

Access & Fairness LGPS Consultation response template.

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Consultation opens 15th May and closes 7th August 2025.

Kent Pension Fund Response

About You	Q1. What is your name?	Gareth Wookey Technical and Compliance Lead Manager Kent Pension Fund
	Q2. What is your email address or telephone number?	Gareth.wookey@kent.gov.uk 03000 415561
	Q3. Are you responding to this consultation as an individual or submitting a collective response from a group?	This response has been collated on a group basis.
	(Q3.1 - If responding on behalf of a group) What is the name of the group or organisation you are submitting a response for?	This group response is on behalf of Kent Pension Fund.
	(Q3.2 - If submitting a collective response) Please provide a summary of the people or organisations you represent and who else you have consulted to reach your responding conclusions.	Kent Pension Fund is the administering authority for the LGPS in the county of Kent. This collective response has been collated from the views of the senior management and technical teams who work in the administration team at Kent Pension Fund.
	Q4. Type of respondent?	Administering authority
	Q5. What is the first part of your postcode?	ME14

Subject	Subheading	Question	Response
Chapter 1 – Survivor Pensions and Death Grants	Survivor benefits (Pension entitlement equalisation)	Q1 – Do you agree with the government’s proposed amendment of survivor benefits rules?	<p>We support the proposal to amend the survivor benefit rules to equalise entitlement across the different categories of survivors.</p> <p>We are disappointed that it has taken so long to address the Goodwin case, as this will have a significant impact on the process to rectify any historic cases, from the perspective that more cases will have been processed in the intervening time since the Goodwin judgement.</p>
		Q2 – Do you have any comments on the intended approach to equalising survivor benefits?	<p>Given that there would be an expectation that certain benefits will require backdating to 2005, it would be useful if the Government could address the logistic difficulties that administrators will face in trying to trace eligible survivors, where no payment was originally made, or how payments are to be dealt with where a relevant survivor has died and there is an amount of backdated pension owing.</p> <p>We would also like to raise a technical question around female members of the LGPS who paid additional contributions to increase the value of their survivor benefits. Is there any intention to address these scheme members who will now technically be worse off, having paid additional contributions for a benefit that is now being offered to all members.</p>
		Q3 – Do you have any comments on the administrative impact, particularly in identifying cases where calculations of past benefits would need to be revisited?	<p>We have significant concerns over the effectiveness of backdating of benefits where no benefit was originally awarded. Due to how records were kept, it will be very difficult to automate any exercise to contact newly eligible survivors who were not due an award at the point the scheme member died. This will have to be a manual process. It would be useful if the Government could give some guidance or deadlines by which any survivor would have to come forward to make such a claim.</p> <p>If a survivor member has died before the recalculation of benefits is done, how will this be paid, as there will be no payroll record for the individual and the member’s estate is likely to have been wound up.</p> <p>It could also be the case that any backdated survivor pension that becomes due could be very small. This could create a heavy administrative burden for very little outcome. As well as causing a burden on administrators, it could also be upsetting for relatives to revisit the passing of a loved one, particularly if further paperwork is required to make the award which could be difficult to locate after so many years.</p>

			<p>Alternatively, if a backdating created a large amount of arrears of pension this could cause issues for any other benefits an individual was receiving should their income be changed as a result of the recalculation of benefits.</p> <p>Intertwined with any backdating of survivor benefits will be the need for administrators to also continue with the McCloud rectification work. Experience of this project has taught us that software updates can lag behind legislative changes, and this can then create delays in implementing changes. It would be favourable for the Government to recognise the extent of the practical challenges of implementing these changes before setting punitive timescales on administrators.</p>
		Q4 – Do you have any further comments on the proposed changes?	In addition to question (2) above, we would like to question whether there needs to be additional guidance around GMPs for male survivors, i.e. where a female member of the scheme was contracted out of SERPS between 06/04/78 and 05/04/97, and subsequently dies; will there be any guidance issued on how to deal with the GMP entitlement for a surviving male?
	Survivor benefits (Cohabitee survivor pensions)	Q5 – Do you agree with the government's proposals to formalise the removal of the nomination requirement?	We are in agreement with this proposal.
		Q6 - Do you have any comments on the government's proposals to formalise the removal of the nomination requirement?	We have no comments on this.
		Q7 – Do you have any comments on the proposed approach to backdating?	<p>As an administering authority we have followed previous guidance from the LGA to disapply the nomination requirement.</p> <p>However, for any authority who have not done so, we would have concerns over the backdating element of the proposal, given that paperwork dating back years would need to be produced to evidence co-habitation. We feel it will be difficult for some members to produce such documents from such a long time ago, especially if they have changed providers (mortgage / utility / local authority) in that time.</p>
	Death grants (age 75 cap)	Q8 – Do you agree with the proposed amendments to death grants?	We are in agreement with this proposal.
		Q9 - Do you have any comments on the government's proposals to remove the age 75 cut-off from the LGPS Regulations?	Our thoughts on this are included in the answers to Q10 and Q11.

		<p>Q10 – Do you have any comments on the proposed approach to backdating?</p>	<p>We feel that the exercise to backdate death grants will be even more difficult than that for survivor pensions covered above. This is because where a survivor benefit is not in payment, it will be very difficult to locate or contact the legal personal representative or any next of kin.</p> <p>While we will have access to scheme member records to potentially identify members eligible for backdating, the actual process will require a huge amount of manual investigation and correspondence to locate a recipient for any backdated death grant. As some of these cases could take longer than two years to resolve, it is likely some of the issues below, covered in our answers to Q12 and Q13, would become relevant to these backdated awards.</p> <p>There could be a significant cost to pension funds to implement this backdating. This will be difficult to establish as significant investigative work will need to be done to find cases. If this increases the cost of the scheme, we are wary of whether this increased cost could be passed on to scheme members, which could then increase opt out rates.</p> <p>If there is a requirement to backdate, we do not understand why this is not being done to 2011. If we have to backdate, we do not want a future challenge to occur that causes us to revisit this in future; we would rather get any backdating right first time and not have another appeal case cause us to revisit this issue in future years.</p>
		<p>Q11 – Do you have any comments on the administrative impact, particularly in identifying historic cases where death grants that were not paid would now be paid?</p>	<p>We would question how any discretion for payment should be exercised if we were required to pay a death grant in relation to a historic case. A deceased scheme member's circumstances may be extremely difficult to establish some years after death; relationships may have changed or other suitable individuals may have died in the intervening time. We feel that there would need to be some guidance on the level of required investigations into recipients, especially in consideration of recent determinations by the Pensions Ombudsman.</p>
	Death grants (personal representatives)	<p>Q12 – Do you agree with the proposal to remove the two-year limit?</p>	<p>In general, we do not experience a high number of death grants paid outside of the two year limit. It would therefore not be an area we view as a high priority or one that creates significant inequality.</p> <p>We would also be conscious of the proposed changes to inheritance tax, and the fact that there may be further changes to the payment of death grants in coming years. Making this change now could therefore create an additional administrative burden that is only relevant for a short time.</p>

		<p>Q13 – Do you have any comments on the government’s proposal to remove the two-year limit?</p>	<p>We do not agree with some of the terminology used in the consultation document. In point 42, it should be stated that the death grant is paid at the absolute discretion of the administering authority. This discretion is not something that can be pre-determined and every case requires investigation; this has recently been clarified in a number of determinations by the Pensions Ombudsman. On this basis all death grant casework can take significant amounts of time to ensure the discretion for payment is implemented properly.</p> <p>We would be curious as to the Government’s view on death grants that have already been taxed at 45%, or which are nearing the two-year limit. Will there be any revisiting of past cases? In addition, if an authority has a case that has exceeded the two year limit but has not yet been paid, would any new rules be applied to that late payment? This may need to be considered as it could have a significant impact on the tax payable.</p> <p>Where payment of a death grant is made into a child’s trust fund or to a charitable organisation, how would the tax be applied in these cases?</p> <p>If a death grant is counted as income for tax purposes, could we face a position where an identified recipient of a death grant declines payment due to it affecting their personal tax position, for example pushing them into a higher tax bracket?</p> <p>We feel that more technical detail is needed re our points raised above for us to properly comment on the feasibility of this change.</p>
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Chapter 2 – Gender Pension Gap	Authorised absences under 31 days	<p>Q14 – Do you agree that the LGPS Regulations should be updated so that any unpaid leave under 31 days is pensionable as a way to address the gender pension gap?</p>	<p>We agree that it would be administratively simpler for these periods to be automatically pensionable. We are not sure that this will significantly address the gender pension gap.</p>
		<p>Q15 – Do you agree the government should use the actual lost pay option when calculating contributions, or do you think APP should be the chosen option? Please explain the reasons for your view.</p>	<p>We feel this is really a question for scheme employers, as they will be required to undertake the calculations.</p> <p>Our opinion on this would be that actual pay is a more logical method for employers to use and perhaps easier for a scheme member to understand. In using actual pay though, there would be a disparity between lost pension</p>

			calculations and other calculations that use APP, e.g. ill health calculations. Having two different methods running at the same time could be confusing for employers and require additional software updates. This may need to be considered before any decision is made.
Cost of buying back pension lost in an unpaid break of over 30 days	Q16 – Do you agree with the proposal to align the cost of buying back unpaid leave over 30 days with standard member contribution rates?	We agree this would reduce the cost of buying back lost pension and so create a fairer scheme, although it would increase the cost of the scheme for employers. We wouldn't want this increased cost to be passed onto scheme members in other ways.	
	Q17 – Do you agree with the proposal to change the time-limit for buying back unpaid leave pension absences from 30 days to 1 year?	<p>We agree that this is a positive change, as it will enable the scheme member to have more time to make a decision on buying back unpaid leave.</p> <p>However, we would feedback that our scheme employers create problems in not communicating options to members in a timely fashion. We would hope extending this time limit would alleviate some of these issues, however the general complexity of buying back lost pension needs to be addressed to for the benefits of this amendment to be realised.</p> <p>We would question the fact this is only being applied to 'active' members, and therefore penalising members who have unpaid leave but who then leave employment. We feel this option should also apply to members who leave the scheme at the end of their unpaid leave.</p> <p>Furthermore, there is already scope for an employer to allow longer periods to repay a lost pension APC. In legislating for a longer period, it could increase administration issues, e.g. if a member leaves within 12 months of the end of a period of unpaid leave there could be issues awarding a final benefit until their decision on repaying lost pension is known.</p>	
	Q18 – Do you agree with removing the three year limit on employer contributions in Regulation 15(6)?	<p>We do not see the three year limit as a major issue that requires rectifying, and do not see that it is a significant factor in fuelling inequality. Increasing the limit could have cost implications for employers who have already authorised breaks of more than 5 years.</p> <p>There could also be annual allowance implications if members started buying back significant periods of lost pension.</p> <p>There is also a limit on the total additional pension that a scheme member can purchase in the LGPS. If the three year limit on buying back lost pension is extended, we feel the limit on the additional pension a member can purchase will also need to be reviewed and possibly increased.</p>	

	Pension contributions during child-related leave	Q19 – Do you agree with updating the definition of child-related leave to include all periods of additional maternity, adoption and shared parental leave without pay?	We agree that this update would simplify things, however we think consideration needs to be given to how it is introduced e.g. for members on maternity leave at the point it changes.
	Making gender pension gap reporting mandatory	Q20 – Do you agree that gender pension gap reporting should be mandatory in the LGPS?	<p>We would like to have more clarity on what the data would be used for, before commenting on whether reporting should be mandatory. We are not clear on how this would be fed back to employers or what changes may then be made to the scheme using this data.</p> <p>We would also refer to our answers to questions 25 and 26; in mandating reporting, we believe this should fall on employers rather than administering authorities.</p>
		Q21 – Do you agree that the 2025 valuation (and associated fund annual reports) is preferable?	We feel that this is a challenging deadline given the pressures of the 2025 valuation and other on-going work. However, we would prefer this to be reported triennially rather than annually as it will reduce the administrative burden on reporting.
		Q22 – Do you agree with the threshold of 100 employees for defining which employers must report on their gender pension gap?	<p>With regard to ‘an employer’, we feel that clarification is needed on this. For instance, within the education sector, the multi-trust academy model is widely used with our authority. It would need to be very clear as to who the employer was in these cases.</p> <p>In addition, setting a limit of 100 ‘employees’ may not make the statistics representative of the scheme. For the example of a small school, the majority of employees may not be eligible for the LGPS. We believe the threshold should recognise the number of members eligible for the LGPS within the employer. To report on an employer with a small (eligible) LGPS membership would create a set of data that is possibly skewed by one or two high or low earners.</p>
		Q23 – Do you agree with the gender pension gap definition being ‘the percentage difference in the pension income for men and women over a typical working life’?	<p>Using the definition of working life seems to offer too much of a long term view and too difficult to measure in a scheme as big as the LGPS where scheme members frequently move between employers and administering authorities.</p> <p>In addition, we do not think that it is as clear cut as men vs. women in the case of reporting gender pay gaps.</p>

			<p>The rationale for this would be thus; comparing a female who is employed as the chief executive at a local authority with a male who is employed as a cleaning operative at that same employer will skew the results of any analysis.</p> <p>We feel that more detailed analysis is required to get a true reflection on the gender pension gap, for instance focusing on groups of staff based on their job role. In our opinion, the purpose of the pension gender gap analysis should be addressing scheme members on a like for like basis; i.e. comparing a female chief executive with a male chief executive. The pensions gender gap is not about pay or job role, but primarily about why two individuals in two similar job roles have a disparity in their pension build up. We feel the reporting described in the consultation will not necessarily draw out the right data for the pensions gender gap to be addressed.</p>
		Q24 – Do you agree with the gender pension savings gap being ‘the percentage difference in the pension savings accrued over one year for men and women’?	We feel this is preferable to the proposal in question 23.

Chapter 3 – Opt-outs	Publication of opt-out data in the Annual Report	<p>Q25 – Do you agree that the annual report is the best method of reporting data on those who choose to opt-out of the scheme?</p>	<p>We do not agree that the fund annual report is the best place to report this data. The reporting of opt outs in the fund annual report may reflect negatively on the fund and affect confidence of existing members of the scheme. We do not understand what value is added by reporting opt outs to anyone other than central Government.</p> <p>There is also a time lag in collating the annual report, so this may affect the validity of the data by the time it is reviewed.</p> <p>We feel that the reporting line should go from the employer directly to central Government rather than involving the administering authority. A scheme employer has a vested interest in the scheme working as a retention tool, and so it would make more sense for the scheme employer to hold responsibility for managing opt out rates.</p>
		<p>Q26 – Do you foresee any issues with administering authorities’ ability to gather data on opt-outs?</p>	<p>This would require the co-operation of scheme employers. In our fund, we have over 400 active employers, so there will be many thousands of employers across the country who would need to participate to enable worthwhile data to be collected. We feel there needs to be legislation aimed at employers to implement this, e.g. alongside auto-enrolment legislation. There also needs to be a consequence to not providing this data that administering authorities can use, e.g. fines.</p> <p>We also see issues collating and holding data for individuals who are not members of the pension scheme. Our administration systems are set up to hold data for scheme members, not members who have opted out and who have no entitlement to benefits. We appreciate that legislation may enable us to collect this data under GDPR, however there would be software amendments required to hold and report this data and this would come at a cost to pension funds.</p>
		<p>Q27 – When updating the annual report guidance to reflect opt-out data collection, what information would be most useful to include?</p>	<p>We feel that it is most important to focus on employees who are eligible for the LGPS with an employer. The employer will therefore need to specifically hold a database for their total workforce with pension scheme eligibility defined against each specific post. We feel this needs to be done a post or ‘job level’ as so many employees hold multiple posts, and so could be an active member of the LGPS in one post but not in another.</p> <p>It would also be useful to determine if the employee is opting out of the LGPS following automatic re-enrolment. This could help to identify serial optants out from</p>

			other members who are opting out at other times, for example shortly after starting employment / close to retirement / following a period of unpaid leave etc.
	Collection of additional opt-out data	Q28 – Do you agree with the proposal to collect additional data about those opting out of the scheme?	<p>We feel that usefulness of data will be compromised if only some members complete it. Most people who want to opt out want minimal administration so are probably even less likely to fill out any additional forms.</p> <p>Also, some members tend to be angry they have been put in in the first place so any survey of members may get aggressive responses. Responses will also peak around auto-enrolment dates, so repeat optants out will have to fill out forms periodically. Repeat optants out may need to be accounted for within statistics, particularly where a large employer moves past a re-enrolment date and experiences a high level of opt outs.</p>
		Q29 – Are you an employer, part of an administering authority or member of a pensions board?	We are an administering authority.
		Q30 – Do you have any comments on the collection of additional information?	<p>We do not feel it appropriate to collect or retain data where an employee opts out of the pension scheme within 3 months of joining. This is because, the member is treated as never having been a member of the scheme and contributions are returned through the employer's payroll. We therefore feel that we should not be retaining this information under GDPR.</p> <p>In general, recording of members who have opted out will increase the administrative burden on the scheme. All members would be required to hold a record on our database, which would need to be managed. There will also have to be updates to our software to report on this data, and this will come at a financial cost to the scheme.</p> <p>We feel that members who have opted out have often done this due to the cost of living and their salary not being of a level to enable pension saving. These aspects are outside the control of the scheme, so we are uncertain as to what collection of this data will achieve. Also, some members chose to leave the scheme as they want more control over the investment of their pension fund, so chose to set up a personal pension arrangement; we have seen more examples of members opting out and transferring to such schemes in recent years.</p> <p>In regard to point 86. of the consultation document, clearly it would only be possible for a scheme employer to provide information on the number of employees who have opted out and the number of employees who are eligible for the LGPS. In the instance of a member who opts out in 2025/26, would they</p>

			<p>continue to be counted as an opt out member in 2026/27 and ongoing or is it just in the year of opting out that they are included in the statistic? If they are to be counted every year as an opted out member, this would become a significant data exercise that would require a detailed annual return from each employer.</p> <p>In general, we feel that the LGPS offering is significantly better than other pension provision in the private sector. We would rather the Government focus on improving pension provision across the board and improving the knowledge and understanding of pensions within the general population.</p>
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Chapter 4 – Forfeiture	Removing the requirement that a member must have left employment because of the offence	Q31 – Do you agree that the government should amend regulations 91 and 93 of the 2013 Regulations to remove the requirement that the member must have left employment because of the offence in order for an LGPS employer to be able to make an application for a forfeiture certificate or to recover against a monetary obligation?	<p>We believe that this change could be construed as carrying an element of age discrimination. Point 94 of the consultation documents states that it will not apply to benefits already paid. A scheme member who leaves aged 55 or over can resign, on a voluntary basis, and take their pension without employers consent knowing that their crime may be discovered in the future and the employer can do nothing to recover loses. Members under age 55 will potentially have their pension withheld or reduced. What is the position where the process has been started but no forfeiture certificate has been issued - are administering authorities to withhold payments / transfers etc whilst the process is ongoing?</p> <p>To add further complications, there is the need to have a conviction, which could take years to be in place.</p> <p>We would feedback that such cases are very infrequent and would prefer consideration to be given to finding alternative routes via the courts.</p>
	Removing the time limit to make a forfeiture application	Q32 – Do you agree that the three month time limit for an LGPS employer to make an application for a forfeiture certificate should be removed?	We have no issue with removing this limit to align the LGPS with other Public Sector Pension Schemes.
	Revoking regulation 92	Q33 – Do you agree that Regulation 92 of the 2013 Regulations should be revoked?	We have no experience of this particular regulation, however we are of the opinion that any simplification of the regulations is beneficial for the administrative burden of the scheme.
	Forfeiture in relation to benefits accrued in earlier schemes	Q34 – Do you agree that in order to give full effect to the proposed amendments equivalent modifications should apply to earlier schemes?	We agree that an amendments should apply to earlier schemes.
	Forfeiture guidance	Q35 – Do you agree that there should be forfeiture guidance to assist employers in making applications?	We agree that detailed guidance in this area is necessary, especially as forfeiture is applied so infrequently.

Chapter 5 – McCloud Remedy	Divorce credits	Q36 – Do you agree with the government’s proposal for pension debits and credits?	As an administering authority, we would prefer a pragmatic solution. The implementation of the McCloud remedy has been extremely complicated, and
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			<p>difficult to implement, particularly as software has struggled to keep up to date with the changes which has resulted in time consuming manual calculations.</p> <p>We are unsure of that the proposal will not create significant further amounts of work for administrators for relatively little outcome.</p>
	Deaths on 30 September 2023	Q37 – Do you agree with the government’s proposal to cover deaths on 30 September 2023?	We agree with this.
	Interest on Club transfers	Q38 – Do you agree with the government’s proposal to clarify if interest applies on Club Transfers?	We agree with this.
	Part 4 tax losses	Q39 – Do you agree with the government’s proposal to include part 4 tax losses in the 2023 regulations?	We agree with this.
	Transfers from other public service schemes for members over 65 years old	Q40 – Do you agree with the government’s proposal for transfers from other public service schemes for members over 65 years old?	We agree with this.

Chapter 6 – Other Regulation Changes	Amendments from the Joint Committee for Statutory Instruments	Q41 – Do you agree with the proposal to omit Regulation 50 and the equivalents to it (to the extent that they have been preserved) in the 1997 and 2008 Regulations?	We agree with this.
		Q42 – Do you agree with the proposal to withdraw the actuarial guidance linked to Regulation 50?	We agree with this.
		Q43 – Do you agree with the proposal to amend the definition of BCE in the 2013 Regulations?	We agree with this.
		Q44 – Do you agree with the proposed approach to PCELSs?	We agree with this.
		Q45 – Do you agree with the proposed approach to issue updated actuarial guidance on the treatment of PCELSs?	We would like to point out that we feel more guidance is needed around eligibility for PCELSs, primarily around how to calculate post 1997 contracted out rights for the purposes of establishing available pension for conversion to a PCELS. The current guidance on PCELSs in the LGPS is lacking detail to help us deal with real life cases.

		Q46 – Do you agree with the proposed amendments to the Regulations?	We specifically do not agree with the amendments to regulation 17(10) and Regulation 19(1), the reasons of which are set out in our answer to Q47.
		Q47 – Do you have any comments on the proposals in this chapter?	<p>Re. points 135 to 137: We feel that the proposed change to Regulation 17(10) is a backward step. This creates an orphan AVC fund, which was always an issue prior to 2014. These orphan AVC funds create an administrative burden on the scheme administrator, particularly when contact is lost with the scheme member and the AVC fund is small. The member may also not fully understand the implications of not transferring their AVCs at the same time as their main scheme benefits i.e. loss of options to use that AVC fund. We would rather this amendment not proceed, and there remain a requirement to transfer AVCs alongside main scheme benefits. We would also question why this approach is being taken in light of the Government's position on small pots; reintroducing orphan AVCs will increase small pots in the LGPS.</p> <p>Re. points 151 to 152: We do not feel this addresses the issues we experience as administrators with the 5-year refund rule.</p> <p>There are significant issues where a scheme member leaves and is awarded a deferred refund, and does not claim that refund within the 5 years. If they then subsequently rejoin the LGPS, their only option is to a refund, however as they have rejoined the scheme they cannot then take a refund without extinguishing their rights in the scheme. If the Government's intention is to enable individuals to save for their retirement, why put a deadline on enabling a deferred LGPS member to aggregate a deferred refund. Upon leaving employment, a deferred refund member may not know when or if they might re-enter an LGPS eligible employment, so cannot plan when to take a refund of contributions. This whole position is out of line with the position on small pots; surely we should be enabling the aggregation of small pots whereas the current and proposed regulations make this not possible if the member holds a deferred refund for more than 5 years.</p> <p>We also feel there is a discrepancy with deferred refund scheme members who ceased membership before 1 April 2014. In these cases, members may be able to aggregate membership; this puts these members in an advantageous position, which could result in future discrimination challenges.</p> <p>We feel that the statement made at 152(d) is unworkable and ambiguous. In some cases refundable contributions can be extremely small, and the administrative</p>

			<p>burden of trying to return these contributions far outweighs the amount that is paid. If the Government has a desire for individuals with deferred refunds to retain their benefits within a registered pension scheme, we would like to see deferred refund entitlements added to the Pension Dashboard to assist with the task of staying in contact with scheme members.</p>
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Chapter 7 – Administrative impact of proposals	Administrative impact of proposals	<p>Q48 – Do you have any comments about the impact the combined proposals in this document will have on administration?</p>	<p>We would like to feedback that there is a huge amount of change in pensions at the moment, both across the industry and within the LGPS.</p> <p>With so many competing demands on time and resources, administrators are being stretched as we are asked implement changes and ultimately do more to run the pension scheme. It is increasingly difficult to train our staff on changes, and to communicate these effectively to scheme members.</p> <p>Our software providers are also struggling to contend with such frequent and detailed changes, which often leaves us as an administrator having to undertake manual calculations which are time consuming and carry a higher level of risk, given they are performed outside of any system software.</p> <p>It is frustrating that some of these changes could have been implemented some years ago, which would have spread the burden of implementation, rather than building so many changes into a single consultation. With other high level projects on-going such as McCloud, Dashboards, Abolition of the LTA and NMPA changes, further implementation work is unhelpful.</p> <p>We would like the Government to acknowledge this in any future implementation programme and embed an element of pragmatism within any future implementation deadlines.</p>
		<p>Q49 – Are there any areas where you believe the proposals are significantly more complex and would benefit from a later implementation date?</p>	<p>We believe that reporting requirements on opt outs and gender pension gap could be delayed without significant detriment to any stakeholder.</p>

		<p>Q50 – Do you have any comments on the proposed approach to cost?</p>	<p>Any changes will result in increased costs to administrators as work will need to be undertaken to update software and internal processes, staff and employer training will be needed and member communications undertaken.</p> <p>Again, within the wider context of current LGPS and pension industry changes, it is disappointing that the issue of scheme costs is not deemed worthy of further consideration. It should be noted that it is not just direct financial costs that are relevant; there are other costs associated with making the LGPS ever more complicated such as staff turnover, member satisfaction and the ability of administrators to accurately administer the scheme in a timely fashion.</p>
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Chapter 8 – Public Sector Equality Duty	Other regulation changes	Q51 – Do you consider that there are any particular groups with protected characteristics who would either benefit or be disadvantaged by any of the proposals? If so, please provide relevant data or evidence.	We have no comments to make on this area.
		Q52 – Do you agree to be contacted regarding your response if further engagement is needed?	We are happy to be contacted if needed.