

AGREEMENT AND ACTIONS

**Communications Working Group
11am to 2pm – 23 October 2017
Rooms A and B – Layden House**

Present

Carol Haywood (Leicestershire Pension Fund)
Cheryl Platts (Buckinghamshire Pension Fund)
David Williams (Environment Agency)
Jenny Gregory (East Riding Pension Fund)
Jenny Wylie (Oxfordshire Pension Fund)
Karen Brooker (Kent Pension Fund)
Lorraine Bennett (LGPC Secretariat)
John Smith (Local Pensions Partnership)
Mandy Judd (Hampshire Pension Fund)
Martin Griffiths (Staffordshire Pension Fund)
Matt Allen (Cornwall Pension Fund)
Pamela Bruce (Lothian Pension Fund)
Rachel Howe - Chair (West Midlands Pension Fund)
Rebecca Clough (Shropshire Pension Fund) – dialled into the meeting
Steve Jones (Merseyside Pension Fund)
Stuart Duncombe (West Yorkshire Pension Fund)
Zoe Stannard (Wiltshire Pension Fund)

Apologies

Andy Brooks (Gwent (Torfaen) Pension Fund)
Ben Altoft (Avon Pension Fund)
Cory Blose (LGSS)
Diane Taylor (Tyne and Wear Pension Fund)
Guy Hayton (Merseyside Pension Fund)
Mathew James - Vice Chair (Dyfed Pension Fund)
Neil Lewins (Local Pensions Partnership)
Steve Makin (Avon Pension Fund)

1. Actions and agreements from last meeting held on 13 February 2017

Minutes from the last meeting were agreed. Action points were reviewed :-
Action 1 – the response from POGs to the usefulness of materials produced by the CWG was discussed. Some members reported positive feedback others reported that the feedback was muted.

Action 2 – see agenda item 3

Action 3

- LTA factsheet to include scheme pays. Lorraine Bennett (LB) confirmed that the factsheet already mentions this but doesn't use the term scheme pays as this is more of an administrator term. Group agreed this was fine. No action necessary.
- Accessibility on the member website will be developed in line with best practice in the future – it is not priority at the present time as the LGA have had no feedback that users are having problems using the site.

- A notice will be placed on the mobile version of the member website to state it does not have accessibility options and members will need to switch to the desktop site to use the accessibility options.

Action 4 and 5 – both complete

Action 6 – see agenda item 5

Action 7 – complete

Action 8 – production of a FAQ on what happens to an AVC when a member/leaves/re-joins or transfers their LGPS benefits. As the amendment regulations are not likely to be laid anytime soon it was agreed to proceed with this now on the current basis. Rachel Howe (RH) will nominate some staff from WMPF to work on the document with Stuart Duncombe (SD) from WYPF.

Action 9-13 – complete

Action 14 – are the LGA going to issue and GDPR guidance? SPB leaflet issued in July, legal opinion currently being obtained from SPB on a range of specific issues.

Action 1: update the mobile member website about accessibility

Action 2: SD and RH to take forward action 8 above to produce a FAQ on AVC options when a member leaves, re-joins the scheme or transfers benefits out of the scheme.

2. GDPR

RH talked about the work the GDPR group has undertaken so far. The sub group received training from Dilys Jones initially and then met to discuss the production of key documents such as the Privacy Impact Assessment (PIA) template, Fair Processing Notice, Incident Report Form and the Data Protection Policy. RH has drafted these documents but had little feedback from the group as yet. It was agreed that David Williams (DW), Martin Griffiths (MG), SD and Jenny Gregory (JG) would ask their Data Protection Officers to review the documents and report back.

LB mentioned that Guy Hayton from Merseyside has previously commented on the documents and that she would also review the document with her colleagues at the LGA.

LB reported that the LGA has asked Squire Patton Boggs (SPB) 8 specific questions regarding GDPR around consent, providing information to in house AVC providers, keeping personal data where the fund no longer has a liability for a member, the right of erasure, the right to restrict processing and so on. The LGA has received a response from SPB and is in the process of clarifying a few points, it is expected that they will be in a position to be able to disseminate the information in the next week or so.

Action 3: DW, JG, SD and MG to ask their DPOs to review the materials produced by the GDPR sub-group. LB and colleagues to also review.

Please feedback comments by 30/11/2017.

3. Member website

Statistics

LB confirmed that the number of hits has more than doubled since the last CWG meeting:

	February 2017	September 2017	% increase
Users	15,350	33,821	120%
Sessions	20,460	45,424	122%

Page views	115,618	243,034	110%
Bounce rate	29.77%	32.33%	2.56%

Closure of previous sites

LB informed the group that the www.lgps2014.org closed in April 2017. There will be redirects on every page to the current member website until March 2018 when the redirects will disappear.

www.lgps.org.uk will be closing after the Scottish version of the member website has been published – aiming for March 2018.

Videos

The group discussed the videos that were on the old 2014 site again, namely:

- How is my pension worked out?
- When can I take my pension?
- Paying into the LGPS before 1 April 2014?

The videos only received 6,500 views in the year before they were taken down (6 or 7 views a day) and LGA have not received any queries asking where they have gone since April – given this, the group were asked whether they thought it was still worth re-instating them.

The general consensus was that videos are good way to communicate complex subjects such as pensions and are definitely a communication tool we should look to introduce more of in the future. The group suggested new videos rather than revamping the old ones but LB confirmed that she would need to look at the costs involved.

SD mentioned that they were undertaking a pilot with Bradford University where media students are creating a video called “what is your ABS?” for WYPF for a low cost. SD agreed to feedback the results in due course. This could be an avenue that we could look at developing in the future.

RH mentioned that at the PLSA conference last week Legal and General used a video to show a member their ABS visually which worked very well.

Action 4: SD to feedback how the video pilot goes

Action 5: LB to look at current videos and check if they need updating. If they do to cost whether amending the current videos or creating new ones would be more cost effective.

Action 6: Cheryl Platts (CP) asked that page 3 of the promotional leaflet be updated to talk about CARE benefits being adjusted in line with inflation rather than increasing – LB to action.

4. Annual Benefit Statements

The administration processes

The group discussed how the ABS experience has gone this year. The general consensus was it had gone quite well but most funds were still unable to get out all their ABS due to poor quality data or no data from employers. Academies and admitted bodies were cited as the problem employers particularly where there was high turnover of the admin/finance staff providing the pension data to funds.

A discussion also took place around monthly data collection and whether that had provided efficiencies – the response was mixed. Some funds said it has been very good but there was the issue of getting employers to sign off that they had reconciled the data at the end of year. Others said that monthly data collection did not save time it just spread the work over the year.

Member experience

The group discussed how very little member feedback is received in relation to the ABS exercise and the reasons for this. The consensus was that whilst the ABS template meets disclosure requirements this may not necessarily reflect what members want or need to know about their pension. It was agreed that the current layout should be reviewed and members' views should be sought. Providing different information to those over and above 55 years was also discussed and the possibility of creating a video to explain how to understand the ABS.

Action 7: RH to work with Shropshire and Staffordshire pension funds to obtain the views of members regarding the ABS and feedback to the group in due course.

5. AVCs and Freedom & Choice

Production of communication materials in relation to AVCs to meet the disclosure requirements in the Disclosure Regulations 2013

Since the last meeting the AVC sub-group has produced a document confirming the disclosure requirements and have clarified certain matters with Prudential.

The sub-group now need to agree how to take things forward. LB will be responsible for making the changes to the Freedom and Choice technical guide to which we would want to append any letters. For confirmation members of the sub-group are:

Rebecca Clough, Steve Makin, Carol Haywood, Andy Brooks, Jenny Wylie, Stuart Duncombe, David Williams and Lorraine Bennett. Members of the sub-group who were present agreed that they were happy to continue being so.

Action 8: LB to set up a conference call in the next couple of weeks for the sub-group to discuss next steps – scheduled for Monday 13th November.

6. Brewster

RH asked the group what they were doing regarding identifying any possible Brewster cases. Most funds were waiting to hear the result of the Elmes v Essex case which would set a precedent for cases in England and Wales. WMPF had started work on estimating how many cases they would be likely to have – the estimate was 112 (out of 300,000 members).

7. Communications Plan 2017/18

It was agreed that in addition to the standard agenda items (ABS, member website, taxation of pensions) the specific items would be:

- the video work (under the member website)
- AVCs and Freedom & Choice
- Member focus groups under ABS.

It was agreed that items for next year would include 50/50 scheme communication (following on from the SAB survey) and Pensions Scams. The proliferation of SCAVC schemes was discussed but the general

consensus was that this is an employer issue, however, it would be kept under review and added as a special item if necessary.

Action 9: LB to produce and publish the work plan for 2017/18

9. AOB

- PI factors – funds experienced delays with retirement quotes due to late PI factors and confirmation of the Treasury Order. It was agreed that it would be beneficial for the group to write to Government to ask for the factors be released earlier?
- Automatic enrolment – funds had dealt with Transitional Delay with no problems. There was a low rate of automatic enrolment due to the opt-out exception.
- GMP reconciliation – has anyone got a template letter to send to members where over/underpayments are identified as part of the GMP reconciliation process? No-one at the meeting had reached the stage of writing to members in the reconciliation process yet so LB said she would ask Mathew James (MJ) at Dyfed as the Welsh funds have made considerable process in the reconciliation exercise and are more likely to have template letters.
- Standardised employer communications – a discussion was held around the difficulties in engaging employers and providing standardised documentation. All funds agreed it was hard work and an ongoing process.

Action 10: RH to draft letter regarding earlier release of PI Order and Treasury Order.

Action 11: LB to check with MJ with regard to template letters. Post meeting update – letters received and forwarded to group with minutes on 9/11/2017

10. Next Meeting

- Tuesday January 30th at 18 Smith Square, Westminster, London, SW1P 3HZ.