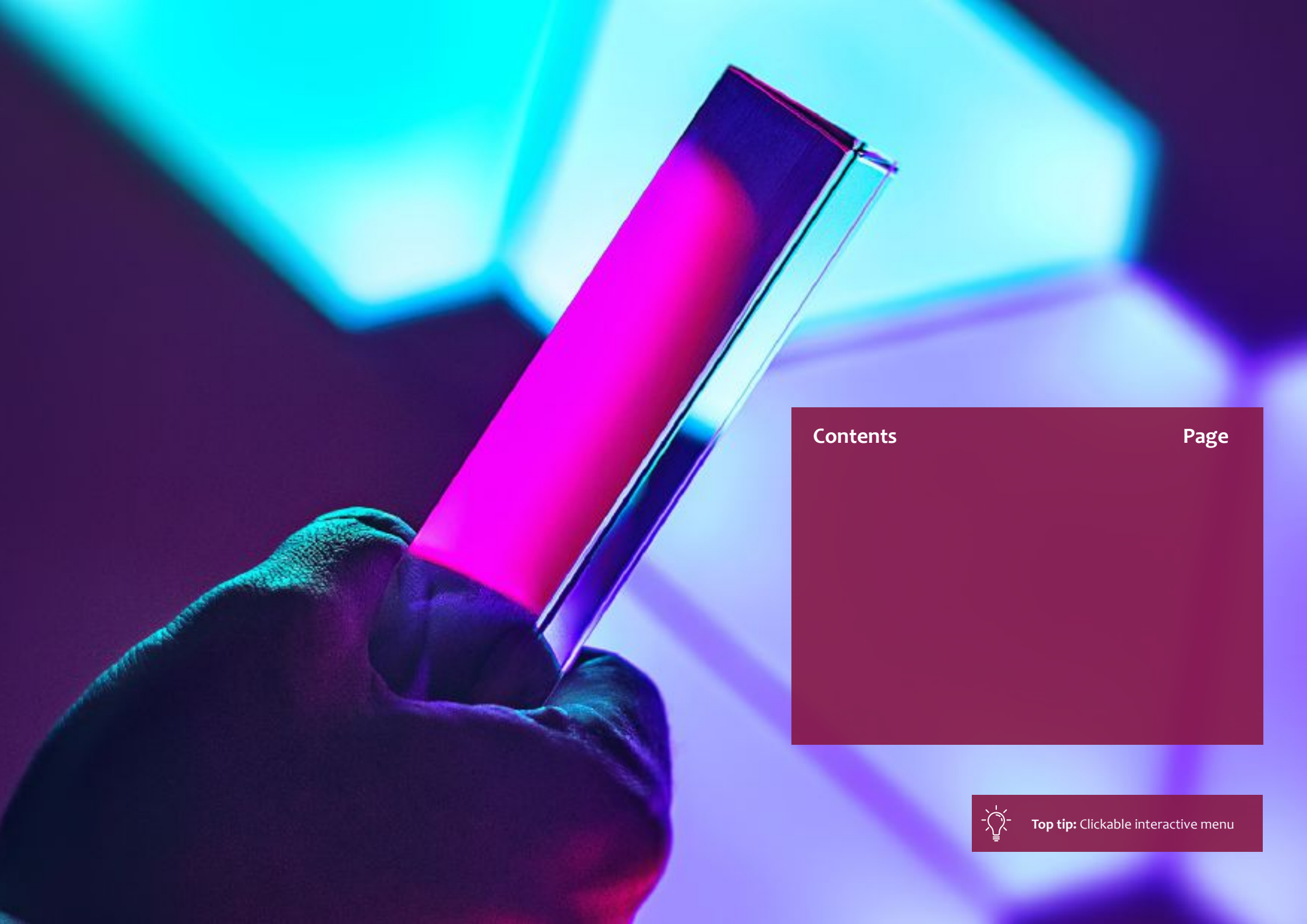


GMP Equalisation Working Group

Communications Sub-Group

Guide to GMP Communications - Implementation Stage
September 2021



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Top tip: Clickable interactive menu

1 Acknowledgement

This Guidance has been carefully written with representation and inputs from all pensions professional disciplines. PASA is grateful to the authors of the Guidance and their active participation in the Communications Sub-Group of the GMP Equalisation Working Group and to their employers.

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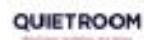
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This Guidance has kindly been designed,
as per earlier guidance, by



2 Introduction

Welcome to this second instalment of guidance on communicating GMP Equalisation. We've taken an approach which places the individual at the centre of our thinking, cutting through the technical noise to simplify the who, why, what and when of communications for members.

This Guidance is designed for schemes in the implementation stages of GMP Equalisation where they are getting ready to start (or may have already started) communicating with members and are actively working with other specialists to deliver equalisation. We build on [Guidance](#) published in 2020.

This Guidance comprises:

- **Introduction** to explain what this guidance includes (and doesn't) and how to use it
- **Broad principles** schemes can follow when implementing their communications to members
- **The member's perspective** and the normal context of other scheme communications
- **Timing your communications** activity and the delivery milestones
- **Who to communicate with**, what to tell them and why
- **Planning for data** to use in communications
- **Post equalisation** considerations for your 'business as usual' communications

We've also included lots of **links to relevant content** in the guidance on the early planning stage of communications.



We've provided some common phrases, paragraphs and content headers schemes can use in their communications. We encourage schemes to work with this Guidance to fully consider their own members' circumstances.



We have not set out a prescriptive approach to any consultation or disclosure requirements. We recommend schemes refer to their lawyers as appropriate and work closely with their communications specialist.



Principles of the planning stage

You might like to refer to our first guidance, [Guide to GMP Communications – Early Planning Stage](#), which covers:

- ✓ How to approach communications, how to work effectively with your administrators, and what you need to say to individuals (if anything at all)
- ✓ Broad principles schemes can follow when planning communications
- ✓ Some practical dos and don'ts
- ✓ Considering your scheme's unique demographic of individuals
- ✓ Practical things you can do now, including helping your administrators
- ✓ Q&As schemes can use as a starting point to respond to people
- ✓ A checklist of the regular communications which may need to be reviewed, which schemes can use as a starting point
- ✓ A jargon buster for schemes to use as a guide to help with words and phrases people may find confusing. We strongly encourage all schemes to use these definitions so people have a consistent experience.

3 Guiding principles for communicating

Consider the context

As we noted in our [Guide to GMP Communications – Early Planning Stage](#), a good starting point for any piece of communication is to ask yourself:

- 1 What do you want people to know?
- 2 How do you want individuals to feel?
- 3 What do you want them to do?



You should also think about the characteristics of your membership – there is not a one size fits all approach.

- What approach is going to connect best with your membership?
- What do they know already

✓ Layering the information

Think about the best way to give people details. Layering the information can help them easily understand the issue. For example, start with the key points and signpost where the next level of detail is for those who want it. You could also give this extra layer of information in a different format, such as on a website, or as an appendix to a letter.

✓ Using different channels

There are lots of different ways of delivering a message – whether this is via letter or email, websites, webinars or presentations. Different schemes will have used different approaches in the past, and there may be a typical way for them to communicate with members. Using different channels can help support the layering of information.

✓ Do you need to mention that?

This is a KEY question to challenge yourself with. It may be tempting to provide people with a lot of detail about why GMP equalisation is an issue, and explain all the complicated work which has been done behind the scenes, but do they really need to know this? We recommend you keep your communication as simple as possible.

For example

Rather than going into the detail about one implementation method over another, it may be all the individual needs to be told is the scheme has worked hard to implement GMP equalisation and professional advice has been taken to help with this. People will be most interested in what is happening to their pension amount – and it may be you can tell them this in a straightforward and factual manner without saying much at all about the history of contracting out, the Lloyds cases, and the details of operating dual records!

In some cases, more detail about the process might be needed – it may be appropriate in the context of the scheme or the membership to provide a certain level of background detail, for example if unions are engaged. Different groups will be affected in different ways. If you are explaining to someone their pension in payment is going down, you'll understandably want to say more to explain why. When planning communications, group people based on the particular message they will be getting – is it positive or negative, and does it warrant a more detailed explanation?

✓ Avoiding jargon

Wherever possible, technical jargon should be avoided. In many cases, this may prove easier than at first thought – if you have challenged yourself as to whether the detail is really needed, you are likely to find some jargon (e.g. Method B, dual records, cross-over members) simply isn't needed. Where it is necessary to explain pensions concepts, think about the best way of doing this. For example, a concept such as 'actuarial value' is not likely to mean much to an individual, and there may be a clearer way of telling them about the overall value of their pension.

✓ Involving others

Think about who the other stakeholders are and how they should be involved. These stakeholders are likely to include the company, pensions manager, administration teams, legal adviser, actuary or technical specialist, communications specialist and financial advisers.

It makes sense from a process perspective to agree an approach with your stakeholders upfront, and how they will feed in. This will help ensure a smoother drafting process and alignment of objectives.

It is also worth thinking about whether there are key messages you should agree with the other stakeholders and include in the communications. For example, there may be some business context to provide, the Trustees and the Company may want to set out how they have approached the project, and there may be reputational points to bear in mind.

✓ Being trustworthy

Make sure you use your normal scheme letterhead or formatting, so your communication is in line with your regular communications and is not mis-interpreted as not being genuine. Think about how deferred members may react to receiving something out of the blue: will it be recognisable?

Where you may have links to online communications or are requesting information, for example in the context of conversion, make sure you include appropriate safeguards and reassurances about the security of the site and member information.

4 The member's perspective

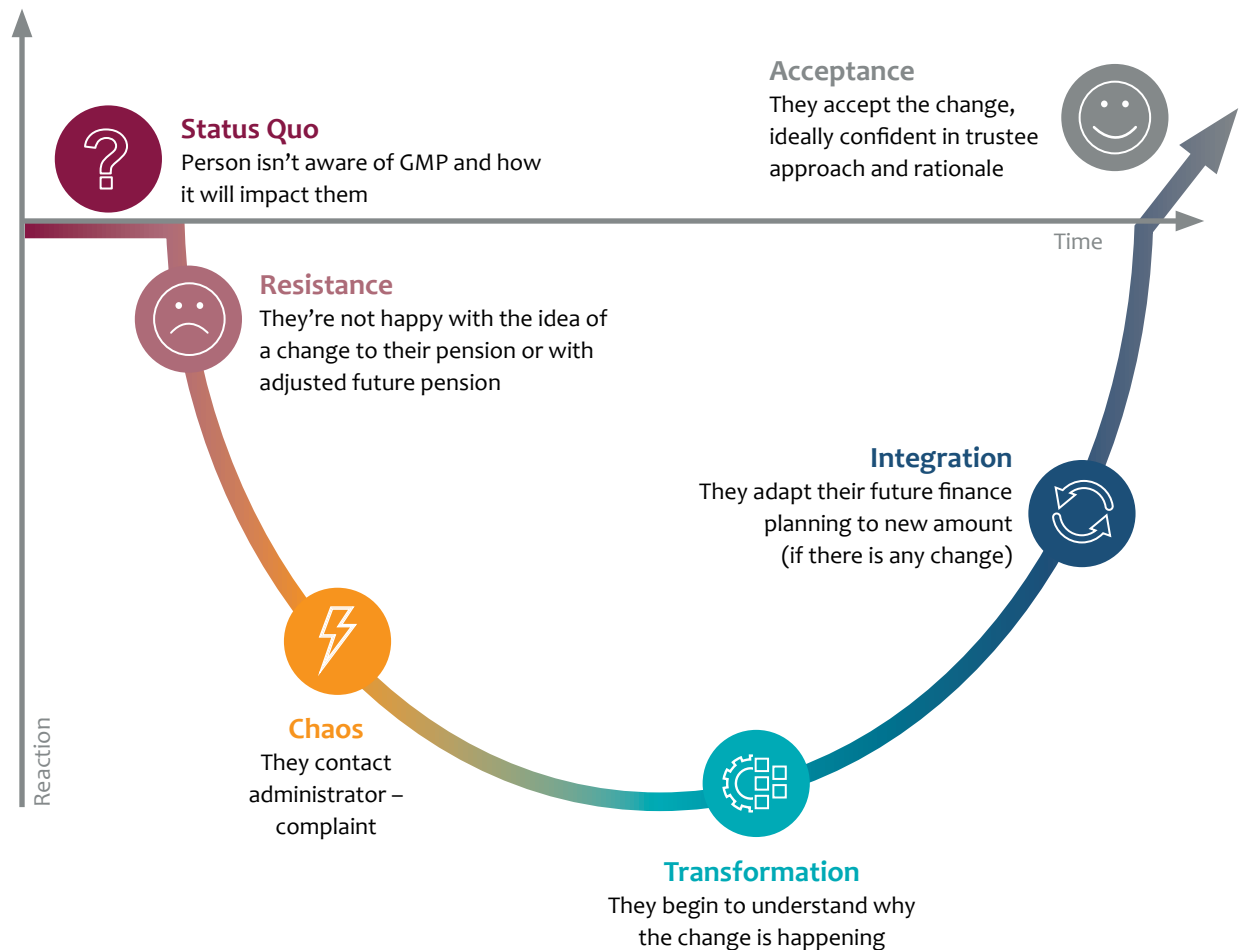
Put yourself in non-pensions people's shoes.

GMP is a technical pensions area. We would encourage all pension professionals involved in these projects to take a step back when it comes to communications. Think about the individual. How will people feel about any changes?

Any change can shake someone's confidence

People expect their pension to be stable. Any change – for better or worse – can chip away at their confidence in their scheme or in pensions in general. Being aware of peoples' likely reactions may be helpful when planning your communications, particularly for anyone who's more impacted.

Here's a typical sequence of reactions to change, called the 'change curve', which is a tried and tested model. We've plotted the possible reaction to GMP equalisation onto this change curve.



Put the individual at the centre of your thinking

Here are some things to think about which could play a part in how you communicate with each person:



Plan out the order of all the information you'll be sending

Think ahead to anticipate the other messages you're going to need to send out. For example:

- 1 Rectification
- 2 Member option exercises
- 3 Buy-out exercises
- 4 Annual pension increases
- 5 Any other member communication exercises you're planning which might not be related to GMP

5 Timing your communications

The timing will be driven by the circumstances of your scheme, including the messages which have already been given to people.

You should consider:

- 1 Any legal requirements for informing members about GMP equalisation
- 2 The relative timing of rectification following GMP reconciliation and GMP equalisation/conversion (and other exercises which overlap)
- 3 Expectations about when they will next expect to hear about GMP equalisation
- 4 When to communicate in respect of any changes to past transfer values

1

Legal requirements

Where conversion is being used as the means of GMP equalisation, prescribed legal requirements – to consult with and notify certain members and survivors including deferred members – will shape the timing of communications. There is a requirement to take reasonable steps to consult “in advance” and to notify members/survivors “before, or as soon as is reasonably practicable after, the conversion date”. This allows some flexibility for schemes to determine the precise method and timing of these communications, but schemes should take appropriate advice to ensure their approach is legally compliant.

For example

a particular point schemes may wish to take legal advice on is the period of time to allow for the consultation window, which is not prescribed in the conversion legislation. The experience of the working party is schemes which have already undertaken conversion have used a range of between 30 to 60 days for the consultation window.

There may also be instances where a scheme chooses a different timeline to convert different categories of member, such as retired members in bulk and then deferred members individually at retirement or in batches.

Whichever method is used to achieve GMP equalisation, you should consider whether any additional notification obligations are triggered under the Disclosure Regulations. These require members to be notified when there are “material changes” to the benefits in the scheme.

2

Other best practice considerations

There is a more general question of when members should be told the impact of any adjustment on their benefit, rather than simply notified of the fact the benefits have changed or will change as a result of equalisation/conversion.

Those in receipt of a pension should be notified at the point of equalisation (ideally with reasonable advance notice) as this will be when any change to their benefits takes effect.

However, for deferred members there may be more than one acceptable approach, as the revised benefits will not come into payment until retirement. Trustees may wish to consider how best to achieve this, which could include informing members:

- At the time the change is known
- At the point they first receive a transfer or retirement quotation after equalisation
- In their next annual benefit statement (where these are provided)

It is best practice to ensure all forms of communications are reviewed so updated versions are available as soon as equalisation has been completed.

The August 2020 PASA ‘Guide to GMP Communications – Early Planning Stage’ contained a checklist of the items which should be reviewed and updated, where relevant. More detail on BAU administration is provided in Section 8.

3

Timing of communication relative to GMP reconciliation or other exercises

PASA's March 2020 guidance on 'When to rectify' summarises the position on the relative timing of rectification and equalisation as follows:



The starting position should be that GMP rectification should be progressed in a reasonable timeframe. In cases where GMP rectification is delayed in order to combine it with GMP equalisation, the evaluation of the impact of doing so and the rationale for deferral should be clearly documented."

Specifically, the guidance says the following on communications:



Will writing to members once in relation to GMP rectification only to be followed up by a communication about GMP equalisation manage expectations appropriately? An alternative option would be to complete the GMP rectification calculations and only then decide when to implement and communicate for some or all impacted members."

Whilst not within the scope of this Guidance, a decision will have been made about whether to rectify and equalise at the same time or in separate exercises. Looking at this from an individual's perspective, it is important to think about the continuity of the communications they may receive.

It is possible different decisions may have been made for different groups of members and this may impact the timing of the communications.

If a decision has been taken to rectify separately following the completion of the GMP reconciliation process, the communication to individuals about the reconciliation should normally refer to the fact there will be a separate equalisation exercise. Ideally this will indicate the likely timing of the subsequent communication relating to GMP equalisation. The members in scope for GMP reconciliation are unlikely to be identical to those in scope for GMP equalisation. It may be appropriate to tailor communications to groups of members to reflect this.

Similar considerations apply where you are also running other exercises alongside GMP equalisation, for example pension increase exchange (PIE) exercises, other benefit rectification work or communications relating to a planned buy-out. Where possible, the content of the communications should form a seamless sequence. Try to avoid a series of apparently unconnected communications. Let people know when you will next be in touch. Don't leave an information vacuum.

4

Member expectations

The August 2020 PASA 'Guide to GMP Communications – Early Planning Stage' indicated schemes did not necessarily have to communicate about GMP equalisation at an early stage. It might depend on what you had already told people and how you normally communicate with them. So, for example, if you had told members you would keep them informed about the progress of GMP equalisation you could do this through your regular communications.

Pensioners will expect a personalised notification of how GMP equalisation affects them with a reasonable advance notice of any change.

For deferred and active members you may wish to inform them equalisation has been completed from a scheme perspective and their benefits at retirement or transfer out will reflect the equalised position. How much detail members are expecting may depend on what you have told them they can expect to hear in previous communications. If you are using a conversion approach there may be other considerations, please see the earlier section on legal requirements.

5

Past transfers out

Following the Lloyds judgment on transfers out, schemes are considering the steps needed to comply with the ruling. This will have communication implications.

The decisions on who to communicate with and when will be determined by your approach to equalising the benefits of anyone who previously transferred out. Consideration should be given to all members who transferred out of your scheme after 17 May 1990 (including any who have transferred out on an unequalised basis following the first Lloyds judgment in 2018).

There are other factors which will affect how and when you communicate, such as availability of data to calculate the equalised benefits, addresses of former members and identities of receiving schemes.

Communications should inform people of any potential adjustments. For people who are not due a top-up, you may wish to consider if any of the groups above are expecting any updates and, if not, they can be excluded from the exercise.

It is unlikely to be practical for Trustees to communicate with everyone who transferred out on an unequalised basis and is not due a top up, so you may simply wish to put a general statement on your website (where you have one) confirming equalisation is complete. You may also wish to place a general statement on your website for the benefit of any former members you have been unable to trace telling them how to get in touch with you.

Supplemental Guidance on Transfer Payments (available [here](#)) provides more commentary about structuring transfer exercises, and circumstances when trustees may decide not to try to contact members.

6 Who to communicate with

You'll have to consider the different categories of members and the messages relevant to each group.

Here are the main ones:

1. **People who aren't impacted by this at all because they don't have any GMP**
2. **People who do have GMP but for whom the impact of equalisation won't be material**
3. **Pensioners and beneficiaries in payment** – dual records
4. **Pensioners and beneficiaries in payment** – conversion in bulk
5. **Deferred members** – dual records
6. **Deferred members** – conversion in bulk
7. **Deferred members** – conversion at retirement
8. **Active members** – dual records
9. **Active members** – conversion in bulk
10. **Active members** – conversion at retirement
11. **People who transferred out or have taken a full commutation on an unequalised basis**

You could also refer to these groups as 'non-pensioners'

You may also have some former members or their dependants who died and to whom a GMP was payable which means you may need to correspond with whoever is looking after the Estate.

Within those categories you might also be able to identify some people who require tailored information, for example, people with tax protections, lifetime or annual allowance issues, or in respect of the tax treatment for back payments, those with multiple records, GMP underpins or members with very large/small uplifts.



There is comprehensive Guidance, including some communication templates in the PASA GMP Equalisation Tax Guidance Note on Tax Issues available [here](#).

Pensioners and beneficiaries in payment

Your message to pensioners and beneficiaries in payment will depend on the method you're using for GMP equalisation.

Example text

"We wrote to you a while ago about a process we've had to go through called GMP equalisation. We've now completed this."



If you're using a Dual Record method

Some will be due a back payment, some won't. Some will be due an uplift and some won't. Some will be due both, some neither.

All members will need to be reassessed each year to establish whether any adjustment is required, but this does not necessarily require a tailored annual communication. Confirmation of any back payment will only be required in the first year of equalisation.

Pensioners and beneficiaries in payment	Due a back payment	Not due a back payment
Due an uplift	A C D	A D
Not due an uplift	A C	B

For all pensioners and other beneficiaries in payment who need to be reassessed every year you might say something like:

A Example text

"You don't need to do anything, the adjustments will be made automatically. The scheme will carry out an assessment each year and any further adjustments will be taken into account at the same time as the usual annual increases."

For all pensioners and other beneficiaries in payment who **do not** need either a back payment or an uplift, you might say something like:

B Example text

"You don't need to do anything, [the adjustments will be made automatically]. We've checked your records and your benefits. We've found we don't need to change anything in your case. The scheme will carry out an assessment each year and any further adjustments will be taken into account at the same time as the usual annual increases."

For all pensioners and other beneficiaries due a back payment you might say something like:

C Example text

"We've worked out you're owed a back payment of £xx.xx to cover the pension you should have received up to now. This includes all the interest you're due at the rate of [x% a year]. We'll add this to your next pension payment as a one-off cash sum."

Comprehensive guidance on the treatment of arrears appears throughout the PASA Guidance Note on Methods which is available [here](#).

For all pensioners and other beneficiaries due an uplift you might say something like:

D Example text

"We've worked out you should be receiving more each month from now on. At the moment you're getting £x a month. From [date] this will be £y a month. You'll still get your usual annual pension increase in the same way, every [MONTH OF THE ANNUAL INCREASE]."

Pensioners and beneficiaries in payment



If you're using the conversion method

Some will be due a back payment, some won't. In this Guidance we haven't covered your consultation materials. Each scheme will have its own requirements and you'll need to talk to your own advisers.

Once you've completed the consultation you'll need to write to people to let them know how it affects them (including, where benefit changes are being made as part of the conversion process and how these changes affect their entitlement).

E Example text

We wrote to you a while ago about our proposal to convert the GMP part of your pension. The consultation is now finished and we're going ahead with the conversion. This makes it simpler for the scheme in the future.

[You may also want to add your own text in here to explain the before and after effects and amounts on an individual member basis.]

We won't need to write to you about GMP again.

Pensioners and beneficiaries in payment	Due a back payment	Not due a back payment
Future payments converted	E F	E

F Example text

"We've worked out you're owed a back payment of £xx.xx to cover the pension you should have received up to now. This includes all the interest you're due at the rate of [x% a year]. We'll add this to your next pension payment as a one-off cash sum."



Non-pensioners (deferred and active)

Your message to pensioners and beneficiaries in payment will depend on the method you're using for GMP equalisation.



If you're using a Dual Record method

You're unlikely to write to deferred and active members in bulk regarding their personal benefits in relation to GMP equalisation, but you may want to include some brief information in your general communications such as annual benefit statements or retirement and transfer quotations.

You may say something like this:

Example text

"We check the amount of your benefits before you retire to make sure they are calculated fairly compared to someone of the opposite sex. This process is called GMP equalisation. If you want to know more, you can read more on our website."

And if you're showing figures you should be clear if the values are equalised or not, so you could say something like this:

Example text

"The values shown for your benefits have/have not been equalised."



If you're using the conversion method

Once you've completed the consultation, you'll need to write to people to let them know how it affects them (including, where benefit changes are being made as part of the conversion process and how these changes affect their entitlement).

As mentioned earlier, in this Guidance we haven't covered your consultation materials. Each scheme will have its own requirements and you'll need to talk to your own advisers.

Example text

"We wrote to you a while ago about a process we've had to go through called GMP equalisation and our proposal to convert the GMP part of your pension. The consultation is now finished and we're going ahead with the conversion. This makes it simpler for the scheme in the future.

If converting in bulk

This means we'll now convert the GMP part of your benefits and update our records. We won't need to write to you about GMP equalisation again.

If converting at retirement

This means, when you come to take your benefits we'll convert the GMP part of your benefits and update our records. In the meantime, if we need to carry out any further assessments, we will write to you about it again."



People who've transferred out

PASA's GMP equalisation Supplemental Guidance on Transfer Payments (available at <https://www.pasa-uk.com/wp-content/uploads/2021/08/GMPE-Transfers-Guidance-FINAL.pdf>) provides more commentary about how you might apply GMP equalisation for members who have transferred out of your scheme.

From a communications perspective, you can use the general principles and examples we've outlined in this Guidance as a useful reference when communicating to individuals who have transferred out.

Some challenging details your communicator will need to address

There are some details you will need to plan for in the variations of your communications:



If you take the conversion route you will need to consult members of the proposed change. It is unlikely at this stage you will be able to share with an individual the impact of the proposed change on them using their data. You may need to use an example scenario to help people understand how it might affect them. The focus will need to be on the value of benefits.



Forfeiture clause in scheme rules – members have a right to claim any time they think their benefits are incorrect, but there is often a maximum period in which they can do so. If you are not relying on a forfeiture clause there is nothing to say in your GMP communications. If you are, then you will need to inform people of how far back you are looking when calculating the benefits they are entitled to. Forfeiture clauses do not apply where a member has transferred out.



Lifetime Allowance – consider how you support members, how are they likely to be affected? If you have members with tax protection and you are using the conversion method, your advisors may be advising you to use a dual record basis as it would mean they lose protection. For all members you may want to consider signposting to information on IFAs who can support with personal tax affairs.



There may be some people who have pre and post 1988 tranches of GMP. If you are using the conversion method you will be converting all of a member's GMPs. You may want to explain to people how their pension is made up in detail, or you may prefer to refer to GMPs as a more general group. You can refer to **page 3** where we set out a key principle of layering information to avoid excessive detail.

7 Planning for data to use in communicating

When it comes to the practical matter of producing and sending communications, the availability of data is essential. Planning upfront and early in your GMP project for where this data will come from and who has the responsibility for providing it will make communications production simpler at the implementation stage.

You may find it useful to ask yourself:

Is your communication relevant to all your scheme members? If not, which different groups do you have and why are they in different groups? Which data field will determine which group they are in? Do you have the contact details you need (which could be a home address or an email) and if not, how can you get it?

Is your communication personalised with data other than name and address?

Do you know which data items you will need to create your communication?

Where is your data going to come from in order to produce personalised communications? Will it come from your administration database or a separate actuarial calculation database or both?

Who in your project is responsible for providing data which can be used for communications?

Can your communications data be extracted at the 'push of a button' or do you need a new report or method to provide correct data?

Do you have a way to manage changes in membership status if there is a time lag between extracting data and using for communications? E.g. deaths, movements from deferred to retired status?

For a future audit trail, how will you know which member has received which communication and what personalised data it contained?

Where will you store a copy of the communication outputs?

Does your equalisation project plan have task lines for data needed for communications?

- ✓ Finalise data requirements for communications (this should be done at the very early planning stages of the equalisation project as data may need to be generated specifically and come from more than one source)
- ✓ Agree ownership and source of data for communications
- ✓ Provide date for communications (there may be several sub-tasks to this milestone if the data is from more than one source, to make sure data production for communications is correct)
- ✓ Test communications outputs to data supplied (typically two owners: data owner, communications production owner)
- ✓ Check whether data will be in a common format from multiple sources e.g. with £ or without £

You can use this check list in your planning for data.



Top tip: Clickable interactive checklist

Checklist - planning for data to use in communicating

Materials	Requirement	Location of data	Data readily available
Segmentation of members	Identification of groups of members needed for communications planning. Which data items will identify which group a member is in?	Administration platform? Actuarial database for calculating GMP?	Bespoke report required?
Addressing data	Needed to post or email communications, segmented	Administration platform? Email mailing database? Other?	Yes, extract already available at the 'push of a button'
Personalisation of membership data	Needed to show individual's specific information about their scheme membership	Administration platform? Actuarial database for calculating GMP?	Bespoke report required?
Personalisation of values data	Needed to show individual's specific values	Administration platform? Actuarial database for calculating GMP?	Bespoke report required?
Programming criteria	Not displayed for individuals but needed to drive variable content	Administration platform? Actuarial database for calculating GMP?	Bespoke report required?

8 Post equalisation

It may be helpful to refer back to section 6 of our Early Planning Stage guidance.

The section was subtitled “communications checklist” and the opening paragraphs and the checklist itself should be just as helpful at this implementation stage:

- This checklist is to help industry professionals and trustees of ongoing schemes ensure they have reviewed all appropriate documents which include information relating to Guaranteed Minimum Pension (GMP) or may need to change in light of GMP Equalisation. By GMP Equalisation we mean the effect of equalising for GMPs.
- This doesn't mean all these materials have to change, but you should look to review them. These documents may exist in many places, and this checklist is designed to help you locate and track changes to your affected materials. You will need to revisit this checklist as your GMP Equalisation project progresses.



Top tip: Clickable interactive checklist

General scheme information

Materials	Word/PDF	Print/stock	Intranet	Flex platform	Scheme web-site	Secure online member area	Admin team	Trustee portal
Member booklets								
Member guides (such as on LTA, AA, Scheme Pays)								
Member websites (including any modellers or calculation functionality)								
Scheme apps (including any modellers or calculation functionality)								
Explanatory videos/animations/presentations								
Trust Deed and Rules								

Ongoing member communications

Document	Word/PDF	Print/stock	Intranet	Flex platform	Scheme web-site	Secure online member area	Admin team	Trustee portal
Benefit statements								
Pension Increase letters								
Newsletters								
Summary Funding Statement								
Annual Report and Accounts								
Member engagement material								

Admin and process communications

Document	Word/PDF	Print/stock	Intranet	Flex platform	Scheme web-site	Secure online member area	Admin team	Trustee portal
Leaver packs and leaving statements								
Transfer Out packs (including guides, discharge forms, and divorce quotes and settlements)								
Transfer In correspondence, quotes and settlements								
Retirement Quotation and Settlement packs								
Trivial Commutation Quotation and Settlement letters								
Serious ill health lump sum correspondence								
Death Benefits communications (including dependant beneficiaries)								
“Value of Benefit” quotations								

Generally, equalisation implementation will need all ‘warnings’ introduced at the planning stage to be removed.

The detailed changes which need to be made to communication materials will depend on what methodology or methodologies you use to equalise for the effects of GMP.

Full conversion at a given date, where all pre and post May 1990 GMPs are converted to scheme pension, is the only method which would lead to removal of all references to GMP.

Some schemes may choose to use conversion for the majority of members and dual records for others such as those at risk from excessive tax charges. Despite the complexity of information required for the communications, we recommend after implementation the information sent to people is as simple as possible.

There will often be instances where benefits are still to be altered where you may have, and will need to keep, ‘warnings’ in your regular communications about potential future changes to benefits.

Given the complexities implementation may require, trustees may wish to consider developing a suite of GMP only communication giving varying layers of detail and available ‘on demand’ to accommodate the engaged members who have detailed questions.

In summary:

- ✓ Give yourself sufficient time to plan and check everything
- ✓ Keep your communications as simple as possible



GMP equalisation may
be very complicated but
your communications
don't need to be.



Get in touch:

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