NHS Pension Scheme (Scotland) 2015

Reduction to benefits due to Scheme Pays Annual Allowance and Lifetime Allowance Tax Charge

Factors and guidance

Date: 11 November 2019

Contents

1   Introduction

Purpose

1.1   This Note is addressed to the SPPA as administrator of the NHS Pension Scheme (Scotland) 2015 ('NHSPSS 2015' or 'Scheme'). It sets out how a benefit reduction should be calculated in certain circumstances such as retirement or transfer, following an individual's election to exercise the 'scheme pays' option in respect of tax charges incurred due to the Annual Allowance ('AA'). It also sets out the calculation of the member's and dependant's pension reduction at retirement for a Lifetime Allowance ('LTA') tax charge.

1.2   This document relates to paragraphs 16(3) and 16(16)(b) of Schedule 3 to SSI 2015/94, under which the adjustment to the member's present or future benefits should be calculated by reference to advice provided by the Scheme Actuary for that purpose.

1.3   Relevant legislation in respect of the annual allowance is contained in sections 227, 237B and 237E of the Finance Act 2004.

1.4   The factors and guidance provided in this note have been prepared in light of our advice to SPPA dated 30 October 2018 and its instructions following that advice.

1.5   This guidance and updated factors are intended to supersede any previously issued by GAD for the purposes of scheme pays calculations. The updated factors contained in this guidance should be used for calculations carried out from 29 October 2018. No factors issued in the past should be used for such cases after this date. In particular, this guidance supersedes the previous LTA guidance:

"NHS Pension Scheme (Scotland) 2015: Reduction to benefits due to Lifetime Allowance Tax Charges - Factors and guidance" dated 27 March 2015; and

Addendum to GAD guidance note "NHS Pension Scheme (Scotland) 2015: Lifetime Allowance Reduction Factors".

1.6   There has not previously been a guidance note for AA scheme pays as these debits were previously calculated with reference to the debits for pension sharing on divorce. The method for AA scheme pays is now set out in this guidance note and the pension sharing on divorce method should no longer be used.

1.7   No factors or advice provided for the NHSSS Scotland should be used for reductions to NHSPSS 2015 benefits.

1.8   A summary of the assumptions underlying the factors is listed in Appendix A. The Annual Allowance factors are provided in Appendix B and the Lifetime Allowance factors in Appendix C.

Exclusions and Scope

1.9   This guidance note should only be used for calculating the reduction to benefits following an election to utilise the Annual Allowance or Lifetime Allowance Scheme Pays mechanism. It should not be used for any other purpose.

1.10   SPPA should satisfy themselves that the pension reduction resulting from a Scheme Pays election complies with all legislative requirements including, but not limited to, tax and contracting-out requirements. Any legal advice in this area should be sought from an appropriately qualified person or source.

1.11   This guidance note does not cover the method for determining the amount of any Annual Allowance or Lifetime Allowance charge.

Implementation and review

1.12   The factors contained in this guidance will apply from 29 October 2018. This implementation date has been determined by SPPA.

1.13   This guidance has been written for pension administrators and assumes some knowledge of general pension terminology, and some familiarity with retirement calculations for the NHSPSS 2015. Any questions concerning the application of the guidance should, in the first instance, be referred to SPPA.

1.14   In line with best practice and in order to make sure that factors are being used as intended and the instructions are fit for purpose, we suggest that some example calculations are sent to GAD for review.

1.15   The factors contained in this guidance will be subject to review periodically. This will depend on external circumstances, for example whenever there is a change in the SCAPE basis; when changes in the actuarial assumptions adopted for other scheme factors take place; or following each future actuarial valuation where mortality and other relevant experience is reviewed or if other credible and material information comes to light.

Third party reliance

1.16   This guidance has been prepared for the use of SPPA as the scheme administrators for the purposes of demonstrating the application of the factors covered by this guidance only. This guidance may be published on SPPA's website but must not otherwise be reproduced, distributed or communicated in whole or in part to any other person without GAD's prior written permission.

1.17   Other than SPPA, no person or third party is entitled to place any reliance on the contents of this guidance, except to any extent explicitly stated herein. GAD has no liability to any person or third party for any action taken or for any failure to act, either in whole or in part, on the basis of this guidance, whether or not GAD has agreed to the disclosure of its advice to the third party.

2   Annual Allowance charge

2.1   If a member becomes liable to pay an annual allowance charge in any tax year (and certain conditions are met) they can make an election requiring the scheme administrator to pay all or part of the charge on their behalf. This is commonly known as 'scheme pays'.

2.2   Following an election for the scheme to meet the annual allowance tax charge, consequential adjustments ('annual allowance debits') must be made to the member's benefit entitlements from the scheme.

2.3   Annual allowance debits will need to be calculated in respect of each tax year in which a member elects to allow the scheme to meet the annual allowance tax charge.

2.4   Paragraphs 2.6 to 2.15 set out the guidance for calculating the annual allowance debits at the time of the election.

2.5   Paragraphs 2.16 to 2.21 set out the guidance for calculating the annual allowance debits applying at retirement.

Calculating annual allowance debits

2.6   This section sets out guidance for calculating annual allowance debits which will be applied to a member's benefits.

2.7   The annual allowance debits will not be applied to the benefits payable to a future surviving spouse, civil partner or children on the member's death.

2.8   Annual allowance debits do not affect GMPs.

2.9   The member's age (last birthday) should be calculated as at the implementation date which is 5 April of the tax year to which the tax charge relates.

Calculation of the annual allowance debit at the time of the election

2.10   The annual allowance debit to apply to the pension entitlement should be calculated as shown below.

2.11   The annual allowance pension debit (D^P) should be calculated as:

$$D^P = \frac{TC}{F_x^P}$$

where:

TC annual allowance tax charge payable by the scheme administrator

F_x^P factor for tax charge on pension for a member aged x

2.12   The factors are set out in Table SP65 (Table 611 in consolidated factors spreadsheet) for members with NPA 65, Table SP66 (Table 612 in consolidated factors spreadsheet) for members with NPA 66, Table SP67 (Table 613 in consolidated factors spreadsheet) for members with NPA 67 and Table SP68 (Table 614 in consolidated factors spreadsheet) for members with NPA 68 in Appendix B.

2.13   Factors should be selected according to a member's normal pension age (NPA)[1] and their age (last birthday) at the implementation date.

2.14   SPPA should store the debits calculated above and the implementation date of these debits on the member's record. Where a member has multiple annual allowance debits, they should be recorded separately.

Non-integer NPAs

2.15   Where a member has a non-integer NPA, then factors should be interpolated. For example, for a member with a normal pension age of 67 years and 2 months the factor would be:

$$F_x^P (NPA\ 67\ years\ 2\ months) = F_x^P (NPA\ 67) + \{2/12 \times [F_x^P (NPA\ 68) - F_x^P (NPA\ 67)]\}$$

Implementing debits at retirement

2.16   Guidance and factors for implementing debits at retirement for members retiring early or late in normal health can be found in the latest note "*NHS Pension Scheme (Scotland) 2015: Voluntary early and late retirements in normal health: Factors and guidance*".

2.17   The annual allowance pension debit will be increased in line with the Pensions (Increase) Act up until the member's retirement.

2.18   On **ill health retirement**, each pension debit must be adjusted as follows:

$$AdjD^P = D^P \times PI \times F_x^R$$

D^P annual allowance pension debit

PI pension increase multiplier applying between the implementation date and the date of retirement

F_x^R timing adjustment factor for member retiring at age x

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[1] Normal pension age is defined as a member's state pension age (or 65, if that is higher) in the career average section. For the purpose of this note, a member's expected NPA in the career average section is the same as their state pension age as set out in *The Public Service Pensions (Valuations and Employer Cost Cap) Directions 2014* - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/357130/HMT_valuations_and_cost_cap_directions_reconsolidated_Sept_2014.pdf
(As at the date of this guidance note, there have been no revisions made to paragraph 18 which sets out the State Pension Age assumptions)

2.19 F_x^R is taken from Table TA1 (Table 615 in consolidated factors spreadsheet) in Appendix B. The factor should be selected with reference to the period to a member's NPA (in years and months, with part months rounded up to the nearest month).

2.20   The pension to be implemented at retirement is the full pension, i.e. the pension before any debits, less all of the member's adjusted pension debits.

2.21   Note that if a member:

- takes their pension early due to ill health, and

- is aged under 55 at the time their pension commences, and

- pension increases are not granted until age 55

then the case should be referred to GAD.

Commutation

2.22   Any exchange of pension for a lump sum (under regulation 76 of the National Health Service Pension Scheme (Scotland) Regulations 2015 (SI 2015/94)) should occur **after** the application of annual allowance debits.

3   Annual Allowance examples

3.1   This section provides an example of the calculations described in this note.

3.2   The examples below do not cover every form of annual allowance debit possible. However, it should be sufficient to illustrate the key stages of the guidance outlined in Section 2 of this note.

Example 1: Calculation of annual allowance debit

Member Details

NPA	67
Date of birth	14 March 1965
Annual allowance charge (TC)	£7,500
Tax year of annual allowance charge	2019/20
Implementation date	5 April 2020
Age at implementation date	55 years 0 months

Pension Debit

From 2.11, the formula for calculating the annual allowance pension debit is:

$$D^P = \frac{TC}{F_x^P}$$

F_x^P = 12.87   (from Table SP67)

Substituting these values into the formula we get:

D^P = £7,500.00 ÷ 12.87

                            = £582.75 pa

Record these debits on the member's record with implementation date 5 April 2020. The annual allowance debits will not be applied to the benefits payable to a future surviving spouse, civil partner or children on the member's death.

Example 2: NPA 67 member retiring at age 57 on grounds of ill health, with annual allowance debit

Member details

NPA	67
Sex	Male
Date of birth	16 March 1964
Date of retirement	24 May 2021
Age at retirement (years and complete months)	57 years 2 months
Period to NPA (rounded up to the nearest month)	9 years 10 months
Member's pension before debit	£17,000 pa
Annual allowance pension debit 2015/16	£400 pa
Pension increase uprating factor 2015/16	1.006*

* From 2015/16 debit implementation date, 5 April 2016, to retirement. Illustrative figure for the purpose of this example.

Pension Debit

Under 2.18, the formula for calculating the adjusted pension debit at retirement date is:

$$AdjD^P = D^P \times PI \times F_x^R$$

F_x^R = 0.581 (from Table TA1)

Substituting these values into the formula we get:

Adjusted pension debit   = £400.00 x 1.006 x 0.581

= £233.79 pa

The (pre-commutation) pension payable to the member is the full pension less the member's adjusted pension debit. The annual allowance debits will not be applied to the benefits payable to a future surviving spouse, civil partner or children on the member's death.

Member's pension   = £17,000.00 - £233.79

= **£16,766.21 pa**

4   Lifetime Allowance charge

4.1   The process below is appropriate for members at retirement and subject to benefit reduction due to an LTA charge. The HM Treasury note 'How to pass on the lifetime charge' dated 23 December 2004 remains relevant except that a factor of 20 is no longer applied to convert an LTA charge into a pension reduction. Note the factor of 20 is still applied to determine the amount of any LTA charge.

4.2   The determination of LTA charges is outside the scope of this note but such charges should be determined after the member has decided the form of benefits to be taken (i.e. after commutation decisions).

4.3   Members subject to an LTA charge are subject to a reduction in member's pension and dependant's pension. The dependant's pension entitlement should be reduced by 33.75% of the member's reduction.

Factors

4.4   The factors to be used to determine the member's pension reduction to cover an LTA charge are included as Table SP1 in Appendix C.

4.5   The appropriate factor will depend on the member's age (last birthday) at their date of retirement.

Pension reduction calculation

4.6   The reduction in member's pension should be determined as follows:

Pension within LTA   =   (LTA - tax-free cash taken) / 20   = A

Pension above LTA   =   Pension after commutation chosen - A   = B

Tax charge payable on pension = 25% x 20 x B   = C

Reduction in member's pension   = C / SP1   = D

Tax charge on any excess lump sum is paid by deduction from the lump sum payable to the member.

Pension payable to the member from retirement = A + B - D   = E

Dependant's pension payable following member's death

    = Total dependant's pension – 33.75% x D

4.7   The appropriate reduction applicable in other circumstance (e.g. on retirement at ages below MPA) is outside the scope of this note and such calculations should be referred to GAD.

Appendix A: Assumptions underlying factors

Financial assumptions

Nominal discount rate	4.448% pa
CPI	2.00%
Real discount rate (in excess of CPI)	2.40% pa

Mortality assumptions

Base mortality tables	S2NMA and S2NFA
Base table adjustment	95.5% (Male) / 97.5% (Female) of S2NXA (As per 2016 valuation)
Future mortality improvement	Based on ONS principal UK population projections 2016
Year of Use	2020

Other assumptions

Proportion of male members for the purpose of unisexing factors	33.3%
Allowance for commutation	Nil

Appendix B: Annual Allowance Reduction factors

Table SP65 (Table 611 in consolidated factors spreadsheet)
Factors for calculating annual allowance debit – NPA65

Age at last birthday at relevant date	Annual allowance debit factor per £1 of pension per annum	Age at last birthday at relevant date	Annual allowance debit factor per £1 of pension per annum
20	6.78	50	12.84
21	6.93	51	13.13
22	7.07	52	13.42
23	7.22	53	13.73
24	7.38	54	14.04
25	7.53	55	14.37
26	7.69	56	14.70
27	7.85	57	15.04
28	8.02	58	15.40
29	8.19	59	15.77
30	8.36	60	16.15
31	8.54	61	16.55
32	8.72	62	16.96
33	8.91	63	17.39
34	9.10	64	17.83
35	9.29	65	17.78
36	9.49	66	17.21
37	9.70	67	16.64
38	9.90	68	16.07
39	10.12	69	15.50
40	10.34	70	14.93
41	10.56	71	14.35
42	10.79	72	13.77
43	11.02	73	13.19
44	11.26	74	12.60
45	11.51		
46	11.76		
47	12.02		
48	12.29		
49	12.56		

Table SP66 (Table 612 in consolidated factors spreadsheet)
Factors for calculating annual allowance debit – NPA66

Age at last birthday at relevant date	Annual allowance debit factor per £1 of pension per annum	Age at last birthday at relevant date	Annual allowance debit factor per £1 of pension per annum
20	6.45	50	12.17
21	6.59	51	12.44
22	6.73	52	12.72
23	6.87	53	13.00
24	7.01	54	13.30
25	7.16	55	13.60
26	7.31	56	13.92
27	7.47	57	14.24
28	7.62	58	14.58
29	7.78	59	14.93
30	7.95	60	15.29
31	8.12	61	15.66
32	8.29	62	16.04
33	8.46	63	16.45
34	8.64	64	16.86
35	8.83	65	17.30
36	9.01	66	17.24
37	9.21	67	16.66
38	9.40	68	16.09
39	9.60	69	15.51
40	9.81	70	14.93
41	10.02	71	14.35
42	10.24	72	13.77
43	10.46	73	13.19
44	10.68	74	12.60
45	10.92		
46	11.15		
47	11.40		
48	11.65		
49	11.90		

Table SP67 (Table 613 in consolidated factors spreadsheet)
Factors for calculating annual allowance debit – NPA67

Age at last birthday at relevant date	Annual allowance debit factor per £1 of pension per annum	Age at last birthday at relevant date	Annual allowance debit factor per £1 of pension per annum
20	6.13	50	11.52
21	6.26	51	11.77
22	6.39	52	12.03
23	6.53	53	12.30
24	6.66	54	12.58
25	6.80	55	12.87
26	6.94	56	13.16
27	7.09	57	13.47
28	7.24	58	13.78
29	7.39	59	14.11
30	7.54	60	14.44
31	7.70	61	14.79
32	7.86	62	15.16
33	8.03	63	15.53
34	8.20	64	15.93
35	8.37	65	16.33
36	8.55	66	16.76
37	8.73	67	16.69
38	8.91	68	16.11
39	9.10	69	15.52
40	9.30	70	14.94
41	9.50	71	14.35
42	9.70	72	13.77
43	9.91	73	13.19
44	10.12	74	12.60
45	10.34		
46	10.56		
47	10.79		
48	11.03		
49	11.27		

Table SP68 (Table 614 in consolidated factors spreadsheet)
Factors for calculating annual allowance debit – NPA68

Age at last birthday at relevant date	Annual allowance debit factor per £1 of pension per annum	Age at last birthday at relevant date	Annual allowance debit factor per £1 of pension per annum
20	5.82	50	10.88
21	5.94	51	11.12
22	6.07	52	11.37
23	6.19	53	11.62
24	6.32	54	11.88
25	6.45	55	12.15
26	6.59	56	12.42
27	6.72	57	12.71
28	6.86	58	13.01
29	7.00	59	13.31
30	7.15	60	13.63
31	7.30	61	13.95
32	7.45	62	14.29
33	7.61	63	14.65
34	7.77	64	15.01
35	7.93	65	15.40
36	8.10	66	15.80
37	8.27	67	16.22
38	8.44	68	16.14
39	8.62	69	15.55
40	8.80	70	14.95
41	8.99	71	14.36
42	9.18	72	13.77
43	9.37	73	13.19
44	9.57	74	12.60
45	9.78		
46	9.99		
47	10.20		
48	10.42		
49	10.65		

Table TA1 (Table 615 in consolidated factors spreadsheet) – Timing adjustment on ill health retirements – All NPAs

Period to NPA	Months											
Years	0	1	2	3	4	5	6	7	8	9	10	11
0	1.000	0.993	0.988	0.983	0.978	0.973	0.968	0.963	0.958	0.953	0.948	0.943
1	0.939	0.934	0.930	0.925	0.921	0.916	0.912	0.907	0.903	0.898	0.894	0.889
2	0.885	0.881	0.877	0.872	0.868	0.864	0.860	0.856	0.852	0.847	0.843	0.839
3	0.835	0.831	0.828	0.824	0.820	0.816	0.813	0.809	0.805	0.801	0.798	0.794
4	0.790	0.787	0.783	0.780	0.776	0.773	0.769	0.766	0.762	0.759	0.755	0.752
5	0.748	0.745	0.742	0.738	0.735	0.732	0.728	0.725	0.722	0.718	0.715	0.712
6	0.708	0.705	0.702	0.699	0.696	0.693	0.690	0.687	0.684	0.681	0.678	0.675
7	0.672	0.669	0.666	0.663	0.660	0.657	0.654	0.651	0.648	0.645	0.642	0.639
8	0.637	0.634	0.631	0.628	0.626	0.623	0.620	0.617	0.615	0.612	0.609	0.606
9	0.604	0.602	0.599	0.597	0.595	0.592	0.590	0.588	0.585	0.583	0.581	0.578
10	0.576	0.574	0.571	0.569	0.567	0.565	0.562	0.560	0.558	0.556	0.553	0.551
11	0.549	0.547	0.545	0.543	0.541	0.539	0.536	0.534	0.532	0.530	0.528	0.526
12	0.524	0.522	0.520	0.518	0.516	0.514	0.513	0.511	0.509	0.507	0.505	0.503
13	0.501	0.499	0.497	0.496	0.494	0.492	0.490	0.488	0.486	0.485	0.483	0.481
14	0.479	0.478	0.476	0.474	0.473	0.471	0.469	0.468	0.466	0.464	0.463	0.461
15	0.459	0.458	0.456	0.454	0.453	0.451	0.450	0.448	0.447	0.445	0.443	0.442
16	0.440	0.439	0.437	0.435	0.434	0.432	0.431	0.429	0.428	0.426	0.424	0.423
17	0.421	0.420	0.419	0.417	0.416	0.415	0.413	0.412	0.411	0.409	0.408	0.407
18	0.405	0.404	0.402	0.401	0.400	0.398	0.397	0.395	0.394	0.393	0.391	0.390
19	0.388	0.387	0.386	0.385	0.383	0.382	0.381	0.380	0.378	0.377	0.376	0.375
20	0.373	0.372	0.371	0.370	0.369	0.368	0.366	0.365	0.364	0.363	0.362	0.361

Table TA1 (Table 615 in consolidated factors spreadsheet) – Timing adjustment on ill health retirements – All NPAs *continued*

Period to NPA	Months											
Years	0	1	2	3	4	5	6	7	8	9	10	11
21	0.359	0.358	0.357	0.356	0.355	0.354	0.352	0.351	0.350	0.349	0.348	0.347
22	0.346	0.345	0.344	0.343	0.342	0.341	0.340	0.339	0.338	0.337	0.336	0.335
23	0.333	0.332	0.331	0.330	0.328	0.327	0.326	0.325	0.323	0.322	0.321	0.320
24	0.318	0.317	0.316	0.315	0.314	0.313	0.312	0.311	0.310	0.309	0.308	0.307
25	0.305	0.304	0.303	0.302	0.301	0.300	0.299	0.298	0.297	0.296	0.295	0.294
26	0.293	0.292	0.291	0.290	0.289	0.288	0.287	0.286	0.285	0.284	0.283	0.282
27	0.281	0.280	0.279	0.278	0.278	0.277	0.276	0.275	0.275	0.274	0.273	0.272
28	0.272	0.271	0.270	0.269	0.268	0.267	0.267	0.266	0.265	0.264	0.263	0.262
29	0.262	0.261	0.260	0.259	0.259	0.258	0.257	0.256	0.256	0.255	0.254	0.253
30	0.253	0.252	0.251	0.250	0.250	0.249	0.248	0.247	0.247	0.246	0.245	0.244
31	0.244	0.243	0.242	0.242	0.241	0.240	0.240	0.239	0.238	0.238	0.237	0.236
32	0.236	0.235	0.234	0.234	0.233	0.232	0.232	0.231	0.230	0.230	0.229	0.228
33	0.228	0.227	0.227	0.226	0.225	0.225	0.224	0.224	0.223	0.222	0.222	0.221
34	0.221	0.220	0.220	0.219	0.218	0.218	0.217	0.217	0.216	0.215	0.215	0.214
35	0.214	0.213	0.213	0.212	0.211	0.211	0.210	0.210	0.209	0.208	0.208	0.207
36	0.207	0.206	0.206	0.205	0.204	0.204	0.203	0.203	0.202	0.201	0.201	0.200
37	0.200	0.199	0.199	0.198	0.198	0.197	0.197	0.196	0.196	0.195	0.195	0.194
38	0.194	0.193	0.193	0.192	0.192	0.191	0.191	0.190	0.190	0.189	0.189	0.188
39	0.188	0.187	0.187	0.186	0.186	0.185	0.185	0.184	0.184	0.183	0.183	0.182

Notes:
1) These factors are to be used for implementing pension debits at retirement where the member is retiring on the grounds of ill health.
2) Factors should be selected with reference to the period to a member's NPA (in years and months, with part months rounded up to the nearest month).

Appendix C: Lifetime Allowance Reduction factors

Table SP1 (Table 606 in consolidated factors spreadsheet)
Factors to calculate reduction to pension for LTA charges

Age at last birthday at relevant date	LTA debit factor per £1 pension pa	Age at last birthday at relevant date	LTA debit factor per £1 pension pa
20	34.30	50	25.38
21	34.09	51	24.97
22	33.88	52	24.55
23	33.66	53	24.13
24	33.43	54	23.69
25	33.21	55	23.25
26	32.97	56	22.79
27	32.73	57	22.33
28	32.48	58	21.86
29	32.23	59	21.39
30	31.97	60	20.90
31	31.71	61	20.40
32	31.44	62	19.90
33	31.16	63	19.38
34	30.88	64	18.86
35	30.59	65	18.33
36	30.29	66	17.79
37	29.99	67	17.25
38	29.68	68	16.68
39	29.37	69	16.07
40	29.04	70	15.46
41	28.71	71	14.86
42	28.37	72	14.27
43	28.03	73	13.68
44	27.67	74	13.06
45	27.31	75	12.44
46	26.94		
47	26.57		
48	26.18		
49	25.79		

Appendix D: Limitations

D.1   This guidance should not be used for any purpose other than those set out in this guidance.

D.2   The factors contained in this guidance are subject to regular review. Scheme managers and administrators need to ensure that they are using the latest factors, as relevant, when processing cases.

D.3   Advice provided by GAD must be taken in context and is intended to be considered in its entirety. Individual sections, if considered in isolation, may be misleading, and conclusions reached by a review of some sections on their own may be incorrect. GAD does not accept responsibility for advice that is altered or used selectively. Clarification should be sought if there is any doubt about the intention or scope of advice provided by GAD.

D.4   This guidance only covers the actuarial principles around the calculation and application of annual allowance and lifetime allowance pension debit factors. Any legal advice in this area should be sought from an appropriately qualified person or source.

D.5   Scheme managers and administrators should satisfy themselves that annual allowance and lifetime allowance pension debit calculations and benefit awards comply with all legislative requirements including, but not limited to, tax and contracting-out requirements.

D.6   This guidance is based on the Regulations in force at the time of writing. It is possible that future changes to the Regulations might create inconsistencies between this guidance and the Regulations. If users of this guidance believe there to be any such inconsistencies, they should bring this to the attention of SPPA and GAD. Under no circumstances should this guidance take precedence over the Regulations. Administrators should ensure that they comply with all relevant Regulations.