

National LGPS Technical Group

1 October 2021

Regional Pension Officer Group active ABS Disclosure updates

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1. Group members to provide local disclosure practices concerning active online annual benefit statements2

Table 1

	<p>1. Group members to provide local disclosure practices concerning active online annual benefit statements (ABS)</p>
<p>WPOG</p>	<p>Cardiff</p> <ul style="list-style-type: none"> • not in a position to offer ABS online yet <p>Gwynedd</p> <ul style="list-style-type: none"> • email has been sent to all active and deferred members who's record had an email address recorded to let them know that the statement is available • an email was sent to each employer in the fund to request that they inform their staff that the annual benefit statement has been loaded to MSS • news item has been posted on our website to inform members that the statement is now online • a letter will be going out to members who have not received an e-mail to state that the statement is online and to encourage them to sign up to MSS <p>Powys</p> <ul style="list-style-type: none"> • we will send out emails to all active members where an email address is held to inform them that their ABS is available to view online • those that have opted out of E-comms will get a hard copy • once new staff are in place, we will run a campaign to get members registered and using their accounts if not logged in recently

For completion by representatives of the regional pension officer groups

- don't have the staff currently do deal with extra MSS access and registration queries that come with a registration campaign

Swansea

- in 2019 and in line with Disclosure Regs we issued three separate E-Coms notices to all active & deferred members confirming that going forward member communications were going to be issued via E-coms and promoting MSS
- members were given the option to opt out however they had to put this in writing - members who failed to respond we assumed had opted for E-coms
- further to the completion of the ABS exercise those members who have signed up to MSS are emailed confirming availability of the statement

Torfaen

- all annual benefit statements are published online
- members already signed up to MPO receive an email informing them their ABS is now available to view.
- those members who have not signed up to MPO receive a letter in the post informing them that their ABS is available on MPO and they need to register for this service to access their ABS active, and deferred ABS are published on the website for all members
- if members wish to receive a paper ABS, they are asked to notify the fund, and these are sent out in the post to the members

Clwyd

	<ul style="list-style-type: none"> • we email all active members who have signed up for MSS to notify them that there ABS is available to view via the portal <p>Dyfed</p> <ul style="list-style-type: none"> • letters issued to state ABS available on-line to individuals for whom we do not hold an email address <p>Rhondda Cynon Taff</p> <ul style="list-style-type: none"> • we upload the active benefit statements to My Pension On-line • members who are registered for MPO get an email informing them that it is there, members who are not registered get a letter and/or email letting them know how to register to view their statements • we also record who has elected for paper statements and issue them in that format
EMPOG	<p>Received from Ian Howe on 20/08/2021</p> <p>Leicestershire</p> <ul style="list-style-type: none"> • email all members for whom we have email addresses to tell them their ABS is online • write to the employers to ask them to remind their employees that the ABS are online • write to employers to remind employees that they need to sign up for member self-service (MSS) • set a key performance indicator (KPI) for monthly MSS take up • working with specific employers to increase MSS take up and reporting the findings to the Pension Board • in all paper communications to members, we remind them to sign up for MSS • provide paper versions to members who make a request <p>Derbyshire</p>

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- as this is our first year online, we are writing to all active members to notify them that their ABS is ready online
- the plan for 2022 is to email those that have registered for online ABS, and write to the rest to encourage online take up
- we are likely to get employers to notify their staff

Nottinghamshire

- currently do not use online so continue with paper statements

Lincolnshire

- this year we are transitioning to online statements, so our members fall into one of three groups:
- Group 1 - previously opted out of electronic communications - these members will receive a paper statement printed and posted to their home address
- Group 2 - already registered with My Pension - these members will receive an email to their registered email address telling them to log in and view their statement once it's available
- Group 3 - not registered for My Pension and not opted out of e-comms - these members will receive a letter to their home address once their statement is produced inviting them to register and then view their statement.
- we have also pushed employers to promote this approach and set it out as our plan in previous newsletters
- in 2022, group 3 will not be written to, as notified in 2021 newsletter
- we will be relying heavily on employers to reach members for whom we do not have an email address or are not registered with My Pension
- we will provide a fresh marketing toolkit in 2022

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	<p>Northamptonshire</p> <ul style="list-style-type: none"> • we have been operating to an interpretation of regulations 27 and 28 of the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 which appears to suggest that you do not have to notify them each time, if you do not hold an email address, have not had a written notification from them opting out of electronic communications and you have written to members twice asking for their email address, giving them the option to opt of electronic communications and stating that further notifications will not be sent • it also suggests that is only a requirement the first time • we therefore do not send a notice to members with no email address who have not opted out of electronic communications • we have however followed up to let them know they are in this limbo position and asked them to either register or opt out of electronic comms • we will await the thoughts of Technical Group as to whether we need to review our approach
NEPOF	<p>Received from Liz Vollans on 08/09/2021</p> <ul style="list-style-type: none"> • newsletters and targeted emails to all contributing members • we have emailed members who are registered for our online service, members not registered have received a 1 page letter telling them their statement is available online and they need to register to access it, if a member has opted out of electronic communications, we have printed and posted a statement to their home address, we have also provided employers with a marketing toolkit and included information about it over the last few years newsletters • direct email sent to all those registered, posted information on the Fund's website, communicated with all employers advising to inform all their employees that ABS are available, also encouraged promotion campaigns for use of online portal and offered to work in collaboration

For completion by representatives of the regional pension officer groups

	<ul style="list-style-type: none"> • we publish online unless member specifically requests paper copies, where we have email addresses we send an email advising it's available on line, this year we are also adding a message to payslips to four of our largest employers (our largest employer alone is over 50 percent of membership)
SWAPOG	<p>Received from Emma Sanders on 08/09/2021</p> <p>Cornwall</p> <ul style="list-style-type: none"> • do not currently have MSS working on it <p>Devon/Somerset</p> <ul style="list-style-type: none"> • wrote to all members giving them the choice to opt for postal coms under the disclosure regulations, they were all written to three times • all new starters from April 2015 are postal only but still contact those members who have not given any election to opt out or not probably yearly to remind them they have not made an election or registered yet <p>Avon</p> <ul style="list-style-type: none"> • at present it is not possible for APF active members to view their ABS online • we are in a process of digital transformation, and this year (2021) we enabled our deferred members to access their ABS online for the first time • we sent two communications to our members, the first one informing our members of the changes to the MSS terms & conditions, privacy notice and about the ability to access their ABS online, the second email (two weeks later) informed members that their ABS was available to download • almost 10,000 were able to download their ABS from our online portal (Heywood MSS), this proved successful and we will be extending online ABS access to our Active members in 2022

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	<p>Wiltshire</p> <ul style="list-style-type: none"> • our default approach is to issue active ABS to each member's online account (on Altair's MSS), however, if members opt into receiving a paper copy then we will post one out to them each year <p>Environment Agency</p> <ul style="list-style-type: none"> • ABS digital Disclosure - to meet digital disclosure requirements, we informed members on three separate occasions by post to their home address that their annual pension statement is moving to a digital statement • active - in August 2020, we started our ABS disclosure process informing all contributing members that from August 2021 onwards, we plan to send an email to let them know when their statement is ready to view online and that they'll no longer receive a paper statement from EAPF - those who'd like to continue receiving a printed statement can choose to opt out by writing to EAPF - all members who opt out of digital will still receive an interactive ABS in their EAPF online mailbox - we sent our disclosures on 31 August 2020 (combined with ABS cover letters mailed out with paper statements) - 29 March 2021 (single letter mailing) - 28 May 2021 (single letter mailing) • deferred - on 14 June 2021, we started our disclosure process with deferred members and our first deferred disclosure to members with their 2021 deferred pension statement - we plan to issue the second and third deferred disclosure comms in Q1 and Q2 of 2022 with a view to our deferred statements being digital by June 2022 • digital opt out to date (6 August 2021) – 2 percent of active members have currently opted out of digital communications (which represents 269 people) - 0.16 percent of deferred members have currently opted out of digital communications (which represents 15 people) <p>Dorset</p> <ul style="list-style-type: none"> • we issue a paper ABS to all deferred and active members each year
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	<ul style="list-style-type: none"> • in addition, this information is loaded onto our member portal for those members registered, members have the option to opt out of receiving a paper statement
SPOG	<p>Received from Paul Hill on 09/09/2021</p> <p>Fund A</p> <ul style="list-style-type: none"> • those signed up for MyPensions will receive an email confirming when their ABS will be ready to view • for those active scheme members not signed up to MyPensions, a reminder that their 2021 ABS will be viewable issued via scheme employer (together with details as to how they access MyPensions) <p>Fund B</p> <ul style="list-style-type: none"> • we publish our ABS on-line and we inform clients and employers asking them to put a notice on their intranets • in addition, we email all members where we hold an email address to update them directly <p>Fund C</p> <ul style="list-style-type: none"> • we issue our active ABS online, and members access it via our member web, however members do have the option to opt in to receive a paper statement • members who are registered or where we hold an email address are emailed to say their statement is available to view • the Fund's website is also updated to state that ABS are available to view, and information is provided on how to register for member portal • we also advise employers that the statements have been made available

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Fund D

- we do not currently issue an ABS online
- we are planning to move to digital communications and will send a message out via employers, publish on our website and update all correspondence to say that ABS will be made available online each year

Fund E

- we do not currently have active online ABS, we hope to introduce them in 2022

Fund F

- send an email to all active members registered to use online portal, just under 50 percent of membership
- put a message on the website
- require all Fund employers to communicate to their staff
- employers have to positively respond that they have issued the communication to their employees
- this response is tracked and chased by the team

Fund G

- we issue ABS online, and members are emailed to say they have been published
- we also ask our employers to tell members on our behalf and have supplied comms they can use to do this, we are happy this satisfies the requirements
- we will though be writing to members periodically who have not signed up as well to tell them, but at present we are waiting for MSS improvements before scheduling a mailing so the impact of lots of people trying to sign up at once can be managed better and the members get a more positive experience

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SAPOG	<p>Received from Claire Lewis-Smith on 08/09/2021</p> <p>Buckinghamshire</p> <ul style="list-style-type: none"> • all active and deferred annual benefit statement produced online • emails sent to those registered for the online portal when ready to view • employers asked to issue communication to employees that ABS are available & to register for the portal for access if they have not already done so • those who have opted out of online communication receive a hard copy <p>Hampshire & West Sussex</p> <ul style="list-style-type: none"> • all active and deferred members produced online • when statements are available to view, we email members where we hold their email address (not just people registered for the portal) • anyone who has written to request to opt out of electronic communications receives a paper copy • we ask employers to promote when active statements are available to view • we provide employers with material they can use including a notice for their intranet and/or email, a poster and a power point presentation explaining the statement <p>Surrey</p> <ul style="list-style-type: none"> • where paper copies requested these are sent in the post with a covering letter • those registered for the member self-service (MSS), statement uploaded and viewable online with an email sent to the member to inform them of this, with a link to MSS and useful links ie FAQ's/can't log in/forgotten password
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	<ul style="list-style-type: none"> • those we hold an email address for but not registered on MSS, email sent informing them ABS on MSS and to register following the link provided, again with useful links on how to register etc • where no email address held, ABS uploaded to MSS and a letter sent to the member's home address informing them of this and how to register with relevant /useful links • where an email is rejected then a letter is then sent to the member informing them their ABS is available on MSS and that they need to log on, providing the link to MSS and other useful links
LPOG	<p>Received from Richard Smythe on 09/09/2021</p> <ul style="list-style-type: none"> • we still issue our ABS by paper posted to home addresses but are looking to go online within the next two years • all statements are issued online unless members request to opt out of the online service • a letter was issued to members who have not signed up to online services informing them their ABS is ready to view • we bring the information to the member's attention via the Scheme employers who contact all relevant employees • we publish our ABS on-line and we inform clients and employers asking them to put a notice on their intranets • in addition, we email all members where we hold an email address to update them directly • do not have MSS, ABS issued manually by post • we send them all out in the post at present
SECSOG	<p>Received from Louise Savage on 08/09/2021</p> <p>Bedford BC</p> <ul style="list-style-type: none"> • we still send paper annual benefit statement

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- online statements are available for all membership if they choose to log on

Essex CC

- we send paper copies of annual benefit statements to members
- those who have registered for member online also have a digital version available on their account two weeks before the paper ones are posted

Hertfordshire CC

- we publish our annual benefit statements on-line and we inform clients and employers asking them to put a notice on their intranets
- in addition, we email all members where we hold an email address to update them directly

Kent CC

- all statements are sent via post
- statements are not currently available on member self-service which was launched in August 2021

Norfolk CC

- we notify employers and post notice on our website
- however, we also issue paper statements to all actives as well as the online statement

Suffolk CC

- we have been operating in accordance with The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013, regulation 28 which provides that subsequent notifications are not required

For completion by representatives of the regional pension officer groups

	<p>where (to simplify the regulations) three documents have been sent to the member's home address advising them that benefit statements would be online going forward</p> <ul style="list-style-type: none"> we are currently reviewing our practises, however at present our interpretation (of The Public Service Pensions (Information about Benefits) Directions 2014, regulation 7) is that that the work we did in line with the Disclosure Regulations 2013, regulation 28, was sufficient to bring subsequent benefit statements to the attention of members
NILGOSC	<p>Received from Zena Kee on 01/09/2021</p> <ul style="list-style-type: none"> this is the first year that NILGOSC has issued active member benefit statements online we emailed those with valid email addresses to let them know their statement was online and sent a letter earlier in the year to the remainder to advise them that both their annual benefit statement and annual newsletter would be published online we also advised employers that the active member benefit statements are now published online and available
SPLG	<p>Not received by the secretariat of the National LGPS Technical Group</p>

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