Event report
December 2013

Pensions automatic enrolment: the lessons for small and medium-sized employers
Championing better work and working lives

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To increase our impact, in service of our purpose, we’re focusing our research agenda on three core themes: the future of work, the diverse and changing nature of the workforce, and the culture and organisation of the workplace.

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**WORKFORCE**
Our focus on the workforce includes demographics, generational shifts, attitudes and expectations, the changing skills base and trends in learning and education.

**WORKPLACE**
Our focus on the workplace includes how organisations are evolving and adapting, understanding of culture, trust and engagement, and how people are best organised, developed, managed, motivated and rewarded to perform at their best.

About us

The CIPD is the professional body for HR and people development. We have over 130,000 members internationally – working in HR, learning and development, people management and consulting across private businesses and organisations in the public and voluntary sectors. We are an independent and not-for-profit organisation, guided in our work by the evidence and the front-line experience of our members.
Pensions automatic enrolment: the lessons for small and medium-sized employers

Contents

Executive summary 2

1 Background to automatic enrolment 5

2 The CIPD event on pensions auto-enrolment for small and medium-sized employers (SMEs) 6

3 Case studies 12

4 Comment from the Chartered Institute of Payroll Professionals and the Pensions Management Institute 15

5 Survey on automatic enrolment progress 16

Useful links 20

A report based on issues discussed at a Reward Forum workshop organised by the Chartered Institute of Personnel and Development

The pensions auto-enrolment for small and medium-sized employers workshop

CIPD Head Office, Wimbledon – 19 September 2013

Conference organiser: Charles Cotton

Report author: Janet Egan
With the first critical wave of pensions automatic enrolment recently completed among the UK’s largest employers, the spotlight now turns to the challenges faced by small and medium-sized employers in implementing the roll-out of this programme.

The Government’s flagship pensions reform aims to encourage millions more workers to save towards their retirement – backed by an increased onus on employers to help shoulder the administrative and cost burden.

The auto-enrolment regime compels employers to have in place suitable workplace pensions arrangements to which they must contribute and to automatically enrol eligible workers, albeit individuals can choose to opt out of the scheme. The process started in October 2012 and is gradually rolling out to employers over a five-year period.

Earlier this year, a CIPD report looked at the broad issues involved in auto-enrolment – with an inevitable focus on the experience of larger employers, given that they have been first in line to be charged with delivery of the new statutory requirements (see Useful Links section).

That report also highlighted the increasing awareness of the inadequacy of many current workplace pension arrangements – attributable largely to a combination of rising life expectancy, poor returns on share-based investments and the decline in provision of defined benefits (particularly final salary) schemes among many employers.

This latest CIPD research on automatic enrolment aims to build on our earlier work by drawing out the ramifications of this far-reaching initiative specifically for small and medium-sized enterprises (SMEs).

The report includes an account of the CIPD event on pensions automatic enrolment for SMEs held on 19 September 2013, together with supplementary material gained subsequently via telephone interviews and by survey analysis.

**Key points**

The central themes to emerge from the CIPD’s current research programme on pensions automatic enrolment for SMEs include the following:

- **Evaluation of pre-existing pension schemes** – the evaluation of existing pensions schemes (to assess whether they meet the statutory requirements for auto-enrolment) may be less time-consuming for many SMEs compared with larger firms. This is because, as detailed by speakers at the CIPD’s seminar, there may be simpler organisational and pension structures in place or indeed no workplace scheme at all on offer (other than a single stakeholder pension scheme in certain firms – which may itself qualify to meet the requirements of auto-enrolment).

- **Assessing individual worker eligibility** – similarly, assessing worker eligibility for auto-enrolment may amount to a less onerous process for at least some SMEs, especially if their workforce structure is relatively simple.

- **Choosing pensions schemes** – selecting a new qualifying pension scheme can be a thorny issue for SMEs given the time and effort typically involved in getting to grips with the statutory framework and translating it into practice – potentially including tasks such as shopping around for suitable pensions providers or deciding whether to opt for the National Employment Savings Trust (NEST) scheme (this scheme has a public service obligation that it must by law offer cover to all UK employers who choose to use it).

Where a workplace scheme already operates – and an arrangement can be made with the provider simply to extend such arrangements to those individuals newly entitled under the pensions auto-enrolment regime – this may be a fairly straightforward process and for some the obvious option. However, in a theme that emerged among several workshop participants, smaller firms should be aware that some pension providers may not be willing to offer provision to workers who are likely to prove less profitable. Therefore, SMEs may only have limited choices over which pension scheme to adopt and in this context need to consider how much time they are willing to devote to the selection process.

Executive summary
• **Determining contribution levels** – more challenging for some SMEs than the choice of a pension scheme itself is the decision-making process around determining appropriate employer and employee contribution levels – for example, whether to set rates at the minimum required of the employer or to go beyond those levels. In particular, a choice may have to be made between whether to set up a harmonised system (matching arrangements for those who newly qualify for automatic enrolment with those already enjoyed by pre-existing pension scheme members) or to adopt an alternative, typically less generous, scheme for new joiners. The CIPD’s survey data finds that large firms have so far tended to favour this latter approach. However, a concern expressed among some of our SME case study employers is that – while obviously cheaper – this arrangement could be detrimental to workforce morale due to perceptions of unfairness surrounding what could be termed a ‘two-tier’ system.

Defining the basis of that contribution may also be a challenge. Should an employer opt to base it on qualifying earnings, which includes fixed pay, variable pay and statutory payments or go for the administratively simpler, but potentially more expensive, option of basing contributions just on salary? If an employer has been using salary as a basis for pension contributions, should it stick with this approach or move to a new definition? If a new definition, will this apply to existing scheme members as well as those newly enrolled?

• **Access to specialist resources** – some of the issues affecting auto-enrolment in general may hit SMEs with greater severity simply because of their lack of resources compared with larger firms. They may, for instance, have no access to a dedicated HR function or pensions specialists and have to rely on external consultancy for support. The CIPD’s survey findings showed that among those who had already gone through automatic enrolment, the main sources for advice, information and guidance had been pension provider, pension adviser and the Department for Work and Pensions. For SMEs, it may be that they are unable to access the same support from pension providers and advisers and will have to seek support elsewhere.

• **Affordability** – many SMEs are likely to be acutely aware of the costs of automatic enrolment – especially given that the administrative costs may be less easily absorbed compared with their larger counterparts. In addition to the financial burden of pensions administration, of course, the employer pension contributions themselves need to be paid for. Responses identified by our survey to help afford the onset of automatic enrolment contributions include the freezing or moderating of pay rises, reducing other elements of pay, and increasing prices.

• **Communications and financial education** – effective communications between a wide range of individuals and organisations is essential for successful implementation of auto-enrolment in SMEs, especially as they may rely on a diverse range of external providers to support roll-out (for example, pensions providers and payroll firms). Findings from our case study organisations suggest that, to ensure effective communication with individuals, it is often important to go beyond the statutory requirements on communication and find ways to engage with the specific demographic of the workforce.

• **Data quality and data security** – many SMEs will need to check the accuracy of their workforce data (for example individual age and earnings data), with some case study employers reporting adjustments to workforce information systems. Protecting data security is also a critical issue, though this may be less problematic in some small firms – if, for example, based on a single site with less need to transfer information around different departments, systems or geographical locations.

• **Wider HR/reward context** – employers should consider the impact of auto-enrolment on wider HR/reward strategy and policies and workforce administrative arrangements. Our research indicates there may be implications, for example, for the induction process: should the organisation reduce its probationary period for new employees to coincide with the auto-enrolment date, should it use the three-month postponement or should it enrol employees into the pension on day one but still have a probationary period for other purposes? Or what happens to eligible jobholders who start off as non-permanent and are put onto a weekly payroll who then subsequently become permanent and transfer to a four-weekly payroll – will the organisation be able to pro-rate contributions or will it have to amend its temporary-to-permanent policy? Or is a process in place to capture eligible jobholders who are paid through accounts payable?
• **Planning** – the need to plan ahead to ensure successful and timely implementation of pensions automatic enrolment is a theme that comes across strongly throughout our research programme. This is especially prominent given fears over a potential capacity crisis in the pensions industry as 30,000 employers push to meet staging dates next spring. Other practical advice includes making use of the wide range of support freely available, for example from the Pensions Regulator’s website.

• **Benefits of automatic enrolment** – the central benefit of automatic pension enrolment will be if the programme succeeds in the Government’s stated aim of ensuring workers have a more financially secure retirement and so are less likely to be a burden on taxpayers. Where implemented and communicated effectively, the positive benefits of the new arrangements among employers in our research include having a company pension that is: aligned to a firm’s business objectives, its approaches to culture, talent and brand; is integrated with its reward package; and meets the needs of its employees.
Pensions automatic enrolment: the lessons for small and medium-sized employers

At its heart, the automatic enrolment regime requires employers to enrol all workers over the age of 22 and below state pension age who currently earn £9,440 or more annually into a qualifying pension scheme. However, the legislation is complex: for example, it also places requirements on employers in respect of other groups of workers and encompasses a number of administrative duties required of employers.

Pensions auto-enrolment is being rolled out gradually over a number of years – with individual employers given their own staging date (when auto-enrolment is launched in their organisation) linked to organisational size based on the size of the employer’s major PAYE scheme as at April 2012. The implementation process commenced with the largest employers in October 2012 and is being phased in until reaching the very smallest employers in October 2017 (with new companies created between now and that date staging up until February 2018).

The legislation specifies certain minimum total contribution levels, including the minimum level that must be contributed by the employer – with the remainder of the contribution to be paid by the worker. However, employers can choose to adopt more generous arrangements if they wish – for example operating non-contributory schemes whereby the entire minimum total contribution is paid by the employer.

For individuals who are automatically enrolled into defined contribution schemes, the initial minimum contribution level is set at 2% in total – including a minimum employer contribution of 1% on ‘qualifying earnings’ between £5,668 and £41,450 per annum. The minimum total contribution rises to 5% from October 2017, including a minimum 2% contribution by the employer. From October 2018, the minimum contribution rises to 8% in total, including a minimum contribution of 3% by the employer. Further details of the statutory background are embedded in the body of this report, though space limitations preclude it from providing a comprehensive guide: full details are available via the Pensions Regulator website.

As part of our research programme, the CIPD commissioned YouGov to incorporate a specialist section on automatic enrolment into its autumn 2013 Labour Market Outlook survey of employers in partnership with SuccessFactors, an SAP company (see page 16). The findings provide a backdrop to the individual accounts of employer experiences presented at the CIPD’s workshop and during subsequent telephone interviews.
The CIPD Reward Forum event held on 19 September 2013 brought together delegates and speakers from a wide range of organisations involved with automatic enrolment together with representatives from SMEs charged with implementing the programme in their own organisations.

The Pensions Regulator: auto-enrolment – the rules and regulations
Charles Counsell, executive director – automatic enrolment, at the Pensions Regulator, commenced with an account encompassing both progress to date and the challenges ahead for SMEs. The Pensions Regulator is the public body responsible for maximising compliance with pensions automatic enrolment among UK employers. Through this programme, ‘the Government ultimately hopes to help 8–10 million individuals to save for retirement who are not currently doing so’, noted Charles Counsell in explaining the rationale behind the regime.

The role of the Pensions Regulator in all this is largely ‘about regulation and enablement’ and Charles Counsell hopes it is ‘helpful on the journey to staging date and beyond’. That said, the body has powers to enforce should things not go to plan, he warned, adding ‘it’s important another employer is not gaining any advantage by not complying’.

Turning to the question of ‘what’s happened so far?’, Charles Counsell noted that, by the time of the event in September 2013:

- More than 1,100 employers ‘have been all through the process including registering – which may be likened to the final part of the enrolment process’, albeit ‘not the end of the duties’.
- More than 6.7 million workers have in effect gone through the process of automatic enrolment.
- Within this group, over 1.5 million eligible jobholders have been automatically enrolled.

Drawing on a recap of experience and progress to date, attention turned to ‘the challenges ahead’ for SMEs. The key dates are April/May and July 2014 – during which period alone a total of some 30,000 employers have staging dates that ‘will have had less to do with pensions than larger employers and may need to get advice on pensions requirements’. Charles Counsell warned of a ‘need to be careful about the capacity of the pension industry and adviser availability’.

Key lessons learned
‘The one message that comes through time and time again is: start to plan this as early as possible,’ observed Charles Counsell. Each employer ‘will have its own unique challenges depending on its structure – we advocate starting 18 months ahead’ or, if the organisation is less complex, 12 months might suffice.

It is important to set up a plan and to ‘know your staging date – we have a staging date tool you can go to’ – as ‘some employers think they know their staging date because they count the numbers of employees on the payroll – but this doesn’t necessarily do it…the individual staging date is determined by numbers on the largest PAYE scheme at April 2012 – so check for the definitive answer’.

Charles Counsell advises employers to choose pensions providers as soon as possible as ‘those who’ve done that some way in advance find the process much smoother – seek advice from providers six months in advance if you can.’ Similarly, timeliness in the selection of a software supplier is important – ‘the place to start is to look at who your payroll supplier is and check with them that they will do automatic enrolment.’

A summary of the key lessons that emerged from this presentation include:

- Start planning early.
- Know your staging date.
- Choose and agree scheme and software providers at least six months before staging date.
- Test processes and software – make sure everything works.
- Ensure effective communication.
- Use the Pensions Regulator’s website.

KPMG: auto-enrolment experiences for small and medium-sized employers
Consultancy firm KMPG’s Andy Seed, director – DC solutions tax and pensions, gave a helpful summary of the statutory requirements backed up by practical examples of lessons learned to date from the experiences of his firm’s clients – all focusing on the implications for SMEs.
The presentation commenced with a recap of the duties on employers to undertake the following in respect of pensions auto-enrolment:

1. Communicate with UK employees regarding automatic enrolment and opt-out rights.
2. Automatically enrol ‘eligible jobholders’ into a qualifying pension scheme if not already members.
3. Deduct member contributions and make employer contributions.
4. Keep records in relation to each qualifying pension scheme and each jobholder.
5. Enrol non-eligible jobholders and entitled workers who opt in to a pension scheme and make contributions for non-eligible jobholders.
6. Register with the Pensions Regulator, giving details of the qualifying scheme and the number automatically enrolled.
7. Re-enrol opted-out employees broadly every three years.

In respect of communications, it was pointed out, employers must ‘be careful on opt-out’ as by law they must not induce individuals to do so. In the past, for example, some employers have operated schemes whereby individuals ‘may receive a higher hourly pay rate if they are not members of the pension scheme – but employers cannot do so any longer as this could be seen as an inducement to opt out’. (Safeguards in relation to ‘inducement’ were switched on for all employers in July 2012.)

Andy Seed moved on to discuss the treatment of different types of worker and key assessment dates under the regime.

For the purposes of compliance, there are three types of worker, linked to earnings levels:

- eligible jobholders (those currently earning £9,440 or more per annum) – individuals in this group must be automatically enrolled
- non-eligible jobholders (those earning more than £5,668 but less than £9,440 per annum) – these workers have the right to opt in and if they do so the employer must contribute
- entitled workers (earning below £5,668 per annum) – this group have the right to join but the employer does not have to contribute.

And ‘there are four “key assessment dates” for employers to be aware of’ explained Andy Seed: the staging date; individual earnings breaching the qualifying earnings threshold; a young worker reaching the age of 22; and any new joiner to the workforce. (Another key date is the deferral date, that is, the end of a postponement period.)

This account also encompassed a look at workforce audit and job definitions linked to identifying workers and jobholders, with a particular focus on:

- Who is a worker?
- Who is paid via PAYE versus accounts payable?
- Is there a process to capture workers who are non-PAYE?

### Contribution levels

Andy Seed then looked at how firms could determine the employer and employee contribution rates. A key part of the test is that contributions are a minimum of 1% of qualifying earnings (between £5,668 and £41,450). Qualifying earnings include basic pay, bonuses, commission and overtime as well as statutory payments, such as sick or maternity pay.

Table 1 shows the minimum contributions during the phasing in of automatic enrolment – stated as a percentage of qualifying earnings (though employers can choose to go beyond these arrangements, for example by paying more and/or making the scheme a non-contributory one).

<table>
<thead>
<tr>
<th>Date</th>
<th>Minimum employer contribution</th>
<th>Employee contribution (assuming employer pays minimum employer contribution)</th>
<th>Total minimum contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>From staging date</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>October 2017</td>
<td>2</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td>October 2018</td>
<td>3</td>
<td>5</td>
<td>8</td>
</tr>
</tbody>
</table>
Alternative certification approaches are as set out in Table 2. For instance, an employer may decide to use basic pay, as that is what pension contributions have been based on in the past, or decide that it will be too complex to use qualifying earnings as it includes other elements of fixed, variable and statutory pay.

Firms will need to assess that their contributions to their defined contribution plan are sufficient and certify that the minimum requirements are met.

Turning next to the experiences of KPMG clients, some key themes were:

- Many (if not all) clients would have preferred to start their project earlier. If SMEs wish to keep their options open, they should start early so they ‘don’t discover at the last minute their favoured pensions provider won’t take them’. It is also important to remember that, despite its statutory obligation to provide automatic enrolment for any employer, ‘NEST will need time too’ if this is the route employers wish to go down.
- Some policy decisions may be easier/harder than first thought, for example the choice of which pensions scheme to use for the auto-enrolment process has been easier where there is an existing scheme, whereas decisions around contribution strategy/design have generally been much harder to agree.
- Providers are making some process points more painful than they need to be, for example with the paperwork for making existing schemes qualifying schemes and automation of communications materials more complex than they need to be.
- There is a significant debate over who will ‘own’ processing responsibility: providers are charging and putting liability caps in place for their ‘hub’ solutions, while payroll firms are charging for build without necessarily having a complete understanding of requirements.
- Employment/pensions consultations put some employers off from harmonising schemes.
- Communications (in particular postponement notices) can be somewhat clunky.

Andy Seed moved on to draw out the implications of the current experience – both positive and negative – for SMEs.

**Positive points**
- Technology solutions should be far better established.
- Simplification of rules (anticipated in the Pensions Bill) will be helpful and timely for many.
- Less complex workforce structures to manage typically – while this was acknowledged to be ‘a sweeping generalisation…there won’t be as many multiple payrolls’.

**Negative points**
- ‘Twin peaks’ of March–May 2014 triggering capacity concerns
- In-house resources to deliver the project likely to be much smaller (in some cases, this is just one individual)
- Less appetite to pay advisory fees for support.

**McDonald’s: learning the lessons of how low opt-out rates can be achieved via automatic enrolment**

The penultimate presentation came from Neal Blackshire, benefits and compensation manager with McDonald’s Restaurants. He offered delegates a unique insight into pensions automatic enrolment, given his experience with two differing organisational size categories – both the parent company and its smaller franchisee organisations – backed up with useful tips.

As a larger employer, McDonald’s itself had a staging date of 1 January 2013 – and is currently aiming to assist its franchised outlets as far as possible to work towards their own individual staging dates while recognising that as independent firms ‘automatic enrolment is their responsibility’. 

<table>
<thead>
<tr>
<th>Qualifying schemes</th>
<th>Certification basis</th>
<th>Tier 1</th>
<th>Tier 2</th>
<th>Tier 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pensionable pay definition</td>
<td>At least basic pay</td>
<td>Tier 1</td>
<td>Tier 2</td>
<td>Tier 3</td>
</tr>
<tr>
<td>Employer minimum contribution</td>
<td>4</td>
<td>3</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Total minimum contribution</td>
<td>9</td>
<td>8</td>
<td>7</td>
<td></td>
</tr>
</tbody>
</table>
McDonald’s directly employs some 1,750 salaried staff together with around 35,000 hourly paid workers. Among the hourly paid group, some 15,000 are aged over 22, including around 12,000 with annual earnings above the earnings threshold for automatic enrolment.

The company’s 160 franchisee organisations, meanwhile, employ around another 57,000 individuals. Of these, 63 franchisees use the company payroll service while 97 use a variety of payroll providers, including in-house provision. Where franchisees use the parent company payroll service, ‘that makes it easier for those firms’ in respect of capitalising on the parent company’s support for automatic enrolment, observed Neal Blackshire.

The first engagement with the auto-enrolment process at McDonald’s came in September 2009 when the firm ‘got a feel for’ auto-enrolment via a research exercise and by meeting with representatives from the Personal Accounts Delivery Authority (PADA), the organisation that subsequently became the National Employment Savings Trust (NEST) (see Useful Links section for more details).

During late 2010, a project team was set up to look at employee benefits strategy in light of automatic enrolment, bringing together team members from across the parent company – including the reward, payroll, legal, communications and finance functions – as well as external consultants and two representatives from franchisee organisations.

The company began to look at pension provider selection in March 2011 – weighing up whether to have one or more provider – including a closer examination of the NEST scheme. Coincidentally, at around the same time, the provider of the company’s pre-existing stakeholder pension scheme announced its departure from the market. This defined contribution scheme had been available to salaried staff, although over 1,000 had failed to join – meaning there had been ‘less engagement with that than we would have hoped’.

As a result of this evaluation process, a decision was taken to adopt NEST for the purposes of automatic enrolment for hourly paid employees while introducing a replacement stakeholder scheme with Friends Life for salaried staff. The recommendations were made to the business in September and confirmed in October 2011.

During 2012, an evaluation of ‘middleware’ system providers to handle the processing of the pension arrangements established that some options seemed relatively underdeveloped, leading the project team to whittle down the options to a shortlist of just three possible providers. The team drew up a list of technical questions – the questions were ‘boring as hell’, quipped Neal Blackshire, but necessary to ensure the systems’ resilience (such as capacity to upload workforce data). Ultimately the employee benefits consultancy JLT was selected to meet the company’s needs in terms of providing a benefit management system called BenPal (featuring the capacity for employees to opt in, opt out or opt up on automatic enrolment).

As the ensuing communications process got under way, this threw up its own challenges – for instance, clearly branches are ‘very geographically dispersed, so meetings are hard to organise’.

In respect of contribution levels, the company’s arrangements for salaried staff reflect those enjoyed under the previous scheme. While staff are automatically enrolled at the 1%:1% level, they have the ability to ‘opt up’ to a minimum 3% employee contribution. If they do this, they will be able to take advantage of the previously available scheme options: employer matching of 1:1, 1.5:1 or 2:1 dependent upon age and service (to a maximum 10% employer contribution) as well as enhanced life assurance and a long-term disability benefit. Hourly paid employees are automatically enrolled at 1%:1% of qualifying earnings: there was no previous company contribution available for this group.

The time and resources put into the provider selection, implementation and communication of pensions automatic enrolment at McDonald’s have proved effective, as illustrated by the outcomes achieved to date.

The results of the auto-enrolment programme for the parent company are encouraging: the processes have generally run as expected and the company has automatically enrolled over 11,500 hourly paid and more than 1,150 salaried individuals.

The opt-out rates are low to date – standing at the time of the CIPD event in September 2013 at just 2.2% among hourly paid and 3.5% for salaried staff (with almost as many of the latter group opting up to enhanced contributions).
It is as yet early days for the company’s franchisees – the earliest to ‘go live’ had staging dates of 1 September 2013, with guidance and assistance provided where required by the parent company. It is, however, believed that franchisees will benefit from the systems that have now been established and relationships already created.

McDonald’s has held a number of open sessions to assist its franchisees to implement auto-enrolment in their organisations. These sessions comprise a range of presentations on: payroll processes (provided by McDonald’s) and NEST set-up (with a speaker from NEST), together with legislative responsibilities, employee communications and a demonstration of BenPal (by JLT) – all backed up by break-out sessions.

The initial open session for franchisees using the company payroll was held in July 2013 with others planned for December 2013 and spring 2014. Overall, the messages that emerge from the pensions automatic enrolment experience at McDonald’s include:

- Allow plenty of time for planning.
- Seek external help and advice.
- An internal collaborative approach is vital.
- Keep it simple.
- Get your data as clean as possible as soon as possible.
- Choose the communication timing and style that best suits your organisation and culture.
- Don’t expect all the hard work to finish at the staging date.

**Learning from the introduction of auto-enrolment at Asos**

The final case study presentation was from Andrea Pattico, head of people, and Scott Baker, reward and HRIS manager, with Asos – an online fashion retailer headquartered in Camden in north London. The company’s pre-existing pension scheme forms part of its flexible benefits scheme – known as Extras – which gives employees the opportunity to select from a wide range of benefits to help personalise their reward package.

The company has almost doubled in size very rapidly (employee numbers increased from approximately 800 last year to around 1,400 this year) and has a youthful demographic – with an average age of just 30.

‘Asos moves at lightning speed,’ observed Andrea Pattico in her opening to the presentation, setting the scene for the central theme of how the company’s pensions design and communications plans needed to fit within its innovative culture and youthful demographic.

The company’s staging date was set for October 2013 and ‘in typical Asos style we started preparing in 2012!’ as it is ‘not the type of business to start early’. It was, however, acknowledged that the company was ‘very fortunate’ in having a ‘flexible benefits scheme in place that had the right pensions scheme’ – that is, one that qualified for automatic enrolment. The initial activity took the form of speaking to the current pension provider to ask ‘could we just bolt auto-enrolment onto existing arrangements?’

A decision was taken to extend the pre-existing scheme arrangements – including the use of matched contributions of 2% from the employer and 2% from the individual (rather than introducing a lower 1% and 1% arrangement as it might have opted under the minimum statutory requirements). This is because of its overriding desire for equal arrangements to cover the entire workforce.

The company looked to work in partnership with the four external providers involved to deliver auto-enrolment within 12 months.

Given the effective reward structure already in place, ‘the key thing was that we had one branding and one style of communications that would appeal to our key demographic’. The encouragement of as high a take-up of auto-enrolment as possible would, it was recognised, involve a need ‘to redesign and to communicate internally’ – for example speaking ‘as one would to friends’ rather than any overemphasis on words such as ‘entitled’ that tend to feature heavily in statutory communications material.

To ensure relevance to Asos employees, it was important to engage with the providers as it was ‘very important they understood our demographic – and so important we deliver messages in its branding and communications within the overall benefit offering, not just automatic enrolment’.

While acknowledging that it is as yet early days for Asos in its journey to full auto-enrolment implementation, the company can boast a number of achievements to date, including that it has:

- engaged employees in its reward awareness seasons – the total package, not just pensions
- increased flex allowance by more than 2%, which ‘meant something to employees who were about to hear about auto-enrolment’
• targeted communications suited to a wide demographic
• run a benefits fair including its pensions partner.

In respect of the benefits fair, Scott Baker explained that this was ‘a real success – lots of people having lots of engagement with pensions’.

The company broke the auto-enrolment project into two parts, one for existing staff and one with new joiners. To take account of new joiners the company arranged a postponement date three months later. This was partly to allow for communications to be conducted to get across the message: ‘auto-enrolment is coming.’

While it is as yet too early to evaluate the efficacy of automatic enrolment at Asos, the early signs are encouraging in terms of strong engagement across the workforce as well as effective collaboration with partner organisations.

Concluding the event
The event’s proceedings concluded with an informative question and answer session. One especially pertinent final discussion centred on how the case study companies had made key decisions over pension provision.

Andrea Pattico mentioned that that choice in her organisation was driven by the fact that the ‘existing scheme worked very well, and having two sets of schemes would not work for Asos – we are led by our culture and that’s what drove our decisions’.

KPMG’s Andy Seed suggested that it is often an obvious choice for smaller employers to simply expand their current workplace pension provision, where one exists, to new members. This is, in part, because it may be difficult for smaller companies to attract the interest of new pensions providers. So the question SMEs might wish to ask themselves is: ‘What is our appetite to spend time looking for pension providers?’
3 Case studies

Moog (UK) replaces multiple pension schemes with single plan in preparation for automatic enrolment

In a drive to attain compliance with automatic enrolment – while minimising complexity and attaining cost savings via economies of scale – precision control firm Moog has introduced a harmonised group personal pension plan across its UK sites.

Moog is a worldwide designer and manufacturer of precision control components and systems. With its UK headquarters in Tewkesbury, the company has eight sites across the UK employing a total of some 1,200 employees – the majority of whom are full-time, permanent staff.

The CIPD conducted a telephone interview during November 2013 with Helen Buckland, UK benefits consultant at Moog (UK), to discuss progress to date on its preparations for the introduction of automatic enrolment with a staging date of 1 January 2014.

Involvement with the pensions automatic enrolment programme at Moog commenced in late 2011 with steps to enhance the knowledge and skills of the HR function by a trawl of relevant material – for example government documentation. More detailed analysis and preparation for ‘how to roll this out’ across its own workforce started in January 2013, explains Helen Buckland.

Complexity of pension arrangements
Each unit within Moog in the UK operates its own separate PAYE system and, under the automatic enrolment legislation, the staging date for any organisation is linked to the number of employees on its largest PAYE system as at April 2012. For this reason, there were concerns over the prospect that different operating units might be allocated different staging dates – hence unnecessarily complicating the implementation process.

Another salient factor was the operation of more than 13 separate pension plans across the eight sites, including a mix of stakeholder schemes and group personal pension plans featuring a range of employer and employee contribution levels.

In a move designed to capitalise on potential economies of scale, it was decided that the best approach would be to simplify this pension structure and harmonise arrangements as far as possible.

Moog engaged a benefits consultancy to review the pensions market on its behalf, and to present an analysis of which provider could best meet its bespoke needs and ensure that any scheme would qualify for automatic enrolment. A key benefit of this approach was the resultant savings that could be achieved on the annual management charge as a result of economies of scale.

As part of its response to the new requirements, then, Moog introduced a single group personal pension plan covering all its UK sites – ‘so that puts us in a really good position ready for the onset of automatic enrolment,’ explains Helen Buckland.

Much of 2013 has been taken up with agreeing and negotiating the consolidation of all the pension arrangements into a single scheme together with a move to a harmonised staging date. As it was understood that the larger units ‘would be due to implement on 1 January 2014, it has been agreed that we will postpone until 1 April 2014, while the same staging date has also been agreed for the smaller units’ – earlier than would have been anticipated in their case.

Contribution levels and take-up rates
The new pension scheme was introduced in October 2012 across all Moog (UK) sites based on varied total contribution rates between sites (broadly reflecting the previous pension arrangements at each unit). As previously, for example, employees do not have to contribute at two major sites (although they can make top-up payments if they wish). The company has a very detailed system managing its assessments – My Rewards – which will feed into its monthly payroll.

As Helen Buckland points out: ‘Because we already offered pension plans to everyone, including some on a non-contributory basis, we already have a high take-up of over 90%.’ It is anticipated that the current high take-up levels of pension scheme membership will continue with low levels of opt-out once the automatic enrolment process gets under way.

The company plans to roll out detailed workforce communications from January 2014 to ensure all individuals are aware of automatic enrolment in readiness for the 1 April 2014 implementation date.

The ‘biggest challenge’ associated with the shake-up in pension arrangements at Moog has been ‘educating our stakeholders…it can be very hard explaining the complex automatic enrolment process’.

In conclusion, Helen Buckland identifies the strategic benefits obtained via the automatic enrolment initiative: ‘the programme links in well with engagement and employee retention’ and the system ‘will make employees more aware of the issues around financial planning for retirement – pension provision is becoming more important to people’.
Royal Horticultural Society: contribution levels under automatic enrolment harmonised with existing pension scheme

The Royal Horticultural Society (RHS) is the UK’s leading gardening and horticulture charity, with activities including shows, public gardens, retail outlets and science and educational events. The organisation employs around 750 individuals supplemented by some casual staff at peak times – for example, during the run-up to Christmas in its retail outlets or around shows season at its gardening venues – meaning there are ad hoc peaks and troughs in workforce size.

The CIPD conducted a telephone interview during October 2013 with Jo Whittaker, senior business partner with the RHS, to discuss the organisation’s progress to date towards automatic enrolment (AE).

Background
The staging date at RHS was set at 1 October 2013. However, the organisation decided to take advantage of the postponement arrangements permissible under the auto-enrolment regime – by which employers may delay enrolling eligible staff by three months from their staging date – hence the auto-enrolment of staff is due to ‘go live’ on 1 January 2014.

Discussions around automatic enrolment at the organisation commenced during October 2012, including strategic work with its external independent pension adviser. Most of these initial discussions focused on two key areas, whether:

- automatic enrolment could be introduced via the pre-existing workplace pension scheme – a group personal pension plan based on defined contributions
- to simply extend the current arrangements or introduce an additional option for new joiners based on a lower level of employer contribution.

Determining contribution levels
Under the pre-existing scheme at RHS a matrix provides the basis for a range of employer matched contributions, which vary dependant on the employee contribution level and length of service.

Senior-level discussion took place about the possibility of introducing an additional option making 1% or 2% employer contributions – reflecting the minimum arrangements under the statutory provisions of an initial 2% total contribution of which at least 1% must be paid by the employer.

However, a decision was ultimately reached to adapt the existing more generous scheme and extend it to all newly eligible individuals under automatic enrolment. The decision to extend this offer to all is deemed ‘exactly the right thing to do to avoid a two-tier approach’, explains Jo Whittaker.

While a significant cost burden is acknowledged to be associated with this approach, the organisation was driven by the aim “to make it as easy as possible for employees to take up automatic enrolment and to get into the habit of saving”, she explains. For similar reasons, it was decided that individuals would have the option, should they prefer, to enter the scheme at a lower employee contribution rate of 1% or 2% (with the contribution level selected again matched by the employer). The organisation ‘recognise these are not huge amounts but it does not wish to make a judgement on the amount any individual wishes to contribute’ – again, any step to encourage individuals to attain a foothold into saving towards retirement should, it is believed, be encouraged.

Managing workforce data
In a move unrelated to automatic enrolment, meanwhile, the organisation introduced a new combined payroll and HR database in April 2013, which is still in the building process. It has also recently conducted a full review of its reward offering.

RHS is working with Aviva (which has provided a new software application to manage automatic enrolment) in obtaining its guidance around timescale for the implementation of auto-enrolment and how the new software application AME (Auto-enrolment Manager for Employers) supports the process, as well as the opt-out process for workers who decide they do not wish to participate.

The data-checking for automatic enrolment (for example, when people reach the eligible age or earnings level) is undertaken automatically via the AME system, which is deemed essential for ease of operation. There have not been any perceived data security issues as the responsibility for handling the data remains with the same pension provider as previously. Similarly, data-cleansing has not proved an issue to date, although the organisation is having to obtain certain information – such as email addresses – not held previously on some of those newly covered.

Communications and lessons learned
The communications process in support of automatic enrolment commenced relatively early: during summer 2013, the organisation sent out introductory information via email and arranged for its independent pensions adviser to visit its various sites. There has been a degree of apathy to date in response to the communications, it is acknowledged, but it is anticipated that interest will grow as implementation nears.

Moreover, it was expected that a November 2013 workshop scheduled to follow up the initial communications programme would attract greater engagement – as this would coincide with the dispatch of formal notices about automatic enrolment across the workforce.

Lessons learned at RHS to share with other small and medium-sized employers on automatic enrolment include the need to make use of trusted external advisers to bring in expertise – the organisation’s project manager at Aviva has proved very helpful in addition to its external pensions adviser (who has a long-standing relationship with RHS and understands its business and culture well).
The communication process can prove challenging for SMEs – for example, they may lack a dedicated reward or communications function while not all workers have access to computers in certain types of businesses. RHS is continuing to take steps to engage with all individuals – including the deployment of posters at site level.

Several advantages are deemed to be associated with the organisation’s decision to take advantage of the postponement arrangements under the auto-enrolment regime. As a smaller organisation with limited resources, this helped ‘to give us more time’ for planning and implementation. An additional benefit was that this dovetailed neatly with existing probation arrangements – whereby people who join the organisation have traditionally been able to join the pension scheme only after their three-month probation period is satisfactorily concluded. While these new joiners ‘could opt to join earlier anyway’, as Jo Whittaker points out, this arrangement ‘looks and feels the same as the three-month period for people on probation – it makes sense to allow a gap’.

Finally, it is important not to assume that external agencies will ‘do it all for you’ or that their standard process will work with your current systems – it is essential to ensure that the right support and systems are in place and to take time to check the systems, for example ensuring that IT systems are fully compatible and tested.

In respect of strategic benefits of automatic enrolment, the RHS believes its current competitive package – including the harmonised contributory pension scheme offered via auto-enrolment – is likely to have a positive impact in respect of employee engagement and talent management. Despite the ‘financial hit’ associated with its automatic enrolment decisions, the organisation is clear it did not wish to operate a two-tier pension arrangement and believes it has ‘done the right thing’ for its workforce.
Comment from the CIPP and the PMI

Following the automatic enrolment workshop, the CIPD conducted telephone interviews during October and November 2013 with Karen Thomson, associate director of policy, research, and strategic visibility with the Chartered Institute of Payroll Professionals (CIPP), and with Tim Middleton, technical consultant at the Pensions Management Institute (PMI).

The aim was to obtain additional specialist input to our automatic enrolment research programme.

SMEs need to assess whether they have the expertise to undertake the work involved for the auto-enrolment process, explained Karen Thomson. ‘If they don’t’ – and where a workplace pensions scheme is already in operation – ‘they should contact their pensions provider to try to avoid incurring charges from IFAs,’ she suggested.

If no current qualifying scheme is in place, SMEs will need to search for a suitable scheme and to consider certain key questions. One is ‘how to find a competitive scheme’ – which will become harder the less time they have left to negotiate with providers in good time to meet their staging date.

Employers should also consider whether the organisation is a ‘paternal’ one. According to Karen Thomson, the goal of Pensions Minister Steve Webb is ‘to encourage not just compliance but the introduction of good-quality schemes’ – adding that if firms leave it until the last minute they are less likely to achieve anything beyond the former.

Smaller firms need to be aware that there ‘may be a number of pensions providers that are not interested in them’ as they would be insufficiently profitable. NEST, of course, is open to all UK employers, but if SMEs wish to consider alternatives – potentially providing better value or more bespoke solutions to their organisation’s needs – they need to act quickly. This is especially important as the pensions industry is likely to experience capacity issues in the coming months and years with so many auto-enrolment projects under way.

The CIPP’s recommendation is that employers start planning a ‘minimum of 12 months ahead of their staging date’. Even if they have secured the services of a pension provider, they need to consider the reporting requirements to the Regulator, including the need ‘to register and provide lots of data’ – there is a ‘misconception that the provider will do that’. It may be that a willing intermediary will take on this workload, but this must be arranged as the employer is the responsible party.

‘Any employer should make sure to plan well in advance,’ advises Tim Middleton. In respect of small and medium-sized employers, in particular, he adds ‘we suggest preparations commence 18 months prior to the individual organisation’s staging date’.

Part of the reason this lengthy timescale is recommended is ‘because of a very great demand among smaller employers for the pensions advisory sector serving that end of the market’. This is likely to lead to a capacity issue in the pensions industry, Tim Middleton warns – adding it may well become ‘harder and harder to find advisers’ willing to take on new business among SMEs.

Payroll must also be kept abreast of developments, says Karen Thomson. If setting up a new scheme, the function ‘must have the ability to produce a schedule report(s) of contributions to the pensions provider which will require payroll software intervention… different pension providers unfortunately require different formats.’ The input of payroll is deemed critical as it is the function likely to maintain information on age and earnings levels that are centrally important to the automatic enrolment process.

As Karen Thomson observes, it is important for HR and payroll ‘to liaise effectively to ensure accuracy of workforce data’ – for example, accuracy of NI numbers is critical.

The recently implemented RTI (real-time information reporting of PAYE) regime means that ‘a huge data-cleansing exercise should have been undertaken’ and ‘RTI was an extremely good leg up to automatic enrolment’, concluded Karen Thomson.
5 Survey on automatic enrolment progress

As part of our latest research programme, the CIPD commissioned YouGov to incorporate a specialist section on automatic enrolment into its autumn 2013 Labour Market Outlook (LMO) survey of employers.

The main findings of this research are based on an overall survey of 1,020 HR professionals – of whom 399 based in the private sector additionally completed the supplementary section on pension auto-enrolment. The findings from this latter group are exclusively reported below while the general findings relating to labour market issues can be found in the CIPD’s LMO report (see Useful Links section).

Our analysis here includes a section breaking data down into two categories of organisational size: firms with 1–249 employees and those employing 250 or more. It should be borne in mind that employers with fewer than 250 employees will not be due to stage before April 2014 while some of the larger ones (250+) will also not yet have staged. Those small and medium-sized employers that have already staged are part of larger organisations and so had their staging date early.

Where auto-enrolment had been introduced, around half (51%) of respondents have enrolled eligible jobholders into a different pension scheme from the one that existed before automatic pension enrolment. Contract-based defined contribution (DC) schemes are the most popular choice for auto-enrolment: reportedly introduced or used by 41%, while 13% used trust-based DC and another 13% used defined benefit (DB).

Half of respondents (49%) report that new employees are not eligible to transfer to the old pension scheme that existed before automatic enrolment, although 43% reported that new employees are allowed to transfer.

The single most common average member contribution to their new pension scheme is reportedly in the range from 4–6%. The 4–6% bracket is also the single most common band for employer contributions (Figure 1 sets out a detailed breakdown of member and employer contribution levels).

Over two-fifths (44%) of LMO employers report that at least one employee with their workforce has opted out of the pension scheme since the organisation’s staging date compared with 17% who report that nobody had opted out. Among large firms, only 8% report zero opt-out rates. The most commonly reported figure for opt-out rates was between 1 and 5% of eligible workers opting out. However, four out of ten respondents (39%) did not yet know their opt-out rate.

We asked respondents which areas of their business they had reviewed to ensure that they support their pension arrangements. As Table 3 shows, employers were most likely to have reviewed their pension arrangements to ensure they meet the legal requirements of automatic enrolment.

![Figure 1: Member and employer contribution levels*](image_url)

*Average member/employer contribution as a percentage of salary into the new pension scheme.
Table 3: In light of automatic pension enrolment, has your organisation carried out a review of its pension arrangements to ensure that they support... (%)

<table>
<thead>
<tr>
<th>Category</th>
<th>Yes, we have carried out a review</th>
<th>No, but we plan to in the next 12–18 months</th>
<th>No, we have NOT carried out a review</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meeting the legal requirements of auto-enrolment</td>
<td>56</td>
<td>11</td>
<td>18</td>
<td>14</td>
</tr>
<tr>
<td>The business strategy of the organisation</td>
<td>45</td>
<td>13</td>
<td>24</td>
<td>18</td>
</tr>
<tr>
<td>The needs of its employees</td>
<td>42</td>
<td>16</td>
<td>25</td>
<td>17</td>
</tr>
<tr>
<td>The organisational culture</td>
<td>40</td>
<td>11</td>
<td>31</td>
<td>18</td>
</tr>
<tr>
<td>The reward strategy</td>
<td>37</td>
<td>18</td>
<td>26</td>
<td>19</td>
</tr>
<tr>
<td>The employer brand</td>
<td>37</td>
<td>13</td>
<td>31</td>
<td>19</td>
</tr>
<tr>
<td>Your organisation’s approach to leadership and development</td>
<td>37</td>
<td>13</td>
<td>34</td>
<td>17</td>
</tr>
<tr>
<td>Your organisation’s approach to talent management and development</td>
<td>35</td>
<td>14</td>
<td>31</td>
<td>20</td>
</tr>
</tbody>
</table>

Base: Autumn 2013, all private sector employers (399)

However, there are variations by size. While 74% of large employers have carried out, or are planning, a review to ensure that they meet the legal requirements of automatic enrolment, the proportion for SMEs is 58%. Similarly, while 64% of large employers have carried out, or are planning, a review to ensure that automatic enrolment meets the needs of their employees, the proportion for SMEs is 50%.

Thinking more widely, around half of LMO employers (49%) have reviewed the impact of auto-enrolment on their finances. Just a fifth (19%) have not reviewed the costs impacts of auto-enrolment. Other common reviews include pension communications and HR, payroll and pension administration systems (see Table 4).

Again there are variations by firm size. While 72% of larger employers have, or are planning to, cost the impact of AE on its finances, just 57% of SMEs have done, or are doing, the same. Compared with SMEs, larger companies are more likely to have reviewed, or be in the process of reviewing, pension charges (64% large, 53% SMEs), default funds (63% large, 50% SMEs) and scheme governance (68% large, 49% SMEs).

Table 4: In light of automatic pension enrolment, has your organisation reviewed any of the following?

<table>
<thead>
<tr>
<th>Category</th>
<th>Yes, we have carried out a review</th>
<th>No, but we plan to in the next 12–18 months</th>
<th>No, we have NOT carried out a review</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Costed the impact of auto-enrolment on its finances</td>
<td>49</td>
<td>17</td>
<td>19</td>
<td>15</td>
</tr>
<tr>
<td>The way it communicates about pensions to employees</td>
<td>47</td>
<td>19</td>
<td>20</td>
<td>14</td>
</tr>
<tr>
<td>Its HR, payroll and pension admin systems</td>
<td>47</td>
<td>15</td>
<td>22</td>
<td>16</td>
</tr>
<tr>
<td>The governance arrangement for defined contribution scheme</td>
<td>45</td>
<td>15</td>
<td>22</td>
<td>17</td>
</tr>
<tr>
<td>The scheme provider</td>
<td>44</td>
<td>14</td>
<td>24</td>
<td>18</td>
</tr>
<tr>
<td>The defined contribution pension scheme charges</td>
<td>44</td>
<td>15</td>
<td>23</td>
<td>19</td>
</tr>
<tr>
<td>The defined contribution pension default options for scheme members</td>
<td>44</td>
<td>14</td>
<td>24</td>
<td>19</td>
</tr>
<tr>
<td>The way it communicates about other benefits to employees</td>
<td>41</td>
<td>16</td>
<td>25</td>
<td>18</td>
</tr>
<tr>
<td>Your software providers</td>
<td>32</td>
<td>15</td>
<td>32</td>
<td>21</td>
</tr>
</tbody>
</table>

Base: Autumn 2013, all private sector employers (399)
Turning to those firms that had not yet implemented auto-enrolment, 51% and 68% respectively of smaller and larger had identified their staging date.

Figures 2 and 3 show a comparison of how LMO employers who have implemented auto-enrolment have responded to any extra costs and how those who have yet to implement auto-enrolment might respond.

For both those who have implemented auto-enrolment and those who have not the most mentioned response is to simply absorb the costs (19%) or any potential costs (29%). In reality, 20% of those who have implemented auto-enrolment didn’t report any extra costs, a higher proportion than the 12% (of those yet to implement auto-enrolment) who don’t anticipate any extra costs.

Of those LMO employers who have not yet implemented auto-enrolment, there is an assumption that wages will be affected by auto-enrolment implementation, with 26% predicting lower wage growth, 23% that they will reduce other elements of pay and 22% that there will be no wage growth in their organisation when they implement auto-enrolment.

Our survey shows that the most likely source of advice and guidance when preparing for auto-enrolment has been from a pension provider (32%) or from a pension adviser (25%). However, just over a quarter of those LMO employers who have implemented auto-enrolment did not seek any external advice (27%). Looking to the future, if there is a capacity crunch in the pension industry, SMEs may have to rely on other sources of advice, information and guidance, such as the Pensions Regulator or professional bodies.
Figure 3: How do you think your organisation will manage the extra pension costs, if any, auto-enrolment might have on your organisation?

Figure 4: From which of the following, if any, did you seek external advice, information and guidance as you prepared for automatic enrolment?
Implications for SMEs
The experiences of those employers that have auto-enrolled so far may not be representative of what SMEs may face. For instance, prior to automatic enrolment many large employers already had large pension scheme membership, so the extra cost of employer contributions was not significant, and may have been outweighed by administrative costs.

Many SMEs have little history of contributing to their employees’ pensions and so the cost of contributions may be more significant and they may be less able to take a hit through lower profits and more likely to look for savings in other places.

While many large employers have created a separate pension scheme for eligible jobholders, this may not be an option for SMEs, who may want one scheme for all employees for the sake of simplicity. Whether all pension providers will be able to meet that need is another matter, so SMEs should quickly find one that can.

Our survey shows that while the emphasis has been on ensuring that the organisation focuses on automatic enrolment, many large employers have been reviewing both strategic issues (such as aligning the process with the needs of the business, its culture and its approach to talent management) as well as operational issues (such as scheme governance, charges and default funds). However, between 35% and 40% of SMEs report that they have no plans to review such operational issues, while 40–50% have no plans to look at some of the more strategic considerations around automatic enrolment. The concern is that without carrying out these reviews, many SMEs will not benefit from auto-enrolling their staff.

Finally, while many large companies have been able to use their pension providers and advisers as sources of information and guidance, the concern is that SMEs who leave it late in the day to prepare for automatic enrolment will not be able to rely on these sources to the same extent.

Useful links


CIPD event report: Real-time Information in PAYE Reporting: cipd.co.uk/publicpolicy/policy-reports/preparing-for-real-time-information.aspx

CIPD Podcast 83: Pension auto-enrolment: the lessons for SMEs: cipd.co.uk/podcasts/_articles/pension-auto-enrolment-podcast-83.htm

CIPD Labour Market Outlook: Focus on pension auto-enrolment: cipd.co.uk/hr-resources/survey-reports/labour-market-outlook-focus-pension-auto-enrolment.aspx

The Pensions Regulator: www.thepensionsregulator.gov.uk


Chartered Institute of Payroll Professionals: www.cipp.org.uk


NEST: www.nestpensions.org.uk/schemeweb/NestWeb/public/home/contents/homepage.html


Pensions resources, produced in partnership with KPMG: cipd.co.uk/pensions