

Communications Working Group
AGREEMENTS AND ACTIONS
Tuesday 29 Sept 2020 11am - MS Teams meeting

1. Apologies and introductions

Present

Alastair Johnston (**AJo**) Durham Pension Fund
Amanda Jupp (**AJu**) Surrey Pension Fund
Becky Clough (**BC**) Shropshire Pension Fund
Cory Blose (**CB**) LGSS
Guy Hayton (**GH**) Merseyside Pension Fund
Jacinta Wilmot (**JW**) Environment Agency
Jenny Gregory (**JG**) East Riding Pension Fund
Karen Brooker (**KB**) Kent Pension Fund
Karen Thomas (**KT**) Gwent (Torfaen) Pension Fund
Kath Meacock (**KM**) Flintshire Pension Fund
Lindsey Davison (**LD**) Tyne and Wear Pension Fund
Lorraine Bennett (**LB**) LGPC Secretariat
Mandy Judd (**MJ**) Hampshire Pension Fund
Martin Griffiths (**Chair**) Staffordshire Pension Fund
Matthew Allen (**vice-chair**) Cornwall Pension Fund
Mathew James (**MJa**) Dyfed Pension Fund
Pamela Bruce (**PB**) Lothian Pension Fund
Rachel Abbey (**RA**) LGPC Secretariat
Rebecca O'Shea (**RO**) Oxfordshire Pension Fund
Stuart Duncombe (**SD**) West Yorkshire Pension Fund
Zena Kee (**ZK**) NILGOSC

Apologies

Ben Altoft (**BA**) Avon Pension Fund
Sharon Grimshaw (**SG**) LGSS
Sinead Nicholson (**SN**) NILGOSC

Non attendees

Andy Hemming (**AH**) West Midlands Pension Fund

Digital engagement subgroup: Jenny Gregory, Becky O'Shea, Kath Meacock.

Transfer video subgroup: Andy Hemming, Jacinta Wilmot, Sharon Grimshaw, Rebecca Clough, Leah Swane.

Letter templates subgroup: Stuart Duncombe, Sharon Grimshaw, Ben Altoft, Karen Thomas.

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.

Exit payment reform employer subgroup: Matthew Allen, Guy Hayton, Jenny Gregory, Stuart Duncombe and Rebecca Clough.

Exit payment reform member subgroup: Martin Griffiths, Amanda Judd, Rebeca O'Shea (or Jenny Wylie), Jacinta Wilmot and Steve Jones.

2. Actions and agreements from last meeting held 28 May 2020

Actions carried forwards:

Action 1: LGA to investigate adding an area to the password protected 'Your LGPS Contacts' site that will allow funds to:

- confirm the secure email address that they want correspondence about interfunds to be sent to, and
- download a list of those contacts for all funds.

Action 2: The group to share their aggregation template letters with rachel.abbey@local.gov.uk if they have amended the LGA template letters.

Action 3: LGA to review the template summary for the transferring out video produced by the subgroup.

3. COVID-19

Furloughed staff

KB asked what information funds were requesting from employers in respect of staff who have been furloughed. She suggested that an indicator might be included in the end of year return for 2020/21 and wanted views on whether any additional information would be needed. BC confirmed that Shropshire

are asking employers whether any scheme members had been furloughed. If any have, then they will issue a spreadsheet to gather full information.

Incoming post

Funds are looking at solutions to deal with incoming post including:

- Staff going into the office to deal with incoming post. Original certificates and cheques are problematic.
- Other council teams opening, scanning and indexing post
- Making use of member portals to allow members to upload completed forms
- Switching to digital versions of forms instead of paper
- Looking for a third party to open, scan and index post off-site, a different division of Civica offers this service.

Outgoing post

Current process, problems and possible future development include:

- Sending forms for members to complete by email can be problematic if the recipient does not have a printer
- Using or considering an external provider to send outgoing post. Funds have used or considered the print solutions offered by Adair, Docmail and Civica.

Move to digital

Many funds agreed that the current situation has accelerated their move to online solutions to replace paper. SD confirmed that West Yorkshire is now delivering employer training online.

Working arrangements

Offices have been arranged to allow social distancing and remain open to allow staff in to deal with post and for other operational reasons. Many councils are rationalising their estates with the intention of moving to increased home working beyond the current crisis. Cornwall Council has designated the Pensions team as an essential service, meaning that office space for the team will be retained.

APC application form

The group requested that the APC application form is amended to allow it to be signed using DocuSign.

Action 4: LGA to look into changing the APC application form to allow it to be completed electronically.

4. Member website

[The Public Sector Bodies \(Websites and Mobile Applications\) \(No. 2\) Accessibility Regulations](#) mean that existing public sector websites must meet certain accessibility criteria from 23 September 2020.

The LGA pensions team has used Webaim to assess the member website www.lgpsmember.org and published an accessibility statement on the site. LB and RA have attended training on making websites and pdfs accessible. There is an inherent problem with the structure of the member site and our plan is a complete re-design and new branding. A formal procurement process will start in the coming weeks. Our web developer will assess www.lgpsregs.org and report on the changes that are required to meet the accessibility regulations. There is an ongoing project to review the pdfs that have already been published.

The group planned different approaches in relation to existing pdfs, including:

- Converting all existing pdfs to web content
- As above, but also including a pdf as a printable and 'searchable' version
- Converting only live documents such as policy documents from pdfs to a more accessible format
- Keeping some documents as pdfs as they should be 'searchable', such as brief scheme guide
- Linking to third party sites eg GAD guidance rather than publishing pdfs on the fund's website
- Funds that upload annual benefit statements as a pdf are looking for other options for 2021.

ZK encouraged the group to review the [NILGOSC accessibility statement](#) that they have produced following an audit by the Shaw Trust.

Funds reported problems with the member portal. Heywood claims that MSS is compliant with the regulations, but we understand that this is only the case for the 'out of the box' version. Once any local changes are made the responsibility for compliance passes to the fund. One fund reported that they

had identified accessibility problems with the sign-up page that had not been locally adapted.

5. Digital engagement

JG confirmed that the questionnaire was finished and had been reviewed by the subgroup. The aim of the questionnaire is to share best practice and find out more about successful initiatives to encourage members to sign up to an online portal. JG conformed that East Riding had a system that could be used to gather and collate responses. The Chair thanked the subgroups for their efforts.

Action 5: LGA to send the questionnaire to a selection of group members for review, including both Civica and Heywood clients.

6. Exit payment reforms

Update on the latest position

The LGA delivered a webinar on the impact of [exit payment reforms for local authorities](#) on 23 September.

HM Treasury regulations will introduce a cap of £95,000 on exits from employers in scope of the regulations. Strain cost will be included as part of that cost. MHCLG is currently consulting on changes to the LGPS regulations and compensation regulations that will implement the cap and wider exit payment reforms that were originally consulted on in 2016.

HMT regulations are likely to be in force before the end of the year, and before changes to the LGPS regulations are made. This means that there will be a period when there is a conflict between the HMT rules and the LGPS regulations. The LGA is pushing Government for answers on the legal position, specifically whether members will retain the right to an unreduced pension on redundancy over age 55.

Once the LGPS regulations are amended to incorporate the cap, we expect:

- The introduction of partial reductions for capped exits
- Member option to pay extra to 'buy out' some or all of the reduction if they are capped
- Member option **not** to take benefits on redundancy after age 55
- Standardised strain costs to be used across England and Wales for all exits in scope of the cap

- Strain cost will not necessarily reflect the true cost of an exit based on current local actuarial assumptions. Any under or overpayment may affect employer contribution rate set at the following valuation.

The wider reforms will impact the exit payments that can be made to members even where the cost does not exceed the £95,000 cap:

- Limits on weeks per year, total weeks and maximum pay that can be used to calculate a discretionary severance payment
- If a strain cost is payable, the member will not be entitled to discretionary compensation
- Strain cost will be reduced by Statutory Redundancy Pay (SRP) – member choice of reduced benefits plus SRP or to give up SRP in exchange for unreduced benefits

MHCLG is looking at which employers will be covered by the regulations. Different employers may be covered by the exit payment cap or the wider exit payment reform, both or neither. This will lead to increased complexity in administration.

KM asked whether the cap will apply differently to Welsh employers. LB confirmed our current understanding is that the exit payment cap will apply in Wales, but that the process to waive the cap will be simpler than it is in England.

Employer and member communications

Members of the group reported the actions they have taken or are aware of in connection with the exit payment reforms:

- Initial communication with employers – recognising that employers have a responsibility to review and amend their internal policies, this is not solely a pension fund responsibility
- Stopped providing estimates that involve a strain cost to employers, or to provide them with heavy caveats
- Stopped the member and employer portal from producing estimates that would result in a strain cost
- Employers sending information to scheme members which has led to increased queries to the pensions team.

The group acknowledged that there was a lack of understanding among employers and scheme members. They recognised the challenging timescales and agreed on the need for targeted communications. GH

mentioned that it would be helpful if the Secretariat could include an article in the next bulletin explaining why it is not possible to provide more detail/worked examples on the impact of £95k cap and further reform until further clarification is received from Government.

The Chair asked for volunteers for two subgroups to work on employer and member communications. CB offered to share the communications that they have already planned to produce with the group.

Employer subgroup:

Matthew Allen
Guy Hayton
Jenny Gregory
Stuart Duncombe
Rebecca Clough

Member subgroup:

Martin Griffiths
Amanda Judd
Rebecca O'Shea (or Jenny Wylie)
Jacinta Wilmot
Steve Jones

Action 6: LB to forward draft GAD guidance on standardised strain costs to the group. **Post meeting update: guidance uploaded to the scheme consultations page of www.lgpsregs.org**

Action 7: Subgroups to work with the Secretariat on employer and member communication when further clarification is provided by Government.

Action 8: LB to include an article in the next bulletin about exit payment reform communications. **Post meeting update: article included in September bulletin**

7. McCloud remedy

Update on the latest position

The [MHCLG consultation on amendments to the statutory underpin](#) closes on 8 October. You can read the [draft SAB response to the consultation](#) on the board's website.

The LGA and MHCLG has met with software suppliers with the aim of reaching agreement on the meaning of the regulations and how they should be implemented. Further discussions will be held once the MHCLG consultation closes. Software suppliers will not be able to introduce the changes needed to implement the exit payment cap due to the lack of complete information and short timescales.

Feedback on data collection

Most funds have told employers to expect a request for historic data but have not yet sent a request. Some are waiting to see what solution their supplier provides for uploading the data before making the request.

Many funds have reported that availability of data is their biggest concern. LB confirmed that the SAB policy group will be making recommendations in respect of employer data that is not available.

Some funds have continued to collect service data since 2014 and are able to take a different approach, such as:

- Analysing what data they have, identifying gaps and requesting only the missing data
- Sending a compliance statement or survey asking employers to confirm that they have continued to supply full service information. Issuing the data collection template to those that have not, or using sampling to check the accuracy of data supplied by those who claim to have sent full information
- Undertaking a data verification exercise rather than data collection. Send the employer the hours and service break data currently held and ask them to check and inform the pension fund of any corrections.

ZK reported problems getting any information from short-staffed employers at the moment, and predicted problems with the collection of historical data.

The Chair asked for more volunteers for the McCloud subgroup

McCloud subgroup:

Martin Griffiths

Matthew Allen

Kath Meacock

Lindsey Davison (new volunteer)

Amanda Jupp (new volunteer)

Action 9: KT to share with group the method Torfaen used to analyse their data.

Action 10: Any other volunteers for the subgroup should contact Lorraine.bennett@local.gov.uk.

8. Regional communications groups

Joint communications group – chaired by Shropshire

The last meeting concentrated on the annual benefit statement (ABS) project. Ten funds collaborated to produce a joint newsletter which was vetted by the Plain English Campaign and agreed by each fund for technical accuracy. The group also discussed McCloud and website accessibility.

The next meeting is later this week when they will start discussions on the changes needed for the ABS project next year to improve accessibility.

Welsh regional group

The Welsh group last met in March and will next meet in October. They successfully collaborated to produce 2020 ABSs.

On the agenda for the next meeting are the exit payment reforms, McCloud and data collection, website accessibility and suppliers who can help in auditing current websites. They are considering re-writing leaflets and making them available in Word instead of pdf.

9. Communications work plan

LB updated on the current workplan:

- March target date for aggregation and transfer out correspondence. LB reminded the group to share any example letters with rachel.abbey@local.gov.uk
- The member website and transfer video are in progress
- LB will update exit payment reform and McCloud to reflect the latest information
- *Cost cap – not sure about this one! HMT directions expected 2021*
- Ill health guide for employers – timing has slipped due to other urgent priorities

Action 11: CB to share suite of employer ill health guides with LB.

Action 12: LB to update the work plan with the latest information.

10. AOB

Member guides

RO asked how funds currently use the member guides, what format they use and whether they plan changes in response to accessibility rules?

The group uses the guides in various ways:

- Chopping the full guide up into separate smaller guides on specific topics
- Employers send link to brief guide to all new joiners to ensure new members are aware of the time limits related to transfers in and opting out
- Using the full guide as a resource for administrators rather than for scheme members. It is also used to find wording to respond to queries and complaints and for training.

LB confirmed that there was no requirement to provide a full guide and LGA were considering whether to produce a 2020 version. The brief guide includes all the information required by [The Occupational and Personal Pension Schemes \(Disclosure of Information\) Regulations 2013](#).

Action 13: LGA to consider 're-purposing' the full guide as an administrator guide and report back at the next meeting.

GMP equalisation queries

MJ reported receiving queries from members about GMP equalisation following a press article publicising underpayments of £25,000. Hampshire plans to add information to the fund website in an attempt to prevent further queries. No other funds had received similar queries so far.

LB confirmed that we expect a consultation on GMP equalisation in the coming weeks. The main proposal is likely to be to extend the current interim solution.

Member engagement

BC asked what other funds were planning to do to encourage member engagement during the pandemic. Shropshire has not been able to hold their usual member's annual meeting.

Other funds were adopting various methods to engage with members such as:

- Virtual meetings with groups of members
- Virtual meetings with individual members
- Surveying members and inviting them to participate in focus groups
- Increasing the amount of information available online, specifically information about investments
- Issuing newsletters more frequently and making them available on the member portal.

Funds are also planning to deliver employer engagement and training events online.

11. Future meetings

The group agreed that the next meeting should take place in early December.