



Department
for Work &
Pensions

Technical changes to automatic enrolment

Government response to the consultation on exceptions to
the employer duties

February 2014

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Introduction

Since October 2012, employers are required to enrol all workers who ordinarily work in the UK into a workplace pension scheme, subject to age and earnings conditions. The roll-out of automatic enrolment started with the largest organisations and will be extended to all employers over the next five years.

Automatic enrolment is designed to target non-savers and under-savers. This includes those individuals whose employer provided a scheme, but did not pay into it; and those where the employer provided a pension scheme, but not one that everyone could access. It obliges every employer, irrespective of size or industry, both public and private sectors, to provide a work-place pension and pay into it.

Automatic enrolment has already evolved. There have been changes to the legislation to make automatic enrolment easier to operate since the original framework was laid down in 2008. The Coalition Government's review in 2010 introduced waiting periods; the automatic enrolment earnings trigger and gave employers more flexibility to choose their re-enrolment dates. The staging timetable has also been changed to give small employers until at least 2015 to prepare for automatic enrolment.

The technical changes introduced from 1 November 2013 aim to simplify enrolment processes and align better with payroll processes. We have provided, for example, an alternative approach to pay reference periods aligned to the tax calendar and simplified the process for collecting contributions from new joiners. We have also amended the legislation on Test Scheme Standards to deliver greater consistency across the various test schemes.

It has become apparent during the early days of live running that pension saving, or further pension saving, may not be appropriate for everyone. Currently, the legislation relies solely on the jobholder to determine whether they should opt out of pension saving.

In March 2013 we issued a consultation paper "Technical Changes to Automatic Enrolment: Public consultation on draft regulations and other proposed changes" <https://www.gov.uk/government/consultations/workplace-pensions-proposed-technical-changes-to-automatic-enrolment>

In it we described proposals to insert a clause in the Pensions Bill to provide regulation making powers to exclude workers of a prescribed class or description from the scope of automatic enrolment.

As well as setting out some ideas on how such a power might be used, we asked respondents to tell us if there are categories or descriptions of worker for whom automatic enrolment is inappropriate.

This report sets out the Government's response to the consultation on the exemption of certain categories of workers from the scope of automatic enrolment.

Executive Overview

The current arrangements for automatic enrolment were created and subsequently refined to make them as simple as possible to operate and communicate. Even so, there are some aspects that remain less straightforward for employers and their workers. We want therefore, to offer employers some more flexibility, so that in a limited number of specific situations, affecting only a small number of workers, employers are not obliged to go through the process of automatic enrolment. This will also benefit individuals for whom pension saving is not appropriate, who will not have to go through the process of being automatically enrolled and having to opt out. Accordingly, we consulted on a range of proposals to dis-apply the statutory obligation on employers to put certain groups of workers into pension saving.

In developing our proposals, we looked at how these might apply to employers, and in particular considered whether prohibiting employers from enrolling certain workers was likely to increase administration costs, rather than reduce them. We therefore need to consider where a new flexibility should be permissive, leaving it for individual employers to choose whether they benefit by adopting them.

We sought views on four situations, where further private pension saving may not be in the best interest of a worker. The responses received reinforced representations already made that there is a strong case for Government to permit employers not to enrol workers who:

- have tax protected status for existing pension savings
- are on the brink of leaving employment
- have given notice of imminent retirement
- recently cancelled membership after being contract joined

We remain confident that the right to opt out remains the most suitable option for all other workers who do not wish to remain in pension saving.

The next step is to develop proposals for workable exceptions that provide real value for both individuals and employers. We will also consider how to accommodate circumstances where an employer may not know about the person's individual circumstances (the tax issues are a prime example). We shall bring forward final proposals, with a draft Statutory Instrument for consultation in due course. Any regulations are subject to Royal Assent for the Pensions Bill currently before Parliament.

Tax protected status

Some individuals who have already accrued pension savings above the lifetime allowance are protected from tax charges, under enhanced or fixed protection provisions, provided no further tax-relieved pension contributions are made. Automatic enrolment puts these arrangements at risk because of the nature of the employer duty where the individual is automatically enrolled into a pension scheme.

At the moment the only option available to individuals with this protection is to opt out. If for any reason the jobholder doesn't do so within the statutory time limit they could face significant tax charges.

Opt out works because it undoes scheme membership, but both the employer and the individual will have been put through unnecessary inconvenience and expense. This is an experience which may have to be repeated every three years when individuals will be re-enrolled if they meet the eligibility criteria.

What the consultation responses said

There was strong support for the exclusion of individuals with an enhanced or fixed protection certificate and other tax-protected categories including those:

- who would exceed the lifetime allowance with further pension saving;
- paid a winding up lump sum under an agreement which prevents employees receiving further pension accrual; and
- taking a pension income using flexible drawdown.

The worst case scenario for a worker with tax protected status is that automatic enrolment and further pension saving could result in a significant and unexpected tax charge. These people already have a high level of pension saving and respondents felt that they are clearly outside the target market.

Respondents acknowledged that it may be difficult to identify them. An employer may not know that an individual has tax protection, especially if the pension wealth was accumulated in a former employment. Some respondents suggested an easement which would provide an extended opt out window (with discrete refund rules) leaving the onus firmly with the individual to opt out. Most favoured automatic exclusion but only where the individual has told the employer they have a tax protection status.

Responses flagged a similar problem with contractual enrolment into group personal pensions where workers with protected benefits are also at risk of losing their protection.

Government response

Workers with a pension-related protected tax status have accumulated pension wealth savings, or have pension benefits in payment, that put them outside the core target audience for automatic enrolment. The automatic enrolment problem is similar in all these situations. The person has reached the ceiling of tax-relieved pension contributions and further contributions, whether from the worker or the employer could invalidate declarations and result in tax charges.

There is a strong case for an exception from automatic enrolment and re-enrolment for individuals with a form of tax-protected status for pension savings or benefits. We recognise there are practical problems and the key question is how an employer would know. One approach may be to provide an exception only where the employer is aware of an individual's status with the onus on the individual to make the employer aware. If the employer does not know, automatic enrolment should proceed in the usual way and the individual can still opt out.

There seems to be less evidence to support an exception for people who are approaching their life time allowance but have not as yet applied for or been granted the relevant tax protection status. This would put too great an onus on the employer to decide whether they should or should not enrol the person. Opt out is the remedy in these situations. If protection is granted after automatic enrolment the individual can opt to leave the pension scheme, and any exception should prevent the need for re-enrolment.

The legal framework would not permit any exception under automatic enrolment to apply to contract joining and it is up to the individual to resolve this with their employer as an employment issue.

Jobholders leaving employment

Where someone hands in their notice, or is under notice of dismissal and their period of notice spans their automatic enrolment or re-enrolment date, the legislation currently obliges an employer to automatically enrol this person even though they know that they are about to leave their employment.

What the consultation responses said

In general responses agreed that requiring employers to enrol people whom they know are about to leave the company – whether by resignation or dismissal – imposes an unreasonable administrative burden. Some respondents said the employer duty makes even less sense if a person leaves during the joining window leaving the employer to enrol someone who has already left the company. Leavers brought back on to the payroll for a late payment are said to raise a similar problem. Another respondent suggested that automatic enrolment is not appropriate if there is a risk of redundancy.

Automatic enrolment –exceptions to the employer duties

Pension providers said that employer pension contributions form part of an employee's benefit package and an exclusion, however phrased, raises issues of fairness. Those under notice can opt out if they do not want to be automatically enrolled for a short space of time. Those leaving to take up a new job may be able to transfer their accrued rights to a new scheme.

Responses flagged practical considerations. Payroll systems generally do not record the date someone hands in their notice. Respondents were concerned about how easy it would be for payroll processes to identify these people quickly and exclude them from the automatic enrolment process.

Respondents felt that any exception should be permissive rather than mandatory. Another option put forward was to allow employers and their pension scheme providers to deem a worker to have opted out if they leave service during the opt-out period.

Government response

We recognise there are already a number of options for the individual themselves. They can choose to opt out, transfer their accrued rights or, in the future, have it transferred under measures for dealing with the automatic transfer of accrued rights. However, the automatic enrolment duty and the employer's administrative burden remain.

We consider there is a strong case for an exclusion for leavers but we need to give further consideration to the practical problems. Some employers may find it easier to automatically enrol in the usual way. We want to keep any provisions as simple as possible to ensure we do not add complexity to the administration of the automatic enrolment duty.

We need to consider how leavers might be defined, the relevance of resignation, dismissal or redundancy and timing. An exception should remove a nugatory employer burden but it needs to be fair to the individual, as well as simple to operate, so we have to consider opt in rights.

We don't agree that an exception should be made in respect of people at a risk of redundancy at a point in the future. If redundancy is an unspecified future possibility, that perhaps the employer may not have assessed, this does not seem to justify an exception.

We note the point that leavers brought back on to the payroll for a late payment should be exempt - but these individuals are not workers in relation to the employer and would be out of scope. This seems to be a processing question about contributions due on arrears of qualifying earnings. Similarly deeming opt outs would not be possible under the proposed power.

Individuals who have given notice of retirement

Where a member of a pension scheme gives notice of retirement it seems inappropriate to oblige an employer to enrol them again if the automatic enrolment or re-enrolment date falls within the notice period.

What the consultation responses said

Respondents raised a number of issues:

- Employers, accountants and employee benefit consultants supported the exclusion of eligible jobholders on the point of drawing their workplace pension benefits. Some providers, however, did not see a compelling case for an exception even though automatic enrolment may only be of limited value. They said auto enrolling people with a few years to retirement can still create a small fund. It is unlikely to be enough to provide a retirement income but could be paid in full under the trivial commutation rules. People who do not want to save can still opt out.
- Respondents could see little value in automatically enrolling workers who:
 - Have reached maximum accrual in their employer's scheme,
 - Are already in receipt of benefits from their sponsoring employer's scheme, or defined benefits from a previous employment pension.

They said automatic enrolment in these situations is unnecessary bureaucracy. It confuses people who have applied for their pension benefit or are getting their pension and is not in keeping with the intent of automatic enrolment.

- Other responses approached this on age rather than income grounds and suggested excluding workers within a year of State Pension age or those who will reach State Pension age in the month of enrolment. Some providers disagreed. State Pension age is not necessarily indicative of retirement.
- Another suggested that workers approaching age 75 should be excluded from the right to opt-in to a scheme using relief at source because the cessation of tax relief has implications for the minimum quality requirement. One respondent suggested that workers with their own personal pre-existing pension plan should be excluded from automatic enrolment.

Government response

We consider there is a case for an exclusion for individuals, who have given their employer notice of their intention to retire from employment. We will develop proposals to address a relatively small group – people whose retirement notice period includes the automatic enrolment (and re-enrolment) date.

We consider the other pre-retirement scenarios flagged in the responses are already covered by existing provisions or opt out is the appropriate solution.

Automatic enrolment –exceptions to the employer duties

Where an active member of a money purchase scheme gives notice of retirement, and ceases to be an active member, the employer duty to automatically enrol them straightaway (the immediate re-enrolment duty) is already turned off by Section 2(4) of the Pension Act 2008. It is the jobholder's choice to leave the scheme and there is no employer duty to put them back in.

We do not propose to create an exception for workers who have reached maximum accrual in their employer's scheme or are drawing defined benefits from a previous employment.

At the point of assessment it is unlikely that an employer will know anything about a worker's pension arrangements or pension wealth from a previous employment. We have no plans to make automatic enrolment more complicated by requiring employers to exchange this information and the data protection issues of such a proposal would seem to rule it out as an easement.

Nor do we think there is any merit in an exception for people in receipt of benefits from their current sponsoring employer's scheme. We accept that sometimes further pension saving may not be necessary. However, the underlying assumption being made by those responses who asked for this exception is that a pension benefit in payment is always good enough. We don't agree. Additional pension saving may be worthwhile. It depends on the individual's circumstances. The onus should be on the individual to opt out in these circumstances.

Automatic enrolment into an occupational pension or an employer's group personal pension gives access to the employer contribution. An exception on the grounds that an individual person has their own personal pension is not appropriate and would result in additional administrative burdens for the employer.

We do not intend to re-visit the debate about exemption on age grounds. On the point about excluding jobholders approaching age 75 from opt in because tax relief ceases at age 75, we have found no evidence that this is an actual rather than a speculative problem and we have no evidence of scale. People who choose to join a pension scheme at that point will be relying on an opt in right and we rely on their opting in with the full knowledge that their contribution is likely not to be tax-relieved.

Contract joining

Instead of automatic enrolment, some employers may choose to enrol all workers into a pension scheme when they start work often targeting all workers regardless of age or earnings. This can be with a more generous contribution than the prescribed minimum, and workers join the scheme before their automatic enrolment date.

Any individuals contractually enrolled who then cancel their membership may still have to be automatically enrolled when they become eligible jobholders for the first time, even if they have only recently left the pension scheme.

What the consultation responses said

Respondents felt that workers, whatever their jobholder status who opt out of membership on a contractual basis should not have to be automatically enrolled shortly after. Employers reported this is hard to explain, frustrating for the individual and an unnecessary administrative burden. They did however say that opt in rights should stay.

Government response

If an employer provides a workplace pension scheme with the job and the offering is as good, or better, than the automatic enrolment minimum, we can see that there is limited value in forcing the employer to go through a similar exercise almost immediately if the person cancels. We had originally consulted on a proposal to prescribe a period using section 3(4) of the Pensions Act 2008 to turn off the duty but found it would not work as needed.

There is a strong case to address this double handling and we shall develop proposals and return with draft regulations for consultation.

Serious ill-health

What the consultation responses said

Respondents felt workers absent from work because of long-term serious ill health or terminal illness should be exempt from automatic enrolment but acknowledged the obvious sensitivities and practical problems. An employer may not be fully aware of a worker's situation. Automated assessment would be difficult and an exclusion may require some sort of self-certification by the worker.

In the case of a terminal illness, a person may not be in a position to complete the opt-out process. Respondents urged the Government to consider a pragmatic and proportionate easement to allow employers to cancel the enrolment process where a jobholder dies within the joining window.

Government response

Although we recognise the sensitivities, we are not convinced that a blanket or mandatory exception on health grounds is appropriate because of the challenge of defining the scope of the exception and the practical challenges for employers. Employers may not know the full extent of an illness, and even if they do the information would have to be visible to payroll processes at the point of assessment. There also seems to be a danger of interfering with survivor rights.

Non-UK residents

What the consultation responses said

There are regulatory barriers for pension providers entering the automatic enrolment market with products for non-UK residents. The issue is not new but automatic enrolment has brought the implications more sharply into focus.

The issue is point-of-sale regulation. If a prospective member is resident outside the UK, (even if they ordinarily work in the UK) providers must have the appropriate regulatory permissions to conduct business in the country in which the individual resides. A contract, for example, could be illegal if the insurer is not registered as a provider of financial services in the country where the jobholder lives or if the investments are not registered there. For EU residents, the Distance Marketing Directive would make it illegal to contract with an employee resident in another EU state at a distance, without their prior agreement to the contract.

For UK-based providers to operate in other countries they would need to comply with the legal, tax and regulatory requirements in each country. Providers take the view that they cannot be expected to be fully conversant and compliant with the legislation and regulation of every non-UK territory. They believe that in order to eliminate any risk to any party to a deemed contract this is what would be required.

Providers said automatic enrolment should only apply to UK tax payers. Non-UK residents cannot receive tax relief on their contributions, so providers would have to set up dual administration systems. This adds complexity. A worker not entitled to tax relief who is automatically enrolled into a Relief At Source pension scheme is at risk of double taxation as the pension contributions on which they have already been taxed will be used to provide a taxable retirement income. Even then, non-UK resident workers may not be able to find an insurance company willing to provide them with an annuity.

Government response

The operation of automatic enrolment does not currently include a residency test. We recognise that selling pension products into an EU country where the provider is neither based, nor licensed to sell the type of product, nor passported to conduct the business is an issue for personal pensions (and remains an issue) under the Distance Marketing Directive. Providers handled the problem before automatic enrolment by declining the business. Providers can still avoid jeopardy by declining the business. Employers can use an occupational scheme for automatic enrolment.

This means that employers can satisfy the duty but might have to use two schemes. Some do anyway as part of the company pension strategy. The issue then becomes whether the scale and disruption to the industry and the make up of the majority of workforces justifies an exception. There is a balance to be struck between obliging employers to use two schemes and excluding people who are in scope.

Automatic enrolment –exceptions to the employer duties

The next problem is defining who might be excluded and how to keep an exclusion as simple as possible. If we only apply an exclusion to personal pensions we create regulatory arbitrage. If we apply it to occupational schemes we affect the rights of people who can access a workplace pension arrangement and for whom this is not an issue.

We have considered and ruled out an exception for any individual with an address outside the UK.

We do not propose to make provision for non-UK tax payers. These individuals may not be ordinarily working in the UK; that judgment is a matter for the employer. More likely on the limited evidence so far, they may be in a non EEA scheme and the Pensions Act 2008 has provisions that cover tax relief already

Jobholders - definition of worker

What the consultation responses said

A number of special tax arrangements have grown up over the years that allow waged/salaried workers Schedule D status for income tax purposes, or particular categories of workers a certified exemption from payroll taxation.

Responses from the entertainment industry, higher education sector and the accountancy profession said workers whose terms and conditions or wage structures reflect these arrangements should be excluded.

Responses from the retail and utility sectors said their non-executive directors should be excluded, even if they have a contract of employment. These are not individuals who typically rely on the employer for a livelihood and although paid for their time, should not be relying on that employer's pension scheme for an income in retirement.

Other responses suggested the exclusion of students, self-employed and Local Authority councillors

Government response

We do not propose to exempt workers with a contract of employment who also have Schedule D tax status. In the higher education sector HMRC have withdrawn the special payroll tax treatment for examiners from April 2014 and these workers are now in scope for PAYE and RTI returns. If they have worker status and qualifying earnings they will be in scope for automatic enrolment.

Non-executive directors with a worker's contract are in scope and we do not think it appropriate to create exceptions for particular industries.

Local Authority councillors who do not have a worker's contract are not covered by the employer duties. An exception is not needed.

There is no employer duty for students under age 22 and in work – although they can opt in. Students aged 22 and over and in work should have an opportunity to save,

Automatic enrolment –exceptions to the employer duties

with an employer contribution if their earnings are sufficient for automatic enrolment. We do not consider an exception is justified.

Jobholders - treatment of earnings

What the consultation responses said

A minority said the very low paid should not always be automatically enrolled. One response for example said that it is illogical that the payment of an annual bonus or a single spike in earnings could make someone eligible for automatic enrolment when at all other times their earnings may not be sufficient to take them above the lower contribution threshold.

Other respondents said that automatic enrolment should be turned off where a known pay reduction is imminent, perhaps due to a contractual change in working hours which would result in the loss of eligible jobholder status. Another suggested an easement to remove workers for periods where pay is zero from the scope of the duty.

There was some evidence that suggested administrative complexity would be reduced with an upper earnings limit on eligibility for automatic enrolment – perhaps at £100,000 per annum.

Government response

There was a provision in the original automatic enrolment regulations in 2010 to carve out the very low paid who trigger automatic enrolment because of isolated pay spikes. The resulting legislation was complex with record keeping requirements and assessment calculations out of all proportion to the benefits. It was revoked before it came into force due to popular demand. If a very low paid earner triggers pension saving because of an isolated spike they have a foothold in saving even if they are not making regular contributions. In the future, with the use of multi-employer schemes catering for this sector of the market and measures to address the challenge of small pots all pension saving will count. In any case the dual threshold approach – with an automatic enrolment trigger and contributions then due, at a minimum, from the much lower threshold, seems largely to have resolved problems associated with pay spikes.

Automatic enrolment assessment operates on the principle of assessment of earnings at the relevant time in real time, so an exception where a known pay reduction is imminent, or for periods where pay is zero is not appropriate and would create additional administrative burdens.

We have no plans to exclude very high earners. The evidence suggests they are likely to be in their company's pension scheme anyway or have tax protected status. If neither of these applies and they are not saving then they should have access to saving with an employer contribution and they can still opt out. In either case it is a decision for the individual to make.

New starters, short term and casual hires

What the consultation responses said

Respondents raised a number of issues:

- There was a minority view that new starters should be excluded for a probationary period, with safeguards to prevent employers from using “probationary periods” as a device to create an automatic deferment. Other respondents called for the exclusion of short term and casual hires, including workers engaged for less than a month; people with time-limited employment visas; workers with a contract period of less than three months; workers whose contracts are shorter than or equal to the joining window; temporary staff and workers whose earnings fluctuate.
- Some employers said the demands of automatic enrolment are out of balance with the make up of their largely temporary work force in place for a short period of time with relatively small levels of pay. This was a theme throughout responses from the events management industry. Respondents called for an easement where the employment is tied to a single event and the event lasts for a short period of time.
- Respondents acknowledged that employers can use postponement, but said this creates more administration, not least with a significant communication exercise to cover opt in rights. Employers said they will still need to arrange for a suitable qualifying scheme to be in place to cater for opt ins. Even acknowledging the underlying opt in rights, opt in is enrolment from a future date – usually the next payroll run - and the individual by that time may have left the employment.
- Alternative proposals included giving casual workers an opt-in right in lieu of automatic enrolment or linking short term contracts so that the duty only applied after more than say 5 months.

Government response

It is not appropriate to exclude new starters, temporary or casual staff, short term or zero hours contract workers. These people are likely to be part of the core target market who have traditionally not had access to a pension scheme and who are likely to be under-saving. Their exclusion would undermine the policy, jeopardise the reform consensus and exclude too many low paid or casual workers from pension saving. Postponement was designed to address these situations and the Government remains firmly committed to maintaining the broad policy coverage. We have no intention of excluding employers by size or sector or classes of occupation from the employer duty.

We note the points about the complexity and burden of information requirements. The Pensions Bill (Automatic enrolment: powers to create general exceptions)

Automatic enrolment –exceptions to the employer duties

provides for a more flexible approach and we plan to review the information provisions. Any regulations would be subject to Royal Assent.

Specific occupations and business sectors

What the consultation responses said

The film and TV industry claimed special treatment with a blanket exception to align with HMRC's Film Television and Production Industry Guidance Notes.

The university sector asked for tailored exceptions for international research fellows and visiting academics on secondment from an overseas university. There is a disproportionate administrative burden for no financial benefit for academics seconded from overseas with adequate pension provision in their home country.

Respondents from the higher education sector more generally questioned whether automatic enrolment is appropriate for examination board examiners. Academic examiners have to have a relevant academic qualification. Respondents said that most examiners are serving teachers with a main pensionable employment or retired teachers. They are usually members of, or in receipt of a pension from a qualifying scheme and work for the examination Boards for a limited period once or twice a year. Nevertheless, one Board has reported a high take up. Of the examiners they automatically enrolled, 75 percent had stayed in.

Government response

The Government has had considerable engagement with the film and television industry and workers in this traditionally under-pensioned industry are in scope if they have worker status. It is not appropriate to make exceptions for employers or employments by size or by sector.

International research fellows and academics on secondment from overseas are likely to be covered by the Pensions Regulators existing guidance on secondees and may not be within scope of the Pensions Act 2008. We are also aware of fixed term appointments funded by grants from industry or charities which are contracts of employment in their own right. We are not minded to create an exception to override the relevant consideration that the employer has to make on the facts of each case – whether the person is ordinarily working in the UK.

The argument presented to us that examiners are all well qualified teachers who have a substantial accrual in the Teachers Pension Scheme in their main occupation does not as a blanket assertion seem credible. Any secondary employer is unlikely to know about the person's financial circumstances and anyone with a subsidiary occupation has a right to an employer contribution if they qualify for automatic enrolment or opt in. Anyone who does not want the extra money from the second employer's contributions or, for whatever reason does not want to accrue further pension saving may opt out.

Corporate and group restructuring

What the consultation responses said

A specialist in outsourced pension administration suggested that workers transferred between companies within a group should be treated as in continuing employment with the same employer for the purposes of automatic enrolment. Clients acting as a corporate group could apply solutions across the group to keep costs down. This may include bringing forward staging dates to create a common staging date to produce efficiencies and a more coherent offer for a group's workforce and allowing a previous opt out to stand.

Government response

Our considered view is that it is not appropriate to address corporate or group transfers or restructuring as an exceptions issue.

Annex: Respondents to the technical consultation

ABI
Aegon
Alexander Forbes Offshore
Allen & Overy LLP
Altus Ltd
Aon Hewitt
Aquilaheywood
Asda Stores Ltd
Association of Accounting Technician
Association of Consulting Actuaries
Association of Convenience Stores
Association of Pension Lawyers
Association of School and College leaders
Aviva
B&CE Benefit Schemes
Buck Consultants
Cambridge Assessment
Capita
Ceridian UK
CIPP & IReeN
Coats plc
Compass Group
Council for the Curriculum, Examinations and Assessment
Debenhams
Department of Health
Devon County Council
Endemol UK Limited
Eversheds LLP
Fidelity Worldwide Investment
Friends Life
Greater Manchester Pension Fund
Greggs plc
Hampshire County Council
Hargreaves Lansdown
Herbert Smith Freehills.
Hymans Robertson
ICAEW
Johnson Fleming
JLT Benefit Solutions
Kent County Council
Kingfisher plc
Legal & General
Lewis Silkin
Liverpool John Moores University
Local Government Association

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Lorica Employee Benefits
Marks and Spencer
Mercer
National Association of Pension Funds
Nationwide Building Society
NEST
NHS Tayside (Payroll Managers Group)
Pact
Pegasus Software
PricewaterhouseCoopers
R&A Group Services Limited
Renfrewshire Council
Royal Devon and Exeter NHS Foundation Trust
Sackers
Safe Computing Ltd
Scottish Life
Scottish Qualifications Authority
Scottish Water
South Lanarkshire Council
Standard Life
Superannuation Arrangements of the University of London
Tesco
The Association of School and College Leaders
The Pensions Trust
The Society of Pension Consultants
Tax Incentivised Savings Association (TISA)
Towers Watson
Transport for London Pension Fund
TUC
Universities and Colleges Employers Association
Universities Superannuation Scheme Limited
University of Cambridge
Vale of Glamorgan Council
Wakefield College
West Somerset Council
Wragge & Co
Zurich Insurance

There were two responses from private individuals

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