

**UK POLICE PENSIONS CONSULTATIVE FORUM & SCHEME ADVISORY  
BOARD MEETING**

26th Meeting, 12 May 2021, 10:30 – 14:30

Minutes

**Members present:**

**Independent Chair**

Julia Mulligan

**Secretariat**

Afsana Begum

**Police Federation of England and Wales (PFEW)**

Alex Duncan (SAB Member)

John Partington

Calum Macleod

Hayley Aley

Mike Brown

Gemma Lofts

**Police Superintendents' Association (PSA)**

Dan Murphy (SAB Member)

**Association of Police and Crime Commissioners (APCC)**

Andy Tremayne (SAB Member)

**Chief Police Officers' Staff Association (CPOSA)**

Shabir Hussain (SAB Member)

**National Police Chief's Council (NPCC)**

James Hurley (SAB Member)

Kevin Courtney

**National Association of Retired Police Officers (NARPO)**

Steve Edwards (SAB Member)

**Home Office (HO)**

Frances Clark

Cat Weston

Tahmina Ahmed

Rosetta Thomas

**Scottish Police Federation (SPF)**

Calum Steele

**Superintendent's Association of Northern Ireland (SANI)**

Represented by PSA

**Association of Scottish Police Superintendents (ASPS)**  
Craig Suttie

**Scottish Government**  
Iain Coltman

**Police Federation Northern Ireland (PFNI)**  
Liam Kelly

**Department of Justice, Northern Ireland (DoJNI)**  
Antonia Hoskins

**Scottish Police Authority**  
Sharon Dalli  
John McLean

### **Welcome and apologies**

1. The Chair welcomed members to her first UKPPCF and Police Pensions SAB meeting.
2. The Superintendents' Association of Northern Ireland (SANI) were represented by PSA.

### **Minutes of the meeting 11 January 2021**

3. The minutes of the previous quarterly meeting were agreed. **Action Point 1: Secretariat to publish finalised minutes of 11 January 2021 on webpage.**

### **Action log of 11 January 2021**

4. *The Chair went through the action log of 6 October, which has been updated in the light of discussion. Key points discussed were:*

Action Point 4 (HO Comms package) – HO shared a draft framework of the comms package on 15 March however PSA said there needed to be details and engagement on the comms package before it was released. HO agreed. **Action Point 2: HO to provide details on HO Comms Package to SAB before it is published.**

Action Point 5 (TWG meeting post HMT consultation response) – A TWG meeting was held in February. A finalised version of minutes had not been circulated to Members. **Action Point 3: Finalised TWG minutes held on 10 February 2021 to be circulated.**

Action Point 10 (Definition and source of exit payments) - There was a difference of opinion between the HO and NPCC/Staff Associations as to

whether the money for exit payments would come from HMT or from Chief Officers' budgets. However, the proposal from the Government in the Exit Payments Consultation response made clear that pension commutation payments paid to police officers were seen as pension payments. Kevin Courtney (NPCC) clarified that the original question was accurately recorded in the January minutes; there was a proposal to allow greater flexibility to allow officers to take 25% commutation lump sums. The HO/HMT position was that the difference in the lump sums would be paid from the Chief Constable's budget rather than from the pension scheme. The SAB pointed out that this was not an additional benefit and therefore the Chief Constable should not have to make any additional payment to provide it. Instead the funding should be charged to the pension account. The SAB were seeking confirmation on the HO/HMT position.

This point was in relation to a long-standing action where Staff Associations asked for the commutation cap to be removed but HO/HMT had not agreed to this. CPOSA said that if it was a local matter, then it was for the Chiefs to decide. Shabir Hussain (CPOSA) queried the HO's legal basis for insisting it come out of general funds.

HO agreed to look further into this matter and respond to the SAB's question; "Will the HO remove the commutation cap? If not, what is their justification for not doing so?"

Action Point 11 (IB guidance and IHR) - This was in relation to a question around existing Injury Benefit guidance and whether it interacted satisfactorily with the police covenant. Relevant HO colleagues noted that the police covenant would not cover Ill Health Retirement and that the National Reward Team was looking at both Injury Benefits and Ill-health Retirement in a wider context. Alex Duncan (PFEW) noted the lack of consistency in the application of the provisions as being an ongoing problem as had been explained in the paper previously provided to the SAB by PFEW. As this was still outstanding the HO agreed to take this matter away to look at the issues within the existing guidance to ensure consistency.

*5. The Chair went on to discuss the outstanding action points from previous meetings which had been updated in the light of discussions:*

Action Point 9 from 1 July 2020 (Pension sharing orders) and Action Point 11 from 2 April 2020 (Civil partnership guidance) – These actions were on hold at present due to the HO's ongoing focus on the McCloud Sargeant Remedy and other legal cases.

The Chair suggested that any action points on hold would be transferred to a master list. This would allow the Board to keep track of items and enable future prioritisation. **Action Point 4: Secretariat to collate 'on hold' action points into one list for prioritising.**

Action Point 12 from 2 April 2020 (Pensionable pay) – On 8 April, the HO provided a summary policy position on what constitutes pensionable pay in

the pension scheme regulations following Booth v Mid and West Wales Fire Rescue Authority [2019]. PFEW were not content with the response; the SAB had asked for a definition of what constituted pensionable pay and HO responded to say they could not give formal advice or definitive interpretation. Alex Duncan (PFEW) said HO had the responsibility to produce legislation for police schemes and should therefore be able to define what is pensionable pay, and identify the elements of a member's remuneration that count towards their contribution and benefit accrual. Mike Brown (PFEW) noted that being able to identify which parts of a member's remuneration counted as pensionable is a fundamental element within the structure of a pension scheme. and that the answer should therefore be easily identifiable within the governing documentation for the scheme. However, this is not the case for the police schemes. Kevin Courtney (NPCC) pointed out the HO's response refers to pay and not allowances, however London weighting is not pensionable. HO said they would take away comments for further consideration and the action would be recorded as ongoing.

Action Point 2 from 13 January 2020 (Scheme sanction charges) - This was currently with HO lawyers. Due to prioritising work on pensions remedy, there were no recent updates. PSA said it would be ideal if this matter was resolved before pensions remedy as a resolution of this matter had been outstanding for a number of years and it could potentially have an impact.

### **Matters arising**

6. Dan Murphy (PSA) was concerned that Staff Associations had a lack of information on the pensions remedy. He was aware that confidentiality agreements were in place between some members of the Board, to engage with HO and HMT on pensions remedy.
7. Dan highlighted that the purpose and remit of the SAB was to provide advice to the Minister and without all the information, this would be difficult. Dan reminded the meeting that at the February Police Pension SAB Technical Working Group there were discussions about how the SAB and HO would need to work with staff associations to resolve issues. As well as this, the HMT consultation referenced specific consultations and working together. Dan asked if the Minister would be asking the SAB to provide advice on the pension policy issues. He also requested a copy of the confidentiality agreement to be shared. The position was supported by Shabir Hussain (CPOSA) and Alex Duncan (PFEW) who noted that the lack of clarity was in danger of undermining the purpose of the SAB.
8. Dan Murphy raised the matter of the TWG that occurred on the 10<sup>th</sup> February 2021 and the fact that the draft minutes had not been agreed, there was no plan for a further meeting and that the draft minutes contained numerous important concerns for the staff associations that should be recorded as actions and needed to be resolved.
- 9.

10. The Chair agreed to take this matter offline. **Action Point 5: Chair to contact SAB Members to discuss the role of SAB in police pensions remedy work.**
11. Callum Steele (SPF) said it was difficult to overstate the hostility there was from members towards their staff associations on the matter of pensions remedy. Staff Associations do not have the ability to respond due to the lack of information. **Action Point 6: SAB role in police pensions remedy to be a substantive agenda at the next quarterly meeting.**
12. PSA also raised that they had written to HO and have had not received responses including in relation to the 27 policy areas.
13. Alex Duncan (PFEW) understood that members of the Board may have different roles outside of the SAB. The key issue was clarity of what people were doing with their different remits. The purpose of the SAB and whether the Minister intended to seek its advice was also raised.

#### **Matters raised for information (Standing item)**

14. The Government consultation on Regulation 12 of the Police (Injury Benefit) Regulations 2006 was launched on Wednesday 12<sup>th</sup> May. The consultation would be live for eight weeks and a technical working group meeting would be arranged to discuss the SAB's response. **Action Point 7: Secretariat to arrange SAB TWG to draft response to Government Consultations on the Regulation 12 of Police (Injury Benefit) Regulations 2006.**

#### **College of Policing's Police re-joiners guidance for forces**

15. At the PABEW, the CoP had an action to share the updated guidance on re-joiners with members and for any comments to be provided to the NPCC.
16. Shabir Hussain (CPOSA) said there ought to be a summary of the key points for the three schemes whereas the updated version had only few lines in relation to 2015 scheme with no reference to earlier schemes. Shabir had already provided his comments to NPCC. He added that it also needed a section on club transfers and how BTP was excluded
17. Gemma Lofts (PFEW) mentioned the updated guidance referred to expired information such as the Coronavirus Retention Scheme which expired on 1 November 2020. The reading of the document would suggest it still being live. It was also noted that the guidance would need to be updated with effect from next April to take account of remedy.

18. Dan Murphy (PSA) raised an issue concerning transferees from Home Office forces to British Transport Police, in that the implications for their pensions were not clear. He requested clear guidance explaining the consequences. Shabir Hussain (CPOSA) noted that the last agreement between HO, BTP and Railways funds dated from 2013 and covers the respective legacy schemes. He queried whether there were plans for a 2015 scheme successor. Secondly, he said that in view of the proposed McCloud remedy, legacy transferees who move or moved during the remedy period should be able to rely upon the 2013 agreement. (The HO subsequently confirmed that the position for England and Wales is the same). Iain Coltman said the agreement had broken down and so there had been no agreement for the 2015 scheme. From a remedy perspective, he said it would be useful for the HO and Scottish Government to engage with BTP to see what possible arrangement could continue from April 2022.

**Action Point 8: Iain Coltman (Scottish Gov) to engage with BTP and HO, on possible arrangements regarding leavers continuing from April 2022.**

#### **HMT Consultation outcome – NHS Pensions Scheme: increased flexibility**

19. Dan Murphy (PSA) said that since 2017, they had engaged with HO on flexibilities being brought into the 1987 police pension scheme; the double accrual system and the annual allowance which created a disadvantage to those in the 1987 pension scheme. PSA were previously advised that a business case would have to be put forward to HMT to evidence the issues. However Dan Murphy (PSA) said there was not much support from HO on this matter. Dan noted that HMT were engaging with NHS and doctors, and asked whether there would be any similar engagement from HMT for the police pension scheme.

20. From a NPCC perspective, James Hurley was supportive of the position set out by PSA. Shabir Hussain (CPOSA) said the proposed remedies in the NHS consultation had been proposed by the SAB already, in relation to the police pension scheme. Shabir Hussain (CPOSA) said the remedies in the NHS consultation had already been proposed by CPOSA for the 1987 scheme to the SAB which had been rejected by the HO. He reminded the meeting that given there are lawful restrictions on the rights of officers, it was a long held convention that they would be afforded the same new flexibilities within the public sector. He cited the example of senior NHS consultants and the AA tax taper, when the salary threshold was increased, it was increased for the wider public. Dan Murphy raised with the Chair that the SAB had a consensus position on this issue between the staff associations and the employer and they were requesting that the Home Office took action.

21. HO said the pension flexibilities mentioned within the NHS consultation were not adopted. They would take this matter away for further

consideration and check whether the Government had changed its position on the accepted principle; that the police had restricted rights (as they could not withdraw their labour) and therefore should not suffer detriment as a result of this. **Action Point 9: HO to consider pension flexibilities and position on the accepted principle for police pensions schemes.**

## **Pensions Remedy update**

22. In advance of the meeting, a proposed SAB engagement plan (focussing on prospective remedy), a high-level timeline and HMT-produced McCloud Fact Sheet (as at April 2021) by HO were shared with Members.
23. Cat Weston (HO) provided a brief update on pensions remedy work. Since the consultation response publication on 4 February, HO had been working across government on progressing the outstanding policy issues, feeding into HMT's development of the primary legislation, and working closely on scheme specific issues. There was good progress and the Bill for the primary legislation remained on track to be introduced in mid-2021, when parliamentary time allows. Work had begun on the amendments to the scheme regulations required to implement prospective remedy, i.e. all active members accruing service in the 2015 scheme from 1<sup>st</sup> April 2022. Ahead of the formal consultation later in the year, HO would share early drafts of these amendments. Detail on the legislation was set out in the McCloud Fact Sheet.
24. The high-level timeline for legislative remedy, covered both prospective and retrospective remedy. Given the dependency on primary legislation and outstanding technical policy decisions, HO were unable to set out further specifics at this stage but would refine the timeline as it progressed. It was important to note that this was their best assessment at present, but it was open to change. On prospective remedy, HO were currently at the initial stages of drafting work with lawyers. They will engage informally with SAB across late spring/summer, consult formally in the Autumn and lay regulations in the first quarter of 2021, after the Bill receives Royal Assent, ahead of prospective remedy taking effect on 1 April 2022.
25. In parallel to this, there was work on retrospective remedy; HO were working through the remaining technical policy decisions cross government, including working closely with the NPCC representing the Scheme Managers on the scheme-specific complexities. They were expecting to begin drafting after that, with informal engagement across late autumn/winter 2021. The formal consultation would be in late spring / early summer 2022 and thereafter they expected to lay regulations end of 2022. HO were also working with NPCC, administrators and software suppliers on implementation of overall remedy, to ensure the final backstop of 1 October 2023 is met.

Alex Duncan (PFEW) welcomed the proposed engagement plan. He said it would be useful if HO could share composite drafts so that the SAB can provide a meaningful response. PFEW also welcomed clarification on the statement regarding the EIA and asked if there was still an intention to provide a police specific EIA on the proposals, and if not why. Scottish Government were expecting a scheme specific EIA which they would pick up with HO as soon as they received an assessment. **Action Point 10: Iain Coltman to check and distribute draft EIA to SAB.**

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27. A quarterly update on the timeline was welcomed by SAB members as it ensured that they are aware of changes and kept informed of the process, even if formal SAB engagement was not necessary. Dan Murphy raised the fact that all the work described to date had been undertaken without input from the SAB or staff associations. It was also noted that the Matthews case referenced in the material issued by the HO related exclusively to the firefighters and did not have any knock-on implications for the police.

28. Steve Edwards (NARPO) stressed to the HO the importance of prospective claims being considered and their remedy.

29. Dan Murphy (PSA) said it was important for HO to communicate the error of facts within HMT's consultation response formally back to HMT. Issues regarding taxation, late joiners, tapered officers and immediate detriment were also discussed, as was the reference in the McCloud Fact Sheet to primary legislation disapplying consent requirements, which was of concern to the staff associations in relation to the overriding principle of no detriment. After further discussion, it was agreed the Chair would invite HMT to a SAB meeting. As members had several questions around the papers circulated, it was agreed a separate SAB technical work group meeting would be scheduled.

**Action Point 11: Secretariat to arrange SAB TWG for pensions remedy update.**

**Action Point 12: Members to provide Secretariat with main areas of concerns, questions and agenda items for SAB TWG pensions remedy update meeting.**

**Action Point 13: Chair to formally invite HMT to SAB TWG meeting.**

### **Cost Cap Q&A**

30. Rob Fornear (GAD) attended the SAB meeting to answer questions in relation to the cost cap which were submitted by Members in advance.



31. A Police SAB Working Group meeting was held on 24 March to discuss the cost cap results for the police pensions scheme. GAD attended this working group meeting to run through the directions and provisional results for the Police Pension scheme. As it was a Working Group meeting without an independent Chair, the presentation of the results were reverted briefly to the full Police Pension SAB meeting.
32. Dan Murphy (PSA) raised the following on behalf of SANI; "If a member has completed 30 years on the 1988 scheme, which they have now frozen and no longer contribute to, will they be adversely impacted when they retire if they remain in service beyond March 31<sup>st</sup> 2022?" to which GAD replied there was no detriment to officers in the situation in the question.
33. Alex Duncan (PFEW) enquired when the promised report on data and assumptions for the 2016 Valuation would be provided. This is apparently with the HO for final sign off but will be provided soon as will the report on the results of the GAD review of the cost cap mechanism.
34. Shabir Hussain (CPOSA) repeated his previous concern on indexation. The Hutton report confirmed the employers' view that indexation was a cost to be borne by government. Yet he said the treasury direction to GAD requires them to capture CPI and consequently if the 2% ceiling is breached; the remedy -of either increased employee contributions or reduced benefits- results in the members paying for their own indexation. Moreover, the government stated that there would be no 'cherry picking' of the Hutton recommendations. Therefore, he requested an explanation as to why there was now the opposite situation. **Action Point 14: GAD to check point regarding the costs arising from CPI movement.**

### **Reports from Scottish SAB and Northern Ireland's SAB**

35. The Scottish SAB was held in late March which also covered the indicative results on cost cap. The next meeting was scheduled for June to discuss remedy approach, commutation and pensionable pay.
36. Northern Ireland SAB also covered the cost cap result at their recent meeting. In terms of commutation cap (2.25). SABNI have reviewed the policy and have written to their Minister recommending that a similar approach is taken in Northern Ireland.

### **Matters for SAB decision:**

#### **a) Consistency on administration of scheme:**

### **Immediate Detriment guidance/retirement projections**

37. Cat Weston (HO) explained ID was an immediate priority and appreciated Member's views that the guidance should be issued as

soon as possible. HO were currently in the finalisation process working with HMT to get the guidance issued. James Hurley (NPCC) noted that there were no public sector schemes which were applying ID at this time. This was not a police specific issue but a general one. ID was a top priority for the NPCC and they had been engaging with HO and HMT on the guidance.



38. Alex Duncan (PFEW) said they were receiving an increasing volume of queries from officers who have asked their pension administrator for a retirement quote (in respect of a retirement date post 01/04/2022), but the administrators were refusing/unable to provide at this time. By retirement projections PFEW mean 'retirement quotes' that provide officers nearing retirement with an estimate of their pension and lump sum (if applicable) on their nominated retirement date. These are different to an Annual Benefit Statement as they typically provide a breakdown of the options available e.g. maximum pension, or reduced pension and a commuted lump sum. Currently the lack of these meant that officers could not plan properly for their retirement, and are potentially missing out on things like future job opportunities. PFEW sought to understand from the HO its view as to when officers can expect to be able to obtain a retirement quote (where their retirement date is after 1 April 2022), and whether such a view could be communicated to administrators to achieve consistency of approach. PFEW would also then be better informed to manage member's expectations and respond to queries consistently.

## AOB

39. Dan Murphy (PSA) raised the issue of the payment of compensation to officers who incur costs as a result of the implementation of the remedy (e.g. recalculation of annual allowance liabilities). He said he has raised these issues on numerous occasions and many forums, but to date no acknowledgement of the issue or solutions have been offered. Cat Weston (HO) said that this was being looked at.
40. Mike Brown (PFEW) raised the need for the HO to produce and provide a composite version of the 2015 regulations once the remedy changes have been enacted. This would incorporate all of the changes made to the regulations since April 2015 and be updated and reissued following the making of any subsequent changes. Whilst not a legal document, this would provide an invaluable source of reference for all stakeholders saving all of them much time and effort. It would also avoid a repeat of the current unsatisfactory and confusing situation which exists in respect of the 1987 regulations. He noted that the provision of such a document was quite common practice in the private sector. Cat Weston agreed to look into this. **Action Point 15: HO to consider producing composite version of the 2015 regulations once the remedy changes have been enacted.**




## Date of next meeting


41. The next meeting was scheduled on 1 July 2021. The Chair noted that she was keen to return to face to face meetings when possible, but the July meeting will be virtual. Alex Duncan mentioned that hybrid meetings might become a possibility and noted that PFEW had the technology in place to enable this at its HQ in Leatherhead which could potentially be made available.

	<b>Actions</b>	<b>Date of the Meeting</b>	<b>Who/date to be completed by:</b>	<b>Status – to be updated and re-circulated before the next meeting</b>
1	Secretariat to publish finalised minutes of 11 January 2021 on webpage.	12 May 2021	Secretariat	<b>Completed</b>  <u>SAB minutes 11 January</u> ( <a href="http://publishing.service.gov.uk">publishing.service.gov.uk</a> )
2	HO to provide details on HO Comms Package to SAB before it is published.	12 May 2021	Home Office	<b>Completed</b>  On July quarterly meeting agenda.    Police Pension SAB_ DRAFT Police Pension
3	Finalised TWG minutes held on 10 February 2021 to be circulated.	12 May 2021	Secretariat	<b>Completed</b>  Circulated as part of papers for SAB TWG held on 17 June.
4	Secretariat to collate 'on hold' action points into one list for prioritising.	12 May 2021	Secretariat	<b>Completed</b>    UKPPCF & SAB On Hold Action Points.do
5	Chair to contact SAB Members to discuss the role of SAB in police pensions remedy work.	12 May 2021	Chair	<b>Ongoing</b>  This will be a wider piece of work.
6	SAB role in police pensions remedy to be a substantive agenda at the	12 May 2021	Secretariat	<b>Completed</b>  On July quarterly agenda.

	next quarterly meeting.			
7	Secretariat to arrange SAB TWG to draft response to Government Consultations on the Regulation 12 of Police (Injury Benefit) Regulations 2006.	12 May 2021	Secretariat	<b>Completed</b>  Meeting held on 7 June.
8	Iain Coltman (Scottish Gov) to engage with BTP and HO, on possible arrangements regarding leavers continuing from April 2022.	12 May 2021	Iain Coltman (Scottish Gov)	<b>Ongoing</b>  SG and HO) have begun engagement with British Transport Police Authority and their advisers, with a meeting to set out a framework for discussion due in the coming weeks. GAD will support those discussions.
9	HO to consider pension flexibilities and position on the accepted principle for police pensions schemes.	12 May 2021	Home Office	<b>Ongoing</b>
10	Iain Coltman to check and distribute draft EIA to SAB.	12 May 2021	Iain Coltman (Scottish Gov)	<b>Ongoing</b>  The scheme specific EqlA remains in draft and will be worked up following review of the Pensions Remedy Bill Clauses, supporting documents and Impact assessment due in July.

11	Secretariat to arrange SAB TWG for pensions remedy update.	12 May 2021	Secretariat	<b>Completed</b> Held on 17 June.
12	Members to provide Secretariat with main areas of concerns, questions and agenda items for SAB TWG pensions remedy update meeting.	12 May 2021		<b>Completed</b> Covered in SAB TWG held on 17 June.
13	Chair to formally invite HMT to SAB TWG meeting.	12 May 2021	Chair	<b>Completed</b> HMT responded on 15 June. They were unable to attend and reassured "HMT officials are working closely with their Home Office counterparts on the development and implementation of the McCloud pensions remedy."
14	GAD to check point regarding the costs arising from CPI movement.	12 May 2021	GAD	<b>Ongoing</b>
15	HO to consider producing composite version of the 2015 regulations once the remedy changes have been enacted.	12 May 2021	Home Office	<b>Ongoing</b>
<b>OUTSTANDING FROM PREVIOUS MEETING</b>				
10	Frances Clark (HO) to report back to SAB on the definition and	11 January 2021	Frances Clark, Home Office	<b>Ongoing</b> The HO circulated a response to the SAB via email outlining

	therefore the source of exit payments.			<p>their position on exit payments however the SAB clarified the request at the quarterly meeting - "Will the HO remove the commutation cap? If not, what is their justification for not doing so?"</p> <p> Police Pension SAB action_ Exit Payments</p> <p> Police Pension SAB Action_ Exit Payments</p> <p> RE_ Police Pension SAB Action_ Exit Payrr</p>
11	Frances Clark (HO) to look at the issues within the existing guidance for improvements, (in respect of IB awards and IHR) and to ensure consistency of administration of Injury on Duty and Ill Health Retirement.	11 January 2021	Frances Clark, Home Office	<b>Ongoing</b>
12	Home Office to take matters regarding clarity of what constitutes as pensionable pay in the pension scheme	02 April 2020	Home Office	<p><b>Ongoing</b></p> <p>The HO provided a summary on 8 April about policy position of what constitutes as pensionable pay in</p>

	regulations to lawyers.			<p>the pension scheme regulations following Booth v Mid and West Wales Fire Rescue Authority [2019].</p>  <p>Police Pensions SAB_ HO action re police pe</p> <p>Members were not content with the response therefore HO agreed to consider comments further.</p>
2	Home Office to provide guidance on scheme sanction charges to secretariat and Chair.	13 January 2020	Home Office	<p><b>Ongoing</b></p> <p>This was currently with HO lawyers.</p>
6	Home Office to look at previous advice provided on re-joiners with HMT.	13 January 2020	Home Office	<p><b>Ongoing</b></p> <p>HO provided an update on 12 March. This issue has been delayed due to cross-cutting issues with the more detailed policy development on Remedy. HO are working to resolve this as soon as possible.</p> <p>The focus should be on new wording rather than the current position.</p>