

**Comments Template on
CP-15-011**

**Good Practices on Communication Tools and Channels for communicating
to occupational pension scheme members**

**Deadline
22 March 2016
23:59 CET**

Name of Entity:	OPSG	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. Please indicate if your comments on this CP should be treated as confidential:	Confidential/Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Please insert the name of your entity in the box next to "Name of Entity". Please also specify the sector of your entity in brackets (Consumer Associations, Training/Education bodies, Industry), as well as your Country. ⇒ Please fill in your comment in the relevant row, giving reference to the page/Good Practice/Question to stakeholder number where given. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>. ⇒ <u>Do not change the page numbering</u> in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool. ⇒ Leave the last column <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>Please send the completed template, in Word format, to CP-15-011@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the pages/Good Practices/Questions to stakeholders refers to the Consultation Paper on Good Practices on Communication Tools and Channels for communicating to occupational pension scheme members.</p>		

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Reference	Comment	
General Comment	<p>Good practices on communication tools and channels can be an incitement for IORPs and insurance undertakings operating occupational pension schemes to develop and improve their own communication.</p> <p>OPSG finds that the value of good practices on communication tools and channels for communicating to occupational pension scheme members would be improved if followed up by good practices on the content of the communication and not only the tools and channels.</p> <p>OPSG hopes, that the information about what is going on in the Member States, the literature, the case studies and the reports in the annexes about recent development can serve as inspiration for the Member States, the IORPs and the insurance companies.</p> <p>Regulations and communication strategies should all serve the same purpose, giving scheme members the information they need about their own occupational pension scheme in an economically sound way and do it by using communication tools and channels adapted to suit the members and the information content.</p> <p>The majority of citizens find it difficult to understand and react to information about pensions. OPSG finds that it would be a help if information on all the individual's pensions (first, second and third pillar) can be obtained from a central source or from one entry point. The same applies for information on the individual's pensions obtained in different Member States.</p>	
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Page 9	OPSG finds that an extra criteria should be added : Size of class of non-reacting members. The good practices, the communication strategy might be working well for the majority of members, but how big is the group of non-reacting members and has the group any special characteristics in addition to being non-reacting.	
Page 10	The term « hard-to-reach members » can be found in the definitions, but it is not used in the CP. Hard-to-reach members are part of the class of non-reacting members, but defined by being hard to reach. Other members of the class of non-reacting receive the communications, but they are not reacting.	
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Good Practice 1	<p>Much of the research referred to in the Consultation Paper shows how difficult it is for scheme members to read, understand and react on communication related to pension savings. When different bodies communicate to members with parts of the full information it can be difficult for members to mobilise their attention to all parts of the communication or to find the (most) important information.</p> <p>A coherent communication strategy for all relevant entities could give members a better comprehension of where to look and when to be alert.</p>	
Good Practice 2	<p>Many people have difficulties organising their own files with messages concerning pension schemes. The increased use of electronic communication makes many people uncertain. Was that information on paper or electronic, is it possible get old paper information in an electronic format and how to store information.</p> <p>Storing of all communication with scheme members in one (online) platform with online access for members can help members able to search for information online to selfservice and it will facilitate support to members who cannot serve themselves in the electronic world.</p> <p>Members will need information about all occupational schemes of which they are members and of other pension schemes (pillar one and three, domestic and foreign). The different systems should be able to work together or be accessed via one platform.</p>	
Good Practice 3	<p>An employer platform combining information on pensions and related Human Resources matters can be helpful for members. It would be good if such a platform gives information about the total information picture and how to find the information that is not on this platform.</p> <p>It is important, that members who are not actual employees of the company (deferred workers holding vested entitlements as well as beneficiaries) can have access to the information.</p>	
Good Practice 4	<p>Pension calculators is a fine tool for members. They shall also cover pensions for other persons than an actual employee and be accessible for these groups of members.</p>	
Good Practice 5	<p>We know that scheme members allocate very limited attention to information on pensions. A tracking service that can be used as communication channel for alerts or notification when new</p>	

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	information becomes available can activate members.	
Good Practice 6	We must evaluate all our activities. The effectiveness of a communication strategy should also be evaluated. Special attention should be given to what is not working : members not reacting when they have to make decisions. The development in communication tools and channels and the use of the different tools and channels should be monitored.	
Good Practice 7	OPSG finds it important to use a multi-channel strategy adapted to the content of the communication. It is important that different tools and channels cross-refer to each other in order not to leave members in a situation where they think that the information they get through one channel is the full information.	
Question 1 to stakeholders	OPSG finds the three criteria appropriate but wants to add as an extra criteria : size of class of non-reacting members.	
Question 2 to stakeholders	Size of class of non-reacting members should be added as an additional criteria. The level of engagement of the reacting members can be high and that is good, but how large is the group of non-reacting members, is it characterized in any way ?	
Question 3 to stakeholders	The Good Practices outlined in the CP are good and they will be a good support when making the communication strategy. Especially good practice 7 (multi layer strategy) can be a good approach providing for the possibility to stay in contact with the members via different communication tools. The challenge is still the non-reacting members, members that are not at ease with written information on paper or electronically, members who are no longer employed by the company, who have moved or are in bad health, family to a deceased member etc.	
Question 4 to stakeholders	For legally binding information, basic information about the scheme and the rights and obligations of members is proportionality not applicable. That information must be given regardless of the number of members of the scheme, if it is a single-employer or multi-employer scheme. As far as tools and channels are concerned can proportionality be employed unless legislation has provided special tools or channels.	

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Question 5 to stakeholders	Ensuring that information has been understood requires direct contact to a sample of members. An easy check is to count the percentage of reactions to questions posed /choices to be made.	
Question 6 to stakeholders	With digital tools one can track the clicks on the internet. For example the time spent on certain parts of the tool says a lot about the use. One can also use different templates for the same message and test the relative difference between the different templates. This is applying what many commercial websites are doing and what some of them are really very good at. One can also review actions from members as a result of communication e.g. if a communication is issued about new fund choices and no member uses the new fund choices, then the communication probably has not been suitable.	
Question 7 to stakeholders	We have to accept that (improving and stimulating) communication is an ever ongoing process, but that we will never reach a state of ultimate pension interest or awareness. Pensions were and are a low-interest product concerning risks (of growing old, dying and being invalid to work) that we rather not think about as human beings. Communication should be a multi-layered discipline to attract more attention from participants. The messages have to be constantly brought to the participants by different means. An important realisation and in the Netherlands introduced in 2015 best practice is to vary in the depth and detail of the information that is given. The Pension 1-2-3 is the perfect example of that. When starting in a pension scheme the participant gets his/her information in 3 layers. The first layer is simple short information accompanied by icons (images) that visualise the information. The second layer gives more detailed information about the text/icons in the first layer but has to be sought by the participant. The third layer (on the website or through questions of the participant) contains very detailed information. An important factor this is the use of icons (pictures) to visualise. The second best practice is that information (also) visualised instead of only using words and numbers. Many people think and see in images (moving or still).	
Question 8 to stakeholders	The Good Practices are all seen from the IORP, the insurance undertaking or the employer. An additional Good Practice could be to look at the information tools and channels from the position of the member. Asking about hard to reach information, not hard to reach members.	

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Question 9 to stakeholders	Good Practices 2, 3, 4 and 5 are elements of the information system for the future. Added should be information on the individual's other pension schemes, pillar one and three, domestic or foreign.	
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