Official Response to the

Teachers’ Pension Scheme Miscellaneous regulations consultation

January 2025

About Community

Formerly PAT/PANN and latterly Voice, the Education and Early Years section of **Community** represent thousands of serving teachers and support staff, headteachers, lecturers, nursery and early years workers, nannies and other education professionals in schools and academies, nurseries and early years settings, colleges and universities across the whole of the UK.

We provide legal and casework support to our members and regularly engage with them in determining our response to policy proposals.

Community is affiliated to the Trades Union Congress (TUC), to the Irish TUC, Scottish TUC and Welsh TUC as well as the General Federation of Trades Union (GFTU).

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As such this is a public document which will be published on our website following the consultation close.

The information shared within this response may be used and quoted as appropriate for the purposes it was gathered, and Community Union should be acknowledged as a contributor. We would be happy to discuss the comments in this response with the DfE or a research body acting on its behalf using the contact details supplied.

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Background and context

1. The TPS provides pensions and other benefits to teachers in England and Wales. The scheme is made up of three distinct sections. There are two final salary pension sections, with a normal pension age of 60 and 65 respectively, provided for under the Teachers' Pensions Regulations 2010 (the 2010 regulations) (SI 2010/19990). Both final salary sections closed to further accrual on 31 March 2022. The third is a career average revalued earnings section (CARE), with a normal pension age of State Pension Age or age 65 whichever is the later date, provided for under the Teachers' Pension Scheme Regulations 2014 (the 2014 regulations) (SI 2014/512). As of 1 April 2022, all active members of the TPS are accruing pension in the career average section.

2. In addition to the 2010 and 2014 regulations, there are also the Teachers' Pension Scheme (Remediable Service) Regulations 2023 (the 2023 regulations) (SI 2023/871). These regulations are to rectify the age discrimination that was identified with public service pension schemes reforms introduced in 2015 in the McCloud case.

3. This document explains the purpose and effect of the provisions set out in the draft regulations, which are available alongside this document on GOV.UK. The draft amendments are intended to:

    - rebalance member contribution tiers to ensure the required yield of 9.6% continues to be met;
    - update certain named employers for service pensionable on election following legislation updates;
    - add certain named employers for service pensionable without an election following the establishment of new organisations;
    - clarify the longstanding policy position or make minor corrections to wording to ensure the intended operation of scheme rules;
    - extend Fair Deal provisions to FE establishments where appropriate in response to the reclassification of this sector; and
    - address minor administrative processes and procedural updates.

Consultation Questions

- Do you agree that the proposed amendments to the TPS regulations deliver the policy objectives as set out in the consultation document?
- If 'no', why?
- Are there any changes needed to ensure the proposed amendments deliver the policy objectives?
- Are there any equality impacts arising from the proposed amendments that the Department has not identified and needs to take account of?
- Are there any additional comments you wish to provide regarding the proposed amendments to scheme regulations?

We would like to hear your views on our proposals.

Response from Community:

We agree that the proposed amendments to the TPS regulations will deliver the policy objectives as set out, however we do have some concerns about the recent significant changes to the Scheme.

In particular we have concerns that the constant changes to the Scheme and the increases in individual and employer contributions are increasingly making the Scheme unviable, especially for Early Career Teachers and part timers. We acknowledge that these proposals do not change the contribution rates for those in the lowest tier, however, cost-of-living increases and rampant inflation have caused significant difficulties for many teachers and when coupled with student loan contributions, energy cost increases and mortgage rates it is increasingly difficult for many to justify pension contributions.

And it is not just those on the lowest tier, the effect to those in the middle tiers, particularly those that are at the lower end of Tier 2, especially in major urban areas is significant.

Because these changes have had a negative impact on the youngest teachers, and these proposed changes will only have an impact on older and more established teachers we believe that there may be an equality impact which will need careful consideration.

Finally, we are concerned about the number of independent schools withdrawing from the Scheme, which reduces the number of contributors and further weakens the integrity of the overall Scheme for existing members. This is particularly exacerbated as the employer contribution rates increase making the Scheme less attractive and potentially unviable in some instances.

TPS Member Contribution Tiers

Introduction

4. The TPS is a defined benefits scheme, with the amount of pension received being linked to teachers' salary and service. Benefits are amongst the best available and form an important part of the overall remuneration package for teachers. The scheme, like most of the public service pension schemes, operates on a 'pay-as-you-go' basis, with current benefit payments being funded from current employer and employee contributions and any shortfall met from wider public funding/taxation.

5. TPS members are required by legislation to collectively contribute 9.6% of their pay towards scheme benefits. A small adjustment to the tiered member contribution structure is required to ensure that the 9.6% yield will be achieved in the current valuation period.

Background

6. The TPS is a contributory scheme, meaning that members and their employers are required to pay towards the cost of benefits that are built up. An actuarial valuation is carried out, normally every four years, to ensure the level of contributions made by members and employers appropriately meet the cost of pension rights as they are accrued.

7. Employers currently contribute 28.6% of a member's pensionable earnings towards the cost of scheme benefits. Members are required collectively to contribute 9.6% across the whole scheme membership, which is referred to as the member contribution 'yield'. The member yield of 9.6% is factored into the benefits structure and costings of the scheme.

8. While the yield is a fixed percentage, there are a range of approaches that could be taken to ensure that 9.6% is collected from across the whole scheme membership. The simplest method is to require each member to contribute a flat rate of 9.6%. An alternative is to share out the 9.6% requirement across the workforce by charging a sliding scale of rates to members according to their pensionable earnings with the aggregate amount collected across members adding up to 9.6%. This is known as 'tiered contributions' and is the method adopted across most public service pension schemes in the UK.

9. In the 2011 final report, the Independent Public Service Pensions (IPSPC) recommended a tiered contribution approach for the new CARE schemes, to

reflect the differing characteristics of higher and lower earners. This recognises the mutual intention of the schemes and the continuing desirability to facilitate participation across the whole workforce, having regard to potential affordability concerns for lower earners. The considerations outlined in the IPSPC report apply equally to the TPS.

10. The tiering of member contributions has allowed the TPS to reduce potential financial barriers amongst lower earners and encourage staff at all stages of their teaching career to participate in the pension scheme. It has helped to minimise non-participation in the scheme and ensure that it remains sustainable and affordable to all members.

Current employee contribution rates

11. The TPS has 6 contribution tiers ranging from 7.4% for the lowest earners to 11.7% for the higher earners.

12. While this structure has been in place since 2015 and the contribution rates have remained the same, the pay bands have increased annually in line with the Consumer Prices Index (CPI). The result is that the current structure, covering 1 April 2024 to 31 March 2025, is as follows:

Annual Salary	Member Contribution Rate
£0 - £34,289.99	7.4%
£34,290.00 - ££46,158.99	8.6%
£46,159.00 - £54,729.99	9.6%
£54,730.00 - £72,534.99	10.2%
£72,535.00 - £98,908.99	11.3%
>£98,909.00	11.7%

Changes to the contribution structure from 1 April 2025

13. The 2020 scheme valuation carried out by the Government Actuary's Department (GAD) was concluded in 2023. As part of that process an assessment was made of the existing member contribution structure and whether it is likely to meet the contribution yield over the valuation implementation period which, due to the complexity of the Transitional Protection remedy, was amended to 1 April 2024 to 31 March 2027.

14. The estimated yield from modelling of the current member contribution structure is 9.45%, primarily because of the member contribution tier thresholds increasing at a higher rate (based on CPI) than average salary growth, which has affected the expected distribution of the membership in the contribution tiers. Action is therefore required to re-set the structure to ensure that the required yield of an average of 9.6% will be achieved.

15. The Department has worked closely with GAD and the Teachers' Pension Scheme Advisory Board (SAB) on the potential changes that could be made. The SAB is a statutory board of member and employer representative which provides advice to the Secretary of State on potential changes to TPS rules.

16. Several options were modelled in line with the policy principles determined in consultation with the SAB, which included protection of the lowest paid, fairness for all members, ease of member understanding and minimising the administrative burden on scheme employers.

17. Following extensive consideration of the options that were discussed and modelled, including those put forward by the SAB, the unanimous recommendation which was accepted by the Department is to retain the current 6-tier structure with the forecast shortfall met by an increase of 0.3 percentage points (p.p.) for tiers 2-6. The contribution rate for the lowest tier, which currently covers those earning up to £34,290 (and to be increased in April 2025 with the applicable rate of CPI), would not be increased.

18. The SAB made its recommendation with the particular aim of seeking to ensure teachers continue to participate in the scheme, given it is such a valuable part of the overall reward package, and recognising the proposed changes best balance the need to ensure that the scheme remains sustainable whilst making sure it is affordable to members at all stages of the profession.

19. The table below details how the current structure would be updated from 1 April 2025.

Annual Salary Bands (1 April 2024*)	Current Member Contribution Rate	Member Rate from 1 April 2025
0 - £34,289.99	7.4%	7.4%
£34,290.00 - £46,158.99	8.6%	8.9%
£46,159.00 - £54,729.99	9.6%	9.9%
£54,730.00 - £72,534.99	10.2%	10.5%
£72,535.00 - £98,908.99	11.3%	11.6%
> £98,909.00	11.7%	12%

*As per existing scheme rules, the pay thresholds will be updated on 1 April 2025, and each subsequent April, when the applicable rate (based on CPI) is known.

20. Whilst the particular circumstances of a member will determine the precise effect, the estimated impact on take-home pay (i.e. after tax relief has been applied) for the majority of members is shown in the example table below:

Example Salary	Net effect (Annual)	Net effect (Monthly)
£30,000	£0	£0
£40,000	£96	£8
£50,000	£120	£10
£65,000	£117	£10
£85,000	£153	£13
£110,000	£198	£17

Proposed amendment

21. To apply the proposed changes, scheme rules will need to be amended via a change to scheme regulations.

22. Draft regulation 4 of the Teachers' Pension Scheme (Amendment) Regulations 2025 would amend The Teachers' Pension Scheme Regulations 2014, to implement a new employee contribution rate from 1 April 2025.

Respondents are asked to consider whether;

- the amendments achieve the stated policy aim as outlined above?
- there any consequences of making these changes that are not highlighted in this consultation document?
- there are any other comments?

Response from Community:

Community acknowledge that the amendments proposed do achieve the stated policy aim, however although the amendments do protect the lowest earners somewhat, we still have concerns about the overall level of contributions.

As mentioned above, we have concerns that the Scheme is becoming increasingly unattractive for Early Career Teachers and part timers. We acknowledge that these proposals do not change the contribution rates for those in the lowest tier, however, cost-of-living increases and rampant inflation have caused significant difficulties for many teachers and when coupled with student loan contributions, energy cost increases and mortgage rates it is increasingly difficult for many to justify pension contributions. And the situation is more concerning for those in the middle tiers, particularly those that are at the lower end of Tier 2, who will see less of their income in the pay packet.

Because these changes have had a negative impact on the youngest teachers, and these proposed changes will only have an impact on older and more established teachers we believe that there may be and equality impact which will need careful consideration.

Fair Deal

Introduction

23. Fair Deal is a non-statutory policy which maintains access to public service pension schemes where employees are transferred from the public sector to a private sector employer under TUPE terms. Scheme regulations must allow for bodies that employ transferred employees to continue to participate in the scheme.

Background

24. In Autumn 2013, HM Treasury confirmed its Fair Deal Policy and published guidance about the pension provision of staff who are compulsorily transferred from central government to independent providers delivering public services. The guidance provides that public sector employees, who are members (or eligible to be members) of a public service pension scheme and are compulsorily transferred to a private sector body, will retain access to their public service pension scheme.

25. In accordance with the policy, the TPS 2014 regulations contain provisions that allow teaching staff transferring from a public to a private sector organisation under the Transfer of Undertakings (Protection of Employment) Regulations 2006/246 to retain their membership of the TPS. Currently, these provisions only apply to members transferring from a maintained school, academy, or a non-maintained special school to a private sector organisation.

26. When developing the policy in 2013, HM Treasury considered the application of Fair Deal for those employed within the Further Education (FE) sector. It was determined that Fair Deal should not extend to the FE sector as they were deemed at that time to be private sector bodies.

27. In November 2022 the Office for National Statistics (ONS) reclassified FE colleges as public sector organisations. Following this change, HM Treasury has proposed that the Fair Deal policy should be updated to include FE establishments going forward.

28. To enable this policy update, pending the outcome of HM Treasury's consultation, the Department will need to amend the TPS regulations. The amendment will extend the existing Fair Deal provisions to employees of FE establishments who are already members (or eligible to be members) of the TPS and whose contract transfers to a new employer. This will allow them to retain

access to the scheme, while they remain employed on that public service contract.

Proposed amendments

29. As a result of the reclassification and the resulting policy change, continuing access to the TPS will be permitted for employees of FE establishments where the transfer provides for this. Draft Regulation 6 amends Part 1 Schedule 1 of the TPS 2014 Regulations to reflect this change.

Respondents are asked to consider whether;

- the amendments achieve the stated policy aim as outlined above?
- there any consequences of making these changes that are not highlighted in this consultation document?
- there are any other comments?

Response from Community:

Community is really pleased to see this amendment to the regulations which will afford teachers working in FE vital protections and maintained access to the pension scheme should their employer transition to a private one whilst they remain employed on that public service contract.

We hope that there will be interest from FE establishments in joining (or rejoining) the TPS for the benefit of their teaching staff but also to increase the number of contributors which will safeguard the longevity of the Scheme as a whole.

Minor Miscellaneous Amendments

30. Further amendments are proposed to make minor amendments and drafting corrections as follows:

Diocesan Boards of Education Measure

31. Following the enactment of the Diocesan Boards of Education Measure 2021, both the 2010 and 2014 regulations need to be amended to reflect the latest enacted legislation. Schedule 2, Part 2, Paragraph 17(a) of the 2010 regulations and Schedule 1, Part 3, Paragraph 26(a) of the 2014 regulations are to be amended accordingly by draft regulations 2 and 7(a).

National Institute of Teaching

32. Draft Regulation 7(a) is required to enable the National Institute of Teaching (legally recorded at Companies House as “School Led Development Trust”) to participate in the TPS. They currently participate under a provision for temporary acceptance as they do not qualify for acceptance into the scheme against any of the regulation categories for eligible organisations and employers.

Employer Contribution Payments

33. Following the rollout of the Monthly Contribution Reconciliation (MCR) process, the contribution pay-over day for employers has moved from the 7th to the 15th of each month. This process change was conducted alongside HM Treasury, including a consultation with different internal and external stakeholders, to ensure impacts on cashflow were fully considered and realised, but changes need to be implemented in TPS regulations to reflect the change of date. Draft Regulation 5 amends Part 9, Chapter 5, Regulation 196 of the 2014 regulations to reflect this date alteration.

Remediable Service – divorce and dissolution of marriage

34. The Teachers’ Pension Scheme (Remediable Service) Regulations 2023 include provisions to rectify discrimination identified when the main public service pension schemes were reformed in 2015. The regulations outline how Cash Equivalent Transfer Values (CETVs) provided to the Court in divorce and dissolution proceedings during the remedy period should be recalculated. This recalculation is necessary to reflect that affected members have a choice of benefits (final salary or career average) for their service between 1 April 2015 and 31 March 2022 (the remedy period).

35. Regulation 19(3)(b) was included to explain how a CETV used to determine a Pension Sharing Order should be recalculated in the alternative scheme for protected and unprotected members. However, it was later identified that this provision is redundant as 19(3)(a) applies to protected and unprotected members and further provisions are included in relation to the calculation of CETVs that were originally calculated based on 'mixed service.'

36. Draft regulation 10 amends Regulation 19 of the Teachers' Pension Scheme (Remediable Service) Regulations as there is a risk the policy intention will be misinterpreted, and the regulation applied incorrectly without this amendment.

Respondents are asked to consider whether;

- the draft regulations achieve the stated aims of the amendments?
- there are any consequences of making these changes that are not highlighted in this consultation?
- there are any other comments?

Response from Community:

Again, as noted before, these draft regulations do achieve the stated aims of the proposed amendments, however it is vital that these amendments, which will all occur behind the scenes, are carefully implemented to ensure they do not disrupt the regular receipt of contributions from members and employers, or payment of pensions to members.

Because of the increase in employer types and the variance in pay date etc. there will need to be clear communication between the pension scheme and employers to ensure that all are acutely aware of the changes to the contribution pay-over day and steps put in place to ensure the smooth transition to the later date.

On top of these amendments we are concerned that there are significant delays to queries relating to the current pension service and the rate of resolution of complaints. In particular we are concerned about issues arising from the McCloud judgements that are affecting members' ability to claim their pension and those who are in the process of legally dividing properties through separation and divorce settlements. The current waiting time for dealing with CETV/PSO is ludicrous and needs to be dealt with in more timely manner to prevent publicity from having a negative impact on the Scheme.

Public Sector Equality Duty

37. The Public Sector Equality Duty (PSED) requirements are set out in s.149 of the Equality Act 2010. The PSED requires a public authority to have due regard to the need to:

    - eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010.
    - advance equality of opportunity between people who share a protected characteristic and those who do not; and
    - foster good relations between people who share a protected characteristic and those who do not.

38. These aims are also known as the three limbs of the PSED. This involves having due regard to the need to remove or minimise disadvantages suffered by people due to their protected characteristics and take steps to meet the needs of people from protected groups where these are different from the needs of other people.

39. The equality duty covers nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership1, pregnancy and maternity, race (ethnicity), religion or belief, sex, and sexual orientation.

40. Understanding the possible impact that policy decisions could have on different groups helps us to identify, avoid and manage negative equality impacts. Consideration of the impact of the changes that are subject to consultation is ongoing with the minor miscellaneous amendment and changes not being thought to adversely affect any group as they do not introduce any changes to the longstanding policy positions. The Department has considered the impact of the changes to the Fair Deal policy on those with protected characteristics and we do not believe there are any specific impacts on these groups as the policy applies to all members in the same way. This summary of the Department's assessment is therefore focused on the changes to the member contribution structure.

41. The equality duty is an ongoing duty and we will continue to consider and amend this assessment until the final regulations are made.

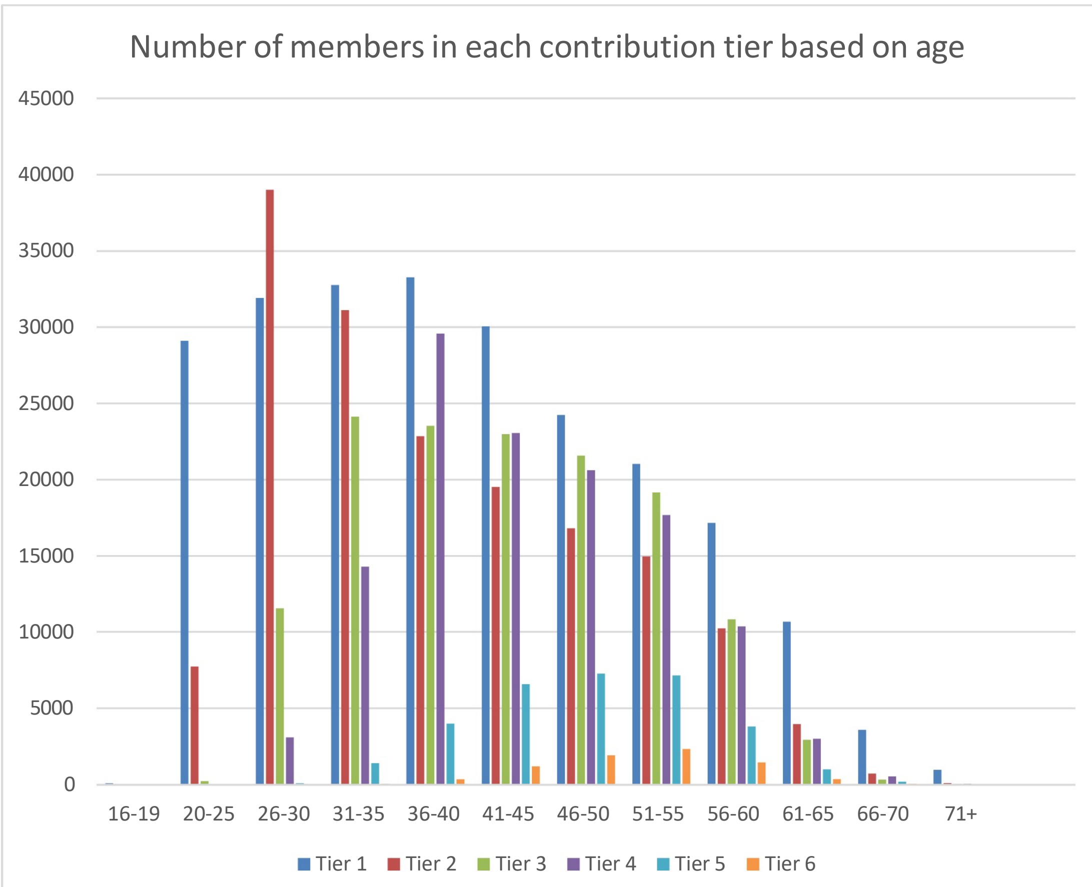
[1] Only assessed in relation to the first limb of the PSED

Assessment

42. The key policy change proposed in this consultation is the change to the member contribution structure (page 6), and the PSED analysis is summarised in this section. The change could affect all active members of the scheme over the current valuation period – this is approximately 690,000 members[2].

Age

43. The graph and table below outline the number of active members in each contribution tier according to their age (based on service from 1/2/2023 to 31/1/2024).[3]



[2] As at 31 January 2024

[3] These figures are based on actual earnings and include both full time and part time members.

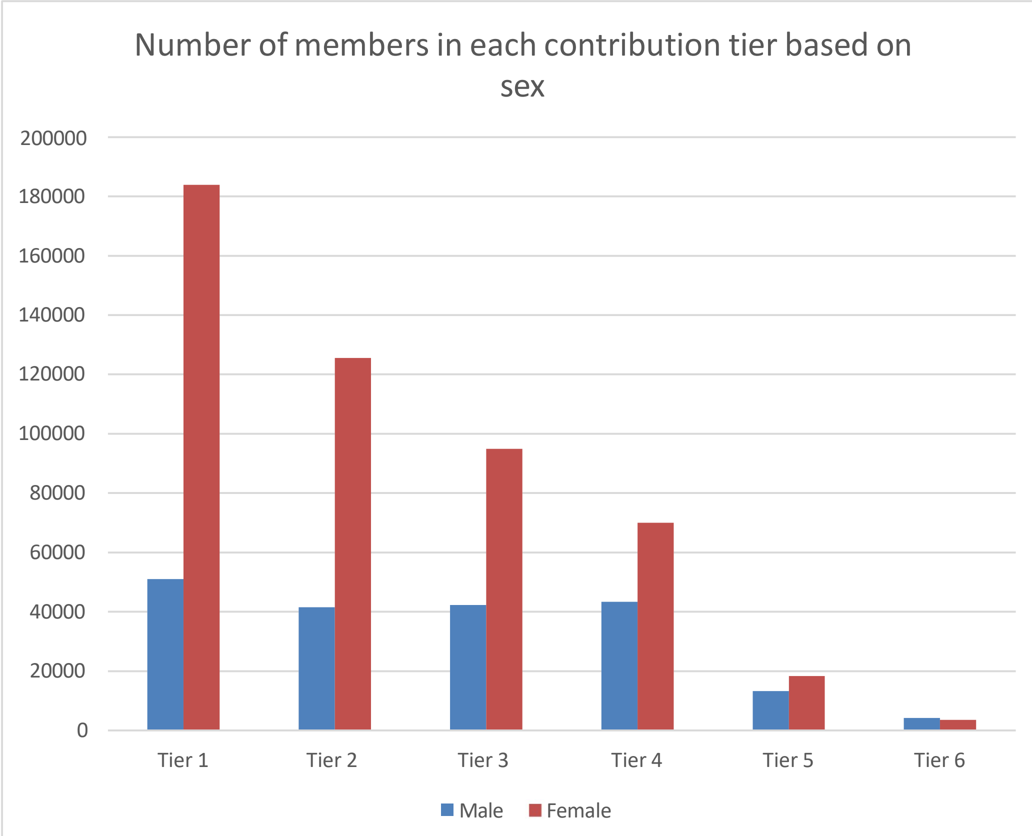
Age band	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Tier 6
16 – 19	104	1	0	0	0	0
20 – 25	29,103	7,732	234	24	1	0
26 – 30	31,942	39,022	11,542	3102	105	5
31 – 35	32,790	31,107	24,126	14,298	1,416	65
36 – 40	33,292	22,846	23,531	20,574	3,999	356
41 – 45	30,042	19,527	22,986	23,058	6,580	1,205
46 – 50	24,239	16,809	21,572	20,619	7,268	1,925
51 – 55	21,029	14,973	19,163	17,680	7,154	2,336
56 – 60	17,172	10,231	10,823	10,357	3,805	1,464
61 – 65	10,658	3,961	2,940	3,010	1,011	363
66 – 70	3,593	735	339	546	196	76
71 +	982	108	51	76	32	15

44. It is evident from the table that the lower earners are typically younger members whereas the higher earners are typically older members. As the lowest contribution tier will not be changed and a larger proportion of younger members fall into this tier it may appear that those in the remaining five tiers (who are typically older members) are more negatively affected by this change.

45. No change is proposed to the first tier because one of the key policy objectives of the structure is to protect lower paid members and to reduce the number of opt outs. Therefore, although a larger proportion of younger members will fall into the first tier, the Department believes that any difference in treatment is justifiable. The Department also notes that younger members may move into higher paid employment throughout the course of their career and would at that point move into the higher tiers.

Sex

46. The graph and table below break down the number of male and female active members in each contribution tier.



	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Tier 6
Male	51,003	41,514	42,336	43,431	13,240	4,179
Female	183,851	125,538	94,971	69,993	18,327	3,613

47. While the membership is predominantly female, a higher proportion of male members are in the higher tiers. However, as the proposed changes to the tier structure applies to all members regardless of sex, the Department does not believe the policy discriminates based on sex and any difference is justifiable as a legitimate policy aim.

48. A further consideration in relation to this protected characteristic is working pattern and how the change to the contribution rate will impact members who work full time/part time or both.

49. The table below outlines the number of male and female members in each contribution tier broken down into full time and part time working patterns. Some members have both a full time and a part time contract.

	Full time		**Part Time**		**Full time/Part Time**	
	Male	**Female**	**Male**	**Female**	**Male**	**Female**
Tier 1	24,406	62,492	26,507	120,947	100	412
Tier 2	35,667	85,332	5,784	39,732	63	273
Tier 3	40,439	84,670	1,862	10,177	35	124
Tier 4	42,425	65,791	984	4,077	22	65
Tier 5	12,967	17,610	269	705	4	12
Tier 6	4,086	3,500	93	131	0	0

50. Whilst an individual's working pattern is not a protected characteristic for the purposes of the Public Sector Equality Duty, we have considered the relationship between working pattern, sex and salary because the contribution structure impacts differently between part time and full-time members.

51. It is evident from the table above that more female members work part time, particularly female members in the lower salary bands. However, given that the contribution rate is based on members' actual earnings rather than their FTE (full time equivalent), the Department does not believe part time members, predominantly female members, would be unfairly disadvantaged by the changes outlined in this consultation.

Ethnicity

52. Available data on TPS membership only covers members' age and sex, as the scheme administrator only collects data that is necessary for the administration of the scheme.

53. The data in the table below has been taken from the School Workforce Census 2023 (published in 2024), which is regarded as a reasonable proxy for the characteristics of active members of the TPS, given the high percentage of those

eligible to be members. However, as the census data does not break down these groups into age or salary bands it is not possible to conclude if any groups would be impacted more than others by the change to the member contribution tiers.

54. However, as the member contribution tier change would apply to all active members regardless of the above characteristics, the Department does not believe there are negative impacts that would emerge based on ethnicity following a change to the tiers that was not related to a justifiable policy aim.

Ethnicity	Number	%
White	410,932	89.2%
Black or Black British	12,276	2.7%
Asian or Asian British	25,361	5.5%
Any other Mixed background	8,055	1.7%
Any other ethnic group	4,134	0.9%
Total	460,758	100%

Marriage and Civil Partnership, Disability, Religion and Belief, Gender Reassignment and Sexual Orientation

55. There is no available data on these groups in relation to the TPS membership. However, the Department has considered the potential impact of the proposals and does not foresee any unjustified differential impacts that the proposed amendments would cause for members by reference to these protected characteristics.

Conclusion

56. The Department has considered the impact of the proposals in the context of this duty, and we invite respondents to help refine this initial analysis by contributing further perspectives or identifying where there might be other equality impacts to consider.

Respondents are asked to consider whether;

- there are any equality impacts as a result of any of the proposed amendments?
- that the Department has not identified and needs to take account of?
- there are any other comments?

Response from Community:

As we have mentioned earlier in this response, Community believe that there is just cause to consider the impact on two particular groups covered under the Equality Act.

We have concerns that the recent regular changes to the Scheme and the increases in individual and employer contributions are increasingly making the Scheme unviable, especially for Early Career Teachers and part timers.

We acknowledge that these proposals do not change the tier 1 contribution rates, and that this may protect the most recently qualified teachers and those working part-time however, those in tier 2 will see a significant increase in deductions on top of increased repayment of student loans and other cost-of-living increases. To be clear, a teacher could be making tier 2 contributions just a few years after qualifying whilst also being required to cover high levels of rent, utilities and excessive student loan repayments.

We fear this will have an adverse impact on young teachers causing them to question whether they can afford to contribute to the TPS at all and therefore affecting their long-term financial stability, exactly the opposite of what the government legislation to require every employee to be part of a workplace pension was designed to do.

A further potential result could be people choosing to leave teaching altogether as the bring home salary does not adequately cover the cost of living and they can achieve a better standard of living from working in the private sector.

A significant proportion of the teacher workforce is female, and recent analysis shows that the vast majority of female teachers request part-time working following maternity leave. Whilst this part-time working is likely to reduce salary such that pension contributions will also reduce, the changes to contribution rates could prove a disincentive should they be offered additional temporary hours or an increase to their working time which would move them into the next tier of contributions.

Next Steps

57. After the consultation has closed on 23 January 2025, responses will be fully considered before changes to TPS regulations are finalised, expected to be in force by Spring 2025. A consultation response document will be published at the same time.