do not determine whether an individual qualifies for full or tapered protection. This has already been determined by the 2015 Scheme Regulations and the question of potential age discrimination assessed in the corresponding Equalities Statement.

Those who are subject to tapered protection and whose treatment is described in the Transitional Regulations, will be subject to the same or similar treatment from the point at which they join the 2015 Scheme, regardless of any protected characteristic. The Department therefore considers that there is no disproportionate impact on any of the protected groups.

The Compensation Scheme

The Compensation Scheme provides compensatory benefits for qualifying firefighters who are injured on duty. In the scheme, the calculation of the benefit makes reference to the terms of the pension scheme to which the firefighter is, or is eligible to be a member. The Government is amending the Compensation Scheme to ensure that, where appropriate, it makes reference to, and therefore accounts for, transitional members and the 2015 Scheme.

Since the amendment serves to ensure that the existing compensation arrangements apply to transitional members and 2015 Scheme members, it is the Department's view that the Compensation Scheme will have no disproportionate impact on any group with protected characteristics.

The Modified Scheme

The Modified Scheme was introduced on 1 April 2014 to provide pension benefits to firefighters employed as retained firefighters between 1 July 2000 and 5 April 2006. These benefits are comparable to those that were available to firefighters during that period under the 1992 Scheme. Fire and rescue authorities have until 31 March 2015 to complete the necessary steps to enroll qualifying members who have elected to join the Modified Scheme. The Department has been approached by a number of

authorities who believe that they will not meet this deadline. Therefore, the Government is proposing to extend the time available to fire and rescue authorities to complete this enrolment process by 6 months, meaning that the new deadline will be 30 September 2015.

The Department previously consulted on these amendments, and the relevant documents can be found at: <https://www.gov.uk/government/consultations/retained-firefighters-pension-settlement-consultation>.

Since the proposal is ultimately procedural – amounting to an extension in the time available to fire and rescue authorities to complete the enrolment of eligible firefighters who have made a formal elected to join the Modified Scheme – it is the Department’s view that the amendments will have no disproportionate impact on any group with protected characteristics.

However, the proposed changes to the Modified Scheme also address omissions in the current provisions. Individuals who elect to convert special service to their standard membership and are required to buy any break in scheme membership between 6 April 2006 and the date they joined the standard 2006 Scheme do not have interest applied. The original policy intention was to require interest to be paid on the contributions. The proposed amendment is designed to reaffirm the original policy intention and reflect this within the regulations. Since the proposal applies equally to all qualifying members, it is the Department’s view that no group with protected characteristics will be disproportionately affected.

Changes to the contribution bands in the 1992 and 2006 schemes

The 1992 and 2006 schemes set out contribution bands which determine the rate of contributions a member should pay, based on their pensionable pay. The contribution bands for the 1992 Scheme, 2006 Scheme and special members of the 2006 Scheme, will be uprated by 1% each year until 2018-19. This is consistent with the approach taken in the 2015 Scheme and would mean that if a firefighter received a pay rise to reflect inflation, they would not inadvertently be moved into a higher contribution band.

The changes are being applied to all members of the firefighters’ pension scheme, regardless of whether they are part time or which scheme are a member of. As such, the Department considers that no group with a protected characteristic will be disproportionately affected.

4. Who has responsibility for developing these policies?

Chris Megainey, Deputy Director of Workforce, Pay and Pensions

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.

In the January 2015 consultation, the Department also specifically asked consultees to consider whether or not there were any further equality issues concerning the draft regulations. The draft regulations pertain to the Transitional Arrangements, which govern the transitional protections for members; the Compensation Scheme, which is being updated to apply to qualifying transitional and 2015 Scheme members; and the Modified Scheme, which extends the time available to employers by 6 months (to 30 September 2015) to undertake the enrolment process to provide pension benefits to firefighters employed as retained firefighters between 1 July 2000 and 5 April 2006.

The majority of respondents (seven out of the 11 received) did not consider there to be any further equality issues. One respondent did not feel able to comment.

Several respondents raised issues already covered by the Equality Statement for the 2015 Scheme regulations, such as the determination of tapered and full protection. The Government believe that these issues have been adequately addressed in this Updated Equality Statement.

Two respondents noted that the Department does not hold data on certain groups with protected characteristics, meaning that it is difficult to fully assess any potential equality issues relating to these groups. The Government believes that a full equalities assessment has been carried out, using the best information available from fire and rescue authorities.

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 in 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
- All members will benefit from the updating of the Compensation Scheme, which will mean that compensatory injury payments will continue to be paid for all qualifying members under transitional protection and in the 2015 Scheme
- Firefighters employed as retained firefighters between 1 July 2000 and 5 April 2006 will benefit from an extension of 6 months (to 1 October 2015) in the time available for fire and rescue authorities to complete the enrollment exercise.
- Civil partners of members of the 1992 Scheme who have moved into the 2015 Scheme, will receive a more generous survivor benefit than they would have done in the 1992 Scheme as they will no longer see any reduction of pensionable service for service accrued before 1988.

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/James Livingston/Victoria Edwards

Advice sought on the original statement from (Name of equality Champion or other Colleagues):

Name/Title	Hyacinth Parsons		
Directorate/Unit	Equalities Team	Lead contact	James Livingston
Date	24 May 2014	Date	03 March 2015

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.gsi.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 1/59.7th (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 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

Compensation Order

- the Compensation Order will continue to apply for all qualifying firefighters, including those under transitional or full protection, and those in the 2015 Scheme.

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

[Source: Government Actuary's Department 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's Department 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 (Male (M) and Female (F)), Age and Salary Band

[Source: Government Actuary's Department 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