

Communications Working Group

AGREEMENTS AND ACTIONS

Tuesday 15 October 2019 11am to 2pm

Location: Eaton-Cockell Room, 18 Smith Square

1. Apologies and introductions

Present

Alastair Johnston (**AJ**) (Durham Pension Fund)
Amanda Jupp (**AJu**) (Surrey Pension Fund)
Andy Hemming (**AH**) (West Midlands Pension Fund)
Becky O'Shea (**BO'S**) (Oxfordshire Pension Fund)
Ben Altoft (**BA**) (Avon Pension Fund)
Cheryl Platts (**CP**) (Buckinghamshire Pension Fund)
Guy Hayton (**GH**) (Merseyside Pension Fund)
Jacinta Wilmot (**JW**) (Environment Agency)
Jenny Gregory (**JG**) (East Riding Pension Fund)
Karen Brooker (**KB**) (Kent Pension Fund)
Kath Meacock (**KM**) (Flintshire Pension Fund)
Lorraine Bennett (**LB**) (LGPC Secretariat)
Mandy Judd (**MJ**) (Hampshire Pension Fund)
Martin Griffiths - **Chair** (Staffordshire Pension Fund)
Matthew Allen - vice-chair (**MA**) (Cornwall Pension Fund)
Rachel Abbey (**RA**) (LGPC Secretariat)
Rebecca Clough (**RC**) (Shropshire Pension Fund)
Sharon Grimshaw (**SG**) (LGSS)
Sinead Nicholson (**SN**) (NILGOSC)
Steve Makin (**SM**) (Avon Pension Fund)
Stuart Duncombe (**SD**) (West Yorkshire Pension Fund)

Dialled in: Mathew James (**MJa**) (Dyfed Pension Fund)
Gareth Hall (**GHa**) (Gwent (Torfaen) Pension Fund)
Pamela Bruce (**PB**) (Lothian Pension Fund)

Apologies

Andy Brooks (**AB**) (Gwent (Torfaen) Pension Fund)

Video sub-group: Andy Hemming, Cheryl Platts, Becky Clough, Steve Jones

ABS sub-group: Andy Hemming, Cheryl Platts, Becky Clough, Martin Griffiths, Stuart Duncombe

Retirement booklet subgroup: Andy Hemming, Jenny Wylie, Jacinta Wilmot, Karen Brooker, Gareth Hall, Mandy Judd, Steve Makin.

Digital engagement subgroup: Jenny Gregory, Cheryl Platts, Becky O'Shea, Becky Clough, Kath Meacock

The group introduced themselves for the benefit of new members.

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2. Actions and agreements from last meeting held 11 July 2019

The group reviewed the minutes from the last meeting. Most action points are covered in later items on the agenda.

Action 1: The next Heywood User Group meeting is in November. RC has contacted Heywood who have confirmed that a project is underway to ensure that their member self-service portal is compliant with accessibility legislation.

Action 11: Partial flexible retirement was raised with Heywood at the CLASS Joint Pensions Group meeting in September. The issue will be discussed further at the autumn round of Heywood User Groups. The group noted that the new 'AHA' system can be used to raise development issues with Heywood. The level of interest in a topic or problem will influence development priorities. Civica users believe their system can process partial flexible retirements, but none had tested this. Most funds are not publicising partial flexible retirement and are doing manual calculations when needed.

3. Member website

- **Videos project update**

The aim of the videos is to encourage member engagement and to direct them to where they can find further information, not to provide in-depth information about the Scheme rules. The first five videos will each be around 90 seconds long.

LB, RA and the subgroup have finalised the scripts for all seven member videos. Gwynedd Pension Fund have translated the scripts into Welsh. Voice-overs for all the videos have been recorded in English and Welsh. The voice-over artist used was fluent in Welsh and English to ensure the quality of the Welsh version.

Action 1: LB to send Welsh voice-over recordings to Gwynedd to review.

LB played the first two videos for the group. The first includes the voice-over and music, but still needs sound effects and final 'polishing' of animation. The second is at an earlier stage and does not have music. Landscape have not yet completed the longer Annual Allowance and Lifetime allowance videos. All seven videos should be completed by the end of October.

Action 2: LB to share links to five videos produced so far with the group

The Chair and the group liked the fresh feel of the videos and wanted to pass on their thanks to Leah at Shropshire for her work in early stages of the project. RC suggested that the videos could be used to introduce a subject at member presentations. CP intends to add the Annual Allowance video to the relevant section of the pension fund website.

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SN and PB noted that much of the content is generic and with minimal changes versions of the videos could be produced for LGPS Scotland and Northern Ireland.

Next steps: All on-screen words must be translated for the Welsh version which Landscape will produce after the English versions have been signed off.

Landscape are looking at hosting options and captions. Ideally, we want members to access the videos through the LGPS member website so that traffic can be monitored. It was suggested that coding could be used to direct a member back to their pension fund website after watching a video.

Administering authorities need to consider how they will promote the videos to members and employers.

- **Member website refresh**

LB announced LGA's intention to refresh the member website www.lgpsmember.org by:

- removing avatars which now look dated
- adding bullet point links to the home page
- allowing members to reach their 'destination' page without having to visit intermediate menu pages (those intermediate pages could be retained in case any funds have links to them on their websites or in member documents)
- in the longer term, reviewing and updating the text in line with plain English guidelines.

- **LGPS logo**

LB proposed introducing a new LGPS logo. The current logo is starting to look dated, the fact that it is in lower case is unusual, the text above the main logo is too small and the oval looks odd now it no longer contains '2014'.

The group agreed that the logo is looking dated, particularly in comparison with the style of the videos. CP pointed out that the current logo is familiar to members and is used in many fund documents; to switch to a new logo would be a large amount of work. The group agreed that consistency was important, but that not all funds use the logo in their documents. A new logo would provide an opportunity to encourage all funds to adopt that new logo and include it in new and existing documents.

- **Web content accessibility guidance update from group members**

KB – Kent County Council taking the lead and reviewing council and pension fund websites.

SN and GH – external company (Shaw Trust) has audited their public facing websites. Their audit considers a wide range of accessibility issues, including whether a site can be navigated using head controls, if text size can be increased and whether the site is compatible with screen readers. SN is expecting an accessibility report imminently for the NILGOSC

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member website, and including Shaw Trust's recommendations for improvement.

Action 4: SN to share the report with the group.

Any areas of a website which are not accessible should be listed in an Accessibility statement, which should also include who to contact if a viewer wants to request information in a different format.

The group's view is that PDFs can be used to provide supplementary information. They should be saved in PDF/A format to ensure accessibility. The Accessibility statement should say what is provided in PDF form, and what other formats are available.

Flowcharts with Yes / No options cannot be used because they can't be navigated by tab commands.

Other software is available as an alternative to using PDFs. BO'S noted that Oxfordshire use Microsoft Sway to produce newsletters. This software is available to anyone with a Microsoft account and the content can be navigated using a mouse. Flickbook and Pageturner were also mentioned, but we understand that Pageturner is not fully accessible.

The Gov.uk website includes some useful information on website accessibility including:

- [Understanding new accessibility requirements for public sector bodies](#)
- [Make your website accessible and publish an accessibility statement](#)
- [Sample accessible document policy](#)
- [Doing a basic accessibility check if you cannot do a detailed one](#)
- [Understanding WCAG 2.1](#)

4. GDPR - retention policies – feedback on templates

The LGA issued template data retention statements for administering authorities and employers in July 2019. Some members of the group have shared the employer template with their Scheme employers. The response so far has been limited. GH will ask for feedback at the next employer meeting and share the responses with the group.

Some funds confirmed that they would publish the template employer data retention policy, possibly on an employer area of their website.

GH stated that Merseyside Pension Fund intends to publish the administering authority data retention policy on their member website. However, they are likely to wait until their systems have been updated to automate the process to identify and delete records once a 'trigger' date has been reached.

MJa confirmed that Kevin Gerard, on behalf of the All Wales Pension Officer Group, has written to Heywood about a number of system issues, including the need for an automated solution to archive dormant records.

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LB noted that a possible remedy in response to the McCloud ruling may mean that funds need to collect part time hours history and service break information from April 2014 onwards for members in scope of that remedy. LB recommended early communications with employers to ensure that data remains available. If the remedy decision is made after 2020, there is a risk that some employers might otherwise dispose of data that is more than six years old.

5. Annual Benefit Statements - update on the ABS project looking at data items to be included

The Chair hosted a meeting on 11 October 2019 with RA and AH, colleagues from Staffordshire and West Midlands Pension Funds, Cheryl Morrell from Shropshire and the following representatives of the pensions administration software suppliers:

Dave Friend – Heywood
Emma Kingston – Civica
Roger Swift – Capita
Jon Slater – Equiniti

Notes from that meeting:

The possibility of tailored statements was discussed – providing different information to different member ‘types’. Although this may be ideal for members, many funds do not have the resources or technical expertise to produce multiple statements and so it is likely that they will continue to use a single statement template for all members.

There was agreement on most issues:

- Capita and Equiniti to take forward the SAB recommendation that a late payment increase is included in final salary benefits of a member under their NPA on 31 March
- Continue to provide a projection of benefits to NPA (with a blank section or figures at 31 March repeated for a member over NPA on 31 March)
- Both 31 March figures and projection to NPA should be the figures after any divorce or Annual Allowance scheme pays debit has been deducted
- Maximum commutation figures at 31 March should be based on the pension and lump sum figures after the deduction of a divorce or AA scheme pays debit.

There was no agreement on the inclusion in the statement of reduced figures at 31 March for those members between age 55 and NPA on that date. Civica believes that this is already offered to their clients, but need to check if this is part of the ‘standard’ package, or a chargeable extra. Heywood pointed out that there would be significant development costs associated with this change. The change would need to be made for LGPS Scotland and Northern Ireland as well as for England and Wales. Heywood will consult with the CLASS Group to gauge the level of demand for this development.

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CWG meeting:

The Chair and RA updated the group on the discussions at the meeting with software suppliers. PB noted that she expected to be able to include reduced figures for active members of LGPS Scotland who are over age 55 on 31 March. The group understands that statements for active Firefighters and Police officers include the benefits after a reduction for a divorce or AA scheme pays debit. MJa confirmed that Welsh funds were not likely to include reduced figures in statements for active members, but were not opposed in principle to the inclusion of reduced figures in the data extract.

Heywood's 'AHA' system can be used to register this idea for development, giving all Heywood clients the opportunity to add their voice in support of the change.

The group considered the inclusion of reduced figures in annual statements for deferred members. The change for active members was considered a priority and the group decided not to recommend any development for deferred members at this time.

Action 5: RA to make final changes to the ABS technical guide

6. Retirement planning booklet - feedback on final version

LB shared the latest version of this document with the group in advance of the meeting. The group was very positive about the guide and most plan to make it available to members and employers. GH and the Chair thanked the subgroup for producing the guide, with particular credit to AH for leading the project.

The group raised a few suggestions for changes:

- removing the sections on how benefits are calculated and how to increase your pension
- add a section on the IDR process at the end
- expand the disclaimer to mention pension tax
- add a line about recycling tax-free lump sum.

Publishing a Word version of the guide allows funds to choose which sections they want to include in their fund-specific version of the guide.

Action 6: LB and RA to review suggestions and make final changes to the wording of the guide.

GH raised a concern about the number of images included in the guide, and whether they are all free from copyright. If one fund has the right to use an image, that does not mean that all funds have the same right.

Action 7: LB and RA to liaise with AH to check if the images are free from copyright, and whether they can be used by all funds.

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It was noted that the style of the guide is different from the recently published AVC guide for members. The font used in the Retirement guide is Arial 12, which is the LGA 'house' standard and is compliant with Government recommendations.

Action 8: RA to produce a Word version of the member AVC guide using the same font.

7. Salary Sacrifice SCAVCs

CP asked whether the group should produce guides on salary sacrifice SCAVCs for administrators and members. There were concerns that members do not understand the impact that salary sacrifice could have on redundancy and other statutory payments.

The group decided that the introduction of a salary sacrifice AVC is an employer decision and the issues that arise are employment issues. The group did not want to add information about salary sacrifice AVCs to the current AVC guide because relatively few employers have set up this type of arrangement.

JG confirmed that there was a small amount of work for administering authorities when the salary sacrifice arrangement was first set up. The responsibility for communicating with members and answering queries about the salary sacrifice scheme rests firmly with the employer and not the administering authority.

8. Regional communication groups

RC provided an update from the regional group:

- a small number of funds were late issuing active and deferred benefits statements due to software issues
- one fund must report a data breach associated with using an external supplier to print member statements.
- some members of the group will be attending Plain English workshops in November
- work has started on newsletters for active, deferred and pensioner members
- the group will be working together to share their experience of encouraging members to sign-up to a member portal.

9. Communications work plan

- **Progress review**

LB reviewed the workplan for 2019/20 and concluded that the group was on target.

- **Items for next year's plan**

LB asked the group for suggestions for topics to add to the 2020/21 workplan, or for any projects that the group could work on in the current year.

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Employer videos - Karl White, Trainer for the LGA is working with Civica who will produce the videos for free. The videos will be available for all administering authorities, not just Civica clients.

Digital engagement – JG asked whether the group could share their experience of encouraging members to sign up for an online portal. The group felt there was scope to share best practice, provide case studies of successful (and unsuccessful) programmes.

Action 9: JG to collate the information provided by the group. CP, RC, BO'S and KM agreed to contribute. RC to relay output from the regional group's work in this area to JG.

Accessibility guide – CP and RC suggested some form of accessibility crib-sheet for administering authorities to refer to. This would allow funds to make some progress on improving the accessibility of their websites before undertaking a full accessibility audit.

Action 10: LB and RA to look into producing a crib sheet.

McCloud - We do not know what form any remedy will take, who will be in scope or when the remedy will be announced. The group decided that there was no benefit in informing members until we have more concrete information to pass on.

GMP – BC asked whether there was any appetite for producing a member guide to pension increases.

10. AOB

- With regard to the **provision of AVC data under FoC**, do other Funds send the 'Pensions Wise - It's time to choose booklet' and 'TPR Scams factsheet' in hard copy or simply rely on the web link within the body of the guidance?
We send in hard copy, as we're conscious that only providing a web link might not stand up if any case went to appeal. (Mathew James – Dyfed)
Proposed change in Wales to send hard copy in case any complaint goes to appeal. What are others doing?

Members of the group are either sending a hard copy only or both a hard copy and links to the factsheets. Funds are also asking members to sign a declaration confirming that they have read the warning leaflets before a transfer can be completed.
- **Joint newsletters** (Sharon Grimshaw – Northamptonshire)
Worcestershire plan to write to pensioners as soon as CPI figure is announced. They are happy to work with anyone else who is planning to issue pensioner communications this month.

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The group was more interested in working together on a pensioner newsletter to be issued in March/April to coincide with issuing P60s. The regional communications group will share their work with the group. All articles will be checked for plain English.

- **Is anyone using the Gov.uk – Notify, free text and email services?** (Ben Altoft – Avon)

Some funds are using Gov.uk to send bulk emails and texts to members. The service is free but there are limitations. It is not possible to embed URLs into messages using this system. A single logo can be added.

Gov.delivery is more user friendly and has increased reporting functionality but is not free.

Heywood email facility has only limited uses. It is not easy to target a specific group of members - eg only those registered for MSS. Internal systems may prevent bulk emails from sending if too many are sent at once.

SN – NILGOSC uses a provider which costs 1p per email. They have much improved reporting capabilities.

Mail Chimp is hosted in the USA. If funds are using this company, then they will need to note this in their privacy notice.

There is no link to the pension database when an email is sent from an external system. Pension administrators must manually remove email addresses from the pension database if any emails are returned as 'undeliverable'.

- **What P60 template is generally sent to pensioners?**

Funds can use the template for employees which includes some fields which will be blank for pensioners. Alternatively, funds can produce a bespoke template which must be approved by HMRC annually. HMRC do provide a [basic template](#) which can be used for pensioners, but you must ask HMRC to approve your substitute P60, even if it is based on this template.

Kent, Hampshire and NILGOSC all produce a bespoke P60 which they send to HMRC for approval every year.

11. Next Meetings

Wednesday 29 January 2020

Wednesday 29 April 2020.