

16 July 2014

Mr P Yeoman
The Pensions Regulator
Napier House
Trafalgar Place
Brighton
BN1 4DW

Dear Mr Yeoman

The Irish National Teachers' Organisation (INTO), is the largest teaching union in Ireland and presently represents around 7000 teachers in all educational sectors in Northern Ireland. INTO has over the past number of years made various interventions and representations on the issue of public sector and teacher pension reform. As such we welcome the opportunity to respond to the consultation exercise given that public sector pensions including teacher pensions are pivotal to ensuring a viable and committed public sector as well as a teaching profession who feel valued and supported.

INTO participated in recent discussions with some of your TPR colleagues on Northern Ireland specific issues and it is very disappointing to note that the consultation documents do not reflect those discussions. In particular the lack of recognition of the fact that public services in Northern Ireland have a much greater density of trade union membership than is the case for England/Wales. Also the issue of the role of the NI Executive Ministers in confirming appointments eg the current provisions for appointment to the NI Executive Ministers in confirming appointments eg the current provisions for appointment to the NILGOSC Board, the single LGPS funded scheme, which was raised with your colleagues, has not even been mentioned.

The current NI consultation and the interim report are highly deficient with regard to Northern Ireland specific matters. In addition the interim report also fails to cover a number of the issues raised in responses made to the TPR by trade unions.

There are some specific points INTO wishes to make. They are as follows:

- Rightly, the interim report records the concerns of a "one size fits all" approach, especially with regard to unfunded and funded schemes.
- Scheme Pension Boards and Advisory Boards should be populated in NI on the employee side by TU nominees. Such nominees work as per health and safety representatives in the interests of the entire scheme membership (active, pensioner and deferred members).

- DSD are to be asked to make the necessary regulations, yet DFP is the responsible department for the Public Service Pensions Act of the NI Assembly. It is DFP officials who are responsible for co-ordination of the engagement with TUS on public service pensions.
- It is not a conflict of interest to be a pension board or advisory board member if you are either a scheme member or a trade union representative of those who are members of the scheme.
- All Pension Board members must exercise fiduciary responsibility to the scheme.
- The draft code of practice makes little reference to the scheme advisory board (SAB) role and responsibilities. INTO is concerned that the purpose of the SAB is undermined by the code having an overwhelming focus on the pension board and scheme manager. The ability for a governance board to take a strategic view of the scheme and advise the responsible authority is an important step in improving the governance of the unfunded schemes in Northern Ireland.

It is the view of INTO and indeed the collective trade union movement in Northern Ireland through the Irish Congress of Trade Unions (ICTU) that independent chairs are not required for the Pension and Scheme Advisory Boards in Northern Ireland. They are an additional and unnecessary expense on the public purse which could be better utilised elsewhere in the public sector. INTO is proposing joint chairs of these boards; one from employers' side and one from the T.U. side. This practice has been in operation within the NILGOSC scheme in Northern Ireland for many years and has proved to work very successfully. INTO is of the view that this practice should be replicated across all the public service pension schemes in Northern Ireland.

We would also request an explicit requirement for pension boards to monitor the accuracy of information provided to members in their annual benefit statements and other pension calculations. It is not sufficient for documents to be provided, there should a process for ensuring that, as far as possible, they are accurate and where they are not, a simple and prompt resolution should be forthcoming. As the number of participating employers in the public sector schemes increases, as will be the case, the number of potential areas for error increases. We believe this is something the code of practice should foresee and provide for accordingly.

Yours sincerely



GERRY MURPHY
Northern Secretary