

13 October 2025

Dear Committee for Communities,

On behalf of the Northern Ireland Committee of the Irish Congress of Trade Unions (NIC-ICTU) and affiliated trade unions, we welcome the opportunity to provide comments on the policy intentions of the measures requiring Legislative Consent under *The Pensions Schemes Bill*.

Trade unions represent the collective voice of workers and pension scheme members across Northern Ireland. We are committed to ensuring that all changes to pensions legislation maintain fairness, transparency, and the long-term protection of workers' retirement security.

We offer the following comments on each of the proposed measures:

1. Terminal Illness Provision

We support the proposed change extending the definition of terminal illness from six months to twelve months. This is a compassionate and practical reform that will provide greater flexibility and financial support to workers and their families during extremely difficult circumstances. It aligns with broader efforts to improve access to lump-sum benefits for those with terminal conditions. However, we would stress the importance of clear communication to affected scheme members and their representatives to ensure consistency and fairness in implementation across all relevant schemes.

2. Pension Ombudsman – Enforcement of Decisions

Trade unions welcome the proposal to reaffirm the Pensions Ombudsman (TPO) as a competent court for enforcement purposes. This measure should simplify the process, reduce unnecessary legal costs, and improve access to justice for scheme members.

We would encourage the DfC ensures that adequate resources and administrative support are made available to the Ombudsman to manage any increase in caseload resulting from these changes.

3. Retrospective Actuarial Confirmation of Benefit Changes (Virgin Media Case)

We note the complexity of this measure and its potential implications for scheme members. While we understand the intent to provide legal certainty for schemes affected by the *Virgin Media v NTL* judgment, we urge caution to ensure that retrospective validation does not disadvantage members or diminish accrued benefits.

Any retrospective changes must include robust safeguards and full transparency, ensuring that members are not unfairly impacted by administrative or actuarial omissions beyond their control.

4. Pensions Dashboard

Trade unions strongly support the inclusion of the Pension Protection Fund (PPF) and Financial Assistance Scheme (FAS) data on the government-backed pensions dashboard. This will enhance visibility and understanding for members and improve engagement with retirement planning. We would, however, emphasise the need for strict data protection and security standards, as well as clear public guidance to ensure that information displayed is accurate and comprehensible to all members, including those less familiar with digital tools.

5. Contractual Override

This proposal raises some concern. While we acknowledge the intention to facilitate consolidation and improve outcomes for members, enabling providers to vary contractual terms without individual consent could create risks around member rights and transparency.

We would urge that any contractual override powers be tightly constrained, with clear safeguards, consultation requirements, and independent oversight to ensure that members' interests are genuinely protected. Trade unions believe that collective consultation mechanisms will play an important role in providing accountability and assurance.

Conclusion

Overall, trade unions are supportive of measures that enhance fairness, efficiency, and member protection within pension schemes. However, we stress that these reforms must be implemented with full regard to workers' rights, consultation, and the principle of no detriment to scheme members.

We are grateful for, but must decline, the opportunity to provide **oral evidence** to the Committee on 16 October to further discuss these issues and their implications for workers in Northern Ireland. We feel that the issues we can comment upon are covered in this written response.

Kind regards,

Jim Quinn (TU-Side co-chair of the DoF CCWG)

John O'Farrell (NIC-ICTU secretariat)

On behalf of the **Northern Ireland Committee of the Irish Congress of Trade Unions (NIC-ICTU)**
45/47 Donegall St
Belfast, BT1 2FG

