

HSC Pension Scheme – proposed amendments to scheme regulations

Consultation Document & Explanatory Notes

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Introduction

The Department of Health is consulting on amendments to the Regulations that provide the rules for the HSC Pension Schemes.

There are two HSC Pension Schemes: the reformed 2015 scheme and the older, closed scheme which is divided into the 1995 and 2008 sections. Accordingly, there are three sets of regulations under which entitlement to pension and other benefits are calculated:

- The Health and Personal Social Services (Superannuation) Regulations (Northern Ireland) 1995 (S.R. 1995 No.95)
- The Health and Social Care (Pension Scheme) Regulations (Northern Ireland) 2008 (S.R. 2008 No.256)
- The Health and Social Care Pension Scheme Regulations (Northern Ireland) 2015 S.R. 2015 No.120).

These are referred to collectively in this document as the 'Pension Scheme Regulations'.

In summary, the proposals amend the above mentioned Regulations to:

- align the timing of CPI inflation rates used for revaluing pension benefits and the annual allowance tax calculation
- update contribution tiers in line with AfC pay award and introduce technical updates to member contribution provisions
- make technical corrections and refinements to improve the operation of scheme Regulations

Draft Regulations are not attached to this document due to time constraints.

The Department welcomes views on the proposals set out in this document.

Consultation questions

The Department welcomes any comments or views on the proposals set out in this document. Respondents are invited to consider the following questions:

1. Do you agree or disagree that the changes to the pension rules regarding inflation should be implemented as proposed in this consultation document? If you disagree, please explain why.
2. Do you agree or disagree that the changes to member contributions provisions should be implemented as proposed in this consultation document? If you disagree, please explain why.
3. Do you agree or disagree with the technical corrections proposed? If you disagree, please explain why.
4. Are there any additional comments you wish to provide with regard to the proposed amendments?
5. Are there any considerations and evidence that you think the Department should take into account when assessing any equality issues arising as a result of the proposed changes?

How to respond

Comments on the proposals and draft legislation can be submitted using the consultation response document (see Annex A) to:

modernisation@health-ni.gov.uk

or by post:

DoH Pensions Policy Team
Waterside House
Room G33
75 Duke Street
Londonderry
BT47 6FP

Please use email if possible as mail will only be monitored periodically.

The consultation will close on 17 February 2023

Confidentiality of information

For this consultation, we may publish all responses except for those where the respondent indicates that they are an individual acting in a private capacity (e.g. a member of the public). All responses from organisations and individuals responding in a professional capacity will be published. We will remove email addresses and telephone numbers from these responses; but apart from this, we will publish them in full. For more information about what we do with personal data please see our consultation privacy notice.

Your response, and all other responses to this consultation, may also be disclosed on request in accordance with the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR); however all disclosures will be in line with the requirements of the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UK GDPR) (EU) 2016/679.

If you want the information that you provide to be treated as confidential it would be helpful if you could explain to us why you regard the information you have provided as confidential, so that this may be considered if the Department should receive a request for the information under the FOIA or EIR

Changes to the pension rules regarding inflation

Background

The rapid increase in Consumer Price Index (CPI) inflation has shown there to be a timing mismatch between the CPI rate that is used to revalue accrued benefits in the HSC Pension Scheme and the CPI rate that is allowed for in annual allowance (AA) tax calculations. Aligning these timings will ensure that the AA measures only the pension growth that occurs above inflation.

Pension benefits in the 2015 Scheme

The amount of pension a 2015 Scheme member earns each year is determined by what is known as the 'build-up rate'. In the 2015 Scheme the build-up rate is 1/54th, so members earn a pension of 1/54th of their pensionable earnings each scheme year. For active members of the 2015 Scheme the pension they earn is increased yearly by a percentage rate, known as 'in-service revaluation'. This continues to occur yearly until a member retires or ends their active membership of the 2015 Scheme before retirement.

The percentage rate of in-service revaluation is determined by a yearly Public Service Pensions Revaluation Order (Northern Ireland), plus an additional 1.5%. This is the method by which Department of Finance notifies the value of the CPI change to be applied as part of the in-service revaluation. The pension earned in a scheme year, 1 April to 31 March, is added to the aggregate pension earned in previous scheme years and increased by the in-service revaluation rate. The in-service revaluation rate may go up, remain the same or even go down and be a negative amount. If a member leaves the 2015 Scheme before 31 March, they become entitled to a proportion of the in-service revaluation after 31 March. The proportion is dependent on how far through the scheme year the member left the scheme.

If a member leaves the 2015 Scheme to retire, the in-service revaluation stops, they receive a proportion of the in-service revaluation after 31 March and while in payment the 2015 Scheme pension increases yearly by the 'pensions increase rate', determined by the yearly Public Service Pensions Revaluation Order (Northern Ireland). The pensions increase is used to maintain the value of public service pensions against rises in the cost of living. If the CPI is a negative amount, the pensions increase is zero.

Members who leave the 2015 Scheme but who have not yet retired receive a proportion of the in-service revaluation after 31 March and, following this, have their deferred 2015 Scheme pension increased yearly by the pensions increase rate.

Pension benefits for practitioners in the 1995/2008 Scheme

Pension benefits in the 1995/2008 Scheme for medical, dental and ophthalmic practitioners, as a group referred to as 'practitioners', are calculated as using a career average revalued earnings (CARE) method. Practitioner pensionable earnings, for each

scheme year a practitioner is an active member, are updated using a factor known as the 'dynamising factor'. Practitioner pensionable earnings are multiplied by the relevant dynamising factor yearly. The practitioner pension accrual rate is then 1.4% in the 1995 Section and 1.87% in the 2008 Section, of the total updated practitioner pensionable earnings amount.

Practitioner pensionable earnings earned up to the closure of the 1995/2008 Scheme on 31 March 2022 – and if appropriate a practitioner pensionable earnings credit in respect of any added years being purchased – are updated yearly using dynamising factors aligned to the pensions increase, the CPI rate used to increase HSC pensions in payment, plus an additional 1.5%. The 1995/2008 Scheme closed on 31 March 2022 and all practitioners were moved to the 2015 Scheme. As a result, the uprating continues for as long as the practitioner remains an active member of the 2015 Scheme. The percentage rate of CPI, to be added to the additional 1.5% to determine the dynamising factors, is confirmed in the yearly Pensions Increase (Review) Order (Northern Ireland) by the Department of Finance.

The annual allowance

The annual allowance (AA) is the maximum amount of pension savings an individual can make in any one tax year, from 6 April to 5 April, that benefit from tax relief. The standard AA limit is currently £40,000. However, the limit can be tapered down to a lower AA for very high earners.

The growth in pension savings during a tax year is referred to as the pension input amount (PIA). The PIA is based on how much the value of the individual's accrued pension has gone up from the 'opening value' immediately before the start of the tax year to the 'closing value' at the end of the tax year. If an individual's PIA is more than their AA, the individual may be liable to pay tax on the amount that is over their AA.

The intention is that the PIA should only consider growth in pension savings above inflation and so the opening value is uplifted by the CPI, from the previous September, in the calculation of the PIA.

CPI disparity

The 2015 Scheme in-service revaluation and the calculation of the PIA both use CPI. However, there is a disparity between the CPI used for the in-service revaluation of the 2015 Scheme pension and the CPI used to increase the opening value, as part of the calculation to determine the PIA.

The Public Service Pensions Revaluation Order (Northern Ireland) has come into force on 1 April each year since the introduction of the 2015 Scheme. This means that the 2015 Scheme earned pension up to 31 March was revalued on 1 April. In contrast, the opening value of 2015 Scheme pension on 5 April is increased by an earlier September's CPI percentage rate.

The issue for practitioners with CARE benefits in the 1995/2008 Scheme is similar to the issue for practitioners and other members with CARE pensions in the 2015 Scheme. Dynamising factors are currently applied to practitioner pensionable earnings on 1 April. In

contrast, the opening value of 1995/2008 Scheme benefits is uplifted by an earlier September's CPI amount.

Effectively there is a one year CPI disparity for both the uprating of 1995/2008 Scheme pensionable practitioner earnings, and the in-service revaluation of the 2015 Scheme earned pension. Recent higher inflation means that this mismatch has become more acute, leading to more members being potentially at risk of breaching their annual allowance.

For the 2022 to 2023 tax year, the September 2022 CPI of 10.1% is higher than it has been in recent years. This higher CPI will lead to high in-service revaluation of 2015 Scheme earned pension up to 31 March 2023. However, the CPI increase to the opening value of HSC Pension Scheme pension in the PIA calculation is based on the lower value of CPI in September 2021 of 3.1%. This increases the risk of annual allowance tax charges for 1995/2008 Scheme practitioners and 2015 Scheme members for tax year 2022 to 2023 as a result of the higher inflation.

Proposed changes to the 2015 Regulations

The Department is proposing to move the date that the yearly in-service revaluation is applied to 2015 Scheme earned pension from 1 April to 6 April, from 6 April 2023.

This will align the CPI used in both these calculations with the CPI used in the increase of the opening value of 2015 Scheme pension benefits, for determining the PIA. Moving the date by 5 days means that the same CPI percentage rate is used, meaning that the PIA calculation will only consider growth in pension savings of above inflation.

The Department of Finance is proposing to make changes to the Public Service Pensions Revaluation Order (Northern Ireland) 2023 to move the revaluation date and align the CPI rates for the 2015 Scheme. The amendments we are proposing to make to the 2015 Regulations will be to facilitate the correct application of this, and future, Department of Finance Orders.

Therefore, we propose that minor amendments to the 2015 Regulations are solely focused on the schedule 7 interpretations of: 'index adjustment', 'AP index adjustment', 'leaver index adjustment' and 'leaver AP index adjustment', as well a minor amendment in regulation 105, regarding the definition of 're-valued pensionable earnings'.

The 1995 Regulations and the 2008 Regulations

The Department is proposing to move the date that dynamising factors are applied to 1995/2008 Scheme practitioner pensionable earnings yearly from 1 April to 6 April, from 6 April 2023.

The process by which the uprate is applied to the 1995/2008 Scheme is set out in: paragraph 11 of schedule 2 of the 1995 Regulations; and regulation 176 of Chapter 4, Part 3, of the 2008 Regulations. Both the 1995 Regulations and the 2008 Regulations draw on the Pensions (Increase) Act (Northern Ireland) 1971 and the Social Security Pensions (Northern Ireland) Order 1975, for an explanation as to how the CPI annual increase figure is defined. As the 1995 Regulations and the 2008 Regulations do not set a specific date on

which the dynamising factors need to be applied, there is no requirement to change either the 1995 Regulations or the 2008 Regulations to implement this proposal.

Benefits of changing the scheme rules regarding inflation

Changing the revaluation date by 5 days, from 1 April to 6 April, aligns the rate of CPI used in the CARE revaluation in the HSC Pension Scheme and the pension benefit growth calculation, for AA purposes. This ensures that the AA operates as intended in relation to HSC pensions, and the high inflation environment does not create larger tax charges for senior clinicians on the pension earned this year. Consequently, from tax year 2022 to 2023 onwards, the calculation to determine the PIA will properly measure growth above inflation in the HSC Pension Scheme.

For members unaffected by the AA, the proposed change will have no effect on the amount of HSC pension benefits they are entitled to on retirement.

Changes to contribution tiers in line with Agenda for Change (AfC) pay award

Background

In the Health and Social Care Pension Scheme (Member Contributions) (Amendment) Regulations (Northern Ireland) 2022 (the “First Amending Regulations”), the Department made various changes to the member contribution structure which came into force on 1 November 2022. Those changes were to:

- Change members contribution rates so that they would be based on actual pensionable pay instead of members’ notional whole-time equivalent pay
- Amend the structure for members contributions and the amount of member contributions payable by different cohorts of members
- Amend the regulations so that the member contribution tier thresholds would be based around the AfC pay scales and could be annually increased in line with AfC pay awards
- Bring in the first phase of the changes to the member contribution structure, with a further phase to follow.

As explained in the original [consultation document](#), in order to annually increase the contribution tier thresholds in line with AfC pay award, further changes need to be made to regulations.

Proposed increases to the member contribution structure thresholds

Following details of the 2022/23 AfC pay award for Northern Ireland, work has been carried out to uplift the member contribution thresholds.

Employed members active in the scheme before the beginning of a scheme year generally have their contribution rate assessed using pensionable earnings received during that preceding year. If a member started a new job or their contribution rate changed during that preceding year, pensionable earnings from the date of change are used to determine the member's band. Such earnings are increased so they are representative of a full year. Likewise, if a member changes jobs or has a pay increase during a current scheme year their contribution rate is reassessed. New earnings increased to represent a full year are used to see if those earnings fall into a different band and therefore a different percentage rate should apply from the date of change to the end of the scheme year.

The First Amending Regulations amended Regulation 30 of the Health and Social Care Pension Regulations (Northern Ireland) 2015 (the "2015 Regulations") to introduce 2 contribution rate tables. The first table at Regulation 30 (3) sets out contribution rates for members who have their rate based on their previous year's pensionable pay. The second table at Regulation 30 (3A) sets out contribution rates for members who have their rate based on their current earnings. As the 2022/23 pay award is being made close to the end of the scheme year it is proposed to split both tables in order to provide updated tables for 2022/23 and also the opening position for 2023/24. At present all tables will be the same but the second table will be amended again once a pay award for 2023/24 is made.

Table 1: member contribution structure for 2022/23 (from 1 November 2022) and 2023/24 for members whose contribution rate is based on their previous year's pensionable pay

2022/23			2023/24		
Tier	Pensionable earnings band	Contribution percentage rate from 1 November 2022	Tier	Pensionable earnings band	Contribution percentage rate from 1 November 2022
1	Up to £13,246	5.1%	1	Up to £13,246	5.1%
2	£13,247 to £16,831	5.7%	2	£13,247 to £16,831	5.7%

3	£16,832 to £22,878	6.1%	3	£16,832 to £22,878	6.1%
4	£22,879 to £23,948	6.8%	4	£22,879 to £23,948	6.8%
5	£23,949 to £28,223	7.7%	5	£23,949 to £28,223	7.7%
6	£28,224 to £29,179	8.8%	6	£28,224 to £29,179	8.8%
7	£29,180 to £43,805	9.8%	7	£29,180 to £43,805	9.8%
8	£43,806 to £49,245	10.0%	8	£43,806 to £49,245	10.0%
9	£49,246 to £56,163	11.6%	9	£49,246 to £56,163	11.6%
10	£56,164 to £72,030	12.5%	10	£56,164 to £72,030	12.5%
11	£72,031 and above	13.5%	11	£72,031 and above	13.5%

The second table (for members who have their contribution rate based on current pensionable earnings) needs to be updated now that the AfC pay award for Northern Ireland has been announced.

We propose that the member contribution structure for members who have their contribution rate based on current pensionable earnings will be as set out in table 2. This will be updated once the 2023/24 pay award is known.

Table 2: member contribution structure for 2022/23 (from 1 November 2022) and 2023/24 for members whose contribution rate is based on their current (in-year) pensionable pay

2022/23			2023/24		
Tier	Pensionable earnings band	Contribution percentage rate from 1 November 2022	Tier	Pensionable earnings band	Contribution percentage rate from 1 November 2022
1	Up to £13,246	5.1%	1	Up to £13,246	5.1%
2	£13,247 to £16,831	5.7%	2	£13,247 to £16,831	5.7%
3	£16,832 to £22,878	6.1%	3	£16,832 to £22,878	6.1%
4	£22,879 to £23,948	6.8%	4	£22,879 to £23,948	6.8%
5	£23,949 to £28,223	7.7%	5	£23,949 to £28,223	7.7%
6	£28,224 to £29,179	8.8%	6	£28,224 to £29,179	8.8%
7	£29,180 to £43,805	9.8%	7	£29,180 to £43,805	9.8%
8	£43,806 to £49,245	10.0%	8	£43,806 to £49,245	10.0%

9	£49,246 to £56,163	11.6%	9	£49,246 to £56,163	11.6%
10	£56,164 to £72,030	12.5%	10	£56,164 to £72,030	12.5%
11	£72,031 and above	13.5%	11	£72,031 and above	13.5%

Most thresholds have been increased by £1,400, in order to align with the AfC pay deal. The upper limit of Tier 1 has however been maintained with a slight correction to £13,246. This is intended to support the affordability of the HSC Pension Scheme for members who are earning less than the threshold at the bottom of Tier 2. These members will all work less than full-time hours and are unlikely to receive income tax relief on their pension contributions if their HSC role is their only source of income, which may reduce the affordability of the HSC Pension Scheme for the very lowest earners. Consequently, the consultation proposes to keep this threshold frozen and not increase it in line with the AfC pay award. The lower threshold for tier 8 reflects the mid-point in band 7 of AfC (2 to 5 years' experience). In Northern Ireland, the pay award for this pay band has a 4% underpin and is therefore uplifted by £1,684.84. Consequently, the new threshold would be £43,805.84. However, the thresholds in the member contribution structure are all whole numbers so it was proposed that the threshold should be rounded up to £43,806.

Practitioners and non-GP providers

In addition to the uplifts to their pensionable earnings bands, some technical updates are required to ensure that practitioners have paid the correct amount of member contributions for the 2022 to 2023 scheme year.

Updates to practitioner reconciliation process

Unlike officer members, all practitioners have their contribution rate based on in-year, annualised pay. This is the same as the process before the changes that came into force on 1 November 2022. Following the end of the scheme year, relevant practitioners (for example, GP providers and salaried GPs), must declare their final pensionable earnings within 11 months of the end of the scheme year.

Given that the changes came into force on 1 November 2022, part way through the 2022/23 scheme year, there are some regulatory changes required to the reconciliation process used by practitioners at the end of the scheme year.

The Department proposes to make amendments to the 2015 Regulations to allow practitioners to apportion their earnings so that they pay contributions in accordance with the member contribution structure that was in place at the time their pensionable earnings were earned.

The contribution structure that was in force until 31 October 2022 is shown in table 1 below.

Table 1: member contribution structure between 1 April 2015 and 31 October 2022

Tier	Pensionable earnings (WTE)	Contribution rate
1	Up to £15,431	5.0%
2	£15,432 to £21,477	5.6%
3	£21,478 to £26,823	7.1%
4	£26,824 to £47,845	9.3%
5	£47,846 to £70,630	12.5%
6	£70,631 to £111,376	13.5%
7	£111,377 and above	14.5%

WTE – whole time equivalent

The contribution structure that came into force on 1 November 2022 (including uplifts for the recent pay award) is shown in table 2 below.

Table 2: member contribution structure from 1 November 2022

Tier	Pensionable earnings (rounded down to the nearest pound)	Contribution rate from 1 November 2022
1	Up to £13,246	5.1%
2	£13,247 to £16,831	5.7%

3	£16,832 to £22,878	6.1%
4	£22,879 to £23,948	6.8%
5	£23,949 to £28,223	7.7%
6	£28,224 to £29,179	8.8%
7	£29,180 to £43,805	9.8%
8	£43,806 to £49,245	10.0%
9	£49,246 to £56,163	11.6%
10	£56,164 to £72,030	12.5%
11	£72,031 and above	13.5%

Under the 2015 Regulations, practitioners are required to pay contributions at the rate specified in the relevant table in regulation 31 that corresponds with their certified or final pensionable earnings. If they are not required to certify their pensionable earnings then their contribution rate is based on their pensionable earnings for that year. There are also supplementary provisions in regulations 37 and 38 of the 2015 Regulations for calculating member contributions for medical practitioners, non-GP providers and dental practitioners as part of the reconciliation process.

Currently, the formulae in regulations 37 and 38 require practitioners to annualise their pensionable earnings for the relevant scheme year and apply the appropriate contribution rate in regulation 31. However, these formulae operate on the basis that there is only one member contribution rate table applicable to the relevant scheme year. Therefore, to ensure that practitioners pay the correct contribution rate for their pensionable earnings during the scheme year 2022 to 2023, the formulae in regulations 37 and 38 will need to be updated to ensure that the contribution rates shown in table 1 above apply to practitioner pensionable earnings during the period 1 April 2022 and 31 October 2022 and the contribution rates shown in table 2 apply from 1 November 2022 to 31 March 2023.

It is intended that the Regulations will provide a split table for 2022 to reflect the mid-year rate change that came into force on 1 November 2022.

Most practitioners, including type 2 practitioners (salaried GPs), locum GPs, dental practitioners and ophthalmologists, will be able to accurately identify which month during scheme year 2022 to 2023 their pensionable earnings relate to and therefore can apply the contribution rate that corresponds to that period. Therefore, we propose to modify the provisions in regulation 37 to enable the correct rate to be applied for each relevant period. For example, a salaried GP who is employed throughout the whole of the 2022 to 2023 scheme year on a salary of £120,000, will pay member contributions at a rate of 14.5% on their earnings between 1 April 2022 and 31 October 2022. From 1 November 2022, they will pay 13.5% on their earnings.

The end of scheme year reconciliation process for type 1 practitioners (GP providers) will operate slightly differently because the nature of their pensionable profits means that it would be administratively unrealistic to be able to accurately apportion exactly when in the year those pensionable profits were earned.

We therefore propose to insert a new formula to enable type 1 practitioners to apportion their annual pensionable earnings for each relevant period with reference to the number of days worked during each period. Members will then pay contributions based on the apportioned earnings at the rates specified for each relevant period (table 2 between 1 April 2022 and 31 October 2022, and table 3 between 1 November 2022 and 31 March 2023).

Example

At the end of the 2022 to 2023 scheme year, a type 1 practitioner calculates that they received pensionable profits of £115,000 over the year. They were a type 1 practitioner throughout the year and because they are a type 1 practitioner they cannot accurately calculate when the pensionable profits were earned within the year.

The practitioner will pay member contributions of 14.5% on the proportion of their pensionable income earned between 1 April 2022 and 31 October 2022, based on the previous contribution rate table.

The period of 1 April to 31 October is 214 days, so the calculation would be $£115,000 / 365 \times 214 = £67,424.66$. Therefore, the practitioner pays 14.5% member contributions on £67,424.66. On the remaining 151 days between 1 November 2022 and 31 March 2023, their pensionable earnings will be £47,575.34 and they will pay contributions at a rate of 13.5%.

If a practitioner only became a type 1 practitioner part-way through the year (or retired part-way through the year) then the calculation needs to be adjusted.

Example

A member joins a GP partnership as a type 1 practitioner on 1 September 2022 and their share of the pensionable profits for the 2022 to 2023 scheme year is £70,000.

Firstly, their pensionable profits for the full year and the annualised amount will be used to find the appropriate contribution rate. Annualising the pensionable profits gives a sum of £120,519 ($£70,000 / 212 \times 365 = £120,519$). This means that the rate for the period between April and October will be 14.5% and the rate for the period between November and March is 13.5%.

Secondly, the pensionable profits for each period will need to be calculated. Given that the member joined the partnership on 1 September 2022, they were a GP provider for 61 days in the April to October period. They were a GP provider for 212 days in the 2022 to 2023 scheme year.

This means that their pensionable profits for the April to October period will be calculated as £20,141.51 ($£70,000 / 212 \times 61 = £20,141.51$). The rate for this period is 14.5% (based on annualised earnings of £120,519), making the payable contributions £2,872.64.

The remainder of the pensionable profits (£49,858.49) is therefore deemed to have been earned in the November to March period ($£70,000 / 212 \times 151 = £49,858.49$). The rate for this period is 13.5% (based on annualised earnings of £120,519), making the payable contributions £6,779.20.

Finally, the 2 sums should be added together to find the total amount of contributions that are payable for the 2022 to 2023 scheme year (in respect of the member's pensionable profits from this role). For this practitioner, their member contributions would be £9,651.84.

Any return of contributions or payment of underpaid contributions, will be determined at the end of the scheme year, following the established current process.

A practitioner who also has an officer post will have the contribution rate for their officer post determined separately to their practitioner post.

Minor and technical amendments

Amendments are required to the Health and Social Care Pension Scheme Regulations (Northern Ireland) 2015 so that references to the Regional Health and Social Care Board will be replaced by references to the Department of Health.

Amendments are required to the Health and Personal Social Services (Superannuation) Regulations (Northern Ireland) 1995, the Health and Social Care (Pension Scheme) Regulations (Northern Ireland) 2008 and the Health and Social Care Pension Scheme Regulations (Northern Ireland) 2015 regulations to include shared parental leave under reasons of absence from work to provide an entitlement for a mother/adopter and a child's father/adopter or a mother's or adopter's partner to take shared parental leave without an impact on their pension.

Equality Impact Assessment

Section 75 of the Northern Ireland Act 1998 requires all public authorities in carrying out their functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity:-

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependents and persons without.

The Department's Equality Screening Exercise initial conclusion has determined that the proposed changes do not differentially impact on any of the Section 75 groups. However, the Department would like to take this opportunity to ask stakeholders the following question in relation to equality:-

Are there any considerations and evidence that you think the Department should take into account when assessing any equality issues arising as a result of the proposed changes?

The equality screening analysis will be reviewed based on responses received during the consultation.

CONSULTATION RESPONSE FORM
CONSULTATION

HSC Pension Scheme – proposed amendments to scheme regulations

(Please complete and return to the address at the end of the form to ensure that we handle your response appropriately).

1. Name/Organisation

Organisation Name
Title
Surname
Forename

2. Postal Address

Postcode Phone
Email

3. Permissions - I am responding as... (Please complete either sections (a), (b) and (d) or sections (c) and (d):

Individual or Group/Organisation

(a) Do you agree to your response being made available to the public... Please state yes or no: _____
(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis Please state yes to one of the following:
Yes, make my response, name and address all available
or
Yes, make my response available, but not my name and address
or
Yes, make my response and name available, but not my address

(c) The name and address of your organisation will be made available to the public (in the Assembly library and/or on the Assembly web site).
Are you content for your response to be made available?
Please state yes or no:

(d) We may share your response internally with other Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Department of Health to contact you again in relation to this consultation exercise?
Please state yes or no:

ABOUT YOU

I am responding ...

- as a scheme member
- on behalf of an Employer Organisation
- on behalf of a Trade Union/Staff Association
- other (please specify)

What is your gender?

- Female
- Male
- Other
- Do not wish to say

I am employed as...

- an administrator
- a dentist
- a doctor
- a general practitioner
- a junior doctor
- a manager
- a nurse
- I'm retired
- other (please specify)

What is your working pattern?

I work part-time

I work full- time	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>

CONSULTATION COMMENTS

Please use this space to provide any comments on the amendments.

Comments:

Please e-mail your response to modernisation@health-ni.gov.uk or post to:

DoH – Pension Policy Team
Room G33
Waterside House

75 Duke Street
Londonderry BT47 6FP

The closing date for receipt of comments is 17 February 2023.