

Local Government Pension Scheme 2014

Equality Statement

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1. Name of Directorate

Department for Communities and Local Government Local Government Finance Workforce, Pay and Pensions Division

2. Please list all the policy streams in your business area.

The Independent Public Service Pensions Commission published its final report on public service pensions in March 2011, setting out 27 recommendations to the Government on reform of public service pensions so that they could be made sustainable, affordable, and fair to both public service workers and the taxpayer. The Commission concluded that change was needed to make public service pensions schemes simpler, more transparent and fairer to those on low and moderate earnings¹.

The Government accepted the Commission's recommendations as a basis for consultation with public service workers, trade unions and others. One outcome of these talks was that there should be scheme level discussions alongside the central process to ensure a fuller understanding of the implications of reform for each individual scheme.

As part of these scheme level discussions for the Local Government Pension Scheme, the Government agreed that the Local Government Association and local government trades unions should come forward with a set of high level principles for the reformed Local Government Pension Scheme². Both parties accepted that any agreement should be subject to consultation with, and confirmation by, their respective memberships.

In February 2012, the Local Government Association and local government trades unions submitted detailed proposals for the design of a reformed Scheme based on the set of principles agreed earlier. This was followed by extensive and constructive discussions between Government, the Local Government Association and trades unions to ensure that the future service cost of the proposed scheme fell within the agreed 19.5 per cent cost ceiling³.

Informal consultations took place between June and August 2012 and resulted in overwhelming support. The proposals were supported by 93 per cent of employers; 90 per cent of UNISON members; 95 per cent of GMB members and 84 per cent of Unite members. The majority of other unions with members in the Local Government Pension Scheme also accepted the proposals.

Wider public consultations on the various aspects of Scheme design and regulations began in December 2012⁴ and are expected to continue until Scheme implementation in April 2014.

³ A copy of the LGPS 2014 - Joint Statement can be found at http://www.lgps.org.uk/lge/aio/19370393

A copy of the Independent Public Service Pensions Commission Final Report can be fount at http://www.hm-treasury.gov.uk/indreview johnhutton pensions.htm

² A copy of the principles paper can be found at http://www.lgps.org.uk/lge/aio/15431141

⁴ LGPS 2014 consultation documents can be found at https://www.gov.uk/government/organisations/department-for-communities-and-local-government/series/local-government-pensions

3. Identify any policy streams aimed at or impacting upon a Protected Group.

The Department has considered impacts, both positive and negative, of the proposed reforms to the Local Government Pension Scheme on the groups protected by equalities legislation.

These groups, with reference to their protected characteristics, are:

- Age
- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Race
- Religion or belief
- Sexual Orientation
- Gender
- Marriage and Civil Partnership

The reformed Scheme, of which public and private sector employees are members, will affect active members of the current 2008 Scheme and those who choose to become members of the 2014 Scheme in the future. Members who were ten years or less from the Scheme's Normal Pension Age as of 1 April 2012 will be largely unaffected by the reforms (see section on transitional protections).

All pensions in payment or built up before 1 April 2014 will be protected. The changes will not affect those who are currently in receipt of a pension or those who have left the Scheme with a deferred pension.

A summary of the proposed core parameters of the new 2014 Scheme, compared with the existing 2008 Scheme, are set out in **annex A**.

The impact of the Local Government Pension Scheme reforms (2014 Scheme) has been assessed using the current, 2008 Scheme as a baseline. However, the overall value of a pension depends on unique individual factors that are outside the structure of the Scheme itself. These factors include the period of employment, career progression, salary and personal financial decisions. The analysis provided therefore concentrates on the key features and reforms being introduced through the new 2014 Scheme.

This equalities analysis is based on available data, a high level summary of which is set out at **annex B**.

Transitional protections

The Government announced in November 2011 that those closest to retirement will see no change in when they can retire, or any decrease in the amount of pension they receive at their current Normal Pension Age.

Transitional arrangements will mitigate the effect of introducing reforms to the Scheme for older members approaching retirement. These arrangements recognise that pensions are typically a form of long term financial planning for retirement, and that members closer to retirement therefore have a more limited opportunity to make financial and lifestyle changes to lessen the impact of Scheme reforms. To protect those closest to retirement moving into the new 2014 Scheme, all members within 10 years of their normal retirement age as at 1 April 2012 will get a pension at least equal to that which they would have received under the 2008 Scheme.

In addition to transitional arrangements, all members' accrued rights from the 2008 Scheme are protected. This means that any service earned in the current final salary scheme before 1 April 2014 will retain the link to final salary and can be taken at the Normal Pension Age that would have applied under the current 2008 Scheme rules.

As part of these accrued rights, previously agreed protections will also continue. This includes the retirement age provisions for remaining members with the right to take a pension before age 65 without any actuarial reduction applying if they satisfy the rule of 85. This rule requires that at the point of leaving the Scheme, the member's age and service added together total 85.

Age

The Department recognises that only the older Scheme members; within up to ten years of their Normal Retirement Age on 1 April 2014; will benefit from future transitional protections. As set out above, this is because those closest to retirement would otherwise be disproportionately affected by the reforms as they would have less time to adjust their financial plans for retirement.

However, those closer to retirement are also more likely to have accrued a higher level of benefit in the 2008 Scheme and to have a lower retirement age. The transitional protections may therefore enable older members to receive a greater level of pension benefit than younger members.

The Department considers it appropriate that the transitional protections impact differently on members due to their proximity to expected retirement age. As set out above, the approach is necessary to protect those closest to retirement who are less able to respond to Scheme design changes and would otherwise be disproportionately affected by the Scheme reforms. Younger members will not benefit from the transitional arrangements, but have longer before retirement to adapt their long term financial plans.

Other Protected characteristics

The Department does not consider that transitional arrangements would have a differential impact on members of the Scheme due to disability; gender reassignment; pregnancy and maternity; race; religion or belief; gender; sexual orientation or marriage and civil partnership.

Pension age

As life expectancy has increased, so too has the average time that a public service pension is in payment. The Commission's report found that, whilst increases in life expectancy had normally been recognised in future projections, the actual rate of improvement had been consistently underestimated. The Commission therefore concluded that as it was not possible to be confident about longevity in the future, the most effective way of managing the risk of increasing longevity leading to rising costs, would be to link a member's Normal Pension Age to their State Pension Age.

The Normal Pension Age is the age at which members are expected to take their pension. Members can choose to retire before or after their Normal Pension Age, and where they do so, their pension benefits will be adjusted to reflect that. It is also the point at which deferred members of the Scheme can access their benefits.

As set out above, the new 2014 Scheme will link a member's Normal Pension Age to their State Pension Age. This means that if the member's State Pension Age rises, then their Normal Pension Age will also increase for all benefits accrued since the start of the 2014 Scheme.

Members falling outside of the transitional protections are very likely to see an increase in their Normal Pension Age for benefits accrued under the 2014 Scheme, regardless of any protected characteristics. General improvements in longevity across all protected groups mean any impact of the reforms is proportionate as people are living longer.

As people are living longer, the proportion of time spent in retirement has increased. The changes to normal pension age are therefore needed to rebalance the amount of time spent in active employment and the time spent in retirement. Whilst members unprotected by the transitional arrangements will need to work for longer, they will on average, still be able to enjoy a comparable period of time in retirement.

Mitigations are in place in the 2014 Scheme to enable those who do not wish to, or cannot, continue to work into older age. Those who would like to retire at their existing 2008 Scheme Normal Pension Age can take an early actuarially reduced pension. Those who need to retire early, for example on ill health grounds, may be entitled to compensatory provisions in the Scheme.

Gender

Figures from the Office for National Statistics show that mens' average life expectancy is four years less than that of women (78.1 for men compared to 82.1 for women). These figures also predict continuing improvement in life expectancy for both genders, so that for those born in 2035, the cohort life expectancy may be 94.2 for men and 97.2 for women⁵.

As women live longer on average, they are more likely to spend a greater period of time in retirement and to receive pension payments for longer, reducing the impact of the increase in Normal Pension Age. However, as trends in life expectancy have historically shown that women live longer than men, the changes brought about as a result of these

⁵ http://www.ons.gov.uk/ons/rel/lifetables/period-and-cohort-life-expectancy-tables/2010-based/p-and-c-le.html

reforms will not disproportionately impact one gender more than is currently the case.

Age

Younger members are likely to see a greater increase in their Normal Pension Age compared to older members, although they would continue to accrue pension benefits during that time. However, they are also expected to see a greater increase in life expectancy than those already close to retirement and so will spend a comparable time in retirement. As such, the changes to the Scheme should ensure that all members continue to spend an appropriate balance of time in retirement and at work.

There is no anticipated overall negative impact as younger members are expected to live longer and therefore could continue to accrue pension benefits and spend a comparatively similar time in retirement as current members.

Race

Projections of life expectancy by ethnicity are not available for Scheme membership. The Department for Work and Pensions considered the impact of the increase in State Pension Age to 67 on ethnic minorities in its Impact Assessment, published December 2011, but concluded that robust projections of life expectancy data by ethnicity were not available. On this basis, the Department considers that it cannot reach a view on whether any particular ethnic group will be disproportionately affected by the changes to the Normal Pension Age.

Disability

Data examining life expectancy for members with or without a disability is unavailable for the Scheme. The Department for Work and Pensions also considered the impact of increasing State Pension Age for those who have a disability. It concluded that the disabled could be affected disproportionately in their ability to adjust to change, where they faced greater obstacles in remaining in employment.

However, the 2014 Scheme contains extensive provisions for those needing to retire before the Normal Pension Age on the grounds of ill-health. These provisions are specifically designed to protect members who need to retire early for health reasons, by ensuring that they receive a fair and broadly comparable pension to those able to work until Normal Pension Age. The provisions for ill-health retirement will continue unchanged from the 2008 Scheme. On this basis, the Department considers that whilst members with a disability and not subject to the transitional protections may be disproportionately affected by the increase in Normal Pension Age, the Scheme's provisions for ill-health retirement should help to mitigate this impact.

Other protected characteristics

The Department does not consider that changing the Normal Pension Age would have a differential impact on members of the Scheme based on their gender reassignment, pregnancy and maternity, religion or belief, sexual orientation or marriage and civil partnership.

Career average pension scheme design

As part of it review of public service pensions, the Commission found that higher earners tended to benefit disproportionately from existing final salary schemes, such as the 2008 Scheme. This is because they could see a sudden increase in earnings at the end of a career that greatly increased the overall value of the pension benefits. The Government has therefore decided to address the fairness gap that exists in final salary arrangements between those who have flatter career paths compared with higher earners.

The Commission concluded that scheme design relating to average earnings over the whole of a member's career provided the fairest and most sustainable scheme design. In fact, they found that the lowest paid decile of public service workers could benefit by around 30 per cent under a career average design if working a full career, whereas the top decile of earners could lose around 4 per cent of benefits compared to a final salary scheme.

The 2014 Scheme will therefore move to a career average form of defined benefit. This means that members' benefits will accrue each year in relation to their salary for that period, rather than being determined as a proportion of final salary. Members covered by transitional protections will also accrue pension on a career average basis. However this amount would then be compared with what they would have accrued on a final salary basis and the higher amount awarded.

Gender

As set out above, moving from a final salary scheme to a career average scheme will disadvantage high earners. Within the Local Government Pension Scheme, men represent a marginally higher proportion of those earning higher salaries. For example, 4.6 per cent of Scheme members are men earning more than £35,000, compared to 3.8 per cent for women (although only 25 per cent of all scheme members are men).

However a career average structure is considered to offer the fairest outcome across all groups. Evidence submitted to the Commission suggested that higher earners have a better capacity for self-provision of pension benefits than lower paid workers. Higher earners may therefore have greater capacity to develop additional forms of savings and investment which can be used to supplement their Scheme pension.

In recognising that a career average scheme provides a fairer outcome for all members, the Department considers that the marginal negative impact on men compared to women resulting from the move to career average is proportionate.

Age

As benefits may accrue at a faster rate under the 2014 Scheme, older members who could continue to link their benefits to their final salary might be better off adopting a career average benefits sctructure. To ensure that they are not unfairly impacted by the offer to protect the link to final salary, the transitional arrangements allow members to

determine their pension under both mechanisms and take whichever is higher.

As set out in the section on transitional protections, the Department considers that the additional protection afforded to older members of the Scheme is necessary as they have less time to make changes to the long term financial plans for retirement. It also judges that the greater impact on those further from retirement is proportionate, as they will be able to accrue pension for longer at the faster rate under the career average scheme.

Other protected characteristics

The Department does not consider a differential impact of a career average pension scheme design on members of the Scheme based on race, disability, gender reassignment, pregnancy and maternity, religion or belief, sexual orientation or marriage and civil partnership.

Contribution rates

The employee contribution rates, (as set out at annex A), were agreed with the Local Government Association and the local government trades unions as part of the development of the 2014 Scheme. The agreed rates meet a target employee contribution yield of 6.5 per cent, ensuring that the average member contribution to the new 2014 Scheme will be the same as the old 2008 Scheme (6.5 per cent).

Contributions (and benefits) in the new Scheme will be based on actual pensionable pay rather than full-time equivalent pay which is currently used in the 2008 Scheme. This will impact part-time workers whose pensionable pay will no longer be converted into a full-time equivalent figure to determine their contribution rate. As a result, part-time workers may see their contribution rate go down.

In line with other public service pension schemes, the Department considers that high earners should pay a higher rate of contribution towards the cost of the Scheme in order to help ensure the long term viability and affordability of the Scheme from April 2014 onwards. This is also needed in light of the changes to the definition of pensionable pay in order to maintain the average employee contribution rate of 6.5 per cent and protect lower earners. All members earning more than £43,001 and continuing to earn pension benefits will therefore be required to pay a higher contribution rate than is currently the case, regardless of transitional protections or protected characteristics.

These new contribution rates are in line with Government policy to protect, either partially or fully, the contribution level paid by members earning less than £21,000. As 77 per cent of Local Government Pension Scheme members earn £25,000 or less, this inevitably results in a greater burden on middle and high earners.

Gender

The proposed employee contribution rates for the 2014 Scheme will result in increased contributions for those on salaries of £43,001 or more, when compared to the 2008 Scheme. This will have a marginally greater effect on men (see table 6 annex B) as 1.8 per cent of Scheme members earning more than £45,001 are men compared to 1.1 per

cent who are women. (A salary of £45,001 has been used as data is not held on membership of the Scheme earning £43,001 or more). However, overall the vast majority of Scheme members of both genders will either pay the same or lower contribution rates.

Recognising the importance of protecting lower paid workers, and noting the very small difference between the number of men and women affected, the Department considers that the relative negative impact of increased contribution rates of the 2014 Scheme on men compared to women is proportionate.

The switch to actual pensionable pay is likely to have a disproportionate positive effect on women who represent 87 per cent of part-time workers in the Local Government Pension Scheme. However the Department considers this proportionate and in line with Government intentions to protect lower paid workers, which will include high numbers of part-time workers.

Age

Increased contributions for higher salaried members would also be less likely to affect younger workers who would have had less time to progress their careers and so more likely to be on lower salaries at this time. However, as the Department has set out transitional arrangements to ensure those closest to retirement are not unfairly disadvantaged by the Scheme reforms, it considers that this marginal benefit for younger members is proportionate.

Other protected characteristics

The Department does not consider a differential impact of increased contribution rates on members of the Scheme based on disability, gender reassignment, pregnancy and maternity, race, religion or belief, sexual orientation or marriage and civil partnership.

50/50 option

The proposed 2014 Scheme has a new option that will allow eligible members to elect to pay half the contribute rate and receive half of the benefit for that period in return. It is intended that this option will require renewal after a limited time and is not designed to replace long term membership of the full Scheme. Participating members will still retain the full value of other ancillary benefits such as the death in service lump sum.

The proposed option is primarily aimed at those who may not be able to afford contributions for a short period of time to encourage continued membership - instead of opting out of the Scheme altogether. Although this is a new option, it is expected that lower paid workers with less disposable income are more likely to make use of this provision.

As this option will be available to all members equally the Department does not consider a differential impact of the proposed 50/50 option on members of the Scheme based on age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sexual orientation, gender or marriage and civil partnership.

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Survivor benefits will continue to be payable to surviving partners irrespective of gender or marital status. This feature is carried on from the 2008 Scheme to ensure equality between groups.

Councillor pensions

Proposals on access to the Scheme by councillors and other elected office holders are currently under consideration following consultation and will be assessed separately.

4.	Who h	as res	ponsibility	for	develo	ping	these	policies'	?
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Chris Megainey, Deputy Director of Workforce Pay and Pensions
Robert Holloway, Reform of Local Government Pension Scheme Team Leader

The policy has been developed in line with broader public service pension scheme policy, on which HMT is the Department with lead policy responsibility.

5. Are there any EU or other statutory regulations that need to be adhered to regarding equalities?

Equality Act 2010 and the Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000.

6. The following summary will be analysed and used as evidence which you considered in demonstrating due regard to the Public Sector Equality Duty. Have you used information from any of the following sources when developing policies?

Throughout the reform process extensive scheme level discussions have been made with external partners. In particular, a Project Board comprising representatives from the Local Government Association, the Department and three of the major local government trades unions: Unite, Unison and the GMB was set up to allow the sector greater input to the design of the Scheme.

Considerable amounts of data has been received and analysed from public statutory consultations on various aspects of scheme design and regulations including:

- Local government pension scheme 2014: draft regulations on membership, contributions and benefits
- Local Government Pension Scheme 2014 and 2008 Scheme amending Regulations
- Local Government Pension Scheme 2014
- Taxpayer-funded pensions for councillors and other elected local office holders

Reports and assessments on various aspects of pension reform have been assessed including:

- Independent Public Service Pensions Commission: Final Report
- HM Treasury. Public Service Pension: central equalities impact analysis
- Diverse Cymru. LGPS 2014 Equality Impact Report
- Pensions Policy Institute. Retirement Income and Assets: the implications for retirement income of Government policies to extend working lives
- Department of Work and Pensions. Long term State Pension sustainability: increasing the State Pension age to 67
- Local Government Pension Scheme 2014 Impact Assessment

Data has been used from various sources including:

- Local Government Pension Scheme Funds Statistical Release
- Local Government Demographics 2010 analysis and research
- Data received for the 2010 National Model Fund valuation
- Office for National Statistics labour force and pension trends data

7. Have you discovered any of the following and as a consequence taken actions on identified equality issues?

The Department does not consider that the common features of the 2014 Scheme will result in any substantial differential impacts to persons with the protected characteristics of gender reassignment; pregnancy and maternity; race; religion or belief; sexual orientation and marriage and civil partnership.

Provisions may impact persons differently by virtue of their age; disability and or gender. However the Department does not consider that these impacts are unlawful or disproportionate.

All members will continue to receive a high quality pension with a guaranteed payment in retirement regardless.

Most members, in return for working longer, will see no reduction in the pension income they receive at the 2014 Scheme Normal Pension Age and many low and middle income earners will receive a better pension than they do now.

The Department believes that there remains a strong economic rationale for all members, including all groups protected by equalities legislation, to continue active membership of the Local Government Pension Scheme.

8. When your policies are finally implemented which groups are most likely to benefit?

Older members of the Scheme, lower paid and part-time workers are most likely to benefit from pension scheme reform. As before, the Government considers this proportional.

9. In considering the above information have any gaps in data or equalities information been identified?

The Department has identified some gaps in information on some protected characteristics; in particular: gender reassignment, pregnancy and maternity, religion or belief, sexual orientation and marriage and civil partnership.

The Department will keep under review the need for extra data collection.

10. Overall, can you make an assessment of the potential of this policy; programme/service to have a substantial equalities impact on discrimination, fostering good relations or advancing equality of opportunity? Please try to limit your answer here to less than an A4 page.

The proposed reforms to the Local Government Pension Scheme are not expected to have any substantial equalities impact on discrimination, fostering good relations or advancing equality or opportunity.

This analysis was undertaken by Jason Cotton and Robert Holloway

SCS Sign off: Chris Megainey

I have read the available evidence and I am satisfied that this demonstrates compliance, where relevant, with Section 149 of the Equality Act and that <u>due regard</u> has been made to the need to: eliminate unlawful discrimination; advance equality of opportunity; and foster good relations.

Please keep a record of this analysis for audit purposes and send a copy to errol.barnett@communities.gsi.gov.uk for his records

Annex A – LGPS 2014/2008 comparison

	Proposed LGPS 2014	LGPS 2008
Scheme design	Career Average Revalued Earnings (CARE)	Final Salary
Pension age	State Pension Age (minimum 65)	65
Accrual Rate	1/49 th	1/60 th
Revaluation Rate	Inline with price index - currently Consumer Price Index (CPI)	Based on final salary
Employee Contribution Rate	Tiered contributions in line with salary - average 6.5% (see following table)	Tiered contributions in line with salary - average 6.5% (see following table)
Contribution flexibility	Option to pay 50% contributions for 50% benefit	No
Early/late retirement	55 - 75 on an actuarially neutral basis	55 - 75 on an actuarially neutral basis
Pension in payment adjustment	Inline with a price index - currently CPI	CPI (RPI for pre 2011 increases)
Optional lump sum commutation rate	£12 lump sum for £1 pension	£12 lump sum for £1 pension
Death in service lump sum	3 x pensionable pay	3 x pensionable pay
Death in service surviving partner benefits	1/160 th accrual	1/160 th accrual
III health retirement	Tier 1 – immediate payment with membership enhanced to Normal Pension Age Tier 2 – immediate payment of pension with 25% membership enhancement to Normal Pension Age Tier 3 – temporary payment of pension for up to 3 years	Tier 1 – immediate payment with service enhanced to Normal Pension Age (65) Tier 2 – immediate payment of pension with 25% service enhancement to Normal Pension Age (65) Tier 3 – temporary payment of pension for up to 3 years
Vesting period	2 years	3 months
Transitional protection	Accrued rights protected and past benefits linked to final salary when members leave the scheme - Protection underpin for members aged 57 to 59 - Rule of 85 protection (as in 2008 Scheme)	N/A

Employee contribution rate comparison

Pensionable allowance range	Contribution rate 2014 Scheme (%)
Up to £13,500	5.5
£13,501 to £21,000	5.8
£21,001 to £34,000	6.5
£34,001 to £43,000	6.8
£43,001 to £60,000	8.5
£60,001 to £85,000	9.9
£85,001 to £100,000	10.5
£100,001 to £150,000	11.4
£150,001 or more	12.5

Pensionable allowance range	Contribution rate 2008 Scheme (%)
Up to £13,500	5.5
£13,501 to £15,800	5.8
£15,801 to £20,400	5.9
£20,401 to £34,000	6.5
£34,001 to £45,500	6.8
£45,501 to £85,300	7.2
£85,301 or more	7.5

Annex B – Local government employees' and Scheme data

Figures from tables 1 to 4 are from the Local Government Demographics 2010 analysis and research. These figures were correlated using the total headcount of 2,244,400. Data is unavailable on the impact of recent restructuring of the local government workforce.

Table 1: Employment distribution by gender and work pattern

	Full-time (%)	Part-time (%)	Total (%)
Male	18	7	25
Female	28	47	75
Total	46	54	100

Table 2: Ethnic group of local government employees

Ethnic group	Percentage
White	91.8
Mixed	1.2
Asian	3.0
Black	3.2
Other	0.8

Table 3: Age profiles of local government employees

Age bands	Percentage
24 and under	5.9
25-34	14.7
35-44	26.7
45-54	31.8
55-64	18.6
65 and over	2.3

Table 4: Breakdown of disability status of local government employees

Disability status	Percentage
DDA disabled and work-limiting disabled	5.7
DDA disabled	7.3
Work-limiting disabled only	2.7
Not disabled	84.3

^{*}DDA (Disability Discrimination Act)

Tables 5 and 6 show distribution of Local Government Pension Scheme actives as on 31 March 2010 (based on data received for the 2010 National Model Fund valuation) from the Government Actuary's Department.

Table 5: Age profiles of members of the Local Government Pension Scheme

Age Band	Proportion of Males (%)	Proportion of Females (%)	Total (%)
18-24	1.2	2.1	3.3
25-34	4.4	10.3	14.7
35-44	6.2	20.5	26.7
45-54	8.7	25.9	34.6
55-64	7.1	13.6	20.7
Total (5)	27.6	72.4	100

Table 6: Salary groups of members of the Local Government Pension Scheme

Salary group (£)	Proportion of Males (%)	Proportion of Females (%)
Up to 5,000	1.6	14.7
5,000-15,000	3.5	26.0
15,001-25,000	11.4	19.5
25,001-35,000	6.8	8.1
35,001-45,000	2.8	2.7
45,001-55,000	0.9	0.7
55,001-65,000	0.4	0.2
65,001-75,000	0.2	0.1
75,001-100,000	0.2	0.1
100 000+	0.1	0.0
Total	27.9	72.1

