

**EXPLANATORY MEMORANDUM TO
THE LOCAL GOVERNMENT PENSION SCHEME (MISCELLANEOUS)
REGULATIONS 2010**

2010 No. 2090

1. This explanatory memorandum has been prepared by the Department for Communities and Local Government (“CLG”) and is laid before Parliament by Command of Her Majesty.

2. Purpose of the instrument

2.1 These Regulations amend the following instruments:

The Local Government Pension Scheme Regulations 1997/1612 (“the 1997 Regulations”);

The Local Government Pension Scheme (Benefits, Membership and Contributions) Regulations 2007/1166 (“the Benefits Regulations”);

The Local Government Pension Scheme (Transitional Provisions) Regulations 2008/238 (“the Transitional Regulations”) and

The Local Government Pension Scheme (Administration) Regulations 2008/239 (“the Administration Regulations”).

3. Matters of special interest to the Joint Committee on Statutory Instruments

3.1 The amendments contained in regulations 7, 9 and 10, 12 to 14(a), 16 to 18, 24, 31, 34 to 36 and 50 have retrospective effect from 1 April 2008. The amendments contained in regulations 25, 27 and 48 have retrospective effect from 1 October 2008. The amendment contained in regulation 41 has retrospective effect from 1 April 2009. The amendments contained in regulations 3 and 4 have retrospective effect from 6 April 2009, and the amendment contained in regulation 49 has retrospective effect from 31 December 2009. Sections 12 and 24 of the Superannuation Act 1972 (c.11) enable regulations for the superannuation of persons employed in local government service to be framed so as to have effect as from a date earlier than the making of the regulations.

3.2 The reasons for the use of retrospective powers are explained in paragraph 7.

4. Legislative context

4.1 On 1 April 2008 the new Local Government Pension Scheme (“the 2008 Scheme”) was introduced and replaced the earlier arrangements constituted under the Local Government Pension Scheme Regulations 1997 (“the 1997 Scheme”). The 2008 Scheme is constituted by the Benefits Regulations and the Administration Regulations. The Transitional Regulations revoke most but not all of the provisions of the 1997 Scheme and deal with continuity between the earlier arrangements and the

2008 Scheme. The parts of the 1997 Regulations which are continued in effect by the Transitional Regulations make specified provision regarding the benefits of certain members.

5. Territorial Extent and Application

5.1 This instrument applies to England and Wales.

6. European Convention on Human Rights

6.1 As the instrument is subject to negative resolution procedure and does not amend primary legislation, no statement is required.

7. Policy background

7.1 This amending instrument makes some reforms to the 1997 and 2008 Schemes and is part of the ongoing programme of modernisation of the Local Government Pension Scheme (“LGPS”) to which CLG is committed. Many of the amendments are at the suggestion of our business partners (see Annex A).

Regulation 3 : Pension credit members – 1997 Regulations 154

7.2 This amendment extends the rights of individuals who have been awarded a share of retirement benefit following their divorce from a member of the LGPS. Such pension credit members have only been able to receive their benefits at age 65, but the amendment provides for benefits to be taken at any time from age 60 onward that the member chooses. An appropriate actuarial reduction would be applied to benefits taken before age 65. This amendment, together with the related regulation 4, is backdated to 6 April 2009, as that is the date on which amendments made by the Occupational, Personal and Stakeholder Pensions (Miscellaneous Amendments) Regulations 2009 (S.I. 2009/615) to the Pension Sharing (Pension Credit Benefit) Regulations 2000 (S.I. 2000/1054) gave effect to a general relaxation in the rules relating to pension credit members.

Regulation 4 : Death grants – 1997 Regulations 155

7.3 This is a technical amendment, necessitated by the increasing variation in the point at which pension credit members will take their retirement benefits, which means that the reference to “normal benefit age” is no longer appropriate.

Regulations 6 and 33: Definitions – Benefits Regulations 1 and Transitional Regulations 1

7.4 The policy aim of these minor technical amendments is to provide consistency in the definition of certain terms used in the Scheme Regulations. For example the term “local government employment” appears several times throughout the Benefits Regulations but is not defined. This amendment adopts the definition which is used in the Administration Regulations and the term covers all employment with employers defined by virtue of Schedule 2 of those Regulations.

Regulation 7: Active membership – Benefits Regulations 2

7.5 This is an amendment, requested by business partners, to correct any impression that members have to remain continuously in LGPS membership in order to remain eligible. This amendment is backdated to 1 April 2008 in order to confirm the original policy intention of this provision.

Regulation 8: Contributions payable by active membership – Benefits Regulations 3

7.6 This amending Regulation makes four minor alterations to payment processes. The first two make technical improvements to the methodology used to change the various contribution rates for active members of the Scheme. The third alteration precludes the possibility of members making contributions from the day before their 75th birthday onward, whilst the fourth deletes the provision for administering authorities to decide the intervals at which contributions are made as it would not be equitable for them to have such a power.

Regulation 9: Meaning of pensionable pay – Benefits Regulations 4

7.7 Last year an additional exclusion was introduced into the definition of “pensionable pay”, namely compensation awarded in order to achieve equal pay (S.I. 2009/3150). This amendment clarifies that compensation in these circumstances excludes sums which amount to arrears of pay (all arrears of pay are pensionable). This amendment is backdated to 1 April 2008 because last year’s amendment was similarly backdated.

Regulation 10: Calculation of period lengths of membership – Benefits Regulations 7

7.8 This amendment is necessary to make it clear that, in determining whether a part-time member has total membership of at least three months, entitling him to benefit, the calendar period should be used, not *pro-rata* time. This amendment is backdated to 1 April 2008 in order to confirm the original policy intention of this provision.

Regulation 11: Final pay: fees – Benefits Regulations 11

7.9 As requested by business partners, this substituted provision clarifies the effect of fees paid to variable-time officers, whose pay consists of such fees either wholly or in part. The amendment instructs how fees should be treated as regards their effect on the figure for officers’ final pay in cases where they have been paid fees for less than three years.

Regulations 12 – 14: Active members – Benefits Regulations 13 – 14A

7.10 These amendments make it clear that only those members who are still in employment may purchase or be awarded additional pension. Regulation 14 also removes an ineffective provision concerning the conversion of amounts paid by way of additional survivor benefit contributions into ordinary pension. Regulations 12, 13 and regulation 14(a) are backdated to 1 April 2008 because they make clarifications that should have been included in the Benefits Regulations at the outset.

Regulation 15: Elections to pay AVCs – Benefits Regulations 15

7.11 This is a minor amendment made in order to ensure consistency between the Benefits Regulations and the Administration Regulations.

Regulations 16 -18: Enhancement of retirement benefits – Benefits Regulations 16-18

7.12 The policy aim of this amendment is to ensure that members who leave service with immediate entitlement to benefits under regulation 16, but who choose not to receive payment immediately, are entitled to actuarial increase of their benefits when they finally wish to receive them. Similarly, it is made clear that members who join after the normal retirement date or who take flexible retirement at age 65 onward are also entitled to suitable enhancements. These amendments are backdated to 1 April 2008 in order to confirm the original policy intention of these provisions.

Regulation 19: Early leavers: Ill-health – Regulation 20 of the Benefits Regulations

7.13 Regulation 20 of the Benefits Regulations sets out the eligibility criteria for the release of retirement benefits on the grounds of ill health. Experience of the practical application of the ill health regime since its introduction in April 2008, means some amendments are needed to clarify some of the provisions and make some modifications to the ill health framework.

7.14 In particular, a change has been made to the terms of the eligibility criteria by replacing the term ‘obtaining any gainful employment’ with the term ‘capable of undertaking any gainful employment’. The word ‘obtaining’ has been replaced with ‘undertaking’ where mentioned in regulation 20. The change is necessary because Independent Registered Medical Practitioners (IRMPs) consider that the former wording was seeking an opinion beyond their professional competence which was not the intention of the regulations.

7.15 The ill-health provisions allow for early release of retirement benefits where a member is permanently incapable of carrying out their current employment and have a reduced likelihood of being capable of undertaking any gainful employment before their normal retirement age (age 65). There are three levels of benefits. Enhanced periods of membership can be awarded where an IRMP opines that the member is not going to work again before age 65, or is unlikely to be capable of undertaking any gainful employment within three years of leaving their employment. The third level benefits are payable where the IRMP opines that the member is likely to be able to return to work within three years of leaving their employment. Third tier benefits are those accrued up to the point of leaving employment and are payable for a maximum of three years subject to a review after they have been in payment for 18 months. A subsequent determination of benefit entitlement is permitted under new regulation 20(11)(aa) and such a determination must now be made before the expiry of three years after the discontinuation of tier 3 benefits. The policy reason for this is to avoid applications for an uplifted determination many years after the initial determination which was not the original intention.

7.16 It was not the intention that a member should, at any time, receive retirement benefits greater than those that could be awarded for a tier 1 benefit. As such, should an ill-health retired member return to local government employment and subsequently be awarded further ill health retirement benefits, the total amount of the subsequent

benefits will be limited to the amount that would have been awarded had tier 1 benefits been determined initially.

7.17 Regulation 19(j) substitutes a new paragraph (13) in regulation 20. The effect of this amendment clarifies that a person who meets the criteria set out in paragraph (13), would be a continuous member of the scheme from prior to 31 March 2008 and who was 45 at that date, and is entitled to ill-health retirement benefits calculated on the basis of the period specified in regulation 28 of the 1997 Regulations, if this would result in a higher overall level of benefits than under the 2008 Scheme.

Regulations 20 and 21: Death grants: active members; Survivor benefits : active members; - Benefits Regulations 23 and 24

7.18 Provision has been included so that the calculation of death grant or survivor benefits takes no account of the reduction of pay where a member was in part-time employment as a result of a condition that subsequently leads to the death of the member. This is to ensure consistency of treatment for an active member who is in part-time employment as a result of a condition that results in the early release of retirement benefits on the grounds of ill health, and one who has reduced his hours as a result of an illness but dies in service.

Regulations 22, 28 and 30: Date that benefit commences – Benefits Regulations 27, 33 and 36

7.19 Current good practice is that payment of these benefits should begin on the day following death and this is made a clear entitlement by virtue of these amendments.

Regulation 23: Calculation on leaving early – Benefits Regulations 29

7.20 This amendment removes the misleading phrase “or any part of it”, as there has never been any provision for early leavers to choose to take only part of their deferred benefits at age 65.

Regulation 24: Choice of early payment of pension – Benefits Regulations 30

7.21 The policy aim of paragraphs (7) and (8) of regulation 30 is to make it clear that continuity of employment was required for members with sufficiently long service to be eligible to apply for retirement at the age of 50. This amendment is backdated to 1 April 2008 which was the date that paragraph (6) was originally substituted (S.I. 2008/1083).

Regulation 25: Choice of payment of pension : pensioner member with deferred benefits – new Benefits Regulation 30A

7.22 This new provision is made so that a member who has had tier 3 ill health retirement benefits which have ceased,-

(a) is entitled to his retirement pension at age 65; and

(b) can access his or her deferred benefits before normal retirement age, with permission if this is before age 55, with an actuarial reduction in accordance with

Government Actuary guidance. The policy aim is to ensure that members with suspended ill-health benefits are afforded the same capacity for release of those benefits before age 65 as deferred members of the Scheme.

7.23 This provision is effective from 1 October 2008 which was the end of a period of transitional protection, and provides continuity of rights to members who have left in receipt of the third tier of ill-health benefits from that date.

7.24 As a result of introducing regulation 30A, consequential amendments have been made as follows: Regulation 27 amends Benefits Regulation 32 to ensure that a pensioner member with deferred benefits is eligible for a death grant.

Regulation 26: Early payment of pension - ill-health – Benefits Regulations 31

7.25 Regulations 31 and 20(5) of the Benefits Regulations both require an employer to obtain a certificate from an IRMP. The amendment changes the terms in Regulation 31 to the same terms as those used in Regulation 20 (5).

Regulation 27: Death grants: deferred members - Benefits Regulations 32

7.26 This is a consequential amendment and the explanation for this is set out in paragraph 7.24. It is backdated to 1 October 2008 as it is consequential on the introduction of new regulation 30A.

Regulation 29: Death grant: pensioner members – Benefits Regulations 35

7.27 The purpose of this amendment is to ensure that any abatement of a member's pension which is applied by an authority does not have any effect on the amount of death grant which is ultimately payable.

Regulation 31: Pension increases under the Pensions Increase Acts – Benefits Regulations 38

7.28 The effect of the amendment is to make it explicit that LGPS administering authorities have the power to enforce the payment by employers of contributions arising through Pensions Increase liabilities in respect of periods before and after 1 April 2008. This includes those employers which no longer employ any active members of the Scheme. The amendment accordingly restores the position that pertained under the 1997 Regulations in respect of further accruals and is backdated to 1 April 2008.

Regulation 34: Membership accrued before 1 April 2008 – Transitional Regulations 3

7.29 This amendment corrects the Transitional Regulations, so that early payment of pension due to ill health is added to the list of benefits accrued under the 1997 Regulations which should come into payment at the same time as benefits accrued under the current Regulations. It is accordingly backdated to 1 April 2008.

Regulation 35: The 85 year rule – Transitional Regulations 10

7.30 This amendment makes it clear that it is the employing authority, rather than the administering authority, which has a role in considering early retirement requests from members. As a corrective amendment it is backdated to 1 April 2008.

Regulation 36: Civil servants transferred to the Environment Agency – Transitional Regulations 14

7.31 Various protections, for example regarding retirement age, have been granted to Environment Agency employees since their original transfer into the LGPS in 1996. Those protections were carried forward under the Local Government Pension Scheme (Transitional Provisions) Regulations 1997 (S.I. 1997/1613) but were inadvertently revoked when the 2008 Scheme came into operation. These are now duly restored and suitably backdated to 1 April 2008.

Regulation 37: List of regulations revoked.- Transitional Regulations Schedule 1

7.32 This is a very minor corrective amendment.

Regulation 39: Admission agreements – further provisions – Administration Regulations 7

7.33 This amendment removes the Secretary of State's role in the determination of any question which might arise between the parties relating to the construction of the admission agreement or the rights and obligations under that agreement. The terms of admission agreements remain a matter for discussion and agreement between the parties and so the reference to the Secretary of State is not needed.

Regulation 40: Eligibility for membership of other bodies not listed in Schedule 2 – Administration Regulations 8

7.34 This amendment adds a federated school to the list of other bodies not listed in Schedule 2. This will enable non-teaching staff employed by the governing body of a federated school to be covered by the Scheme.

Regulation 41: Supplementary provisions for certain members – Administration Regulations 10

7.35 This is an updating amendment to reflect a machinery of government reform which affected rent officers' terms of appointment and is backdated to 1 April 2009 which is the date the machinery of Government change took effect.

Regulation 42: Joining the Scheme – Administration Regulations 13

7.36 This is a tidying-up amendment to allow those members whose auto-enrolment into the LGPS takes place subsequently to their first taking up employment with an LGPS employer, to count their earlier period of employment as part of their Scheme membership, provided they apply to their employer to pay their arrears of contributions within three months of becoming eligible to join the Scheme, or such longer period as the employer may allow.

Regulation 43: Re-employed and rejoining deferred members – Administration Regulations 16

7.37 The policy aim of this amendment is to increase the choices open to members who leave the Scheme and later re-join following their re-employment in local government. They are now permitted to aggregate any of their previous periods of membership, not just the immediately preceding one, provided that they elect to do so in the first 12 months of their new period of membership. Additionally, until 1 October 2011 there is the opportunity for all active members to aggregate in this way, not only those who re-join after the amendment comes into force.

Regulation 44: Concurrent employments – Administration Regulations 17

7.38 This amendment also gives certain employees more freedom to aggregate membership, in this case those who have in the past held Scheme membership in respect of more than one employment at the same time. Such members are now able to aggregate membership if they have an entitlement to benefits under Regulation 5 of the Benefits Regulations, without necessarily having at least three months' membership in respect of that employment.

Regulation 45: Use of accumulated value of AVCs and SCAVCs – Administration Regulations 26

7.39 This amendment widens the possibilities for members making transfers into their additional voluntary contribution arrangements.

Regulation 46: Future costs – Administration Regulations 36A

7.40 The purpose of this amendment is to confirm the role of the Secretary of State in setting the assumptions to be used in the valuation report that will in due course inform how the future costs of the Scheme will be met. The assumption setting process will be done in consultation with the Government Actuary and others, including business partners who are members of CLG's LGPS policy review group.

Regulation 47 : Exclusion of rights to return of contributions – Administration Regulations 47

7.41 This additional exclusion is being made because it would not seem to be appropriate for a member who had been in more than one employment to be entitled to a refund if he was continuing in one of those employments.

Regulation 48: Commencement of pensions – Administration Regulations 50

7.42 This amendment is consequential on the introduction of new regulation 30A (choice of payment of pension: pensioner member with deferred benefits) of the Benefits Regulations and provides for the retirement pension to come into payment on the day the member exercises his or her choice to receive his or her pension, having reached the age of 55. For consistency and continuity reasons it is effective from 1 October 2008 in line with regulation 30A.

Regulation 49: Guaranteed minimum pensions – Administration Regulations 50A

7.43 This amendment is being made in order to correct an error made in the Local Government Pension Scheme (Miscellaneous) Regulations 2009 (S.I. 2009/3150), and is backdated to 31 December 2009 which is the date regulation 50A was introduced. The amendment also ensures that the Regulation works in tandem with Benefits Regulation 17.

Regulation 50: Interest on late payment of certain benefits - Administration Regulations 51

7.44 This amendment is made in order to protect benefits accrued under Earlier Regulations (as defined in Schedule 1 to the Administration Regulations). It is backdated to 1 April 2008 to ensure that interest is made payable for all periods.

Regulation 51: Payments for persons incapable of managing their affairs- new Administration Regulations 52A

7.45 As requested during the consultation period, a new provision is introduced for LGPS pensioners and other beneficiaries of the Scheme who are no longer capable of managing their own affairs. Administering authorities are permitted to re-direct payment of benefits to appropriate persons who would then have the means to make suitable expenditure on the beneficiary's behalf. Authorities may also make such expenditure themselves where necessary.

Regulation 52: First instance determinations: ill health – Administration Regulations 56

7.46 The policy aim of this amendment is to permit the same IRMP who assessed the member which resulted in the award of tier 3 ill health retirement benefits, to assess the member at the review undertaken under Benefits Regulations 20 (early leavers: ill-health).

7.47 The amendment further requires the IRMP to have regard to guidance given by the Secretary of State when carrying out their functions under Benefits Regulation 20 and regulation 31 (early payment of pension: ill-health).

Regulation 53 : Applications to resolve disagreements – Administration Regulations 58

7.48 This is a minor corrective amendment, to ensure that the reference made is to the correct paragraph dealing with the appeals process.

Regulation 54: Changes of fund and variable-time employees - Administration Regulations 87

7.49 The current provisions cover the position of a variable-time member transferring to another variable-time employment. The policy aim of this substituted regulation is to provide for a formula to deal with transfer to full or part-time employment.

Regulation 55: - Academies and the Greater London Authority - Administration Regulations Schedule 2

7.50 The aims of these amendments are as follows:

(a) The main provisions of the Academies Act 2010 (c. 32) came into force on 28 July 2010. The amendment to paragraph 21 of Part 1 of Schedule 2 provides that a proprietor of an Academy who has entered into Academy arrangements under the Academies Act 2010, is a Scheme employer. The amendment updates the statutory references as a result of that Act. Under pre-amended paragraph 21, an Academy within the meaning of section 482 of the Education Act 1996 or by virtue of section 67 of the Education Act 2002 (conversion of city academies into Academies), is by virtue of the transitional provisions in section 15 of the Academies Act 2010, deemed to be a reference to a proprietor of an Academy who has entered into Academy arrangements under section 1 of that Act.

(b) to add the Greater London Authority (“GLA”) to Part 1 of Schedule 2. The GLA is currently covered by a generic provision under paragraph 2 of Part 2 of Schedule 2 making it a resolution body Scheme employer. The amendment will move the GLA into Part 1 of Schedule 2. This means that new employees will automatically be eligible to join the LGPS without the need for the GLA to pass a resolution designating them as eligible to join the Scheme. The effect of the amendment will be to place the GLA on the same footing as local authorities.

Regulation 56: Appropriate Funds - Administration Regulations Schedule 4

7.51 These are minor amendments to aid consistency. The word “active” is being removed because the members concerned will eventually become deferred or pensioner members whilst continuing to belong to the same Funds.

Consolidation

7.52 Since the introduction of the 2008 Scheme, 9 amending instruments (including this one) have been made in respect of the LGPS constituting Regulations. The question of the consolidation of the Benefits Regulations and the Administration Regulations into one omnibus set of regulations (incorporating all the incremental amendments) can now realistically only be considered once Lord Hutton has reported on his review of public sector pensions, and CLG Ministers have decided in the light of that report what reforms, if any, should be made to the Scheme.

7.53 The Local Government Pensions Committee publishes on its website informal consolidated amendments to the LGPS Regulations (Timeline Regulations (England and Wales)): <http://timeline.lge.gov.uk/regidx.html>

8. Consultation outcome

8.1 The summary of responses and details of the responses to the consultation are available on the website www.clg.heywood.co.uk.

8.2 Before making these Regulations and in accordance with section 7(5) of the Superannuation Act 1972, the Secretary of State consulted business partners in writing, as listed at Annex A.

8.3 The consultation took place from 24 December 2009 to 18 March 2010.

8.4 27 responses were received. The areas of the original draft consultation Regulations which attracted most comment were the ill health related provisions, in respect of which there were 20 responses overall, detailed as follows:

8.5 11 respondents strongly agreed to substitute the word “obtaining” for the words “being capable of undertaking” in Regulation 20 of the Benefit Regulations. IRMPs are of the view that the former wording asked the IRMP to give an opinion beyond their professional competence. They were of the view that a person’s ability to “obtain” gainful employment would depend on other factors such as the person’s mental and physical abilities in the absence of the illness and the availability of jobs which may be influenced by economic conditions. The amendment clarifies the intention that it is purely the medical condition of the member that is to be considered under the ill health retirement regulations and not other factors.

8.6 There was support from 7 respondents for the proposal which would restrict the amount paid where a Scheme member retires with a further ill health enhancement, so that “first” and “subsequent” ill health pensions (when aggregated) do not exceed the level of pension the member would have received had their first award been a tier 1 ill health retirement. It is not the intention that the member receives more benefits than he would have received had he remained in his original employment until age 65.

8.7 There was strong support from 13 respondents for the new provision which allows “pensioner members with deferred benefits” ie a member with third tier benefits which have ceased, to access their deferred benefits from age 55 and before normal retirement age with an actuarial reduction. This proposal has been regularly discussed with practitioners who were keen to see that these members were not prevented from accessing retirement benefits before age 65 despite having taken tier 3 retirement benefits.

8.8 As far as the provisions unrelated to ill health were concerned, aggregation of membership attracted the most comment, with 10 respondents supporting the proposal to allow re-joining members to aggregate all of their preceding periods of membership, not just the immediately preceding one, whilst two opposed it and two were ambivalent. Six supported a 12 month “window of opportunity” during which all current active members should be permitted to aggregate any past period of membership, whilst one opposed such a window. The proposal to amend Administration Regulations 16 is accordingly being implemented, including the additional proposal for a “window of opportunity”, which will last until 1 October 2011.

9. Guidance

9.1 There is no guidance associated with this instrument.

10. Impact

10.1 A full Impact Assessment has not been prepared for this instrument as no impact on business, charities or voluntary bodies is foreseen.

10.2 The impact on the public sector is limited to LGPS employing and administering authorities. The ill health provisions contained in the regulations are broadly cost neutral or could lead to some efficiency savings through LGPS practitioners and occupational health doctors being able to apply the regulations more easily. The other proposals are also intended to be, at worst, cost-neutral and in many cases are being implemented at the request of public sector business partners.

11. Regulating small business

11.1 The legislation does not apply to small business as the Regulations deal specifically with the administration of a public service pension scheme.

12. Monitoring & review

12.1 As part of the statutory responsibility to regulate the LGPS, CLG monitors data returns from pension funds and, via its policy review group and ill health monitoring group, maintains an ongoing dialogue with the Scheme's interested parties. It was through this level of contact that operational problems were identified with the original wording of the Regulations now being amended. This process will continue but it is not envisaged that these amending Regulations will require a specific review after implementation. However, they could be included as part of any review and revision to the Scheme should this prove necessary, particularly in the light of any changes in CLG or Government policy.

13. Contact

13.1 Nicola Rochester at the Department for Communities and Local Government (CLG) Tel: 0303 44 42179 or email: nicola.rochester@communities.gsi.gov.uk can answer any queries regarding the instrument in respect of the following regulations: 19, 20, 21, 25, 26, 27, 48, and 52. Philip Perry at CLG Tel: 0303 44 42174 or email: philip.perry@communities.gsi.gov.uk can answer any other queries regarding the instrument.

Annex A

List of business partners

The Chief Executive of:

County Councils (England)
District Councils (England)
Metropolitan Borough Councils (England)
Unitary Councils (England)
County and County Borough Councils in Wales
London Borough Councils
South Yorkshire Pension Authority
Tameside Metropolitan Borough Council
Wirral Metropolitan Borough Council
Bradford Metropolitan City Council
South Tyneside Metropolitan Borough Council
Wolverhampton Metropolitan Borough Council
London Pension Fund Authority
Environment Agency

Town Clerk, City of London Corporation

Clerk, South Yorkshire PTA

Clerk, West Midlands PTA

Fire and Rescue Authorities in England and Wales

Police Authorities in England and Wales

Audit Commission

National Probation Service for England and Wales

Local Government Association (LGA)

Employers' Organisation

LGPC

ALACE

PPMA

SOLACE

ALAMA

CIPFA

Association of Colleges

Association of Consulting Actuaries

Association of District Treasurers

Society of County Treasurers

Society of Welsh Treasurers

Society of Metropolitan Treasurers

Society of London Treasurers

Association of Educational Psychologists

NALC

Society of Local Council Clerks

Trades Union Congress

UCATT

UNISON

GMB

NAEAC

NAPO

AMICUS

TGWU

Equal Opportunities Commission