

23 December 2008

Kate Gerrard
The Pensions Regulator

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Dear Kate

Thank you for providing us with an opportunity to comment on the draft revised TKU code of practice and scope guidance.

The feedback we have had from NAPF members on the review indicates very strongly that the pensions community regards the proposed revisions as being helpful and appropriate.

Particular praise has been received relating to the new third set of scope guidance you have now included, dealing specifically with small and fully insured DC schemes.

We have also had generally positive comments about the new emphasis on those who deliver training being expected to provide certification that individuals have demonstrated the appropriate level of understanding. That is seen as an excellent way to provide confidence to scheme sponsors that the knowledge required to run a straightforward pension scheme has been assimilated and understood by those charged with the task, provided that the time taken up by measuring levels of understanding is not excessive.

And we have found general approval for the confirmation that trustees are not expected to be experts. NAPF's experience is that trustees appreciate that the TKU requirements are designed to enable them to understand, discuss and decide on the advice they receive.

One concern has been raised by a number of our smaller fund members where the main source for trustee training is the Regulator's trustee toolkit, which we understand will be updated to reflect the revised TKU 'syllabus'. The NAPF, as an organisation that provides trustee training, can, of course, offer some assistance. But will the Regulator be giving any guidance as to how trustees can best update their knowledge without retaking the trustee toolkit modules in their entirety?

Should there be any specific further points which the Regulator would like an opinion on after the consultation closes at the end of this month, please do let us know.

Yours Sincerely

Alan Chart
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