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By email

4<sup>th</sup> January 2021

Dear Sir/Madam,

**Reference: 'Local Government Pension Scheme (NI) – Addressing Discrimination Amendments to the statutory underpin'**

I am writing on behalf of the Probation Board for Northern Ireland to respond to the consultation on '*Local Government Pension Scheme (NI) – Addressing Discrimination Amendments to the statutory underpin*'

We welcome this opportunity to provide some feedback.

Probation Board for Northern Ireland has supplied a short narrative response, as allowed for in the NILGOSC brief. Thank you for the opportunity to respond. The document is understandably quite technical so PBNI has concentrated on feedback relating to impact on its Employees and to PBNI as the Employer.

Overall, the main concern is that the equalization amendments in March 2022 do not conversely discriminate against those who were covered up until March 2022. PBNI believes that this assurance is provided under section 7.7 however this could be made clearer to readers/those affected.

The issue of Employer and Employee contribution rates is obviously of concern as there seems to be a certain inevitability that these will be increased as a result of these amendments. It is difficult to see how this pressure would be addressed otherwise. This needs to be outlined, or if this is not the case, assurances provided how these changes will be managed. Guidance with regard to new members to the scheme will need to be provided to Employers to manage expectations.

It would be important to have clear, comprehensive communications to Employers and Employees on how the revised scheme is going to operate, how Employers are to re-calculate as necessary and clear, non-technical reasons why the changes are necessary. In PBNI's view, communications should be as short, clear and concise as possible given the complexities. Those who are not working in the area of Pensions can often find communications quite technical and difficult to understand.

I trust these comments are helpful and if you would like to discuss our response further, please do not hesitate to contact me.

Yours faithfully,

*Gillian Robinson*

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Gillian Robinson

Head of Human Resources