

**SUMMARY OF RESPONSES TO DCLG'S CONSULTATION ON THE
DRAFT LOCAL GOVERNMENT PENSION SCHEME (BENEFITS,
MEMBERSHIP AND CONTRIBUTIONS)(AMENDMENT) REGS 2011**

No.	Date	Regulation	Comments
1	05 January 2011		They support the proposed amendment
2	21 January 2011	Benefits Regs : 20(3), 20(8), 20(11)	They oppose the amendment to Benefits Regulations 20(11) (aa) making it refer to paragraph (8) as a whole rather than paragraph (8) (b). Detailed analysis of certain aspects of the ill-health provisions
3	25 January 2011		No comments
4	26 January 2011	Benefits Regs : 20(3), 20(4), 20(5), 20(7), 20(11) Admin Regs : 56	They welcome the changes. Detailed comments falling into two categories: 1. Decisions required to be made by the IRMP. 2. A comparison of the 18 month review and the uplift from tier three to tier two
5	27 January 2011	Benefits Regs : 20(3), 20(4), 20(7), 20(11) Admin Regs : 56	Detailed comments in favour of amending regulations to permit an Independent Registered Medical Practitioner who made the original decision under regulation 20(4) to also make the decision under 20(11)(a) in respect of 20(3)
6	27 January 2011		They support the amendments as they are needed to clarify the situation on individual cases
7	28 January 2011		They take the view that the corrections proposed are sensible ones
8	28 January 2011	Benefits Regs : 23 (4A)	Regulation 4 of the consultation draft proposes to substitute the word "Membership" for the word "Pay" in regulation 23 of the Benefits Regulations. This amendment is not required. The word "Pay" should be retained in that regulation as the death grant is calculated by reference to the member's pay, not membership. This point was accepted. Detailed comments on other, unrelated, Regulations
9	28 January 2011		It is acknowledged that the changes are an attempt to remove any ambiguity from the previous legislation and that they will have no material impact

10	28 January 2011		They express concerns about the potential for additional administration if this is extended to staff in gainful employment. Clear and detailed guidance is needed to support review process
11	07 February 2011	Benefits Regs : 20(14)	They stress the importance of registration with the General Medical Council. They also suggest the possibility of harmonising the term 'Independent Registered Medical Practitioner' (IRMP) across pension schemes administered by the Home Office. The former point has been accepted but the latter is beyond DCLG's remit but is noted.

List of respondents

Association of Local Authority Medical Advisers, Bristol City Council, Cheshire Pension Fund, Greater Manchester Pension Fund, Local Government Employers, Merseyside Pension Fund, Oldham MBC, Oxfordshire County Council, South Tyneside Council, Thurrock Council, Wiltshire Pension Fund.