

Communications Working Group
AGREEMENTS AND ACTIONS
Tuesday 9 March 2021 10:30am- MS Teams meeting

1. Apologies and introductions

Present

Alastair Johnston (**AJo**) Durham Pension Fund
Amanda Jupp (**AJu**) Surrey Pension Fund
Andy Hemming (**AH**) West Midlands Pension Fund
Becky Clough (**BC**) Shropshire Pension Fund
Ben Altoft (**BA**) Avon Pension Fund
Jacinta Wilmot (**JW**) Environment Agency
Jayne Taylor (**JT**) Flintshire Pension Fund
Jenny Gregory (**JG**) East Riding Pension Fund
Karen Brooker (**KB**) Kent Pension Fund
Karen Thomas (**KT**) Gwent (Torfaen) Pension Fund
Lindsey Davison (**LD**) Tyne and Wear Pension Fund
Lorraine Bennett (**LB**) LGPC Secretariat
Mandy Judd (**MJ**) Hampshire Pension Fund
Martin Griffiths (**chair**) Staffordshire Pension Fund
Mathew James (**MJa**) Dyfed Pension Fund
Matthew Allen (**vice-chair**) Cornwall Pension Fund
Rachel Abbey (**RA**) LGPC Secretariat
Rebecca O'Shea (**RO**) Oxfordshire Pension Fund
Richard Clark (**RC**) NILGOSC
Sharon Grimshaw (**SG**) Northamptonshire Pension Fund
Stuart Duncombe (**SD**) West Yorkshire Pension Fund

Apologies

Guy Hayton (**GH**) Merseyside Pension Fund
Pamela Bruce (**PB**) Lothian Pension Fund
Kath Meacock (**KM**) Flintshire Pension Fund
Zena Kee (**ZK**) NILGOSC

2. Subgroups

Digital engagement subgroup: Jenny Gregory, Becky O'Shea, Kath Meacock.

Transfer video subgroup: Andy Hemming, Jacinta Wilmot, Sharon Grimshaw, Rebecca Clough, Leah Swane.

Letter templates subgroup: Stuart Duncombe, Sharon Grimshaw, Ben Altoft, Karen Thomas.

Employer ill health briefing note subgroup: Stuart Duncombe, Guy Hayton, Mandy Judd (or another rep from Hampshire), Martin Griffiths.

McCloud subgroup: Martin Griffiths, Matthew Allen, Kath Meacock, Lindsey Davison and Amanda Jupp.

Exit payment reform employer subgroup: Matthew Allen, Guy Hayton, Jenny Gregory, Stuart Duncombe and Rebecca Clough.

Exit payment reform member subgroup: Martin Griffiths, Amanda Judd, Rebeca O'Shea (or Jenny Wylie), Jacinta Wilmot and Steve Jones.

Member website subgroup: Rebecca Clough. Leah Swane, Rebecca O'Shea, Andy Hemming, Sharon Grimshaw, Karen Brooker.

3. Actions and agreements from last meeting held 1 December 2020

The action points from the last meeting have all either been completed or are covered in later agenda items.

JG will shortly be leaving East Riding to take up a post with Civica. This will be her last meeting. The Chair thanked JG for all her hard work as a member of this group.

4. COVID-19

The group discussed the impact of COVID-19 on pensions administration:

- Having a younger workforce may have an impact on the timing of a return to office-based working because younger people will be vaccinated later.

- Some councils are looking at downsizing premises and moving to work from home or a hybrid arrangement as the norm.
- Pensions teams used to offer a walk-in service. Working from home has increased the number of queries received by helpdesks. Funds are considering whether the pensions team needs a physical presence once restrictions are lifted.
- Training the administration team is a concern for many funds and has been raised by at least one pension board. West Midlands have developed in-house e-learning to combat the problem.
- Monitoring team performance is also a concern. Some have found telephony solutions which allow supervisor input and greater reporting capabilities.

Action 1: BC to share details of the telephony system introduced by Shropshire.

- The LGA survey on training revealed equal support for face to face and online training. The LGA will continue to offer online training alongside face to face training once the current restrictions are lifted. Anyone who is unable to get a place at one of our courses because they are full should contact elaine.english@local.gov.uk. We will endeavour to schedule additional courses to satisfy demand.
- The administering authority's Communications Policy should reflect the current working conditions. Many funds have announced changes to their working practices without updating the policy. This is a good opportunity to review and update the policy.

Action 2: LGA to include an article in a future bulletin alerting administering authorities to review and update their Communications Policy.

5. Member website

Transfer out video

LB thanked the subgroup for their contributions to this project. LB shared links to the latest version of the Transfer video before the meeting – captions are still to be added.

Post meeting update: the English and Welsh versions of the Transferring your pension video are now available on the [Videos – Pensions Made Simple](#) page of www.lgpsmember.org.

New member website and logos

The procurement process has recently completed and the contract to produce the new member websites was awarded to Landscape. The plan is to launch new member websites for England and Wales and Scotland in September. The project plan requires certain stages to be agreed within a couple of days and we recognise that the timings may slip, particularly when members of the group are on leave.

The project will also include the introduction of new logos. A decision may be needed from the group on whether the new website and logos should be launched together.

The group discussed the importance of Plain English on the website. LGA intends to set up their own account with the [Plain English Campaign](#) once the new websites are live.

Some funds' websites and guides include links to the member website. Those funds will need to start thinking about identifying and changing those links once we launch the new websites.

6. Digital engagement

The LGA received 47 responses to the recent digital engagement survey. 30% of administering authorities that responded do not yet offer an online portal.

Action 3: JG to review the survey responses and prepare a draft version of a guide before she leaves her current post.

Action 4: The Chair asked for volunteers to join the Digital Engagement subgroup as JG is leaving the group. Volunteers should contact Lorraine.bennett@local.gov.uk.

7. Exit payment reforms

Update on latest position

[The Restriction of Public Sector Exit Payments Regulations 2021](#) were disapplied from 12 February 2021 by [The Exit Payment Cap Directions 2021](#). As a result, exits from 12 February 2021 onwards are not capped. The regulations were revoked by [The Restriction of Public Sector Exit Payments \(Revocation\) Regulations 2021](#) from 19 March 2021.

The Revocation regulations require employers to make any payments that were not paid because of the cap, plus interest. This includes strain cost

payments. The LGA will publish more information about the how to calculate interest and provide examples.

The Scheme Advisory Board (SAB) recommends that administering authorities pay a full pension to any members who qualify for one under regulation 30(7) of the 2013 Regulations. SAB recommends that employers seek to recover any cash alternative payments they have made.

MHCLG has withdrawn their letter of 28 October 2020. They may introduce regulation changes in respect of members who received a cash alternative payment before 12 February 2021. Whether or not these changes are made may depend on the number of cases that would be affected. BC pointed out that no members of the Shropshire Pension Fund had been 'capped'.

Action 5: LGA to survey administering authorities to find out about the number of cash alternative payments they are aware of.

Post meeting update: The Exit cap employer information note and administering authority information note have been updated to reflect the revocation of the cap regulations and to include an interest calculation. You can find the information notes on the [Employer guides and documents](#) and [Administrator guides and documents](#) pages of www.lgpsregs.org.

Administering authorities and scheme employers should be aware that the exit payment cap will be re-introduced. We expect that this will happen later in 2021. It is difficult for employers to plan future workforce reform as they do not know when the cap will be re-introduced nor when any other exit payment reform will take effect.

Future communications

The group discussed what further communications on exit reform are planned or may be needed:

- Include exit reform in member newsletters so members are aware of scheme changes that may be introduced.
- Make sure that employers are aware that further exit payment reform is coming. The timetable is not certain and the further reforms may be of a different form from those proposed in 2020. This is covered by the employer information note, so no further documents are needed at this time.

- Some funds have linked to the FAQs on the member website. LB pointed out that the FAQs have been moved to archived news on the member website. A new page has been introduced on the member website: [Public sector exit cap no longer applies](#).

Action 6: LGA to review member website news page – the page was written following the publication of the Directions that disapplied the cap, but may need further revision now that the regulations have been revoked.

- EAPF have a short news article on their website updating members on the latest position: [EAPF exit cap update](#).
- Home working means that some staff may not keep up to date with the latest developments. Regular staff briefings are vital to make sure the whole team is up to date and shares the correct information with scheme members and employers.

8. McCloud remedy

Update

The [Government has responded to the consultation on changes to the unfunded schemes](#). They will proceed with introducing deferred choice underpin (DCU). All members in scope who have joined the reformed scheme will be moved to the legacy scheme for the remedy period. They will then get a choice of scheme when they take their pension.

We expect MHCLG to issue a ministerial statement on the McCloud remedy for the LGPS in England and Wales in the next two months. This will set out high level policy areas and will be followed by a full response before the summer recess.

Solutions for certain technical issues will be decided on centrally and apply across all public service pension schemes. We expect a central methodology for interest on late payments, rather than calculating interest as set out in the LGPS regulations. We are waiting for a decision on the information that must be included in annual benefit statements. The SAB was opposed to including underpin information in annual benefit statements for active members.

Data collection

Heywood has produced a report that can be used to identify members that meet certain criteria.

The McCloud implementation group produced a suite of documents to be used by funds and employers during the McCloud data collection process.

The group is made up of stakeholders from different organisations, including software suppliers. The group recommended that administering authorities collect data for all members with membership after 31 March 2014 (2015 in Scotland and Northern Ireland). A member who appears not to be in scope of protection may qualify if they have previous membership of the LGPS or another public service pension scheme.

Some administering authorities have not asked for data for all members, presumably using the Heywood report to identify members that meet certain criteria. This has caused problems for other authorities who have requested data for all post-2014 members. Payroll suppliers who work with different administering authorities expect the same approach, and have questioned why data is needed for all scheme members.

AJo recommended a joint approach with neighbouring funds to ensure that funds who work with the same payroll providers ask for the same information.

Action 7: The Chair requested that the LGA includes an article in a future bulletin to clarify the position and remind stakeholders about the guides produced by the implementation group.

The Chair asked about data protection and the legal position concerning requesting data from former scheme employers. LB confirmed that the data relates to a period when they were a scheme employer. They therefore have a statutory obligation to gather the data the administering authority needs to perform an underpin calculation.

Future communications

LB reminded the group that [McCloud FAQs for LGPS members](#) are already available on the member website.

Administering authorities represented on the group are not yet receiving queries from LGPS members about the McCloud remedy. The group agreed that there was no need for further member communications at this point. The group will re-visit the topic of McCloud member communications when MHCLG responds to the [consultation on amendments to the statutory underpin in the LGPS](#).

9. Regional communications group

Welsh regional group

KT gave an update on the work of the Welsh regional group. They are:

- considering all-Wales training events and are currently gauging interest
- working on a Wales version of the short scheme guide; no funds intend to produce a printed version this year
- expanding on topical factsheets eg 85-year rule, producing Welsh language versions and making them available online.

A representative from MaPS will attend the next meeting to talk about pension scams.

Joint communications group – chaired by Shropshire

BC gave an update on the work of the Joint communications group:

- plans for a newsletter covering the exit cap have been overtaken by events
- accessibility is a priority, particularly the member portal
- work has started on the ABS exercise: statements and newsletters for active and deferred members, vetted by Plain English
- research shows that email updates do not lead to website visits. They are getting help on making communications more engaging to encourage a positive response
- problems associated with home working – external printing and making information available online.

10. Communications work plan

Standing items

ABS: we will not provide a statement template. We will keep this item on the workplan as we will need to produce template wording for McCloud.

Pension tax: LGA will update the factsheet to reflect the freezing of the lifetime allowance until April 2026. The group agreed that the notes that accompany 2021 annual benefit statements will need to cover the lifetime allowance, but there is no need for further member communications at this point.

Member website: videos need to be updated to reflect the pension tax rules that apply for 2021/22. No major changes to the existing member website are proposed because of launch of the new website.

Items for next year

Aggregation letters: to be completed by the end of September.

Digital engagement: guide to be issued by the end of June.

Cost cap: Communications to be produced once HMT publishes Directions are and valuations for 2016 and 2020 completed.

Ill health employer guide: with Lorraine

RO asked whether any members of the group had provided resources for members with low literacy skills or those for whom English is not their first language. Employers had not been able to provide Oxfordshire with any information about how many members are in these groups. The Chair noted that some members bring someone with them to go through letters they have received, which may be because of their literacy skills.

JW confirmed that the Environment Agency uses a system to pass information to employees without IT access via the employer.

KB noted that modern browsers have a tool that will read a webpage aloud which would benefit those with low literacy skills. Kent has satellite offices at council offices. They encourage scheme members to request scheme information in whatever format they need.

Election of Chair and Vice-Chair

The group agreed to Martin Griffiths and Matt Allen serving as Chair and Vice-chair of the group respectively for a further two-year term.

11. AOB

Electronic deferred ABS and accessibility

BA asked whether other funds were making benefit statements for deferred members available online and how they were ensuring that those statements were accessible?

Many funds reported that publishing statements online is the default, with paper statements only being issued to those who have opted out of digital communications. Online statements are generally shorter and contain less information than the printed statements that funds used to produce.

LB confirmed that funds must provide deferred members with an annual statement in accordance with regulation 89(1) of the LGPS Regulations 2013.

Most funds were not certain that the documents they made available online were fully accessible, whether they publish the EDP document produced by Altair or upload a PDF.

Heywood has confirmed that it is complying with [The Public Sector Bodies \(Websites and Mobile Applications\) \(No. 2\) Accessibility Regulations 2018](#). RA noted that regulation 4(2) excludes certain extranets and intranets from the regulations. Extranets and intranets are defined as 'a website that is only available for a closed group of people and not to the general public'. Although the regulations may not cover the contents of an intranet or extranet (until they undergo substantial revision), many funds aim only to publish content that is accessible.

No group members had included an online statement as part of an accessibility audit. The group decided to revisit this topic at a future meeting.

Accessibility and pdfs (SG)

SG has received PDFs from third parties that the supplier claims are accessible, but they are not.

KB said that Adobe Acrobat Pro can be used to check the accessibility of externally supplied documents. It is also important to ensure that you follow the correct process when saving a Word document as a PDF to ensure that the accessible formatting is retained. There are many useful online resources, including these:

- [creating accessible PDFs](#)
- [creating accessible PDFs in Adobe Acrobat](#)
- [tagging tables correctly in a PDF](#)

Many funds are moving away from PDFs. LB drew the group's attention to the Government Digital Service's [Guidance on why content should be published in HTML and not PDF](#).

ABS format

The group discussed whether they plan to include figures at 31 March after actuarial adjustment in benefits statements for active members between age 55 and NPA on that date.

Annual benefit statements must include the information set out in Parts 1 and 2 of Schedule 5 to the [Occupational and Personal Pension Schemes \(Disclosure of Information\) Regulations 2013](#). If funds choose to provide actuarially reduced figures, these would need to be in addition to the unreduced figures payable at NPA. You can read more about the information that must be included in member statements in the Annual benefits statements Technical Guide. You can find the guide on the [Administrator guides and documents](#) page of www.lgpsregs.org.

Prudential service

JW raised the poor service that they have received from Prudential, including excessive waiting times to get through by phone. These problems followed the migration to a new platform and an ongoing reconciliation exercise that Prudential aims to finish by the end of March.

The LGPC secretariat raised this with the Pensions Regulator, who encourages funds to [report the problems to TPR](#) via the whistleblowing route. We understand that Prudential has made multiple distress and inconvenience payments in connection with delayed disinvestments. Prudential had been operating a target of 30 working days for a disinvestment.

GDPR

KT noted that the GDPR Q&A document includes a 2018 date as future date. In LB's view, the purpose of this document was to inform scheme members about the introduction of GDPR in 2018. The LGA did not expect to keep this updated as GDPR is now the norm.

Action 8: LGPC Secretariat to consider updating the GDPR Q&A.

Post meeting update: the LGPC secretariat has archived the GDPR Q&A. Each fund's privacy notice should inform members of the information that is still relevant in the Q&A.

12. Future meetings

The next meeting will be held in June and will be virtual.

We intend to hold a hybrid meeting September, but the final decision will depend on what restrictions are in place and the views of the group towards travelling.