

Annual Benefit Statements for Active Members (v1.3)

As a result of the move from a final salary scheme to a CARE scheme on 1 April 2015 (in Scotland), the Local Government Pensions Committee Secretariat was asked to consider what information should be provided on Annual Benefit Statements for active members. This paper sets out the LGPC Secretariat's views and is based on their current understanding of:

- The Local Government Pension Scheme (Administration) (Scotland) Regulations 2008
- The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 [SI 2013/2734]
- The LGPS (Scotland) Regulations 2014
- The LGPS (Transitional Provisions and Savings) (Scotland) Regulations 2014
- The Public Service Pensions Act 2013
- The Public Service Pensions (Information about Benefits) Directions 2014

It should be noted that:

- Regulation 87 of the LGPS (Scotland) Regulations 2014 requires administering authorities to issue an Annual Benefit Statement to all active, deferred and pension credit members by 31 August following the end of the Scheme year to which the Annual Benefit Statement relates.
- By virtue of regulation 87(4), only an Annual Benefit Statement for an active member has to be provided in accordance with the HM Treasury Direction issued under section 14 of the Public Service Pensions Act 2013.
- Thus, an Annual Benefit Statement automatically issued under regulation 87 of the LGPS (Scotland) Regulations 2014 to a deferred or pension credit member does not have to comply with the HM Treasury Direction. Furthermore, regulation 16 of the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 does not apply because that regulation only applies to individual requests for a "statement of benefits", not to automatically produced Annual Benefit Statements. That means that none of the requirements set out in parts 2 to 4 of Schedule 5 to those Regulations (information to be included in the "statement of benefits") nor the requirements of regulations 26 to 30 of those Regulations (how the information is to be communicated to the member) have to be complied with in respect of an automatically produced Annual Benefit Statement.
- Similarly, any Annual Benefit Statement issued to an active member is not issued under regulation 16 of the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 because that regulation only applies to individual requests for a "statement of benefits",

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not to automatically produced Annual Benefit Statements. That means that none of the requirements set out in regulations 26 to 30 of those Regulations (how the information is to be communicated to the member) have to be complied with. However, the HM Treasury Direction requires that the information provided on an Annual Benefit Statement issued to an active member must include the information listed in Parts 1 and 2 of Schedule 5 to the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 and must be provided to the Scheme member in accordance with directions 3 to 8 of the Direction (how the information is to be communicated to the member).

In short, administering authorities must ensure that the Annual Benefit Statements issued to active members comply with the requirements of regulation 87 of the LGPS (Scotland) Regulations 2014 and the Public Service Pensions (Information about Benefits) Directions 2014 issued by HM Treasury under section 14 of the Public Service Pensions Act 2013. The Direction (a copy of which is attached at the end of this paper) simply requires public service pension schemes to provide Annual Benefit Statements to active members which include the information listed in Parts 1 and 2 of Schedule 5 to the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 and sets out the means by which the Annual Benefit Statement may be sent / communicated to the scheme member. Except to the extent required in paragraph 2 of the Direction, administering authorities are not required to comply with the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 for Annual Benefit Statements issued to active members as such statements are produced automatically and not at the request of the individual.

As the requirement to produce Annual Benefit Statements for deferred and pension credit members is contained only in regulation 87 of the LGPS Regulations 2014, administering authorities are not required to comply with the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 for such statements (as they are produced automatically and not at the request of the individual).

It should be noted that this paper does not provide detailed guidance on the information to include on Annual Benefit Statements issued under regulation 87 of the LGPS (Scotland) Regulations 2014 to deferred and pension credit members (as that regulation is silent on the matter). Nor does this paper provide guidance on the information to include on Statutory Money Purchase Illustrations (SMPIs) for money purchase benefits (i.e. AVCs and Shared Cost AVCs).

However, as a result of provisions in the LGPS (Scotland) Regulations 2014 and the LGPS (Transitional Provisions and Savings) Regulations 2014 concerning

- a) death grants, and
- b) aggregation of benefits

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and concerning SMPs, the paper does provide some guidance on notes to accompany Annual Benefit Statements issued to deferred members and information on the date to be used for SMPI projections.

Annual Benefit Statement for active members - 2015/16 onwards

In order to comply with the LGPS (Scotland) Regulations 2014 and the Directions issued by HM Treasury under section 14 of the Public Service Pensions Act 2013 the LGPC Secretariat believes that, in respect of defined benefits, the Annual Benefit Statements for active members for 2015/16 onwards (to be issued by no later than 31 August each year):

- i) must show the current value of the member's final salary benefits (pension and any 3/80ths lump sum), if any, based on membership accrued to 31 March 2015 (payable, for consistency with the CARE statement in (iii) below, from the member's new Normal Pension Age under the 2015 Scheme and including the actuarial increase for the period old NPA to new NPA) and the member's prospective final salary survivor benefits, if any, based on membership accrued to 31 March 2015 and any membership purchased under an added years contract, and any additional survivor's pension purchased under an ARC contract that included survivor's pension, as at the relevant 31st March (e.g. at 31 March 2016 for the 2015/16 Annual Benefits Statement). These should be based on the full-time equivalent (FTE) final pay figure supplied to the administering authority by the employer as at the relevant 31st March.

Notes:

- the Annual Benefit Statement should not assume any future pay inflation for any pre 1 April 2015 final salary benefits;
- if the statement assumes the member is married or in a civil partnership or cohabiting with an eligible cohabiting partner as at the relevant 31st March, the statement should include
 - o a statement to that effect,
 - o a caveat to say that whereas the survivor benefit payable to a surviving spouse or civil partner or eligible cohabiting partner is based on all the member's period of membership of the scheme, the survivor benefit payable to:
 - an eligible cohabiting partner of a post leaving partnership will not include any pre 6 April 1988 membership (unless the member had elected prior to 1 April 2015 to pay for some or all of that membership to count)
 - a widow of a post leaving marriage will not include any pre 6 April 1978 membership
 - a widower of a post leaving marriage, a survivor of a same sex post leaving marriage, or a civil partner of a post leaving civil partnership will not include any pre 6 April 1988 membership.
- a caveat should be added to say that any pre 1st April 2015 benefits include an actuarial increase for the period between member's

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In order to comply with regulation 62 of the LGPS (Administration) (Scotland) Regulations 2008 the

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must show the current value of the member's final salary benefits (pension and any 3/80ths lump sum) accrued at 31 March 2015 (payable from the member's Normal Pension Age under the 2009 Scheme) and the member's prospective survivor benefits based on membership accrued to 31 March 2015.

[Regulations 62(3)(a) and (5)(a) of the LGPS (Administration) (Scotland) Regulations 2008]

Note that if the statement assumes the member is married or in a civil partnership as at the 31 March 2015, the statement should include

a statement to that effect, a caveat to say that whereas the survivor benefit payable to a surviving spouse or civil partner is based on all the member's period of membership of the scheme, the survivor benefit payable to:

an eligible cohabiting partner will not include any pre 6 April 1988 membership (unless the member had elected to pay for some or all of that membership to count)

a widow of a post leaving marriage will not include any pre 6 April 1978 membership

a widower of a post leaving marriage, a survivor of a same sex post leaving marriage, or a civil partner of a post leaving civil partnership will not include any pre 6 April 1988 membership.

must show the pensionable pay figure upon which the member's benefits, and the prospective survivor benefits, shown in (i) have been calculated.

[Regulation 62(4)(a) of the LGPS (Administration) (Scotland) Regulations 2008]

should not include any projection of the member's or prospective survivor's benefits i.e. for prospective membership beyond 31 March 2015. There is, technically, one exception to this; namely that where a member is still in the process of purchasing added years or ARCs, the extra member's and prospective survivor's benefits (i.e. over and above those already included in (i) above) which would be due if the member completes the added years or ARC contract could be shown. However, providing a projection for just those benefits would be confusing for the member and so, for that reason, a projection should not be provided.

[This will not require an amendment to the LGPS (Administration) (Scotland) Regulations 2008 because regulation 62(3)(b) of those Regulations refers to the amount of final salary benefits capable of being accrued post 31 March 2015 and, apart from any added years that are still being purchased by a small number of members, there are no final salary benefits capable of being accrued after that date.]

should include an explanation of why there is no projection of the member's benefits for prospective membership beyond 31 March 2015 (as the benefits post 31 March 2015 will be CARE benefits and we don't know in advance what they might be – as they are based on pensionable pay in the new scheme).

must show the current value of death in service survivor benefits at 31 March 2015, including Tier 1 enhancement in accordance with regulation 24 of the LGPS (Benefits,

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Normal Pension Age under the 2009 Scheme and the member's Normal Pension Age under the 2015 Scheme but that this increase is based on current actuarial increase factors which might change in the future.

[Regulation 87 of the LGPS (Scotland) Regulations 2014, paragraph 2 of the Public Service Pensions (Information about Benefits) Directions 2014 and paragraph 2(a) of Part 1 of Schedule 5 to The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013]

- ii) must show the full-time equivalent (FTE) final pay figure upon which the member's final salary benefits and the prospective final salary survivor benefits shown in (i) have been calculated.

[Regulation 87 of the LGPS (Scotland) Regulations 2014, paragraph 2 of the Public Service Pensions (Information about Benefits) Directions 2014 and paragraph 3 of Part 1 of Schedule 5 to The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013]

- iii) must show the total accrued CARE pension (payable from the member's new Normal Pension Age under the 2015 Scheme) at the relevant 31st March and the member's prospective CARE survivor benefits based on membership accrued after 31 March 2015.

Notes:

- the CARE pension at the relevant 31st March must only include revaluation up to the previous 1st April in order that the amount shown on the Annual Benefit Statement reflects that shown on Annual Allowance Statements. Thus, the Annual Benefit Statement for 2015/16 would include no revaluation; the Annual Benefit Statement for 2016/17 would include the revaluation applied at 1 April 2016 to the pension accrued at 31 March 2016, etc.
- the CARE pension at the relevant 31st March should not include the amount of any underpin that would have been added into the CARE account if active membership had ceased at that 31st March (and this should also not be included in the Annual Allowance Statements). This is because, by virtue of regulation 4(1)(b) of the LGPS (Transitional Provisions and Savings) (Scotland) Regulations 2014, the underpin is only due when a member actually receives payment of their pension. At the relevant 31 March to which the Annual Benefit Statement relates the member is an active member and so no underpin amount would actually be payable on that date.
- the Annual Benefit Statement should show the amount of additional CARE pension accrued during the year to which the Statement relates and the amount of the CARE pension accrued up to the year prior to that (as revalued).

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[Regulation 87 of the LGPS (Scotland) Regulations 2014, paragraph 2 of the Public Service Pensions (Information about Benefits) Directions 2014 and paragraph 2(a) of Part 1 of Schedule 5 to The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013]

- iv) should show a projection of the member's and prospective survivor's CARE pension if the member remains an active member until the member's new Normal Pension Age under the 2015 Scheme and on the assumption that the member remains in the CARE section they are in on the relevant 31st March through to their new NPA and should include the value of any final salary benefits.

Notes:

- the projection should include a caveat to say that the CARE projection is based on the pensionable pay for the year to the relevant 31st March (i.e. upon which the current year's CARE accrual has been calculated), assumes the member's pay will remain constant to new NPA, does not assume any pay inflation or inflation under Treasury Revaluation Orders for future benefit accrual under the CARE scheme (i.e. the projection to the member's new NPA is shown in today's money terms) and, where applicable, assumes that payment of contributions under any current APC/SCAPC arrangement is completed. There should also be a caveat to explain that any benefits in respect of the pre 1 April 2015 Scheme are based on the final pay figure at the relevant 31st March, does not assume any future pay inflation (i.e. the benefits are shown in today's money terms) and, where applicable, assumes that payment of contributions under any current ARC or added years contract is completed. Debits for Pension Sharing Orders and Scheme Pays elections should be shown. If members want to project benefits, on-line modeller tools can be made available to enable them to do so.
- the projected CARE benefits should not include the amount of any underpin that would be added into the CARE account if active membership were to cease at the member's new NPA (but with the underpin amount calculated at the member's old NPA under the 2009 Scheme). This is because, by virtue of regulation 4(1)(b) of the LGPS (Transitional Provisions and Savings) (Scotland) Regulations 2014, the underpin is only due when a member actually receives payment of their pension. There is no guarantee that the member would actually retire, and thus be in receipt of pension, at the new NPA to which the projection on the Annual Benefit Statement has been made and so it cannot be known for certain that an underpin amount would actually be payable on that date.
- if the member is in the 50/50 section at the relevant 31st March there is no legal requirement to also provide a projection of the CARE benefits that could be achieved if the member had moved to the main section from the immediately following 1st April (i.e. from the day following the 31st March to which the Annual Benefit Statement relates).

[Regulation 87 of the LGPS (Scotland) Regulations 2014, paragraph 2 of the Public Service Pensions (Information about Benefits) Directions 2014 and paragraph 2(b) of Part 1 of Schedule 5 to The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013]

- v) must show the pensionable pay figure upon which the amount of additional CARE pension accrued during the year to which the Statement relates has been calculated (see the third note in (iii) above) and upon which the projection of the member's and prospective survivor's CARE pension under (iv) above has been calculated.

[Regulation 87 of the LGPS (Scotland) Regulations 2014, paragraph 2 of the Public Service Pensions (Information about Benefits) Directions 2014 and paragraph 3 of Part 1 of Schedule 5 to The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013]

- vi) must show the current value of death in service survivor benefits accrued at the 31st March to which the Annual Benefit Statement relates together with the death in service lump sum at that 31st March, and how they are calculated.

Notes:

- the survivor benefits will be calculated based on the final salary survivor benefits accrued to 31 March 2015 (if any), and from any added years being purchased by the member and from any ARC contract that includes a survivor's pension, plus the survivor benefits due under the CARE scheme (including the CARE enhancement based on Assumed Pensionable Pay (APP) x 1/49th x service from 1st April to the member's new Normal Pension Age under the 2015 Scheme and survivor benefits in respect of any APC contract for lost pension). Note that survivor benefits are affected by any pension Sharing Order (but not children's pensions).
- the death in service lump sum should be shown as 3 x APP but there should be a caveat added to the Annual Benefit Statement to say that if the member also has, from membership of an LGPS Fund in Scotland, a deferred pension or a pension in payment, the lump sum death grant that would be payable from the Scheme if the member dies in service is the greater of the death in service lump sum shown on the Annual Benefit Statement or the aggregate of the lump sum death grant due from those earlier benefits. In such a case, if the death in service lump sum is the greater, no lump sum death grant will be payable from the Scheme in respect of those earlier benefits; conversely, if the aggregate lump sum death grants from those earlier benefits is greater, no death in service lump sum will be due from the current period of membership.
- although both of the previous paragraphs refer to APP (being, other than for returning officers) the pensionable pay for the 3 months prior

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to the relevant 31st March, or 12 weeks in the case of a member whose pay frequency is not monthly) it is highly unlikely that employers will supply this figure. At a practical level, therefore, it is anticipated that the notional APP figure to be used will be the pensionable pay figure used to calculate the amount of additional CARE pension accrued during the year to which the Statement relates

- as the statement will have to assume, for a survivor benefit, that the member is married or in a civil partnership or cohabiting with an eligible cohabiting partner as at the relevant 31st March, the statement should include a statement to that effect.

[Regulation 87 of the LGPS (Scotland) Regulations 2014, paragraph 2 of the Public Service Pensions (Information about Benefits) Directions 2014 and paragraph 1 of Part 1 of Schedule 5 to The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013]

- vii) must show the date on which the member's pensionable service started in that employment.

[Regulation 87 of the LGPS (Scotland) Regulations 2014, paragraph 2 of the Public Service Pensions (Information about Benefits) Directions 2014 and paragraph 4 of Part 2 of Schedule 5 to The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013]

- viii) must show a summary of the method for calculating the member's benefits and any survivors' benefits.

[Regulation 87 of the LGPS (Scotland) Regulations 2014, paragraph 2 of the Public Service Pensions (Information about Benefits) Directions 2014 and paragraph 5 of Part 2 of Schedule 5 to The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013]

- ix) must show how any deduction from benefits is calculated.

Notes:

- with regard to pension sharing debits it is assumed that these should be shown based on the assumption that the member will draw their pension at Normal Pension Age. There would need to be an explanation added that if the member draws their benefits before their Normal Pension Age or their Critical Retirement Age, if earlier, the debit will be less than shown (because the monies to be recovered by the Fund to pay for the Pension Credit would be recovered over a longer period than had been assumed when preparing the Annual Benefit Statement); and if the member draws their benefits after their Normal Pension Age, the debit will be greater than shown (because the monies to be recovered by the

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Fund to pay for the Pension Credit would be recovered over a shorter period than had been assumed when preparing the Annual Benefit Statement).

- with regard to annual allowance scheme pays debits it is assumed that these should be shown based on the assumption that the member will draw their pension at Normal Pension Age. There would need to be an explanation added that if the member draws their benefits before their Normal Pension Age the debit will be less than shown (because the monies to be recovered by the Fund to pay for the scheme pays tax payment would be recovered over a longer period than had been assumed when preparing the Annual Benefit Statement); and if the member draws their benefits after their Normal Pension Age the debit will be greater than shown (because the monies to be recovered by the Fund to pay for the scheme pays tax payment would be recovered over a shorter period than had been assumed when preparing the Annual Benefit Statement).

[Regulation 87 of the LGPS (Scotland) Regulations 2014, paragraph 2 of the Public Service Pensions (Information about Benefits) Directions 2014 and paragraph 6 of Part 2 of Schedule 5 to The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013]

A general caveat should be added to the Annual Benefit Statement to say that the member's Normal Pension Age under the 2015 Scheme is currently [ddmmyyy] but that this may change in the future as and when the Government changes State Pension Ages.

It should be noted that by virtue of paragraph 2 of Part 1 of Schedule 5 to the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 [SI 2013/2734] it is only mandatory to provide the information in either of the following, but not both:

- a) items (i) and (iii) above, or
- b) item (iv) above.

However, administering authorities should continue with the now long-standing practice, as formerly required under regulation 62(3) of the LGPS (Administration) (Scotland) Regulations 2008, of providing the information set out in both items (i) and (iii) and item (iv) above (i.e. providing figures at 31st March and a projection to Normal Pension Age).

Annual benefit statements for deferred benefits

There are a number of complications that administering authorities need to be aware of in relation to Annual Benefit Statements issued to members with deferred benefits.

Firstly, it will not be possible to quote a specific NPA payable date on Annual Benefit Statements issued to members leaving with deferred benefits post 31 March 2015. Such statements will have to state that the normal payable age

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for the post 31 March 2015 benefits will be whatever the member's State Pension Age is at the time they draw their benefits (with a minimum of age 65), that the member's normal pension age is currently [ddmmyyyy] and that this may change in the future as and when the Government changes State Pension Ages.

Secondly, any death grant shown should include a caveat to the effect that if the member is back in active membership of the LGPS in Scotland at the date of death, the death grant payable would be the greater of 5 times the deferred pension or 3 times their pay (Assumed Pensionable Pay) in the new job.

Lastly, the Annual Benefit Statement should contain a statement to the effect that if the deferred member re-joins, or has re-joined, the LGPS in another Fund in Scotland they must, (if they have not already done so):

- a) notify the administering authority of the Fund in which they are an active member that they have a deferred benefit in another LGPS Fund in Scotland,
- b) notify the Fund in which the deferred benefit is held that they are an active member in another LGPS Fund in Scotland, and
- c) notify the administering authority of the Fund in which they are an active member of any intervening service in any other public service pension scheme (even if a refund of contributions has been received in respect of that service).

It should be pointed out items (a) and (b) are required to ensure the member is given the appropriate options regarding aggregation of their benefits and that failure to comply with item (c) could lead to certain statutory rights that may apply to the member (e.g. to a final salary link if the member aggregates any pre 1 April 2015 membership from the LGPS in Scotland) not being applied.

Statutory Money Purchase Illustrations for AVCs/SCAVCs

Statutory Money Purchase Illustrations have to be produced for AVCs. The LGPS (Scotland) Regulations 2014 make it clear that, for AVC arrangements entered into after 31 March 2015, if the member has not provided an acceptable date to be used for the SMPI benefit projection, the projection should be to a date chosen by the administering authority. This should be the member's NPA or, if the member has already passed their NPA, to age 75.

Best Practice

The LGPC Secretariat endorses best practice in terms of communication of information to scheme members. Information on good communication practice is available from various sources including the LGPC (see <http://www.local.gov.uk/web/lgaworkforcepensions/effective-communications>) and the PQM Guide to good communication (see http://www.pensionqualitymark.org.uk/documents/48562%20PQM%20guide%20to%20good%20comms_single_LR%20FINAL.pdf).

The Public Service Pensions (Information about Benefits) Directions 2014

The Treasury, in exercise of the powers conferred by section 14(2), (3) and (6) of the Public Service Pensions Act 2013(a), make the following Directions.

Citation, commencement and interpretation

1.—(1) These Directions may be cited as the Public Service Pensions (Information about Benefits) Directions 2014, and come into force on 1st April 2015.

(2) In these Directions:

“benefit information statement”, in relation to a scheme under section 1 of the Act or a new public body pension scheme, means a statement issued in accordance with the provisions of section 14 of the Act;

“the Act” means the Public Service Pensions Act 2013; and

any term in these Directions that is defined in the Act has the same meaning as in the Act.

Information to be included in benefit information statements

2. A benefit information statement provided by the scheme manager for a scheme under section 1 of the Act or a new public body pension scheme to a person in pensionable service under such a scheme must include the information listed in Parts 1 and 2 of Schedule 5 (statement of benefits: non money purchase benefits) to the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013(b) in relation to pensionable service—

(a) under the scheme, and

(b) under any statutory pension scheme that is connected to it.

Manner of provision of benefit information statements

3. The manner in which a benefit information statement is provided may include any of the following—

(a) by hand;

(b) by sending it to the person’s last known postal address;

(c) subject to the requirements in directions 4 to 6, by sending it to the person’s last known electronic address;

(d) subject to the requirements in directions 4, 5 and 7, by making it available on a website.

4. Where a benefit information statement is provided by being sent to a person’s electronic address or made available on a website, the scheme manager must on request from the person concerned provide a copy of the statement to the person free of charge in a paper copy or a similar form capable of being read.

(a) 2013 c.25.

(b) S.I. 2013 /2734.

5. A benefit information statement may only be provided by being sent to a person's electronic address or being made available on a website if the scheme manager is satisfied that the statement is provided in a manner—

- (a) designed so that the person will be able to get access to, and store or print, the statement; and
- (b) that takes into account the requirements of disabled persons.

6. Where a person's electronic address is used for the first time to provide a benefit information statement to a person, the following information must first have been given to the person by hand or sent to the person's last known postal address—

- (a) the manner in which the statement is to be provided; and
- (b) an explanation of how to get access to and read the statement,

and each subsequent time an electronic address is used to provide a benefit information statement to the person, the information mentioned in paragraphs (a) and (b) must first have been given in such a manner as the scheme manager considers will bring that information to the person's attention.

7. Where a website is used for the first time to provide a benefit information statement to a person, the following information must first have been given to the person by hand or sent to the person's last known postal or electronic address—

- (a) the manner in which the statement is to be provided; and
- (b) an explanation of how to get access to and read the statement,

and each subsequent time a website is used to provide a benefit information statement to the person, the information mentioned in paragraphs (a) and (b) must first have been given in such a manner, including by sending it to the person's last known electronic address, as the scheme manager considers will bring that information to the person's attention.

8. A benefit information statement may be provided by the scheme manager in accordance with these Directions either directly or indirectly, through a third party.

11 March 2014

Julian Kelly
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For H.M. Treasury