



Scottish Public
Pensions Agency
Buidheann Peinnseanan
Poblach na h-Alba

**Firefighters' Pension Scheme
(Scotland) 2015 Regulations:
Member Contribution Rates -
Scottish Government
Consultation 2025**

About This Consultation

Overview

The Firefighters' Pension Scheme (Scotland) continues to be an integral part of the remuneration package, and offers significant value in retirement to people who have chosen to dedicate part, or all, of their careers to serve as firefighters in Scotland. As a defined benefit pension scheme it offers the security of a guaranteed income in every year of retirement for all its members.

The Scottish Public Pensions Agency (SPPA) administers the pension scheme and, on behalf of the Scottish Ministers, maintains the rules of the pension scheme.

Changes to the employee contribution rate from 1 July 2025

This consultation outlines changes to the employee contribution rate effective from 1 July 2025. A scheme valuation was carried out by the Government Actuary's Department (GAD) on behalf of the Scottish Government based on scheme data held as at March 2020.

The scheme valuation assesses what each pension scheme needs now in order to meet future liabilities. Employer rates are calculated based on an assumed yield of contributions from scheme members set out in the reformed scheme design framework of 2014/15. As a result of the latest valuation on data held as at 31 March 2020, a shortfall in the member contribution yield of 0.23% was identified.

In consultation with the Firefighters' Pension Scheme (Scotland) Advisory Board (SAB), made up of representatives of employers and members it was agreed that the delivery of the yield is fundamental to the scheme's sustainability.

Duration of Consultation

This consultation will run from 21 February 2025 to 18 April 2025.

How to respond

Please use the consultation response form which can be downloaded from the SPPA website and once completed, send to SPPAPolicyConsultationResponses@gov.scot before midnight on the closing date.

Alternatively, responses can be posted to:

Firefighters' Pension Scheme Consultation
SPPA
Tweedside Park
Tweedbank
Galashiels
TD1 3TE

Further Information

If you are unable to access an electronic version of the document, please write to the above address and a paper copy will be provided.

Data Protection Statement

The SPPA is an executive agency of the Scottish Government and forms part of the legal entity of the Scottish Ministers ([Framework Document](#)).

This framework of statutory powers and responsibilities, as agreed with the Scottish Ministers, enables SPPA to undertake the role of data controller for the processing of personal data which is provided as part of your response to the consultation. Any response you send us will be seen in full by SPPA staff dealing with the issues which this consultation is about or planning future consultations.

The process allows informed decisions to be made about how SPPA exercises its public function.

Where SPPA undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g., a research organisation or a consultancy company). Any such work will only be undertaken under contract. SPPA use Scottish Government standard terms and conditions for such contracts which set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the SPPA intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response.

If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation.

If your details are published as part of the consultation response, then these published reports will be retained indefinitely. Any of your data held otherwise by SPPA will be kept for no more than three years.

Under the data protection legislation, you have the right:

- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability

- to lodge a complaint with the Information Commissioner's Office (ICO), the independent regulator for data protection.

For further details about the information the SPPA holds and its use, or if you want to exercise your rights under the GDPR, please refer to our Privacy Policy in the first instance or contact:

Agency Data Protection Officer Scottish Public Pensions Agency
7 Tweedside Park
GALASHIELS
TD1 3TE

Tel: 01896 893000

Website: <https://pensions.gov.scot/>

The contact details for the Information

Commissioner's Office are:
Wycliffe House Water Lane Wilmslow Cheshire
SK9 5AF

Tel: 01625 545 745 or
0303 123 1113

Website: <https://ico.org.uk>

1. Member contribution rates and the scheme valuation

Background

1.1 The Public Service Pensions Act 2013 introduced the legal framework for reformed public service pensions. A key aspect of the reforms was the introduction of regular actuarial valuations of the public service pension schemes in order to effectively measure the costs of the benefits being provided. Valuations of public service pension schemes, including the Scottish Firefighters' Pension Scheme, must be undertaken every four years. Each valuation is conducted according to HM Treasury directions and is carried out by the Government Actuary's Department (GAD) on behalf of the Scottish Ministers, based on scheme data held as at 31 March of the relevant year.

1.2 The latest scheme valuation was based on scheme data at 31 March 2020 (the 2020 valuation). It assessed the anticipated costs of benefits accruing over the implementation period from 1 April 2024 to 31 March 2027, and set the employer contribution rate accordingly. As a consequence the contribution rate payable by the Scottish Fire and Rescue Service (SFRS) increased by 5.6% on 1 April 2024. The 2020 Valuation was finalised and published on 26 January 2024.

1.3 The overall cost of benefits in the implementation period, plus any past service costs, is met by a combination of the employer and employee contribution rates. The employer rate is calculated based on a number of factors, and ultimately set on the basis of the assumed yield of contributions from scheme members. This target yield is set out in the reformed scheme design framework of 2014/15 and is set at 13.2% of pensionable pay.

1.4 In setting the initial rates for the 2015 scheme the Scottish Ministers took into account contributions from the active membership and benefit accrual across the legacy final salary 1992 and 2006 schemes. The legacy schemes closed to active membership on 31 March 2022, and so the existing member contribution rates for the 2015 scheme, structured on a career average revalued earnings (CARE) basis, have been reviewed to assess if they can deliver the required yield. The 2020 scheme valuation identified that the expected yield, as currently structured, would not be met at 12.97%, a shortfall of 0.23%.

Current Member Contribution Rate Structure

1.5 With the introduction of the Scottish Firefighters' Pension Scheme in 2015, member contribution rates were structured in four bands, based on a firefighters' whole time equivalent pay. Annual changes were initially hardcoded into the scheme regulations, with increases to the bands of 1% each year from 2015/16, designed to provide for the yield to achieve at least some limited tracking to increases in firefighters' pensionable pay.

1.6 This annually predetermined increases to the structure ceased at the end of the 2015 – 2019 implementation period, and have remained the same since 1 April 2018. The current structure is shown below:

Band	Salary Range (Whole Time Equivalent)	Current Member Contribution Rate
Band 1	£0 to £27,818	11.0%
Band 2	£27,819 to £51,515	12.9%
Band 3	£51,516 to £142,500	13.5%
Band 4	£142,501+	14.5%

Proposed Changes to the member contribution rate from 1 July 2025

1.7 In undertaking the 2020 valuation, GAD confirmed that the existing member rates would not deliver the 13.2% target yield over the implementation period 1 April 2024 to 31 March 2027. The anticipated yield is calculated to be 12.97%.

1.8 The SPPA has therefore worked closely with Scottish Firefighters’ Scheme Advisory Board (SAB), which comprises representatives of members and the employer and provides advice to the Scottish Ministers on changes to the pension scheme, to review the member contribution structure. First and foremost, the SAB agreed that achieving the target yield is fundamental to the sustainability of the scheme.

1.9 A number of options and approaches to achieving the target yield were considered, which included:

- **the use of whole time equivalent (WTE) or actual pay to set contribution bands.** Currently contributions are based on the whole time equivalent (WTE) pensionable salary of a firefighter. The impact of using WTE is part time/retained firefighters contribute pro-rata more of their salary than their full time colleagues, compared to actual pay where they would contribute pro-rata an equal amount.
- **future proofing the structure to protect the yield against future pay increases.** by indexing the tiers to reliable economic indicators, such as the Consumer Price Index (CPI), changes in average weekly earnings or the annual pay award should reduce the requirement for future member contribution rate changes.
- **the optimal method of indexing the bands and the impact of band changes on scheme membership amongst lower paid and part-time /retained firefighters.** The Government Actuary’s Department provided several costed options (provided in the tables below) for consideration, all of which would have met the member contribution yield. Whilst the tiered approach does mean higher earners pay a higher percentage rate of their pensionable salary, this is offset by those on a higher tax band benefitting more through higher tax relief on pension contributions.

- **moving to a single flat rate contribution rate of 13.2%, similar to the approach taken in the police pension scheme.** Whilst the single flat rate is the simplest option to introduce, it does mean those on a higher tax band benefitting more through higher tax relief on their pension contributions.

1.10 In consultation with the SAB agreement was reached that:

- **Contributions should be based on Actual pay.** The SAB agreed that basing contributions on actual pay would be fairer to part time/retained firefighters who currently contribute at the higher WTE rate. The structure of CARE scheme benefit provisions means that benefits accrue proportionately to earnings in each year, unlike in a final salary scheme where the pension is based on pensionable pay and service at the point of retirement. There remains a final salary link for all members who have transitioned from legacy schemes, which is designed to protect the value of legacy scheme benefits, and this is calculated at WTE for part-time members. However there is less justification to maintain the approach of basing contribution rates on whole time equivalent pay across the membership, many of whom have service in the 2015 scheme only.
- **A Tiered Structure should be Maintained.** The SAB agreed that maintaining a tiered rate approach, with increasing rates linked to higher salaries, would likely protect the high levels of scheme participation at all firefighting roles.
- **Futureproofing the Contribution Structure.** The SAB recognised that introducing a methodology to uprate the contribution structure on an annual basis would help to ensure as far as possible that the target yield would continue to be met. Whilst consideration was given to fixing the bands to increase in line with CPI (by reference to the annual pensions increase orders, the SAB considered that the most accurate way to protect the yield was to increase the bands in line with annual pay awards. It is recognised that the timing of agreements being reached on pay awards could impact the success of this proposed policy.

1.11 We therefore propose to amend the Firefighters' Pension Scheme (Scotland) Regulations 2015 to increase the current employee contribution yield of 12.97% to 13.2%, effective from 1 July 2025. The Scottish Government also proposed to undertake an exercise each year to amend the bands in line with pay awards.

1.12 The proposed changes to the tiered rates, based on actual pay, are summarised in Table 1 below:



Table 1: Proposed Scottish Firefighters' Pension Contribution Rate Changes Effective from 1 July 2025

	Actual Pay	Rate										
Band 1	£0 to £35,000	11.73%										
Band 2	£35,001 to £55,000	13.63%										
Band 3	£55,001 to £142,500	14.23%										
Band 4	£142,501 +	15.23%										
	Yield (2025-2027)	13.20%										
Role		WTE Pay (actual pay)	Existing structure			Updated structure			Gross pay		Net Pay	
			Rate	Annually	Monthly	Rate	Annually	Monthly	Annual change	Monthly change	Annual change	Monthly change
Firefighter	Trainee	£28,265	12.90%	£3,646	£304	11.73%	£3,315	£276	-£331	-£28	-£265	-£22
	Development	£29,442	12.90%	£3,798	£317	11.73%	£3,454	£288	-£344	-£29	-£276	-£23
	Competent	£37,675	12.90%	£4,860	£405	13.63%	£5,135	£428	£275	£23	£217	£18
	Competent (0.5 WTE)	£37,675 (£18,838)	12.90%	£2,430	£203	11.73%	£2,210	£184	-£220	-£18	-£176	-£15
Crew Manager	Lowest pay point	£40,041	12.90%	£5,165	£430	13.63%	£5,458	£455	£292	£24	£231	£19
	Highest pay point	£41,767	12.90%	£5,388	£449	13.63%	£5,693	£474	£305	£25	£241	£20
Watch Manager	Lowest pay point	£42,672	12.90%	£5,505	£459	13.63%	£5,816	£485	£312	£26	£246	£21
	Highest pay point	£46,707	12.90%	£6,025	£502	13.63%	£6,366	£531	£341	£28	£269	£22
	Highest pay point (0.5 WTE)	£46,707 (£23,354)	12.90%	£3,013	£251	11.73%	£2,739	£228	-£273	-£23	-£219	-£18
Station Manager	Lowest pay point	£48,580	12.90%	£6,267	£522	13.63%	£6,621	£552	£355	£30	£280	£23
	Highest pay P	£53,586	13.50%	£7,234	£603	13.63%	£7,304	£609	£70	£6	£40	£3
Group Manager	Lowest pay point	£55,953	13.50%	£7,554	£629	14.23%	£7,962	£664	£408	£34	£237	£20
	Highest pay p	£62,028	13.50%	£8,374	£698	14.23%	£8,827	£736	£453	£38	£263	£22
Area Manager	Lowest pay point	£65,690	13.50%	£8,868	£739	14.23%	£9,348	£779	£480	£40	£278	£23
	Highest pay point	£72,054	13.50%	£9,727	£811	14.23%	£10,253	£854	£526	£44	£305	£25

- Rates payable and contribution amounts based on actual pay. This differs from the existing structure where WTE pay is used to determine the rate payable.
- The band rates have all been increased by 0.73% from the existing structure.
- The pay thresholds in each bands have been updated, and are assumed to increase in line with annual pay awards (unlike the current thresholds which do not increase).
- The structure is projected to achieve the member contribution yield of 13.20% over the period 1 April 2025 to 31 March 2027. The bands will also be updated annually in line with pay awards.

Other Options Considered

1.13 Several other options were considered. The first was based on the current tiered structure which has four bands split into WTE salary ranges. Had this option been chosen, with a flat rate increase, the new rates would be as follows:



Table 2: Current Structure with a flat rate increase – maintaining a tiered structure, increasing contribution rates by 0.22%.

Band	Salary Range (Whole Time Equivalent)	Current Member Contribution Rate	Updated Member Contribution Rate	Proportion in each band
Band 1	£0 to £27,818	11.0%	11.22%	0%
Band 2	£27,819 to £51,515	12.9%	13.12%	88%
Band 3	£51,516 to £142,500	13.5%	13.72%	12%
Band 4	£142,501+	14.5%	14.72%	<1%
	Average over 2025 to 2027	12.98%	13.20%	

Role	Annual salary	Existing structure			Updated structure			Gross pay		Net Pay		
		Rate	Annually	Monthly	Rate	Annually	Monthly	Annual change	Monthly change	Annual change	Monthly change	
Firefighter	Trainee	£28,265	12.90%	£3,646	£304	11.49%	£3,248	£271	-£399	-£33	-£319	-£27
	Development	£29,442	12.90%	£3,798	£317	11.49%	£3,383	£282	-£415	-£35	-£332	-£28
	Competent	£37,675	12.90%	£4,860	£405	13.39%	£5,045	£420	£185	£15	£146	£12
Crew Manager	Lowest pay point	£40,041	12.90%	£5,165	£430	13.39%	£5,361	£447	£196	£16	£155	£13
	Highest pay point	£41,767	12.90%	£5,388	£449	13.39%	£5,593	£466	£205	£17	£162	£13
Watch Manager	Lowest pay point	£42,672	12.90%	£5,505	£459	13.39%	£5,714	£476	£209	£17	£165	£14
	Highest pay point	£46,707	12.90%	£6,025	£502	13.39%	£6,254	£521	£229	£19	£181	£15
Station Manager	Lowest pay point	£48,580	12.90%	£6,267	£522	13.39%	£6,505	£542	£238	£20	£188	£16
	Highest pay point	£53,586	13.50%	£7,234	£603	13.39%	£7,175	£598	-£59	-£5	-£34	-£3
Group Manager	Lowest pay point	£55,953	13.50%	£7,554	£629	13.99%	£7,828	£652	£274	£23	£159	£13
	Highest pay point	£62,028	13.50%	£8,374	£698	13.99%	£8,678	£723	£304	£25	£176	£15
Area Manager	Lowest pay point	£65,690	13.50%	£8,868	£739	13.99%	£9,190	£766	£322	£27	£187	£16
	Highest pay point	£72,054	13.50%	£9,727	£811	13.99%	£10,080	£840	£353	£29	£205	£17

Impact on pay (rounded to the nearest £1)

1.14 Alternatively, Table 3 shows the impact of increasing the initial WTE Salary band 1 to £35,000 to include more members. The contribution rates are based on actual pay.

Table 3: Increasing the WTE Salary Range in Band 1 to £35,000

Band	Salary Range (Whole Time Equivalent)	Current Member Contribution Rate	Updated Member Contribution Rate	Proportion in each band
Band 1	£0 to £35,000	11.0%/12.9%	11.49%	13%
Band 2	£35,001 to £55,000	12.9%/13.5%	13.39%	77%
Band 3	£55,001 to £142,500	13.5%	13.99%	10%
Band 4	£142,501+	14.5%	14.99%	<1%
Average over 2025 to 2027		12.98%	13.20%	

Role	Annual salary	Existing structure			Updated structure			Gross pay		Net Pay		
		Rate	Annually	Monthly	Rate	Annually	Monthly	Annual change	Monthly change	Annual change	Monthly change	
Firefighter	Trainee	£28,265	12.90%	£3,646	£304	11.49%	£3,248	£271	£399	£33	£319	£27
	Development	£29,442	12.90%	£3,798	£317	11.49%	£3,383	£282	£415	£35	£332	£28
	Competent	£37,675	12.90%	£4,860	£405	13.39%	£5,045	£420	£185	£15	£146	£12
Crew Manager	Lowest pay point	£40,041	12.90%	£5,165	£430	13.39%	£5,361	£447	£196	£16	£155	£13
	Highest pay point	£41,767	12.90%	£5,388	£449	13.39%	£5,593	£466	£205	£17	£162	£13
Watch Manager	Lowest pay point	£42,672	12.90%	£5,505	£459	13.39%	£5,714	£476	£209	£17	£165	£14
	Highest pay point	£46,707	12.90%	£6,025	£502	13.39%	£6,254	£521	£229	£19	£181	£15
Station Manager	Lowest pay point	£48,580	12.90%	£6,267	£522	13.39%	£6,505	£542	£238	£20	£188	£16
	Highest pay point	£53,586	13.50%	£7,234	£603	13.39%	£7,175	£598	£59	£5	£34	£3
Group Manager	Lowest pay point	£55,953	13.50%	£7,554	£629	13.99%	£7,828	£652	£274	£23	£159	£13
	Highest pay point	£62,028	13.50%	£8,374	£698	13.99%	£8,678	£723	£304	£25	£176	£15
Area Manager	Lowest pay point	£65,690	13.50%	£8,868	£739	13.99%	£9,190	£766	£322	£27	£187	£16
	Highest pay point	£72,054	13.50%	£9,727	£811	13.99%	£10,080	£840	£353	£29	£205	£17

1.15 Table 4 shows the impact of increasing the WTE Salary in Band 1 to £40,000 which would include even more members.

Table 4: Increasing WTE Salary to £40,000

Band	Salary Range (Whole Time Equivalent)	Current Member Contribution Rate	Updated Member Contribution Rate	Proportion in each band
Band 1	£0 to £40,000	11.0%/12.9%	12.23%	52%
Band 2	£40,001 to £55,000	12.9%/13.5%	14.13%	38%
Band 3	£55,001 to £142,500	13.5%	14.73%	10%
Band 4	£142,501+	14.5%	15.73%	<1%
Average over 2025 to 2027		12.98%	13.20%	

Role	Annual salary	Existing structure			Updated structure			Gross pay		Net Pay		
		Rate	Annually	Monthly	Rate	Annually	Monthly	Annual change	Monthly change	Annual change	Monthly change	
Firefighter	Trainee	£28,265	12.90%	£3,646	£304	12.23%	£3,457	£288	£189	£16	£152	£13
	Development	£29,442	12.90%	£3,798	£317	12.23%	£3,601	£300	£197	£16	£158	£13
	Competent	£37,675	12.90%	£4,860	£405	12.23%	£4,608	£384	£252	£21	£199	£17
Crew Manager	Lowest pay point	£40,041	12.90%	£5,165	£430	14.13%	£5,658	£471	£493	£41	£39	£32
	Highest pay point	£41,767	12.90%	£5,388	£449	14.13%	£5,902	£492	£514	£43	£406	£34
Watch Manager	Lowest pay point	£42,672	12.90%	£5,505	£459	14.13%	£6,030	£502	£525	£44	£415	£35
	Highest pay point	£46,707	12.90%	£6,025	£502	14.13%	£6,600	£550	£574	£48	£454	£38
Station Manager	Lowest pay point	£48,580	12.90%	£6,267	£522	14.13%	£6,864	£572	£598	£50	£472	£39
	Highest pay point	£53,586	13.50%	£7,234	£603	14.13%	£7,572	£631	£338	£28	£196	£16



Group Manager	Lowest pay point	£55,953	13.50%	£7,554	£629	14.73%	£8,242	£687	£688	£57	£399	£33
	Highest pay point	£62,028	13.50%	£8,374	£698	14.73%	£9,137	£761	£763	£64	£443	£37
Area Manager	Lowest pay point	£65,690	13.50%	£8,868	£739	14.73%	£9,676	£806	£808	£67	£469	£39
	Highest pay point	£72,054	13.50%	£9,727	£811	14.73%	£10,614	£884	£886	£74	£514	£43

Impact on pay (rounded to the nearest £1)

1.16 Finally, the option set out in Table 5 provides a single flat contribution rate of 13.20%. This is the most straightforward method to deliver the target yield. Whilst this could be considered fairer due to the nature of benefit accrual in a career average pension scheme, those with higher salaries would benefit more through higher tax relief on their pension contributions. This would also significantly increase the contribution rate for lower earners which would likely have a negative impact on scheme participation levels within that cohort.

Table 5: Flat Rate of 13.20% - Single tier structure

Role	Annual salary	Existing structure			Updated structure			Gross pay		Net Pay		
		Rate	Annually	Monthly	Rate	Annually	Monthly	Annual change	Monthly change	Annual change	Monthly change	
Firefighter	Trainee	£28,265	12.90%	£3,646	£304	13.20%	£3,731	£311	£85	£7	£68	£6
	Development	£29,442	12.90%	£3,798	£317	13.20%	£3,886	£324	£88	£7	£71	£6
	Competent	£37,675	12.90%	£4,860	£405	13.20%	£4,973	£414	£113	£9	£89	£7
Crew Manager	Lowest pay point	£40,041	12.90%	£5,165	£430	13.20%	£5,285	£440	£120	£10	£95	£8
	Highest pay point	£41,767	12.90%	£5,388	£449	13.20%	£5,513	£459	£125	£10	£99	£8
Watch Manager	Lowest pay point	£42,672	12.90%	£5,505	£459	13.20%	£5,633	£469	£128	£11	£101	£8
	Highest pay point	£46,707	12.90%	£6,025	£502	13.20%	£6,165	£514	£140	£12	£111	£9
Station Manager	Lowest pay point	£48,580	12.90%	£6,267	£522	13.20%	£6,413	£534	£146	£12	£115	£10
	Highest pay point	£53,586	13.50%	£7,234	£603	13.20%	£7,073	£589	£-161	£-13	£-93	£-8
Group Manager	Lowest pay point	£55,953	13.50%	£7,554	£629	13.20%	£7,386	£615	£-168	£-14	£-97	£-8
	Highest pay point	£62,028	13.50%	£8,374	£698	13.20%	£8,188	£682	£-186	£-16	£-108	£-9
Area Manager	Lowest pay point	£65,690	13.50%	£8,868	£739	13.20%	£8,671	£723	£-197	£-16	£-114	£-10
	Highest pay point	£72,054	13.50%	£9,727	£811	13.20%	£9,511	£793	£-216	£-18	£-125	£-10



Scottish Public
Pensions Agency
Buidheann Peinneanan
Poblach na h-Alba

Impact on pay (rounded to the nearest £1)

Consultation Questions:

Q1. Do you agree to the approach being taken to amend the employee contribution rate - to set contributions in line with actual pay?

Q2. Do you agree to the proposed approach to index contribution bands in line with pay awards commencing 1 July 2025 to ensure the yield continues to be met, avoiding future misalignment? Could the timing of pay awards impact on this proposal?

Q3. Do you agree to the approach being taken to amend the employee contribution rate to maintain a tiered structure in order to meet the required yield of 13.2%?

2. Equality Impact Assessment

2.1 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.

2.2. 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.

2.3. 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.

2.4. The equality duty is an ongoing duty, and we will continue to consider and amend this assessment until the final regulation amendments are laid.