



Department
for Education

Consultation on proposals for implementation of the reformed Teachers' Pension Scheme in 2015

**Summary of comments received and
Government Response**

13 September 2013

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Introduction

Public service reforms

1. Following the recommendations of the Independent Public Service Pensions Commission (the Commission), chaired by Lord Hutton of Furness, public service pensions are being reformed to make them more sustainable and affordable in the long term, and fairer to both members and the taxpayer. People are living much longer, on average 10 years longer than was the case in the 1970s, This means that the cost of providing public service pensions, including teachers' pension, has increased by a third in the last 10 years. Despite recent reforms, most of those costs are being met by taxpayers. On 9 March 2012, the Department for Education (the Department) published a Proposed Final Agreement (PFA) which set out the design for a reformed Teachers' Pension Scheme (TPS). The key provisions of the reformed scheme include: a pension based on career average earnings; an accrual (build up) rate of 1/57th; and a Normal Pension Age (NPA) equal to State Pension Age (SPA), but with options to enable scheme members to retire earlier or later than their NPA. Full details are available at:

<http://www.education.gov.uk/schools/careers/payandpensions/b00204965/proposed-teacher-pension-scheme-reforms>

2. The reforms to the TPS will ensure that the scheme remains one of the very best available – with guaranteed levels of benefits and inflation proofing. It will provide members with a high-quality and sustainable pension that reflects their valued service to education, and will help employers to attract and retain excellent teachers.

Why the Department consulted

3. On 7 May 2013 the Department published the consultation document, Consultation – Proposals for implementation of the reformed Teachers' Pension Scheme in 2015. The consultation document set out the Department's proposals on the detail of how the PFA for the reformed TPS should be implemented (i.e. how it is proposed the new arrangements will work in practice) and sought views on the proposals.
4. The proposals set out: what the impact will be on those who enter the scheme on, or after, 1 April 2015; and the transitional arrangements for current scheme members, including for scheme members with protections. The consultation enabled members, employers and other interested parties to identify, and express views on, any issues associated with the implementation of the reformed scheme, including anything on equality and additional burdens.
5. The consultation represented a key step in the process of public sector pension reform which began with the Government's commitment to review the long-term affordability and sustainability of the public service pension schemes. It was not, however, about the detail of the PFA, which had already been determined following separate detailed negotiations and consultations.

Consultation process

6. The consultation ran from 7 May 2013 to 28 June 2013. The consultation document was available on the Department's website and responses could be returned to the Department for Education by email or by post.
7. On publication, details of the consultation were sent to all key stakeholder groups and representative bodies, including the teacher unions and employer associations. The Department also ensured that the consultation document was publicised prominently on the scheme administrator's (Teachers' Pensions) website, and that members and employers could easily link to it from there. In addition, the Department has proactively engaged and met with unions and employers to discuss the proposals, before, during and after the consultation process.

Summary of responses received and the Government's response

8. In total 73 written responses were received. These included responses from teachers and head teachers, teacher unions, schools, colleges and other education establishments, employer representative groups and a faith organisation. The one response which fell into the 'other' category was from a pension administration software supplier.

| Type of Respondent | Responses | |
|-------------------------------|-----------|-------------|
| HT/Teacher: | 34 | 47% |
| Trade Union: | 12 | 16% |
| School: | 11 | 15% |
| Employer Association | 3 | 4% |
| College: | 4 | 5% |
| Local Authorities & Councils: | 5 | 7% |
| University | 2 | 3% |
| Education Faith Association: | 1 | 1% |
| Other | 1 | 1% |
| Total: | 73 | 100% |

9. The Department has considered each response and a summary of the main points raised under each section and question of the consultation, along with the Department's final position, is set out below.
10. A significant number of respondents raised issues about whether the public sector schemes should be reformed, and the overall design for the reformed scheme, as set out in the proposed final agreement for the TPS. Those included claims that there is no need to change the existing structure for the TPS; the scheme as currently designed is affordable and fair; and that moving the normal pension age for teachers to the state pension age is not appropriate given the physical and mental demands of teaching.
11. The Department recognises that there is a significant amount of opposition to the overall proposals for reforming the TPS. However, the Department considers that Lord Hutton clearly set out the case for change and notes that the issue has been the subject of much discussion and negotiation. Indeed, all of the issues raised by respondents to this consultation were considered within those negotiations, and in March 2012 the Government announced its final position on reforming the TPS. The PFA published at that time set out the structure of the reformed TPS, and arrangements for protecting those near retirement as well as the benefits all members have built up in the existing scheme.
12. This consultation centred on how the PFA is to be implemented. It covered the detailed proposals for how the reformed scheme will operate along with how the transitional arrangements, for members moving from the existing scheme to the new scheme, will work. Whilst the Department acknowledges the comments made in opposition to the overall reforms, this response concentrates on feedback from respondents on the Department's implementation proposals.

13. The Department also acknowledges that a number of respondents felt that there was too much detail in the consultation document, or that both the arrangements of the current scheme and proposals for the reformed scheme are difficult to understand. In putting the consultation together the Department recognised that there are a wide number of changes involved, and that there is a need to explain all of them in order to ensure that teachers and employers, and their representative bodies, are fully informed. It therefore attempted to explain things as straightforwardly as possible whilst still including enough detail to ensure stakeholders could assess and comment on the full range of changes involved.
14. The Department strove to strike a reasonable balance in the consultation document, supporting that with other tools aimed at providing individual members with further support to aid their understanding (e.g. the comprehensive advice about the current arrangements on the scheme administrator's web site, and the web based tool provided with the consultation that allowed individual members to see how they will be affected by the changes). The Department, nevertheless, understands and accepts that there is a need to strike a balance and provide effective on-going and targeted support to ensure all stakeholders can fully understand the changes involved. It will make sure that there is an appropriate focus on communication and understanding at each stage of the reform process.

Section 1: How career average pension will be calculated

15. The TPS provides a range of benefits for members to support them in retirement, and protections to ensure those benefits are calculated appropriately and fairly. The intention of the proposals on how pensions will be calculated in the reformed schemes is to introduce career average arrangements that are appropriate and effective, in particular arrangements that:
- are as straightforward and understandable as possible;
 - provide a best fit with the way the education workforce is paid and organised;
 - maintain similar options, methods and protections that exist in the current final salary scheme (for example, for maintaining the value of benefits both before and after they are drawn as pension, for converting part of pension to an optional lump sum, or for ensuring that those on sick or maternity leave continue to accrue benefits on a fair basis); and
 - are consistent with the proposed final agreement (for example, based on an accrual rate of 1/57th, provide for index-linking in line with CPI + 1.6% whilst the member is in service and CPI where not).
16. In light of those aims, the Department proposes that in the reformed TPS career average pensions will build up on a benefits basis and that indexation will be applied at the end of each scheme year, included to the benefits built up in the last scheme year. That is, each year a member will bank an amount of pension based on her or his pensionable earnings and the accrual rate (1/57th), and indexation will be applied to it each year thereafter, to keep it at an up to date value. Whilst this is inevitably different to the basis on which final salary pensions accrue (where salary at retirement and years' service determine the final amount), it is the approach that best fits with the aims for the TPS – for example, it will enable members to clearly see how their pension is building up and growing, and fits well with additional flexibilities to allow teachers to build up additional pension savings.
17. The key elements covered include:
- how scheme members' pensions will be calculated;
 - how benefits and pension will be adjusted each year to maintain their value (index-linking);
 - how pensions, and index-linking will be calculated where people leave draw their benefits during a financial year;
 - the effect of a break in service on benefits and index-linking;
 - how pensionable earnings will be determined;
 - when benefits will be accessible, i.e. at what age; and

- member and employer responsibilities in checking annual benefits statements.

18. The Department asked the following specific questions in respect of the proposals for calculating benefits and is grateful for the responses received about those and the proposals themselves are summarised below:

| | | |
|---|-------------|-------------------|
| Q1 Are the proposed arrangements clear, and, if they are not, what further guidance or support would be helpful? | | |
| There were 69 responses to this question. | | |
| 34 (50%) Yes | 25 (36%) No | 10 (14%) Not Sure |

19. A significant amount, nearly 23%, of those who responded indicated that they were opposed to the overall reforms and that seems to form the main basis of their concerns about the reformed scheme appearing complex; including how different it is to the current scheme. The Department’s response to concerns about the case for scheme reform is set out in the summary above.
20. Other comments on the proposals, from those who were concerned about clarity, indicated that individual members are still unsure about how the transitional protections will apply to them, or how benefits will build up compared to the current scheme. A number of respondents also pointed to how involved the indexation arrangements are, and suggest that further examples are provided along with a table to demonstrate in more detail how pension will be revalued in a range of cases, including for people with more than one TPS job. There was also a request for an on-line calculator to assist members to model their position.
21. Respondents also pointed out the key role that employers will play in implementing and maintaining the new arrangements, and that consequently it is imperative that they are supported and encouraged to perform that role effectively.
22. A number of those who commented that the arrangements were clear, nevertheless, indicated that it is important that on-going clear communication continues throughout the reform process.

Government’s response

23. The Department acknowledges that the arrangements for calculating benefits will be significantly different and the arrangements for index-linking pensions are unavoidably complex. It has sought to ensure the arrangements best fit with the needs of the teaching workforce, and current arrangements, as well as to ensure simplicity where possible. The Department welcomes proposals on how understanding can be improved and built upon and will act to ensure that the new arrangements are explained as clearly and effectively as possible, and to help members, employers and other stakeholders to further understand them.

| | | |
|---|------------|-------------------|
| Q2 Are there any further issues the Department needs to consider in deciding whether or not to take account of residential emoluments as part of scheme member's pensionable salary? | | |
| There were 54 responses to this question. | | |
| 26 (48%) Yes | 7 (13%) No | 21 (39%) Not Sure |

24. Almost half of respondents indicated that there are further issues the Department should consider, and argued that residential emoluments should continue to be taken into account within pensionable salary. The factors they consider the Department needs to look at included:
- that removing the provision would make recruitment and retention more difficult, especially amongst schools leaders and for schools offering specialist provision not provided elsewhere;
 - that some state schools use this facility;
 - that the payments involved do not represent a significant risk given the controls in place;
 - that teachers pay tax on the amounts involved; and
 - that the move would unfairly disadvantage the current and future members involved.
25. Other respondents tended not to offer a strong view that residential emoluments should no longer be taken into account, and less than 13% indicated that they felt there were no other issues that the Department needed to take into account.

Government's response

26. The Department proposed that residential emoluments should no longer be taken into account within pensionable salary. This stemmed from the view that their inclusion represents a risk to, and administrative burden on the scheme when few teachers in the public service receive such payments in kind.
27. The Department has considered the representations made and accepts that there are other factors that need to be taken into account in considering this issue. In particular, it accepts that the capacity to include residential emoluments does help with recruitment and retention to some key posts, and that overall the risks to scheme costs are well managed and small (through the limit on how much can be taken into account and the fact that there are only a few hundred recorded cases). As a result the Department has decided to drop its proposal and to take account of residential emoluments within pensionable salary in the reformed scheme, and to continue to do so in the current scheme.

| | | |
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| Q3 Will the proposal help employers and scheme members to do more to ensure the accuracy of pension related data and thus benefits? | | |
| There were 62 responses to this question. | | |
| 12 (19%) Yes | 32 (52%) No | 18 (29%) Not Sure |

28. The Department considers that the proposed new arrangements will make it easier for members to understand and check how their pension is building up. Each year it will be clear what earnings have been recorded and taken into account and that is the key factor in determining the amount of pension built up in the year. Employers will continue to be responsible for submitting that information and the fact that each year's salary data is key to pension build up will help them by, for example, ensuring any errors and issues are more likely to be spotted near the time they occur, rather than at the end of a member's career as tends to be the case in the final salary scheme.
29. There were 62 responses to this question. The majority of respondents indicated that they did not feel that the proposals would help improve the accuracy of pension related data, and another 29% said they were not sure. However, very few of those pointed to anything in the proposed scheme arrangements that is a factor in their concluding that data accuracy would not improve. Those that did pointed to increased complexity in gathering data due to two sets of arrangements running at once.
30. The key factors that are seen as barriers to improving data are in fact either administration related or involve wider education policy, as follows:
- need more advice and support for members, employers and payroll providers;
 - need more co-operation between the scheme administrator, employers and payroll providers;
 - lack of incentive for employers to get data right/no penalty if they get it wrong;
 - increase in number of academies means there are more smaller employers who are not used to submitting data;
 - removal of pay scales makes data submission and checking more difficult; and
 - annual benefit statements must be clear and comprehensive.

Government's response

31. The Department welcomes the comments received and accepts that there will be complications associated with two sets of arrangements running concurrently. However, the Department has attempted to minimise that by making the proposed

overall arrangements as clear and uncomplicated as possible, and ensuring the new arrangements mirror current ones as far as possible.

32. The Department accepts that there is a need for clear advice, guidance and communications between all parties if data improvements are to be fully realised, and member and employer understanding enhanced. Furthermore that there is a need to take proper account of new and changing stakeholder needs, use key communication tools (like annual benefit statements) effectively, and appropriately adapt administration arrangements to take account of wider changes like those happening to teachers' pay. The Department is working very closely with the scheme administrator to ensure that all these factors are addressed. Indeed a detailed communication strategy is being developed which, for example, covers things like proposed engagement with payroll providers, in order to ensure that appropriate communications and advice are made available to help all stakeholders understand the new arrangements.

Section 2: Death grants and dependants' benefits

33. The Teachers' Pension Scheme includes a range of insurance type benefits that help members to provide financial protection for their families in the event of their death. The benefits payable are dependent on a number of factors, such as whether the member is in service, out of service or a pensioner, and whether the members has sufficient qualifying service to provide pensions. The benefits can include a death grant, short-term pensions and long-term pensions. If a member qualifies for personal benefits they also qualify to provide short-term and long-term pensions to their dependants.
34. The consultation proposals are aimed at maintaining the full range of such benefits, and at a similar level, as is provided in the current scheme (i.e. representing the same proportion of the member's benefits). Some changes are needed to the mechanics of how the benefits are calculated, because care benefits are calculated on a different basis, i.e. they relate to the amount earned each year rather than an amount of service and final salary. The proposals will account for that and achieve the aim that the beneficiaries of TPS members will still enjoy access to the same range and scale of benefits.
35. The Department asked the following consultation questions about death grants and dependant's benefits.

| | | |
|---|-------------|------------------|
| Q4 Are the proposed arrangements for death grants and dependants' benefits clear and, if not, what further guidance or support would be helpful? | | |
| There were 59 responses to this question. | | |
| 35 (59%) Yes | 16 (27%) No | 8 (14%) Not Sure |

36. The majority of respondents felt that the information was clear whilst 27% felt that the information was not clear. Around 65% of those were current teachers who pointed to these parts of the scheme being less familiar to most members, and indicated that there should be more explanation of the current provisions and any difference between them and the new provisions.

Government's response

37. The Department acknowledges these responses and accepts that the death grants and dependents' benefits elements of the TPS are involved and are often less well understood by the membership. The Department did attempt to set out the changes clearly in the consultation document and to suitably explain the difference with current provisions. However, it accepts that this can be a difficult area to relate to, and that there is a need to add to the advice and guidance provided to further improve member and employer understanding. The need to address this issue is built into the communications plan that the Department is building with the scheme administrator, and through that this is addressed effectively.

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| Q5 Do you agree that the Department should amend the arrangements for enhancing dependants' pensions where a scheme member dies in service to better target them to those in most need, in line with the ill-health retirement arrangements? | | |
| There were 56 responses to this question. | | |
| 28 (50%) Yes | 17 (30%) No | 11 (20%) Not Sure |

- 38. 50% of the respondents agreed with the proposals, indicating that they consider it appropriate and fair to better target benefits to need in this way.
- 39. For those who disagreed with the proposals, two main views were expressed. The view that it does not necessary follow that the financial burdens on younger dependants will be more severe than those on older ones and younger beneficiaries will have longer to recover financially than older beneficiaries do.

Government's response

- 40. The Department welcomes these responses and acknowledges that it will not necessarily always be the case that the beneficiaries of younger members have greater needs than those of older members. However, the Department remains convinced that the proposal, to move to basing the enhancement on half of the period left to normal pension age, is the most appropriate. That will better help the beneficiaries of those who die young or after little service, whilst still providing a reasonable uplift to those beneficiaries who have more service. Here the Department takes the view that younger teachers are less likely to have prepared for such events occurring, and it is more likely that their death will have a significant financial impact on their dependants given that the member will have accrued smaller benefits as a result of shorter service. Ultimately, the Department also considers that the proposals provide a fairer basis for determining such enhancements, whereby there is a consistent approach for all rather than the current arrangements which are skewed in favour of length of service.

Section 3: Ill-health benefits

41. The proposals for the calculation of ill health benefits set out in the consultation are based around the Department's intention to maintain the provision of ill health benefits as in the current scheme.
42. The key elements of those proposals are:
- the qualification period for ill-health benefits will remain as two years' qualifying service;
 - maintaining the two-tier ill-health arrangements which link the level of pension awarded to the severity of a scheme member's illness or injury;
 - any enhancement paid will continue to be based on half the remaining service that a member could have been completed before reaching the NPA (equal to SPA in the reformed scheme); and
 - access to short service serious ill-health grants for scheme members, with more than one year but less than two years' service, who are suffering from serious ill health, (i.e. they have a life expectancy of less than one year) will continue.
43. In addition to maintaining the current provisions, the proposals outlined some areas where the Department considers that arrangements should be improved. In particular, to extend the time limits for making in-service applications from six months to two years for those members who are forced out of teaching due to slow-to-develop, or difficult-to-diagnose conditions, or conditions where it is difficult to access suitable treatment quickly. This will help them by giving them a longer period of time to demonstrate that they meet the incapacity criteria and longer to access an enhanced ill health pension if appropriate.
44. The Department also recognised, following discussion with stakeholder groups, that the salary used to calculate any enhancement needs to take account of whether a scheme member has reduced their hours or taken a post of less responsibility (stepped down), as part of steps taken by their employer to help manage the illness – otherwise their enhancement might be unfairly reduced. Consequently, it is proposed that in such circumstances the salary used for calculating any enhanced pension would be the higher of full-time equivalent salary at retirement or the re-valued full-time equivalent salary (i.e. with indexing to bring it up to the present-day value) from the point at which the individual reduced hours or took up the post involving less responsibility.
45. Finally, the Department recognised that the arrangements for calculating short service serious ill health grants are overly complicated. Consequently, it proposes that all members who qualify for this in the future get the maximum amount that is currently payable, i.e. two months' pay.
46. The Department asked the following specific questions in respect of the proposals for maintaining ill health benefits in the reformed scheme.

Q6 Will the Department’s proposals for calculating ill-health benefits and short-service serious ill-health grants ensure scheme members continue to be appropriately supported, or is there anything else the Department needs to consider?

There were 57 responses to this question.

| | | |
|--------------|-------------|-------------------|
| 22 (39%) Yes | 11 (19%) No | 24 (42%) Not Sure |
|--------------|-------------|-------------------|

- 47. 39% of respondents agreed that the proposals are fairer and will better support scheme members who are ill, that included the larger teaching unions and employer associations. Respondents, for example, welcomed the moves to protect those who step down to a lower paid role as part of managing their ill health.
- 48. 42% amount indicated that they were not sure there would be an improvement, whilst a smaller number felt the proposals would not lead to better support for ill teachers.
- 49. It is not clear what led to most respondents being either not sure about the value of these proposals or of the view that they will not improve matters. However, a number of the respondents involved indicated that they have little knowledge of the ill health arrangements and thus felt it difficult to comment. A small number also indicated that they felt that the arrangements depend too much on the discretion of the employer, and thus they felt the improvements will make little difference.

Government’s response

- 50. The Department has carefully considered the responses to this question. It believes that the proposals will build on the current arrangements to ensure fair access to support where retirement on ill health grounds is appropriate, and to a level of support that protects members adequately.
- 51. Within that, the Department considers that the negative or unsure responses to its proposals here are largely born out of the misapprehension that the award of ill health retirement is too dependent on employers or a lack of experience of the current arrangements. Whilst it is clearly imperative and appropriate that employers work together with their employees to manage ill health issues, as is the case now, ultimately the decision to award ill health benefits will continue to rest firmly with the Department.

| | | |
|--|-------------|-------------------|
| Q7 Will the Department’s proposals for extending the time limits for making an in-service ill-health retirement application be sufficient to appropriately help those with difficult-to-diagnose or degenerative illnesses? | | |
| There were 60 responses to this question. | | |
| 26 (43%) Yes | 13 (22%) No | 21 (35%) Not Sure |

- 52. 43% of respondents welcomed the proposals, with 35% unsure as to whether they would help those with slow to develop illnesses or and 22% against them. Those who did not support the proposals tended to be employers who were concerned that the arrangements would be difficult to administer and costly to the scheme. Some teachers and head teachers indicated that they did not support the proposals, but did not specify the reasons why.
- 53. One respondent requested that the Department consider allowing those who are awarded unenhanced benefits the opportunity to apply again at a later date if their condition worsens and they think they now qualify for enhanced benefits.

Government’s response

- 54. The Department has carefully considered the responses to these questions and intends to implement the proposal as outlined in the consultation document; i.e. to maintain the arrangements for ill health benefits as now, whilst refining the time limits to assist teachers with slow-to-develop or difficult-to-diagnose conditions.
- 55. The Department accepts that there will be administration issues associated with the change but believes that extending the time limit for making an ‘in service’ application (i.e. one that is judged against the unfit to teach criteria and where enhanced pension can be awarded) will help employers. Within that, the two year period will operate alongside the current provisions, including the provision that allows an application to be considered as ‘in service’ so long as the teacher remains in an employment relationship with their employer. The Department considers that it gives employers and members another option, whereby if appropriate the employment relationship can be brought to an end without that meaning that the teacher is then confined to not being able to apply for enhanced benefits and having to prove they are unfit for all work to access their accrued benefits.
- 56. Within the above, the Department notes that some employers, who indicated they were not in favour of the proposal, were under the misapprehension that they would be required to maintain the employment relationship for the two year period, which as above is not the case. The Department, nevertheless, accepts that clear communication and guidance will be needed to ensure this provision works to its best effect for both employers and teachers, and it will ensure that that is provided.
- 57. The Department does not plan to change the current arrangements whereby the level of benefit payable is determined on the basis of the member’s original application for benefits. It considers the system whereby enhanced benefits are

only available where the member has recently left teaching and is at that time incapable of any other work is effective, and provides a fair level of support that is affordable to the membership as a whole.

Section 4: Transition

58. The intention of these proposals is to ensure:
- that reforms are introduced in a way that helps scheme members to have ample time to adjust their pension saving accordingly (through, in particular, providing protection for those members who are near to their current NPA and protecting benefits already built up);
 - the arrangements effectively support and protect members who move from the final salary to the career average arrangements; and
 - the effect of the changes on individual members is clear.

The key elements of the proposals are set out in section 4 of the consultation document.

59. For current members of the TPS who will move to the reformed scheme, the proposals set out how the move will affect their benefits. In particular, it deals with how members' and dependants' pensions and lump sums, along with other benefits such as Ill health, will be calculated for those members who have service in both the final salary and reformed schemes.
60. The proposals also set out the options that remain available to members, e.g. to choose when to retire and draw benefits. As now benefits will be available from age 55, or can be drawn after the NPA that applies to them.
61. The Department also proposed a change to the age limits on transfers, to allow a member who is over the final salary scheme retirement to choose to transfer benefits to another public service scheme if they change occupation late in their careers. This recognises that, in the future, transitional members may choose to work past their NPA in the current scheme and may also wish to change career after that age.
62. The Department asked the following specific questions in respect of the proposals for transition.

Q8 Are the proposed arrangements sufficiently clear to help ensure that scheme members can effectively manage the transition to the new arrangements?

There were 60 responses to this question.

17 (28%) Yes

31 (52%) No

12 (20%) Not Sure

63. 28% of respondents agreed that arrangements were clear, whilst 52% indicated that the effect of the arrangements were not clear, many respondents took the opportunity to voice opposition to scheme reform as a whole, or individual elements of policy associated with it, like abatement or the fact that access to final salary benefits and care benefits will be linked to when the member retires.

64. A significant number of teachers or head teachers felt the arrangements are either unclear or were not sure about them. They pointed to the overall complexity of the changes, particularly for those moving between the current and reformed schemes. They also pointed to it being difficult to assess their own individual position.

Government's response

65. The Department fully appreciates that transition arrangements are involved and that the effect on individuals can be difficult to work through, not least because of the number of variables involved. In the consultation document it sought to explain the effects on individuals and their benefits as simply and clearly as possible, and, in association with the on line tool that accompanied consultation, to cover every scenario affecting members.
66. The Department welcomes the responses to the consultation and has considered them carefully. It remains of the view that its proposals for transition are appropriate and sensible and will proceed with them. That is, that the proposals will ensure the smoothest possible transfer to the new arrangements, whilst protecting members' accrued rights and maintaining good pension arrangements and options for all. Nevertheless, the Department will act to ensure member and employer understanding are a key focus. Within that, the Department will consider the helpful suggestions put forward by respondents, and will further develop the tools showing the effect on individual members
67. Issue around the validity of the case for reform have been covered above. The Department would, however, note the following in response to concerns about detailed policy issues.
- Abatement is a long standing feature of the public service pension schemes designed to protect the public purse where an individual who is in receipt of a retirement pension returns to work in employment covered by the pension scheme. The arrangements are necessary to protect the Exchequer in respect of members within the current final salary scheme.
 - The Department understands the claims, from some, that members with service in both schemes should be able to claim their respective pension benefits separately, i.e. their final salary and career average benefits separately. However, the Department proposes to maintain the current arrangement whereby benefits are only available where the member has left all scheme employment, and all benefits are paid at once – on the basis the individual has 'retired'.

| | | |
|--|-----------|-------------------|
| <p>Q9 Do you agree that transitional scheme members who have passed their final salary NPA and move within the public service should have the option to transfer their benefits provided their new pension scheme is within the Public Sector Transfer Club?</p> <p>There were 64 responses to this question.</p> | | |
| 40 (63%) Yes | 6 (9%) No | 18 (28%) Not Sure |

68. The majority of respondents were in favour of this proposal and agreed that the ability to transfer a pension to another public service scheme should be made accessible to those who work beyond their current normal pension age. Of the small number who disagreed most were worried about cost implications, though at least one suggested that this should be extended to allow transfers to any pension scheme. Those who were unsure tended to indicate that they had no experience with which to base comments on.

Government's response

69. The Department thanks respondents for their views and comments and will proceed with its proposals here. It believes the facility will help those who wish to go on working longer and help employers in the public service with recruitment – particularly of those with relevant experience in the public service.
70. The Department would note that this proposal does not represent a significant financial risk on the scheme, as transfer values are calculated on an actuarially cost neutral basis, and this is unlikely to increase the volume of transfer sufficiently to represent a further actuarial risk.
71. It is not proposed to extend this facility to allow post normal pension age transfers to private sector schemes. That is because the proposal is aimed at helping member and employers in moving (skilled staff) across the public service, but also recognises that there are risks associated with transferring pension provision outside of the public service so near an individual's likely retirement age.

Section 5: Pension flexibilities

72. The arrangements for reforming the TPS will ensure that members can continue to build up good pensions, ones which are guaranteed, index-linked and amongst the best available. However, as is the case now, some members will wish to build up additional benefits and/or to retire early, and consequently it is proposed that the TPS continues to offer a range of flexibilities to assist members here.
73. The Department therefore proposed to maintain the current flexibilities, including the option to purchase additional pension, to take actuarially adjusted benefits before normal pension age, and the option to take phased retirement. These options are designed to enhance member benefits and ease the transition from work to retirement.
74. In response to discussions with stakeholders the proposed final agreement included proposals for additional flexibilities in the reformed scheme, aimed both at allowing existing members to maintain their current retirement plans and at enabling members to have more choices in the future over saving and planning for retirement. Section 5 of the consultation set out the Department's proposals on how those new flexibilities will operate in practice.
75. The proposals also aim to help employers support teachers in their retirement planning, and for the flexibilities to operate in a way that does not place undue administrative burdens on employers and their payroll providers.
76. The Department asked the following questions in respect of scheme flexibilities.

Q10 Do the Department's proposals for the operation of faster accrual provide scheme members with sufficient flexibility whilst also being practical to administer by employers and payroll providers?

There were 64 responses to this question.

17 (27%) Yes

28 (44%) No

19 (29%) Not Sure

77. A significant proportion of respondents welcomed this additional flexibility, but around 44% said it does not provide sufficient flexibility or will be difficult to administer and understand. Of those, a significant number suggested there would be no need for this provision as the scheme should be left as it is, or that most members would not be able to afford the additional flexibilities, particularly the lower paid, part-timers or ethnic and disabled members. Those who were not sure of the value of this proposal tended to point to other flexibilities being available or affordability issues.

Government's response

78. The Department welcomes the comments received. It understands the concerns about affordability and administration issues but nevertheless considers this a valuable flexibility, particularly because it is different to the others in that it offers the opportunity to individuals to add to their pension without having to sign up to a long-term commitment or stump up a large cash sum all at once. To that end the Department considers it will offer more accessibility to the lower paid than the

current flexibilities do (for example, they will be able to use this facility at any stage of their career). It is also considered that the proposed arrangements offer an appropriate balance between offering a reasonable degree of flexibility to members (via 3 different accrual rates) and making them as easy to administer as possible (via the limited number of rates and a one year commitment to being involved).

The Department therefore proposes to proceed with this proposal but will ensure that it closely considers the needs of members and employers in implementing it, i.e. that guidance and processes are as simple and understandable as possible.

| | | |
|--|-------------|-------------------|
| Q11a Should the option to buy-out the actuarial adjustment features in the reformed scheme? | | |
| There were 62 responses to this question. | | |
| 21 (34%) Yes | 18 (29%) No | 23 (37%) Not Sure |

79. 34% of respondents agreed that this feature should be within the reformed scheme. 37% were not sure and 29% did not consider there was a need for the option to buy-out actuarial adjustments. Of the latter two groups, respondents tended to argue that this feature constituted an acceptance that teachers should not be expected to work past age 65 and that there was no need to change existing arrangements, or that this appeared too complex to be worthwhile.

| | | |
|--|-------------|-------------------|
| Q11b Do you agree with the Department's proposals for the operation of this option? | | |
| There were 60 responses to this question. | | |
| 7 (12%) Yes | 22 (37%) No | 31 (51%) Not Sure |

80. 37% of respondents disagreed with the Department's proposals that members be given a one-off opportunity to take this option on joining the scheme, the majority arguing that it was unrealistic to expect teachers to do so early in their career or that the other flexibilities were sufficient. The majority were unsure, citing the above reasons and the complexities involved, with 12% agreeing that the proposals are sensible.

Government's response (11a and 11b)

81. The Department is grateful for the responses received to the proposals for actuarial buy-out. It is recognised that the proposal is complex, and that this option may not appeal to all. It is different to the other flexibilities in that it offers members the opportunity to plan towards a specific retirement date/time, rather than plan by buying additional pension savings. The Department realises that this is, therefore, more likely to be attractive to those who have a retirement date in mind, including those who transfer to the reformed scheme from the current scheme with such a date in mind. But that does not mean that others will not find it attractive and it has to be considered alongside the complete package of flexibilities when considering both its value and issues like fairness and equality.

That is, each flexibility has features which will make one more attractive to some members than others, and as a package they offer a wide range of options to help members plan or save more for their retirement.

82. As to the mechanics of how this flexibility will work, it can only apply to future service, and consequently the Department considers that the only workable solution is that contained in the consultation proposal, i.e. that members are given the one-off choice to elect for this on joining the scheme. That way, the proposal gives members the option to cover the maximum service possible – i.e. from joining.
83. It is accepted that members joining the scheme for the first time may find it difficult to make such a commitment from the outset and that those members in mid-career who join the reformed scheme at this stage may find the flexibility more attractive. Whilst that may make this more attractive to some members than others, when taken with the other flexibilities, the Department considers that they offer all members something that can fit their circumstances – and thus the flexibilities as a whole are fair and equitable. The extent to which individuals can afford or choose to access such flexibilities will vary depending on a range of factors, other than level of earnings, and the Department does not accept that they favour some particular groups over others.
84. The Department does not accept that this flexibility is a signal that teachers should not be expected to work beyond 65. It was included with the intention of allowing members the option to choose to retire from age 65 onwards with an unreduced pension if they choose to do so.
85. Having considered responses and all the issues carefully, the Department proposes to implement this arrangement in line with what was set out in the consultation document.

Section 6: Academy trusts including multi academy

86. This proposal is aimed at reducing administrative burdens, enabling multi-academy trusts (MATs) to better manage the delivery of pension obligations. By way of an example, under current arrangements, employee service and salary returns must be submitted to the central pension administrator by each academy within a chain, whereas under the new arrangements a multi-academy trust will be able to submit a single return for all academies in the chain. The regulatory position will not be an enforced position, but will provide multi-academy trusts with flexibility to deliver their obligations to employees and the scheme as they decide with consideration of their wider administrative solution.
87. The Department asked the following question in respect of MATs.

| | | |
|---|-------------|-------------------|
| Q12 The intention is to ease the administrative burdens on existing arrangements, especially for MATs. Do the proposals outlined in this section address the main issues? If not, why not? | | |
| There were 47 responses to this question. | | |
| 12 (26%) Yes | 12 (26%) No | 23 (48%) Not Sure |

88. Around 25% of responses agreed with the proposal, 50% were not sure and 25% disagreed. Of those not sure, many indicated that they did not work or operate in the schools sector so did not understand the issue. Those who disagreed expressed concern about increasing burdens or wanted the LA authority to continue to have responsibility, and there were some enquiries about expanding the administration approach to other employer groups.

Government's response

89. The Department has considered responses fully and intends to go ahead with allowing MATs to act as the employers for TPS purposes. It believes that this will make accountability for completing employer duties clearer, as it fits with the fact that the MAT is the employer for all other purposes, and will not unduly add to burdens as MATs will, for example, already hold the data that is needed for pensions purposes.
90. The Department recognises that other employer groups may also be able to pool together functions and resources in order to realise administrative benefits. The Department will give further consideration as to whether the same position can be opened up to other employer groups.

Section 7: Premature retirement and further compensatory payments

91. The intention of this proposal is to maintain the premature retirement compensation (PRC) arrangements whereby employers can pay compensation to teachers who are being made redundant or are being released in the interests of the efficient discharge of the employers' functions. The compensation pays the costs of avoiding any actuarial adjustment to the teacher's pension, and any increase to the individual's pension if the employer chooses to award and purchase that. The only significant change involved comes about because there is no upper limit on the amount of service (and thus pension) that an individual can build up in the reformed scheme – and involves removing the associated limit that previously applied to the amount of premature retirement compensation awarded.

92. The Department asked the following question in respect of this proposal

| | | |
|---|-------------|-------------------|
| Q13 Do you agree that the proposed PRC arrangements will appropriately assist employers and members where early termination of employment is being considered? | | |
| There were 62 responses to this question. | | |
| 23 (37%) Yes | 19 (31%) No | 20 (32%) Not Sure |

93. The responses to this question were evenly mixed. Of those disagreeing or unsure a numbers of respondents said that employers should have to award PRC, and or aired concerns that schools do not award it often enough. A number of respondents in this category were from organisations that are not covered by the PRC arrangements, i.e. higher education institutions.

Government's response

94. There was no outright objection to the proposals in the consultation, rather general support to maintain the principles of PRC and update regulations where necessary to accommodate changes to the education system.

95. The Department proposes to implement the consultation proposals. This will enable employers to continue to use premature retirement compensation to purchase pension for teachers where that has been agreed as part of a termination plan. Amendments to the PRC regulations will therefore be taken forward, but please note that those are likely to be laid separately to the main TPS regulations associated with the rest of this consultation. That is likely to take place in September 2014, which will nevertheless ensure the PRC arrangements continue to apply appropriately, both before and after the reformed scheme is introduced.

96. Within the above, the Department has no plans to make PRC compulsory. The question of whether compensation should be awarded is a matter for the teacher and employer to determine together and is an employment rather than a pension related issue. Nevertheless, the consultation proposal will enable employers to

continue to pay such compensation where they agree that with the teacher involved as part of a termination package.

Section 8: Governance

97. This section sets out the Department’s proposals for the establishment of a Pension Board and Scheme Advisory Board for the TPS in line with Lord Hutton’s recommendations. The proposals suggests how the Board might operate by describing the main areas of responsibility, some of the operational functions and how the Board might be constituted. The Departments’ proposals reflect the statutory requirements set out in the Public Services Pensions Act 2013, and will establish both the TPS Pension Board and the TPS Scheme Advisory Board. The former will ensure that the members and employers have a greater influence over the administration of the scheme and the latter the opportunity to influence how policy is taken forward.
98. The Department asked the following specific question in respect of the proposals for introducing a TPS Pension Board for the TPS.

| | | |
|---|-------------|-------------------|
| Q14 Does the proposed remit, structure and operation of the Board provide scheme members and employers with the assurance over the administration of the scheme as recommended by Lord Hutton. | | |
| There were 64 responses to this question. | | |
| 14 (22%) Yes | 29 (45%) No | 21 (33%) Not Sure |

99. 45% of respondents felt that proposals would not provide members and employers with assurance over the administration of the scheme, 33% of respondents were unsure and approximately 22% felt that proposals would provide the necessary assurance.
100. This question prompted responses relating to the role of Secretary of State and officials as active members of the Pension Board; a number of alternative suggestions for the composition, membership, size and tenure of the Pension Board and support for proposals to use the existing Teachers’ Superannuation Working Group (TSWG) as the basis for establishing the TPS Scheme Advisory Board.
101. The majority of responses to this question expressed concern about proposals to include two officials as part of the membership with most respondents suggesting that officials should be involved in an advisory capacity rather than as a full member of the Pension Board. Related to this was the concern that official involvement could represent a conflict of interest as officials would determine both policy and steer implementation and as officials were not independent their involvement would sway the membership in favour of employers. One respondent suggested the pension board as proposed could not fulfil its remit because the Secretary of State’s powers were too wide, for example, he can appoint Pension Board members and set out how the board will operate in effect having control over all aspects of the Pension Board, and the remit of the Pension Board too narrow, that is, only able to operate within the Secretary of States set boundaries.
102. Alternative suggestions about the size of the Pension Board membership were expressed with some suggesting an expanded membership to that proposed in order to include a greater number of stakeholders on the Board. Others

suggested that places should be allocated based on the size of respective memberships with those representing the majority of employers having the greatest share of Pension Board places. Most respondents, however, believed that places should be allocated along the lines of a 50/50 split between employer and member representatives at the expense of official representation.

103. One respondent suggested that a realistic expectation of what could be achieved by a volunteer Pension Board at quarterly meetings should be acknowledged, it was felt that current proposals were over ambitious with the Board only able to have a superficial role in providing assurances on the scheme's administration to the Secretary of State.
104. Although we did not pose a specific question on the Scheme Advisory Board there was general consensus and support for our proposal to base any future model on the Teachers' Superannuation Working Group.

Government's response

105. Lord Hutton's report sets out the case for the introduction of a Pension Board for each public service pension scheme. The primary aim of the "Board" is to address the lack of a standard approach across government public service pension schemes and to give scheme members, taxpayers and others confidence that public service schemes are being efficiently and effectively administered. In acknowledging the recommendations made in Lord Hutton's report, the Public Service Pensions Act 2013 requires each scheme to establish a Pension Board and a Scheme Advisory Board.
106. The main function of the Pension Board is clear in primary legislation and its purpose is to assist the "scheme manager", in this case the Secretary of State, in the effective administration of the scheme, specifically in the matters associated with compliance to the pension scheme and related regulations and with any requirements imposed by the Pensions Regulator. The Secretary of State, in law, will retain overall responsibility for the scheme management.
107. The issue that concerned most respondents was the inclusion of officials at Board level, to understand the Departments position it may be worth confirming that the Pension Board is not intended to be independent of the Secretary of State.
108. The Secretary of State is the main stakeholder in the TPS with responsibilities and accountabilities to Parliament for the effective management of the scheme, it would, therefore, be inappropriate and wrong for the Secretary of State not to have officials as active members of the Board. The role of officials on this Board will be to ensure that the scheme operates within central government protocols, that the appropriate assurances are in place to protect the TPS fund and that central government policy relating to public service and general pension policy is delivered as intended within the TPS. In explaining the role and responsibilities of the Secretary of State and officials in relation to the Pension Board we do not believe a conflict of interest exists, which was another concern of raised by a number of respondents. Also in this model the 50/50 split between membership and employers would not be appropriate.

109. It is also important to stress that officials will be acting independently of any stakeholder group and will not as has been suggested align with employer representatives.
110. In keeping with Lord Hutton's recommendations, the Pension Regulator will develop a framework which will test, among other things, the transparency of operations within public service pension schemes. The Regulator will also add an additional level of independent scrutiny on the effectiveness and performance of the Pension Board. This will hopefully give reassurance to those respondents who are concerned that the appointment of officials onto the Board will fetter its independence and performance.
111. In drawing together proposals for the Pension Board officials looked at best practice in other pension schemes and listened to stakeholders before settling on the size and composition of the membership. In general respondents have tended to make alternative suggestions to enhance and reflect their own interest in terms of membership or to suggest increases to the membership to capture representatives from the wider stakeholder group. We acknowledge that in this instance we may want to review the size and composition of the Board in the future and probably after the Board has had the opportunity to settle in, consequently we will be seeking to introduce regulations that enable the Board to flex its membership in the future.
112. Similarly, we will be working closely with interested parties to ensure that the Board can carry out its functions in the most effective manner and making best use of time and expertise, this will be achieved by developing streamline processes and procedures to support the Board in meeting its responsibilities.
113. One respondent highlighted the need for caution over tenure of members advising the need to ensure continuity as members are appointed. We agree and it is our intentions to initially appoint members on flexible terms ranging from one to three years. This flexible approach will ensure continuity service and avoid the need to dismiss and reappoint members at the end of a three year period.
114. The consultation did not ask a specific question on proposals for the Scheme Advisory Board however we are grateful to those respondents who did make suggestions and proposals for developing this Board, unlike the Pension Board the Scheme Advisory Board will offer advice at the request of the Secretary of State on matters that relate to pension policy and impact on TPS.
115. Based on responses from this consultation and the good practice developed over the years mainly from the TSWG, we are currently developing more detailed proposals for taking forward this Board. Our intention is to consolidate existing arrangements for stakeholder engagement and develop a Scheme Advisory Board that reflects, as far as possible, existing arrangements.
116. The Department considers that the consultation proposals effectively deliver what is needed for the TPS to benefit from the new arrangements, and will therefore be taken forward.

Section 9: Additional consultation questions

117. The Department asked three additional questions in relation to the consultation proposals, aimed at gathering overarching views on how they help employers and members with career and retirement planning, and whether there are other issues the Department needs to consider.

| | | |
|--|-------------|-------------------|
| Q15 Will the proposals ensure the TPS continues to help employers to help scheme members manage effectively their careers and retirement? | | |
| There were 69 responses to this question. | | |
| 11 (16%) Yes | 38 (55%) No | 20 (29%) Not Sure |

118. The majority of responses had concerns with the overall reform proposals rather than the implementation. Here respondents generally expressed the view that they would result in teachers working longer, paying more and getting less.
119. Some respondents referred to the amount of complexity and options involved. They indicated that there is a need for further advice and guidance from the scheme administrator and the Department, as well as web based calculators and other tools to help members and employers with understanding.

| | | |
|--|-------------|-------------------|
| Q16 Will the proposals help scheme members to manage effectively their pension savings and plans? | | |
| There were 68 responses to this question. | | |
| 10 (15%) Yes | 38 (56%) No | 20 (29%) Not Sure |

120. Similar reasons to those expressed under question 15 were behind the negative or unsure responses. A number of respondents referred to the changes being about cutting costs and not supporting members, and some expressed that plans for normal pension age to move with state pension age are unfair and do not aid retirement planning.

| | | |
|--|------------|-------------------|
| Q17 Are there any additional administrative, equality or practical issues that the Department needs to consider in implementing the new arrangements? | | |
| There were 63 responses to this question. | | |
| 39 (62%) Yes | 8 (13%) No | 16 (25%) Not Sure |

121. A majority of respondents identified other things that should be taken into account. For example, some respondents suggested that the result of the overall changes will reduce pension benefits, and that will disadvantage women and those with disabilities disproportionately. Some respondents pointed to the need to gather further information on protected groups, for example, minority ethnic teachers, in order to be able to fully assess the impact on them.

122. Other responses concentrated on the view that further detail advice and support will be needed in order to implement the changes effectively, and support teachers, employers and payroll providers properly. One respondent pointed to the need to ensure that access remains open to teachers in academies and other schools outside local authorities' control.

Government's response to questions 15, 16 & 17

123. The Department thanks respondents for their comments. As set out under the summary section above, the Department acknowledges that there is a significant amount of concern about, and opposition to the overall proposals for reforming the TPS. The Department acknowledges the issues respondents have raised in respect of those concerns and views, however, the Department remains of the position that those issues were considered during discussions and negotiations leading up to the publication of the PFA, which established the structure of the reformed TPS.
124. This consultation centred on how the PFA is to be implemented. It covered the detailed proposals for how the reformed scheme will operate along with how the transitional arrangements, for members moving from the existing scheme to the new scheme, will work. The Department appreciates the additional comments and ideas respondents provided in relation to questions 15 to 17 and can confirm it will consider and act upon them. In particular, it will ensure that:
- communications continue with members and employers, and take place with other key parties to successful implementation, like payroll providers;
 - communications provide clear and simple information on what reform means for individuals, including consideration of further developing web models and calculators to help individual's understanding of the effect on them and the options/flexibilities available to them;
 - clear advice, guidance and support is provided to employers to enable them to fulfil their roles and fully utilise the pension scheme to support recruitment and retention of teachers;
 - suitable account is taken of the changes to the education landscape, for example, to ensure new scheme employers, like schools who become academies, provide tailored support and guidance; and,
 - procedures for sharing and capturing accurate data are robust and fit for purpose.
125. The Department acknowledges the equality issues raised by a number of respondents. The Department has given further consideration to equality related issues and alongside this consultation response is publishing an addendum to the Equalities Impact Assessment (EIA) (which was originally undertaken when the PFA was determined). The addendum gives details for those areas where implementation proposals are considered to give rise to further issues. Between the original EIA and the addendum, the Department considers that it has given due and proper consideration to equality issues, including those raised by respondents to this consultation.

126. Ultimately, the Department considers that the proposals for reforming the TPS are fair and proportionate in delivering the policy intention, which is to make the scheme sustainable and fair to both members and the taxpayer. Within that, the Department is sure that the Scheme will still deliver good pensions for teachers which are amongst the best available.

Next steps

127. Alongside this response to the policy consultation, the Department is launching the second-stage consultation presenting draft regulations covering the reformed scheme and consequential amendments to the existing arrangements. This consultation will start on 13 September 2013 and run until 11 November 2013. The draft regulations take account of views received through the first-stage consultation and reflect provisions laid out in the Public Service Pensions Act 2013.
128. Please note, however, that some parts of the overall reformed scheme regulations (for example, e.g. valuation and cost cap provisions) and some associated regulations (for example, on premature retirement and additional voluntary contributions) will be subject of separate development and consultation. It is currently planned to put them before Parliament in September 2014 which will enable them to come into effect alongside the main regulations in April 2015.

Annex A: List of respondents to the consultation

The following is a list of people and organisations who responded to the consultation (excluding those who have confidential responses).

Allsop, Patrick (St Paul's School)
Alter, Jean-Marc (Llantwit Comprehensive School)
Association of Christian Teachers, The
Association of Colleges
Association of School and College Leaders
Association of Teachers and Lecturers, The
Blurton, Sarah
Broad, Janet
Buckley, John
Callanan, Trevor (Radclyffe school, The)
Carlyle, Neil
Challis, Anna (Newquay Tretherras Academy)
City Bath College (Irene Nicholls)
Clifford, Caron (Wapping High School)
Connolly, John (Ounsdale High School)
Cooper, Ian
Cunliffe, Caroline (Greenbank High School)
Derby City Council
Duckett, Chris (Gosforth Academy)
Dunne, Liam
Farnell, Patricia
Gladman, Tanya
Hamson, Philip (Dixie Grammar School)
Hannavy, Kevin (Christ's Hospital School)
Heywood
Hockerill AE College (Mark Aldridge)
Hudson, Gillian (St Bees School)
IAPS
Independent Schools' Bursars Association
Jenks, Peter (St. Dominic's SFC)
Last, Stephen (Christ's Hospital)
Liverpool John Moores University (Jayne Brown)
Local Government Association
Manchester City Council
Merthyr Tydfil Council
NASUWT (Southampton)
NASUWT (Southampton City)
NASUWT, The
NASUWT Barnet Association (Nash Narenthira)

NASUWT Cornwall (Peter Waldron)
National Association of Head Teachers
North Yorkshire County Council
O'Reilly, Francis
Percival, Jake (Fallibroome Academy)
Ravenscroft, Andrew
Reynolds, Al
Reynolds, Alastair
Rist, Jonathan (Brunswick Primary School)
Roberts, L
Rolph, Michaela (Bunwell Primary School)
Scott, Chris (Caroline Chisholm School)
Smith, Graham (Rishworth School)
Smith, Justin
Surrey's Secondary Heads' Phase Council
Taylor, Steven (Hope Valley College)
Turner, Andy
Turney, Helen (Huntcliff School)
Undeb Cenedlaethol Athrawon Cymru
University & College Union
University and Colleges Employers Association, The - Group response
University Of Lincoln (Natasha Halsall)
Verhoeven, Babette (Aquinas College 6th Form College)
Voice the Union
Wallace, Nicholas
Ware, Heather (Great Ellingham Primary School)
Winter, Steven (Felsted School)
Young, Graham



Department
for Education

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