International Organisation



# of Pension Supervisors

# Supervisory Education, Outreach and Communication, Including Training of Trustees

Retirement Benefits Authority, Kenya The Pensions Board, Ireland Financial Services Board, South Africa The Pension Regulator, UK

> Working Paper No.2 1 August 2007



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THE INTERNATIONAL ORGANISATION OF PENSION SUPERVISORS

## **RETIREMENT BENEFITS AUTHORITY, KENYA**

## THE PENSIONS BOARD, IRELAND

## FINANCIAL SERVICES BOARD, SOUTH AFRICA

## THE PENSION REGULATOR, UK

Working Paper No. 2 1 August 2007

Supervisory Education, Outreach and Communication, Including Training of Trustees

This paper collects information about the purposes, structure and operation of education programmes carried out by pension supervisors. It examines countries which do carry out education as well as those that do not and attempts to draw inferences as to the pension system and economic characteristics of a country that may influence the type and level of supervisory education provided by pension supervisors. The variety of education programmes and their effectiveness, and any impact they may have had on supervision and compliance are also examined. In addition the paper suggests further research. The Appendices of the paper detail the education programmes carried out in the countries covered by the report, together with a further assessment of their effectiveness and impact.

Keywords: pension, supervision, education, outreach, communication, training, trustee

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# Table of Contents

1.0	Introduction	7
2.0	Executive Summary	7
3.0	Literature Review	10
4.0	Comparison of Supervisory Education in IOPS Member Countries and Evaluation of the Effectiveness and Impact	
	of Pension Supervisory Education	11
4.1	Methodology	11
4.2	Countries Providing Supervisory Education	11
4.3	Target Groups	15
4.4		
4.5	Technical Guidance Services	
4.6	Trustee /Fiduciary Support Services	20
4.7		
5.0	Conclusions and Lessons Learnt	22

# Appendices / Case Studies

Appendix 1. Ireland Case Study	
1.1 Introduction	
1.1.1 The Pensions Board	
1.1.2. Supervising the Act	
1.2 The Pensions Board's role in the provision of pension education, outreach	
and communication	
1.2.3 Technical Guidance Services	
1.2.4 Information Services	
<ul> <li>1.1 Introduction</li></ul>	
Appendix 2. Kenya Case Study	
2.1 Introduction	
2.2.1 Trustee Education	
2.2.2 Member and Beneficiary Education	

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2.3 Impact of Education	
2.3.1 Impact of Trustee Education	
2.3.2 Impact of Member and Beneficiary Education	
2.3.3 Impact of Education of Other Groups	
2.4 Conclusion	
2.1 Conordston	
Appendix 3. South Africa Case Study	
3.1 Introduction	
3.2 Legislation	
3.3 Consumer Education	
3.4 Types of Education	
3.4.1 Formal Education	
3.4.2 Community Education	
3.4.3 Intended Outcomes	
3.4.4 Strategic Partners	
3.4.5 Assessment of Consumer Education	
3.5 Conclusion	44
Appendix 4. United Kingdom Case Study	
4.1 Introduction of e-learning for pension scheme trustees by the UK Pensions	
Regulator - Executive summary	
4.2 Background	
4.3 Purpose of the e-learning programme	
4.4 Implementation	
4.4.1 Content	
4.4.2 Options for delivering the learning which trustees might require	
4.4.3 E-learning	
4.4.4 E-learning delivered by the regulator	
4.4.5 Marketing the programme	
4.4.6 The potential risk of this initiative to other training providers	
4.4.7 The risk that the regulator might make undue use of information	
about the progress of trustees in their learning	
4.5 Evaluation	
4.5.1 Evidence of enthusiasm for the programme in advance of its launch	
4.5.2 The credibility and quality of the material	
4.5.3 Outside agencies with an interest	
4.6 Gathering evidence for evaluation in the future including target setting	
4.7 Conclusion	
Appendix 5. Questionnaire	53
Survey Questionnaire: Comparison of Supervisory Education in IOPS Member Countries and Evaluation of Effectiveness	
and Impact of Pensions Supervisory Education	54
and impact of i choice ouper theory Education	

4

# **Charts**

Chart 1.	Supervisors Offering Information through Various	17
Chart 2.	Channels of Assessment of Effectiveness of Information Services	17
Chart 3.	Supervisors Providing Technical Information through Various Channels	
Chart 4.	Channels of Assessment of Effectiveness of Guidance Services	19
Chart 5.	Fiduciary Support through Various Channels	20
Chart 6.	Channels of Assessment of Effectivenessof Trustee Support Services	20
Chart 7.	Method of Training Needs Assessment	

# **Tables**

Table 1.	Questionnaires Received	11
Table 2.	Summary of Supervisory Education	12
Table 3.	Type of Occupational Retirement Systems	12
Table 4.	Methods of Implementing Voluntary Complementary and Private Pension Plans	13
Table 5.	Weight of Pension Funds in the Economy and Financial Markets	14
Table 6.	Supervisory Education Services Provided by Country	15
Table 7.	Regulatory Scope	16
Table 8.	Bearer of cost of Technical Guidance Services	19
Table 9.	Bearer of cost of Trustee Support Services	21

### 1.0 Introduction

This paper is part of the programme of work of the International Organisation of Pension Supervisors (IOPS) and is aimed at collecting information about the purposes, structure and operation of education programmes carried out by pension supervisors. Section 2.0 of the paper begins by providing the Executive Summary, while Section 3.0 reviews the existing literature in the area of supervisory education, outreach and communication, although this literature is extremely limited.

Section 4.0 summarises supervisory education activities in IOPS member states. It examines the countries which do carry out education as well as those that do not and attempts to draw inferences as to the pension system and economic characteristics of a country that may influence supervisory education. The section further examines the variety of education programmes and their effectiveness, and any impact they may have had on supervision and compliance.

Section 5.0 draws conclusions and lessons learnt and makes some suggestions for further research. The Appendices of the paper contain case studies of supervisory education in a number of countries. The case studies examine in detail the education programmes carried out in each country, together with a further assessment of their effectiveness and impact.

This paper has been prepared by a project team consisting of the following IOPS member organisations:

- 1. Retirement Benefits Authority Kenya
- 2. The Pensions Board Ireland
- 3. Financial Services Board South Africa
- 4. The Pensions Regulator United Kingdom

### 2.0 Executive Summary

Although literature on the provision of education by pension supervisors is limited and the nature of supervisory institutions and pension systems differs, the information collected in the course of this study presents a valid case for the provision of supervisory education.

Data collected through the analysis of questionnaires, and the case studies presented by the 4 members of the project team indicate that there is not only a great need for supervisory education, but also that the provision of this education impacts positively on the pension industry. However, it should be noted that in countries where there is no or very limited involvement in supervisory education activity there is nonetheless a demonstrable requirement for those involved to be fit and proper (so that providing pension education by the supervisor would contradict the legal requirements which have to be fulfilled ex ante).

The data provided does not exhibit significant differences between the scope or impact of outreach and communication provided by regulatory institutions that provide education as a legislative requirement, and those that provide education voluntarily. There is also no evidence that the absence of a specialised regulatory agency negatively impacts the provision of supervisory education in a country.

The study concludes that the provision of supervisory education has not only led to increased pension scheme compliance with legislation, regulation and other requirements, but it has also led to:

- Better understanding, by stakeholders, of what is expected of them;
- Improved interaction between supervisors and stakeholders;
- Better managed schemes;
- Better returns for members;
- Increased confidence from members; and,
- Greater take-up of pension savings by all groups of individuals.

It was also found that the provision of supervisory education can be used to address the challenges of compliance and coverage, and is therefore an efficient way of promoting the development of the pensions industry.

Consequently, the lessons drawn from this paper suggest that pension fund supervisors should, where appropriate, be encouraged to:

- i. Provide basic information through such channels as brochures and other promotional material;
- ii. Provide relevant information through their websites, which, throughout the course of this paper, have been identified as cost-effective tools in terms of time and numbers of individuals reached;
- iii. Approve training material offered by other institutions that would seek to complement their work;
- iv. Regularly carry out research to gauge the needs of their target audiences so that they can tailor their educational material to cater for these needs; and,
- v. Educate stakeholders on any regulatory changes affecting the industry, whenever these changes arise.

Further, whereas this paper analyses the provision of education to various stakeholders, and identified a positive impact on all groups trained, it has highlights trustees as the most significant target group for two main reasons:

- The role that they play in the management of schemes; and,
- Their great thirst for, and appreciation of, knowledge regarding their roles and responsibilities as the managers of these schemes.

However, despite this particular need, the case studies and data provided imply that the training of trustees is inadequate, because, firstly, it is not compulsory, and secondly, because it usually involves only one-off training. The majority of trustees are exposed to training in the early periods of their trusteeship, but are often not awarded opportunities for further training. These opportunities remain inaccessible to most scheme trustees because supervisors only offer introductory training, while secondary training opportunities are offered by other organisations, at costs that are unaffordable. Trustees' demonstrated appreciation of training presents a rare opportunity for supervisors, who should therefore be encouraged to bridge the gap between the demand and supply of ongoing training by:

- i. Ensuring that the training provided, especially by the supervisory institution, is affordable to the recipients, because it increases the chances that the education opportunities will be taken up; and,
- ii. Ensuring that trustees, who have been identified throughout this project as major stakeholders in the success of the pensions industry, are trained regularly with up-to-date material, so that they are better equipped to carry out their duties in the management of schemes.

Analysis of the case studies also allows further lessons to be drawn. For example, the costs to supervisory agencies of supplying education can be reduced in several ways. Fit and proper requirements and/ or the requirement to attend certified training courses reduces the need for the supervisor to play an educational role, whilst several agencies have found using their website to provide detailed instruction to be a cost effective mechanism. For example, the UK Pension Regulator's on-line **'**Trustee Toolkit'(www.trusteetoolkit.com) provides one of the most developed on-line education resources for trustees (it is also interesting to note that market research in the UK found that trustees identify the regulator as the preferred provider of learning, and welcome the opportunity, through training, to establish a relationship with the regulator). Supervisory authorities which apply a risk-based approach to supervision (such as in Kenya and the UK) also note that the costs of education should be offset by the requirement for less indepth investigations of funds as risk levels should be reduced with better education and therefore fund management and governance.

Several of the agencies included in the case study also provide good examples of how they have worked with other stakeholders and partners to provide education and awareness, thereby not only spreading the burden of such campaigns but also increasing their reach. A good example is the Financial Services Board in South Africa which, though not providing formal education itself, promotes programmes and initiatives by other financial service institutions and bodies. The Board is part of a working group setting standards for trustee and member training, and promotes consumer financial management in the school curriculum.

The case study of the Pensions Board in Ireland provides interesting examples of how legislation can be used to back up and compliment agencies' education and advisory roles. For example, 'Disclosure and Information Regulations' require that pension funds specifically make reference in their Annual Report as to whether the fund's trustees have access to the Board's Trustee Handbook (which provides comprehensive guidance to trustees, ensuring that they are aware of the duties and standards which are expected of them). This specific reference highlights the importance of the Handbook as the Board's main educational tool, and presumably any declarations of access not being available would allow for further supervisory oversight of a particular fund to ensure that trustees are able to perform their tasks adequately. In addition, the Pensions Act in Ireland states that reasonable costs and expenses incurred in receiving trustee training may be met from the resources of the scheme – which should encourage and allow for the training of trustees in circumstances where the plan sponsor is not willing or able to cover training costs. Likewise, on formation in 2004, the Pensions Regulatory in the UK was backed up

by new pension legislation, requiring trustees to have knowledge and understanding appropriate for their roles and to be familiar with their own schemes.

The Kenyan case study provides a leading example of a highly pro-active approach to education by a supervisor – the Retirement Benefits Authority (RBA). The RBA not only disseminates information, but also carries out regular research to identify and address the needs of target audiences. The identification of problems (including poor investment and administration, excess interference by plan sponsors etc.) allowed the Authority to focus and target its education work on trustees. In addition to providing its own training seminars etc., an interesting example of RBA outreach activities include attending Annual General Meetings to address questions from scheme trustees and members, and providing training to sponsoring employees upon request, even before a scheme is established. The RBA has clearly identified the impact of its educational programmes and established that through improving the quality and professionalism of the pension fund trustees in Kenya the scheme members and beneficiaries themselves are also better informed, which should help combat the sort of fraudulent activity which was able to take place in the past on account of member and trustee ignorance.

The case studies and paper all provide important messages regarding the importance of financial education in relation to retirement and lessons for how pension supervisory authorities can play an important role in improving the knowledge and understanding of all stakeholders in the pension industry.

### 3.0 Literature Review

A detailed search for sources of literature on supervisory education was conducted but little material that would enhance the quality of this report to a reasonable degree was available.

Richard Hinz and Anca Mataoanu, in their paper "Pensions Supervision: Understanding International Practice and Country Context" (World Bank Social Protection Discussion Paper Series No 0524) propose an approach to classifying and measuring the primary elements of private pension supervision and make the point that supervision methods and styles relate to the basic design of the scheme and the environment in which they operate. It draws the conclusion that the nature and extent of the outreach and education programmes reflect the style and approach of the supervision. Supervisory agencies which make few efforts with regard to outreach and education are more directive in nature, relying almost exclusively on action by the supervisor, while supervisors with extensive outreach and education activities place greater weight on the role and action of third parties in the supervisory process. The latter use preventative rather than remedial supervision, because their goal is to educate practitioners and deter problems.

Other literature researched was aimed at financial education for members rather than supervisory education (for example the OECD's 2005 publication 'Improving Financial Literacy: Analysis of Issues and Policy').

### 4.0 Comparison of Supervisory Education in IOPS Member Countries and Evaluation of the Effectiveness and Impact of Pension Supervisory Education

### 4.1 Methodology

Data on supervisory education was obtained from IOPS member countries through a research questionnaire which is attached to this report as Appendix 5. A total of 19 responses were received from the organisations listed in Table 1:

Country	Agency
Australia	Australian Prudential Regulation Authority
Austria	Financial Market Authority
Belgium	CBFA
Bulgaria	Financial Supervision Commission
Germany	BaFin
Ireland	The Pensions Board
Israel	Capital Markets, Insurance and Savings Division - Ministry of Finance
Italy	COVIP
Jordan	Insurance Commission
Kenya	Retirement Benefits Authority
Luxembourg	Conseiller de Direction 1ere Classe
Nigeria	National Pension Commission
Portugal	Instituto de Seguros de Portugal
Republic of Korea	FSS and FSC
South Africa	Financial Services Board
Thailand	Securities and Exchange Commission
The Netherlands	De Nederlandsche Bank
Turkey	Undersecretariat of Treasury+Pension Monitoring Center
United Kingdom	The Pensions Regulator

### **Table 1: Questionnaires Received**

### 4.2 Countries Providing Supervisory Education

As summarised in Table 2, 16 out of 19 supervisors provide some sort of education services. In only 40% of these countries is it a legislative requirement to provide these services, suggesting that many supervisors provide the services in expectation of some sort of compliance or development improvement. Three supervisors, namely those of Germany, Jordan and Portugal do not provide any education services, while the Netherlands and South Africa described the services they provide as very limited.

Question	Number of supervisors		
	Yes	No	
Provide education	16	03	
Provision of education is a legislative requirement	06	09	
Educate plan administrators/managers	13	03	
Educate scheme members/beneficiaries	13	03	
Educate pension practitioners/professional advisors	11	05	
Educate sponsoring employers	09	07	
Educate trustees	08	08	
Educate fiduciaries	03	13	

Table 3 compares the pension systems present in each of the countries, cross referenced to whether they provide, provide limited or do not provide supervisory education services. All the countries for which data is available have voluntary schemes. The 2 countries that also have mandatory schemes provide education services. Of the 14 countries for which the above information was available, all 4 for which provision of education is a legislative requirement have at least two publicly managed systems for retirement income. Germany and Portugal, both of whose supervisors do not provide education, have no mandatory systems for retirement income. Data was not available for Jordan, the third country whose supervisor does not provide education.

Country	Mandatory Occupational Schemes	Voluntary Occupational Schemes	Providing Education	Provision of Education is a Legislative Requirement
Australia	×	×	×	
Austria		×	×	
Belgium		×	×	
Bulgaria	×	×	×	
Germany		×		
Ireland		×	×	×
Israel		×	×	
Italy		×	×	×
Jordan	NA	NA		
Kenya		×	×	
Korea	NA	NA	×	×*
Luxembourg		×	×	
Netherlands		×	× (limited)	
Nigeria	NA	NA	×	×
Portugal		×		
South Africa		×	× (limited)	
Thailand		×	×	
Turkey	NA	NA	×	×
UK		×	×	×

### Table 3: Type of Occupational Retirement Systems

\* Questionnaire response not clear

Sources: Research Questionnaires and IOPS Secretariat

From the data there is no evidence that the particular retirement income system of a country predisposes the supervisor in that country to provide education services. Similarly, the method of implementing pensions systems does not appear to have much bearing on the likelihood of a supervisor providing education services. Although all the countries that have a trust system provide education services, many countries with insurance or other legal entity based systems also provide education services (Table 4).

Country	Pension funds		Insurance	Trust	Providing	
	Legal Entity	No Legal Entity			education	
Australia	×			×	×	
Austria	×		×		×	
Belgium	×		×		×	
Bulgaria	×			×	×	
Germany	×		×			
Ireland				×	×	
Israel		×	×			
Italy	×	×			×	
Jordan			×			
Kenya				×	×	
Korea		×			×	
Luxembourg	×		×		×	
Netherlands	×		×		× (limited)	
Nigeria	NA		NA	NA	×	
Portugal		×	×			
South Africa	×				× (limited)	
Thailand	×				×	
Turkey		x			×	
UK				×	×	

### **Table 4: Methods of Implementing Voluntary Complementary and Private Pension Plans**

Sources: Research Questionnaires and IOPS Secretariat

Another hypothesis that was examined was whether the size of the pensions sector in the economy and in the country's financial markets predisposed a supervisor to carry out education. From the limited information available (Table 5), countries with well-funded pensions systems tend to provide supervisory education. However, there was no clear evidence that the size of the pension sector affected the likelihood of provision of pension education.

Country	Percent Share of GDP	Providing Education
	<b>2005</b> <sup>1</sup>	
Netherlands	124.9	× (limited)
UK	66.2	×
Australia	55.63	×
Ireland	52.8	×
South Africa	33.9	× (limited)
Israel	32.45	Х
Kenya	23.0	×
Portugal	12.9	
Thailand	4.87	×
Austria	4.7	×
Belgium	4.2	×
Germany	3.9	
Italy	2.8	×
Bulgaria	2.69	×
Korea	1.9	×
Luxembourg	0.4	×
Turkey	0.3	×
Jordan	NA	
Nigeria	NA	×

### **Table 5: Weight of Pension Funds in the Economy and Financial Markets**

1. Source OECD

Sources: Research Questionnaires and IOPS Secretariat

The reasons given for not providing education or providing very limited education services by the supervisors were as follows:

- The supervisor was relatively young and planned to begin provision of the services in the future;
- The presence of (an) alternate agency(ies) charged with the mandate of providing the education services; and,
- Managers of pension funds are required to be fit and proper persons, highly diligent and professionally competent. Therefore, providing pensions education by the supervisor would contradict the legal requirements.

Even though these supervisors do not provide education services, all of them provide relevant legal guidelines through their website and publications. Where certain institutions fail to understand their obligations, Jordan holds workshops and seminars and responds to inquiries, while Germany contacts and educates them about the relevant legislation. In certain circumstances, the German supervisory authority, BaFin, also publishes such clarifications in its periodical.

### 4.3 Target Groups

Scheme members and beneficiaries together with plan administrators and managers were the primary targets of the education services offered by supervisors (Table 6). In those countries with Trust systems, trustees were in all cases a primary target for education. Education of professionals and employees was provided by only a limited number of supervisors. The average number of target groups per supervisor is 3.6.

	Provide education	Education required by legislation	Educate plan managers	Educate scheme members	Educate pension practitioners	Educate employers	Educate trustees	Educate fiduciaries
Australia	×						×	
Austria	×		×	×				
Belgium	×	×	×	×	×	×		
Bulgaria	×		×	×	×		×	
Ireland	×	×	×	×	×	×	×	
Israel	×		×	×	×			
Italy	×	×	×	×	×			
Kenya	×		×	×	×	×	×	×
Luxembourg	×		×		×	×		
Nigeria	×	×	×	×	×	×		
Republic of Korea	×	×	×	×	×	×	×	×
South Africa	×		×	×			×	
Thailand	×		×	×		×	×	
The Netherlands	×		×					
Turkey	×	×		×	×			
United Kingdom	×	×	×	×	×	×	×	×
Germany								
Jordan								
Portugal								

**Table 6: Supervisory Education Services Provided by Country** 

Source: Research Questionnaires

Table 7: Regulatory Scope					
Country	Integrated Financial Sector Agency*	Partially Integrated Insurance-Pension Agency**	Specialised Pension Agency***	Provides Education	
Australia	×			×	
Austria	×			×	
Belgium		×		×	
Bulgaria	×			×	
Germany	×				
Ireland			×	×	
Israel				×	
Italy			×	×	
Jordan		×			
Kenya			×	×	
Korea	×			×	
Luxembourg		×		×	
Netherlands	Х			× (limited)	
Nigeria			×	×	
Portugal		×			
South Africa	x (Excl Banks)			× (limited)	
Thailand	×			×	
Turkey		×		×	
UK			×	×	

Regulates Insurance companies and Pension funds and at least one other sector, such as securities or banks
 Insurance companies and Pension funds

\*\*\* Pension funds

Sources: Research Questionnaires and IOPS Secretariat

With the exception of Kenya, countries with specialised pension agencies provide education as a legislative requirement. 5 of the 6 countries with specialised pension agencies provide education for more than the average number of target groups per country. Italy only provides information for 3 target groups.

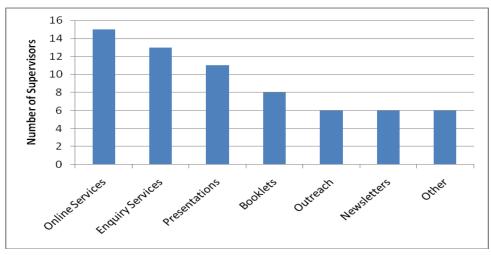
2 of the 5 supervisors with partially integrated agencies do not provide supervisory education, 1 of them provides education as a legislative requirement and 2 provide education voluntarily. The only integrated agency supervisor that does not provide education is Germany.

This information indicates a great likelihood that specialised agencies will provide education, and that this provision will be a legislative requirement. It also shows that the absence of a specialised agency does not impact negatively on the provision of supervisory education.

**16** 

### 4.4 Information Services

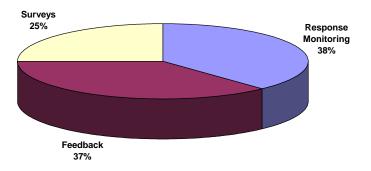
As shown in Chart 1, most pension supervisors use online services, enquiry services and information presentations to disseminate information, while information booklets, outreach programmes and newsletters are not as highly used. All agencies noted that the information they provide is geared at enlightening all their target audiences and clarifying regulatory requirements and issues that are not adequately comprehended.



**Chart 1: Supervisors Offering Information through Various Channels** 

Apart from providing the information, some of the supervisors also assess the effectiveness of the different channels used to provide this information. Feedback from the target audiences and the assessment of the market's response to the information provided are the preferred measures for most agencies.

### **Chart 2: Channels of Assessment of Effectiveness of Information Services**



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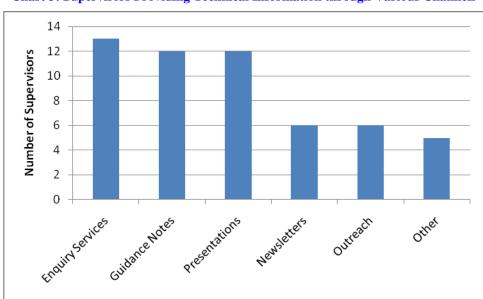
Based on the above assessment methods and/or the supervisors' own analyses, the supervisors find that the provision of information services has been positive for all relevant pensions markets. The impact has been seen in:

- Better informed scheme trustees;
- Better managed schemes;
- Greater transparency in schemes;
- Greater confidence in the retirement benefits industry;
- Increased scheme compliance levels;
- Larger numbers of individuals who are saving for retirement; and
- Better returns for scheme members.

In most cases the supervisory agency meets the entire cost of providing the information services, and thus the recipients of the information do not incur any costs to obtain the information. The exception is where supervisors hold presentations and the recipients are required to meet their own transport costs in order to attend the presentations.

### 4.5 Technical Guidance Services

As with the provision of information, supervisors rely heavily on presentations and enquiry services to provide guidance to the parties that require this information. Guidance notes, also used by most agencies, are available for existing legislation, and any new information is circulated by use of the same, or through presentations by agencies (Chart 3).

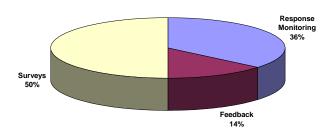


**Chart 3: Supervisors Providing Technical Information through Various Channels** 

18

By providing these services, supervisors, aim at enlightening and guiding practitioners, promoting compliance and protecting the interests of scheme members. In addition, the supervisors use trustee guidance services such as briefings and consultative meetings to exchange ideas with stakeholders in the industry. Effectiveness of the provision of these services is also largely measured by assessment of feedback and monitoring of the responses to education initiatives (Chart 4).

### **Chart 4: Channels of Assessment of Effectiveness of Guidance Services**



Supervisors feel that the provision of these services has resulted in:

- Increased stability of schemes as a result of higher levels of compliance;
- Better understanding of regulations by stakeholders;
- Increased confidence of scheme members; and
- Enhanced communication between supervisors and stakeholders

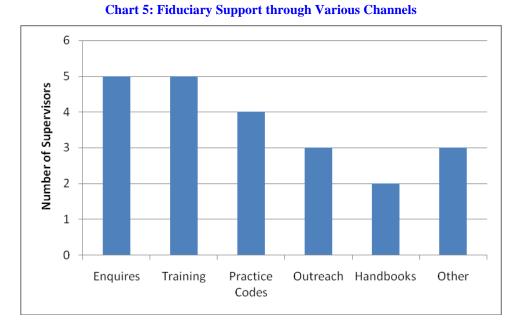
Costs Incurred for Provision of Technical Guidance Services?				
	Yes	Νο	No response	
Supervisor	7	1	4	
Target audience	2	6	4	

### **Table 8: Bearer of cost of Technical Guidance Services**

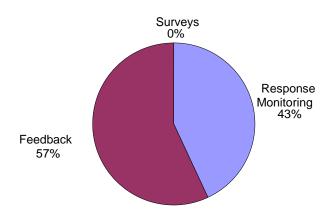
Unlike the case of information services, some recipients of the guidance services meet the cost of provision of the service (2 out of 8 supervisors). Where the supervisors meet the full cost of technical guidance services, supervisors noted that the resulting increased levels of compliance more than offset the initial guidance costs.

### 4.6 Trustee /Fiduciary Support Services

All the countries with trust-based systems provide support services for trustees. The main channels for providing this support are trustee training and inquiries support (Chart 5).



The supervisors generally assess the effectiveness of these services through feedback from discussion forums and response monitoring (Chart 6).



### **Chart 6: Channels of Assessment of Effectiveness of Trustee Support Services**

All supervisors providing these services incur costs, but in 3 out of 5 cases the target audience is also required to incur costs (Table 8).

### **Table 9: Bearer of cost of Trustee Support Services**

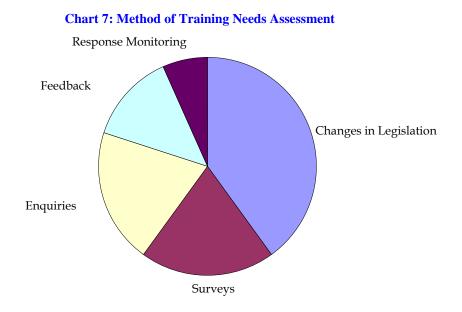
Costs Incurred for Trustee/Fiduciary Support Services?					
	Yes	Νο	No Response		
Supervisor	5	0	1		
Target audience	3	2	1		

Supervisors feel that the provision of trustee/fiduciary support services has resulted in:

- Common practice in the industry;
- Increased scheme compliance ;
- Better-run schemes due to increased professionalism in the running of schemes; and
- An easier job for regulators as guidelines and regulations are better understood by trustees and fiduciaries.

### 4.7 Training Needs Assessment

In developing their supervisory education programmes supervisors use different methods to establish training needs. In 40% of cases, a change in legislation would necessitate an education activity for the target audiences. In other cases, supervisors rely on surveys, feedback, inquiries and response monitoring to establish the need for education (Chart 7).



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### 5.0 Conclusions and Lessons Learnt

One of the most significant findings from the study is that almost all supervisors who responded do, or plan to, carry out some form of education, with 16 out of 19 supervisors already carrying out education and a seventeenth, Jordan, planning to do so in the future. Germany and Portugal require that professionals in the industry be fit and proper, and do not provide any supervisory education because providing pensions education by the supervisor would contradict these legal requirements. Both of these institutions, however, provide information that they deem necessary on their websites.

Whereas there is a general acceptance that training of stakeholders is necessary and that the impact of the same justifies the costs incurred, it is important to note that the existence of certain regulations can significantly reduce the costs of ensuring a wellinformed industry.

Netherlands and Ireland have noted that:

- Requirements that service providers be fit and proper; and
- Certification of certain stakeholder training courses from private institutions that service providers are required to attend,

have contributed to better informed stakeholders while easing the roles that the regulators are required to play.

Whereas legislative requirements may affect the provision of education to stakeholders, there is no significant evidence to show their absence impacts negatively on stakeholders. There is also no significant difference between the types of services offered by agencies providing education voluntarily and those that do so as a result of legislative requirements.

Whatever the arrangement for acquiring it, knowledge and understanding of the issues involved in running pensions arrangements is absolutely vital for those engaged in the process. In those few countries where there is no or very limited involvement in supervisory education activity, there is nonetheless a demonstrable requirement for those involved to be fit and proper. Providing pensions education by the supervisor would contradict the legal requirements because these requirements have to be fulfilled ex ante.

It is important to consult on avenues that can be used to make the provision of education as cost-effective as possible for both supervisory agencies and industries, and what institutions can be brought on board to ease the financial burden.

A good starting point would be the case studies attached as appendices to this report. For example, the use of an agency website for detailed instruction has been cited as a cost-effective means of educating stakeholders, as discussed in the Pension Regulator's (UK) case study, and noted in The Pensions Board's (Ireland) case study.

Finally, the role of education in the enhancement of the pensions industry cannot be downplayed. As a result, it is important for supervisory agencies to continually research on matters that would result in greater benefits to members, and on the best channels to use for the dissemination of the same to the stakeholders concerned.

In terms of further research, it is proposed that a second phase of this project be undertaken with an objective of deriving further detailed lessons from IOPS members' experience, and the lessons drawn from this paper. It is also important for supervisors to identify efficient tools for the assessment of stakeholders' training needs, and thus make it easier to develop educational material. Further research in this area would go a long way in developing and strengthening pensions industries in IOPS member countries.

### Lessons Learnt

The fact that the provision of supervisory education has been found to contribute significantly to the development of the pensions industry and to positively affect all recipients suggests that pension supervisory authorities should, where appropriate, be encouraged to ensure that this education is not only available to all stakeholders, but that it is affordable, up-to-date, and easily accessible. This report has drawn the following lessons for making the provision of supervisory education efficient. Pension supervisory authorities should therefore, where appropriate, be encouraged to:

- i. Ensure that they provide basic information through such channels as brochures and other promotional material;
- ii. Provide relevant information through their websites, which, throughout the course of this paper, have been identified as cost-effective in terms of time and numbers of individuals reached;
- iii. Approve training material offered by other institutions that would seek to complement the regulator's work;
- iv. Ensure that the training provided, especially by the supervisory institution, is affordable to the recipients, particularly because it increases the chances that the education opportunities will be taken up;
- v. Ensure that trustees who have been identified throughout this project as major stakeholders in the success of the pensions industry, are trained regularly so that they are better equipped to carry out their affairs in the management of schemes;
- vi. Regularly carry out research to gauge the needs of their target audiences so that they can tailor their educational material to cater for these needs; and,
- vii. Educate stakeholders on any regulatory changes affecting the industry, whenever these changes arise.

**APPENDICES / CASE STUDIES** 

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# Appendix 1. IRELAND CASE STUDY

### 1.1 Introduction

The Pensions system in Ireland comprises two main elements. The first is the Social Welfare System, run by the State, and the second comprises voluntary supplementary pensions provided through the private sector. The State encourages and promotes membership of occupational and personal pension schemes through favourable tax treatment and regulation to safeguard entitlements. Payment of tax is exempted from contributions to such schemes and on the returns on the investment of these contributions while pension entitlements are being built up. Tax is paid on the pensions as they become payable with the exception of a tax-free lump sum.

The operations of Occupational Pension Schemes and Personal Retirement Savings Accounts (PRSAs) are regulated by the Pensions Board in accordance with the legislation which amongst other things, sets down requirements for the financing and monitoring of schemes, vesting and preservation of benefits, payment of contributions and disclosure of information to members. The Pensions Board comprises representatives of the social partners, consumer and pensioner interests, the pensions industry and Government departments.

### 1.1.1. The Pensions Board

The Pensions Board was established by the Pensions Act, 1990. The main functions of the Board as set out in the Pensions Act, 1990 as amended ("the Act") are:

- To monitor and supervise the operation of the Act and pension developments generally, including the activities of PRSA (Personal Retirement Savings Account) providers, provision of PRSA products and the operation of PRSAs;
- To issue guidelines or guidance notes on the duties and responsibilities of trustees of occupational pension schemes and codes of practice on specific aspects of their responsibilities;
- To issue guidelines or guidance notes on the duties and responsibilities of PRSA providers in relation to PRSA products;
- To encourage the provision of appropriate training for trustees of occupational pension schemes, and to advise the Minister on standards for trustees; and,
- To advise the Minister on all matters in relation to the Act and on pension matters generally.

#### *1.1.2*. Supervising the Act

The most important task of the Pensions Board is to monitor and supervise the operation of the Act. The responsibility for actually ensuring that the provisions of the Act are fully complied with lies with trustees of pensions schemes, employers, PRSA providers, and others involved in scheme administration and the operation of PRSAs. Monitoring and supervising the operation of the Act involves a wide range of tasks including:

- Assisting members and PRSA contributors who are concerned about the operation of their pension scheme, PRSA, and if necessary, acting on their behalf;
- Carrying out investigations into the operation of schemes and PRSAs;
- In relation to Defined Benefit Schemes, processing Actuarial Funding Certificates (and, where appropriate, Funding Proposals) for the purposes of the Funding Standard: and.
- If necessary bringing Court actions against those who do not comply with the Act. ٠

#### The Pensions Board's role in the provision of pension education, outreach 1.2 and communication

#### **Trustee Support Services** 1.2.1

Trustees have overall responsibility under the Pensions Act for the administration of schemes. Accordingly the main statutory functions of the Pensions Board as set out in section 10 (1) of the Act include:

- Providing guidance for trustees on their duties and responsibilities in relation to • scheme administration;
- Issuing codes of practice on specific aspects of trustees duties; and,
- Advising the Minister on standards for trustees and their implementation.

### **Information Booklet for Trustees**

The Board has produced an information booklet "So You're A Pension Scheme Trustee?" which gives concise duties and guidance to trustees on their duties and responsibilities. The booklet is regularly updated to reflect legislative changes and is available free of charge from the Pensions Board and published online on www.pensionsboard.ie.

### **Trustee Handbook**

More comprehensive guidance is provided for trustees by means of the Pensions Board Trustee Handbook and Codes of Practice, which are also designed to make a major contribution to the discharge of the Board's functions under the Pensions Act. The Trustee Handbook is available by subscription from the Board. The Codes of Practice is available free of charge from the Pensions Board and are published online on www.pensionsboard.ie

Given the importance of the Handbook to assist the trustees as a tool in the effective discharge of their duties and responsibilities, Disclosure of Information Regulations contain a requirement that specific reference as to whether the trustees of the scheme have access to the Trustee Handbook, be made in the Annual Report of each scheme.

### **Enquiry Service for Trustees**

The Board provides a specific enquiry service for trustees in relation to their duties and responsibilities, with particular reference to the type of information and guidance which is provided in the Trustee Handbook. Inquiries of the more straightforward type are usually dealt with by telephone. Reponses to more complex and difficult queries are generally given in writing and if necessary, meeting with the enquirer at the Board's offices if the enquirer cannot be referred to an appropriate section of the Trustee Handbook.

### **Costs of Trustee Handbook and Codes of Practice**

The Trustee Handbook and Codes of Practice cost  $\notin 60,000$  to produce and publish. The Trustee Handbook is sold at a cost of  $\notin 90$  per copy and the Codes of Practice is made available free of charge. There is no charge for outreach services which involve Pensions Board personnel making presentations to trustees.

### Measuring the effectiveness of Trustee Handbook and Codes of Practice

The Board conducts regular Customer Service surveys as part of its continuous commitment to the better discharge of its functions. As part of these surveys, trustees are asked to indicate their level of satisfaction with the Trustee Handbook and Codes of Practice. 54% of those surveyed find these services excellent, 28% find them very good, 10% good, 6% fair and 2% poor.

### **Impact of Trustee Handbook and Codes of Practice**

The key objective of the Pensions Board in promoting the security of occupational pensions is to provide authoritative guidance to trustees on how to achieve voluntary compliance with the Pensions Act and other relevant legislation and good practice generally in relation to scheme administration. The Trustee Handbook and Codes of Practice make a major contribution to achieving this objective. The Handbook is intended to assist trustees by providing more detailed guidance on their duties under the Act and Trust Law. Under the Act, the Board has the duty to monitor and supervise its operation, and the power to bring proceedings for summary offences under the Act. Trustees should therefore be aware of their duties under the Act. They should also be aware of the standards which the Board would expect from them in its role of monitoring and supervising the operations of the Act and pensions developments. Accordingly, where in guidance given it is stated that a particular course of action must be taken, trustees in failing to take such action will be in breach of the Pensions Act, Trust Law and other relevant legislation.

### **1.2.2 Trustee Training**

The Pensions Board also has a statutory function under Section 10 (1) of the Pensions Act:

• To encourage the provision of appropriate training facilities for trustees of schemes.

A list of approved Trustee Training Courses has been compiled by the Board and is available for those seeking such training. The course providers are only included on this list when they have satisfied the Board on the content of their training course. The Board, from time to time, carries out detailed evaluations of the courses being provided. This involves Board staff attending the courses as observers. Continued inclusion on the Board's approved register depends on the outcome of these evaluations.

### Measuring the effectiveness of Trustee Training

While trustees are required to disclose whether they have access to trustee training in their schemes Annual Report, the body of research on this issue reveals that continuous, quality training is not the norm. In seeking to drive up levels of ability and understanding among trustees, it remains an option to introduce automatic training for trustees, rather than the current voluntary basis, in order to increase standards. The delivery of such training, and the supporting infrastructure, as well as the potential costs to the schemes present the most significant challenges to its introduction.

In the Pensions Board's experience, trustees' levels of ability and the types of skills they possess vary greatly. The findings of recent research carried out by the Board as part of its review of trusteeship, emphasised the importance of training for trustee development particularly as most trustees surveyed attended initial training upon becoming a trustee and considered it useful. Follow-up training was rare and, in cases where it did exist, was often sporadic and unstructured. The research suggested that ongoing quality training was the exception rather than the rule. Employer-nominated trustees were generally satisfied with the training they received upon taking up the trustee role, but the majority did not attend any further courses or training sessions. Member trustees attached great value to training but gaining access to courses was an issue for some.

These results coincide with results from earlier quantitative research carried out by the Pensions Board in 2001 and 2003 respectively. It found that 75% of trustees undertook a training course within 12 months of their appointment. 65% indicated that Member Trustees did not receive additional or specialised training, and 71% of respondents did not receive 'refresher' courses. The same research indicated that 66% of the trustees surveyed had undergone some form of trustee training since their appointment.

### **Impact of Trustee Training**

84% of trustees surveyed as part of the research mentioned above, believed that as a result of trustee training, they were adequately informed to carry out all of their duties and responsibilities effectively and in accordance with legal obligations.

As part of its policy advisory role, the Pensions Board carried out a review of trusteeship in 2006 to examine whether trusts continue to be the most suitable frame work for Occupational Pension Schemes. The Report on this Review, which has recently been published, concludes that the current trust model should be continued as it offers protections that justify its retention. The Report makes a number of recommendations that aim to enhance the governance of occupational pension schemes and member protection. Recommendations in relation to trustee training include those to the effect that employers should automatically arrange trustee training for all trustees within 6 months of their appointment, and at least every 2 years thereafter. Furthermore, the potential of new means of trustee training such as e-learning should be explored.

Planning for implementation of the recommendations in the Report is currently underway.

### **Costs of Trustee Training**

The cost of trustee training usually involves full expenses for the course and travel, and the cost of time off from employment, etc to attend the course. The costs involved may be met in full by the employer(s) sponsoring the scheme. If they are not met by the employer, the Pensions Act provides that, notwithstanding anything contained in the rules of the scheme, reasonable costs and expenses incurred in receiving trustee training may be met from the resources of the scheme.

### **1.2.3** Technical Guidance Services

As the Pension Act and its regulations override the Trust Deed and Rules of schemes, it is important that scheme trustees, administrators and their professional advisors ensure that the legislation they refer to is fully up-to-date. The Board promotes the security of Occupational Pension Schemes and PRSAs by providing clear, authoritative guidance to trustees and pension practitioners on how to comply with the Pensions Act and good practice generally in relation to scheme administration.

### Subscription Services (Legislation Service and Guidance Notes)

The Board makes a number of services available on a subscription basis, including the Legislation Service designed primarily for pension practitioners. Subscribers to this service receive a non-statutory consolidated text of the Pensions Act, and its Regulations. In 2006 the Board conducted a review of the production of the Legislation Service in order to identify the most efficient and expedient method of delivery of this service to its customers. The outcome of the review is that in future the Legislation Service should be provided by an external service provider in an online format with effect from early 2007.

The Board also makes available by subscription detailed Guidance Notes on the various parts of the Pensions Act and regulations, especially in those areas which override the trust deed and rules of the scheme. Subscribers to the service receive updates to take accounts of any legislative changes. In 2006, the Board also conducted a review of the method of delivery of this service, to include a consultation process with its customers. The outcome of this review will see the provision of a new range of Guidance Services to include Guidance Notes, Guidelines and Frequently Asked Questions (FAQs). These will be made available free of charge and online in a new Guidance section on the Board's website in 2007.

### **Costs of Legislation and Guidance Notes Services**

The Legislation Service has cost the Board approximately  $\notin 20,000$  per annum to produce in print format. The cost for this print version for subscribers has been  $\notin 900$ , which was a 'once-off fee', and an annual subscription cost of  $\notin 250$  thereafter for updates to the service. A similar costs scale will be applied by the external service provider for the new online version of the service.

The Guidance Notes cost in the region of  $\notin 10,000$  per annum to produce and have been available to subscribers at a cost of  $\notin 30/\notin 50$  per set, depending on the subject matter. The Guidance Notes will be available to the Board's customers free of charge in online format from mid-2007.

### Non-Subscription Guidance Services

The Board also issues guidelines and Frequently Asked Question (FAQs) on specific issues through its website and through representative organisations, e.g. on such matters as remittance of contribution provisions and applications in relation to the Funding Standard for Defined Benefit Schemes. All Guidelines, FAQs on technical issues and Guidance Notes will be presented in the new Guidance section on the Board's website, which is currently being developed.

The Board produces a regular Bulletin through which it communicates updates on pensions legislation to practitioners on matters such as the transposition of the EU pensions directive and on compliance issues.

### Measuring the effectiveness of Technical Guidance Services

The Board carries out regular Customer Surveys which ask customers for their views on its various guidance services and for suggestions on any improvements they feel would make the services more useful. Feedback on the Legislation Service indicates a level of satisfaction at 44% excellent, 36% very good and 20% good. On the Guidance Notes feedback indicates a level of satisfaction at 41% excellent, 32% very good, 14% good and 13% fair.

The Board also operates a comments/complaints procedure under its Customer Action Plan (CAP) and Customer Charter which enables customers to offer comments/complaints about the Pensions Board's services.

### **Impact of Technical Guidance Services**

The provision of technical guidance services for pension practitioners, whilst a statutory function of the Board, also helps to forge a more direct relationship with the practitioners in working together with the common purpose of promoting the security of Occupational Pensions and PRSAs, achieving voluntary compliance with the regulatory regime and the provision of efficient and cost effective scheme administration.

### 1.2.4 Information Services

The effectiveness of the Pensions Act in safeguarding the rights of scheme members significantly depends on members using the rights they have under the Act to monitor the administration and financial soundness of their scheme and to obtain information on their own personal entitlements.

To this end, the Board produces information booklets which are relevant for members, their dependants, prospective members, trustees, employers and the general public.

### **Information Booklets**

There is a comprehensive range of 16 information booklets, free of charge, from the Board. These provide information on the Pensions Act, the Pensions Board and members' rights under the Act and other relevant pensions legislation.

### **Enquiry Service**

The Board's information enquiry service deals by telephone and correspondence, with inquiries or complaints received from scheme members and their dependants, prospective members, trustees, trade unions, employers and company employees with human resource, pay and industrial relations functions. The Board services in excess of 11,500 inquiries per annum.

### **Information Presentations**

The Board uses various methods of communicating the 'pensions message', including activities undertaken under the National Pensions Awareness Campaign (NPAC). On average 40 information presentations are given per annum to trustees, trade unions, employer personnel, professional bodies and others on the main features of the Pensions Act and other legislation affecting pensions.

### Pensions Board Website (www.pensionsboard.ie)

The Board's website contains a wide range of information including the Board's information booklets, information presentations given by Board personnel, interactive pensions calculators, Frequently Asked Questions (FAQs) on topical issues, Codes of Practice for trustees, and technical guidelines for trustees and pension practitioners. The number of visitors to the website in 2005 was 216,052.

### **Costs of Information Services**

Costs are variable in relation to the different information services and depend on the level of activity in a given year. Costs of publications like information booklets are in the region of  $\notin$ 20,000 per annum. Newsletters/Bulletins are published online and written internally so there are no publication costs. The website costs in the region of  $\notin$ 10,000 per annum to maintain. There are no costs to the Pensions Board's customers for any of its information and enquiry services.

### **Measuring the effectiveness of Information Services**

The Board has a Customer Action Plan (CAP) which sets out how the Board delivers each of 12 Quality Customer Service Principles (QCS), which Government has endorsed for the Irish Public Service as part of its Strategic Management Initiative (SMI). The Board reviews its CAP regularly to ensure that its performance meets its commitments as set out in the CAP and must report on the outcome in its Annual Report.

The Pensions Board consulted its external customers and analysed feedback, which led to the production of its Customer Charter, which reflects its customers' requirements. The Customer Charter is published on the Board's website and displayed in its offices. The Board's CAP is also available in booklet format online.

Comment cards are provided in the Board's Reception area and online, and customers can comment upon/complain about aspects of its services. These comment cards are reviewed quarterly and customers' suggestions are acted upon as far as possible.

### **Impact of Information Services**

Information and enquiry services provided by the Board have generated awareness among the general public that Ireland has a robust system of pension regulation that protects the interests of scheme members, PRSA contributors and the broader public. Further, there is the encouragement of greater pensions take-up, particularly among young people, women and atypical employees who have the lowest levels of pensions coverage.

A survey conducted by an independent market research organisation at the end of 2005 for the Board confirmed that pensions awareness is now at a high level, with 87% of the respondents believing that the State social welfare pension would not meet their needs in retirement.

### **1.3 Conclusions**

The Pensions Board broadly sees its role in the area of supervisory education as having two main functions, each of which is complementary to the Board's primary role as a regulatory and policy advisory body:

- An "educational and technical support" function: to inform, guide and increase awareness among pension scheme trustees and pension practitioners regarding their responsibilities under the Pensions Act and other legislation affecting pensions, whether pending or in force; and,
- ii) A "promotional" function: to increase awareness among scheme members and PRSA contributors in relation to their rights, and among the public in relation to the importance of pensions; to encourage greater take-up of pensions particularly among socio-economic groups, including women, young persons/new entrants to the workforce and persons in atypical employment, that have the lowest levels of pensions coverage.

These two functions are reflected in the Board's Mission Statement which defines its activities as follows:

• To promote the security of and protection of members of occupational pension schemes and contributors to Personal Retirement Savings Accounts (PRSAs), in accordance with the Pensions Act, 1990 as amended;

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- To promote the development of efficient national pension structures;
- To promote a level of participation in the national pension system which enables all citizens to acquire an adequate retirement income; and,
- To provide information and authoritative guidance to relevant parties in support of pension security, structures and participation.

The actual impact of each of the Board's various information and guidance services has already been discussed earlier in this case study.

The Pensions Board accepts its involvement in information and guidance provision, pensions awareness and development of pension coverage and its ongoing strategy incorporates these elements. The Board also manages the Government sponsored National Pensions Awareness Campaign and the Board's own information /awareness work is complementary to the role and input which it has in the National Campaign.

# Appendix 2. KENYA CASE STUDY

### 2.1 Introduction

The Retirement Benefits Authority (RBA) was established to:

- Regulate and supervise the establishment and management of retirement benefits schemes;
- Protect the interests of members and sponsors of retirement benefits schemes;
- Promote the development of the retirement benefits industry;
- Advise the Minister for Finance on the national policy to be followed with regard to the retirement benefits industry; and,
- Implement all government policies relating thereto.

At the time of its inception, the retirement benefits industry was dogged with vices ranging from misappropriation of scheme funds to lack of payment of retirement benefits due to individuals. As a result, it was important for the Authority to:

- Introduce guidelines that secured the interests of scheme members and retirees; and,
- Educate stakeholders on the roles they were required to play in order to strengthen the industry.

Over the years since its inception, the Authority has not only sought to disseminate relevant information to all stakeholders and other interested parties, but it also carries out research on a regular basis in order to identify the needs of target audiences and address them in good time.

This case study will cover the different methods used to measure and address stakeholders' educational needs, and discuss the impact that the provision of such education has had on the industry as a whole.

### 2.2 **Provision of Education**

The Retirement Benefits Authority carries out stakeholder education voluntarily, and its target audiences are:

- Trustees;
- Scheme members/beneficiaries;
- Sponsoring employers;

- Fiduciaries;
- Pension practitioners/Professional advisors; and,
- Plan administrators/managers.

Most education is carried out through training seminars held in various parts of the country, and Open Days that the Authority hosts once a year. RBA also participates in exhibitions and trade fairs in order to make information easily accessible to members of the public.

As the Authority seeks to achieve its objectives and serve the industry better, it has identified its key concerns as:

- Under-funded schemes, especially in the public sector;
- Poor investments of scheme funds, leading to poor returns for members;
- Misappropriation of scheme funds due to members' lack of adequate awareness;
- Poor administration and record keeping, leading to long delays in payment of benefits to members; and,
- Excessive interference by sponsors in scheme affairs.

Because these issues mainly concern the management of schemes, education is largely targeted towards scheme trustees, and the educational programmes with the greatest frequency are trustee training seminars.

## 2.2.1 Trustee Education

Whereas the main mode of educating this group is through trustee training seminars, RBA also handles and responds to queries on a daily basis, and attends scheme Annual General Meetings in order to address questions from scheme trustees as well as scheme members. In addition, the Authority publishes a quarterly newsletter with information on fund managers' performance and articles on topical issues. Past editions of the newsletter, RBA News, are available on www.rba.go.ke.

Seminar presentations cover:

- The role and objectives of the RBA;
- Roles and responsibilities of trustees;
- Financial provisions in the RBA Act;
- Scheme compliance requirements;
- Taxation; and,
- Investment of scheme assets.

Every year, following the tabling of the country's budget, seminar participants are also informed on budget changes affecting the industry and their impact on scheme sponsors, trustees and members.

Trustees' responses to the educational material provided are measured through evaluation questionnaires. The questionnaires are set to gauge the usefulness of topics covered, and quality of presentations. Further, suggestions for improvement are invited. Reports are compiled following every seminar and the recommendations used to improve future presentations.

Over the years, trustees continue to value the topicality and quality of presentations, as shown by their ratings of the same. Presentations on average, range between good and excellent for all topics covered. In addition, suggestions for improvement differ with every seminar, as recommendations for improvement continue to be addressed.

# 2.2.2 Member and Beneficiary Education

Education of members and beneficiaries is often carried out through handling of inquiries and complaints. However, information is also given through brochures that contain information that ranges from the importance of saving for retirement, to Frequently Asked Questions (FAQs). RBA's website also provides information on any research work that has been carried out and any recommendations that have been made with regard to the research.

Measurement of this group's needs is often done through analysis of queries received, and any anticipated queries that may arise as a result of new legislation.

Education is also carried out through Pre-retirement Training Seminars held on a regular basis. Evaluation of educational needs in this regard is carried out using the evaluation questionnaires administered, and suggestions for improvement are addressed in future presentations.

Members and beneficiaries are also educated through RBA stands that can often be found in exhibitions such as regional trade fairs, and enterprise exhibitions. When the Authority participates in such exhibitions, if there is adequate space, service providers are invited to give interested parties information on how they can enhance their savings for retirement.

## 2.2.3 Education of Sponsoring Employers

This group is often educated through presentations made on request. Employers who are interested in starting up schemes are enlightened on the requirements that must be met before starting a scheme, and the benefits of establishing retirement benefits schemes for their employees. They are also educated through queries handled, RBA News and information that can be found on the Authority's website.

# 2.2.4 Education of Other Groups

Fiduciaries, Pension practitioners/Professional advisors and Plan administrators/managers are often educated through queries handled on a daily basis. The second most common way of disseminating information to these groups is through consultative fora, especially with the introduction of any new legislation. These groups, because they constitute scheme service providers, are also kept informed on developments in the industry through briefings that are necessitated by any new changes in the retirement benefits industry, or any new products/services launched by the RBA.

#### **2.3 Impact of Education**

The provision of education has continued to be a key driver of the development that is evident in the retirement benefits industry. This development can be seen in information that the Authority disseminates on a quarterly basis through RBA News. The number of managed schemes continues to grow, as does the value of assets under management. For the different target audiences, it is possible to analyse the impact of the provision of supervisory education, through various indicators.

#### 2.3.1 Impact of Trustee Education

Scheme compliance continues to increase as trustees become better informed about the requirements that they are expected to meet. This compliance is evident in the increased submission of reports within the required time. Another indicator is the fact that 854 of the 1340 schemes that are currently running have met all the statutory requirements for registration, and are therefore registered. Schemes have not only grown in number, but also in value of assets.

Secondly, RBA carries out risk-based scheme inspections when necessary. At the moment, it has only been necessary for RBA to inspect 26 out of 1340 schemes that are currently running, based on risk factors such as liquidity problems or their inability to get registered within a reasonable period of time.

Recent budget changes saw a minimum agenda set for scheme Annual General Meetings. These changes not only sought to make trustees more accountable to scheme members, but also to enable them to give necessary information to the latter. Results from the Members' Survey carried out by RBA in 2006 indicate that more than 50% of scheme members are aware of their scheme category, type and design. More than half of the members interviewed are also aware of the monthly employee and employer contributions.

Education of trustees has also translated into greater transparency as shown by the increase in the number of members who have received benefits statements:

Year	Benefits Statements Received (%)
2001	31.70
2002	34.57
2003	38.35
2004	45.01

(RBA Members' Survey, 2006)

# 2.3.2 Impact of Member and Beneficiary Education

In addition to knowing about scheme structure, members are aware of their rights, as is shown by complaints received regarding issues such as attachment of benefits and employers' failure to remit contributions. Since RBA's inception, 71 beneficiaries have lodged complaints regarding attachment of their benefits, 10 have complained about their employers' failure to remit contributions, and a few others on issues such as poor scheme administration.

Results from the Members' Survey also show that the majority of members are aware of their various rights:

Member's Right	Aware (%)
Right to nominate beneficiaries	80.49
Right to membership statements	79.86
Right to membership as an employee	78.34
Right to participate in AGMs	69.15
Right to nominate trustees	69.09
Right to complain about benefits or report trustees to RBA	64.81
Vesting of employer contribution	64.18
Right to access scheme information through RBA	61.31
Right not to have benefits attached	59.95
Right to inquire about scheme books of accounts	59.05
Right to inspect scheme books of accounts	56.85

78.23% of the members sampled had heard of the RBA prior to the survey exercise.

Finally, there has been greater response to individual retirement benefits schemes. More than 30% of those who visited service providers hosted by the RBA at the Nairobi International Trade Fair held in October 2006 noted that they were interested in becoming members of an individual retirement benefits scheme.

#### 2.3.3 Impact of Education of Other Groups

Regular education of and consultation with service providers has led to increased collaboration between the supervisor and these groups. Most service providers submit all necessary reports within the specified deadlines, and are quick to address any issues that may arise.

Also worth noting is the willingness of service providers and statutory boards such as the Kenya Revenue Authority and the National Hospital Insurance Fund, to collaborate with the RBA in the education of target audiences. The statutory boards regularly provide facilitators for RBA trustee training seminars.

# 2.4 Conclusion

Whereas supervisory education continues to provoke positive responses in the industry, there continue to be a large number of individuals in most target groups who need to be educated.

The Retirement Benefits Authority has greatly relied on trustee education as a tool for developing the industry, although there remains a great need for education of scheme members and individuals in the informal sector. Whereas it is not possible to determine whether education of other groups to such a large extent would yield better results, the education of trustees on their responsibilities as the managers of scheme business has injected professionalism in the retirement benefits industry, and largely contributed to increased levels of scheme compliance.

The challenge now lies in identifying the most efficient means of relaying the necessary information to various target audiences. This will definitely increase the level of coverage and enable members to take greater charge of their responsibilities as scheme members.

The Authority continues to seek new avenues through which it can reach these individuals, and is especially making great efforts to participate in exhibitions that are likely to reach more members of the informal sector.

# Appendix 3. SOUTH AFRICA CASE STUDY

# 3.1 Introduction

The Financial Services Board (FSB) is a regulatory institution that was established through the Financial Services Board Act 97 of 1990, which was later amended in 2002. The Board regulates non-banking financial services such as insurance (long- and short-term), collective investment schemes, financial advisors and intermediaries, capital markets and retirement funds.

In addition, the Board promotes the education of consumers.

The Financial Services Board does not provide formal education to pensions industry stakeholders, but basic information on specific topics relating to pensions issues is contained in booklets which are distributed to consumers. In addition, the board does not provide training on pensions matters, but industry representatives provide training, workshops and seminars on topical issues including:

- Governance of funds;
- Disclosure; and,
- Member protection.

#### 3.2 Legislation

Under The Financial Services Board Act, the Board is required to promote programmes and initiatives by financial services institutions and bodies representing the financial services industry to inform and educate users and potential users of financial services and products.

# 3.3 Consumer Education

In line with its mandate to educate users and potential users of financial services and products, the FSB has established a Consumer Education Review Committee. The committee was established to provide input into a strategy development and implementation plan. This committee comprises of representatives from:

- Financial services institutions;
- Financial industry associations;
- Regulatory bodies;
- Department of Trade and Industry;

- Churches;
- NGOs;
- Trade unions;
- Consumer bodies;
- Government Communication and Information Centre; and,
- Other bodies promoting consumer education, e.g. Savings Institute

The Consumer Education Review Committee's current roles are to:

- Provide expert input into the implementation of the Consumer Education Strategy; and,
- Monitor the implementation of the strategy;

The Strategy has three components:

- Education on effective saving and debt management;
- Knowledge of products and services available and which might be most applicable to their circumstances; and,
- Cautious approach to purchasing financial products and knowledge of their rights, responsibilities and recourse options

The sub-strategies of the consumer education strategy include encouraging open conversation about finances, the use of a budget as an aid to saving and the development and field testing of consumer education booklets, rights and responsibilities of consumers, recourse, the effects of inflation and compound interest, and responsible financial behaviour for specific life events.

The target market for the FSB's consumer education programme is consumers in all socio-economic levels within South Africa.

At the moment, it has been difficult for the FSB to roll out its consumer education because there is currently no regular source of funding for the programme.

# **Provision of Consumer Education**

Although the Financial Services Board does not provide pensions education or training, it is represented on the Insurance Sector Education and Training Authority (INSETA) workgroup, which is tasked to develop standards for training of members and trustees. The Investment Managers Association of South Africa (IMASA) has also developed unit standards for trustee training. These bodies then assess the institution and content of the training provided and grade the training and qualification accordingly.

Many universities, administrators and other training institutions are also involved in offering courses related to retirement funds.

Because 50% of the Boards of Trustees are elected by members, and trustees rotate on a regular basis, some trustees do not have the relevant expertise regarding the management of retirement funds. Continuous training is therefore required on management of a fund, as well as the duties and responsibilities of trustees.

## **3.4** Types of Education

#### 3.4.1 Formal Education

The priority of the FSB in the formal education system is to promote the integration of consumer financial management into the curricula of all levels and phases of education. The areas of focus currently are:

- Providing input into curricula to include financial management information and exercises in theoretical as well as practical education;
- Encouraging the inclusion of consumer financial education into teacher training curricula;
- Participating in teacher development in training programmes;
- Acting as a resource in the provision of content for teacher resource material; and
- Working with students and teachers with disabilities.

The target market for this programme is all economically active South Africans, especially those earning less than R 5,000 per month and the key messages for education are savings and debt management.

### 3.4.2 Community Education

The activities involved in this type of education are development of educational materials, translation of brochures, road shows, outside broadcasts, website, updating of strategic partners, commemoration of international consumer events, multilingual radio and television interviews, education at social grant pay points and participation in workshops nationwide (women's month and community policing forum with Gauteng; World Consumer Rights Day).

# 3.4.3 Intended Outcomes

The FSB anticipates that the provision of consumer education will result in:

- A better savings culture;
- A sustainable financial services sector;
- An improved understanding of consumer rights and responsibilities;
- Better product knowledge which will lead to informed investment decisions; and,
- Service providers committed to consumer protection.

# 3.4.4 Strategic Partners

The Board has identified some of its strategic partners as:

- Provincial Consumer Affairs offices (9)
- Department of Trade and Industry

- National Credit Regulator
- Council for Medical Schemes
- Consumer Protection Workgroup
- Consumer Advocacy Groups, e.g. National Consumer Forum, South African National Consumer Union
- Financial Sector institutions and bodies
- National Community-Based Paralegal Association
- Black Sash
- South African Savings Institute
- COSATU, NACTU, NUM (Trade Unions)
- Organisations of People with Disabilities
- Congress of Traditional Leaders (CONTRALESA)
- South African Council of Churches (SACC)

# 3.4.5 Assessment of Consumer Education

The assessment of the provision of consumer education is an important tool for:

- Measuring whether the education was effective;
- Providing information on what needs to be revised;
- Impact assessment (measurement of behaviour change over time);
- Assessing whether the objectives of providing the education have been met; and,
- Developing indicators of knowledge, attitude, skills and behaviour.

#### 3.5 Conclusion

The FSB is about to coordinate research on how best to assess the effectiveness of consumer education programme, especially awareness programme such as those conducted via radio, television, billboards, websites, among others.

# Appendix 4. UNITED KINGDOM CASE STUDY

# 4.1 Introduction of e-learning for pension scheme trustees by the UK Pensions Regulator - Executive summary

In the UK, the Pensions Act 2004 requires trustees to have knowledge and understanding appropriate for their roles and to be familiar with their own schemes. The Pensions Regulator has to ensure that this requirement is being met effectively and efficiently.

Evidence is that access to training by trustees is patchy. Nonetheless, there is clear evidence that training makes a marked difference to the governance of schemes (The Pension Regulator's Governance Survey 2006). Classroom learning is not a feasible solution because of lack of infrastructure and costs. Analysis of the cost and logistics of distance learning options points to the viability of an e-learning solution. The Regulator has therefore developed an e-learning solution; trusteetoolkit.com. The infrastructure and the first 25% of the content were delivered as a pilot programme in January 2006. The remaining modules were rolled out over the following 16 months, with the toolkit being completed in May 2007.

The total cost of development plus the first two years of support is £480,000 (€700,000). The cost of the first tranche (the pilot) was £142,000 (€200,000).

Early evaluation of the programme and feedback from the industry is extremely positive.

This forms one element of the Regulator's trustee knowledge and understanding regime, other elements of which include:

- A code of practice;
- Scope guidance;
- Syllabus; and,
- Support for learning and qualifications for trustees.

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Copies of the code, scope and syllabus and further information about the regulator's work is available on the Pensions Regulator's website at www.thepensionsregulator.gov.uk or on www.trusteetoolkit.com

#### 4.2 Background

Trustees play a critical role in the governance of their schemes and whilst it is clear from a number of sources that some trustees discharge their duties admirably, there is also a considerable amount of misunderstanding and confusion in relation to some areas of knowledge, particularly for trustees of small schemes. There is evidence for example that some trustees lacked basic understanding as to what type of scheme they were trustee of, or indeed that they were in the role of trustee (Opra Very Small Schemes Survey 2004). Further research into this issue, carried out by independent market researchers, revealed that trustees appreciate that they are very deficient in particular knowledge areas and they expressed a strong willingness to undertake learning to fill the gaps in their expertise (Incepta Market Intelligence: E-learning for Trustees 2005).

A key recommendation of the Myners Report on institutional investment was that trustees should be 'familiar with issues' when making investment decisions. The report also contained a number of investment principles, which became the voluntary 'Myners code' (Institutional Investment in the UK; a review, Paul Myners 2001). The subsequent Government review of the effectiveness of this code has also revealed that although much progress was being made, further action was needed to accelerate progress in key areas, in particular in relation to trustee expertise and decision-making processes. The Government has concluded that the Myners principle on effective decision-making should be strengthened so that it is fully aligned with the standard of knowledge and understanding set out in the Pensions Act (Myners principles for institutional investment decision-making: review of progress, HM Treasury, 2004).

Sir Derek Morris, as part of his independent review of the actuarial profession, indicates that trustees need a better understanding of actuarial matters in order to challenge their advisers (Morris Review, Interim Assessment, 2004).

The legislative provisions now make explicit the requirement to know and understand specified topics and require also that trustees be conversant with their own scheme documents.

The most recent research indicates strongly the very clear link between well trained trustees and well governed schemes. (The Pensions Regulator Governance Survey, 2006)

#### Trustees

The trustee body is characterised by its diversity. Trustees are appointed from a range of backgrounds, some of whom may have already experienced elements of the TKU requirements but many of whom may not.

This applies as much to company-nominated trustees as to member-nominated trustees. Trustee induction training may be the first inkling that trustees have of the dimensions of the role and even induction training is not likely to be available to trustees of small and medium DC schemes. The Pensions Regulator is also aware from its own research that often established trustees may have no further access (beyond induction) to training, in spite of the specific demands of the role. This is true of large schemes but is especially the case with small schemes (Opra OPS Regulatory Survey 2003, Pensions Regulator Governance Survey 2006).

The Government is very mindful of the fact that many trustees undertake the role on a voluntary unpaid basis, and of the need to encourage and not to deter this valuable work. During the consultation before the legislation, strong views were expressed that a mandatory qualification for trustees could have such a deterrent effect and could exclude all but professional trustees. For this reason, there is no mandatory qualification.

Nonetheless, trustees themselves during pre-consultation workshops confirmed the view that their ability to perform the role was enhanced when they had better knowledge and understanding of the issues involved in running a scheme. In the Pensions Regulator's market research on the matter this finding was overwhelmingly confirmed (Incepta Market Intelligence: E-learning for trustees 2005).

The Pensions Regulator's view is that proper decision making by trustees is dependent upon trustees having the necessary knowledge and understanding of their own role and scheme. Where trustees have had the requisite knowledge and understanding they have been able to respond well in adverse situations and schemes have been managed more appropriately. In the long term, the Pensions Regulator views the knowledgeable trustee as being a key safeguard in any risk-based regime, given their proximity to schemes and their role in the governance of them.

In summary, there is a target population of 126,000 trustees for knowledge and understanding who:

- Are virtually untrained, except for induction training of variable quality in the biggest schemes [1000+ members] (OPS and Myners research);
- Have a low and realistic opinion of their own expertise (Incepta and NOP);
- Display an unusually strong appetite for learning (NOP and Incepta);
- Look to the regulator as the preferred provider of learning (NOP and Incepta);
- Would welcome the opportunity to establish a relationship with the regulator through training opportunities offered by the regulator (NOP);
- Display an unusually wide range of experience and needs (NOP and Incepta); and,
- Vary as between Member nominated (MNTs) and Employer nominated (ENTs), where ENTs frequently over-invest in equities without appreciating the risks to the scheme and are not aware of the further risks to the scheme of corporate failure on the part of the sponsor (LBS and S&P).

# **Schemes**

Schemes also differ widely in their characteristics and, for example, they may not fit neatly into either defined benefit (DB) or defined contribution (DC) categories. It is consequently vital that training of any sort takes account of the need for trustees to relate the issues to their own scheme.

#### Acquiring knowledge and understanding

The Pensions Regulator is aware of the current learning and examination provisions that are available to trustees so that policy decisions are informed by what is both practicable and available to trustees by way of learning. Ideally, all trustees should have sufficient learning opportunities to be able to fulfill the legislative requirements asked of them. However, the geographic spread of trustee boards, the lay nature of most trustee roles, the size of schemes, and the ability to bear learning costs varies widely.

#### The regulator's risk-based approach

The Pensions Regulator recognises that the role of trustees is a key component of a risk-based regime. The Pensions Regulator are of the view that better decision making will follow when trustees have better knowledge and understanding of their role, their scheme and the principles of investment and funding.

#### 4.3 **Purpose of the e-learning programme**

The establishment of TKU regulatory requirements means TPR has to ensure that the requirement for trustee expertise is being met effectively and efficiently.

If TPR is to have credibility in encouraging TKU and enforcing the TKU provisions, it has to address the issues around the current lack of training provision and the lack of infrastructure to increase it.

Any solution to this problem involves costs and this paper sets out these implications for TPR. Despite the lack of trustee expertise there is a clear deficit in training interventions (OPS, NOP, Incepta, Standard and Poors). This has been the major burden of Her Majesty's Treasury interest over the last few years (Myners and Morris).

The problem is exacerbated by the varied profile of occupational schemes. Only the largest are able to afford trustee training, albeit only at induction level, leaving the trustees of the majority of smaller schemes (60%+) untrained. Yet it is the smaller schemes which are inherently less stable and at greatest risk of winding-up. (OPS and Myners research carried out by DWP).

In summary the e-learning programme offers an opportunity for the regulator to fulfill its aims of being informative and supportive with a high profile programme that has the support of senior figures in the industry.

# 4.4 Implementation

# 4.4.1 Content

The regulator had already mapped out the scope of knowledge and understanding required by trustees to meet the requirements of the Act. This was a large exercise involving collaboration and consultation with the industry over 2004 in support of both the development of a Code of Practice and of a syllabus. Responses to the Morris Review testify to a 'strong support for and endorsement of the work underway for the Pensions Regulator to develop a Code of Practice governing trustee knowledge and understanding...'

'This was widely seen as the most important piece of work in the pensions area and the appropriate focus for user understanding.' (Morris 2.38)

# 4.4.2 Options for delivering the learning which trustees might require

It is not feasible to provide classroom learning for 126,000 trustees in a suitable timeframe, regardless of whether the industry or the regulator provides it. There is not the infrastructure to be able to deliver it, even if all trustees could afford to pay for it. The

Pensions Regulator estimates that it would require five days at £250 (€368) per trustee per day.

Of the distance learning media available, the text-based model has notoriously poor penetration and learning and retention rates, while dating rapidly. The production and distribution costs make the proposition inordinately expensive and not a suitable option for 'small' trustees in particular.

Computer based training relying on disks or CD-ROMS also carry heavy distribution costs and they date too. Having tried these electronic media, the FSA is now migrating to e-learning for reasons of effectiveness, particularly since they now have 25,000 businesses to regulate. Production and distribution costs are prohibitive in either case.

E-learning therefore emerges as the only feasible option, by a process of elimination and that is why the Pensions Regulator has concentrated on it over the last few months. The Pensions Regulator examines this option below to demonstrate what an opportunity it presents to the regulator and to the industry to deliver to trustees the learning that they need.

# 4.4.3 E-learning

E-learning is a subset of e-publication, where e-publication is the online communication of largely text based material using PDF or HTML files. E-learning, on the other hand, makes use of screens and more sophisticated teaching techniques to encourage engagement and participation. These include audio, video, flash media technology and drag-and-drop.

This engagement has been found to be an effective learning tool and to contribute much to the reduction in learning time experienced by participants in e-learning. Information tends to be given in 'bite sized chunks' and there is plenty of opportunity for self checking and for repeating the loop where required. Hours required for traditional training can be cut by up to 60%.

Early diagnostic screens allow for segmentation to the extent that each participant may pursue a unique pathway through the learning material. Account is taken both of the scheme type and size and of the expertise of the participant.

Research from the Regulator and other bodies into the appetite for e-learning and its effectiveness indicates strong support among trustees for e-learning and equally strong support that it should be provided by the regulator.

All auditing firms confirm the value of e-learning for internal use and some have been so successful in using it internally that they are now marketing e-learning services to other businesses externally.

There are significant problems of viability which would face a commercial provider of e-learning. The most significant risks are:

- The cost of obtaining subject matter expertise;
- The small overall market size and lack of a discrete marketing channel; and,
- Competing products available for those who can afford to pay, leaving those who cannot afford to pay as the market.

#### 4.4.4 E-learning delivered by the regulator

Because of these difficulties in relying on a commercial approach the only way to deliver such a programme on time and to standard is for the regulator to commission it. This is also overwhelmingly the cheapest option for the industry as a whole. There are, moreover, significant additional benefits to TPR in relation to trustees from developing and delivering its own programme.

There are further benefits to TPR in relation to segmentation:

- Individually tailored learning based on personal diagnosis would be supplied to trustees, segmenting individuals by scheme type, experience and expertise;
- The facility would be a public good and would be open to any other group who would benefit by it (professionals, employers, members, etc); and,
- Optional links to text material, TPR publications and to other websites for the more advanced participants (e.g. relevant government and learning sites) would increase its value for the more advanced groups in the industry.

Moreover, there is value in a regime which will be fully available to small schemes at no cost at the point of use and at the convenience of individual trustees. Plans are already being laid to publicise any learning initiative through the providers, pension advisers, third party administrators and by using Google.

#### 4.4.5 Marketing the programme

Activities have included:

- Targeted emails to trustees;
- Links from TPR main site to the trustee toolkit and links from relevant external websites to trustee toolkit;
- Including references to TKU in speeches at conferences, seminars and workshops and providing promotional flyers and speaking specifically at events;
- Participating in targeted trustee events;
- Promotional events, e.g. breakfast launch for second module;
- Targeted mailshots to professional and trade bodies;
- Interviews and placed articles in a whole range of pensions and national press; and,
- Extensive networking activity with the industry to promote the toolkit and TKU generally, includes meetings over past two years with all major stakeholders

#### 4.4.6 The potential risk of this initiative to other training providers

The Pensions Regulator has and continues to have, frequent communication with training providers who are far too few in number to feel threatened. On the contrary, the legal requirements greatly enhance their market position and they are seeking advice about how best to meet the need which has emerged and for which the regulator's work has been a catalyst. Many trainers see a value in blending the e-learning with their own face to face offerings to enhance the learning experience for trustees.

# 4.4.7 The risk that the regulator might make undue use of information about the progress of trustees in their learning

The Pensions Regulator has had the regime constructed in such a way that it cannot trace the progress of individuals and the programme will deliver a Certificate of Successful Completion automatically.

# 4.5 Evaluation

## 4.5.1 Evidence of enthusiasm for the programme in advance of its launch

- The Incepta online survey research of January 2005 established the 'overwhelming' case for e-learning which should be provided by the regulator, free of charge;
- Evidence from the focus groups was that trustees were enthusiastic and that 10 out of 13 would recommend it to their fellow trustees and 12 out of 13 would recommend it to new trustees. They also had technical amendments to recommend which have been adopted; and,
- A survey of 800 trustees and professionals in the industry to test the acceptability of the Alpha version, under the auspices of Incepta, a market research company, showed very strong support.

#### 4.5.2 The credibility and quality of the material

The Pensions Regulator's own online survey and the Epic work in focus groups have confirmed that the product is of high quality and user friendly. The material is also available to visually and hearing impaired and Epic ran a focus group for them.

You can look at the programme yourself at <u>www.trusteetoolkit.com</u>.

# 4.5.3 Outside agencies with an interest

- The TPR advisory panel has shown consistent interest and support and, more recently enthusiasm, as the launch is approaching. Many of them were involved in the industry workshops which devised the Scope;
- The Pensions Management Institute (PMI) has adopted the Scope Guidance and syllabus and is basing its new qualification 'The Award in Trusteeship' on those documents which also form the basis of the e-learning programme;
- The syllabus was unhesitatingly accepted at once by the Qualification and Curriculum Authority and the Financial Sector Skills Council because, they said, of the unprecedented level of industry participation and commitment in drawing it up;

- There is growing evidence of discussion from the conference platform that other speakers than those from the Pensions Regulator (especially pension lawyers) are intending to rely on the regulator's programme for their clients; and,
- There have been two industry produced pieces of research, one from Wragges (pension lawyers) and one from Engaged Investor. Both are very encouraging about the importance of the initiative and the acceptability of it with the audience.

#### 4.6 Gathering evidence for evaluation in the future including target setting

The Pensions Regulator is confident that it can set robust targets for measuring the success of the programme over the medium term. There are currently 12,000 users, and more sign on every week. User numbers for the first year will give a base line for future years.

The Pensions Regulator is conscious that this forms one element of the Regulator's regime to improve trustee knowledge and understanding. This is an important element because it directly provides access to the learning that trustees need. Other elements include a code of practice, guidance on the scope of learning and a syllabus as well as support for the availability of a voluntary qualification. However, taken together, the regime is about fostering a culture change among trustees so that there is a widely accepted belief in the value of learning. In this sense the Pensions Regulator shall look to assess the impact of its efforts through such measures as an agreed improvement in the 'confidence in own expertise' section of the Perceptions survey, which is addressed to lay trustees (benchmark already set); and, an agreed improvement in the relevant parts of the governance survey with year 1 as the benchmark (inclusion of this item in the survey has been agreed).

#### 4.7 Conclusion

The trustee toolkit now covers the complete scope of knowledge and understanding that trustees are required to have to comply with legislation. It provides all trustees with a way to obtain this generic education free of charge at point of use. This is a major step forward from the position two years ago where access to learning opportunities was limited only to trustees of larger schemes.

The Pensions Regulator has now started to evaluate the impact of the online learning programme, although it is too early to judge the full impact on trustee learning and behaviours. Early feedback from trustees and their advisors is very positive. The regulator's perceptions tracker survey in 2007 found that 59% of lay trustees had used the programme and that 89% of them rated it highly in terms of usefulness. Furthermore, the regulator's 2007 survey of scheme governance shows that in 75% of schemes at least one of the trustees had already used the toolkit. This survey confirmed that there is a significant positive correlation between trustee learning and activities that are consistent with good scheme governance. There are, however, still significant variations in the extent to which different schemes access learning, including the toolkit, and the regulator will be targeting its effects at raising the level of participation at those types of schemes where there is less learning activity.

# Appendix 5. QUESTIONNAIRE

# The International Organisation of Pension Supervisors (IOPS)

# **Box 1. Project Objective**

Pension supervisors are increasingly being called on not only to not only perform a compliance enforcement function but also to serve as the focal point for educating those involved in the field about the requirements of the law . This represents perhaps the most important type of programme result because it conceivably prevents any deviation from the requirement of the law from occurring in the first place, presuming that ignorance rather than intent is often the cause of compliance issues. This project seeks to collect information about the purposes, structure and operation of these types of programmes with the goal of developing guidelines and principles of good practice in supervisory education.

# Survey Questionnaire:

# Comparison of Supervisory Education in IOPS Member Countries and Evaluation of Effectiveness and Impact of Pensions Supervisory Education

# March 2006

1. Basic information about you and your agency	
Name:	
Position:	
Agency:	
Country:	
Mailing Address:	
Telephone No:	
Facsimile No:	
E-Mail Address:	

2. Does your agency have any role in the provision of pensions education, outreach and communication?

□ Yes □ No

If answer to Question 2 is 'No' proceed to question 3 If answer to Question 2 is 'Yes' proceed to question 6

3. Please give reasons as to why your agency does not have a role in the provision of pensions education, outreach and communication.

4. How does the industry community you supervise obtain the information it requires to enable it fulfil its obligations and on matters pertaining to pension legislation.

5. How does your agency address the situation where elements of the industry community you supervise fails to understand their obligations or the pension legislation

If answer to Question 2 is 'No' the Questionnaire is completed at this point. Thank you for taking time to complete this part of the questionnaire

Proceed If answer to Question 2 is 'Yes'

7.	7. Who are the target groups of the supervisory education offered by your agency?	
	Trustees	
	Fiduciaries	
	Sponsoring employer	
	Plan administrators/managers	
	Pension practitioners/Professional advisors	
	Scheme members/beneficiaries	

56

8. What are the forms and content of pensions education, outreach and communication provided by your agency? Check all that apply.	
<u>Information Services</u> - (scheme members, beneficiaries, employers, practitioners, managers, trustees, fiduciaries)	
<ul> <li>Information booklets</li> <li>Information presentations</li> <li>Newsletters</li> <li>Online services (please specify)</li> </ul>	
<ul> <li>Enquiry services</li> <li>Outreach programmes (please specify)</li> </ul>	
□ Other (please specify)	
<u>Technical Guidance Services</u> – (pension practitioners, professional advisers, plan administrators , trustees, fiduciaries)	
<ul> <li>Guidance notes on governing legislation</li> <li>Newsletters</li> <li>Technical enquiry services</li> <li>Information presentations</li> <li>Outreach programmes (please specify)</li> </ul>	
□ Other (please specify)	
Trustee/Fiduciary Support Services	
<ul> <li>Handbooks</li> <li>Codes of Practice</li> <li>Training Courses</li> <li>Trustee Enquiry Services</li> <li>Outreach Programmes (please specify)</li> </ul>	
□ Other (please specify)	

9. Evaluation of effective	ness of information services
Description of the	
service provided	
*	
What is the purpose of	
the intervention on the	
part of the supervisor?	
(E.g. to promote	
provide security of	
schemes, to provide	
authoritative guidance	
to practitioners,	
information, and	
support, on pensions	
related matters to a	
wide range of parties	
including scheme	
members, pensioners,	
trustees and the general	
public.)	
How do you assess the	
effectiveness of the	
service?	
XX 71	
What are the costs	
a. to the supervisor	
b. to the target	
audience	
с.	
What is the impact of	
the intervention?	
Other relevant	
information (if any)	

10. Evaluation of effectiveness of technical guidance services	
Description of the	
service provided	
I	
What is the purpose of	
the intervention on the	
part of the supervisor?	
(E.g. to promote	
security of schemes, to	
provide authoritative	
guidance to	
practitioners)	
How do you assess the	
effectiveness of the	
intervention	
What are the	
costs/savings	
a. to the supervisor	
b. to the target	
audience	
What is the impact of	
the intervention	
0.1 1	
Other relevant	
information (if any)	

11. Evaluation of effective	eness of trustee/fiduciary support services
Description of the	
service provided	
-	
What is the purpose of	
the intervention on the	
part of the supervisor?	
(E.g. to promote	
security of schemes, to	
provide authoritative	
guidance to	
practitioners vide	
guidance for	
trustees/fiduciaries on	
their duties and	
responsibilities in	
relation to scheme	
administration, to	
provide codes of	
practice on specific	
aspects of trustees/fiduciaries	
duties)	
How do you assess the	
effectiveness of the	
intervention	
What are the	
costs/savings	
c. to the supervisor	
d. to the target	
audience	
What is the impact of	
the intervention	
Other relevent	
Other relevant	
information (if any)	

# 60

12. Training needs analys	is
How do you assess the	
training needs of	
Practitioners	
<ul> <li>Trustees</li> </ul>	
• fiduciaries	
in your country?	

Thank you for taking time to complete this questionnaire

