HYMANS ROBERTSON

Current issues

March 2022

Articles this month:

Dashing ahead with dashboards

The Department for Work and Pensions (DWP) has begun a consultation exercise on '*indicative*' Pensions Dashboards Regulations 2022, detailing the obligations of occupational pension scheme trustees and dashboard providers.[1] It proposes to introduce the obligation to connect with, and supply data to, the dashboards system in stages, starting in the summer of 2023 with schemes with at least 20,000 active and deferred members. The consultation period ends on 13 March 2022.

Scope

Based on the draft Regulations, the requirements would eventually apply to all UK occupational pension schemes that have at least 100 active and deferred members and are '*registrable*' (that is, covered by the register of occupational and personal pension schemes maintained by the Pensions Regulator). Public service pension schemes would be captured even if they are not registrable.

In its current form, the draft provisions would—

- prescribe the conditions that must be satisfied by a '*qualifying pensions dashboard service*' (QPDS)—an electronic communications service, run by an FCA-authorized provider, by means of which scheme members will be able to request and obtain information about their private and State pension benefits;
- require occupational pension scheme trustees or managers to register with the Money and Pensions Service (MaPS), connect to its dashboards infrastructure, and provide data to QPDSs;
- contain a '*staging profile*' establishing the deadlines by which occupational pension schemes must register and connect to the dashboards system; and
- allow the Pensions Regulator to take action to enforce compliance.

[1] <www.gov.uk/government/consultations/pensions-dashboards-consultation-on-the-draft-pensions-dashboards-regulations-2022>. .

Staged application of responsibilities

The staging profile contained in the indicative Regulations covers 'large' (1,000-or-more member) and 'medium' (100-to-999 member) schemes, and runs from 30 June 2023 to 31 October 2025. Defined contribution (DC) master trusts with 20,000 or more members (only actives and deferreds are counted for these purposes) would have to connect to the dashboards system by 30 June 2023, closely followed by DC auto-enrolment schemes with at least 20,000 members, for which the deadline would be 31 July 2023. The staging profile would then encapsulate smaller and smaller DC schemes as the months pass. Private sector defined benefit (DB) schemes with 20,000 or more members would reach their staging deadline on 30 November 2023. Public service pension schemes of all sizes would have to join by 30 April 2024.

The Regulations do not apply to schemes with 99 or fewer members, but the DWP's consultation document says that staging of this group is likely to begin in 2026.

Trustee obligations

Very simply described, the operation of the dashboards system, from the scheme perspective, will revolve around 'find' and 'view' requests. In response to a find request initiated by a dashboard user, trustees (or more likely their administrator or other service provider) will have to interrogate their scheme's records to see if they can identify a match with the personal data supplied by the user. This '*find data*' will include '*verified identity attributes*' checked by the MaPS—name, home address and date of birth—and '*self-asserted data*', such as the person's phone number, email address and National Insurance number. The trustees will have to decide the criteria to be used for matching (the Pensions Administration Standards Association has produced guidance that is likely to become a benchmark for the industry[2]).

When a match is made, trustees would need to confirm via MaPS that the member has consented to having their data provided to a dashboard service. If so, the trustees would have to provide '*view data*' to the dashboard that issued the view request. View data comprises—

- '*administrative data*'—scheme name, benefit type, membership status, date of joining, normal pension age, contact details for the scheme administrator, and (if available) details of the member's pensionable employment(s);
- '*signpost data*'—the website address for any information that trustees must disclose publicly online (details of costs and charges, the statement of investment principles, and the associated implementation statement); and
- '*value data*'—current and projected benefits.

In response to a view request, administrative and signpost data would have to be provided immediately, except when sought by a new member who is within three months of joining the scheme, in which case the administrative data must be provided within three months of the joining date. There would also be associated record-keeping and reporting obligations.

Value data

There are detailed requirements for value data, which are different depending on the type of benefit. All value data for the member must have a single illustration date, and must be from either a statement that was given during the preceding twelve months or a calculation performed within the same period. It must be accompanied by '*contextual information*' such as the illustration date; whether the values are expressed as regular income, lump sums or pot values; whether there are associated dependants' benefits; and whether the benefits would increase in payment.

Value data taken from a past statement or calculation must be given immediately. If, instead, the calculations are performed ad hoc in response to the view request, the trustees have ten working days in which to respond if theirs is a non-money purchase scheme, and three working days otherwise (we are not sure that the drafting gives effect to the policy intention). The DWP says that it is '*keen for these proposed timings to be reduced' and intends 'to move towards instantaneous responses for all requests* [involving money purchase schemes] *in the future.*'

Guidance

The draft Regulations also make provision for mandatory standards set by the MaPS, on data usage, design, reporting, and technical matters, plus a guide to a 'code of connection' that will cover security, service and operational issues. The Pensions Dashboards Programme (PDP), convened by MaPS, has published some guidance on the proposed scope of

[2] <www.pensionsdashboardsprogramme.org.uk/2022/01/31/dwp-consultation-regulations-pensions-dashboards-pdp-standards>.

those standards, how it will go about setting them, and what they might contain.[3] It has also issued invitations for a series of consultation-related webinars to be hosted by the DWP.

As well as re-uniting people with lost pensions, the dashboards will help to equip savers with the information that they need to plan for the best possible retirement. The 28 pages of draft legislation and 137-page consultation document will leave no-one in any doubt about the complexity of this important undertaking. We anticipate that it will take some time to work the kinks out of the proposals, with staging dates in the summer of 2023 already looming large.

CDC Code of Practice published for consultation

The Pensions Regulator has published a consultation-draft Code of Practice on '*authorization and supervision of collective defined contribution schemes*'.[4]

Background

The legislation allowing for the establishment of collective defined contribution (CDC) schemes—the legally approved phrase is 'collective money purchase' (CMP)—is contained in the Pension Schemes Act 2021. Whilst it has not yet been brought fully into force, draft Occupational Pension Schemes (Collective Money Purchase Schemes) Regulations 2022 have been laid before Parliament, and are set to commence on 1 August 2022.[5]

Collective DC schemes are seen as a way of providing members with better outcomes than are available from traditional money purchase schemes. They do so by pooling risks during the pre- and post-retirement stages. As with an ordinary money purchase scheme, the employer has certainty over its contributions, so CDC provision is less risky for sponsors than are defined benefit (DB) schemes. The CDC scheme aims to provide its members with a certain level of pension, but they have no legal entitlement to particular rates or amounts of benefits. Instead of making the sponsor liable for the balance of the cost of financing DB, members' pensions are subject to periodic actuarial adjustment to maintain a balance with the available assets.

Authorization & supervision

The draft Code contains guidance on how to apply for authorisation of a CDC scheme, and the criteria that the Regulator will use when considering those applications. The authorisation criteria relate to:

- fitness and propriety;
- systems and processes;
- member communications;
- continuity strategy;
- financial sustainability; and
- sound scheme design.

The Code also sets out details of the ongoing supervision regime for authorized schemes, and the actions trustees need to take if a 'triggering event' occurs. Triggering events include things like loss of authorization and sponsor insolvency. On the occurrence of a triggering event, the CDC scheme trustees must follow pursue one of the available 'continuity options', which vary depending on the nature of the event but generally involve discharging the scheme's liabilities and winding it up, resolving the issue in question, or closing the scheme to new contributions or members (or both). The Regulator intends to revisit the Code later in the year to expand on its expectations for the continuity options, and will be publishing regulatory guidance.

The deadline for consultation response is 22 March 2022.

The first CDC scheme to apply for authorization is very likely to be for Royal Mail employees. The draft Code makes it clear that the standards of governance expected and the level of supervisory scrutiny to which schemes will be subjected are likely to be exacting.

---

[3] <www.gov.uk/government/consultations/pensions-dashboards-consultation-on-the-draft-pensions-dashboards-regulations-2022>.
[4] <www.thepensionsregulator.gov.uk/en/document-library/consultations/collective-defined-contribution-code-consultation>.
[5] See 'CMP draft legislation consultation response', in *Current Issues* January 2022, <www.hymans.co.uk/insights/research-and-publications/publication/current-issues-january-2022/>.

Revisionist history: 'scheme pays' when the facts change

Her Majesty's Revenue and Customs (HMRC) has published draft legislation about the information to be provided in connection with new rules that will allow members to instruct their scheme administrators to pay annual allowance charges arising from changes to historical pension input amounts.[6]

The changes to the 'mandatory scheme pays' conditions are being made in conjunction with the implementation of the Government's solution to the '*McCloud*' problem in the public sector pension schemes. The issue there is with transitional arrangements made when the schemes switched from final salary to career-average revalued earnings (CARE) benefit provision in 2015 (or 2014, in the case of the Local Government Pension Scheme for England and Wales). In the *McCloud* judgment, the Court of Appeal found that those arrangements, which protected those closest to retirement, gave rise to unlawful, direct, age-based (and also indirect sex- and race-based) discrimination. The solution is in essence to provide all members in scope (regardless of age) with either final salary or CARE benefits for the period up to 1 April 2022, depending upon which option is most advantageous in their own circumstances. In some cases, that will mean that 'pension input amounts' (PIAs) for past tax years are revised, and some of those members will, consequently, incur annual allowance charges. To help them manage such charges, there are provisions in the current Finance Bill that would allow members to give 'scheme pays' notices following revision of historical PIAs. In broad terms, a 'scheme pays' notice obliges the scheme administrator to pay the annual allowance charge on the member's behalf, and to reduce his or her benefits proportionately.

In summary, HMRC's draft *Registered Pension Schemes (Miscellaneous Amendments) Regulations 2022* would require employers and others who are responsible for supplying scheme administrators with the information necessary for the calculation of pension input amounts to issue corrections within three months of becoming aware of changes to those details (or, if later, by 6 July following the end of the relevant tax year). Scheme administrators would have three months (or until 6 October following the end of the relevant tax year, if later) in which to provide members with revised 'pension savings statements', or rectify other information supplied with respect to members' annual allowance positions, following receipt of additional data. The scheme administrator would then have another three months in which to deliver the related event report to HMRC.

Comments about the draft Regulations should be submitted by 15 March 2022.

Although the changes to the 'scheme pays' rules are being driven by events in the public sector, the scope of the amendments will not be confined to public service pension schemes

Auditing pension figures—sponsor accounts

The ICAEW's Audit and Assurance Faculty has produced a guide, *Auditing Pension Figures – Sponsor accounts*, that explains the roles of the parties involved in preparing disclosures of UK based funded defined benefit schemes. It is useful both for auditors and for those looking to understand good practice in managing auditor requests. This note summarises the content of the guide.

Relationships and independence

Auditors will need to interact with a number of different parties in addition to the entity's management. The various parties and relationships between them include:

- The pension scheme: noting that the pension scheme is a separate legal entity to the sponsor entity
- Management / sponsor: providing an 'employer covenant' to the pension scheme, representing its willingness and financial ability to meet its legal obligation to support the pension scheme going forwards
- Trustees: responsible for running the pension scheme solely in the interest of participants and beneficiaries, ensuring it is run properly and benefits are secure
- Scheme Actuary: provides the trustees with necessary valuations and advice, completing triennial valuations with a requirement to be prudent
- Management Actuary: appointed by management to advise on assumptions and assist in preparing figures for the financial statements relating to the pension scheme

[6] The draft <www.gov.uk/government/consultations/draft-legislation-the-registered-pension-schemes-miscellaneous-amendments-regulations-2022>.

Whilst the auditor is engaged by the sponsor entity, other third parties have a contractual relationship only with the pension scheme trustees who are independent of that entity. They are not under the same obligation as the sponsor (or its directors) to provide information to the auditor unless explicitly allowed by their contracts. Permissions and authority should be put in place in good time to enable transfer of information between parties that may be relevant to audit work.

Auditor requests

The auditor needs to obtain adequate audit evidence on which to base their opinion, particularly given the complexities around the auditing of assets and liabilities of a DB pension scheme. Information received directly from third parties represents stronger audit evidence than information received from the sponsor entity. Good communication is vital to avoid superfluous or irrelevant information requests that could lead to inefficiency and unnecessary costs. In situations where the auditor is unable to access the information they require there may be a limitation on the scope of the audit and the auditor might need to modify their audit opinion.

The following are areas where the auditor will look to gather audit evidence.

Objectivity

The auditor will need to assess and conclude on the sponsor actuary's competence and objectivity. This may include any professional qualifications such as being a fellow of the Institute and Faculty of Actuaries.

Assumptions

The key to the audit work will be the auditor's consideration of whether the assumptions underlying the actuarial valuation are appropriate. The sponsor may use its own judgment to apply a different assumption to that proposed by its actuary. The auditor will need to understand the judgment applied in selecting these assumptions. The auditor will consider if the assumptions appear reasonable given their knowledge of the sponsor and the scheme, which may need specialist technical knowledge from a specialist or expert. The auditor will also consider the sensitivity of the calculations to changes in the actuarial assumptions and assess whether any discrepancies identified may have a material impact on the scheme's surplus or deficit.

Source data

The auditor will need to consider whether the source data provided to management's actuary is materially accurate and complete. This might include reconciling data such as the number of employees and pensioner members, as supplied by the sponsor to its actuary, to the scheme records requested from the trustees via the sponsor, or verification of current employee payroll data and the contributions paid over to the scheme, on a sample basis.

GDPR should be a consideration, particularly for any detailed requests that involve membership data. Planning should be done early to avoid confidentiality issues and ensure the appropriate permissions are in place.

Auditing the roll forward

The auditor and its expert will need to consider, from discussion with the preparing actuary, if the roll forward estimate is reasonable. This might require details such as how the roll-forward was performed, what assumptions were made, including on the demographics of scheme participants, and what adjustments were made. It should be noted that the actuary's estimation will likely be less accurate in the second and third years following the triennial valuation, as greater estimation uncertainty is involved.

Asset side testing

The auditor will try to gain an understanding of the existence and types of investments held, along with the risks associated with particular investments. The approach to auditing pension scheme assets could involve:

- A controls based approach: drawing on information such as control reports from investment managers to get comfort around asset valuations provided
- Substantive approach: if no such reports are available a substantive approach is likely to be required where more in depth testing of asset information is required.

Scheme and corporate internal controls

If the administration of the scheme is carried out by a service organisation, the auditor can obtain an AAF Assurance report on internal controls, which may help reduce the need for the auditor to directly audit controls of the trustees' service organisations. Although controls reports may be available for certain outsourced service providers acting on the trustees' instructions, they may not be available for other advisors. There may be other quality assurance processes in place that the auditor will need to assess.

Completeness and accuracy of pension disclosures
The auditor will request that draft and final FRS 102 / IAS 19 reports are provided directly to them. The auditor or their expert will also review the final report to ensure it is consistent with the assumptions and other information that will have been discussed with the sponsor and the sponsor's actuary. The auditor will discuss any errors or discrepancies with the management and their actuary in order to receive explanations or to adjust figures.

Special events
In the event of any particular special events affecting the scheme in any given year, auditors may need to request additional, specific supporting information in order for them or their expert to understand the impact of complex changes. These changes might include changes to the scheme benefits or employer restructuring, among other events.

Auditing defined benefit pension schemes can be complex. The ICAEW's guide is helpful in ensuring auditors can identify the key parties involved when auditing corporate accounting disclosures where the entity sponsors a defined benefit pension scheme. It is important to recognise that information may be needed from a number of sources and some of the information may not be immediately available. Early engagement and arranging for the correct permissions to be in place can help with timely delivery of information. The guide states that increasing the understanding of audit teams will, it is hoped, lead to smoother and robust processes at year end.

Regulator gives practical example of climate-change compliance

The Pensions Regulator has supplemented its climate-change governance guidance with a lengthy account of the practical steps that trustees might take to meet their obligations.[7] The additional material documents the activities of a fictional trustee board, from introductory training through to publication of their climate-change report.

The statutory climate-risk governance obligations began to apply to the largest schemes (those with at least £5 billion in assets) from 1 October 2021. They will encapsulate schemes with assets of £1 billion or more with effect from 1 October 2022.

The example has been included as an appendix to Governance and reporting of climate-related risks and opportunities, which the Regulator issued on 16 December 2021.[8] It is meant to be a companion to the Department for Work and Pensions' statutory publication, Governance and Reporting of Climate-change Risk: Guidance for Trustees of Occupational Schemes, which came into force alongside the relevant legislative provisions, on 1 October 2021.[9]

[7] Step-by-step Example of Following the Climate-change Guidance, <www.thepensionsregulator.gov.uk/en/document-library/scheme-management-detailed-guidance/funding-and-investment-detailed-guidance/climate-related-governance-and-reporting/appendix-a-step-by-step-example>.
[8] <www.thepensionsregulator.gov.uk/en/document-library/scheme-management-detailed-guidance/funding-and-investment-detailed-guidance/climate-related-governance-and-reporting>.
[9] <assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1006024/statutory-guidance-final-revised.pdf>.

Auto-enrolment: earnings band and trigger 2022/23

The Department for Work and Pensions (DWP) has published analysis of the automatic enrolment earnings band and trigger, in support of its decision to retain the current, 2021/22 figures for 2022/23.[10] Subject to Parliamentary approval of the secondary legislation, the qualifying earnings band would continue to extend from £6,240 to £50,270 (despite an increase in the National Insurance lower earnings limit, from £6,240 to £6,396), and the trigger would be held (again) at £10,000.

The Government has decided to freeze the lower end of the qualifying earnings band at its 2021/22 level *'to ensure that the policy does not move further away from the proposal to abolish* [the limit], *as outlined in the 2017 Review of Automatic Enrolment.'*

We welcome the additional 17,000 people (by DWP's reckoning) who will be brought into the scope of auto-enrolment by the decision to keep the earnings trigger at £10,000

Choice legislative tidbits

Expansion of collective defined contribution (CDC)

In the course of discussing draft legislation designed to enable the first, single-employer (or single-employer-group) CDC schemes, the Pensions Minister (Guy Opperman) announced that the Government '*will move to multi-employer CDCs in the latter part of this year, going into next year*'.[11]

Conditions for transfer

Responding to criticism raised by the Joint Committee on Statutory Instruments about new constraints placed around the statutory right to transfer in November 2021, the Department for Work and Pensions (DWP) confirmed '*that it is not the intention… to capture, as a scam-risk indicator within the amber flag created, circumstances where there is in fact low risk of a scam.*'[12] The comment referred to the 'amber flag' ostensibly raised when the scheme that would receive the transfer has or will make '*any overseas investments*'—a condition that stands to affect a great many schemes of good pedigree. The Committee reported that the DWP '*has been made aware of a potential issue of too many pension transfers being caught by the amber flag*', and '*is actively engaging with industry representatives to reach an understanding of the potential issue and the distinction between those overseas investments that present scam risk and those that do not*.' If it agrees that there is a problem, the DWP '*will consider amending the Regulations*'.

Duelling Private Members' Bills

Guy Opperman once again voiced his support for the *Pension Schemes (Conversion of Guaranteed Minimum Pensions) Bill*, a Private Member's Bill sponsored by Margaret Ferrier MP, during its Third Reading in the House of Commons.[13] He speculated that the Bill, which would rectify some well-known problems with the drafting of the GMP-conversion legislation, '*will only just get under the line*', referring to the end of the current Parliamentary session. He did not, however, have the same optimism for Richard Holden MP's Pensions (Extension of Automatic Enrolment) Bill, which seeks to reduce the age of auto-enrolment to 18 and to remove the lower limit of the qualifying earnings band (so that contributions are due 'from pound one'). The Pensions Minister said, '*The reality is that there is no real way for* [the] *Bill to get through this House and the House of Lords in the time allowed*' (but see the next paragraph for more promising news on the subject).

Auto-enrolment scope extension

The amendments to the automatic enrolment rules sought by Richard Holden are in accordance with Government policy, announced back in 2017, but were postponed until sometime in the mid-2020s. In the course of a debate in the House of Commons in late January 2022, Guy Opperman announced that the DWP is '*looking to bid for a third or fourth Session pensions Bill that can take* [the reforms] *forward as normal Government business*.'[14]

---

[10] <www.gov.uk/government/publications/automatic-enrolment-review-of-the-earnings-trigger-and-qualifying-earnings-band-for-202223>.
[11] <hansard.parliament.uk/commons/2022-02-21/debates/5925fab5-614d-4f22-b651-ac0c993ea69a/DraftOccupationalPensionSchemes%28CollectiveMoneyPurchaseSchemes%29Regulations2022>.
[12] <publications.parliament.uk/pa/jt5802/jtselect/jtstatin/151/report.html>.
[13] <hansard.parliament.uk/commons/2022-02-25/debates/52A3D985-D7D7-48E6-87F4-15F5F1958C6E/PensionSchemes%28ConversionOfGuaranteedMinimumPensions%29Bill#contribution-E4201B91-1AB3-4EA7-9701-8DCFB0254250>.
[14] <hansard.parliament.uk/Commons/2022-01-26/debates/64096644-3E43-4DDF-8FF4-66FE85C52C87/AutomaticPensionEnrolment#contribution-6CCD09A6-4AD5-4C93-8B94-C731F2A89F44>.

Fixed-rate GMP revaluation for post-5.4.22 leavers

Regulations laid before Parliament in February 2022 confirm that the fixed rate of revaluation of guaranteed minimum pension (GMP) will be 3.25 per cent per annum for those whose pensionable service ends on or after 6 April 2022.

By default, GMP is revalued in deferment in accordance with 'section 148 Orders', which aim to maintain the value of benefits relative to average earnings (s. 148 Orders also apply during active service, GMP being a career-average revalued earnings benefit). Schemes may instead provide for deferred revaluation in accordance with the appropriate fixed percentage, the rate of which is determined by the date on which the member leaves pensionable (or, once upon a time, contracted-out) service. The revaluation rate is reviewed every five years ('quinquennially', as we were wont to say in days of yore when governmental language was more grandiloquent).

The fixed rate of revaluation for those whose pensionable service terminates between 6 April 2017 and 5 April 2022 is 3.5 per cent. In September 2021, following advice from the Government Actuary's Department, the Department for Work and Pensions proposed to reduce the fixed rate to 3.25 per cent for those leaving service during the period from 6 April 2022 to 5 April 2027.[15] The *Occupational Pension Schemes (Schemes that were Contracted-out) (No. 2) (Amendment) Regulations 2022*, were laid before Parliament on 21 February 2022, thereby putting that proposal into practice.[16]

[15] Guaranteed Minimum Pension Fixed Rate Revaluation <www.gov.uk/government/consultations/guaranteed-minimum-pension-fixed-rate-revaluation>.
[16] SI 2022 No. 158.

HMRC newsletters, February 2022

Pension Schemes Newsletter 137[17] from Her Majesty's Revenue and Customs (HMRC) includes the following:

- the administrators of public-sector pension schemes are urged to contact members who are at risk of regaining, and almost immediately losing, lifetime allowance protections when the Government implements its solution to the unlawfully discriminatory transitional provisions that accompanied the reforms made in the midst of the previous decade;
- the ability to migrate schemes from Pension Schemes Online (HMRC's outgoing, internet-based tax-administration system) to the Managing Pension Schemes Service (PSO's replacement) will be available from 11 April 2022;
- the migration from PSO to MPSS will be of pressing concern for those who need to meet the 15 May deadline for the Accounting for Tax return for the first quarter of 2022, because from 14 March 2022 it will no longer be possible to submit returns for any quarter from 1 April 2020 onward via PSO;
- from 11 April 2022, it will be possible to bulk upload data from a spreadsheet when compiling an AFT return using the MPSS;
- it will no longer be possible, from 14 March 2022, to submit AFT returns using third-party software; and,
- from 14 March 2022, for '*a short period of time*', administrators will be unable to pay tax charges connected with AFT returns using their Pension Scheme Tax Reference numbers—it will be necessary to quote the relevant '*charge reference*' (which may be obtained by emailing pensions.administration@hmrc.gov.uk and including '*Accounting for Tax – charge reference*' in the subject line).

[17] <www.gov.uk/government/publications/pension-schemes-newsletter-137-february-2022/pension-schemes-newsletter-137-february-2022>.

And Finally…

An article elsewhere in this edition mentions Pensions Minister Guy Opperman's rumination on the possible timing of relaxations to the restrictions under which collective money purchase schemes will operate. The coda to his comment was, '*We… will move at a sufficient pace that we feel is appropriate*', which we bring up only because we interpreted it as the more-polite, Parliamentarian equivalent of saying, 'We're not going to be rushed into things by the likes of you', and found that somewhat amusing.

The Pensions Guy also said, more perplexingly, that he was '*often criticized on the one hand for not bringing this forward quickly enough and on the other for going too slowly.*' Hmmm… Now, we should note here that *Hansard* occasionally contains transcription errors, or fails to convey irony effectively. It's possible that Opperman was shooting for something along the lines of a wry, 'I'm damned if I do, and damned if I don't' quip. However, on its face the remark suggests that he might have misplaced part of an upper limb recently. It's not inconceivable: steeplechasing can be a dangerous pastime…[18]

[18] Opperman is an ex-professional jockey. Or a professional ex-jockey.