

Dear Sirs

In relation to the Department for Levelling Up, Housing and Communities consultation on changing the revaluation date from 1 April to 6 April we would like to respond as follows:

1. Do you agree or disagree that the annual revaluation date should change from 1 April to 6 April? Please explain why.

The intention to prevent people from incurring tax liabilities due to the revaluation of their pension is commendable and it is understandable how a change to the revaluation date would be used to implement this policy intent.

However, the short amount of notice of the proposed change means it will be difficult for software providers to modify existing systems to provide a solution and we understand our provider will not be ready in time. This will lead to a significant amount of manual work having to be undertaken at a busy time for LGPS Administration Teams.

Increasing the amount of manual input required, and reducing the options of using tested, automated systems increases the risk of human error impacting outcomes. To mitigate this risk further checks on work will need to be implemented, putting a further drain on available resources.

As the end of the financial year approaches, consideration has already been given to how existing resources should be utilised to cover the range of activities that need to be achieved. Adding to the work that needs to be undertaken at such short notice means the resources will need to be redistributed, putting tasks at risk of not being completed to the necessary standard by the relevant deadlines. We will also not be able to obtain additional staff to cover the extra work required.

It would have been preferred if either greater notice of this intent had been provided or alternatives measures considered to achieve the policy goal.

2. Do you agree that the policy aim for regulation 21 is delivered through the draft regulations?

Yes – due to the short period of the consultation there has been a limited opportunity to review the proposed regulations in detail or to obtain input from legal advisers

3. Do you agree that the policy aim for regulation 23 is delivered through the draft regulations?

Yes – due to the short period of the consultation there has been a limited opportunity to review the proposed regulations in detail or to obtain input from legal advisers

4. Do you agree that the policy aim for regulations 24 and 25 is delivered through the draft regulations?

Yes – due to the short period of the consultation there has been a limited opportunity to review the proposed regulations in detail or to obtain input from legal advisers

5. Do you agree that the policy aim for regulation 27 is delivered through the draft regulations?

Yes – due to the short period of the consultation there has been a limited opportunity to review the proposed regulations in detail or to obtain input from legal advisers

6. Do you agree that the policy aim for regulations 41, 42, 44, 45, 47 and 48 is delivered through the draft regulations?

Yes – due to the short period of the consultation there has been a limited opportunity to review the proposed regulations in detail or to obtain input from legal advisers

7. Do you agree that the policy aim for regulation 43 and 46 is delivered through the draft regulations?

Yes – due to the short period of the consultation there has been a limited opportunity to review the proposed regulations in detail or to obtain input from legal advisers

8. Do you agree that amending the definition of “revaluation adjustment” and the new definition of “revaluation date” in Schedule 1 delivers the policy aim?

Yes – due to the short period of the consultation there has been a limited opportunity to review the proposed regulations in detail or to obtain input from legal advisers

9. Are there any further considerations and evidence that you think DLUHC should take into account when assessing any equality issues or adverse impacts arising as a result of the proposed changes? Please explain and provide evidence where appropriate.

No - please see our answer to question 1, which covers our concerns about the timing of this consultation and the proposed changes.

Kind regards

Michael Burton
Pensions Manager – Governance and Compliance
East Sussex Pension Fund