

Local Government Pensions Committee  
Secretary, Lorraine Bennett

## LGPC Bulletin 184 – April 2019

### Foreword

This bulletin contains a number of important updates for LGPS administering authorities, scheme employers and software providers; whilst also providing a general update for all stakeholders.

Of particular importance are the articles on:

- [The CARE Scheme in England and Wales – 5 year anniversary](#)
- [Exit payments cap consultation launched](#)
- [Pensions administration software framework to go ahead](#)

all of which require the attention of certain stakeholders.

If you have any comments on the contents of this bulletin or wish to suggest items that might be included in future bulletins, please contact [query.lgps@local.gov.uk](mailto:query.lgps@local.gov.uk).

### Contents

#### **LGPS Scheme Advisory Board (SAB) England & Wales**

[SAB update](#)

#### **LGPS England & Wales**

[SCAPE discount rate – impact on actuarial guidance – update](#)

[Fair deal consultation](#)

[Discretionary policies](#)

[CARE Scheme – Five year anniversary](#)

[Codes for calculators updated](#)

#### **LGPS Scotland**

[SCAPE discount rate – impact on actuarial guidance – update](#)

#### **HMT**

[Exit payments cap consultation](#)

#### **HMRC**

[Pension schemes newsletter 108](#)

#### **DWP**

[Pension Dashboards](#)

[Changes to benefits paid to mixed age couples](#)

#### **TPO**

[PO-19673 Estate of the late Mrs N v Derbyshire County Council](#)

[Recoupment in overpayment cases factsheet published](#)

#### **TPR**

[TPR publish regulatory intervention report on Oxfordshire Pension Fund](#)

## [Other news and updates](#)

[The Civil Partnerships, Marriages and Deaths \(Registration Etc.\) Act 2019](#)  
[Timeline regulations updated](#)  
[Tell Us Once notifications](#)  
[Communications working group minutes published](#)  
[The Finance \(No.2\) Act 2017](#)  
[Updates to guides and factsheets](#)  
[Money and Pensions Service Business Plan and listening events](#)  
[Pension administration software framework to go ahead](#)  
[Technical queries](#)

## [Training](#)

[Circular 313 issued – Fundamentals Training](#)  
[Annual Governance conference](#)

## [Wider landscape](#)

[DWP publish guidance on GMP equalisation](#)  
[State pension guidance updated](#)

## [Legislation](#)

## [Useful links](#)

## [LGPS pensions section contact details](#)

## **LGPS Scheme Advisory Board (SAB) England & Wales**

### **SAB update**

The SAB met on 8 April 2019. An update of the matters covered at the meeting can be found on the [Board updates](#) page of [www.lgpsboard.org](http://www.lgpsboard.org), where you can also find a link to updates published previously. Topics and issues discussed at the April meeting include:

- **Good governance project**  
Hymans Robertson updated the Board on progress and next steps
- **Cost cap**  
Despite the 'pause' in the cost management process announced by the Government on 30 January 2019, advisory boards of other public sector schemes have made requests to their relevant ministers to continue the cost management process; the possibility of the SAB taking a similar approach was discussed
- **Responsible investment guidance**  
The Board agreed that the guidance should be web-based to allow for updates and the inclusion of links to related information
- **2019/20 Budget and workplan** agreed and sent to MHCLG Ministers for consideration and approval.

## LGPS England & Wales

### SCAPE discount rate – impact on actuarial guidance – update

On 29 March 2019 Lorraine Bennett emailed administering authorities to let them know that a revised version of the factor spreadsheet had been issued by MHCLG. The updated version includes the new club and CRA factors which took effect from 1 April 2019.

On 23 April 2019 Rachel Abbey emailed administering authorities to confirm that the Lifetime Allowance factors had been cleared for use by MHCLG and have effect from 1 April 2019.

The factor spreadsheet, transitional table and covering letter concerning the implementation of the Lifetime allowance factors can be found on the [actuarial guidance page](#) of [www.lgpsregs.org](http://www.lgpsregs.org).

### Fair deal consultation

The MHCLG consultation on '[Fair deal – strengthening pension protection](#)' in the LGPS closed on 4 April 2019. You can view the consultation documents and the response submitted by the LGPC on the [Scheme consultations](#) page of [www.lgpsregs.org](http://www.lgpsregs.org).

### Discretionary policies

On 8 April 2019 Jayne Wiberg contacted administering authorities to inform them that revised versions of the Discretionary policy list and summary (versions 1.8 and 1.10 respectively) have been published. Clean and tracked changes versions can be found on the [Guides and sample documents](#) page of [www.lgpsregs.org](http://www.lgpsregs.org).

The latest change removes the discretion relating to opted out members accessing their pension benefits under regulation 31(7A) of the LGPS regulations 1997. Such a member is prevented from accessing their pension before they have left employment by virtue of regulation 93(1).

### CARE Scheme – Five year anniversary

The CARE Scheme has now been operational in England and Wales for five years. This means that April 2019 is the first month that certain member 'events' will occur.

#### 1. Post 2014 Deferred Refund, member left more than five years ago

As reported in [bulletin 183](#), the National Technical Group has contacted the SAB to request a change in the LGPS Regulations 2013 to remove the requirement for a refund to be paid within five years. Unless and until such a change is made, the rules apply as they stand. The [minutes](#) of the Technical Group meeting held on 28 September 2018 set out the approach agreed by the group and these are summarised in the table overleaf:

Re-joined the LGPS?	Deferred Refund	Other information
No	Paid to member after more than five years – interest only up to five years after leaving	Report to Local Pension Board, pensions committee and include in the breaches register.  The refund would be an unauthorised payment if the member is over age 75 and would have to be included in the Event report and tax charges* would be due.
Yes – less than five years after leaving	Deferred refund <b>must</b> be combined with active pension account	
Yes – more than five years after leaving	Paid to member after more than five years – interest only up to five years after leaving.  Note – deferred refund <b>cannot</b> be combined with active pension account	Report to Local Pension Board, pensions committee and include in the breaches register.  The refund would be an unauthorised payment which must be included in the Event report and tax charges* would be due.
Unknown or not able to make payment in one of the categories above	Refund not paid	Report unpaid refund to Local Pension Board, pensions committee and include in the breaches register.  Administering authorities may instead discharge liability by paying the refund to an ESCROW account before the expiry of five years.

\* The refund payment may be subject to an Unauthorised Payments Charge (member – 40%), Unauthorised Payments Surcharge (member – 15%) and Scheme Sanction Charge (administering authority – 40%)

## 2. Post 2014 Deferred member re-joins LGPS after more than five years

A deferred Scheme member with post 2014 benefits only (or only membership treated as post 2014 membership) re-joins the Scheme after a gap of more than five years.

Aggregation is automatic unless the member elects within 12 months of re-joining (or such a longer period as the employer allows) to retain separate benefits.

CARE account from deferred membership is transferred to active pension account, but **in-scheme revaluation does not apply** for the period the member was deferred, instead increases due under the Pension Increase (Review) Orders apply.

### **3. Deferred member with pre and post 2014 membership re-joins after more than five years**

Aggregation is automatic unless the member elects within 12 months of re-joining (or such a longer period as the employer allows) to retain separate benefits.

CARE account from deferred membership is transferred to active pension account, but **in-scheme revaluation does not apply** for the period the member was deferred, instead increases due under the Pension Increase (Review) Orders apply.

Transfer value of final salary benefits used to purchase CARE benefits in the active pension account.

These will be the first cases in which a member's final salary benefits could be converted to CARE pension **without** a positive election from the Scheme member. It is important that administering authorities review their documentation to ensure that the member's options and the default position if no response is received are clear.

#### **Action for administering authorities**

Make sure processes are in place to transfer a CARE pot where the gap is greater than five years, and that in-scheme revaluation does not apply for the period of deferment.

Review documentation sent to re-joining members and update if necessary to cover cases where the gap between leaving and re-joining exceeds five years.

You may need to check with your software supplier:

- How to record CARE benefits aggregated to a new pension account after a gap of more than five years to ensure that the correct revaluation is applied
- That transfer out documentation (when processing a transfer to another LGPS administering authority in England or Wales) includes the information the receiving administering authority will need to calculate a transfer in correctly where the member had benefits pre and post 2014 and the gap exceeds five years.

### Codes for calculators updated

The calculators available on [www.lgpsmember.org](http://www.lgpsmember.org) have been updated to reflect the new limits for the 2019/20 year, and where appropriate, the new methodology and factors. The following calculators have been updated and the code is available for use by administering authorities in England and Wales on the [Code for calculators](#) page of [www.lgpsregs.org](http://www.lgpsregs.org):

- APC calculator
- Annual allowance quick check tool
- Contributions calculator
- Lifetime allowance quick check tool
- Lump sum calculator

### LGPS Scotland

#### SCAPE discount rate – impact on actuarial guidance – update

On 18 April 2019 Roddy MacLeod (SPPA) contacted Scottish administering authorities to let them know that GAD have issued guidance covering the Application of a Pension Credit to the former spouse or civil partner of a post 2015 member. The guidance has been added to the [actuarial guidance](#) page of [www.scotlgpsregs.org](http://www.scotlgpsregs.org).

In the same email sent on 18 April 2019 it was confirmed that SPPA are awaiting responses to a number of queries concerning the presentation of the factor spreadsheet and the implementation dates of new factors which have been referred to GAD.

### HMT

#### Exit payments cap consultation

On 10 April 2019 Lorraine Bennett contacted administering authorities to inform them that HM Treasury have launched a consultation called '[Restricting exit payments in the public sector: consultation on implementation of the regulations](#)'. The LGA will be submitting a response before the 12-week consultation closes on 3 July 2019.

The LGPC have produced a briefing note which ties together the contents of the consultation documents. The briefing note and the consultation documents can be found:

- on the [non-scheme consultations](#) page of [www.lgpsregs.org](http://www.lgpsregs.org) where you will also find a one page summary aimed at local government employers in England and Wales
- on the [non-scheme consultations](#) page of [www.scotlgpsregs.org](http://www.scotlgpsregs.org)

HMT welcomes responses to the consultation from employers, employees and their representatives, HR, payroll and pension experts, and anyone else who might be impacted by the proposals.

Introducing a cap on exit payments will have significant implications for employers as well as for administering authorities. We encourage administering authorities to share information about the consultation with their Scheme employers to ensure that they have an opportunity to respond.

## HMRC

### Pension schemes newsletter 108

On 29 March 2019, HMRC published [pension schemes newsletter 108](#) which includes articles on:

- GMP – a working group is being set up to consider the pension tax issues arising as a result of GMP equalisation
- Master Trust update – the authorisation application window closed on 31 March 2019
- Managing Pension Schemes service
  - If you have registered as a scheme administrator on the Pension Schemes Online service you can find out [how to register](#) for the Managing Pension Schemes service
  - How to add another scheme administrator to your scheme
  - Saving a draft version of a report before submitting it
  - How to find a charge reference for an accounting for tax (AFT) return
- Annual allowance calculator – updated to include the 2019/20 year

## DWP

### Pension Dashboards

As reported in [bulletin 179](#), the DWP consultation on the introduction of pension dashboards closed on 28 January 2019. The government published its response to the consultation on 4 April 2019. You can find the consultation documents, the LGA response and the government response to the consultation on:

- The [non-scheme consultations](#) page of [www.lgpsregs.org](http://www.lgpsregs.org)
- The [non-scheme consultations](#) page of [www.scotlgpsregs.org](http://www.scotlgpsregs.org)

Key details of the government's plans include:

- Legislation to compel pension providers to make consumers' data available on the dashboard
- Staged onboarding of schemes with the majority of schemes participating within 3 to 4 years
- The inclusion of state pension data
- A commitment to multiple dashboards, with a non-commercial dashboard being overseen by the Money and Pensions Service (previously the Single Financial Guidance Body).

### **Changes to benefits paid to mixed age couples**

Currently a couple moves from receiving working age benefits to pension age benefits when the older partner reaches State Pension age (SPa). The government has [announced](#) that from 15 May 2019 this transition will take place when the younger partner reaches SPa. Mixed age couples with a partner under SPa who are already receiving Pension Credit or pension age Housing Benefit will not be affected by the change.

## **TPO**

### **PO-19673 Estate of the late Mrs N v Derbyshire County Council**

The above [case](#) was determined by the Ombudsman on 26 March 2019 who found in favour of the Applicant.

The case was brought by the husband of the late Mrs N who had been approved for ill health retirement benefits but passed away as an active member shortly before her employment with the Council was terminated. Consequently, a lesser death grant was paid to her husband, Dr Y. The complaint concerns the leaving date set by the Council after it awarded Mrs N ill health retirement benefits.

### **Recoupment in overpayment cases factsheet published**

TPO have published a [factsheet](#) setting out TPO view that the Pensions Ombudsman is a 'competent court' for the purpose of section 91(6) of the Pensions Act 1995 when making Determinations for recoupment in overpayment cases.

## **TPR**

### **TPR publish regulatory intervention report on Oxfordshire Pension Fund**

TPR has published a regulatory [intervention report](#) outlining how it worked with the Oxfordshire Pension Fund to improve the fund's governance and administration.

## **Other news and updates**

### **The Civil Partnerships, Marriages and Deaths (Registration Etc.) Act 2019**

[The Civil Partnerships, Marriages and Deaths \(Registration Etc.\) Act 2019](#) received royal assent on 26 March 2019. The Act allows the Secretary of State for Women and Equalities to consult on and create legislation needed to permit mixed-sex civil partnerships in England and Wales. The Act provides that the legislation must be completed in time for the first mixed-sex civil partnerships to take place before the end of 2019.

### **Timeline regulations updated**

As reported in [bulletin 183](#), the Financial Guidance and Claims Act (Naming and Consequential Amendments) Regulations 2019 amended regulations 75(3) and 77 of the LGPS Regulations 2013 and regulations 70(3)(e) and 72(3)(e) of the LGPS (Scotland) Regulations 2018. The Timeline regulations have been updated to reflect this change, see:



- [LGPS Regulations 2013](#) page of [www.lgpsregs.org](http://www.lgpsregs.org)
- [LGPS Regulations 2018](#) page of [www.scotlgpsregs.org](http://www.scotlgpsregs.org)

### **Tell Us Once notifications**

On 9 April 2019 Lorraine Bennett forwarded an email from DWP concerning action that must be taken to ensure that pension notifications continue to be received. The email is attached to this bulletin as [Appendix 1](#).

The Canopy Digital Connect (CDC) messaging service which is currently used to provide public sector pension schemes with notification from the Tell Us Once system is to be replaced by an Employee Authentication Service Replacement (EASR) token.

DWP reported that they have received responses from all LGPS administering authorities who participate in the Tell Us Once system. DWP will be contacting nominated Champions about the next steps in the coming weeks.

### **Communications working group minutes published**

The Communications working group met on 3 April 2019. You can read the minutes on the [Communications working group](#) minutes page of [www.lgpsregs.org](http://www.lgpsregs.org). Topics discussed at the meeting included:

- Member videos
- Employer online training
- Retention policy and GDPR
- Annual Benefit Statements – producing a list of data items to be included in active member statements from 2020
- Communications work plan for 2019/20
- Communicating with members via social media

### **The Finance (No.2) Act 2017**

In [bulletin 170](#) we reported that the government announced in November 2017 the policy to make employer NICs payable on termination payments above £30,000 from 6 April 2018. The introduction of employer NICs on termination payments above £30,000 was subsequently delayed to take effect from 6 April 2019. The government has since [announced](#) in November 2018 that there has been a further delay and the introduction will now take effect from 6 April 2020.

### **Updates to guides and factsheets**

Bulletin 182 published in March 2019 contained the annual updates for 2019/20. We have revised and published a number of our guides, sample letters and leaflets to take account of these changes. Tracked and clean versions of the documents listed below are available on:

- the [Guides and sample documents](#) page of [www.scotlgpsregs.org](http://www.scotlgpsregs.org) and
- the [Guides and sample documents](#) page of [www.lgpsregs.org](http://www.lgpsregs.org).

<b>England and Wales</b>	Version
Annual Allowance – Factsheet for members	1.6
A member’s guide to AVCs	2.0
Councillors – update for councillors in England	1.9
Councillors – Full guide	1.9
Introductory leaflet for councillors in Wales	1.6
Employees’ Brief Scheme Guide	2.0
Employees’ Promotional leaflet	1.6
HR Guide	4.0
Lifetime allowance – factsheet for members	1.6
<b>Scotland</b>	
Annual Allowance – Factsheet for members	1.6
Lifetime allowance – Factsheet for members	1.6

Updated versions of the Full Scheme guide and the Payroll guide will be published in May 2019.

### **Money and Pensions Service Business Plan and listening events**

The Money and Pension Service have published their [Business Plan](#) setting out their business priorities and plans for the future. It confirms that for the initial ‘transition’ year, customers will still be able to access services through Pension Wise, The Pensions Advisory Service (TPAS) and Money Advice Service (MAS). ‘The new joined-up Money and Pension Service offer can go live to customers in 2020/21’.

A number of [listening events](#) for stakeholders will be held across the UK between April and June 2019. The aim of the events is to help shape the future vision and strategy of the Money and Pensions Service and they welcome attendees from local government, employers and practitioners.

### **Pension administration software framework to go ahead**

The National LGPS Frameworks team have been working with several founding authorities to assess the viability of setting up a Pensions Administration Software framework primarily in support of the LGPS. At the end of March they made a decision to go ahead with the establishment of the framework.

The initiative has the support of central government including MHCLG and Cabinet Office. It is currently anticipated that the framework will be available for funds to use within 12 -14 months.

More information is included in the [brief](#) attached to this bulletin as Appendix 2.

If you are interested in finding out more about this project or would also like to be involved or listed as providing support, please contact [Pippa Bestwick](#), Programme Director, National LGPS Frameworks.

## Technical queries

At the Pension Managers' Conference in December 2018, it was agreed that the LGPC Secretariat would publish information about the number and type of technical queries they have responded to each quarter. This is the first update following that decision and is based on the 187 queries the LGPC team responded to in the period 1 January to 31 March 2019.

15% of the queries related to issues specific to events occurring in this period – employee contribution rates, APC limits and Pensions increase to apply from April 2019, cost cap and the implementation dates of new GAD factors. The [MHCLG transitional guidance table](#) provides additional information about the implementation of new factors.

21% of the queries concerned deferred member options, transfers out, AVC options and AVC transfers. The AVC technical guide provides comprehensive information on member options and the AVC template letters can be used to communicate these options to members when certain events occur. Both can be found on the [Guides and sample documents](#) page of [www.lgpsregs.org](http://www.lgpsregs.org).

15% of the queries related to retirement, late retirement, requisite benefits, death grants, survivor benefits, trivial commutation and the application of supplementary PI to these payments. Supplementary PI is referenced in bulletins [183](#) and [181](#) and we will include a more comprehensive article on this topic in the May 2019 bulletin. We aim to publish a new survivor guide in May 2019 which reflects the changes brought about by the LGPS (Miscellaneous Amendment) Regulations 2018.

Queries concerning ill health and APP represented 7% of the total queries. We would like to remind administering authorities that if an IRMP certifies that a member was working reduced hours as a result of the condition that caused or contributed to the member's ill health retirement (Tier 1 or 2) that the APP used to calculate the ill health enhancement should be based on the pay the member would have received but for the hours reduction. CARE pension built up as an active member is based on pay the member actually received (or APP calculated in the usual way for any period of reduced or nil pay due to sickness absence), it is **not increased** to reflect the reduced working hours.

The [Statutory Ill Health Retirement Guidance](#) published by MHCLG is a useful source of information about ill health retirement from the 2014 Scheme. The guide can be found on the [LGPS Regulations 2013](#) page of [www.lgpsregs.org](http://www.lgpsregs.org).

Queries concerning high earners (Annual allowance, Lifetime allowance and protections) and aggregation (including concurrent adjustments and the vesting period) each represented 5% of the responses sent.

32% of responses sent were to queries on topics that occurred less than 5 times in the quarter.

## Training

### Circular 313 issued – Fundamentals Training

As confirmed in [bulletin 183](#) issued in March 2019, our 'Fundamentals' training programme will be held in London, Leeds and Cardiff between October and December 2019. For more information on the course content and how to book places, please see [Circular 313](#).

### Annual Governance conference

A further circular will be issued in May to confirm how to book a place at the Annual Governance Conference to be held lunchtime to lunchtime 23 to 24 January 2020 at the Principal Hotel in York. Places will be allocated on a first come, first served basis. If you would like to register your interest in attending this year's conference, please send a short email with the subject 'Annual' to [elaine.english@local.gov.uk](mailto:elaine.english@local.gov.uk).

## Wider landscape

### DWP publish guidance on GMP equalisation

DWP have published [guidance](#) on how the GMP conversion legislation might be used to achieve equalisation. Administering authorities should note that this guidance does not apply to public sector pension schemes. MHCLG and HM Treasury may decide on future changes that would affect the LGPS and this guidance provides information on the possible routes that could be taken.

### State pension guidance updated

DWP has updated the following guidance to take into account the new rates from 8 April 2019:

- [Your new State Pension explained](#)
- [How to increase your State Pension if you reached State Pension age between 6 April 2010 and 5 April 2015](#)

## Legislation

### United Kingdom

Act	Reference Title
<a href="#">2019/167</a>	The Welfare Reform Act 2012 (Commencement No. 32 and Savings and Transitional Provisions) Order 2019
<a href="#">2019/12</a>	Civil Partnerships, Marriages and Deaths (Registration etc) Act 2019
<a href="#">2019/383</a>	The Financial Guidance and Claims Act (Naming and Consequential Amendments) Regulations 2019
<a href="#">2017/32</a>	Finance (No.2) Act 2017

### Useful links

[LGA Pensions page](#)

[LGPS member website](#) (England and Wales)

[LGPS 2015 member website](#) (Scotland)

[LGPS Advisory Board website](#) (England and Wales)

[LGPS Advisory Board website](#) (Scotland)

[LGPS Regulations and Guidance website](#) (England and Wales)

[LGPS Regulations and Guidance website](#) (Scotland)

[Public Sector Transfer Club](#)

[Recognised Overseas Pension Schemes](#) that have told HMRC that they meet the conditions to be a ROPS and have asked to be included on the list.

## **LGPS pensions section contact details**

*If you have a technical query, please email [query.lgps@local.gov.uk](mailto:query.lgps@local.gov.uk) and one of the team's LGPS pension advisers will get back to you.*

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**Distribution sheet**

Pension managers (internal) of administering authorities  
Pension managers (outsourced) and administering authority client managers  
Local Government Pensions Committee  
Trade unions  
CLG  
COSLA  
SPPA  
Regional Directors  
Private clients  
The Pensions Regulator  
The Pensions Ombudsman

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