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Scottish Teachers' Superannuation Scheme consultees

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20 December 2013

Dear Colleague

Proposals for implementation of the reformed Scottish Teachers' Pension Scheme with effect from 1 April 2015

I enclose for any comments that you may have the draft Teachers' Pension Scheme (Scotland) Regulations 2014, which make provision for the new Scottish Teachers' Pension Scheme to be implemented with effect from 1 April 2015. I would be grateful if you would distribute this letter and attachments as widely as possible.

The Framework Document setting out the terms of the new scheme and a series of Frequently Asked Questions (FAQs) are available on the SPPA's website:

http://www.sppa.gov.uk/index.php?option=com_content&view=article&id=883&Itemid=1574

The following documents are attached:

- Annex A: Background to the proposed changes
- Annex B: Commentary on the regulations
- Annex C: Link to the draft Teachers' Pension Scheme (Scotland) Regulations 2014
- Annex D: Consultation Response Form

You can respond to this consultation on line via the following link:

http://www.sppa.gov.uk/index.php?option=com_wrapper&view=wrapper&Itemid=1573



Alternatively you may complete the Consultation Response Form attached at Annex D which can be submitted electronically to stsspensionreform@scotland.gsi.gov.uk or by post to the following address:

STSS Consultation (2015 Reform)
SPPA Policy
7 Tweedside Park
Tweedbank
Galashiels
TD1 3TE

A printable Consultation Response Form is available via the following link:

http://www.sppa.gov.uk/Documents/STSS/STSS%20Useful%20Resources/Consultations/2013/STSS_%20printable%20response%20form_draft%20regulations%202014.docx

The consultation will close on **16 February 2014** and we ask that anyone wishing to respond does so by then.

A copy of the consultation documentation is also available on the Agency's website at:

http://www.sppa.gov.uk/index.php?option=com_content&view=article&id=714&Itemid=546

We intend to publish a summary of consultation responses in due course and would like to be able to include any response you make in that summary. However, if you ask us not to publish your response to this consultation, we will regard it as confidential, and we will treat it accordingly.

Respondents should also be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and will have to respond appropriately to any relevant request made to the SPPA under that Act for information concerning this consultation exercise.

Yours faithfully



Chad Dawtry
Director of Policy

Copies to:

COSLA

Scottish Local Authorities

Colleges of Further and Higher Education

Colleges Scotland

Scottish Further Education Unit

Higher Education Establishments

Scottish Independent Schools

Scottish Council for Independent Schools

Workers Educational Association

Scottish Qualifications Authority

Educational Institute of Scotland

Scottish Secondary Teachers' Association

VOICE the union

National Association of Schoolmasters/Union of Women Teachers

Association of Headteachers and Deputies in Scotland

School Leaders Scotland

University and College Union

Association of Teachers and Lecturers

Scottish Government

HM Treasury

Government Actuary's Department

Department for Education, England & Wales

Department for Education, Northern Ireland

NHS Pensions Agency

Department of Communities and Local Government

Department for Work and Pensions

Ministry of Defence

Audit Scotland

General Teaching Council for Scotland

Scottish Funding Council

Scottish Council for Research in Education

Women's National Commission



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BACKGROUND

In 2010, the UK Government gave a commitment to review the long-term affordability and sustainability of public service pension schemes. Although Scottish Ministers have executively devolved powers to make and amend regulations covering the Scottish Teachers' Superannuation Scheme (STSS) overall occupational pensions policy remains reserved to Westminster.

Lord Hutton of Furness was commissioned to conduct a fundamental structural review of public service pension provision and to make recommendations on arrangements that are sustainable and affordable in the long-term, whilst at the same time, remaining fair to the workforce and the taxpayer.

In March 2011, Lord Hutton published his final report on the future of public service pensions and his recommendations were considered by the UK Government. These were subsequently reflected in the Public Service Pensions Act 2013 which provides:

- the end to current final salary pension schemes
- establishing a link between normal pension age and state pension age
- improvements to public sector scheme governance arrangements
- that the reforms must be implemented by April 2015
- protection against the reforms for scheme members close to retirement

The provisions of the Act must be applied to the main public service schemes in Scotland.

In March 2012, Michael Russell MSP, Cabinet Secretary for Education and Lifelong Learning, announced that the Scottish Teachers' Pension Scheme Negotiating Group (STPSNG) would be set up to take forward reform of the STSS. This Group comprised representatives of teachers' unions, teachers' employers, the Scottish Public Pensions Agency and was chaired by the Scottish Government Education Directorate. The STPSNG held its first meeting in April 2012 and met 14 times during 2012/2013.

The STPSNG negotiations commenced using as a benchmark the reformed scheme for the Teachers' Pensions Scheme for England and Wales announced by the Department for Education on 9 March 2012. The negotiations were also subject to the constraints on scheme design arising from the development and introduction of the Public Service Pensions Act 2013. Whilst a number of issues were discussed the key issue centred on reducing the impact of the requirement for schemes to equalise Normal



Pension Age with State Pension Age. Negotiations attempted to provide improved Early Retirement Factors (ERF) from age 65 to mitigate the impact of later retirement ages whilst still remaining within the set cost envelope for the scheme. It remains a requirement that HM Treasury (HMT) consent must be provided when preparing the scheme regulations so it was necessary to reach agreement with HMT on any proposed reduction in the accrual rate. Despite lengthy negotiations it was not possible to reach an agreement on a revised accrual rate appropriate for the improved ERFs, and the rate proposed by HMT would have left the majority of scheme members in a worse position when compared to the benchmark scheme. It was therefore concluded in December 2013 that it was not possible to achieve a distinctly Scottish specific teachers' pension scheme and that the benchmark scheme design should be applied in Scotland.



COMMENTARY ON THE SCOTTISH TEACHERS' PENSIONS REGULATIONS 2014

PART 1: PRELIMINARY

Part 1 of the Scottish Teachers' Pension Regulations 2014 establishes the name of both the regulations and the scheme and determines the extent of the regulations. It also provides for commencement of the governance section (in particular arrangements for the STPS Pension Board – see below for more details) at an earlier date than the rest of the scheme and sets out the definitions used throughout the document.

PART 2: GOVERNANCE

Part 2 establishes the Scottish Ministers as the scheme manager for this scheme and the final salary scheme. It also provides the legal basis for the Scottish Teachers' Pension Scheme Pension Board and the Scottish Teachers' Pension Scheme Advisory Board (which are being established to provide assurance and assistance to the scheme manager in ensuring the effective administration and running of the Scheme).

PART 3: SCHEME MEMBERSHIP

Part 3 of these regulations is split into 4 chapters each covering different aspects of scheme membership.

Chapter 1 provides definitions used throughout this part.

Chapter 2 provides criteria for general scheme membership. In particular this chapter defines dual membership as a scheme member who has more than one status in the scheme. A scheme member who has had a break in service of more than 5 years and then returns to the reformed scheme, for example, would be a deferred member in respect of their service before the break and an active member in respect of service after the break.

Chapter 3 defines pensionable service in the reformed scheme and includes details of automatic enrolment under the Occupational and Personal Pension Schemes (Automatic Enrolment) Regulations 2010.

Section 2 of Chapter 3 deals specifically with those scheme members who are called out, or re-called, for permanent service in Her Majesty's armed forces. This provision is unchanged from the Teachers' Superannuation (Scotland) Regulations 2005.



Sections 3 and 4 provide for scheme members to opt out of, and in to, the scheme before and after automatic enrolment takes effect.

The focus of Chapter 4 is on pensionable earnings. This is the salary, and other payments, used to determine the amount of pension a scheme member will accrue each year as well as the contributions to be paid. Provision is made for residential emoluments to be treated as a benefit in kind. Overtime payments will form part of pensionable earnings in the reformed scheme and the draft regulations cover that.

PART 4: PENSION ACCOUNTS

Part 4 of the Regulations sets out how benefits are recorded for different member types eg active, deferred and pensioner members, and the relevant indexation to be applied in each case. It also establishes provisions for recording and indexing additional pension and extra pension accrued through faster accrual.

Chapter 1 explains that indexation will be applied on a pro rata basis in circumstances where the scheme member leaves the scheme during the financial year. Active member benefits will be indexed at 1.6% above the rate specified in a Treasury Order. Deferred benefits and pensions in payment will be indexed in line with the Pensions Increase Act.

Chapter 2 sets out the various elements that go to make up a scheme member's accrued pension. This includes the value of pension earned each year, the value of any additional pension or faster accrual election and the indexation that applies to those. Definitions of each element are provided throughout part 4.

Chapter 3 requires the scheme manager to establish an account to record the benefits accrued or purchased by each scheme member and specifies that each scheme member may have more than one account. This chapter also provides that a scheme member's accounts must be closed if the accrued benefits are transferred to another scheme or, if contributions are repaid.

Chapter 4 establishes that an account will be set up for each active member. It confirms the elements that must be included in the active account for each financial year. This includes the standard earned pension, which accrues at 1/57th of pensionable earnings and the value of any pension accrued through faster accrual. Transferred pension will also be held in the active member's account. The basis on which the opening balance for each year of active service will be calculated is also set out here.



Chapter 5 refers to the establishment and administration of an additional pension account. This account will be used for all additional pension elections made. The amount placed in the account when an election is made will be the additional amount of pension the member has decided to purchase (eg £250, £500 etc). Indexation will be added each year thereafter, in line with the Pensions Increase legislation. It should be noted, however, that an adjustment to the amount of additional pension payable will be made where the member is purchasing the additional pension by instalments and does not complete the payment of instalments. There are exceptions for where the member retires due to ill health and receives ill health benefits from the scheme, or where the member dies during the instalment period when any beneficiaries' pension applicable will be based on the full amount.

Chapter 6 provides for the establishment of a deferred member's account when an active member's account is closed, and for the on-going administration of the account. In particular, it refers to a scheme member who returns to pensionable service after a break of not more than 5 years; here the scheme member's benefits return to the active account and are re-valued in line with the annual Treasury Order plus 1.6% (this includes any relevant revaluation for the period whilst the scheme member was on the break). This chapter also covers where the break is more than 5 years, the previous account (ie pension earned) remains deferred and an active account is opened in respect of further service.

Chapter 7 provides for the establishment of a pensioner member's account where benefits become payable, including for phased retirement members. Where a scheme member draws benefits in full any active and deferred account is closed, together with any additional pension account, and a pensioner account is opened. Adjustments are made to the account in relation to actuarial adjustment and lump sum commutation. Where a scheme member draws part of their benefits (phased retirement) the relevant amount of benefits is transferred from their active or deferred account to the pension account and the active or deferred account is adjusted accordingly.

Chapter 8 covers the establishment of an account or accounts for a pension credit member. It provides that a pension credit member will have a separate account in respect of each pension debit member.

PART 5: RETIREMENT BENEFITS FOR TEACHERS

This section of the regulations delivers the basis for a scheme member's entitlement to the different types of pension, the date any such pension would be payable from and the method for calculating the annual rate of pension. Please note that there is no automatic lump sum payable but members can



commute up to 25% of their pension pot into a lump sum, in line with the current scheme (part 8, chapter 3 applies).

Chapter 1 provides definitions to be used throughout this part and confirms that qualification for pension benefits remains as 2 years qualifying service. It also introduces a further element to qualification in that, for transitional members, any service in the existing scheme will count towards qualification service in the reformed scheme.

Chapter 2 relates to benefits payable at or after normal pension age (NPA). A scheme member who qualifies for retirement benefits and leaves all pensionable service on or after reaching their NPA will become entitled to their pension. This chapter also confirms that a pension taken after NPA will be actuarially adjusted.

Chapter 4 sets out the provisions for premature retirement in line with those provided for in the existing scheme. The main provisions are set out in the Teachers (Compensation for Redundancy and Premature Retirement) Regulations 1996 and, should amendments to these regulations be required, we will consult further in 2014.

Chapter 5 provides for a scheme member who has reached at least 55 years of age to elect to receive pension benefits before reaching NPA. Such an election takes effect where the scheme member has left all eligible employment. Pension benefits taken before the member reaches NPA will be actuarially adjusted. Where a member is retiring early, the adjustment will be in line with the new flexibility whereby for members with normal pension ages (NPA) of over 65, up to three years of actuarial adjustment (reduction in this case) will be at the lower rate of 3% (typical average is currently 5%). A member with an NPA of 66, for example, would have the final year adjustment calculated at 3%, a member with an NPA of 67 would have the final two years calculated at 3% per year, and a member with an NPA of 68 or over the final three years calculated at 3% per year.

Chapter 6 sets out the provisions for an ill-health pension and total incapacity benefits. Section 2 establishes the conditions to be met by active and deferred members in relation to an ill health pension and the annual rate of such a pension. Section 3 confirms the conditions to qualify for a total incapacity benefit to be paid along with an ill health pension, and the method for calculating the value of any total incapacity benefit. Both sections confirm the circumstances where an ill health pension or total incapacity pension will cease.



Chapter 7 provides that a scheme member who has become seriously ill before qualifying for retirement benefits may be entitled to a short service serious ill health grant.

Chapter 8 explains that a scheme member who enters post benefit service (i.e. re-enters pensionable service after retiring and drawing benefits previously built up in the scheme) but subsequently leaves before qualifying for benefits is not entitled to a refund of contributions under HMRC rules. This chapter provides that in such circumstances the scheme member will receive a short service annuity.

Chapter 3 sets out the conditions, under which a scheme member can elect to take phased retirement. A scheme member can continue to take up to 75% of their accrued benefits and continue to work in eligible employment. This option is available on a maximum of three occasions but on no more than two occasions before the scheme member reaches 60 years of age. This chapter also confirms that a phased retirement will cease should the scheme member's circumstances change within the first 12 months such that the scheme member no longer meets the phased retirement conditions.

N.B. Schedule 5 provides more details on how benefits are calculated and paid for those members with both final salary and reformed scheme service.

PART 6: SURVIVOR'S BENEFITS

This part sets out the pensions and lump sums that are payable in the event of a scheme member's death. The level or type of pension or lump sum varies, subject to a number of factors, such as whether the scheme member is still contributing to the scheme and whether there are dependants. In line with the existing scheme, there is no qualification period for death grants, although scheme members will need to complete two years' qualifying service before their dependants are eligible for pension benefits.

Chapter 1 contains definitions that clarify whether a scheme member is active, deferred or a pensioner member at the date of death. This chapter also includes definitions of surviving adult, surviving nominated partner and surviving beneficiary.

Chapter 2 explains who a member can nominate to receive a death grant or survivor's pension on the member's death.

Chapter 3 sets out who a death grant should be paid to and provides the calculation of the death grant depending on whether the member was active, deferred or a pensioner member at the date of death.



Chapter 4 provides for the calculation of the long and short term rates of a surviving adult pension.

PART 7: BENEFITS FOR PENSION CREDIT MEMBERS

This part provides that a person who is entitled to a pension as a result of a pension sharing order is a pension credit member. A pension credit member may apply for a pension at any time after reaching 55 years of age. A pension put into payment before the pension credit member reaches their NPA in the scheme would be actuarially adjusted. A death grant and survivor's pension are payable to a pension credit member's surviving nominated beneficiary.

PART 8: PAYMENT OF BENEFITS

Chapter 1 sets out the requirement for a scheme member to make a written application to the scheme manager in order to receive benefits.

Chapter 2 provides for benefits to be paid either monthly or quarterly and for the scheme member to request the frequency as part of the application.

Chapter 3 is concerned with the payment of lump sums in circumstances such as where the member chooses to commute part of pension to lump sum, serious ill health commutation and small pension commutation. This chapter sets out the conditions that must be met if a lump sum is to be paid, and the methods for calculating the value of the lump sum payments.

Chapter 4 provides powers allowing the scheme manager to request evidence from a scheme member who is in receipt of benefits that they continue to be eligible for those benefits. Should the scheme member not provide evidence as requested, or the scheme manager determines the scheme member was not entitled, or is no longer entitled to benefits the scheme manager may cease and recover payments.

Chapter 5 includes a number of administrative provisions including: interest paid on the late payment of benefits; payments to a child or person who is unable to manage financial affairs; forfeiture of benefits in certain cases; and reduction in benefits following the scheme paying a charge in relation to annual and lifetime allowances. This chapter also confirms that benefits accrued under this scheme cannot be assigned to another person.

PART 9: CONTRIBUTIONS

Contributions are payable by scheme members and employers of scheme members. Part 9 provides the basis on which contributions are payable.



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N.B. The level of contributions payable will be determined in line with the arrangements for scheme valuations. Those arrangements are yet to be finalised and will be the subject of further regulation before the reformed scheme comes into effect, see notes on part 10 and Schedule 4 below for more information.

Chapters 1 and 2 are concerned with payment of contributions in relation to scheme members and those called out for permanent service in Her Majesty's armed forces. Contributions for scheme members are determined under Schedule 3 (see below).

Chapter 3 explains that a scheme member who leaves all pensionable service before qualifying for retirement benefits is entitled to apply for a repayment of contributions. A scheme member in post benefit service is not entitled to a refund of contributions. This chapter also provides the method of calculating the value of contributions to be repaid.

Chapter 4 confirms that the employer of a scheme member is to pay contributions at a percentage rate of the scheme member's pensionable earnings. The rate is determined under schedule 3 (see below)

The employer of a scheme member is required under chapter 5 to deduct the appropriate member contributions from the scheme member's salary each month and pay that, together with the relevant employer's contribution, to the scheme manager. This chapter also provides for a scheme member to pay to the scheme manager any amount of contributions that are not deducted by the employer. Should such an amount not be paid by the scheme member, the scheme manager may deduct an appropriate value from the scheme member's benefits.

PART 10: ACTUARIAL VALUATIONS AND EMPLOYER COST CAP

This part will include details of how the STPS will be valued, and how the cost cap will work. HM Treasury are in the process of finalising the overall arrangements for scheme valuations. We expect to consult further on the details for STPS valuations once the overall guidance is determined, and to lay appropriate regulations before the Scottish Parliament in 2014. The draft regulations include a placeholder for this issue.

PART 11: TRANSFERS

This part sets out the arrangements governing when a member is entitled to a transfer value payment. (Please also refer to Schedule 2 for further information on transfers.)

PART 12: MISCELLANEOUS AND SUPPLEMENTAL

This part provides for supplemental processes, such as the payment of transfer values. It also requires the employer of a scheme member to retain, and make available specified information.

SCHEDULE 1: ELIGIBLE EMPLOYMENT

Schedule 1 sets out the employments under which a person is eligible to become an active member of the Teachers' Pension Scheme. Part 1 provides the definition of "accepted schools".

The employments listed in this schedule are in line with the existing scheme regulations.

SCHEDULE 2: TRANSFERRED PENSION

The UK Government has confirmed that the public service transfer club will continue to operate. The club arrangements ensure that the treatment of pension savings is not a barrier to individuals moving across the public service. Discussions are on-going with HM Treasury and the other public service schemes on the detail of how the club can best operate in light of the reformed schemes. It is expected that further details will be available soon and appropriate provisions will be added, most likely via amending regulations, once those details are known. The draft regulations include a placeholder for this issue.

Provisions covering transfers to other (private) pension schemes will be added at the same time. The arrangements for these will be in line with current arrangements though the method of calculation will change to take account of the career average arrangements.

SCHEDULE 3: SCHEME FLEXIBILITIES

Schedule 3 provides options for a scheme member or the member's employer to buy additional pension or for the scheme member to elect for a faster accrual rate.

Part 1 sets out definitions used throughout this schedule including, the maximum amount of extra pension a scheme member can elect to purchase, the method for applying indexation to additional pension, and the accrual rates available.

Part 2 provides that, if a scheme member wants to purchase additional pension, an election to that effect must be provided to the scheme manager in writing. This part also sets out the conditions under which additional pension



will be paid to the scheme member or, if appropriate, contributions can be refunded.

Part 3 establishes faster accrual in the reformed scheme, i.e. the flexibility whereby members will be able to build up additional pension benefits each year by paying higher contributions for the year. This part provides for the application for faster accrual and the conditions under which this flexibility will operate.

Part 4 provides for a member with a normal pension age (NPA) of over 65 to buy out up to three years of actuarial adjustment by paying additional contributions (members with an NPA of 66 can buy out one year, members with an NPA of 67 can buy out two years, and so on). An election to that effect must be made to the scheme manager within 6 months of joining the reformed scheme, and this part sets out the conditions under which the adjustment will be applied.

SCHEDULE 4: EMPLOYEES' AND EMPLOYERS' CONTRIBUTIONS

This schedule will contain information on the rate of contributions payable by scheme members and employers. This links directly with the arrangements for valuing the scheme (part 10). HM Treasury are in the process of finalising the overall arrangements for scheme valuations. We expect to consult further on the details for STPS valuations and contribution rates once the overall guidance is determined. We then plan to lay appropriate regulations before the Scottish Parliament in 2014. The draft regulations include a placeholder for this issue.

SCHEDULE 5: TRANSITIONAL PROVISIONS

Schedule 5 provides for scheme members to move from the existing scheme to the reformed scheme on or after 1 April 2015.

Part 1 provides definitions used throughout this schedule. It defines a “full protection member”, confirms the conditions for such protection and the circumstances where such protection would be lost. It further defines a “tapered protection member” and explains the circumstances whereby such a member would lose protection.

Parts 2 to 4 explain the arrangements for full and tapered protection members, including when and how the latter join this scheme.

Part 5 sets out the arrangements that apply to paying benefits to transition members (i.e. those with both final salary and reformed scheme service) for each case type.



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Part 6 sets out various arrangements that apply in respect of the existing scheme to transition members, e.g. that service in both the final salary and reformed schemes will count for qualification purposes in both schemes.



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THE TEACHERS' PENSION SCHEME (SCOTLAND) REGULATIONS 2014

As these regulations run to approximately 100 pages, please see link below to the Teachers' consultation page of the SPPA website.

http://www.sppa.gov.uk/Documents/STSS/STSS%20Useful%20Resources/Consultations/2013/STSS_%20Regulations%202014_Draft%20SSI.pdf



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CONSULTATION RESPONSE FORM

SCOTTISH TEACHERS SUPERANNUATION SCHEME

CONSULTATION ON THE DRAFT TEACHERS' PENSION SCHEME (SCOTLAND) REGULATIONS 2014

(please complete and return to the address at the end of the form to ensure that we handle your response appropriately).

1. Name/Organisation

Organisation Name

Title

Surname

Forename

2. Postal Address

Postcode

Phone

Email

3. Permissions - I am responding as... (please complete either sections (a), (b) and (d) or sections (c) and (d):

Individual or **Group/Organisation**

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please state yes or no: _____

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please state yes to one of the following:

Yes, make my response, name and address all available *or*

Yes, make my response available, but not my name and address *or*

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please state yes or no:

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please state yes or no:



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ABOUT YOU

I am responding ...

- as a scheme member
- on behalf of an Employer Organisation
- on behalf of a Trade Union/Staff Association
- other (please specify)

What is your gender?

- I am female
- I am male

I am employed as...

- a primary school teacher (local authority)
- a secondary school teacher (local authority)
- a head teacher or depute head teacher (local authority)
- an educational psychologist
- a lecturer in further or higher education
- a teacher in an independent school
- I'm retired
- other (please specify)

What is your working pattern?

- I work part-time
- I work full- time
- Not applicable



CONSULTATION QUESTIONS

Question 1: Do these regulations correctly reflect the scheme design set out in the Scottish Government's Framework Document?

Yes
No

Comments:

Question 2: The format of the draft regulations is set out differently from the 2005 Regulations. Do you have any comments on the format of the 2014 Regulations?

Yes
No

Comments:



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Please use this space to provide any further comments.

Comments:

Please e-mail your response to stsspensionsreform@scotland.gsi.gov.uk or send via mail to:

STSS Consultation (2015 reform)
SPPA Policy
7 Tweedside Park
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Galashiels
TD1 3TE

The closing date for receipt of comments is **16 February 2014**.



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