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By email to nmpaconsultation@hmtreasury.gov.uk

To whom it may concern

Implementation of the change in Normal Minimum Pension Age

I am writing on behalf of the Association of Consulting Actuaries with comments on HMRC's consultation on implementing the increase in the normal minimum pension age (NMPA).

The ACA welcomes the opportunity to provide input and set out our concerns. Summarising our comments:

The proposals for the current change in NMPA will maintain pension age protections that arose from the previous increase in NMPA in 2010 – which we welcome.

We also welcome that the proposed changes will not apply to members of the armed forces, police and fire service (although we note it is not clear how this applies for future joiners).

Other than those two special cases, the proposal includes a new protection regime for members who have certain unfettered rights in schemes currently. This seems appropriate so that existing rights do not lead to unauthorised benefits. Having said that, there is no doubt that more grandfathering creates and extends complexities - past experience shows protected pension age regimes are particularly complex; with some occurrence of the protections arising from unwitting wording. Our letter demonstrates some issues.

The rest of this letter concerns the details of the process of implementing the change. For the protection regime, we would particularly request:

- changes to the present **"block transfer"** provisions - to ease the many bulk rearrangements being carried out to improve the delivery of benefits to members;
- extension of the sensible simplifications being proposed for the new protections - so that they apply also to the **old protections**;
- provision by HMRC of **formal decisions and guidance as soon as possible** (guidance on some areas is needed urgently), to reduce the uncertainties that are affecting transfers now (individual and bulk), impacting member decisions, and actions by trustees and providers.

Unlike the 2010 change, the potential to qualify for the new protection regime will cover all types of registered pension schemes, so in particular the thousands of contract-based **personal pensions**

(PP)[1]. Many of our comments below focus on general principles or on the position for occupational pension schemes (OPS) – which are complicated enough; and we think it appropriate to align the protections for (particularly DC) OPSs and PPs unless there are specific good reasons - differences could add yet more confusion. However we do recognise that the proposed regime creates substantial issues for PP providers, for example in terms of which providers have policyholders that qualify for the new protection (and how to establish this), what normal commercial actions by the provider might compromise this, and how having protection in a policy might influence policyholder decisions. This all poses significant immediate problems for IFAs advising members.

We note that, in analysing the NMPA change/protection proposals, and the impact of the various complexities, it has been helpful to focus on how the proposals create three main categories by age:

- Individuals now aged at least 50 (date of birth 5 April 1971 or earlier): who are unaffected by the change as they will be over age 57 when the NMPA change takes place;
- Those now aged 47 or below (date of birth 6 April 1973 or later): who, for benefits in any particular scheme, will either have the new protection or see their NMPA rise from 55 to 57; and
- Those now aged 48 or 49 (date of birth 6 April 1971 – 5 April 1973) who, in any particular scheme, will either have the new protection or will have a brief "window" that opens and then closes for a period – a small but complex group.

But we have to bear in mind that any of these could have benefits in a scheme (an OPS or, very rarely a PP) with lower protected pension age arising from the earlier regime of protections.

The increase in NMPA is only 2 years - so much smaller than the 5 year change in 2010. But lessons from the 2010 change show the importance of establishing the detail, and how the potential pitfalls can impact on the operation of schemes, certain scheme projects, and member decisions.

Finally, we would note that the increase in NMPA per se, from 55 to 57 in 2028, is a confirmed policy decision[2], so we do not comment on this - bar noting here that it does seem counter to the increased flexibility that the ACA think is needed to encourage savings.

We hope you find our comments useful. We would be happy to discuss this matter further if you wish – if so, please contact me on 020 7432 6621 (or at karen.goldschmidt@lcp.uk.com) , or Jillian Pegrum on 01252 768175 (email jillian.pegrum@aon.com)

Yours sincerely

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Chair of the ACA Pensions Tax committee
On behalf of the Association of Consulting Actuaries Limited

[1] Some members did acquire old protection by virtue of PP membership in 2003/6 - but a very limited group with special characteristics.

[2] along with the consultation statement that *"The government's position remains that it is, in principle, appropriate for the NMPA to remain around 10 years under state pension age SPA, although the government does not intend to link NMPA rises automatically to state pension age increases at this time."*.

Appendix 1

In the following we have included in bold italics some actions that we hope you will consider.

1-Are there any specific considerations that should be taken into account regarding the government's proposed framework for the increase to the NMPA?

The forthcoming legislation (or Finance Act plus regulations finalised well in advance of 2028), for which we hope to see drafts as soon as possible, will be addressing two aspects:

- Provisions for a protected NMPA re the new measure (we call this **2028 PPA,** by contrast to the existing protections from the 2010 change in NMPA which we call **2010 PPA**)
- The imposition of the new NMPA for those who do not have a PPA; and in particular the transitional measures for those who have reached 55 but not age 57 by 5 April 2028 (which we call below "window members")

As noted earlier, lessons from the 2010 show the importance of establishing and putting in place early the detail of both the protection and the transitional provisions (by way of the detailed legislation and guidance on interpretation), and understanding potential pitfalls.

We set out below detailed commentary on the two aspects.

Aspect 1: provisions for 2028 PPA (see also subsequent questions)

A huge challenge for trustees and providers is to establish whether their particular rules do give some of their members 2028 PPA (which may have a lottery element) - discussed further in Question 2. The second challenge is the fact that, under the proposals mirroring the 2010 PPA provisions, the protection can be lost by a range of transfer activities – such activities are happening now. Transfers include[3]

- individual transfers between personal pensions, perhaps to acquire better terms/ expenses/ investment options/ flexibilities;
- individual transfers of members who are in a DB OPS to DC, perhaps to access flexibilities;
- individual transfers of members who are in a DC OPS to another vehicle that may offer more Freedom and Choice flexibilities;
- bulk transfers from OPSs involving some or all their DC liabilities to access specialist DC; management e.g. to Mastertrusts to improve out member outcomes
- bulk transfers in future from DB OPSs to consolidators;
- wind-up of OPSs, involving bulk transfers and/or transfers to buy-outs.

Compared to the situation when the 2010 changes took effect, the number of transfers between schemes has vastly grown. This amplifies a whole set of concerns that emerged for 2010 PPA.

The consultation proposes (as for 2010) that 2028 PPA will be lost on transfer unless part of a **"block transfer".** Any current transactions are having to be managed on the assumption that these provisions apply unchanged. We set out below particular issues arising from this condition, for which solutions are needed not just for 2028 PPA but for 2010 PPA too (more on this later):

- **"1 year requirement":** The block transfer provisions do not apply if the member has joined the receiving scheme more than 1 year before the transfer (this 1 year provision was an easing of the original "no prior membership" drafting in Finance Act 2004.

  This provision is a real pitfall for the many current exercises where employers/trustees are arranging to close DC provision through an OPS and move it into a specialist arrangement such as a Mastertrust with the aim to improve member DC outcomes. The set-up for new contributions can be established quickly, but there are various practical reasons why it can take some time to

[3] A subtle issue is that a provider may set up its apparently separate policies (PPs or a Mastertrust or a consolidator) such that, what would appear to a member to be different arrangements in fact are a single one for pensions tax purposes. This adds unexpected results and pitfalls, when it comes to looking at how protections arise or are lost by transfers.

transfer past funds. (If the 1 year deadline is missed the members lose protection that - but for the scheme rearrangement - could have applied for the past fund and future contributions).

***ACTION: We would ask for this to be modified, to ease these common transactions*.**

- **"Block transfer" does not cover partial transfer**
  A bulk transaction by trustees of an OPS does not qualify for block transfer status if it only relates to part of the benefit. When an OPS retains DB liability but is transferring out its DC arrangements to a specialist arrangement such as a Mastertrust, this is proving a real issue in respect of those members with PPA who have both DB and DC benefits. This may mean that these members have to be missed out of the bulk exercise and left (both DB and DC) in the original scheme. This issue may also arise in future transfers to consolidators where the DC elements might be separated off to other vehicles.

  Ideally bulk transfer tidy-ups are arranged under an automatic process needing no specific consent from the members involved (who may not engage or indeed who may not even be contactable), provided the trustees satisfy themselves of the appropriateness of the transfer. The risk of losing protections undermines such a process.

  ACTION: We would ask for block transfers to accommodate partial rights within bulk transfers in these circumstances.

- **"Block transfer" does not cover individual transfers (unless the member "buddies up")**
  Under the current framing of block transfers, a member who wants to take a transfer from a scheme in which they have PPA to another scheme for better terms has to accept that they lose the PPA and so may have to delay the future drawing of their benefits.

  Unless block transfers can be used, the change in NMPA will have implications for consolidation of schemes. DWP's small pots working group is looking at compulsory transfers (e.g. pot follows member) – the risk is that some members may lose a PPA under such a scenario - albeit that "pot follows member" should benefit most members otherwise.

Similarly a TUPE transfer could result in a pension transfer that does not meet the criteria of a block transfer and would lead to someone having to leave a scheme where they currently have a 2028 PPA

We note that the legislation (currently in FA04 Schedule 36) includes references to regulations. Care is needed when extending the legislation to create the new protections, to include those regulations appropriately and generally to avoid unintended consequences. The fact that 2010 protections will be maintained will create further challenges in framing the legislation.
For example, it is important that, the legislation continues to apply such that, for wind-ups of OPSs, protections continue to survive when trustees transfer members to buy-out policies.

(***ACTION: We note as an aside that this could be an opportunity to clarify a reference in regulations*** also connected with Schedule 36, to a situation relating to Fixed Protections and buy-outs, on which we have written separately.)

Aspect 2 transitional provisions for "window" members

The imposition of the new NMPA creates particular transition issues for those who at 6 April 2028 will have reached age 55 but are yet to reach age 57 (so aged 48 or 49 now, with a date of birth between 6 April 1971 – 5 April 1973) and who do not have a PPA.

Care is needed on the legislation written to implement the transition in 2021 relating to benefits drawn around that time.

Reminder: For the 2010 change, the legislation for the change was very simply written, but its application turned out to be unintuitive. In the run-up to 2010, there was a general reading that the legislation provided a member with an ongoing NMPA of 50 for benefits if the actual "entitlement" to those benefits arose by 6 April 2010 – and this was reflected in HMRC newsletter 38. (HMRC issued *guidance and Q&As to explain how one might read "entitlement" safely etc – including warning the public to approach their schemes early if this could be an issue for them, to avoid a queue and potential bottleneck of admin work.)*

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In December 2010 HMRC revised its reading – the principle did not turn on "entitlement", instead it turned on "payment". However, HMRC gave an easement to schemes/members who had relied on its previous guidance and would fall foul of the new reading[4]). This easement was bedded into law by retrospective regulations (SI2011/722).

All this means that the practical implications of "correct" reading of the original legislation has not been fully tested but is known to have flaws; and that if the 2011 regulations are the intended template of managing the transition, they will need some changes; and there is a risk that neither will have been fully tested in the light of pension options that became available after 2010 including the Freedom and Choice flexibilities.
We set out in Appendix 2 some early thoughts on the problems that could arise if the 2010 (untested) legislation is re-used.

QROPS transfers

We also note here that we have seen the submission by Debra Smith to HMRC 9 March 2021 on implications for certain QROPS, regarding the order of payment and its implications, and we endorse the concerns.

Other comments not relevant to Finance Act drafting, but considerations for schemes

Many DC pension schemes use "lifestyle" strategies as their default investment arrangement, whereby member investments are moved out of growth assets into a lower risk portfolio on an automated basis on the approach to retirement. Such strategies rely on the "right" target retirement date being recorded on administration systems for each individual.

This brings the following potential risks:

- That changes to retirement ages lead to automated jumps in asset allocation (either re-risking or quickly de-risking members at a single point in time) – this means a timing risk for any such changes (selling assets at a low price and/or buying other assets at a high price "in one go") and also results in members incurring additional and potentially unnecessary transaction costs close to retirement
- Members may not be aware / fully understand the impact of such a change.

Here, 2028 PPA would be welcome for those who are currently in lifestyle investment strategies based on an target retirement age of 55. However, many of these schemes may not actually meet the conditions for a PPA – so we would welcome early resolution of some of the uncertainties listed in this letter about protections, so that schemes can revisit lifestyling for relevant members in order to work with their administrators / providers on understanding how de-risking strategies will be affected and what should be communicated to members.

4 Without this easement, a pension that had entitlement settled by 1.4.2010 but first payment after 5.4.2010 (eg because pensions were paid in arrears) would have instalments counted as unauthorised for 5 years.

2-Are there any particular issues that the government should consider in the way NMPA is defined in pension scheme rules?

Scheme rules define rights to retire in a variety of ways (which may or may not refer to the NMPA as defined in Finance Act 2004).

We note the consultation formulation of the protection qualification:

> *"2.5 The government proposes to offer a protection regime for the increase to the NMPA in 2028 for all types of registered pension scheme. This would mean that an individual member of any registered pension scheme (occupational or non-occupational) who has a right under the scheme rules at the date of this consultation to take pension benefits at an age below 57 will be protected from the increase in 2028."and*
>
> *By "right", throughout this consultation document, we mean an unqualified right under which individuals do not need the consent of any other person (such as an employer or trustee) before they can take their benefits at a particular age."*

Two issues are apparent, which both create immediate concerns:

- Establishing whether a member has 2028 PPA (and under what contingencies)
- No time to change rules for new entrants

Issue 1 Difficulty in establishing which scheme members have 2028 PPA (and under what contingencies)

The proposed linkage between 2028 PPA and the member's position (and that of their scheme) at 11 February 2021 is understandable, although it would effectively mean that a member with the protection who might have planned to crystallise benefits from age 55 would – as noted above - need to remain a member of that same scheme (unless there is a block transfer).

The consultation extract above suggests the intention is for legislation similar to the 2010 provisions (with some differences noted below). Experience from the 2010 changes shows how difficult such rights can be to establish; and that whether they apply can be a real lottery possibly down to some unwitting variation in wording (examples below).

- The right will depend on the exact wording of the scheme rules;
- For the 2010 change, the wording of the law was such that, if a member has a right subject to a contingent event then that member would acquire the right to a 2028 PPA if that contingent event occurs. Examples in DB schemes might be an ongoing unfettered right to retire early if leaving service on redundancy. And (especially in DB schemes, that will have gone through changes such as closure to accrual, or bulk transfers in) the rights may vary between categories of members.

Examples of framing of rules that cause confusion/lottery include

- If the rules/provider's T&Cs refer to a "right to draw from NMPA as defined in the Finance Act"
- The same but "the right to draw from NMPA as per Finance Act, currently age 55 but expected to rise to 57 in 2028".
  This is a common addition made after September 2020 when Government reconfirmed (for the first time in some years) its intention to raise the NMPA. If the reading for this is different from the preceding bullet, that is a clear demonstration of the lottery issue.
- If the member first has to take an action involving any sort of request to the scheme/provider
- There may be much broader variation in DB schemes – but our impression is that DB schemes are delaying checking whether their scheme rules provide 2028 PPA until the law is clarified (especially if currently there is no bulk transaction and if no member below age 50 is requesting a transfer. It is DB schemes that will have the greatest variations of position by category.

ACTION: the intent of the legislation (ideally with draft wording) and guidance on some of the above points need to be issued as soon as possible.

Issue 2 New entrants

Schemes currently open to new entrants - rare for DB but common for DC – have another challenge, if there is any possibility that the 2021 rules give some unfettered rights to retire before 57:

We read the quoted consultation provision above to mean that, where there is a February 2021 provision that counts to give protection, only members who are actually in a scheme in February 2021 acquire PPA2028 by virtue of that scheme rule. New joiners cannot acquire PPA2028 (although they may bring in a PPA2028 by a block transfer from another scheme under which they had protection).

So a scheme with such a rule would want to change it so as not to apply for new entrants from February 2021 (to avoid promising a benefit option that can only be delivered as an unauthorised benefit). This overnight change of position is different from the 2010 changes, where there was a 2003 announcement and the 2004 Act that gave protection for members joining the protected scheme category all the way up to 5 April 2006. This gave time to work this issue out in the light of actual detailed legislation and HMRC guidance..

ACTION: An easement may be desirable, depending on how widely this situation is arising.

3-The government proposes that the protected pension age will apply to all the member's benefits under the scheme (if the conditions for a protected pension age are met), not just those benefits built up before 2028. Are there any other alternative options or issues the government should consider around the treatment of accrued and future pension savings?

Where a member qualifies for PPA 2028 in a scheme, it seems sensible that the PPA 2028 should apply to all the benefit for the member in the scheme – including benefits accrued up to 2028, benefits accrued from then onwards; and also any benefit transferred into the scheme (even if the transferring scheme did not have such a PPA for the member). This mimics the situation for PPA 2010 and recognises the impracticality of a scheme managing one member having different protection ages. (We do however appreciate the lifetime and extent of a grandfathering rule, and that it has knock-on impacts particularly for member decision-making on PPs.)

4-Are there any issues associated with schemes informing members who meet the conditions of their rights to a protected pension age?

Schemes are generally putting out messages to members of the NMPA change, particularly following the reconfirmation in 2020 that the change would go ahead.

If there are members who would have a 2028 PPA for benefits in the scheme then trustees would consider it appropriate to communicate this, along with information on the impact on members (and the conditions which they would need to meet). This would be part of the trustees' fiduciary duties.

Given the advice and guidance that members ought to be obtaining before making individual transfers, this would be a very relevant point for trustees to disclose particularly to those considering transfers, and it should be a relevant point for IFAs to ascertain.

Schemes with some members who already have a protected pension age from the 2010 change will have experience of this issue, the careful legal advice needed, and the communications involved; but it is likely that, for these schemes, the rules have been changed for joiners after 2003/2006 so need reappraisal for the new protections; and it may not be the same schemes seeking to rely on a 2028 PPA.

The uncertainties noted above mean that at the moment schemes might only give members asking about transfers a broad and uncertain warning about the possibility of a protection that might exist and be lost (the warning will not be needed for those who are currently aged 50 or over).

5-Are there any circumstances why the increase in NMPA may impact on pension flexibility (which was introduced following the 2014 consultation on "Freedom and Choice in Pensions")?

Yes. Our earlier comments highlight several areas.

For members with 2028 PPA (or indeed 2010 PPA) access to pensions flexibility might only be possible by taking an individual transfer (of all or part of the benefit in the scheme) to another scheme; the fact that block transfers do not (usually) include individual transfers means the protection would be lost. So such a member has to choose between access to flexibility and delayed access to benefits.

For the members of the "window" group, there may be issues depending on the legislation used around the transition date – see Appendix 2.

For members without protection, authorised lump sums whose payment timing is linked to NMPA (for example trivial and small commutation, and UFPLS) will become unavailable until 57.

6-Are there any implications the government should consider by not requiring that all scheme benefits must be crystallised on the same day as a condition for a protected pension age?

The 2010 change was made when the Freedom and Choice flexibilities did not exist.
Given the changes since then, it does seem appropriate to lift the requirement that a member crystallises all their benefits from a scheme at once in order to retain a 2028 PPA. Indeed, to leave the requirement in place would run counter to the government's stated intention that the rise in NMPA should protect individuals from using up their funds too quickly. We have not spotted any specific technical issue with this proposal.

We do however consider this issue (and connected ones) for older protections:

Interaction with 2010 PPAs

We would propose that this requirement is lifted for those wishing to retain 2010 PPA - this would be natural reasoning and would support flexibility and avoid two complex sets of rules.
(If this is not done, then the law needs to accommodate what happens if a member loses 2010 PPA by, say, drawing part of their benefit in the scheme. In order to have qualified for 2010 PPA in 2006, the member's rights at 2006 would have been to unfettered retirement below 55 – such a right would still have existed in February 2021; so at worst they should fall back to a PPA of 55.)

ACTION: ***This and any other easements that are given to the conditions applying for 2028 PPA as a result of the consultation (see Aspect 1 of Question 1) should also apply for 2010 PPA.***

Interaction with scheme-specific protected lump sum rights (PLSR) from 5 April 2006.

Many OPSs (particularly DC schemes) have members with Protected Lump Sum Rights (grandfathered rights from a member's position in the scheme at 5 April 2006 (or by block transfer from such a scheme).
The legislation for this protection has a lot of overlap with PPA, particularly the triggers for losing protection.

Some members of a scheme will have a combination of PLSR and 2010 PPA or 2028 PPA
It will be very confusing that staggered drawing will not lose a PPA but would lose the PLSR protection.
Having said that, we appreciate that very careful work would be needed to design a sensible formula for the retirement lump sum allowed by the PLSR if there is staggering.

ACTION: Changes to the legislation for the new PPA protection regime would also need to be framed having regard to the potential knock-ons for PLSR. It would also be helpful for scheme reorganisations, if easements on block transfers also apply to PLSR.

Appendix 2

The following relates to the "window members" who will have reached age 55 before 6 April 2028 but reach age 57 after then, and who do not have a PPA.

There will inevitably be a build-up of cases trying to beat the 5 April 2028 deadline, so as not to have a potential extra 2 years wait. This can be handled with sufficient warning, if the operation of the law is clear from the outset (and if, as last time, HMRC also puts out some messages about the cliff-edge). In the following is it worth noting that members involved could have birthdays very close to the change date.

If HMRC uses the same style of legislation and the same reading of it as in place for the 2010 change in NMPA[5], the following appear to be some outcomes for 2028:

1. If the pension benefit is a "scheme pension", then' in order for the NMPA to be retained as 55 (such that the ongoing pension payments paid after 5 April 2028 continue to be authorised while the member was below age 57) then the first pension instalment would need to be paid to the member before 6 April 2028.

   This would be an extra planning hurdle if a scheme pays pensions monthly in arrears, and possibly impractical for some dates.
   As an alternative, HMRC could re-set the primary legislation to centre around having "entitlement" to the pension ahead of 6 April 2028, as defined for benefit crystallisation (as was effectively the case for 2010 due to HMRC's change in interpretation from its initial announcement[6])

2. Similarly, if the pension benefit is a lifetime annuity, the first payment must be made before 6 April 2028.
   The same comments apply as for 1.

3. If a window member has funds designated into flexible drawdown, then they would have to make their first income withdrawal before 6 April 2028 if they want to make any withdrawals before reaching age 57.

4. If the member withdraws a notional amount to solve this issue, then this will trigger the application of the Money Purchase Annual Allowance - potentially 2 years earlier than the member might reasonably have planned.
   As an alternative, HMRC could re-set the legislation to centre around the timing of the date of benefit crystallisation, being date of designation of funds for drawdown (so that a member would not be compelled to draw funds in order to retain NMPA 55).

5. Authorised lump sums whose payment timing is linked to NMPA (for example trivial and small commutation, and UFPLS) would need either to be paid before 6 April 2028 or else wait until the member reaches age 57.

6. The position on PCLS would have to be considered carefully for the variety of issues that could arise, given that a PCLS must be paid before NMPA but – for good practical reasons – has a permitted window of payment up to 6 months before "entitlement", linked to "entitlement" date of the related pensions.

We have not carried out further analysis but it seems possible that as a result of these various provisions, a window member could end up with multiple NMPAs in one scheme.
(As an example, would a member age 55 drawing an UFPLS before 6 April 2028 from a DC arrangement set the NMPA at 55 for the whole DC arrangement and hence allow further UFPLS (or income withdrawal) immediately after 5 April 2028, or would the UFPLS be treated as a payment just from one part of the DC fund?)

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[5] see HMRC Newsletter 44 in December 2010, explaining what the legislation in place actually meant.

[6] retrospective regulations SI 2011/732 which applied retrospectively from 6 April 2010 for cases which otherwise would fail the primary legislation condition

The issues will need to be considered broken down into different characteristics:

- reach age 55 by 5 April 2028 but have not taken some or all of their benefits from a scheme
- reach age 55 by 5 April 2028 and have taken some or all of their benefits from a scheme, but then take action that might - without proper wording in legislation – be seen as making future payments unauthorised
- reach age 57 shortly after 5 April 2028 (and who may commence pension shortly after that date but wish to take the related PCLS before 6 April 2028 (when they would have been above the NMPA of 55 at the time)

Based on the legislation for the 2010 change (and 2011 amending regulations) a member's status as regards having commenced a benefit no earlier than the prevailing NMPA was retained following a transfer of pension or funds. We expect that these regulations will work in a similar way for the 2028 change.

Members of the ACA are all qualified actuaries – mainly Fellows of the Institute and Faculty of Actuaries. All actuarial advice given by our members is subject to the Actuaries' Code. Members provide advice to thousands of employers and pension schemes - with total assets exceeding £1 trillion - including most of the country's largest schemes – and increasingly consulting actuaries are now involved in a wide range of additional areas.