

Communications Working Group

Agreements and actions

Thursday 6 July 2023 – hybrid

1. Apologies and introductions

Present

Alastair Johnston (**AJo**) Durham Pension Fund
Amanda Jupp (**AJu**) Kent Pension Fund
Andy Hemming (**AH**) West Midlands Pension Fund
Ben Altoft (**BA**) Avon Pension Fund
Guy Hayton (**GH**) Merseyside Pension Fund
Karen Thomas (**KT**) Gwent (Torfaen) Pension Fund
Kath Meacock (**KM**) Flintshire Pension Fund
Lindsey Davison (**LD**) Tyne and Wear Pension Fund
Lorraine Bennett (**LB**) LGPC Secretariat
Madelena da Costa (**MdC**) Buckinghamshire Pension Fund
Mandy Judd (**MJ**) Hampshire Pension Fund
Martin Griffiths (**Chair**) Warwickshire Pension Fund
Rachel Abbey (**RA**) LGPC Secretariat
Rebecca O'Shea (**RO**) Oxfordshire Pension Fund
Sharon Grimshaw (**SG**) Northamptonshire Pension Fund
Sinead Nicholson (**SN**) NILGOSC
Stuart Duncombe (**SD**) West Yorkshire Pension Fund
Tim O'Connor (**TO**) Enfield Pension Fund

Apologies

Kevin Gerard (**KG**) Carmarthenshire Pension Fund
Jacinta Wilmot (**JW**) Environment Agency

Not present

Louise Campbell (**LC**) North East Scotland Pension Fund

The Chair welcomed everyone to the meeting and welcomed two new members to the group: Madelena da Costa (Buckinghamshire) and Tim O'Connor (Enfield) introduced themselves.

2. Subgroups

Digital engagement subgroup: Becky O'Shea, Kath Meacock, Stuart Duncombe, Jacinta Wilmot, Amanda Jupp and Sharon Grimshaw.

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

McCloud comms subgroup: Martin Griffiths, Sharon Grimshaw, Kath Meacock, Lindsey Davison and Amanda Jupp.

McCloud ABS subgroup: Guy Hayton, Jacinta Wilmot, Louise Campbell, Stuart Duncombe, Kevin Gerard.

McCloud letter templates subgroups: Stuart Duncombe, Martin Griffiths, Amanda Judd, Karen Thomas.

3. Actions and agreements from last meeting held 27 April 2023

RA reviewed the actions from the last meeting:

- Action 1: No examples of poor results from the search function on the member website have been received.
- Action 2: LGA team has started work on strike communications for employers and members.
- Action 3: Becky Clough was not able to share accessibility user guides in use at Shropshire Pension Fund with the group.
- Action 4: The agenda for this meeting has been updated to include accessibility as a topic.
- Action 5: Neither the Chair nor the LGA has received any ideas about news items or other changes for the member website.

SG asked whether we plan to announce the change in early retirement factors on the member website. LGA already planned to update the relevant page on the website, but we will also add a news article.

- Action 6: Digital engagement survey is covered later in this meeting.

- Action 7: AH to feedback on younger member engagement at the end of the West Midlands project. This is not expected to be until April 2024.
- Action 8: McCloud procurement will be covered later in this meeting.
- Action 9: Aggregation letters will be covered later in this meeting.
- Action 10: Thank you to SG for sharing information about digital signatures with the group.

Action 1: LGA to update member guides and website to reflect the early retirement factor changes and add a news article to the website.

4. Member website

General discussion

As discussed at previous meetings, the reports available from Google analytics have changed. The LGA asked the group:

- for feedback on the report provided after the last meeting
- whether any other information would be useful to them
- how frequently the LGA should produce the reports.

The group agreed that the most useful data was on which pages received the most traffic. More information on where users get to the site from would also be interesting.

Action 2: LGA to provide reports on usage of the member website quarterly, to coincide with this meeting. Those reports to include data on the most visited pages and more detailed information on how users reach the site.

Accessibility audit

The accessibility audit of the member website has proved to be a challenging process. Problems raised in the original test have been solved, but on re-test, issues not identified during the first test have been highlighted. We have made lots of changes to improve the accessibility of the site. The process has been protracted because of disappointing delays on the side of the audit supplier.

SN has experienced the same problem of issues being identified at the re-test stage that did not show up in the original test. But they have not suffered from the same problems with communication and delays with the audit supplier. They have concerns about how to keep the website accessible after the audit is complete. Even small changes can undo accessible features that they have already built. They are considering the best approach to maintain accessibility in

future years. They do not plan to undertake an external audit annually due to the time and resources this involves.

News section

Action 3: Members of the group to email the Chair, RA and LB if they have any ideas about news items or articles to include on the member website.

5. Engagement

General discussion

SD asked whether the LGA or funds on the group plan to do anything to mark Pension Awareness Week. There was conflicting information about the dates of this year's event, but www.pensionawarenessday.com confirms that it will run from 11 to 15 September 2023.

- The LGA will put a promotional article on the member website
- Some funds pass on the message to members via their employers
- Some funds will use LinkedIn to draw attention to relevant events and resources.

Action 4: LGA to promote Pension Awareness Week on the member website.

The group discussed the move to electronic communications:

- some funds only make payslips available electronically, with paper copies available on request
- this has environmental benefits as well as saving money
- there has been some resistance from Pension Committees who have concerns about digital exclusion
- some governance teams are also reluctant to stop sending paper payslips as returned undelivered payslips help to identify changes of address and deaths.

Digital engagement survey

Current pressures of work mean that RA has not yet been able to issue the digital engagement survey. The group agreed to delay the survey until January 2024. If any substantial changes are needed, these can be discussed at the next meeting or at a meeting of the relevant subgroup.

Action 5: RA to finish the survey and share it with the group/subgroup before the October meeting.

6. Accessibility

General discussion

The group discussed recent accessibility issues that they have experienced:

- Deciding whether creating a webpage for a newsletter would be more accessible than producing a pdf.
- Some funds have decided to commission an entirely new website as this is easier and quicker than trying to make an existing, old website fully accessible.
- The attitudes of 'host' councils are mixed. In some cases, the pensions team is ahead of the rest of the organisation on website accessibility, in others the pensions team is reliant on the accessibility expertise of the host council.
- Receiving inaccessible documents from third parties remains a problem. Documents from pools and actuaries in particular were mentioned. One suggested solution is to publish the document as it is supplied and use the accessibility statement to tell users how to request a copy in a different format.

Members of the group have received training on different topics from various organisations.

Action 6: Members of the group to send information about accessibility training they have received to RA.

7. McCloud remedy

Latest updates

On 6 April 2023, DLUHC responded to the [2020 consultation on the underpin](#). They launched a [further consultation on the McCloud remedy in the LGPS](#) which ran from 30 May to 30 June 2023. The equivalent [SPPA consultation](#) on McCloud and LGPS Scotland is open until the end of July.

Responses to the DLUHC / SPPA consultation

The LGA has responded to the DLUHC consultation. We were generally supportive of the policies that were proposed, but made a number of technical comments about whether the draft regulations deliver the policies as intended.

We also raised concerns about timing and the small amount of time that administering authorities and software suppliers will have to change their processes and calculations before 1 October 2023.

Those funds represented on the group that had submitted a response to the DLUHC consultation had broadly echoed the LGPC response. One had raised concerns about loopholes in the legislation and the possibility of future rule changes to correct them.

DLUHC and LGA recognise that much more information, guidance and legislation are needed for members with excess teacher service. Very little progress has been made so far.

McCloud – general discussion

The group discussed disclosure and general communications concerning the McCloud remedy:

- The group agreed that there would be a disclosure requirement to inform members about changes to the Scheme rules from 1 October 2023.
- Most funds expect to issue general information about the rule changes, with an indication of when information about a member's personal circumstances will be communicated.
- Some funds are considering 'warm-up' communications in advance of the changes coming in. The current message is getting stale because of the lack of movement, but there is little member interest yet.
- It is important that communications make it clear that protected members do not need to do anything - they will be told if they are affected.

Post meeting update: Those with previous membership of the LGPS or another public service pension scheme may need to take action. We expect LGPS funds to give members who appear not to be protected an opportunity to disclose any earlier relevant pension scheme membership.

- One fund is sending their annual newsletter in October instead of August to prevent them having to communicate with the same member groups twice in a short period.

Action 7: Group members to share their 2023 McCloud wording for annual benefit statements or newsletters with RA and LB. LGA will consolidate and share the results.

The group discussed the challenge of communicating about McCloud in standard letters:

- These fall broadly into two groups: 'BAU' letters going forwards such as aggregation option letters, retirement letters ('quote' and 'actual' stages) and deferment or deferred refund confirmation letters, and retrospective letters concerning past retirements and deferments.
- Some funds have started to look at existing 'BAU' letters to assess how many will need to be amended.
- Funds will have different styles and processes, so they do not want entirely new letters. Instead, the group agreed that paragraphs that can be inserted into existing letters would be useful.

The Chair, SD, MJ and KT agreed to form a subgroup to work on McCloud paragraph templates.

Action 8: One more member of this subgroup would be welcome – please contact the Chair and RA if you would like to join this group.

Action 9: Subgroup to consider what letters will need amending for McCloud and to produce template paragraphs to add to existing letters.

McCloud procurement

LB updated on the procurement process for McCloud communication resources. The LGA intends to make a direct award using the National LGPS Framework for pensions administration and operational support services. Planned new resources include:

- an article on the member website News carousel
- 5-6 new pages on the member website
- a short animation – one for LGPS Scotland, one for LGPS England and Wales, plus a Welsh language version
- an interactive tool for members to find out if they are affected
- a factsheet for members.

The group discussed the member factsheet:

- LGA does not intend to publish the factsheet on the website – we will use HTML instead. The factsheet will be for administering authorities to use.

- The group wants to be able to hand out factsheets at events and post physical copies to members who do not use the internet.
- Administering authorities and employers may decide to publish a PDF version of the factsheet on their own websites.
- The preference was for a template Word version. This will allow administering authorities to amend the factsheet easily to include their contact details and other fund-specific information.
- There was no demand for a PDF version as this would be much more difficult to amend.
- The factsheet is likely to include some graphics. This should not cause an issue for paper copies. Any funds that make a PDF version of the factsheet available online will be responsible for ensuring that it meets the relevant accessibility requirements.

Action 10: McCloud communications subgroup to meet before the next meeting to consider proposals for the new resources.

McCloud comms subgroup

The Chair announced that the Vice-chair has now left the group following a job change. This leaves a space on the McCloud communications subgroup. SG volunteered to join the subgroup.

8. Pensions dashboards

Latest update

Following the DWP Written Ministerial Statement in March, a further statement was published in June 2023 giving an update on pensions dashboards. The latest statement confirms the removal of the phased staging deadline from legislation, replacing it with a single connection deadline of 31 October 2026.

The DWP and MaPS will publish guidance setting out connection deadlines for individual schemes. The guidance will not have the same legal standing as the previous deadlines set out in legislation, but schemes will have to have regard to it. We do not yet know when the guidance will be published.

TPR has encouraged schemes to continue preparing for dashboards by considering data quality and how to improve it, choosing an ISP provider etc.

The group has not received queries or comments from members about dashboards yet. We expect to produce national communications when the

dashboard available point is approaching which is likely to increase interest. There will be six months' notice of the dashboard available point.

9. Cost of living

General discussion

The group discussed changes in member behaviour and their communications in response to the cost of living crisis:

- increased member interest in opting out and moving to the 50/50 section – one fund ran out of 50/50 option forms at a member event for employees
- promoting the 50/50 section to members as an alternative to opting out of the Scheme, lack of awareness is still an issue
- using member events such as pensioner coffee mornings to publicise organisations that offer financial assistance, for example [MoneyHelper](#) or [Help for Households](#)
- including links in active and pensioner member newsletters to other resources and support available – this is a change for some funds who had previously only covered LGPS issues in these publications
- creating or expanding pages on member websites dedicated to the support available to those affected by the cost of living crisis.

The Scheme Advisory Board (England and Wales) is currently considering opt out rates and the group looks forward to seeing their conclusions. The group agreed to take this item off the agenda for future meetings. Any new issues can be raised as AOB.

10. Aggregation letters

RA thanked the subgroup for their insightful comments on the draft aggregation letter templates. They had raised some useful points and RA is in the process of updating the templates to reflect those comments. In the main, the changes relate to plain English and the removal of repetition.

RA expects to publish the templates before the end of July.

11. SCAPE rate change

Funds have experienced delays in their software systems being updated when new actuarial factors have been introduced. GAD is engaging with software suppliers to see what they can do to make the process more efficient. The delays have left funds deciding whether to perform manual calculations, put cases on

hold or use the old factors and re-visit calculations when their systems have been updated.

Some funds have added a paragraph to retirement quote letters issued after 30 March 2023 to let members know that the quoted benefits may change. Some funds allow employers to run retirement estimates for their staff. Those that do, recommend adding or amending on-screen wording so that employers know that the benefits may change if the retirement date is in the future and the benefits will be actuarially adjusted.

12. Scheme amendments

LB and RA updated on future changes to the regulations that are expected or needed:

- A consultation on the removal of the requirement to have left because of the offence in forfeiture cases is expected.
- A consultation on equalising the survivor benefits paid to male spouses or civil partners of female members with the benefits paid to same sex spouses or civil partners is expected. The rules will be backdated to 5 December 2005 – the earliest date that a couple could have entered into a same sex civil partnership.
- There are no immediate plans to remove the upper age limit of 75 for death grants. The SAB Chair has raised concerns about this with the Minister because of the possibility of a legal challenge.
- No movement on changes to the LGPS to accommodate the increase in the normal minimum pension age from 55 to 57 in 2028. The LGPS regulations will have to be changed to reflect the increase, but no news of a decision on protections for existing members has been shared yet.
- Public sector exit payment reform remains a Government commitment, although there is no indication of when new rules might be consulted on. Any changes will be introduced for each individual scheme, there will not be a public sector-wide approach. Other public service schemes do not provide unreduced benefits to members made redundant at age 55 or older. There is a possibility that this provision will be changed in the LGPS.

We will add these issues to the agenda for future meetings when any definite changes are announced.

13. Regional communication groups

The Welsh Communications Group has not met since this group last met.

At their most recent meeting, the Joint Communications Group discussed:

- more funds are now contributing to the joint newsletter which reduces the cost and also means they have new ideas about content
- notifying members that their deferred benefit statement is available and the risks associated with email or text notifications
- member communications about McCloud, dashboards and the cost of living
- accessibility and the problem of inaccessible documents produced by third parties
- 'fake' leavers – leaver notification received but no leaver data
- using 'bots' to assist users of the member website and any accessibility considerations
- telephone and email response times and how that differs across funds of different sizes
- the difficulty in training helpdesk staff working from home.

The issue of response times and difficulty in training was echoed at this group. In particular:

- It is easier to learn in the office where you can hear other colleagues and how they deal with certain types of call.
- The operation of a member portal means that a significant proportion of calls are about portal access, not about pensions. This requires different knowledge and skills.
- Those funds with a 10-day target time for responding to emails may duplicate their efforts because the member also phones for a response to the same query.
- Helpdesk staff need a very broad range of knowledge and working from home means a disconnect between 'operational' and helpdesk staff. Solutions could involve greater support from the operational team and a careful approach to call routing so that the calls reach the appropriate person.

- Some funds have seen an increase in the number of aggressive callers who are more demanding and short-tempered. This could be due to a backlog of cases, or because more people want to access their deferred benefits quickly because of the cost of living crisis. Staff need customer service skills as well as pensions knowledge. Some funds have introduced training on customer service techniques, resilience and difficult conversations.

Action 11: The group to discuss this topic again at the next meeting and decide whether this group is the appropriate forum.

14. Communications work plan

Action 12: LGA to review the communications work plan and make any changes needed before the next meeting.

15. AOB

No issues raised by the group.

16. Election of Vice-Chair

Following the departure of Mathew Allen from the group, AH was nominated as Vice-chair.

The group agreed to the election of AH as the Vice-chair for the next two years.

17. Future Meetings

The next meetings will be on: 12 October 2023 – 11am to 3pm (in person)
 11 January 2024 – 11am to 2.30pm (hybrid).