

Sent by email to

Gareth Cooper
Deputy Director, HMRC Public Service Pensions Remedy
gareth.cooper@hmrc.gov.uk

08 January 2025

Dear Mr Cooper,

Re: Self-assessment for 2023/2024 Pension Savings Statements

We write jointly to you on behalf of the National Police Chiefs' Council and National Fire Chiefs' Council in response to the [HMRC FAQ document](#) to highlight the effect of the requirement to complete self-assessment in respect of pensions tax by 31st January 2025 where there are delays in issuing pension savings statements for 2023/2024. .

The police and fire pension schemes are locally administered schemes: each police force or fire and rescue service is independently responsible as the Scheme Manager for establishing administration arrangements, whether in house, provided by e.g. a local authority (LGPS) administrator or outsourced to a commercial provider. Across police and fire scheme manager arrangements there are over 20 different administrators appointed across the 43 Police forces and 44 Fire and Rescue services using three different software systems. This makes co-ordination of administration resource across forces more complex and difficult than in larger, centrally administered, integrated schemes.

Therefore, while recognising that delivery of remedy is a complex project, Scheme Managers seek always to minimise the complexity of administration and processing and at the same time secure clarity of intent to ensure consistency of application with no ambiguity or scope for varying interpretation. This may not be such an important requirement for centrally administered, integrated schemes, but is necessary for locally administered schemes.

We therefore write to you to highlight the significant difficulties for our most senior ranking police officers and firefighters with regards to complying with the requirement by HMRC to deal with self-assessment by 31 January 2025 where someone has not received a pension savings statement for 2023/2024.

- We note that the only reason for a delay in producing PSS to enable Self-Assessment by 31 January 2025 occurs due to delays in producing remediable (R)-PSS for remedy for the tax years 2015/2016 through to 2022/2023.
- As a result, this has the effect that if someone has not received an R-PSS for remedy then in essence the member has not received a correct PSS for 10 years.

- If the administrator cannot produce a PSS due to remedy, then it stands to reason they cannot provide information to support an 'estimate'.
- If the member has not received an accurate PSS for 10 years due to remedy and the administrator cannot give information to support an estimate, then on what basis does HMRC expect a member to make their estimate? Especially as the link given within the recently provided FAQ document does not, as stated, provide guidance about how to estimate a provisional tax charge.
- The guidance suggests that interest may be charged if the provisional estimate is lower than the actual figure once generated, therefore this may generate estimates being higher than they need to be in the absence of any supporting information for making those estimates.
- Due to the increase in annual allowance limits to £60,000 this issue will affect some of our most senior ranking chief officers. These public figures will want to ensure tax returns can stand up to audit and transparency and making a return that is an 'estimate' will most likely generate a need to pay for that estimate to be calculated on behalf of the chief officer.

We would instead ask for consideration that, as these issues are entirely linked to the implementation of the age discrimination remedy, pensions savings statements for 2023/2024 for individuals eligible for remedy should be brought into 'the relevant tax years' under the Tax Administration Framework (TAF) set out in [Part 6 of the Tax \(No 2\) regulations](#).

Yours sincerely,



Gavin Stephens QPM & Mark Hardingham CBE QFSM

Chair of NPCC & Chair of NFCC

Copies to

Paul Kirk, Head of Public Service Pensions, HMT

Peter Spreadbury, Home Office

Julia Mulligan, Police pension scheme advisory board chair

Joanne Livingstone, Firefighters pension scheme advisory board chair