

Communications Working Group

AGREEMENTS AND ACTIONS
Thursday 11 July 2019 11am to 2pm
Eaton-Cockell Room - 18 Smith Square

1. Apologies and introductions

Present

Alastair Johnston (Durham Pension Fund)
Andy Hemming (West Midlands Pension Fund)
Ashleigh Salter (Wiltshire Pension Fund)
Ben Altoft (Avon Pension Fund)
Cheryl Platts (Buckinghamshire Pension Fund)
David Williams (Environment Agency)
Gareth Hall (Gwent (Torfaen) Pension Fund)
Guy Hayton (Merseyside Pension Fund)
Jacinta Wilmot (Environment Agency)
Jenny Gregory (East Riding Pension Fund)
Jenny Wylie (Oxfordshire Pension Fund)
Judith Richards (LPP)
Karen Brooker (Kent Pension Fund)
Lorraine Bennett (LB) (LGPC Secretariat)
Mandy Judd (Hampshire Pension Fund)
Matthew Allen - vice-chair (Cornwall Pension Fund)
Rachel Abbey (RA) (LGPC Secretariat)
Rebecca Clough (Shropshire Pension Fund)
Sharon Grimshaw (LGSS)
Steve Makin (Avon Pension Fund)
Stuart Duncombe (West Yorkshire Pension Fund)

Dialled in

Andy Brooks (Gwent (Torfaen) Pension Fund)
Mathew James (Dyfed Pension Fund)

Apologies

Pamela Bruce (Lothian Pension Fund)
Martin Griffiths - chair (Staffordshire Pension Fund)

Video sub-group: Andy Hemming, Cheryl Platts, Becky Clough, Steve Jones
ABS sub-group: Andy Hemming, Cheryl Platts, Becky Clough, Martin Griffiths, Stuart Duncombe

The group introduced themselves for the benefit of new members.

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1. Actions and agreements from last meeting held 3 April 2019

Most actions are covered in agenda items to follow.

Action 1: LB confirmed that the online APC calculators have been updated and the code is available on the [Code for calculators](#) page of www.lgpsregs.org website.

Action 5 (from meeting held 15 January 2019): HR and Payroll guides have been updated and version 4.0 of each guide is available on the [Guides and sample documents](#) page of www.lgpsregs.org.

2. Member website

- **Statistics**

At the meeting held on 3 April 2019 it was agreed that website statistics would be reviewed by the group annually instead of quarterly. The areas of interest to the group were agreed and are shown below:

a) Pages with the most 'hits' in June 2019 (out of a total 305,227 views)

	Page	Link	% of total page views
1	Home page	www.lgpsmember.org/	10.46%
2	Contact your LGPS fund	www.lgpsmember.org/contactfund.php	6.77%
3	Already a member	www.lgpsmember.org/already-member.php	5.20%
4	Buy extra pension	www.lgpsmember.org/more/apc/extra.php	4.78%
5	When can you retire?	www.lgpsmember.org/tol/thinking-leaving-when.php	4.56%
6	Thinking of leaving or retiring	www.lgpsmember.org/thinking-leaving.php	4.52%
7	Index (home page)	www.lgpsmember.org/index.php	3.79%
8	Contributions calculator	www.lgpsmember.org/more/contscalculator.php	3.70%
9	How is your pension calculated?	www.lgpsmember.org/arm/already-member-how.php	3.63%
10	How much lump sum would you like to take?	www.lgpsmember.org/more/lump-sum-calculator.php	3.07%

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b) Acquisition – how people are reaching the member website. Based on ‘hits’ in the week from 28 June to 4 July 2019.

Channel	% of users
Organic search	60.6%
Referral	21.8%
Direct	17.6%
Social media	<1.0%

c) Device category. Based on ‘hits’ in the week from 28 June to 4 July 2019.

Device	% of users
Desktop	61.23%
Mobile	26.20%
Tablet	12.56%

LB noted that the mobile version of the member website is a condensed version, which does not replicate the desktop site in full.

- **Videos project update**

LB updated the group on progress since the last meeting:

- **Funding**

Funding was already in place to produce three videos and the LGPC Committee agreed to the use of reserves to fund two more.

The Scheme Advisory Board (SAB) will fund two further videos covering pension taxation.

- **Video production**

LB and the Videos sub-group met with representatives of Your Landscape, the chosen provider, to discuss options. Five 90 second videos will be produced which cover:

Title (provisional)	Draft summary of content
What is my pension?	Importance of saving for retirement, tax relief, employer contribution, security of a defined benefit scheme backed by law
How does my pension work?	How a CARE scheme works, build-up rate, index linked, what happens if you leave
How can I manage my pension?	Contribution rate, 50/50 option, paying more through AVC or APC
What are the benefits of my pension?	Retire any time 55 to 75, Ill health retirement, death cover

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What are my options when I take my pension?	NPA, option to take your pension early or late, types of retirement, option to exchange pension for lump sum
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The SAB funded videos covering annual and lifetime allowance will be longer – up to two minutes - due to the complexity of the subject and the expectation that the audience will have a personal interest in the topic.

The theme will be continuous throughout the videos and LGA will own the rights to any characters or images, so these can be used in other areas such as member websites, guides and factsheets.

- **Timing**

Production will be staggered, with a view to all videos being completed by the end of September 2019. The Annual Allowance video is planned to be completed before the deadline for issuing pension saving statements (5 October 2019)

Issues discussed and /or raised by the group:

- **Language**

The group discussed what should be produced for Welsh language speakers and decided that the videos should have voice-over and subtitles in both Welsh and English in order to satisfy the legal requirement to treat both languages equally. Gwynedd have offered to help with translation of the script.

- **Financial Advice**

Members are more frequently asking to be directed to advisers who are qualified to advise on the operation of the LGPS, particularly in relation to pension taxation. The group agreed that it was not possible to recommend individual advisers, but that the videos could be used to direct people to factsheets which include additional information about how to choose an adviser.

- **Hosting**

Some employers block access to sites such as Vimeo and YouTube and so a different platform for hosting the videos was recommended to maximise the number of members who can access them. Wistia has been used in previous video exercises and was suggested as an option for this project.

Next steps:

Your Landscape are in the process of producing mood boards and draft scripts. Once these are complete, the subgroup and LGPC will meet with Your Landscape to select a theme and finalise the scripts of the first videos.

• **Web content accessibility guidance update from group members**

As discussed at the last meeting, a change in legislation requires public sector websites to meet accessibility standards. One aim is to move away from pdfs, with drop downs directly on web pages to access content instead of attaching pdfs. It is possible to continue to use pdfs as long as they are compliant.

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It was noted that funds should be considering reading age of viewers, not just visual impairment. The Government recommends that web content on GOV.UK is written for a 9 year old reading age. The www.hemingwayapp.com/ can be used to check whether text is too complex.

Word also includes the option to include readability statistics. Select File, Options, Proofing and tick the box next to 'Show readability statistics'. The results are displayed after a spelling and grammar check is performed. (Note that you should add five to the Flesch-Kincaid Grade Level figure to find out the reading age).

Using the services of the Plain English campaign was recommended. They will check content of documents and websites and are reasonably priced. Crystal mark awarded for content that meets the required standard.

Civica have confirmed that their new member portal is compliant, although it was noted that it uses pdfs.

Action 1: Becky Clough to check compliance of member portal at Heywood user group later in the year.

3. GDPR

- **retention policies – review of documents**

LB sent a draft version of the template administering authority retention policy to a small number of representatives of the group for comment. A final version incorporating the changes recommended was shared with the whole group in advance of the meeting.

Administering authority retention policy

There was a positive response to this document and it was noted that it should guide software systems development, so that the process of identifying records that have reached the end of the retention period can be automated.

Action 2: Highlight the fact that the data should be retained for the **greater of** the periods in the list on page 4.

Action 3: LGPC to send a copy of the retention schedule to representatives of the actuarial firms for their view on whether any data (and if so what data) must be retained indefinitely for actuarial purposes.

A query was raised about what action should be taken once it has been identified that a record has been 'dormant' for the prescribed amount of time. Should the whole record be deleted? Or are there reasons to remove any personal identifiers and retain a non-personal information for actuarial purposes?

The group expressed the view that this document should be published in advance of the completion of the employer retention policy.

Employer retention policy

Funds have reported that they are frequently asked by employers how long they should keep data for following the introduction of GDPR in May 2018. This document has been prepared in response to this demand.

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LB raised concerns with Squire Patton Boggs (SPB) about the inclusion of a seven year retention period because an administering authority may require the employer to supply:

- details of working hours from any time,
- an old job description in relation to the possible ill health retirement of a deferred member or
- 13 years of salary history for a member whose pay has been reduced in the ten years prior to leaving.

LB has informed SPB about circumstances when more information than has been supplied in end of year returns may be required – such as for annual allowance calculations and in cases involving backdated payments. Historical data covering more than seven years may be required for major exercise such as GMP reconciliation and to implement the remedy that to be agreed in response to the McCloud judgment.

The group raised a number of other points.

Action 4: LB to consider the following and arrange for changes in the document, where appropriate:

- State clearly that providing of pay and HR data to the administering authority remains the responsibility of the scheme employer, even if those services are outsourced
- Highlight the need for the employer to share details of their retention policy with their payroll provider, and the need to retain access to historical pay information when payroll providers change
- Page 5, second bullet point – make this more specific, ‘...salary information relevant to LGPS regulations’
- Page 5, third bullet point – remove references to bank details
- Differentiate between HR and payroll data, and state that providing a job description in connection with an Ill health application is a HR responsibility
- Page 6 – should the personal data retention period be a field that cannot be altered?

Action 5: Members of the group to review updated version. Guy Hayton, Becky Clough, Jenny Gregory volunteered.

- **Template privacy notices**

SPB to review templates once retention schedules have been finalised.

Changes required in the introduction but there have been no significant developments and so we do not anticipate that any major changes to the main body of the document are needed.

4. Annual Benefit Statements (ABS)

- **agreement on data items to be included**

A draft version of the data to be included in an ABS for active members was shared with the group in advance of the meeting – specifying which items must be included and which are optional.

RA noted that there is no requirement to provide a projection of benefits and suggested that funds may wish to direct members to an online portal instead, which allows members to produce projections at any future retirement dates and based on a salary level input by the member. The consensus of the group, which is supported by member

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research previously undertaken, is that the provision of a projection in the ABS was valued by members and should continue, at least until sign-up rates for online access have increased.

One fund had included projections based on retirement at multiple dates, which received positive feedback from members.

The main points agreed were:

- to continue to provide a projection to NPA, but that these should be kept simple – no breakdown of CARE or final salary elements
- Figures at 31 March (payable at NPA) should reflect the amounts payable after any AA Scheme pays deduction or divorce debit
- Reduced figures to be provided at 31 March for members between 55 and NPA on that date

Action 6: RA to produce a final version of the data to share with the subgroup early in the week starting 15 July 2019, subgroup to recommend changes and agree a final list by 19 July 2019

Action 7: RA and subgroup to meet with software supplier to discuss list of data items

5. Pre-retirement booklet

The group produced a pre-retirement booklet some time ago, but it was not updated for the Scheme changes in 2014. Support for producing an up to date version has been expressed at regional groups.

The Chair asked for volunteers to work on a new version and the following people offered to join the sub-group: Jenny Wylie, Jacinta Wilmot, Andy Hemming, Karen Brooker, Gareth Hall, Mandy Judd and Steve Makin.

The importance of the use of plain English and accessibility was emphasised. The group will produce a Word version which funds can adapt and use as they wish, using their chosen method to ensure accessibility.

Action 8: Much of the content in older versions of the guide will still be relevant and Gareth Hall and Cheryl Platts agreed to share existing documents with the group as a starting point. The sub-group will make changes in the existing document and take a view on whether a single guide should be produced for active and deferred members, or whether separate guides would be more appropriate.

Timings

- Sub-group to work with regional communications group to produce first draft by the end of October 2019
- CWG to sign off final version by the end of November 2019

6. Regional communication groups

Becky Clough provided an update from the last regional group meeting where they discussed:

- Deferred and active newsletters produced
- Amendment regulations
- How to communicate the Additional pension factor change

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- Plain English workshops
- Provision of retirement planning workshops now Prudential have stopped offering this service
- How have funds increased engagement and encouraged sign-up to online pension portal?
- KPIs – how do funds communicate with employers, particularly about bad performance?

7. Communications workplan

LB confirmed that the work plan has been updated and can be found on the [Communications working group page](http://www.lgpsregs.org) of www.lgpsregs.org.

The work plan includes reference to Cost Cap and the McCloud judgment. LB confirmed that, following the Supreme Court's rejection of the Government's request to appeal the McCloud decision, the case will be referred to an Employment Tribunal for remedy. We understand that there is a backlog of cases and that no decision is expected in the next 12 months. Once that decision is reached there will be a significant communications exercise for administering authorities.

The workplan also includes investigating the production of employer online training modules - Ashleigh Salter mentioned that Wiltshire are in the process of launching their own version of employer training which includes a module on final pay. She agreed to share this with the group.

Action 9: Ashleigh to share Wiltshire's online training with the group.

8. AOB

Terms of reference

LB raised the issue of membership of the group, which has become more pressing as there is currently a waiting list for membership. The 'terms of reference' allow individuals to put themselves forward for membership. This principle has not been followed recently because members who cannot attend a meeting have been sending a substitute and members leaving the group have been replaced by a representative of the same authority. If these practices continue then there will never be permanent places for those on the waiting list.

The group discussed the issue and agreed that it was important for all regions to be represented on the group. Members of the group were encouraged to include updates at their POGs so that all administering authorities are aware of the work done by the group, and to allow those funds not represented a route to voice their views on communication issues and priorities.

Post-meeting update

The group did not reach agreement on how new members should be selected and so the LGPC, as facilitators of the group have decided the following:

- All those on the waiting list to be offered a permanent place in the group – increasing the number of current members to 23
- Members not able to attend a meeting may not send a substitute - this will help to keep the attendance at each meeting at the optimum level of 20

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- When a member leaves the group a new member will be selected by the LGPC who will take into account geographical representation and any individuals waiting to the join the group in making their decision.

McCloud

A query was raised concerning whether funds were planning any changes to their ABS in the light of the McCloud judgment. The consensus was to continue with the same general disclaimer, specifying that the benefits quoted are based on regulations currently in force and cannot be guaranteed. Any change will mean an improvement in member benefits, and will have retrospective effect. No member will be disadvantaged by taking a decision now without knowledge of the outcome of the McCloud case.

Communication and Plain English training

Cheryl Platts asked whether anyone was aware of specific LGPS communications training. No one was aware of any.

Late retirement guidance – communication

Sharon Grimshaw asked what approach funds were taking to communicate the change in late retirement increase factors. The consensus was that this did not constitute a material change and so there was no requirement to communicate the changes under disclosure legislation. No members would be worse off when the new factors come into effect and so complaints are unlikely.

The general agreement was to include a short reference to the change in the notes that accompany an active member's annual benefit statement, and signpost to where they can find more information.

Partial flexible retirement

Stuart Duncombe raised the issue of partial flexible retirement. There is a particular group of members for whom this would be beneficial, but this option is generally not promoted to scheme members. The fact that software systems cannot correctly process this type of case is likely to influence funds' reluctance to promote this option.

Action 10: Employer policy on flexible retirement should include whether partial retirement is permitted. LGPC to include an article reminding funds and employers about this in their next bulletin.

Action 11: Users to raise the issue with their software suppliers as their systems should be able to cope with any provision of the regulations.

9. Next Meetings

The group usually meets four times per year.

LB to arrange meetings in mid-October 2019, January and April 2020 on Tuesday, Wednesday or Thursday.

Post meeting update: Rooms booked for Tuesday 15 October 2019, Wednesday 29 January 2020, Wednesday 29 April 2020.