

# **LGPS Access and Fairness Consultation**

## **19 August 2025**

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# LGPS Access and Fairness Consultation



[Consultation](#) ran between 15 May 2025 and 7 August 2025



[LGA consultation response](#)



[LGPS SAB consultation response](#)

# The LGPS Access and Fairness consultation

## Core objectives

- Ensure equal access to LGPS pension benefits.
- Address historic discrimination and gender pension gaps.
- Improve scheme administration and data transparency.

## Key policy areas

1. Survivor pensions and Death Grants
2. Gender Pension Gap
3. Opt-Outs
4. Forfeiture Rules
5. Technical amendments

# Survivor Pensions and Death Grants

Equalisation of survivor benefits regardless of gender or relationship type.

Retrospective removal of the requirement for signed nomination forms for cohabiting partners.

Removal of the age 75 cut-off for death grant eligibility

# Gender Pension Gap & Opt-Outs

## Gender Pension Gap

- Make unpaid absences under 31 days automatically pensionable.
- Include unpaid maternity, adoption, and shared parental leave as pensionable, with costs covered by employers.
- Make gender pension gap reporting mandatory

## Opt-Outs

- Introduce mandatory data collection on opt-out rates.
- Require demographic and equalities data from those opting out.
- Include opt-out statistics in annual reports to improve transparency

# Forfeiture and Technical amendments

## Forfeiture Rules

- Remove the condition that a member must leave employment due to an offence for forfeiture to apply.
- Abolish the three-month time limit for employers to apply for forfeiture

## Technical amendments

- Various changes to improve the day-to-day running of the scheme.
- Includes updates to calculation methods and administrative processes

# Gender Pay Gap proposals

## The Gender Gap

- **74%** of the LGPS members are women
- Post 2014 CARE scheme the average pension is 34.7% lower for women
- Pre 2014 final salary scheme the average pension is 46% lower for women

## Proposals

1. Authorised absences under 31 days
  - Make short unpaid leave automatically pensionable
  - Using lost pay (not APP) for contributions
2. Unpaid leave over 31 days
  - Align buy-back costs with standard contributions.
  - Extend the buy-back window to one year.
3. Make unpaid parental leaves (13-week additional leave) automatically pensionable with the cost (estimated by GAD to be £1m) met by the employer
4. Make gender pension gap reporting mandatory

# Opt-Out Proposals

## Annual Reporting

- The government proposes that the percentage rate of opt-outs will be required to be published in the Annual Report of each administering authority

## Data Collection

- Updated opt-out form to be provided. The current opt-out form does not have to include a section for members to say why they are opting out, nor their personal circumstances
- Additional optional gov.form to collect demographic and equalities data direct from members. This will collect data on reasons for opting out, profession type, working hours and salary, gender, age, ethnicity, marital status and dependants, and would automatically return to MHCLG.



# Summary of LGA response

<b>Gender Pension Gap – Short Unpaid Leave</b>	✓ Agree	Suggests lowering 30-day threshold to 14 days for practicality.
<b>Gender Pension Gap – Use Lost Pay for Contributions</b>	✓ Agree	Lost pay is simpler and more accurate than APP; aligns with current practice.
<b>Gender Pension Gap – Buyback Cost Alignment</b>	✓ Agree (with caveats)	Supports in principle; raises concerns about system complexity and tracking.
<b>Buyback Time Limit Extension (30 days → 1 year)</b>	✓ Agree (with condition)	Should apply only if member is still with same employer.
<b>Gender Pension Gap Reporting – Mandatory</b>	✓ Agree	Supports triennial reporting; annual would be too burdensome.
<b>Gender Pension Gap Reporting – 100 Employee Threshold</b>	✗ Disagree	Recommends 250 LGPS members instead; 100 too low and risks privacy.
<b>Gender Pension Gap – Definition</b>	⚠ Concerned	Definition too vague; needs clearer methodology and assumptions.
<b>Opt-Out Reporting – Annual Report</b>	✓ Agree	Also suggests central reporting via SF3 for timeliness.
<b>Opt-Out Reporting – Data Collection</b>	✓ Agree (with caveats)	Needs clear employer obligations and guidance; supports anonymous form.

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**Thank you for listening!**

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