

P/CPO/HR

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Mr M Woodall
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Dear Mr Kirk

The Local Government Pension Scheme (Amendments) (Number 2) Regulations 2004
- Consultation Draft

Further to my previous response to the proposed Regulations, I would wish to add further comments on the Transitional Provisions and Savings contained in those Draft Regulations.

In the case of a member who is between 50 and 52 on 1 April 2005, whilst being protected for early retirement on redundancy grounds before reaching age 55, should they continue to work until age 60 and leave on a voluntary basis they will suffer a considerable actuarial reduction on all service post 1 April 2005 (example 4 from your Web Site).

Conversely a member aged 52 or above on 1 April 2005 who continues to work until age 60, satisfies the "85 year rule" on 1 April 2013 and leaves voluntarily will not suffer any actuarial reduction on pre 1 April 2013 membership.

This appears to be anomalous because in the first example the member not being 60 years old means he cannot satisfy the "85 year rule" on 1 April 2013. In this case although the member may have satisfied the current 85 year rule, the fact that he is not 60 as the current proposals prohibit him from having unreduced benefits from age 60.

Whilst accepting that there will be winners and losers with any cut-off date, it appears to us that a member afforded protection at age 50 would expect similar protection to continue until age 60 and a date of 1 April 2015 would seem more appropriate as well as simplifying the administration processes.

I should be grateful if you would consider these comments in conjunction with my previous submission.

Yours sincerely

Mike Woodall
Chief Pensions Officer

cfi: Brian Bailey Director for Finance and Physical Resources
Councillor T Singh Chair - Superannuation Committee
Councillor F Docherty Vice-Chair - Superannuation Committee
Mark Crutchley