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The Department for Work and Pensions
Caxton House
Toothill Street
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Dear all

Automatic enrolment: alternative quality requirements for workplace schemes (DB, Hybrid and CDC)

I am writing on behalf of the Association of Consulting Actuaries in response to your consultation on the above quality requirements.

Given the tests are well established and understood, we support retaining the current requirements without changes.

Our comments on your questions are set out in the Appendix.

We hope that you find the contents of this letter of assistance. We would be happy to discuss them further if that is helpful.

Yours sincerely

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Chair, ACA Pensions Schemes Committee
On behalf of the Association of Consulting Actuaries Limited
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APPENDIX

Specific consultation questions

General questions

1. **Do the alternative quality requirements for defined benefit and hybrid schemes still deliver simplification and flexibility for sponsoring employers and pension schemes that are unable to use the TSS?**

Where possible, please provide information on the frequency of use and circumstances where schemes revert to using the TSS.

Given the tests are well established and understood, we support retaining the current requirements without changes.

2. **In practice, who is carrying out the tests and signs off certification: the employer (i.e. self-certification) or its professional advisers?**

Where possible, please provide information on cost/time to certify and what governance/assurance is used.

We have not attempted to explore these issues.

3. **Are there any issues or considerations that sponsoring employers or pension schemes would like to bring to DWP's attention regarding the operation of the alternative quality requirements?**

Please describe any issues that have arisen to date, as well as any issues you anticipate may arise in the future. Where possible, indicate the frequency and scale of these issues, and set out any suggested solutions or mitigations.

We have no issues to raise.

4. **Do the alternative quality requirements for CDC schemes remain appropriate for single and connected employers?**

For new unconnected multi-employer CDC schemes, are the proposed alternative quality requirements appropriate?

We note that you propose a wider range of options to be available for unconnected multi-employer CDC schemes than currently apply for single and connected employer CDC schemes. In particular, it is proposed that the alternative DC test will be available for unconnected multi-employer CDC schemes, in addition to the alternative CDC test that is available for single-employer CDC schemes.

We have no reason to object to this approach, although we are not sure why both of these options are not available to both types of CDC scheme – the more restrictive approach for single or connected employer schemes is not explained.