



PENSIONS COMMITTEE 12 December 2012	REPORT

Subject Heading:	Automatic Enrolment
Report Author and contact details:	Contact: Karen Balam Designation: Transactional Manager Telephone: (01708) 432271 E-mail Address: Karen.balam@havering.gov.uk
Policy context:	To advise the committee of the potential impact of automatic enrolment on the pension fund and its constituent employers and the actions to deliver automatic enrolment for all staff in the Local Government Pension Scheme and Teachers Pension Scheme in accordance with the with Pensions Act 2008 and 2011.
Financial summary:	The development of automatic enrolment is a cost to the employing bodies, there are no direct costs to the Pension Fund. The costs for the employing body are being met from corporate resources.

The subject matter of this report deals with the following Council Objectives

Clean, safe and green borough	<input type="checkbox"/>
Excellence in education and learning	<input type="checkbox"/>
Opportunities for all through economic, social and cultural activity	<input type="checkbox"/>
Value and enhance the life of every individual	<input checked="" type="checkbox"/>
High customer satisfaction and a stable council tax	<input type="checkbox"/>

SUMMARY

The report is to advise Committee of the new pension reform legislation covering automatic enrolment and to seek approval to the following recommendations.

RECOMMENDATIONS

- 1 Members note the impact of automatic enrolment and the activities to prepare for the Council's staging date of 1 March 2013 in accordance with Workplace Pension Reform.
- 2 Members agree the Communication Plan for auto enrolment and note that a revised Pension Fund Communication Strategy will be brought to the March Pension Committee meeting.

REPORT DETAIL

- 1.1 Following the Government's acceptance of the Lord Hutton report on pensions reform, several initiatives have been instigated under Workplace Pensions Reform. The Pensions Regulator together with the Department of Work and Pensions are overseeing the changes to the Pensions Act 2011, which requires all employers to offer a pension scheme to their employees, to automatically enrol those who meet certain criteria on the employers **staging date**, monitor other employees to ascertain when they meet the set down criteria, and to re-enrol those who opt out of the scheme every 3 years.
- 1.2 The main aim of the legislation is to increase pension provision in the private sector, however no employer is exempt from this legislation and so all organisations across all sectors must comply. All staff employed in local authorities are eligible to join an occupational pension scheme – either the Local Government Pension Scheme or the Teachers Pension Scheme however employees have the right to opt not to join the scheme, or opt out at any time. Therefore all local authorities will still be required to undertake the additional administration of automatically enrolling all eligible employees who are not in either pension scheme. Appendix A sets out the definitions of workers, showing the criteria that needs to be met, together with other relevant definitions.

- 1.3 The implementation date is being staggered across the country with the largest employers having to comply first. This staggering of the implementation is known as the “**staging date**”. For Havering this is 1 March 2013.
- 1.4 The Council’s Financial system (Oracle) has to be updated with a required legislative system patch to ensure it complies with the complexities of automatic enrolment, in identifying those employees meeting the necessary criteria and reporting accordingly. This will be tested to ensure the system can deliver the required outcomes. Should there be any issues that arise from the testing the Head of Internal Shared Services may need to request a delay to the staging date from the Pension Regulator.
- 1.5 The implementation and operation of automatic enrolment places upon employer’s specific requirements and on-going responsibilities. These are set out in summary at Appendices B and C. A cross functional Working Group has been established in Internal Shared Services to ensure delivery of the tasks and procedures identified. Appendix D lists the members of the Working Group and their role within it.
- 1.6 Key tasks include :
- Determine the **staging date**
 - Ensure that any schools or other institutions with staff eligible to join either the LGPS Havering fund, or Teachers Pensions, but who use external payroll services are aware of the Councils’ staging date and the regulations compelling them to enrol any relevant staff into the relevant scheme
 - Decide whether to bring forward the Council’s staging date and if so, to notify the Pensions regulator accordingly
 - Identify those **eligible jobholders** who have to be automatically enrolled in to the appropriate pensions scheme
 - Automatically enrol all **eligible jobholders** into the appropriate pension scheme
 - Re-enrol those who opt out of either pension scheme every 3 years
 - Provide mandatory information and letters to all staff regarding their position under automatic enrolment
 - Monitor **workers** monthly and automatically enrol those becoming eligible
 - Keep accurate records to comply with the above.
 - As an employer, prevent unfair treatment of workers
 - Ensure all necessary procedures are in place to comply with automatic enrolment legislation.
- 1.7 The key procedural task is to register with the Pensions Regulator within 4 months of the staging date, and triennial re-enrolment date, providing all required information, demonstrating how the Council has complied with it’s automatic enrolment duties.
- 1.8 The statistics around automatic enrolment at the London Borough of Havering are that at present, only up to approximately 700 non schools employees are not in either the LGPS or Teachers Pension scheme, hit the age or earnings

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trigger and are therefore due to be enrolled under automatic enrolment (eligible jobholders). See the tables below:

Table 1 – Total Membership Table

	Total assignments	LGPS Members	Teachers Pension Scheme Members	Total Pension Scheme Membership	Total not in a pension scheme
L.B. Havering employees (non schools)	2,859	2,095	76	2,171	688
L.B. Havering employees (schools)	5,333	2,500	1,455	3,955	1,378
Totals	8,192	4,595	1,531	6,126	2,066

Note: employees can have more than one employment, each employment is counted as a separate assignment in the figures above.

Table 2 – Number and category of employees

	Entitled Workers	Eligible Jobholders	Non Eligible Jobholders	Total
Local Government Pension Scheme Non schools	314	286	57	657
Local Government Pension Scheme Schools	619	95	52	766
Teachers	301	246	96	643
TOTALS	1234	627	205	2066

- 1.9 It has been identified that the estimated cost of employers contributions per year, if all eligible jobholders that were automatically enrolled stayed in the appropriate pension scheme (LGPS and Teachers), is approximately £2.4 million. However, all salary budgets already include the on-cost for employer's contributions. Where a member of staff is not in either pension scheme, it is assumed that the underspend on salary budgets would be offsetting other expenditure. A table is set out below to show the impact on Local Government pension scheme employees and Teachers Pension employees.

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	Eligible Job Holders	100% Employers contributions	20% Employers contributions
LGPS – Council Corporate	286	1,513,000	303,000
LGPS – Schools	95	313,000	62,000
LGPS Impact		1,826,000	365,000
Teachers (Council and Schools)	246	595,000	119,000
Totals	627	2,421,000	484,000

Note: average salary per group was used, rounded to nearest £1,000, ignoring national insurance impact

- 1.10 Realistically, as these staff have already opted out of their pension scheme when they were enrolled contractually, it is not envisaged that all 600+ will decide to stay in the pension scheme, and indeed they do not have to. It could be prudent to assume that 20% stay in and so the estimated cost in employer's contribution is £484,000 per year (Local Government pension scheme impact being £365,000 and Teacher Pension scheme impact being £119,000).
- 1.11 Due to the low volume of eligible employees who are currently not members of any pension scheme, it is not being recommended that the Council apply for transitional delay until 2017. Automatic enrolment would still have to be carried out for all new staff who join the Council after the staging date as well as those who become eligible jobholders for the first time following the staging date, therefore to operate a "dual system" of automatic enrolment would increase administrative burden.
- 1.12 Although March is not an ideal time for automatic enrolment, the system testing required and ensuring administrative processes are in place, mean that it is not feasible to bring the staging date forward. Therefore it is deemed appropriate to retain the 1 March 2013 as the automatic enrolment date for Council employees.
- 1.13 The Automatic Enrolment Working Group will review all stages of the preparation for implementing automatic enrolment. Should there be any concerns that the authority is not able to comply with the procedures, such as system testing is not successful the Council will seek a delay of the staging date with the Pensions Regulator. There is no requirement to inform the Pension Regulator in advance, but the Council must inform them of the date in the Council's registration.
- 1.14 In accordance with legislation around earnings, casual workers are to be automatically enrolled when their pay hits the earnings trigger. However, it is possible to postpone enrolling them for up to 3 months, utilising the postponement for the maximum time allowed will allow the Council to take into account any "spikes in pay". The effect would be that many casual workers

would not then be enrolled, as it is expected that casuals would not earn above the earnings trigger regularly.

- 1.15 Admitted and Scheduled bodies of the London Borough of Havering Pension Fund out with the payroll service will be contacted to identify their requirement for support to deliver automatic enrolment and confirm their staging dates. Organisations that use the Council's payroll bureaux will be contacted to ascertain the support they may require. A table of the Admitted and Scheduled body staging dates is attached at Appendix E.
- 1.16 It is proposed that support for Admitted, Scheduled and external organisations be provided on the basis of a chargeable service. A scale rate of charges will be developed based upon a package of support, which will be developed by the Working Group.
- 1.17 Decisions regarding registering with the Pension Regulator, triennial re-enrolment, delay to the staging date, deferring automatic-enrolment for casual workers, and charging for supporting external bodies are a matter for the Council as employer.
- 1.18 Advice has been taken from Human Resources regarding agency workers and at this stage it is believed that it will be the responsibility of agencies to provide a suitable pension scheme, and will not be a responsibility for organisations engaging agency workers. We will keep the pension status of agency workers under review and report back to Members if there are any changes that impact upon the Council or the Pension Fund.
- 1.19 A specific issue has arisen regarding employees with inter-dependent multiple assignments, which the regulations state have to be aggregated. The impact of this would be to increase the number of employees who would fall into the category of eligible employee on the grounds of earnings. Interdependency relates to where an employee has more than one contract of employment but all the contracts are linked, therefore if one contract is terminated all the contracts would be terminated. Examples of inter-dependent employees would be Learning Support to assist a child with the support carrying out roles as classroom assistant and midday supervisor. The process and system capabilities of correctly identifying inter-dependent multiple assignments will take place and appropriate actions will be put in place to ensure compliance with the Pensions Act 2011.
- 1.20 A communications plan has been agreed by the Head of Internal Shared services, in conjunction with the Councils Communication team. The plan is shown as Appendix F.

IMPLICATIONS AND RISKS

Financial implications and risks:

The estimated level of impact on the Pension Fund if all eligible job holders from the London Borough of Havering remained in the LGPS would be additional contributions of £1.8m. The likely impact on authority and school budgets, on the assumption that 20% of those automatically enrolled remain in the LGPS is £365,000 per annum of additional payments to the fund with liabilities falling due at some future date.

The additional contributions reflect additional costs to the council through additional employer contributions which may not be met from existing budgets, however as services should budget in full for employee costs, this is probably a relatively low risk. The impact of additional employer pension contributions through increased scheme membership will have to be managed within existing budgets.

The project is being led by the Pension Project Manager, who is funded by the Pension Fund. This area of work is an employer responsibility and cannot be met by the Pension Fund. The project is over and above the services provided by Internal Shared Services and is not funded within ISS budgets, therefore the time spent on this project by the Pension Project Manager will be met from corporate Council budgets. The estimated one-off staffing costs (1/6th of the gross salary costs of the Pension Project Manager) to be met centrally are £10,000. The costs of communications and training will also be met from corporate Council budgets, as an employers function, at this stage these costs have not been estimated.

It should be noted that the Pension Regulator fines for non compliance or failure to deliver would be £10,000 per day for the Council. The Pension Regulator ascertains the numbers of people on each PAYE reference with HMRC in order to inform all employers of their staging dates, issues count down letters and has the powers to check on organisations for compliance. The level of fines are determined by the size of the employer.

There is a risk that the Council will not have the correct processes in place to evidence compliance as required by the Pension Regulator. This risk is being managed through the Working Group ensuring all areas properly briefed on their responsibilities and actions and training of all relevant employees involved in delivering auto enrolment. Further to this, the ISS audit plan will be reviewed in conjunction with the Head of Internal Audit. In addition to this, there is a risk that the financial system patch will fail to operate as required, this will be managed by testing and deferring our staging date if necessary.

Legal implications and risks:

The Pensions Act 2011 requires employers to register with the Pension Regulator and automatically enrol eligible employees into a qualifying pension scheme where they are not currently a member. This task then needs to be repeated every 3 years. This imposes significant administrative burdens on the London Borough of Havering and has financial implications.

Failure to comply with the automatic enrolment regulations will expose the Council to the risk of fines imposed by the Pension Regulator.

Human Resources implications and risks:

There will be an ongoing change in processes and procedures to ensure that the required legislation is delivered and built into working practices.

The delivery of auto enrolment is a priority of the Council due to the legislative requirements, with a team of relevant experts ensuring delivery from within ISS and across the Council through the Automatic Enrolment Working Group. The information of who is eligible to be automatically enrolled in the Local Government Pension Scheme (LGPS) is identified from the HR and Payroll system, which will be updated by a system 'patch' to allow the system to deliver the legislative change. Robust system testing of the 'patch' will take place to ensure it delivers the expected outcomes.

Equalities implications and risks:

Since the Amendment Regulations, October 2012, all non teaching employees have the right to join the LGPS. All non teaching employees with a contract of 3 months or more are already automatically enrolled in the LGPS. All non teaching employees with contracts of less than 3 months (including casuals) may now elect to join the LGPS.

BACKGROUND PAPERS

The Local Government Pension Scheme Regulations (various) and the Guidance notes issued with them.

APPENDIX A

DEFINITIONS OF WORKERS AND TERMINOLOGY

Worker	An employee or a person who has a contract to provide work or services personally and is not undertaking the work as part of their own business.
Jobholder	A worker who: <ul style="list-style-type: none">• is aged at least 16 and under 75• works, or ordinarily works in the UK, and• earns above the lower earnings level for qualifying earnings. The category of jobholder further subdivides into 2 groups: 'eligible jobholders' and 'non-eligible jobholders'.
Eligible jobholder	So-called because they are 'eligible' for automatic enrolment. This is a jobholder who: <ul style="list-style-type: none">• is aged at least 22 but has not yet reached state pension age, and• earns above the earnings trigger for automatic enrolment
Non-eligible jobholder	So-called because they are not eligible for automatic enrolment (though they can choose to 'opt in' to an automatic enrolment scheme). This is a jobholder who: <ul style="list-style-type: none">• is aged at least 16 and under 75, and• earns above the lower earnings level of qualifying earnings but below the earnings trigger for automatic enrolment. Or: <ul style="list-style-type: none">• is aged at least 16 and under 22, or between state pension age and under 75, and• earns above the earnings trigger for automatic enrolment.
Entitled worker	A worker who: <ul style="list-style-type: none">• is aged at least 16 and under 75• works, or ordinarily works in the UK, and• earns below the lower earnings level for qualifying earnings.

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Qualifying earnings	This includes all of the following pay elements (gross): <ul style="list-style-type: none">• Salary• Wages• Commission• Bonuses• Overtime• Statutory sick pay• Statutory maternity, paternity and adoption pay. These earnings are used to identify whether an individual is an eligible jobholder or a non-eligible jobholder. However the level of pay that contributions are paid on is in accordance with the regulation definition of pensionable pay.
Automatic enrolment	When an employer places eligible jobholders into an automatic enrolment scheme 'automatically', ie without the jobholder's involvement. An individual who is automatically enrolled is free to opt out and can stop saving at any time, but needs to take action to do so.
Qualifying scheme	A pension scheme that meets certain minimum standards set by legislation. There are different standards depending on the type of scheme.
Automatic enrolment scheme	A qualifying scheme that meets additional criteria to be an automatic enrolment scheme. Eligible jobholders who are not already a member of a qualifying scheme on the employer's staging date must be automatically enrolled into an automatic enrolment scheme. The employer will choose the scheme for automatic enrolment.

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Staging	The staggered introduction of the new employer duties, from 2012, starting with the largest employers. New PAYE schemes will be staged last.
Staging date	The date when the new law is 'switched on' for a business
Phasing	For DC schemes, the gradual phasing-in of contribution levels until they reach the minimum level required by law.
Registration	A duty on employers to tell the regulator information about the pension scheme they are using and how many people they have enrolled into it.

SUMMARY OF TASKS – EMPLOYERS RESPONSIBILITY

The following list is a summary of tasks required under legislation to implement automatic enrolment

A	Determine the staging date in accordance with the Pensions Regulators instructions
B	Ensure that any schools or other institutions with staff eligible to join either the LGPS Havering fund, or Teachers Pensions, but who use external payroll services are aware of the Councils' staging date and the regulations compelling them to enrol any relevant staff into the relevant scheme
C	Decide whether to bring forward the Council's staging date and if so, to notify the Pensions regulator accordingly
D	Decide whether or not to apply the transitional delay period
E	Identify those eligible jobholders who have to be automatically enrolled in to the appropriate pensions scheme on 1 March 2013
F	Automatically enrol all eligible jobholders into the appropriate pension scheme on 1 March 2013,
G	Re-enrol those who opt out of either pension scheme every 3 years
H	Provide information to "eligible" and " non-eligible " jobholders about automatic enrolment and pensions including mandatory letters at automatic enrolment and re-enrolment dates
I	Monitor workers every month to assess their eligibility and automatically enrol those not in the relevant pension scheme when they become eligible
J	Process requests to opt out of a pension scheme and refund pension contributions as required
K	Keep accurate records to comply with the above
L	As an employer, prevent unfair treatment of workers by taking action to induce a job holder to either not join the relevant pension scheme, or to opt out of the scheme if already a member
M	Provide Support to external organisations on L B Havering's payroll to ensure they understand and comply with the legislation, and make charges where appropriate
N	Ensure all necessary procedures are in place to comply with automatic enrolment legislation.

APPENDIX C

SUMMARY OF PROCEDURES – EMPLOYERS RESPONSIBILITY

The following list is a summary of the procedures that need to be put in place.

A	To ensure all workers commencing employment after the staging date with a contract of employment of less than 3 months are issued with the appropriate letter in accordance with the Pensions regulators instructions, within 2 months of starting work
B	To ensure all workers who are issued a “postponement letter are monitored and “contractually enrolled” into the appropriate pension scheme if / when their contract is extended to 3 months or more and the appropriate letter then sent to them within 2 months of the contract change.
C	To ensure all workers who are issued a “postponement letter are monitored and “contractually enrolled” into the appropriate pension scheme if / when their contract is extended to 3 months or more and the appropriate letter then sent to them within 2 months of the contract change.
D	To ensure payroll processes monitor and report in each pay reference period , any workers hitting age and or earnings triggers, and to automatically enrol them in to the appropriate scheme if not already a member.
E	To ensure that any worker who has previously opted out of the pension scheme, and hits an age or earnings trigger, <u>for the first time</u> , (eligible worker) is automatically enrolled, and that the appropriate letter is sent within 2 months of being enrolled.
F	To ensure that any employee who commences employment on or after the “staging date ² and opts out of the appropriate pension scheme, is within 1 month of becoming an entitled worker, or non-eligible worker for the first time, issued with an appropriate letter to remind them that they can rejoin the scheme at any time.
G	To ensure that any employee who commences employment on or after the “staging date ² and opts out of the appropriate pension scheme, is within 1 month of becoming an entitled worker, or non-eligible worker for the first time, issued with an appropriate letter to remind them that they can rejoin the scheme at any time.
H	To ensure all existing workers on the Council’s staging date who are already members of either pension scheme are issued with the appropriate letter within 2 months of the staging date .
I	To ensure that any workers who are entitled workers or non-eligible jobholders who are not in either pension scheme, and have a contract for 3

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	months or more, are issued with the appropriate letter, reminding them that they can join the appropriate scheme.
J	To ensure that existing workers who are entitled workers or eligible jobholders on the Council's staging date and are not members of either pension scheme, and have a contract of less than 3 months are sent a postponement letter within 1 month of the staging date.
K	That workers identified in i) are then contractually enrolled into the appropriate scheme when / if their contract is extended to 3 months or more, if they are not already in the scheme.
L	All pension contributions deducted are paid in to the pension fund together with the employers contributions timely. – <i>we do have the right to delay paying these in, but it is not recommended.</i>
M	To ensure that the appropriate information is available for inclusion when registering with the Pensions regulator following automatic enrolment, and triennial re-enrolment.
N	To decide what the re-enrolment date should be, as this can be an alternative date, either up to 3 months prior, or up to 3 months following the calendar 3 year staging date anniversary.

THE WORKING GROUP

The following areas of ISS and the Council comprise the working group for automatic enrolment:

Project Lead leading, training and updating the team
to acquire such knowledge to be the councils perceived expert on AE in conjunction with schools HR running meetings
ensuring deadlines and work plans met

recommend registering with pensions regulator
to ensure the councils pension website for LGPS is updated and ready
to arrange for any additional resource as necessary

Payroll systems spec the necessary changes to the Oracle payroll system
ensure the payroll system holds required data
ensure any changes to the system are in place timely
check the above works
ensure the required reports are produced from Oracle, creating them where necessary
ensure all the above are in place for all Employers using oracle for their payroll

Transactional Payroll to be the teams recognised expert on AE pertaining to their sections work
to identify any impact for the team,
to identify any procedures that need amending
to ensure any training for the team is carried out
to identify any paperwork/ reports that need amending

Transactional HR to be the teams recognised expert on AE pertaining to their teams work
to identify any procedures that need amending to comply with AE
to identify any documents that need amending to comply with AE
to train the rest of the team in relevant matters of AE

Operational HR to be the teams recognised expert on AE pertaining to their teams work
to identify any procedures that need amending to comply with AE
to identify any documents that need amending to comply with AE
to train the rest of the team in relevant matters of AE

Schools HR to be the teams recognised expert on AE pertaining to their teams work
to identify any procedures that need amending to comply with AE
to identify any documents that need amending to comply with AE
to train the rest of the team in relevant matters of AE

Communications to assist with creating communications plan, utilising mandatory documents etc already available

to identify the appropriate media and the timeliness of communications

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to whom
what
when
renewal

Pensions

to identify any forms, letters and literature to be amended to comply with AE
to ensure amended procedures are in place to comply with AE
to train the team on the above and all relevant matters on AE
communication to scheme members
communications to non scheme members with mandatory wordings
create new forms in accordance with regulators instructions
amend / create new letters in accordance with regulators instructions
amend / create new procedures for new employees
create new procedures for staff auto enrolled
create new procedures for staff re- enrolled every 3 years
create new procedures for staff auto enrolled once hitting a trigger

APPENDIX E

STAGING DATES FOR ALL EMPLOYERS IN THE HAVERING LGPS FUND

EMPLOYER NAME	TOTAL NO OF STAFF (ASSIGNMENTS)	STAGING DATE	EMPLOYER STATUS
L B Havering	8,192	1 March 2013	SCHEDULED
Sacred Heart of Mary	181	1 April 2014	ACADEMY Own employer
The Brittons Academy	231	1 April 2014	ACADEMY Own employer
Campion School	211	1 April 2014	ACADEMY Own employer
Hall Mead School	225	1 April 2014	ACADEMY Own employer
St Edwards Church of England School & 6 th form College	236	1 April 2014	ACADEMY Own employer
Emerson Park	185	1 April 2014	ACADEMY Own employer
Redden Court	138	1 May 2014	ACADEMY Own employer
The Albany School	159	1 May 2014	ACADEMY Own employer
Chafford School		To be obtained	
The Royal Liberty School		To be obtained	
Abbs Cross School		1 May 2014	ACADEMY Own employer

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Frances Bardsley		To be obtained	ACADEMY Own employer
Coopers Coborn		To be obtained	ACADEMY Own employer
Drapers Academy		To be obtained	ACADEMY Own employer
Havering college of Further & Higher Education		To be obtained	SCHEDULED Own employer
Havering 6 th form College		To be obtained	SCHEDULED Own employer
Citizens Advice Bureau		To be obtained	Community Admission Body
Morrisons		To be obtained	Transferee Admission Body
SLM - Fitness & health		To be obtained	Transferee Admission Body
SLM – Community Leisure		To be obtained	Transferee Admission Body
KGB Cleaners		To be obtained	Transferee Admission Body
Volker		To be obtained	Transferee Admission Body

COMMUNICATIONS PLAN FOR AUTOMATIC ENROLMENT

In agreement with the Communications Team, the following communication plan is agreed (in compliance with the legislative requirements)

1. Auto enrolment to be included as a core brief item for delivery Council wide
 2. Following on from the above, a similar brief to be issued to schools as they do not receive the Core Brief. Methodology to be discussed with Louise Howard.
 3. An “In Brief” session to be arranged according to demand.
 4. Team meeting attendance of a member of the Auto Enrolment working group.
 5. Regular working group meetings, escalating towards the staging date.
 6. Roadshows to areas that are likely to be “high opt out” areas or remote locations.
 7. Posters to be produced and displayed in all workplaces, including schools.
 8. Handouts to be considered for insertion into payslip envelopes
 9. Delivering the relevant letters to those currently members of the scheme and also to those that were being automatically enrolled using the most cost effective methods identified, and electronically where possible. For those being auto enrolled, send letters to home addresses.
- This item has to be considered further when the style and mandatory content of the letters is established following consultation with the LGA and following the recommendations of the Pension Regulator.

A “drip, drip” communication approach is to be adopted, commencing November 2012, and the next step being from January 2013, to ensure that information was not delivered and received too far ahead of the staging date, thus keeping it to the front of employees minds.

This plan is to be kept “live” and reviewed for each 3 year renewal date.

Meetings and discussions with Trade Unions led by Pensions Project Manager.