

Communications Working Group

Agreements and actions

Thursday 27 April 2023 – Smith Square

1. Apologies and introductions

Present

Alastair Johnston (**AJo**) Durham Pension Fund
Andy Hemming (**AH**) West Midlands Pension Fund
Becky Clough (**BC**) Shropshire Pension Fund
Guy Hayton (**GH**) Merseyside Pension Fund
Jacinta Wilmot (**JW**) Environment Agency
Karen Thomas (**KT**) Gwent (Torfaen) Pension Fund
Kevin Gerard (**KG**) Carmarthenshire Pension Fund
Lindsey Davison (**LD**) Tyne and Wear Pension Fund
Louise Campbell (**LC**) North East Scotland Pension Fund
Mandy Judd (**MJ**) Hampshire Pension Fund
Martin Griffiths (**Chair**) Warwickshire Pension Fund
Rachel Abbey (**RA**) LGPC Secretariat
Sharon Grimshaw (**SG**) Northamptonshire Pension Fund
Sinead Nicholson (**SN**) NILGOSC
Stuart Duncombe (**SD**) West Yorkshire Pension Fund

Apologies

Amanda Jupp (**AJu**) Kent Pension Fund
Ben Altoft (**BA**) Avon Pension Fund
Kath Meacock (**KM**) Flintshire Pension Fund
Lorraine Bennett (**LB**) LGPC Secretariat
Matthew Allen (**vice-chair**) Cornwall Pension Fund
Rebecca O'Shea (**RO**) Oxfordshire Pension Fund
Tim O'Connor (**TO**) Enfield Pension Fund

The Chair welcomed everyone to the meeting and noted some changes to the group:

- Mandy Jupp has moved to a new job with Kent CC and will continue as a member of the group.
- Karen Brooker from Kent has given up her place in the group
- This will be Becky Clough's last meeting as she will be starting a new job with the Scheme Advisory Board in May.

The Chair thanked Karen and Becky for their service and contributions to the work of the group. BC thanked the group for all the work they do to support administering authorities.

2. Subgroups

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

Letter templates subgroup: Stuart Duncombe, Sharon Grimshaw, Mandy Judd, Karen Thomas, Andrew Hemming.

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.

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

3. Actions and agreements from last meeting held 10 January 2023

RA reviewed the actions from the last meeting:

- Action 1: the decimal point issue on lost pension calculator has been solved. The problem had been corrected once, but occurred again for one administering authority. LGA relies on being told about these problems as they may not arise for everyone.
- Action 2: RA will share the member website usage report with the group after the meeting.
- Action 3: Updated to news and FAQs sections of the member websites – covered later in these meeting notes.

- Action 4: digital engagement survey is covered later in these minutes.
- Action 5: LB shared the questions from the digital engagement survey with the subgroup shortly after the January meeting.
- Action 6: engaging with younger member added to the workplan for 2023/24.
- Action 7: McCloud procurement is covered later in these meeting notes.
- Action 8: subgroup submitted feedback on the aggregation template letters before the deadline.
- Action 9: LB has created the 2023/24 workplan and uploaded it to the [Communications Working Group](#) page of the LGPS administrator website.

4. Member website

General discussion

LB has updated the member websites to reflect the usual annual updates and further recent changes, including:

- Calculators updated
- Member contributions tables
- McCloud FAQs
- Content updated in response to pension tax rules changes
- Removed the lifetime allowance (LTA) modeller.

LGA has requested the changes needed to the annual allowance video. The LTA video is still currently available. LGA will make a decision on whether a replacement is needed or whether the LTA video can be withdrawn once the rules that will apply from April 2024 are clear.

The employee brief guide and retirement planning guide have been published and the remaining guides will be updated and published in the coming weeks.

The Chair asked for any comments or feedback on the member websites.

KG asked whether the search facility could be improved. His team has found examples where they get more useful results by searching in Google instead of using the search facility on the website.

JW noted that strikes in the Environment Agency workforce had led to a large increase in the number of people using the 'Lost pension' calculator. The calculator has worked well and there has been no negative feedback. JW asked whether the introductory text on the 'Lost pension' calculator page could be updated to refer specifically to strike breaks.

Post-meeting update: Some unions are balloting their members on strike action. If strikes go ahead, there may be demand for more information about strike action and the impact on LGPS pensions.

Action 1: KG to provide examples of problems with the Search facility.

Action 2: LGA to review content about strike action on the member websites and update as needed, noting JW's feedback about the calculator page.

Accessibility audit

The member website accessibility audit process has not yet been completed. The re-test has now been done, which has identified a large number of instances of the same minor issues. These will be fixed by the company who designed the website as agreed in the contract. The LGA has had difficulties in contacting the company running the audit. It is not certain when the website will be certified because the delays mean that the 'normal' deadline for completion has been missed.

The group discussed recent and current issues with accessibility:

- Many funds are devoting significant time and resource to ensure their digital content meets the accessibility requirements, including periodic training.
- Even a small change to a document or form involves lots of subsequent checks and updates to ensure accessibility.
- There is a lack of understanding about accessibility from other stakeholders, including those within the administering authority, meaning that they supply documents that are not compliant.
- Funds are required to publish their annual report, but actuaries are not providing an accessible version.
- The current rules are set out in WCAG 2.1, but 2.2 is about to be published which is likely to introduce new requirements.

Action 3: BC to share user guides on accessibility that Shropshire have produced.

Action 4: Keep accessibility as a general topic on the group's agenda, separate from the member website discussions.

News section

LGA has added news articles to the member websites about:

- the contribution bands in operation from 1 April 2023
- the changes to pensions tax made in the Spring Budget, and
- the Government response to the 2020 underpin consultation (E&W).

The Chair invited any comments about any additions the group had made to their local websites, and ideas for future articles.

The group noted an increase in interest when pensions are more prominent, such as the recent Martin Lewis Money Show Live about pensions. Care is needed because a programme such as this is likely to be geared more towards defined contribution schemes. Some funds have promoted topics covered or connected with the content of a programme such as this, rather than to promote the event itself.

Action 5: Members of the group to email the Chair and RA if they have any ideas about news items or articles to include on the member website.

5. Engagement

Digital engagement survey

RA thanked the subgroup for their comments on the digital engagement survey. It has not been possible to run the survey yet because RA's time on LGA projects has been limited due to her ongoing secondment.

RA asked the group how many of them were currently reporting on how many members had used the portal in the last year. This is to ensure we are only including questions in the survey that most funds will be able to answer based on reporting that they are already doing. A majority of funds represented are currently reporting on this. RA agreed to include the question, but that it would not be compulsory. This will allow those funds that are not reporting on this to complete the survey.

The group discussed the timing of the survey. The original plan was to run the survey annually in January. It was not possible to run the survey in January 2023 as intended. The group decided to run the survey as soon as possible. They will then make a decision on the frequency of future surveys based on the response rate and the level of difference between the survey results this time compared with the results from the 2021 survey.

Some Pension Boards are showing an interest in the level of sign-up. Being able to benchmark sign-up figures across the country will help funds and their boards to assess their current participation rates.

Action 6: RA to run the digital engagement survey as soon as possible.

General discussion on operating a member portal

The group discussed any recent issues that have arisen in operating a member portal:

- Funds use Google Analytics for detailed information page 'visits' on the member portal, rather than standard reports available through the pension software supplier.
- 'Tag manager' can be used to find out how many people have clicked on a particular button, for example to download a document.
- Google Analytics Universal is being withdrawn in July 2023 and replaced by GA4. Users may need to take action to ensure their reports are still available after the changeover.
- SN's experience is that member presentations are a good forum to encourage members to sign up to the portal. However, even a relatively small number of users accessing the same part of the portal can cause it to crash.
- Other funds stagger email communications about annual benefit statements etc to limit the number of people trying to access the system at once. The problem had been experienced by users of both of the two main pension administration software systems. The problem may depend on whether the fund is hosted or not.

Younger member engagement

Having discussed engagement with younger members at the last meeting, the Chair asked how the group wants to take this forward.

Funds are considering the best way to engage with younger members. Some Boards and committees are concerned that younger members are not engaged. Trade unions are worried that the cost of living may lead to increased opt out rates. Current experiences of the group in relation to younger members are:

- Opt out rates among younger members are not significantly higher than average opt out rates
- Younger members are less likely to attend a member presentation or use a member portal than older members
- Younger members do not have a good understanding of the benefits offered by the scheme.

The group agreed that the challenge may be to communicate and increase engagement with new scheme members and members who have opted out. These members could be any age. Some members of the group are reviewing or have changed their communications to appeal to all age groups, including:

- Introducing new joiner presentations that concentrate on the benefits and features of the scheme – such as the benefits of joining early, what happens if you leave early – rather than emphasising retirement benefits.
- Adapting wording sent to new joiners so that it is relevant to members of all ages.

Action 7: AH to feedback on his experiences after the West Midlands campaign concentrating on younger members has finished.

The group will decide whether to work on any communications specifically for younger members once AH has fed back (12 months).

6. McCloud remedy

Latest updates

The group has only seen a small number of queries from scheme members about the McCloud remedy. These tend to arise because the member is aware of the issue in a different public service pension scheme. Members of the police and fire schemes are far more likely to have queries about McCloud and this affects the civilian employees and their awareness of the remedy.

RA updated the group on the latest position:

- DLUHC published its response to the 2020 consultation on the underpin in April 2023
- A second consultation is expected in May, after the local elections. The consultation will cover topics not previously consulted on such as interest and compensation, plus policy areas including flexible retirement and aggregation.

Aggregation requirement

The second consultation will seek views on the aggregation requirement to qualify for underpin protection. The group discussed the implications of removing the aggregation requirement:

- There would be no need to re-open the aggregation window.

- Members not able to aggregate (previous pension in payment, opt out after April 2015 etc) would continue to be protected.
- There would be an ongoing requirement when a member who joined before 1 April 2022 leaves the Scheme to check whether they have previous period of membership that means they qualify for protection.
- The NI database could be used as part of the solution to identify protected members.
- The Government may decide to extend protection to members protected in another public service pension scheme, even if that membership is not transferred to the LGPS. Identifying members in this group would pose a significant challenge.
- Funds may choose to undertake a one-off exercise to identify protected members, but most are likely to offer a further opportunity to declare any relevant previous membership when the member leaves or in annual benefit statements.

RA encouraged members of the group to respond to the next underpin consultation if they have strong views on aggregation.

DLUHC member comms on McCloud

The group discussed the McCloud member factsheet published by DLUHC with the Government response to the 2020 consultation. DLUHC are currently working on a Welsh language version.

The group were generally positive about the factsheet. Most funds have not published the factsheet, or have published it without a great deal of publicity. The factsheet directs members to contact their pension fund for more information about how they will be affected by the McCloud remedy. Some funds were concerned that they would not be able to respond to queries like this until more information about the final regulations are known.

The factsheet informs members that information about the McCloud remedy will be included in annual benefit statements from 2025 onwards. Software suppliers generally follow the annual benefit statement technical guide produced by the LGA. The group recommended changing that document to reflect the additional requirements as a result of the McCloud remedy.

It is not clear exactly how the underpin must be reflected in annual benefit statements. Including a conditional paragraph may offer an opportunity to remind members who do not appear to be protected to tell their administering authority

about any relevant previous membership of the LGPS or another public service pension scheme.

The group decided to set up a subgroup to work on template wording to include in annual benefit statements from 2025 onwards. GH, JW, LC, SD and KG volunteered for the group.

McCloud procurement

LGA has recently joined the LGPS framework so we intend to use that to procure a supplier for McCloud communication resources.

A decision on whether there will be an aggregation requirement will be needed before we can produce final versions of communications. In the meantime, we can decide what resources to produce, work on design and produce content for those members not affected by the aggregation decision.

Action 8: LGA to start the procurement process for McCloud resources using the LGPS Framework.

7. Pensions dashboards

Latest update

The LGA pension team has had early discussions with AVC providers about how AVC data will be provided to the dashboard. The choice is between the AVC provider supplying the data directly to the dashboard or supplying it to the pension administrator. The ideal result would be a consistent approach across all providers. The LGA will send out a survey to gather views from administering authorities before further discussions with AVC providers.

Funds represented on the group are continuing to cleanse their data in preparation for the launch of dashboards. Some suppliers are offering a service that identifies members that are about to move house. This allows the pension fund to contact them before their moving date to remind them to tell the pensions team about their new address.

The National LGPS Frameworks will be launching a framework for dashboard ISP providers later in 2023. Funds have the option to use the ISP solution offered by their pension software supplier, but other providers have entered the ISP market.

Connection delays

The DWP announced delays to connection deadlines in March 2023. Connection dates in 2023 are likely to be pushed back. It is not clear yet whether there will be any change to connection deadlines for public service pension schemes.

8. Aggregation letters

RA thanked the subgroup for providing feedback on the aggregation letter templates. It has not been possible for RA to consider the feedback yet due to her secondment, but this is now high on her task list.

The subgroup confirmed that the comments they have made are minor and they do not need to see a final version of the letter templates before they are published. Small changes are also needed to reflect the changes to the Lifetime allowance introduced in the Spring Budget.

Action 9: RA to finalise the templates based on subgroup comments and lifetime allowance changes and publish them by the end of June 2023.

Not all funds currently quote the value of benefits in an aggregation 'quote' letter as this is a manual process. Some consider this is an improvement to help member decision making. Other funds have the option of amending the templates to suit their local processes.

9. Pension tax

The group discussed the recent changes to pension tax rules in the Spring budget. LB has updated the member website to reflect the changes.

The group has mainly used websites and newsletters to cover the changes. There is currently some uncertainty about how the tax free lump sum limit will operate when the lifetime allowance is removed from 2024. The group agreed that no standard wording is currently needed. The group will re-visit this topic once we have more information about the changes from April 2024.

10. Revaluation date change

The LGA view, supported by a legal opinion, is that this is not a material change under the 2013 Disclosure Regulations. Although there is no legal requirement to communicate the change to members, it would be good practice to do so.

The group has mainly used websites and newsletters to cover the change. The change will affect a small proportion of members and therefore the group did not see the need to push the communications too strongly. Funds had already written

and published their own communications on this subject. The group did not see the need for any wording to be agreed centrally.

11. SCAPE rate change

The announcement of the change in SCAPE rate on 30 March 2023 means that certain calculations are on hold pending the publication of new factors. The reduction in SCAPE rate is likely to mean:

- An increase in transfer out factors
- An increase in transfer in factors (meaning a transfer value will buy a lower credit based on the new factors)
- An improvement in early retirement reduction factors
- A reduction in late retirement increases, although the current methodology means that this will only affect the increase that applies from the date the new factors are implemented. If the methodology is unchanged, there will be no reduction to the increases that apply up to the date of the change.

The group was happy to continue with locally agreed wording on the assumption that new factors would be issued soon.

12. Regional communication groups

At its most recent meeting, the Welsh Communications Group discussed:

- working together to procure LGA training
- McCloud communications, and their conclusion was to wait for output from this group
- Websites and cyber security
- The need for a professional qualification that is LGPS specific which would help to retain and develop staff.

RA updated on the latest on training from the LGA. In-person training offered by the LGA has had a low take-up compared with online training. We will deliver in-person training when it is requested in a location or region. The LGA and SAB recognise the demand for a professional qualification. They are looking at options to deliver this.

Most of the issues discussed at the Joint Communications Group chaired by Shropshire have been covered at the meeting already. Other topics discussed included:

- joint annual benefit statement newsletters
- Digital signatures – if funds are accepting them and what to consider
- TPR scam pledge.

Most administering authorities represented on the group had already signed up for the TPR scam pledge or are in the process of doing so. They are now considering how (or whether) to communicate the scheme to members. There is a view that embedding the principles in processes and communications is more important than publicising that a fund has made ‘the pledge’.

Action 10: SG to share useful information about digital signatures with the group.

13. Communications work plan

RA summarised the [group's workplan for 2023/24](#).

Exit payment reform has been removed from the workplan because there has been no movement in this area for some time. We have also disbanded the subgroups which had agreed to work on this area. However, reform of exit payments remains a Government policy. We will return this topic to the workplan if there are any developments.

14. AOB

The group raised a number of other issues:

- **Ill health retirement certificates** – including a member's previous name(s) on the form so that the IRMP can find any previous reports for the member. The group supported the change. LGA will make the change when the forms are updated later in 2023.
- **Partial flexible retirement** – most funds do not promote this option because the administration systems are not configured to allow for it. Manual corrections are needed to set up records correctly. But the small number of cases means that there is little demand for system changes.
- **PLSA retirement living standards** – one fund had been paying towards this initiative. They originally received publicity materials, but received less in later years. No one else had paid to support the project.
- **Preserved refunds** – and the option to transfer when the member is approaching normal pension age. A transfer is not possible if the member was given a deadline to apply for a transfer and they did not respond in

time. Different approaches where the member had not been given a deadline.

- **Retirement planning guide** – do funds send paper or digital version of this guide? Changes to the member websites and MoneyHelper means that some links are now very long. Only one fund represented sends a paper version and so LGA will proceed with changing the links to hyperlinks.
- **MSS accessibility** – currently, the conversion of Word documents to pdfs on MSS does not preserve accessibility features. Heywood intend to fix this issue in the 23.3 release.
- **Membership of the group** – the departures of Karen Brooker and Becky Clough mean that there are two vacancies on the group. These will be taken by Tim O'Connor (Enfield) and Madelena da Costa (Buckinghamshire). We will operate a waiting list if anyone else expresses an interest in joining the group.

15. Election of Chair and Vice-Chair

The group supported Martin Griffiths continuing as Chair of the group for a further two-year term.

The group also supported Matthew Allen continuing as Vice-Chair, in his absence. The Vice-Chair will be confirmed at the next meeting.

16. Future Meetings

The group was positive about this meeting being held in person and agreed on a change to two in-person meetings a year and two hybrid meetings, to be held on a Wednesday or Thursday.

The next meetings will be on:

- 6 July 2023 – 11am to 2.30pm (hybrid)
- 12 October – 11am to 3pm (in person)
- 11 January 2024 – 11am to 2.30pm (hybrid).