



Transitional Protection Remedy: Analysis to Support the Equalities Impact Assessment (Preliminary) NHS (Scotland) Pension Scheme

DRAFT - November 2021

This report is labelled 'Preliminary' because it assesses only the impact of the 'Prospective Remedy Phase' of the Transitional Protection Remedy. The Prospective Remedy Phase relates to the policy decision to close all legacy schemes to future accrual with effect from 1 April 2022.

A further version of this report, which also covers the impact of the 'Retrospective Remedy Phase' where all members will be provided with a choice of benefits over the remedy period, will follow in due course.

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1. Introduction

Purpose

- 1.1. This report is addressed to, and has been prepared at the request of, the Scottish Public Pensions Agency ('SPPA').
- 1.2. The Public Sector Equality Duty ('PSED') was created by the Equality Act 2010 and is supported by the specific duties contained in the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012, as amended.
- 1.3. The PSED requires the Scottish Government to assess the impact of applying a proposed new, or revised, policy or practice. Scottish Ministers must have 'due regard' to the need to eliminate discrimination, advance equality of opportunity and foster good relations between people with different protected characteristics when carrying out their activities.
- 1.4. There are nine protected characteristics identified in the Equality Act 2010: (1) sex, (2) age, (3) disability, (4) race, (5) religion or belief, (6) gender reassignment, (7) pregnancy and maternity, (8) sexual orientation, (9) marital or civil partnership status.
- 1.5. **The purpose of this report is to provide analysis, specifically in relation to the NHS (Scotland) Pension Scheme¹, to support SPPA who are acting on behalf of Scottish Ministers, in considering the impact of the policy decision to close all legacy schemes to future accrual with effect from 1 April 2022.**
- 1.6. This is one aspect of the proposed approach to address the age discrimination identified in the 2015 public service pension reforms, referred to as 'Transitional Protection Remedy', or 'McCloud remedy'. A further report will follow in due course, which also covers the policy decision to provide eligible members with a choice of legacy or reformed scheme benefits over the remedy period.

Background

- 1.7. When public service pension reforms were introduced in 2015, the UK Government agreed to allow those closest to their retirement age to stay in their legacy schemes. These arrangements were referred to as transitional protection arrangements.

¹ For the NHS (Scotland) Pension Scheme, the legacy schemes are the 1995 section and the 2008 section, and the reformed scheme is the 2015 Scheme.

- 1.8. For the NHS (Scotland) Pension Scheme, this meant the following criteria applied for scheme membership after 31 March 2015:

A. 1995 section - excluding Special Classes

- All 1995 section members in pensionable service on 1 April 2012 or members with entitlement to vested benefits in the Scheme from service before that date who re-join pensionable service within five years of their date of leaving and whose date of birth is on or before 1 April 1962, **would remain in their existing Scheme**.
- Any members exercising the option to switch to the 2008 section were treated as 2008 section members for the purposes of protection.

B. 1995 section - Special Classes

- All members in special class posts as at 1 April 2012, or otherwise with entitlement to vested benefits from service before 1 April 2012 and in reserved posts as at 1 April 2015 or their date of ceasing to accrue benefits in the Scheme and who were within 10 years of their earliest pension age as at 1 April 2012 i.e. whose date of birth is between 1 April 1962 and 1 April 1967, **would remain in their existing Scheme**.
- Entitlement to unreduced benefits before age 60 continued to be based on the existing criteria.
- Any members exercising the option to switch to the 2008 section were treated as 2008 section members for the purposes of protection.

C. 2008 section

- All 2008 section members in pensionable service on 1 April 2012 or members with entitlement to vested benefits in the Scheme from service before that date who re-join pensionable service within five years of their date of leaving and whose date of birth is on or before 1 April 1957, **would remain in their existing Scheme**.
- Members in scope of protection were provided with a one-off opportunity to switch to the 2015 scheme with effect from 1 April 2015.

D. Members meeting the above criteria but within a further 3 years and 5 months of retirement age at 1 April 2012 would transfer to the 2015 scheme at a date between 1 June 2015 and 1 February 2022.

- 1.9. In this report, members in categories A, B and C above are referred to as 'Protected' members and members in category D are referred to as 'Tapered Protected' members.
- 1.10. Following a challenge in the Courts, however, it was found that such transitional arrangements were discriminatory on the grounds of age and, for certain schemes, gave rise to indirect sex and race discrimination. Although this judgment was not in relation to the NHS (Scotland) Pension Schemes, the UK Government determined that it had read across to all of the main public service pension schemes across the UK.

1.11. To address the discrimination identified, it was announced that:

- In relation to service from 1 April 2015 to 31 March 2022 (known as the ‘remedy period’), all eligible members will have a choice between:
 - legacy scheme benefits (i.e. benefits in the 1995 section or the 2008 section in the NHS (Scotland) Pension Scheme)
or
 - benefits equivalent to those available under the reformed scheme (benefits in the 2015 Scheme in the NHS (Scotland) Pension Scheme)
- There will not be an option to have a combination of benefits in the legacy scheme and the reformed scheme over the remedy period.
- Eligible members were defined as those who were in service on or before 31 March 2012 and still in service on or after 1 April 2015.
This includes members who are currently active, deferred or retired and those with a non-disqualifying break in service of no more than five years.
- Members will be able to make their choice at the point at which they will receive their scheme benefits. Where a member’s benefits are already in payment, the choice will be offered as soon as practicable.
- From 1 April 2022, all members will accrue benefits in their reformed scheme, the 2015 Scheme, regardless of age. There will be no further benefits accrued in the legacy schemes from this point.

1.12. The [Public Service Pensions and Judicial Offices Bill](#) is the legislative vehicle that sets out the provisions that give effect to the above announcements and it will apply across all schemes in the UK in relation to the Transitional Protection Remedy. This is currently progressing through the UK Parliament. The Equality Impact Assessment ('EqIA') carried out alongside this Bill can be found at the link above.

1.13. Scottish Ministers are responsible for making the secondary legislation to amend the NHS (Scotland) Pension Scheme. This secondary legislation will be delivered in two phases:

A. *Prospective Remedy Phase (due to be in force for 1 April 2022):*

- Legacy schemes will close on 31 March 2022 and all members who continue in pensionable service from 1 April 2022 will do so as members of the 2015 Scheme.

B. *Retrospective Remedy Phase (planned for Autumn 2022):*

- From 2022, eligible members will be able to choose to receive legacy pension scheme benefits or benefits equivalent to those available under the reformed pension scheme for service between 2015 and 2022.

Policy to be assessed

- 1.14. This Preliminary report is intended to support consideration of the impact of the Prospective Remedy Phase (as noted in 1.13 above) but will be updated in due course to consider both the Prospective and Retrospective Remedy Phases of the secondary legislation.
- 1.15. Further information on our approach to assessing this is provided in chapter 2.

Next steps

- 1.16. Chapters 3-5 consider the potential impact of the proposed measures by reference to the protected characteristics identified in the Equality Act 2010.
- 1.17. We have included commentary on the analysis of the data which SPPA may wish to use in the preparation of their EqIA. However, it is important to note that **it is for SPPA, acting on behalf of Scottish Ministers, to review this analysis and ultimately determine their view of the assessment of the equalities impact** i.e. have ‘due regard’ as to whether the policy treats someone less favourably due to a protected characteristic.
- 1.18. We very much welcome input into how to refine this initial analysis, by contributing further perspectives or identifying where there might be additional equality impacts to consider.

2. Approach to Assessment

We have set out below the information we will use as a basis for examining the protected characteristics.

Closing legacy schemes with effect from 1 April 2022

- 2.1. In this report, we have examined the impact of this policy decision on Protected members only. Under the Transitional Protection Remedy, Protected members will now be moved into the 2015 Scheme from 1 April 2022, whereas these members previously had an expectation from the 2015 reforms of continuing in their legacy arrangement after 1 April 2022. In all circumstances, Tapered Protected and unprotected members were due to accrue benefits in the 2015 Scheme from 1 April 2022.
- 2.2. For the avoidance of doubt, closing legacy schemes to future accrual with effect from 1 April 2022 will only impact Protected members **who are still accruing benefits as at 1 April 2022**. Given that Protected members will be at an age at which they can retire on or before 31 March 2022 without any actuarial reduction for early payment applying, it is likely that the vast majority of Protected members will have retired by that point.
- 2.3. At this stage, we are not able to provide the number and characteristics of the Protected members who may still be accruing benefits as at 1 April 2022.
- 2.4. Therefore, as outlined below, we have used the most recent data available to us to consider the impact of the UK Government's policy decision to close legacy schemes to future accrual with effect from 1 April 2022.
- 2.5. It is also worth highlighting that further consideration is being given to the approach in relation to members who request to retire due to ill-health ahead of 31 March 2022, but where this is not granted until after 1 April 2022. We have not analysed this situation specifically in this document, but it may be worth reassessing the protected characteristic of disability further once the approach has been clarified.

Data used

- 2.6. The most recent data available to the Government Actuary's Department (GAD) is that provided to GAD by SPPA for the purposes of the 31 March 2016 actuarial valuation.
- 2.7. The data to be used for the next actuarial valuation, as at 31 March 2020, has not yet been finalised but we can update our assessment to reflect more recent data if and where it becomes available.
- 2.8. The table below sets out the number of Protected members as at 31 March 2016:

	1995 Section	2008 Section	Total
Protected members in service as at 31 March 2016	33,548	1,364	34,912
<i>Proportion of total number of Protected members</i>	<i>96%</i>	<i>4%</i>	

- 2.9. We have also shown below the total number of active members in the Scheme as at 31 March 2016:

		Number of members	Proportion of the membership (based on number of members)
Eligible for Transitional Protection remedy	<i>Protected members</i>	34,912	20%
	<i>Tapered Protected members</i>	14,472	8%
	<i>Unprotected members</i>	70,602	40%
	Total	119,986	68%
Not eligible for Transitional Protection remedy		57,084	32%
Total		177,070	100%

- 2.10. The table above shows that 20% of the active membership of the scheme as at 31 March 2016 were Protected members.
- 2.11. We acknowledge that this data is at a date which does not reflect the specific point in time at which the measure will come into place. As noted in 2.2, we expect that most of the Protected members identified as at 31 March 2016 will have retired by 1 April 2022, such that much less than 20% of the active scheme members at that date are, in reality, impacted. However, since we cannot be sure which Protected members will remain in active service at 1 April 2022, we consider it is appropriate to use the 31 March 2016 actuarial valuation data for this analysis, particularly as there is currently no alternative.

- 2.12. Data on sex and age of the membership of the NHS (Scotland) Pension Scheme was provided to GAD by SPPA for the purposes of the 31 March 2016 actuarial valuation.
- 2.13. For the other protected characteristics under the Equality Act 2010, SPPA does not hold complete or up-to-date data. However, where data for the whole of the NHS' workforce in Scotland is available, this has been used as an approximation.

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3. Equality Impact Analysis: Age

This Chapter sets out our analysis of the equality impacts of the policy decision to close the legacy schemes to future accrual with effect from 1 April 2022 on the protected characteristic of age as identified in the Equality Act 2010.

Closing legacy schemes with effect from 1 April 2022

Introduction

- 3.1. As previously outlined, the Courts determined that the transitional protection element of the 2015 public service pension scheme reforms treated those members who were closest to retirement more favourably than younger members and this amounted to direct age discrimination. Although this judgment was not in relation to the NHS (Scotland) Pension Scheme, the UK Government determined that it had read across to all of the main public service pension schemes across the UK.
- 3.2. The UK Government's policy decision to no longer permit Protected members to accrue benefits in the legacy schemes after 31 March 2022 is one aspect of the approach that is to be taken to address the age discrimination identified. All Tapered Protected and unprotected members would be accruing benefits in the reformed scheme by this point, so this decision only impacts Protected members.
- 3.3. Given this policy decision only impacts Protected members, it is to be expected that those affected will be older than the general scheme population. However, this is deemed necessary to remove the age discrimination that had previously been identified, and to ensure that all members are treated equitably from 1 April 2022.

Analysis

- 3.4. The following table sets out the age profile of all active members in the NHS (Scotland) Pension Scheme, as well as the age profile of the Protected members only, as at 31 March 2016:

Age as at 31 March 2016	Active Membership as at 31 March 2016	Membership with Full Protection as at 31 March 2016
20-24	4%	-
25-29	9%	-
30-34	11%	-
35-39	12%	-
40-44	12%	-
45-49	16%	2%
50-54	18%	26%
55-59	13%	50%
60 and above	6%	23%
Total	177,070	34,912

- 3.5. Please note that, due to rounding, the percentages shown above may not sum to 100%.
- 3.6. The following table sets out which scheme the 34,912 Protected members as at 31 March 2016, within each age group, are accruing benefits in:

Age	1995 Section	2008 Section	Total
45-49	100%	-	2%
50-54	100%	-	26%
55-59	99%	1%	50%
60 and above	85%	15%	23%

To be clear, the total percentage shown represents the percentage of the 34,912 fully Protected members as at 31 March 2016 who fall within that age range. The percentages shown under the 1995 Section and 2008 Section columns represent the percentage of fully Protected members in that age group within the respective schemes.

- 3.7. This analysis identifies that:
- As expected, Protected members are older than the general scheme population.
 - Half of all Protected members were between ages 55 and 59 as at 31 March 2016.
 - At this age range of 55-59, almost all Protected members are accruing benefits in the 1995 section.

3.8. **Commentary on analysis:**

As illustrated above, Protected members are older than the general active member population. Continuing to provide Protected members with access to the legacy schemes would discriminate against younger members who are not offered this option.

Therefore, applying a policy that removes the provision of potentially favourable treatment to older members compared with others in the scheme is deemed necessary.

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4. Equality Impact Analysis: Sex

This Chapter sets out our analysis of the equality impacts of the policy decision to close the legacy schemes to future accrual with effect from 1 April 2022 on the protected characteristic of sex as identified in the Equality Act 2010.

Closing legacy schemes with effect from 1 April 2022

Introduction

- 4.1. In determining that the transitional protection arrangements discriminated on the grounds of age, the Courts also concluded that if older members in a scheme were more likely to be male, providing older members with preferential terms amounted to indirect sex discrimination.
- 4.2. The policy decision to no longer permit Protected members to accrue benefits in the legacy schemes after 1 April 2022 is one aspect of addressing the age discrimination identified and, in turn, the indirect sex discrimination where it too applies.
- 4.3. We have analysed below the split of the Protected members by sex ².

Analysis: Sex

- 4.4. The following table sets out the sex profile of the members in the NHS (Scotland) Pension Scheme, as well as the sex profile of the Protected members:

	Active Membership as at 31 March 2016	Protected members as at 31 March 2016
Males	21%	20%
Females	79%	80%
Total	177,070	34,912

- 4.5. This analysis identifies that:
 - The percentage of the Protected members who are male, is consistent with the percentage of the overall scheme population who are male.

² The Equality Act 2010 lists 'sex' as a protected characteristic. Data for the NHS (Scotland) Pension Scheme is also available by sex. However, it is important to note that sex and gender are two different concepts. A person's gender identity is not always the same as the sex assigned to them at birth, and some people may not identify as having a gender or as non-binary. Gender reassignment is also a protected characteristic under the Equality Act 2010, and this is examined in Section 5.

4.6. The following table sets out the percentage of male and female Protected members in each section as at 31 March 2016:

	1995 Section	2008 Section	All Protected Members
Males	19%	37%	20%
Females	81%	63%	80%
Total	33,548	1,364	34,912

4.7. This analysis identifies that:

- The percentage of Protected members who are male and accruing benefits in the 1995 section is consistent with the overall percentage for all Protected members. This is expected given the high proportion of Protected members who are building up benefits in this section.
- The percentage of Protected members who are male and accruing benefits in the 2008 section is higher than the overall percentage for all Protected members.

4.8. **Commentary on analysis:**

Based on the analysis above, Protected members are no more likely to be female than the overall scheme population (80% compared to 79%).

On this basis, there is no evidence here to suggest a likely impact in terms of indirect sex discrimination arising from the closure of legacy schemes to future accrual.

Analysis: Sex and Age

4.9. We have also set out below the percentage of males in both the overall scheme population and the Protected members' population at each age range:

Age as at 31 March 2016	Active Membership as at 31 March 2016	Protected Members as at 31 March 2016
20-24	18%	-
25-29	20%	-
30-34	19%	-
35-39	20%	-
40-44	21%	-
45-49	20%	11%
50-54	20%	13%
55-59	22%	22%
60 and above	25%	25%

4.10. This analysis identifies that:

- The percentage of the active member population that is male is broadly unchanged across all ages. Accordingly, the percentage of Protected members (who are generally older) who are male is consistent with the overall scheme population.
- The percentage of Protected members who are males and aged 45-54 as at 31 March 2016 is less than the overall scheme population at the relevant ages. However, as noted in 3.4, only 28% of Protected members are in this age range.

4.11. **Commentary on analysis:**

The above analysis supports the comments in 4.8 that Protected members are more likely to be female, but this is reflective of the overall active scheme population.

Analysis: Sex and Earnings

- 4.12. Moving from a final salary legacy scheme to a career average reformed scheme for future accrual decreases the added benefit of late career pay progression.
- 4.13. This means that the policy decision to no longer permit Protected members to accrue benefits in the legacy schemes from 1 April 2022 is likely to have a negative impact on those who, in future years, achieve higher salary progression, rather than those with lower salary progression.
- 4.14. However, it is worth noting that the impact of this is likely to be limited given that:
- For Protected members who continue accruing benefits beyond 31 March 2022, their benefits in the legacy scheme will be calculated based on their 'final salary' when they leave the Scheme, rather than as at 31 March 2022.
 - It would seem unlikely that many Protected members would experience significant pay progression after 31 March 2022, given how close they are to their retirement age.
- 4.15. Across the UK's public service pension schemes, a larger proportion of males reach higher salary bands than females and, therefore, of those who may be negatively impacted by this policy decision, a higher proportion will be male.

- 4.16. We have then provided below the proportion of the membership at each payband that is male in both populations.

Full time Equivalent Salary as at 31 March 2016	Active membership as at 31 March 2016	Protected members as at 31 March 2016
£0-19,999	17%	15%
£20,000-29,999	18%	17%
£30,000-39,999	17%	14%
£40,000-49,999	20%	18%
£50,000-59,999	27%	26%
£60,000-69,999	31%	32%
£70,000-79,999	38%	37%
£80,000-89,999	48%	42%
£90,000-99,999	56%	52%
£100,000 and above	63%	71%

- 4.17. This analysis identifies that:

- In both the overall active scheme membership and the Protected member only population, higher earners are more likely to be male.
- However, the difference in the percentage of males in the lower paybands compared to the higher paybands is similar for both the entire active member population and the Protected members only population.

- 4.18. **Commentary on analysis:**

The above analysis highlights that higher earning Protected members are more likely to be male compared with lower earning Protected members.

Within the group of Protected members, therefore, the remedy could be seen as having a greater effect on males. Looked at in the context of the pension schemes in their entirety, however, the measure is intended to ameliorate discrimination across the board and any impact within the Protected members category can be seen as objectively justifiable.

Analysis: Sex and Employment Status

- 4.19. In Scotland, women are more likely to work part-time than men.³ It is therefore worth considering the equalities impact of those who work part-time within this protected characteristic.
- 4.20. The analysis below provides a split of the scheme membership into those working part-time and those not.

	Active Membership as at 31 March 2016	All Protected Members as at 31 March 2016
Full-time	51%	60% (21,040)
Part-time	49%	40% (13,872)
Total	177,070	34,912

- 4.21. Of those 13,872 Protected members working part-time as at 31 March 2016:
 - 13,246 were female (95%).
 - 13,204 (95%) of Protected members working part-time were accruing benefits in the 1995 section.
- 4.22. This analysis identifies that:
 - As at 31 March 2016, the percentage of the Protected members working part-time was lower than the percentage of the overall scheme population working part-time.
 - Of those Protected members working part-time, the percentage that are female (95%) is much higher than percentage of the active population that is female (79%) and the percentage of the Protected member population that is female (80%).

Commentary on analysis:

Based on the above analysis, Protected members are less likely to work part-time. This might have been expected since Protected members are older and part-time working has become more common in recent years.

Women are shown to make up the vast majority of the part-time Protected members. However, we have not identified any disproportionate impacts of the policy on this group.

³ <https://www.closethegap.org.uk/content/gap-statistics/>

5. Equality Impact Analysis: Other Protected Characteristics

This Chapter sets out our analysis of the equality impacts of the policy decision to close the legacy schemes to future accrual with effect from 1 April 2022 on the other protected characteristics as identified in the Equality Act 2010.

- 5.1. SPPA does not hold complete or up-to-date data on the other protected characteristics under the Equality Act 2010.
- 5.2. For the remaining protected characteristics, we had hoped to use data for the NHS workforce in Scotland as a whole, rather than pension scheme membership. However, we have been unable to easily locate such data; we will discuss with SPPA what they might be able to acquire for these purposes.
- 5.3. In the absence of data for the entire NHS workforce in Scotland, we have sourced data for the Greater Glasgow and Clyde NHS Health Board, as an indication of what the protected characteristics for the scheme membership as a whole might be. At this stage, however, we have no way of knowing if this is reflective of the entire scheme population so we have not yet analysed each protected characteristic.
- 5.4. For the data in relation to the Greater Glasgow and Clyde (GGC) NHS Health Board, we considered information in the following sources:
 - Information as at 2017:
https://www.nhsggc.org.uk/media/256218/nhsggc_equalities_workforce_metrics_2017.pdf
 - Information as at 2021:
[2020-11 - GGC \(Equal Pay\) v2.xlsx \(nhsggc.org.uk\)](2020-11 - GGC (Equal Pay) v2.xlsx (nhsggc.org.uk))
- 5.5. The proposed changes will apply to all members regardless of these protected characteristics.

Disability

- 5.6. Available data on this characteristic in relation to the NHS workforce in Scotland or NHS (Scotland) Pension Scheme membership is limited. Although there is limited data available, if new data indicates that this group may suffer disproportionate adverse effects we will consider the impact further.

Race/Ethnicity

- 5.7. Available data on this characteristic in relation to the NHS workforce in Scotland or NHS (Scotland) Pension Scheme membership is limited. Although there is limited data available, if new data indicates that this group may suffer disproportionate adverse effects we will consider the impact further.

Religion or Belief

- 5.8. Available data on this characteristic in relation to the NHS workforce in Scotland or NHS (Scotland) Pension Scheme membership is limited. Although there is limited data available, if new data indicates that this group may suffer disproportionate adverse effects we will consider the impact further..

Gender reassignment

- 5.9. Available data on this characteristic in relation to the NHS workforce in Scotland or NHS (Scotland) Pension Scheme membership is limited. Although there is limited data available, if new data indicates that this group may suffer disproportionate adverse effects we will consider the impact further.

Pregnancy and maternity

- 5.10. Available data on this characteristic in relation to the NHS workforce in Scotland or NHS (Scotland) Pension Scheme membership is limited. Although there is limited data available, if new data indicates that this group may suffer disproportionate adverse effects we will consider the impact further.

Sexual orientation

- 5.11. Available data on this characteristic in relation to the NHS workforce in Scotland or NHS (Scotland) Pension Scheme membership is limited. Although there is limited data available, if new data indicates that this group may suffer disproportionate adverse effects we will consider the impact further.

Marriage and civil partnership

- 5.12. Available data on this characteristic in relation to the NHS workforce in Scotland or NHS (Scotland) Pension Scheme membership is limited. Although there is limited

data available, if new data indicates that this group may suffer disproportionate adverse effects we will consider the impact further.

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Appendix A: Data and Assumptions

Data

- The analysis in this report is based on the data provided by SPPA to GAD for the 2016 actuarial valuation, as detailed in our note "[NHS \(Scotland\) Pension Scheme - Actuarial valuation as at 31 March 2016: Report on membership data](#)" of 15 February 2019.
- Whilst comprehensive data was received from SPPA for the 2016 valuation, some aspects of the data were incomplete and/or unreliable for certain elements of our valuation calculations. It was not possible to fully resolve those data issues in the timescale required for the valuation and, therefore, assumptions were required in respect of incomplete and/or unreliable individual member records. Further information on the steps taken to address data issues can be found in the above report.
- Please note that a member has been classed as 'full-time' if the part-time proportion provided by SPPA for the purposes of the 31 March 2016 actuarial valuation was recorded as 1 or 100%. All other members have been assumed to be part-time. Please note that rigorous checks were not carried out on the part-time proportions provided.

Appendix B: Compliance and limitations

- This report is intended for the use of the Scottish Public Pensions Agency ('SPPA') for the purposes of analysing the potential impact of the Transitional Protection Remedy. The information and advice in this report should not be relied upon, or assumed to be appropriate, for any other purpose or by any other person. GAD does not accept any liability to third parties, whether or not GAD has agreed to the disclosure of its advice to the third party.
- This report has been carried out in accordance with the applicable Technical Actuarial Standard: TAS 100 issued by the Financial Reporting Council (FRC). The FRC sets technical standards for actuarial work in the UK.