❯ **Summary**
■ Since 1 October 2004, occupational pension schemes have fallen within the duty of employers to make 'reasonable adjustments' to avoid discrimination against disabled employees. That could include communications or administration systems that are not accessible to employees.
■ To cater for members with sight loss, large font texts, audio CDs or Braille could be provided. For those with some form of hearing loss, speaking loudly and clearly on the phone could help, as well as implementing a direct text service. Translated documents could be available to non-English speakers and systems put in place for vulnerable members, such as those with learning disabilities.
■ Once a member requests communications in a different format, trustees should find out what provisions have been put in place in the member's workplace. Administrators should also have a number of services to cater for their needs.
■ Cost is a difficulty trustees face when reformatting communications, particularly due to the potentially low numbers utilising the different format.
■ An increase in requests for documents to be translated is already occurring. The number of people with a disability, such as hearing or sight loss, is expected to increase as the population ages.
■ Placing communications in different formats online and ensuring messages are kept as simple as possible can help with increasing accessibility for all members.

Speaking to everyone

❱ **Laura Blows looks at what the pensions industry is doing to make communications accessible for all**

CAPITAL LETTERS. Bright colours. Exclamation points!!! There are many tips and tricks, such as the above, to make pensions communications – typically considered a very 'dry' subject – appear a more enticing read.

But before artistic flair can do its work, the member needs to clearly and easily access the information provided.

However, there are two million people in the UK with sight loss. One in six have some form of hearing loss. Nearly a million adults have a learning disability and over a million do not speak English well *[see box out]*.

The importance of pensions saving is a message that needs to be heard by all. And as auto-enrolment continues to increase the number of working adults saving into a pension, the industry needs to ensure that everyone is able to communicate and engage with retirement saving effectively.

Varieties
There are plenty of tools at its disposal to achieve this. For instance, those with sight loss could receive either text with a large font size, audio CDs or Braille, as required. Alternatively, pension administrators may simply need to speak loudly and clearly on the phone to people with partial hearing loss, or offer a direct text service for customers with specialist text-phone equipment. Translated documents could be provided to non-English speakers and systems put in place for vulnerable members, such as those with learning disabilities.

"When considering the appropriate *[communications]* mix for the generality of scheme members, careful thought should be given to the proportionate way in which special needs might be met," BESTrustees chair Alan Pickering states.

Large text is the most common adaptation, Pensions Administration Standards Association (PASA) chairman Margaret Snowdon says, as it is the easiest to produce. "I have seen the occasional special language versions, such as Urdu, and some help desks offering support for the hard of hearing and providing a service via a carer for more vulnerable customers," she adds.

Requests for Braille documents are exceptionally rare, so outside

organisations are used to produce this when required, Barnett Waddingham partner Andy Greig says. More common situations, he adds, include receiving calls via text relay or speaking with raised voices on the telephone for the hard of hearing.

Barnett Waddingham is also well versed in legalities of the use of third-party authorities, such as powers of attorney, court protection orders and letters of authority, being used to manage a member's pension matters.

According to Royal London director of policy Steve Webb, along with providing large print and Braille communications, "the other thing we offer is audio files – eg an audio CD – where appropriate".

For Like Minds senior communications consultant Trevor Rutter, language translation can be an area of potential need, for example in schemes with a high proportion of Welsh-speaking members.

Managing needs

If alternative communication methods are required, it is usually down to the individual member to get in touch.

"Drilling down to the needs of individuals needs to be a bottom-up approach, rather than top-down, because the needs of people with a common handicap will vary. For instance, from the perspective of a visually-impaired person, some may want Braille, others large print. We *[trustees]* can't determine how to meet those needs but we must be willing to meet those needs in a proportionate manner," Pickering says.

When this occurs, the first step is to contact the member's employer to establish what adjustments the company has made to assist their work and then 'piggyback' off this, Pickering suggests. "It really is a case of not trying to reinvent the wheel, but to build on whatever adaptations are already in place," he says.

Once it is known what

requirements are needed, conversations should be had with third-party suppliers, such as administrators, to see what they can offer off the shelf, Pickering continues.

Since 1 October 2004, occupational pension schemes have fallen within the duty of employers to make 'reasonable adjustments' to avoid discrimination against disabled employees. The duty to make 'reasonable adjustments' applies where a practice or physical feature puts a disabled person at a disadvantage compared to someone not disabled, Eversheds Sutherland pensions group partner Hugh Gittins says.

"That could include communications or administration systems that are not accessible to employees who are, for example, blind or deaf. In these circumstances, the person responsible for the practice or physical feature is under a duty to take reasonable steps to avoid the disadvantage – so in the context of pension scheme communications that might mean providing written materials in braille form, or an alternative means of accessing information where it is being presented orally," Gittins explains.

Difficulties

But according to Snowdon, it is uncommon for pension schemes to seek information on special requirements for members in advance. This may be due to the difficulties that can arise when adapting documents and services.

"It is expensive to vary offerings (except online) if there would be very limited take up," Snowdon notes. However, "public-sector schemes and insurers tend to have a little more flexibility in how they communicate with members", she adds.

Rutter notes that language translation can be an expensive activity, and also a risky one.

"As an industry we struggle to make our own native language understood by the majority of members at the best of times, so ensuring other language

versions are accurate and intelligible is probably a challenge that few organisations relish," he states.

Pickering agrees that budgetary constraints play a part – how much the scheme can realistically afford to tweak communications affects its response. For instance, "if a scheme has one Czech language speaker, we can just give them a ring, but if we have got 50 Czech speakers we've got to do something different", he explains.

Another issue is that special requirements are just not that common.

In over 30 years of working within the pensions industry, the specialist communication needs of disabled and foreign language workers have rarely been part of his companies' briefs, Rutter states.

Trafalgar House director Dan Taylor's experience is much the same, only recalling two occasions where specialist communications were at the forefront of the trustees' focus when selecting an administrator – and even then the sponsors in these instances were charitable organisations that delivered services to partially-sighted people or were affiliated with those types of organisations.

"Everything we get asked about is to do with design and clarity of voice, but very rarely do we ever get any questions about any special requirements members may have. These requirements should be asked about more than twice out of approximately 500 clients – it does not seem representative of the number of people with accessibility issues," he says.

Increasing focus

So, these requests may be rare and not at the forefront of thinking for those managing pension schemes at the moment. But accessible communications may well climb higher up the agenda in the near future.

Already, in recent years, Barnett

Waddingham has noticed an increase in requests for documents to be translated. "It is easier for the translation of generic scheme documents or the webpages to be done," Greig says. "It can be more difficult to address queries raised on a case-by-case basis."

The health status of members could also make accessible communications for all an increased priority. For instance, according to the Royal National Institute of the Blind, 2.25 million people in the UK will have sight loss by 2020, compared to the two million now, due to the country's ageing population. Hearing loss is set to increase from the 11 million people currently to 15.6 million by 2035.

"As the population ages and declines in health there will be a greater need for special access. Schemes should think about this sooner rather than later and perhaps choose an administrator who can help," Snowdon suggests.

Proactive
Some are, or already have been, taking a proactive approach.

Pickering recalls The Pensions Trust (TPT)'s scheme manager approaching him "at least 20 years ago" to discuss how TPT could improve its services to members with sight loss, knowing that he had a visual impairment. "So there are schemes that have been managing this for a long time," Pickering says.

"TPT Retirement Solution's heritage means we administer schemes for charities linked to supporting deaf and blind people so we have deep experience and understanding of helping this type of customer," TPT head of pensions administration Andrew Marson says.

Along with making large text documents, Braille and audio statements available for those that need it, TPT also trains its staff in the appropriate speed and clarity to speak when members are using transcription software or hearing enhancement devices.

TPT also puts notes on member records as to the best way to contact them, as does Barnett Waddingham, which includes information on their records such as the font size they require for communications.

"For one of our pensions administration clients, the trustees request we send all documentation in a specific font and point size to help people with sight difficulties or other reading problems. We also provide them in larger fonts upon request and have a dedicated helpline for the scheme in order to explain or read communications to the member," Greig says.

For many years now Prudential has been offering a direct text

> **Case study: JLT and RNIB**
Eighteen months ago, the RNIB Retirement Benefits Scheme (the scheme for employees of the Royal National Institute of Blind People and Action for Blind People) set out to find a new pensions administrator that could handle the needs of its many sight-impaired members, along with the challenge of administrating a scheme with a combination of pure DB and DB-DC hybrid members.
JLT was appointed its administrator and worked with RNIB to ensure its communications were accessible for all.
The company soon discovered that members may need different formats, even within the same method of communication. For instance, documents were required in a variety of typefaces, font sizes and media. It also found that not all people with visual impairment can read Braille, and that Braille comes in two types – simple and advanced.
JLT reformatted its letters to become screen-reader friendly, so that a blind or visually-impaired person can use a computer to read text that is displayed on a screen with a speech synthesizer or Braille display.
This still provided some challenges to overcome though, such as members with old computers or no Microsoft Office struggling to access the documents sent. However tablets do cater for visually-impaired users via its accessibility settings, JLT Employee Benefits director Mark Adamson notes.
Another requirement RNIB had of JLT was to record on its systems the requirements of each of the 10 per cent of members who needed non-standard communications. Commenting on the working relationship, RNIB group director of resources Rohan Hewavisenti says: "Our demands are very different from those of a typical scheme and so the transition was full of challenges for all parties. A year on, we are very satisfied with our new partner."

> **Case study: Prudential's BSL service**
Prudential recently became the first retirement product provider in the UK to provide a web-based video relay service (VRS) for customers that use British Sign Language (BSL).
Through a link on Prudential's website, BSL-using customers place a free call to a BSL interpreter, who then makes a voice call to the company, with the interpreter relaying the conversation in real time between the two parties.
"The setting up of the VRS is an encouraging step towards our wish to see full access for deaf people across all services in the UK," British Deaf Association chair Terry Riley says.
The service was launched in October 2016, with the idea originally coming from the company's employee portal platform, where staff share thoughts for improving customer service.

service, with its teams specifically trained for managing calls that come through NGT (Next Generation Text, formerly Type Talk).

Also, Old Mutual Wealth has a vulnerable client policy, which helps its employees recognise vulnerable customers.

"Vulnerability can come in a range of guises, and can be temporary, sporadic or permanent in nature. Sometimes a vulnerable customer would not consider themselves to be vulnerable so it is important for us to be able to identify potentially vulnerable circumstances and to ensure that we are providing an appropriate service to them," Old Mutual Wealth pensions technical manager Jon Greer says.

Greig agrees that administration staff training is the most vital aspect of ensuring all customers can be helped. But another approach is to send surveys to scheme members, as it may highlight any difficulties members have in accessing or understanding pensions communications, he suggests.

Online services can provide a number of ways to incorporate special requirements, be it through the inclusion of video with subtitles, uploading different language documents or simply enabling the member to adjust font sizes on the screen for themselves.

JLT is utilising technology-based initiatives such as web chat, which can help members with a disability. Speech-enabled text can assist those with a physical disability relating to use of hands etc, JLT Employee Benefits director Mark Adamson says.

Online communications can also be mutually beneficial, as many schemes are looking to drive member engagement online, Taylor notes.

However, the move to online is not the only pensions trend occurring that may inadvertently benefit those with particular communication needs.

Calls for diverse trustee boards can be another way that specialist requirements is brought to the attention of trustees, as "those trustees may be working at the coalface with folks with disabilities", Pickering says.

Also, as Rutter says: "A growing number of schemes are focusing on simplifying their messages and making better use of images to engage with members, and this is obviously of particular benefit to those with a limited command of English."

'Keep it simple' is good advice for all communication, regardless of whether the recipient has any special requirements to be able to access the message. It can also be a useful approach to take when determining approaches to ensure pensions communications is available for all. A simple place to start, Pickering says, is just to "put yourself in the place of those on the receiving end of the communications".

> **Written by Laura Blows**

> **In numbers**
- Over 11 million people have a long-term illness, impairment or disability in Great Britain *(Office for Disability Issues and the Department for Work and Pensions Inclusive Communications Guidance, August 2014).*
- More than a million people in England and Wales cannot speak English well or at all. One in 13 people (8 per cent of the population) have a main language other than English. Polish is the most common language other than English, followed by Panjabi and Urdu *(ONS, 2011).*
- Two million people in the UK – one in 30 – live with sight loss. This is expected to rise to 2.25 million by 2020 and to four million by 2050. Braille is the preferred reading medium for around 18,000 blind and partially-sighted UK adults *(RNIB).*
- Approximately 358,000 people in the UK are deafblind; 222,000 of which are aged over 70 and 115,000 aged between 20 and 69 *(Sense).*
- More than 11 million people in the UK have some form of hearing loss, which is one in six of the population. By 2035, it is estimated that this will rise to 15.6 million. More than 70 per cent of over 70 year-olds have some form of hearing loss *(RNID).* Approximately 22,000 people use British Sign Language as their first language *(Census 2011).*
- It is estimated that 930,400 adults in England had learning disabilities in 2015 *(BLID).*

> **Recommendations**
The Office for Disability Issues and the Department for Work and Pensions' *Accessible Communication Formats, August 2014,* provides a number of recommendations for ensuring communications are easy to read and accessible to all. Its advice includes:
- Consider target audience preferences – eg younger deaf people may prefer text messages.
- Use a minimum of 14 point text size.
- Avoid background noise and music with audio files.
- Make sentences active, not passive.
- Do not use acronyms.
- Use pictures to support the text meaning.
- Ensure the text colour contrasts well with the paper.
- Avoid using italics.
- Use cream or off-white non-glossy paper to reduce glare.