

Regulatory intervention report

issued under section 89 of the Pensions Act 2004
in relation to the British Steel Pension Scheme

February 2018

The Pensions
Regulator

Summary

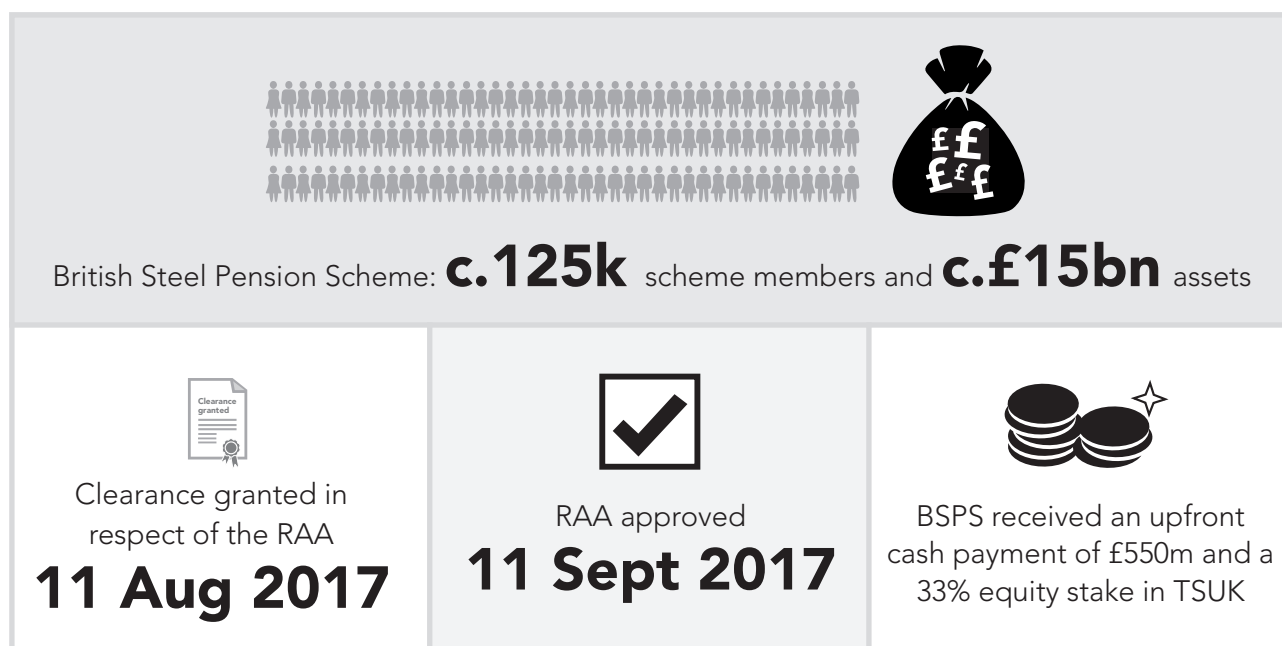
The Pensions Regulator (TPR) has approved and granted clearance for a regulated apportionment arrangement (RAA)¹ in relation to the British Steel Pension Scheme (BSPS). This report sets out the background to our decision-making process, how we assessed the application, and the outcome we reached.

A proposal for a successor scheme was made at the same time as the RAA application. The aim of this new scheme is to give most members of the BSPS the possibility of receiving more money than they would have received from the Pension Protection Fund (PPF) – however, the extent to which it will provide higher benefits than the PPF will depend on each member's individual circumstances. For example, for those who are yet to draw their pensions, the PPF may provide higher benefits depending on the decisions they make about the timing of drawing their pension and the value of the cash lump sum they choose to take.

The creation of a new scheme is not one of the criteria that must be met for us to approve an RAA. However, in this case we asked for details of the proposed scheme to be included in the application because we have regulatory responsibility for ongoing schemes, and wanted to ensure that the proposed governance and funding level for the new scheme were appropriate. Because of this, we have included a section in this report that covers the main features of the proposed new scheme and our involvement with it.

¹ Further information about RAAs can be found at <http://www.thepensionsregulator.gov.uk/docs/regulated-apportionment-arrangements-statement-august-2010.pdf>

Illustrated summary



Background

The origins of the BPS go back to the nationalisation of the British steel industry in 1967. The current BPS was set up in 1990 after the privatisation of British Steel in 1988. Between 1995 and 2009 a number of company schemes were merged into the BPS as part of a long term pension review. It is one of the largest defined benefit (DB) pension schemes in the country, with approximately 125,000 members and £15bn of assets². In March 2017 the BPS was closed to future accrual, meaning that no new members could join and existing members could no longer build up their benefits. At this point the ongoing funding deficit was approximately £2.5 billion and the estimated buyout deficit (the amount it would cost for an insurer to pay the pension benefits) was £7 billion. The PPF deficit was calculated at £2.9bn in September 2016.

Tata Steel UK Limited (TSUK) is a UK manufacturer of steel whose ultimate parent company is Tata Steel Limited (TSL), based in India. It is the main employer of the BPS and, together with seven of its subsidiary companies, sponsored the BPS (which is why we focused on it when considering the RAA and clearance application). The company was acquired in 2007 when TSL bought Corus Group Plc, and the global financial crisis of the following year and subsequent fall in steel prices had a significant impact on the fortunes of TSUK. Ever since, it has relied on TSL and other companies within the TSL Corporate Group (the Group) for financial support to meet its obligations, including to the BPS.

The BPS held a minority share in security over various assets of the Group, including the shares in Tata Steel Netherland BV (TSN) which the trustee had negotiated as contingent support (ie an asset whose value could be realised at some point in the future if specific events occurred). The security rights held by the trustee were shared with bank lenders to Tata Steel's European Group.

²
As at 30 June 2017.

The position of TSUK

TSUK proposed a turnaround plan in a bid to improve its fortunes and reduce its reliance on the Group. However, in early 2016, TSL decided that it was no longer prepared to continue funding TSUK, or consider funding a turnaround plan, without a restructuring of the BPS. Despite supporting BPS since the acquisition in 2007, TSL had no legal obligation to fund the scheme as it was not, and had never been, the scheme's statutory employer.

Before serious consideration was given to an RAA, the Group explored a number of other options, including:

1. Approaching the Department for Work and Pensions (DWP) to amend legislation.³ This would allow TSUK (with trustee support) to exercise a power contained in the BPS rules to reduce pension increases to statutory minimum levels. The DWP launched a public consultation⁴ on the options for the BPS in summer 2016, including this potential change to legislation. This decision to consult was taken because of the implications it would have for BPS member benefits as well as, potentially, for members of other DB pension schemes. Furthermore, changing existing legislation at the request of an individual scheme would set a precedent for the wider DB pensions landscape. This option was not pursued.
2. An attempt by TSL to sell TSUK. This process began in April 2016 and was suspended in July 2016 for two main reasons: (a) prospective buyers were not willing to take on the BPS and made offers conditional on it being detached from TSUK and (b) all offers under the sale process would have been conditional on TSL providing significant financial input.
3. A possible joint venture with the German steel manufacturer thyssenkrupp, TSN and TSUK. However, thyssenkrupp was unwilling to include TSUK in any joint venture without TSL reducing the risk that the BPS posed to the UK business.

An insolvent restructuring, such as pre-pack administration (where a company appoints administrators to immediately complete a pre-negotiated sale of its assets) was also considered. However, TSL did not accept this because it would have affected the sustainability of the UK business, separated the scheme from the company in a way that would have triggered the TSN security, and the BPS would have gone into the PPF with no possibility of offering members an alternative. Not only would this have been unattractive to TSL, but it would have prompted us to investigate the circumstances leading up to the administration and whether it was appropriate to use our anti-avoidance powers.

³ Section 67 of the Pensions Act 1995.

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/526731/british-steel-pension-scheme-consultation.pdf.

When it became clear that the sale process for TSUK was not succeeding the Group, supported by the trustee, concluded that the only way to avoid insolvency would be to use an RAA. This, together with an optional member transfer exercise to a successor scheme sponsored by TSUK, appeared, on balance, to be the preferable option in the circumstances.

As we had been in regular contact with the scheme since its 2011 actuarial valuation, we were already informed about the issues it was facing. When, in early 2016, TSL indicated its intention to withdraw the support it had been giving to TSUK, we began more in-depth discussions with the trustee and Group, focusing on a possible restructure of the scheme. We made it clear, however, that we would require a full analysis of the various alternative options from all parties before accepting that an RAA was the only alternative to insolvency.

The RAA

TSUK approached us and the PPF in mid 2016 to propose an RAA. We held a series of meetings with the PPF, the BSPS trustee, and representatives from TSUK and the Group to understand how they reached the view that TSUK's insolvency was inevitable without an RAA, and to assess the mitigation package being offered.

The inevitability of insolvency is our 'gateway principle' and we expect RAA applicants to present a compelling case, demonstrating fully that this test is satisfied. Moreover, as was done in this case, we expect trustees to robustly challenge their sponsor's assertions as to the inevitability of insolvency and obtain independent advice where appropriate.

We scrutinised the advice the trustee had received, along with key financial information provided by TSUK, and undertook our own site visits with management in Port Talbot. We also decided to obtain our own independent advice on the inevitability of insolvency of TSUK. This was not due to any concerns we had about the trustee's approach, but rather due to the size and complexity of the deal being proposed.

In the case of this RAA, negotiations (which included the PPF throughout) continued for several months after we were satisfied that the inevitability of insolvency had been sufficiently demonstrated. These negotiations focused primarily on the mitigation package, as we did not consider that the early offers would provide the BSPS with a materially better outcome than would have been achieved from insolvency.

In particular, the Group challenged us, the PPF and the trustee on the value that should be attributed to the TSN security charge based on what the TSN shares might be worth in insolvency proceedings. In support of its claim, the trustee obtained independent advice to assess how much the BPS would be likely to receive from TSUK's insolvency. We considered this advice, again with the assistance of independent experts, and came to a similar view as the trustee.

The Group's early offers included a proposal where the mitigation payments would be deferred over an extended period of time. We considered this to be unacceptable and maintained our usual stance that the cash mitigation should be provided upfront. The Group eventually offered an upfront payment of £550 million to the trustee, along with a 33% equity stake in TSUK. As one of the PPF's published principles, the provision of a 33% equity stake was a specific point of focus for the organisation. The PPF took part in several rounds of negotiations in order to agree the commercial terms of this element of the package. Both this equity stake and the £550 million will be divided between the PPF and trustee, depending on the eventual uptake for the successor scheme. TSL also paid the trustee's and PPF's costs.

The Group agreed to continue to financially support TSUK as negotiations progressed, so long as it did not become apparent that an RAA would be unachievable. We did not consider that this pre-RAA support meant that insolvency was not inevitable. This was because, if it became clear that an RAA was not possible, the support would be withdrawn and therefore trigger insolvency.

As with all RAAs, we worked closely with the PPF, as it has its own criteria which must be satisfied before confirming it will not object.

How the RAA application was assessed

RAA test	How it was met
Whether insolvency of the employer would be inevitable within the next twelve months or whether other solutions would prevent this	<p>We and the trustee separately sought independent financial advice, which confirmed that insolvency of TSUK was inevitable within 12 months without the support from the Group.</p> <p>The TSL board passed a resolution and subsequently made a market announcement to the stock exchanges where TSL is listed, stating that support for TSUK would be withdrawn if the RAA was not achieved. This would have triggered the insolvency of TSUK.</p>
Whether the scheme might receive more from an insolvency	<p>Cash mitigation of £550m, paid upfront and in full, was significantly more than the estimated return to the BSPS on the insolvency of TSUK. This included recognising the value of the TSN security. Despite the Group disputing the value of this charge in the early stages of the negotiations, both we and the trustee maintained the view that the security and its release needed to be mitigated appropriately.</p> <p>No value was attributed to the ongoing sponsorship of the proposed new scheme.</p>
The outcome of the proposal for other creditors	<p>There were no other directly comparable creditors involved. We concluded that the BSPS was being treated equitably when compared to other creditors.</p> <p>A significant proportion of TSUK's working capital requirement was funded by another entity undertaking financial activities in the Group. In support of the TSUK business, post restructure, the board of TSL has provisionally agreed to replace an element of this working capital support (up to around £500 million) with equity during the period to the 2020-2021 financial year. This will not dilute the 33% equity stake provided as part of the mitigation for the RAA.</p> <p>External bank lenders benefited from stronger security than the trustee and recourse to other companies within the Group. Unlike the trustee, they had enforcement rights, meaning the existing debt could not be written off as part of the transaction. Under an inter-creditor agreement senior lenders also benefitted from materially greater enforcement rights in comparison to the trustee – with security proceeds shared 67/33 in favour of the lenders and a cap on trustee value of £500m until all lenders were repaid.</p> <p>The majority of TSUK's supply purchases were made through a subsidiary of the Group which accounted for the vast majority of TSUK trade creditors. As part of the business turnaround plan, TSUK intends to replace a significant part of the support currently outstanding from such arrangements with equity by 2020.</p> <p>It is also worth noting that suppliers were asked to agree to material worsening of their payment terms over an extended period.</p>

How the RAA application was assessed continued...

<p>Whether a better outcome might be obtained for the scheme through other means (eg through the use of our powers)</p>	<p>We concluded it would not be reasonable to use our anti-avoidance powers (imposing a contribution notice or financial support direction) against any member of the Group. Most notably, the Group had no legal obligation to fund the BPS and had provided very significant support to TSUK since acquiring it.</p>
<p>The circumstances of the rest of the employer Group</p>	<p>The Group had provided significant financial support to TSUK and the BPS during a period of prolonged loss-making, and received no benefit in return. A significant proportion of TSUK working capital was provided by a Group financing company and a large part of this existing borrowing will be replaced by equity by 2020-2021.</p>

Outcome

On 11 August 2017, we gave clearance for the RAA and the release of the Group from its obligations to the trustee regarding the security arrangements granted to the BPS, including the interest over the TSN shares. We issued a determination to approve the RAA on the same day, along with the PPF issuing their non-object. This was then followed by formal approval on 11 September⁵. This effectively means that TSUK and the BPS' other participating employers have been released from all their legal obligations to the scheme.

The £550 million and 33% equity stake in TSUK have now been received by the BPS and will soon be divided once the uptake for the successor scheme is known. We believe that this represents the best possible financial outcome for the BPS in extremely difficult circumstances, as the only viable alternative was the insolvency of TSUK and the other sponsoring employers.

In our view, the total mitigation package is a fair deal for the BPS and is considerably more than would have been achieved had TSUK become insolvent. This is partly due to the trustee having negotiated the TSN security package back in 2007. Holding this security strengthened the trustee's negotiating position when it became apparent that TSUK was going to apply for an RAA. This highlights the importance of trustees being alert to opportunities for alternative, legally binding support for their scheme when efforts to secure cash have been exhausted⁶.

While we believe that the mitigation package achieved for the RAA is the most favourable outcome in the circumstances, we do remain acutely aware that any use of an RAA means that members will not receive the pensions they had been promised. We therefore cannot say that the use of an RAA is a 'good' outcome for members. However, it is a better outcome than would be achieved through the only other remaining alternative - the insolvency of the employer. While preserving jobs is not one of our statutory objectives, we are pleased that, as a consequence of this RAA, jobs were preserved in Port Talbot and elsewhere.

The Group also agreed to pay the costs of the independent advice we obtained when considering the inevitability of insolvency and the amount the BPS would receive on the insolvency of the employers. This offer was made and accepted only after we had concluded that our RAA criteria had been satisfied, and these funds were then passed to HM Treasury.

⁵ This allows for the 28 day referral period of our determination as required by legislation.

⁶ <http://www.thepensionsregulator.gov.uk/trustees/monitor-employer-covenant-improve-scheme-security.aspx#s19740>

Our approach to RAAs

We urge employers who are seeking an RAA and the trustees of potentially affected schemes to satisfy themselves that insolvency is the only alternative for the employer and scheme, as the likely effect of an RAA on members means they will not receive the benefits promised.

An RAA is not a mechanism for employers to renege on their funding obligations to their pension schemes. While we accept that there are significant deficits across a substantial part of the DB landscape, the vast majority of pension deficits remain affordable to their employers. Where there is material financial pressure, there are a number of flexibilities within the current funding regime which employers and trustees can work with, with the help of their advisers.

To ensure that the RAA framework is not abused, we will scrutinise all applications and assess these in accordance with our 2010 RAA statement, as well as looking at the wider circumstances of the employer, the scheme and other relevant associated parties. At the outset of any application, the applicants and the trustee must be satisfied that there are no other solvent solutions, and will be expected to show evidence that they have carried out robust due diligence to satisfy our RAA criteria. We will obtain our own independent advice where appropriate.

The successor scheme

In the majority of cases, a pension scheme will move into the PPF assessment period shortly after an RAA and subsequently transfer to the PPF or, if sufficiently well funded, will 'buy-out' benefits above the PPF level. In this case, although the BSPS was funded below the PPF level, the trustee and TSUK wanted to use BSPS' assets to provide members with an alternative to receiving PPF compensation. Therefore, a successor scheme (New BSPS) was proposed, in combination with the RAA proposal, to give members the option to either transfer their benefits before the BSPS enters the PPF or remain in the BSPS and transfer to the PPF.

The provision of a successor scheme is not a requirement for us to approve an RAA, and it is unusual in the context of an RAA for members to be given this option. In this case, eligible BSPS members are able to choose between staying in the BSPS and moving into the PPF, or switching to the New BSPS. There are various differences between the benefits provided in the New BSPS and the PPF which will influence a member's choice, depending on their situation.

This position is most complex for those who have not yet started drawing their pensions –for example, if they opt for the PPF they will need to weigh up a reduction in their starting pension against more generous early retirement and cash lump sum options. Which option is more financially beneficial will depend on the member’s personal outlook and their retirement choice.

The New BPS proposal

Although TPR is not responsible for the authorisation of new pension schemes, we do have ongoing responsibility for their regulation. Because of this, we need to make sure from the start that any new scheme is properly governed and administered, with an acceptable level of risk to members’ benefits and the PPF.

The New BPS will be a closed DB pension scheme in which members cannot build up future benefits. It is sponsored by TSUK and offers members the same benefits as they had in the BPS with the exception of future annual increases (relating to both deferred pensions and pensions in payment). Future increases to pensions in payment will be those required by legislation, and future revaluation of deferred pensions will be linked to the Consumer Price Index instead of the Retail Price Index. Depending on the level of inflation, this may have a significant impact on the value of pensions over time. However, the annual increases (for both deferred pensions and those in payment) will be the same as, or for some BPS members, higher than those provided in the PPF.

The New BPS proposal was the product of negotiation and agreement between the BPS trustee (on behalf of the members), TSUK and the Group. The aim was to strike a reasonable balance between the interests of the stakeholders when compared to all members receiving PPF compensation – the only alternative following an RAA. The balance between members’ interests and the sustainability of the New BPS was a major consideration for these stakeholders and is the reason for setting the qualifying criteria and potential discretionary benefit awards.

The BSPS trustee and TSUK chose to prioritise the provision of the same starting pension in the New BSPS as members would have received in the old scheme. This was because they recognised that members would not consider the New BSPS as an attractive alternative to the PPF unless this was protected. They also concluded that providing future annual increases (to pensions in payment) at the minimum required by law was as far as they could go if the New BSPS was to be sustainable, based on the level of the scheme assets (including the £550 million cash payment as part of the RAA to be split with the PPF and trustee).

If the BSPS trustee had pursued increases beyond this level, we understand that a proposal for a successor scheme may not have been agreed by TSUK as it was under no obligation to sponsor one.

Members who have accrued the majority of their benefits before 6 April 1997 will generally be most affected as they will receive no future annual increases to these benefits while in payment⁷. In recognition of the impact on these members, the BSPS trustee and TSUK agreed that the New BSPS will prioritise the award of discretionary pension increases to members with pre-6 April 1997 benefits.

The circumstances in which these increases might be awarded are:

1. When the shares the New BSPS holds in TSUK are sold, or dividends are received from those shares which are enough to pay extra benefits. In these circumstances, only benefits built up before 6 April 1997 will be considered for an increase.
2. If the funding level on a buyout basis reaches at least 103%. This is the measure of the cost of buying annuity policies for all members with an insurer. In these circumstances, all members could be considered for an increase.
3. If the outcome of the 31 March 2021 actuarial valuation is better than expected, and no payment has been made under 2) above. In these circumstances, only pensioners with some pre 6 April 1997 benefits would be considered for an increase.

7

There is no statutory requirement to provide future annual increases to pre-6 April 1997 pension in excess of the post 6 April 1988 Guaranteed Minimum Pension while in payment. The PPF compensation will not provide for future annual increases to pre-6 April 1997 pension. Therefore irrespective of whether members choose the New BSPS or move into the PPF, they will receive lower increases in payment than provided through BSPS.

Governance arrangements for the New BPS

The New BPS governance arrangements and trustee board composition have also been agreed between the BPS trustee and TSUK.

The New BPS trustee board will be run by six trustee directors. Two of these will be appointed by TSUK, two will be member-nominated trustee directors (MNTDs) and two will be professional independent trustee directors.

The New BPS will have to meet the statutory requirements for selecting MNTDs. This involves giving members of the New BPS the opportunity to nominate and select their representatives on the trustee board.

New BPS qualifying criteria

A transfer to the New BPS is not a foregone conclusion. Certain qualifying criteria, designed to safeguard members' benefits by ensuring TSUK is able to support the scheme over the longer-term, will need to be met. These include that:

- ▶ the assets that would transfer from the BPS to the New BPS should be enough to manage the risks of paying benefits and expenses and
- ▶ the assets of the New BPS would be at least £2 billion.

Whether these criteria will be met will not be known until March 2018, when members will have decided whether to transfer to the New BPS or receive PPF compensation. It may also depend on any large or unmatched changes in the value of the current scheme's investments.

TSUK as scheme sponsor

TSUK is currently carrying out its turnaround plan with a view to becoming consistently profitable and financially self-sufficient. As part of the RAA settlement, the BSPS holds a 33% stake in TSUK which will transfer to the New BSPS and the PPF, depending on the eventual proportion of the scheme membership in each. This means that the New BSPS could benefit directly from future improvements in the financial position of TSUK.

TSUK had no obligation to sponsor a successor scheme following the RAA, but volunteered to be the sponsoring employer to the New BSPS. As a result, they will have to meet the obligations of a statutory employer as set out under pension legislation which, amongst other things, means that TSUK will have a legal obligation to fund any future deficit.

How we approached the New BSPS proposal

As the New BSPS proposal was made at the same time as the RAA application, it was thoroughly considered before we granted our approval of the RAA. However, it was not a determining factor in that decision, which focused on ensuring that our published RAA criteria were satisfied.

Given our objectives to protect members' benefits and reduce the risk of situations arising which may lead to compensation being payable from the PPF, our primary focus was to ensure that the proposed benefits under the New BSPS would be sustainable beyond the short-term and that the New BSPS would have an appropriate governance structure in place to effectively manage the risks of the scheme. This meant that most of the details concerning the new scheme were agreed between TSUK and the BSPS trustee before we approved the RAA. This agreement included its benefit structure, the composition and operation of its trustee board, the powers accorded to each of TSUK and the trustee under its trust deed and rules and, as set out above, the qualifying criteria.

In considering the sustainability of the New BSPS, we scrutinised the advice both the trustee and TSUK had received and asked the trustee to undertake additional risk modelling exercises for our consideration.⁸ We also asked TSUK to demonstrate its ability and commitment to support the New BSPS should a deficit arise and contributions be required to fund it.

8

This advice included scenario analysis which considered a range of future investment and demographic stresses based on the characteristics of the scheme's proposed investment strategy and liability profile, as well as stochastic modelling techniques such as asset and liability modelling (ALM).

Again, in recognition of the potential size of the New BPS, we made the exceptional decision to obtain our own independent actuarial and investment advice. In undertaking our assessment we also considered the risks to the PPF and its levy payers, who would ultimately underpin the New BPS should TSUK face insolvency in the future.

It is important that members are involved, are given a choice, and are not transferred without their consent. Reducing the benefits they have already built up via a transfer to a new scheme is a step which trustees should approach with the utmost caution, even if members consent. We should be consulted before any such exercise begins and we will expect members to receive adequate information before being invited to make a decision.

In this case, we have been in close contact with the trustee about member communications, and have reviewed the documents the members have been given, along with materials that have been presented at a series of nationwide roadshows. We have also urged the trustee to talk to members about the importance of obtaining independent financial advice, and asked them to give out our pension scams leaflet when sending out other communications about their decision, as per our published guidance.⁹

Before transfers to the New BPS and the PPF, members who were more than one year from reaching their normal retirement age had the option to take a cash equivalent transfer value and transfer this to another occupational pension scheme or a personal pension scheme. Our view is that generally it is not in members' best interests to give up the certainty of income available from a DB scheme in favour of reliance on a defined contribution scheme. We are aware of significant concerns about the advice given to some members' considering this option by certain financial advisers and have worked with the FCA and The Pension Advisory Service to ensure that affected members were made aware of the appropriate sources of advice and guidance in order to help them consider their options.

Having completed our analysis we reached the view that if the qualifying criteria are met, the risks to the New BPS should be manageable, given the financial strength of TSUK. Because of this, we did not seek to change the proposal.

⁹
<http://www.thepensionsregulator.gov.uk/guidance/incentive-exercises.aspx>

Timeline of events

2007: Corus Group acquired by the Group

October 2007: Trustee obtains share in TSN security package

2008-2009: Global financial crisis and fall in global steel prices mean TSUK requires ongoing financial support from the Group

29 March 2016: The Group rejects TSUK's turnaround plan and asks its European subsidiary to consider other options, including the sale of TSUK

26 May 2016: The DWP launches a public consultation about BSPS options, one of which involves an RAA

8 July 2016: The Group announces the sale process for TSUK has been stopped

2016-2017: The trustee, TSUK and the wider Group discuss the RAA and its key commercial terms at a senior level with TPR and the PPF. The trustee and the Group also discuss the possibility of providing members with an alternative to PPF compensation. These discussions lead to TSUK agreeing, in principle, to sponsor a successor scheme after the RAA.

31 March 2017: The BSPS is closed to future accrual

16 May 2017: Key commercial terms of the RAA are agreed in principle between TSUK and the trustee, but subject to detailed documentation and formal approval by TPR and non-objection from the PPF

11 August 2017: TPR provides clearance for the RAA and release of the security and guarantees in favour of the BSPS, and makes a determination to approve the RAA. PPF issue their non-object.

11 September 2017: TPR provides confirmation of its approval of the RAA. RAA becomes effective and releases TSUK from their legal obligations to BSPS.

End December 2017: Eligible members able to do so have to make their choice between transferring to the New BSPS or receiving PPF compensation

28 March 2018: Electing members transfer to the New BSPS if the Qualifying Conditions have been met.

29 March 2018: BSPS expected to enter a PPF assessment period

The regulator's consideration and approach to individual cases is informed by the specific circumstances presented by a case, not all of which are referred to or set out in this summary report.

This summary report must be read in conjunction with the relevant legislation. It does not provide a definitive interpretation of the law. The exercise of the regulator's powers in any particular case will depend upon the relevant facts and the outcome set out in this report may not be appropriate in other cases. This statement should not be read as limiting the regulator's discretion in any particular case to take such action as is appropriate. Employers and other parties should, where appropriate, seek legal advice on the facts of their particular case.

Regulatory intervention report

British Steel Pension Plan

© The Pensions Regulator February 2018

You can reproduce the text in this publication as long as you quote The Pensions Regulator's name and title of the publication. Please contact us if you have any questions about this publication. This document aims to be fully compliant with WCAG 2.0 accessibility standards and we can produce it in Braille, large print or in audio format. We can also produce it in other languages.

**The Pensions
Regulator**