

**Q1) Are there any consequences of the proposed contribution tiers that you consider have not been addressed?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
<p>Comments:</p> <p>UCU opposes the Government's position that increased contributions are necessary whether such is tiered or otherwise.</p> <p>There has been no valuation of the NITPS scheme conducted by DFP and DENI to assess contribution levels. There is therefore no evidential basis to conclude that the scheme is unsustainable in the long term if the employee contribution is not increased. UCU reminds the Department that our members have already been subjected to increased pension contributions. In addition, they have endured a two year pay freeze, have not yet received a 1% pay award or had their contractual increments paid. All on foot of DFP advice.</p> <p>Tiered or not, increased pension contributions equate to an unfair and unreasonable taxation of public sector staff. According to data published by the Office for National Statistics the average public sector employee pays 4.9% of salary into a pension. Under these proposals, members of TPS will be paying between 6.4% rising to 11% through the tiers for those earning up to £45,000. UCU believe these pay bands should not be subjected to the proposed contribution increase, either now or in the future.</p> <p>UCU fears that this unnecessary hike in employee contribution combined with an increase in the normal retirement age, will adversely impact on opt-out levels from the scheme. Extending the age at which a lecturer can retire while simultaneously increasing contributions, may encourage members to seek alternative investment opportunities for retirement. Should the current pensions 'reforms' effect a significant exit from the scheme, such will jeopardise the long term financial viability of NITPS.</p> <p>The Government's refusal to properly cost review the scheme indicates this is a political attack upon public sector pensions and not a policy arising from financial necessity.</p>		

**Q2) Do you consider that there are equality issues that will result in any individual groups being disproportionately affected by the proposed contribution tiering? If so, what do you consider to be the disproportionate effect?**

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not sure
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Comments:

It is impossible to state with certainty whether the proposed tiering will have a disproportionate effect upon groups with protected characteristics in the absence of a full Equality Impact Assessment. UCU notes that the Department has previously failed to conduct an EIA in respect of increased pension contributions. UCU asserts that DENI's reliance on EIA conducted in England and Wales does not satisfy statutory requirements. Section 75 Of the N. Ireland Act 1998 compels the Department to have due regard to equality considerations specifically in **N. Ireland**. DENI is remiss in its statutory obligations if it does not give due regard to the promotion of equality across all protected groups when carrying out its functions.

It is a statistical fact that across the U.K. those belonging to protected groups tend to be the lowest paid. Irrespective of progressive tiering, any increase in pension contributions will result in an overall worsening of the financial position of the lowest paid. UCU believe that such increases are wholly unjustified.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply x

**Thank you for taking time to respond to this consultation.**

Completed questionnaires and other responses should be sent to the address shown below by 20 January 2014

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