Government Actuary's Department

Colette Heaney,
Head of Pensions Division,
NICS HR,
Department of Finance
By email only

6th Floor
10 South Colonnade
London
E14 4PU

Fiona.Dunsire@gad.gov.uk
gov.uk/gad

17 November 2026

Dear Colette,

The Public Service Pensions (Valuations and Employer Cost Cap) (Amendment No. 2) Directions (Northern Ireland) 2026

1. Thank you for your letter of 17 November 2026 explaining proposed amendments to the Directions and requesting my professional opinion on the draft Public Service Pensions (Valuations and Employer Cost Cap) (Amendment No. 2) Directions (Northern Ireland) 2026 (the "Amendment No. 2 Directions").

2. This request has been made in accordance with section 11(4) of the Public Service Pensions Act (Northern Ireland) 2014 (the "2014 Act"), which requires the Department of Finance ("DoF") to consult the Government Actuary before issuing or revising valuation directions under section 11(2).

3. Following the amendments that DoF made in The Public Service Pensions (Valuations and Employer Cost Cap) (Amendment) Directions (Northern Ireland) 2026, it was identified that a provision had been omitted in error. The omission related to the long-standing policy position which disapplies any requirement to produce employer contribution rate information as part of the Local Government Pension Scheme (Northern Ireland) [LGPS (NI)] valuation process under DoF's Directions.

4. The Amendment No. 2 Directions are therefore intended to correct the omission and restore the position that has applied since the introduction of the valuation Directions in 2014.

5. I understand you have taken legal advice to ensure the proposed amendments reflect the intended policy position and, on my part, I have considered these proposed amendments and have no reason to believe otherwise.

6. It is also my opinion that after these proposed amendments come into force, the Directions will continue to:

    a. deliver results for the 2024 valuations that largely meet the stated objectives, with some better met than others; and

    b. in the round, be technically complete and coherent.

7. The need for this change does highlight the complexity of the Directions and the importance of the review processes. I would be happy for my team to continue to provide the relevant support and quality assurance, including additionally ensuring existing Northern Ireland policy positions as identified in annex C of DoF's letter of 25 September 2023 are maintained, where appropriate, as the Directions are reviewed and amended in the future.

8. I note that no 2024 valuation results have been published yet in respect of LGPS (NI) and that no additional actions are required.

9. The previous comments in my letter of 30 June 2026 continue to apply.

Compliance and limitations

10. This letter is addressed to the Department of Finance and sets out my professional opinion on the draft Amendment No. 2 Directions. I understand that the Department of Finance may publish this letter. Other than the Department of Finance, no person or third party is entitled to place any reliance on the contents of this report. GAD has no liability to any person or third party for any action taken or for any failure to act, either in whole or in part, on the basis of this report.

11. This letter has been prepared in accordance with the applicable Technical Actuarial Standards: TAS 100 and TAS 300 issued by the Financial Reporting Council (FRC). The FRC sets technical standards for actuarial work in the UK.

Yours sincerely



Fiona Dunsire
Government Actuary