

The Teachers' Pension Scheme (Amendment) Regulations (Northern Ireland) 2025

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) is a trade union and professional association representing around 25,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business leaders and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million children and young people across primary, secondary, post-16 and specialist education. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to respond to these proposals, which seek to amend the Northern Ireland Teachers' Pension Scheme (NITPS) regulations in light of the 2020 scheme valuation.
3. When considering the impact of any proposals on different groups, it is ASCL's policy to consider not only the protected characteristics included in Section 75 of the Northern Ireland Act 1998, but also other groups which might be disproportionately affected, particularly those who are socio-economically disadvantaged. We have answered any equality impact questions on this basis.
4. We are happy for our response to be published in full.

B. Answers to specific questions

Question 1: What are your views on the policy options being proposed in the consultation document?

5. Acknowledging that any contribution increase impacts adversely on our members, ASCL accepts the actuarial need for the 9.6% total employee contribution yield.
6. ASCL recognises that contribution tiers, having been raised in line with the consumer price index (CPI), have resulted in real terms yield reduction.
7. It is ASCL's view that of the proposed options outlined in this consultation, 'Option 1 – Increase all but the lowest tier by the same multiple' should be adopted to address the shortfall in the employee contribution yield. However, we would prefer for the contribution rate to be calculated to one decimal place, as in the current structure, rather than two.
8. We believe that protection of the lowest paid members is of high importance in order to maintain scheme sustainability and remain a viable option for younger members joining the scheme.

Question 2: Do the draft amendments achieve the policy aims as described in the consultation document?

9. Yes, we believe that the proposed amendments as outlined, would address the need for a 9.6% yield to be achieved.

Question 3: Are any other amendments to the scheme regulations required to achieve the stated policy aims?

10. No, we do not believe that any other scheme regulations would be required in order to achieve the stated policy aims.

Question 4: Are there other comments or observations on the Section 75 equality duties and the proposed changes that you would wish to make?

[42.11](#). As it has been presented, we have not identified any specific issues. However, considering the complexity and technicalities of the regulations we reserve the right to highlight any concerns or unintended consequences should they become apparent.

C. Conclusion

~~13.~~12. As outlined above, ASCL is broadly supportive of the proposals in this consultation and of the options presented, favour Option 1.

~~14.~~13. I hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

Melanie Moffatt
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Association of School and College Leaders

13th February 2025