

Bath & North East
Somerset Council

Avon Pension Fund

LOCAL GOVERNMENT PENSION SCHEME

Bath & North East Somerset Council
Floor 3 South, Riverside, Temple Street, Keynsham, Bristol, BS31 1LA
Tel: 01225 477000 ~ Fax: 01225 395258 ~ Email: pensionsedi@bathnes.gov.uk
Web: www.avonpensionfund.org.uk



Nicola Rochester
The LGPS Pension Team
5/G6
Department of Communities and Local
Government
Eland House
Bressenden Place
London SW1E 5DU

Ask for: Alan South
Telephone: 01225 395283
Fax: 01225 395258
Email: alan_south@bathnes.gov.uk
Our ref.: Pens/AGS
Your ref.: Nicola Rochester
Date: 24 May 2013

Dear Nicola,

Local Government Pension Scheme (Miscellaneous) Regulations 2013: Response to Consultation Annex D

This is the response from Avon Pension Fund to the consultation on the amendments required under the current .LGPS regulations issued in March 2013.

The majority of changes apply to specific employers where there is no need for a response.

Regulation 7 does however raise one issue on possible confusion with terminology.

It is understood that “person” can be legally accepted to cover business organisations that have been formally registered such as partnerships, corporations or associations.

However in the context of pension scheme regulations the term “person” is regularly used to define an individual who is or is not eligible to join the scheme. Indeed in Regulation 6 there are numerous references to this. It would be clearer if another term could be used in the new regulation 38 to distinguish between different entities. If this is not possible then perhaps a definition of “person” specifically included within this regulation.

Yours sincerely

Alan South
Technical Manager
Avon Pension Fund