

Response ID ANON-5QE2-MGX7-Z

Submitted to 'McCloud' remedy in the LGPS – supplementary issues and scheme regulations

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Your details

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Scope of the consultation

Introduction

Proposals

Question 1 – Do you agree with the rules about aggregation and underpin protection that we are proposing?

Agree with reservations

Please explain your answer further if needed.:

WYPF are pleased with the change of approach for members with previous unaggregated membership in the LGPS, however we are concerned that we may not hold or the member may not provide details of all previous LGPS membership. It would therefore be useful to receive guidance on how much effort is required by administering authorities to obtain details of previous LGPS membership.

Club transfers into the LGPS

Question 2 – Do you agree with our proposed approach regarding Club transfers?

Agree with reservations

Please explain your answer further if needed.:

WYPF agrees with the proposed approach regarding Club transfers, but we have similar concerns as for unaggregated LGPS membership, in that it may be difficult to obtain details of previous Club membership from members and verified by the former Club scheme.

Flexible retirement

Question 3 – Do you agree with our proposal to extend underpin protection to the period after flexible retirement, if it is in the underpin period?

Agree

Please explain your answer further if needed.:

Question 4 – Do you agree with our proposal for multiple final underpin dates if a member takes 'partial' flexible retirement?

Agree with reservations

Please explain your answer further if needed.:

For consistency, WYPF agrees with the proposal for multiple final underpin dates where a member takes 'partial' flexible retirement. However, we note 'partial' flexible retirement is already extremely complicated and this will add an extra layer of complexity for software suppliers and administering authorities.

Divorce

Question 5 – Do you agree with our proposed method for calculating a CEV for a member with underpin protection?

Agree

Please explain your answer further if needed.:

Question 6 – Do you agree with our proposal to remove pension debits from the calculation of the provisional assumed benefits and underpin amount?

Agree

Please explain your answer further if needed.:

Excess teacher service

Question 7 – Do you have any comments on the approach being adopted for these members?

Yes

Please explain your answer further if needed.:

WYPF feels the approach being adopted for these members is sensible, but as already highlighted will be very complex to administer without detailed guidance.

Question 8 – Are there any areas where specific scheme regulations regarding excess teacher service would be necessary or beneficial?

No

Please explain your answer further if needed.:

WYPF feel that amendments to the LGPS Regulations should be kept to a minimum, but these should be supported by detailed guidance on all aspects outlined in the consultation document.

Compensation

Question 9 – Do you have any comments on the Government's approach to compensation?

Yes

Please explain your answer further if needed.:

WYPF are happy with the government's approach to compensation and at first glance we feel that in the LGPS there would only be a small number of cases where it may apply and therefore the proposed guidance would be really useful.

Interest

Question 10 – Do you have any comments on the Government's approach to interest?

Yes

Please explain your answer further if needed.:

WYPF feel the government's approach to interest is rather complex and therefore it could be difficult for software providers to update their systems in a timely manner

Injury allowances

Question 11 – Do you agree with the approach we have proposed for injury allowance payments?

No comment

Please explain your answer further if needed.:

Equalities

Question 12 - Do you have any comments on our equality impact assessment?

Yes

Please explain your answer further if needed.:

WYPF are happy with the data used in the equality impact assessment, given you have considered all the data sets readily available.

Question 13 – Are you aware of additional data sets that would help us assess the impacts of the LGPS McCloud remedy on the LGPS membership?

No

Please explain your answer further if needed.:

Draft regulations

Question 14 – Do you have any comments on the draft regulations?

Yes

Please explain your answer further if needed.:

On an initial review of the draft Regulations, they appear to cover what is necessary and intended, however the true test will come when administering authorities start applying these on actual cases.

Question 15 – Do you have any other comments you would like to make on McCloud remedy in the LGPS?

No

Please explain your answer further if needed.:

About this consultation

Personal data