

APPENDIX 1

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Our Ref: PS/PM

Your Ref:

Direct Line: 0151 242 1390

Please ask for: Peter Mawdsley

Date: 3 October 2008

Dear Nicola,

**PROPOSED CHANGES TO REGULATION 16 OF THE LOCAL
GOVERNMENT PENSION SCHEME (LGPS) (ADMINISTRATION)
REGULATIONS 2008**

I refer to your letter dated 19 August 2008 and the draft regulations that were enclosed with it.

I confirm that the Authority in its role as Administering Authority of the Merseyside Pension Fund has confirmed that it supports the proposed wider approach suggested in paragraph 7 in respect of the proposed amendment to disapply Regulation 16(6) and instead to assume automatic aggregation (subject to a right to elect for separate benefits?) on change of local government employer in the case of any current or future reorganisations.

The Department may however wish to consider going further than proposed and reverting to the approach adopted in Regulation D12 (1) (c) and D12 (2) of the LGPS Regulations 1995 and reintroducing automatic aggregation in all cases of all re-employment in local government, subject to a right to elect within 3 months or other agreed period of re-employment to keep separate benefits.

In either of the above cases considerable savings in terms of simplification of the process could be achieved.

If you require any further information or assistance please let me know.

Yours sincerely

Deputy Head of Pension Fund