



HM Treasury

The Fair Deal policy: response to further consultation

October 2013



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1

Introduction

1.1 'A Fair Deal for Staff Pensions' is a non-statutory policy applying to pension provision for public sector staff.¹ It required that where staff are compulsorily transferred out of central Government to an external provider, the new employer must provide a broadly comparable pension scheme for the transferred staff. The policy also requires previous employers to provide bulk transfer arrangements for staff transferring their public service pension benefits.

1.2 The interim report of the Independent Public Service Pensions Commission (IPSPC) found that current pension structures, combined with Fair Deal requirements, are a barrier to plurality of public service provision. The Government announced at the Spending Review 2010 that it would accept the suggestion to review the Fair Deal policy.

1.3 Following an initial consultation in 2011 the Government confirmed via a Written Ministerial Statement on 4 July 2012 that the overall approach to the Fair Deal would be retained, but that this would be delivered by offering access to the public service schemes for staff transferred under the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE). In November 2012 the Government published its response to the consultation which set out its position in more detail.

1.4 On publishing the response the Government announced a further consultation to explore views on how the reformed Fair Deal policy should apply to staff that have already been compulsorily transferred out of the public sector under Fair Deal. The consultation closed on 11 February 2013. There were 32 responses to this additional consultation from a broad range of organisations including representatives of employees and employers, actuaries and finance and legal professionals.

1.5 This document summarises responses to these further questions and sets out the Government's position on how pension protection should be provided for these staff.

1.6 The new Fair Deal guidance is being published alongside this document and comes into effect immediately, as described within the guidance.

¹ FAIR DEAL FOR STAFF PENSIONS: PROCUREMENT OF BULK TRANSFER AGREEMENTS AND RELATED ISSUES, Guidance Note by HM Treasury, June 2004, is available at: www.gov.uk/government/consultations/the-fair-deal-policy-treatment-of-pensions-on-compulsory-transfer-of-staff-from-the-public-sector

2

Reform of the Fair Deal policy for staff previously transferred out

2.1 To assist in the evaluation of options for reform of the Fair Deal policy the Government proposed that options should be considered against the following policy objectives.

- Delivering value for money for the taxpayer, so that the highest quality public services are achieved within available resources. This is particularly important at the current time.
- Providing an appropriate level of protection to public sector employees' pension provision when the services they deliver are outsourced. Retaining workforce engagement will help to ensure the effective delivery of public services, which requires the maintenance of key skills within the workforce.
- Removing barriers to plurality of public service provision. Opening public services up to competition is a key component of the Government's plans to improve quality and value for money in public service delivery.
- Allocating the costs and risks of pension provision appropriately. The Government must decide what costs and risks it is prepared to bear in the delivery of public services. These costs and risk are ultimately borne by the taxpayer.

2.2 The response to the first consultation proposed that when a contract involving staff transferred out under the previous Fair Deal policy is retendered, these policy objectives could be best delivered by allowing employers the option of providing employees with access to either a public service pension scheme or to a broadly comparable scheme.

2.3 The Government sought views on these options and asked the following additional questions:

Question 1

The Government welcomes views on the proposed application of the Fair Deal policy to staff previously transferred under the existing Fair Deal. In particular, the Government would welcome views on:

- 1 whether organisations employing these staff should be able to continue to offer a broadly comparable pension scheme to staff already transferred out under Fair Deal or;
- 2 whether access to the relevant public service pension scheme should be a term of business for potential bidders for retendered contracts (including incumbent providers); and
- 3 at what stage in the contracting process employers should be required to set out how they will offer pension provision for transferred staff – through access to the public service scheme or through offering a broadly comparable scheme.

Question 2

The Government welcomes views on whether there are any other situations that may arise when contracts covered by Fair Deal are retendered.

Meeting the objectives of Fair Deal for staff already transferred out

2.4 The majority of respondents, including employer organisations, trades unions and other staff representatives believed that transferring staff back to a public service scheme would, in the majority of cases, be the best way to meet the objectives of the Fair Deal policy for staff that have already been transferred out.

2.5 Most trades unions believed staff should be offered access to a public service scheme as a term of business when a contract is retendered. They suggested it would be in the best interests of staff as it would provide them with the security of a public service pension scheme for future pension accrual. It would also minimise any difference in treatment between staff previously transferred out under Fair Deal and staff transferred out under the new arrangements. Trades unions also believed it was the best way to provide a level playing field for all contractors by removing pensions as a factor in competition for public sector contracts. Some trades unions also believed that it may be preferable in a minority of cases to allow employers to continue to provide their own schemes where these were of a sufficient quality.

2.6 Most employer organisations believed that employers with staff transferred out under the previous Fair Deal policy should have the flexibility to be able to continue to provide broadly comparable schemes when a contract is retendered. They believed that there could be circumstances where the potential costs involved in staff exits from an existing broadly comparable scheme on a retender might outweigh the benefits to employers and contracting authorities of returning these staff to a public service scheme.

2.7 This may be because a transfer of staff out of an existing scheme may lead to the winding up of the scheme and a debt becoming payable from the employer to the scheme trustees to cover the value of any shortfall in the value of the assets and liabilities of the scheme at the point of closure. Employers that cease to have active members in multi-employer schemes as a result of a transfer of members to a public service scheme could also face the crystallisation of a significant debt. A debt would be payable by an existing employer to the scheme trustees to discharge its liabilities in relation to deferred pensions and pensions in payment.¹

2.8 Employer organisations also said there could be situations on a retender where the difference in the value of the bulk transfer of accrued pension rights offered by the existing scheme and the bulk transfer terms demanded by the receiving public service scheme could result in a shortfall. Under the 2004 Fair Deal guidance, the contracting authority may be required to meet this shortfall. They believed that if all employers were required to offer staff access to a public service scheme these potential costs could impact negatively on bids from existing employers. It was suggested that these costs could make it difficult, in some circumstances, for existing employers to compete with new bidders because new bidders would not need to reflect these costs in their bid.

¹ Section 75 of the Pensions Act 1995 requires that where the value at the applicable time of the assets of an occupational pension scheme is less than the amount at that time of the liabilities of the scheme, an amount equal to the difference shall be treated as a debt due from the employer to the trustees or managers of the scheme.

2.9 Another view was that if the Government was to allow only existing employers to continue to provide a broadly comparable scheme this could potentially place new bidders at a disadvantage. It was suggested that contracting authorities may find bids from existing providers more attractive compared to bids from new bidders if this meant that the costs involved with a bulk transfer of accrued pension rights to a public service scheme would be avoided.

2.10 Some respondents suggested that to ensure a level playing field between existing employers and new bidders, the Government should consider whether the option of providing a broadly comparable scheme should be available to new bidders as well as existing employers.

Other considerations when contracts involving staff with Fair Deal protection are retendered

2.11 In addition to providing views about the implications of winding up existing broadly comparable schemes, some employer organisations said there could be circumstances where employees who have been previously transferred out may have contractual pension rights limiting the options for transfer to a public service scheme.

2.12 They believed there could be specific contractual arrangements in place providing employees with access to a pension which is broadly comparable to the public service scheme on the terms available when the employees originally transferred out of the public sector. This could mean that some employees transferred out under the previous Fair Deal policy may have contractual rights to a final salary pension for all future service, which would bind existing employers.

Determining when and how to meet the objectives of Fair Deal

2.13 The majority of respondents felt that it would be important for employers to be clear from the outset of the retendering process how they intend to meet the requirements of the Fair Deal policy. It was suggested this would assist both the bidder and the contracting authority to assess the costs of pension provision as part of the tendering process. It was also suggested it would be in the best interests of employees as it would provide them with greater certainty about future pension provision.

2.14 Another view was that employers should provide an initial indication of how they propose to meet the requirements but that they should not need to set out the detail until the contractual negotiation stage. It was suggested this would enable them to conduct appropriate actuarial assessments of the costs of different options.

2.15 Respondents said it was important in setting out how the requirements of the Fair Deal policy would be met that statutory consultation requirements with employees on changes in pension arrangements could be fulfilled.

Government response

2.16 The Government is grateful to respondents for their views on these questions. These have been taken into account by the Government in determining its approach to reform of the Fair Deal policy for staff previously transferred out under existing Fair Deal when an existing contract is retendered.

2.17 The Government agrees with respondents that when a contract is retendered, in the vast majority of cases, transferring staff back to a public service scheme is the best way to meet the objectives of reform. The Government has considered views about the potential costs involved in some retendering exercises of requiring staff to be offered access to a public service scheme.

Having considered these views the Government believes that it should focus on the long term objective of achieving better value for money in the delivery of public services. In the Government's view removing the costs and risks of defined benefits pension provision from independent providers of public services is the best way to achieve this objective.

2.18 The Government believes these longer term objectives are best achieved by a presumption that when a contract is retendered staff should be transferred back to a public service scheme for future accrual. The Government has concluded that the immediate costs involved with moving staff from a broadly comparable scheme to a public service scheme for future accrual should not be a reason to avoid moving staff when a contract is retendered.

2.19 However, the Government also recognises that contracting authorities must comply with their obligations under procurement law to ensure equal treatment between bidders competing for public sector contracts. In some circumstances, depending upon the exit terms agreed when the existing contract was negotiated, requiring the return of staff to a public service scheme could mean that bids from an incumbent employer would include costs which may not be reflected in bids from a prospective new employer bidding for the same contract.

2.20 The Government believes that in situations such as this, if a contracting authority would be unable to comply with its legal obligations to treat bidders equally if it required the existing employer to provide access to a public service pension scheme, then the existing employer should have the option of providing staff with access to either a public service pension scheme or to a broadly comparable pension scheme.

2.21 Furthermore, the Government has also determined that there could be exceptional circumstances in which allowing an incumbent bidder to provide access to either a public service scheme or to a broadly comparable scheme could mean that the contracting authority is unable to comply with its obligations under procurement law to treat all bidders equally. While the Government expects these situations to be rare, it has decided that should they arise, in order to comply with procurement law, contracting authorities may need to provide that all bidders compete on the basis of providing a broadly comparable scheme.

2.22 In circumstances where procurement law determines that the incumbent, or both the incumbent and new bidders, should provide access to a broadly comparable scheme, the Government's preference is that the broadly comparable scheme should be broadly comparable to the relevant public service pension scheme. In the future, this may mean that the scheme should be broadly comparable to a Career Average Revalued Earnings (CARE) scheme, and where this is the case, the broadly comparable scheme should also be a CARE scheme. This will ensure that, as far as possible, employees who transferred out of the public sector in the past will be treated in the same way as their counterparts who have remained in the public sector throughout.

2.23 There may also be circumstances in which the contracting authority is able to ensure a level playing field for all bidders while requiring access to a public service scheme, but an incumbent employer still has contractual obligations to staff which require that employer to continue providing access to a scheme broadly comparable to the scheme in place when those staff first left the public sector. In these circumstances, the incumbent should seek to renegotiate these contracts to instead provide access to a public service pension scheme following the retender of the contract. If the incumbent is unable to secure a change in employee contracts, they may instead be required to provide continued access to a broadly comparable scheme.

2.24 When bidders do bid on the basis of providing a broadly comparable scheme, the contracting authority should make this clear at the beginning of the procurement process. Pensions should be dealt with as an integral part of the overall procurement exercise. This is in

the best interests of bidders and affected employees who will be provided with greater certainty about their future pension provision.

2.25 The Government believes the approach to retendering set out above is consistent with the objectives of reform of the Fair Deal policy. In the longer term it meets the aims of delivering value for money for the taxpayer and of opening public services to competition. The approach is also consistent with the aim of providing an appropriate level of pension protection to employees delivering public services.

2.26 The approach will ensure that whatever the specific circumstances of each retendering exercise, staff will continue to have access to a pension scheme which is at least as good as a relevant public service scheme. Further details on how the new policy will operate are set out in the revised Fair Deal guidance.

3

Access to public service schemes and bulk transfer arrangements

3.1 In responding to the first consultation on the Fair Deal policy the Government stated that where employees are either transferred back to a public service scheme or to a new provider's broadly comparable scheme, any accrued rights transferred from the existing broadly comparable scheme will be protected. This would include rights to the maintenance of a final salary link for any previous service accrued in the old final salary schemes.

3.2 A transfer to either a public service scheme or to a new provider's scheme will require a bulk transfer into the new pension scheme, unless the employee chooses to become a deferred member of the old scheme. The Government sought views on how bulk transfers should work.

3.3 Some retendering exercises will take place prior to implementation of the reforms to public service schemes in 2015. The Government thought it was also important to seek views on which schemes employees returning to a public service scheme should be able to access.

3.4 The Government asked the following additional questions:

Question 3

The Government welcomes views on which scheme employees returning before 2015 should be able to access. This could be the one they originally left, the contracting authority's currently open scheme, or the scheme most broadly comparable to the one they originally left.

Question 4

The Government welcomes views on how bulk transfers for employees covered by the existing Fair Deal will work when those contracts are retendered under the new policy.

Public service scheme for employees returning before 2015

3.5 Trades unions generally took the view that staff returning to a public service scheme should have a choice of the scheme they originally left on the terms available at the point of transfer, or the current open scheme. They believed it would be important for employees to be provided with advice on bulk transfer values so that they could make an informed decision as to which option would benefit them the most. Several trades unions suggested that staff should be returned to the scheme they left.

3.6 Other respondents, including employer organisations, provided a range of views. Some believed that employees should be provided with access to a scheme with similar terms to the scheme they participated in immediately before being transferred out, or to a comparable scheme where that scheme may be closed. These respondents thought this would make the bulk transfer process easier by ensuring the closest alignment between the benefit structures of the

transferring employer's scheme and the receiving public service scheme. They thought this would be the most straightforward approach for employees.

3.7 Another view expressed by some employer organisations was that employees should have access to the current open version of the scheme they left, or to the scheme to which they would have progressed had they never left the public sector. These respondents agreed with the principle set out in the consultation that it would be important that employees returning to a public service scheme should not be placed at an advantage compared with employees who had remained in the public sector.

3.8 Some respondents thought that where the public sector landscape has changed since the point of original transfer, the appropriate public service scheme to which employees should be transferred might not be the scheme they were in when they originally transferred from the public sector. They thought this should be taken into consideration in the approach to the Fair Deal policy.

Bulk transfers when contracts are retendered

3.9 Respondents had a range of views on how bulk transfers arrangements for employees should work when a contract is retendered.

3.10 Trades unions thought it would be important that employees retained the option to either transfer their accrued pension rights to a public service scheme or to leave their accrued rights in deferment with the existing employer scheme. They believed it was important that employees' accrued rights, including those linked to a final salary, should be fully protected. They also said that contracting authorities should meet the costs of bulk transfers including the cost of any actuarial work involved. They thought it was important that these costs should not be reflected in the terms offered to staff.

3.11 Some employer organisations suggested that the Government should consider removing the option for employees to be able to opt out of a bulk transfer and to leave their accrued pension rights in deferment. Their view was that it would be preferable if all accrued rights, including the deferred rights of former employees who transferred out when the contract was originally let and who subsequently left the employer and all pensioner liabilities, could be bulk transferred to the new scheme, potentially without employee consent. It was suggested that enabling bulk transfers in this way could mean that employers participating in multi-employer schemes would be able to avoid the debts that might otherwise crystallise. This would be because having transferred back all staff who participated in the original transfer they would not have any remaining liabilities to discharge.

3.12 Some employer organisations also thought the guidance needed to be clearer on how bulk transfers to either a public service scheme or to another provider's broadly comparable scheme would work.

3.13 Under the 2004 Fair Deal guidance contracting authorities are responsible for meeting additional costs in the event that the value of the bulk transfer, while sufficient to meet the terms of the initial bulk transfer into the existing scheme, is insufficient to cover the terms demanded by the scheme to which employees will transfer. Respondents agreed that it was important that this feature of the previous Fair Deal policy should be maintained for employees returning to the public service schemes.

3.14 However, some employer organisations considered that contracts let prior to publication of the 2004 guidance may not have made provision for onward bulk transfer arrangements. They thought it was important that the new guidance was clear on how transfers in these cases should be dealt with.

Government response

3.15 The Government is grateful to respondents for their views on these questions. These views have been considered in determining how bulk transfers will operate under the reformed Fair Deal policy.

3.16 The Government stated in the consultation that while it is important to maintain protection for those employees who have been transferred out under the existing Fair Deal policy, it is also important to avoid the unfairness that would result if they were better off for being transferred out.

3.17 For employees with Fair Deal protection returning to a public service scheme the Government believes that it is fair that these staff should be offered access to the pension arrangements that are as close as possible to those they would have had access to had they never transferred out of the public sector. This means these employees will have access to the current open version of the scheme they left, with access to the benefits currently offered to members of that scheme who have remained in the public sector throughout.

3.18 Where the scheme these employees left is closed to future accrual, it could also mean returning employees having access to the scheme to which they would have progressed had they never left the public sector. This will ensure that, as far as possible, these employees are treated equally with their counterparts who never left the public sector.

3.19 Like their counterparts who had never transferred out, pension arrangements for employees who transfer back to a public service scheme before 2015 will also be subject to the reforms to the public service schemes in 2015.

3.20 Under existing legislation a scheme may provide for a member's accrued rights to be transferred to another occupational pension scheme, provided that the member consents.¹ The Government believes that when a contract involving staff with Fair Deal protection is retendered and those employees are transferred to a new scheme, it is important that they will continue to have the option to defer any accrued pension rights. Consent will continue to be needed for a transfer of a member's accrued rights. These rights will not therefore be automatically transferred to the new scheme.

3.21 The Government acknowledges that some contracts, particularly those negotiated prior to publication of the 2004 Fair Deal guidance, may not include provision for onward bulk transfer arrangements. Where a bulk transfer does take place in the absence of such provision the Government believes that agreement of exit terms from an existing broadly comparable scheme should be a matter for the employer and contracting authority to determine. This is reflected in the new guidance.

¹ Section 73 of the Pensions Schemes Act 1993.

4

Impact on people with protected characteristics

4.1 The Equality Act requires the Government to consider the impacts of its policy decisions on people with protected characteristics before making a final decision.

4.2 The Government therefore sought views on the potential impact of the new approach to the Fair Deal policy for previously transferred staff on employees with protected characteristics. The consultation asked the following question:

Question 5

The Government welcomes views on whether the proposed approach to the Fair Deal policy for employees that have already been transferred out of the public sector will have differential impacts on people with protected characteristics.

4.3 Comments were received in relation to six of the nine protected characteristics under the legislation – race, disability, gender, age, gender reassignment and pregnancy and maternity.

4.4 No respondents provided detailed data of numbers of people with protected characteristics expected to be impacted by the new policy. However anecdotal information provided by respondents suggested that because outsourcing of public service contracts has to date mainly focused on ancillary and support services, it is likely that there will be a high number of lower paid staff amongst the affected workforce. Respondents also suggested that outsourced service providers have traditionally employed large numbers of women and black and ethnic minority staff. Some respondents suggested that older people are likely to be represented in high numbers in the outsourced workforce as those transferred out will have been in public service for longer.

Government response

4.5 The Government does not hold data centrally on the characteristics of staff transferred out of the public sector under the previous Fair Deal policy. However the Government accepts that the previous policy is likely to have had a greater effect on people with protected characteristics, as those groups may be more likely to be represented amongst staff transferred out of the public sector.

4.6 Continuing to allow independent providers to provide for future pension accrual via broadly comparable schemes, rather than requiring access to the public service pension schemes, could therefore mean people with protected characteristics may be less likely to have access to a public service pension scheme. However, all staff covered by the Fair Deal policy will continue to have access to a pension which is at least as good as a public service scheme, whether this is via access to a public service scheme or to a broadly comparable scheme. Therefore the Government does not believe that the decision to retain broadly comparable schemes in some limited circumstances will have a disproportionate effect on any protected group.

5

Further comments on the guidance

5.1 The Government asked respondents whether they had any additional comments on the draft guidance or other views on the policy. The consultation asked the following additional question:

Question 6

The Government welcomes views on this draft guidance and suggestions for further areas that need to be covered.

5.2 Respondents provided a range of additional views on the Government's approach to the Fair Deal policy. A number of key themes emerged.

5.3 Trades unions asked the Government to consider whether the scope of the policy should be limited to transfers which engage the TUPE regulations. In particular, they noted that the move to develop new models for public service delivery, including public service mutuals, may mean that future non-voluntary transfers out of the public sector do not engage these regulations. They asked whether the Government should consider extending the scope of the policy to cover these scenarios.

5.4 Respondents also thought it was important that the new guidance was clear about which staff are covered by the Fair Deal policy. A number of respondents also questioned the rationale for excluding transfers from local government, and other best value authorities, from the scope of the new approach to the Fair Deal policy. Respondents suggested that the guidance should be clearer about how the new approach to the Fair Deal policy should interact with the responsibilities on local authorities to ensure appropriate pension protection when staff are transferred from local government to independent providers.

5.5 Respondents also suggested that the guidance should consider a range of scenarios outside the context of a retender in which it may be appropriate to offer access to a public service scheme. Such scenarios, it was suggested, may include a change in ownership of a company providing a public service or the transfer of employees to a sub-contractor. Respondents suggested that consideration would need to be given to the most appropriate approach to pension arrangements in such circumstances.

5.6 Respondents noted that to date the Fair Deal policy has not applied to retenders of contracts originally let prior to publication of the 1999 Fair Deal guidance. They sought clarity on the application of the new guidance to these contracts.

5.7 A large number of respondents sought greater clarity with regard to the calculation of employer contribution rates. Trades unions believed that it was important that the mechanism for determining employer contribution rates provided certainty that there was no risk of employers under-contributing, which they suggested could have a detrimental impact on employees. Employer organisations believed that a clear mechanism for determining contribution rates was important to provide cost certainty if prospective employers were not to be deterred from bidding for contracts.

5.8 A number of respondents suggested that the guidance needed to be clear on the circumstances in which staff transferred out of the public sector remain eligible for Fair Deal protection and specifically the circumstances in which, having been transferred to an independent contractor, they might stop being eligible for membership of a public service scheme.

Government Response

5.9 The Government is grateful to respondents for their further views and suggestions. These have been taken into consideration in preparing the new guidance which sets out the new Fair Deal policy.

5.10 The Government has noted the concern of trades unions that the Fair Deal policy should apply in some circumstances in which the TUPE regulations are not engaged. The Government considers that staff non-voluntarily transferred to new models of public service delivery should continue to enjoy pension protection, even if the transfer of staff does not engage TUPE. For this reason, the Fair Deal policy will apply to both TUPE transfers and non-voluntary transfers of staff to public service mutuals or to other new models of public service delivery.

5.11 The new guidance makes clear that the Fair Deal policy applies directly to central government departments, agencies, the NHS, maintained schools¹ (including academies) and any other parts of the public sector under the control of Government ministers, where staff are eligible to be members of a public service pension scheme. Transfers from local authorities and other best value authorities are outside the scope of the Fair Deal guidance – alternative arrangements exist in respect of those bodies. The Department for Communities and Local Government is considering how the new Fair Deal principles can be implemented for local government and the implications for the Local Government Pension Scheme.

5.12 The Government acknowledges views that there may be circumstances other than the retender of an existing contract where consideration could be given to providing employees with access to a public service scheme. The Government believes that should such circumstances arise, decisions should be made on a case by case basis taking into consideration existing contractual arrangements and any requirements for consultation with those affected.

5.13 When contracts originally let prior to publication of the 1999 guidance are retendered the Government's preference is that, where the approach taken was equivalent to the Fair Deal policy, the new guidance should be used by contracting authorities when these contracts are retendered. Whether to apply the new guidance to these earlier contracts will continue to be a matter for the contracting authority and the authority responsible for the pension scheme.

5.14 All employers in the scheme will generally pay the same contribution rate with some provision for additional payments in particular circumstances. Individual public service pension schemes will provide more detail on specific arrangements for each scheme.

5.15 The new guidance sets out the circumstances in which staff, having transferred from the public sector to an external provider, will remain eligible for protection under the Fair Deal policy. More details will be set out in the guidance applicable to each individual scheme.

¹ Except and to the extent that a direction issued under sections 101 and 102 of the Local Government Act 2003 applies to a school which is maintained by a best value authority. Where such a direction applies, transferred staff will instead be subject to the alternative arrangements set out in that direction.



Consultation respondents

A.1 The Government is grateful to the following respondents for their contributions to this further consultation:

Aon Hewitt
Association of Consulting Actuaries
Association of Pension Lawyers
Barnett Waddingham
Capgemini
Dickinson Dees
DWF
Eversheds
FDA
Field Fisher Waterhouse
Fujitsu
GMB
Hymans Robertson
Kent County Council
Mercer
NASUWT – National Association of Schoolmasters Union of Women Teachers
NIPSA – Northern Ireland Public Service Alliance
NUT – National Union of Teachers
Prospect
Prudential UK
Public and Commercial Services Union
Sackers
Shoosmiths
SPC
The Business Services Association
The Royal College of Midwives
Thompsons Solicitors
TUC – Trades Union Congress
UCATT – Union of Construction, Allied Trades and Technicians
UNISON
Unite
Wragge & Co

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