



Greater Gwent (Torfaen) Pension Fund

Communications Policy Statement

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1. Introduction

Legislative Background

Local Government Pension Scheme (LGPS) administering authorities are required to publish a statement of policy concerning communications with members, and Scheme Employers, under the LGPS Regulations 2013. Torfaen County Borough Council is the LGPS administering authority for the Greater Gwent (Torfaen) Pension Fund.

A communications policy is a written statement setting out the administering authority's policy concerning communications with members (and their representatives), prospective members and Scheme Employers.

The policy must cover:

- a) the provision of information and publicity about the Scheme to members, representatives of members and scheme employers;
- b) the format, frequency and method of distributing such information or publicity and;
- c) the promotion of the Scheme to prospective members and their employers.

Communication is at the heart of everything the Greater Gwent (Torfaen) Pension Fund does and is key to us achieving our administrative objectives.

There is now greater awareness of, and debate about, pensions amongst the general public and this has led to an increase in the level of information which our members and employers expect from the Pension Fund. The Pension Fund therefore needs to be more pro-active in delivering clear and timely communications to members and employers which is relevant to their needs.

The Pension Fund has a dedicated Communications and Training Team to meet the communications challenges. We are committed to maintaining investment in a range of communications media to ensure we reach our audiences in the most appropriate manner and that our message is engaging.

The LGPS is a complex Pension Scheme which is subject to continual change. These changes may be in the form of amendments to the LGPS Regulations or other related legislation, for example changes to tax legislation affecting the Annual Allowance or Lifetime Allowance limits and Freedom and Choice.

The Pension Regulator's **Code of Practice 14 Governance and administration of public service pension schemes** requires the Pension Fund to have particular regard to communications with Scheme Members para 207 states:

“Schemes should design and deliver communications to scheme members in a way that ensures they are able to engage with their pension provision. Information should be clear and simple to understand as well as being accurate and easily accessible. It is important that members are able to understand their pension arrangements and make informed decisions where required”.

To increase audience access to, and understanding of, information about pensions, the Fund has invested in IT solutions including:

- an upgrade to the Pension Fund website
- an Employer Self Service secure online facility
- a Member Self Service secure online facility

These provide an alternative method of communication which helps the Pension Fund to communicate in a timely and cost effective manner.

To better target our communications to Scheme Employers, we have developed and maintain a database of key contacts within each employer organisation, which enables the Pension Fund to direct email communications to the most appropriate people depending on the content.

To help Finance, HR and Payroll staff maintain continuity of knowledge about the LGPS, and understand their role as scheme employers, we aim to communicate opportunities for pensions training on legislative and procedural changes. This includes promoting training courses delivered by the Local Government Association, and also by ourselves.

2. Our Stakeholders and Audiences

We have identified a number of different stakeholder groups, each of which is a separate key target audiences for our communications:

- **Active Members** – who are paying into the Scheme
- **Deferred Members** – pension benefits are ‘on hold’
- **Pensioner Members** – pension benefits are being paid
- **Member Representatives**
- **Prospective Members** – employees who can join the Scheme, but are not currently paying in
- **Scheme Employers**
- **Fund Staff**
- **Other Bodies**

We recognise that each of these stakeholder groups has distinct and diverse communications needs, and we aim to address those separate needs in our Communications Policy.

3. Our policy Aims and Objectives

Communications is key to the Fund achieving its administrative objectives.

Our policy aims are to ensure that the Fund delivers clear and timely pro-active communications to our stakeholders that are:

- **Targeted** - to the different audience groups, in terms of verbal and visual style, content, delivery and media used; while ensuring consistency of message across all media types.
- **Clear and Accessible** in order to be understood by different audience groups. We avoid jargon wherever possible, in order to avoid potential confusion and misunderstanding.
- **Accurate and Timely** so that the messages are received when they are relevant.
- **Provide Equality of access** to address the needs of diverse audiences, in order to reach as many people as possible using a variety of different media appropriate to the needs of each audience group.
- **Understood** – to effectively engage each stakeholder target audience group, and ensure that our communication is understood by them and resonates with them.
- **Requesting Feedback** - this includes questionnaires, and monitoring any compliments and complaints that we may receive.

Our policy objectives are to ensure that our key communication messages are:

- **Received** - that the communications we tailor to each of our various audience groups are effectively delivered to them by the media we have used.
- **Enable stakeholders to make informed decisions about pensions**, so that:
 - a) Members understand the benefits provided by the LGPS and can plan for their retirement and understand the benefits provided for their dependents, and;
 - b) Employers can make effective decisions in the management of risk and engage in the wider pension debate.

4. Communicating with Scheme Employers

Under the LGPS Regulations, the Fund and Scheme Employers have specific roles and responsibilities in administering the LGPS.

In order to deliver a high quality and seamless pension service to our Scheme Members, the Pension Fund and Scheme Employers must work together in partnership. Integral to this partnership working is effective communications which aims to maintain the flow of accurate, timely and clear information between Scheme Employers and the Fund. The goal is to ensure Scheme Member records are accurate and up-to-date, and Scheme Employers have the information and understanding they need in order to make informed decisions and effectively manage risk.

There is a diverse range of Scheme Employers in the Fund, including large Unitary Authorities and education establishments, small Community Councils, charities and service providers. This means that our Scheme Employers have different levels of resources and specialist understanding of pensions matters. We must therefore tailor our communications output to meet the different needs of Scheme Employers of diverse sizes and types, in order to maximise their engagement and understanding.

The Fund aims to develop and maintain effective relationships with each Scheme Employer, in order to facilitate effective partnership working. To this end we engage with key officers face-to-face and via the telephone and email, so that we develop strong personal relationships and trust.

Communication initiatives include:

- Asking each Scheme Employer to appoint a Lead Officer for the LGPS. The Lead Officer is responsible for disseminating information the Fund sends to that Employer to key officers within their organisation and ensuring the flow of timely pension information and member data from the Employer to the Fund.
- Ensuring that Lead Officers received clear and timely communications about the LGPS Regulations and other statutory requirements, and Fund procedures, so that they can ensure their organisation has effective internal procedures in place to meet these requirements and procedures.
- Maintaining a central email contacts list of key Finance, HR and Payroll officers for each Scheme Employer.

The Fund communicates with the Scheme Employers in a number of ways:

- Our website is mainly aimed at scheme members but contains information relating to scheme benefits which is useful for Employers.

The Website also contains all the Pension Fund Governance Documents, for example the Actuarial Valuation Report, Policy Documents and the Annual Report and Accounts. There are also links to sources of further information such as the Local Government Association's (LGA's) dedicated LGPS website.

- The Pension Fund has also set up an Employer Self Service Secure Online facility through which the Employers can submit monthly membership data files and year end files. This enables the employer to check and cleanse the data before submission. The Employer can also submit starter files, leaver forms, change in circumstance forms and estimate request forms electronically through the online system. The Pension Fund can use the online system to send information to employers such as retirement estimates for individual members. The Employer Self Service has greatly improved the quality and timeliness of data submitted to the Pension Fund.

The Pension Fund also sends:

- Periodic 'Communication Update' emails to keep Scheme Employers up-to-date with topical pensions matters, including highlighting information contained in LGA Circulars, and encouraging attendance at employer training courses.
- Periodic electronic Employer Newsletters covering relevant pensions issues, including legislative and procedural changes.

The Pension Fund also meets with employers through:

- Employer meetings as required to discuss topical issues, provide information and discuss improvements in the flow of information.
- Additional Employer meetings as required, for example pre and post actuarial valuation meetings.
- Meetings with individual employers to discuss matters specific to their participation in the Pension Fund or to provide advice and guidance on specific issues.
- Training workshops for the Scheme Employers HR and Payroll officers to help them to carry out their role as a participating employer in the Pension Fund and to understand the application of the Pension Scheme Regulations.

5. Communicating with Scheme Members (and their Representatives)

Scheme Members can often find pensions confusing, especially when they are presented with information full of pension industry jargon. We understand that it is fundamentally important to communicate complex technical matters to Scheme Members using clear key messages, in order to reduce the potential for confusion and consequent misunderstanding.

Our communications material is designed to give Scheme Members sufficient understanding of the benefits provided by the LGPS to enable them to make informed decisions when planning for their retirement, and for their dependants.

Representatives of Scheme Members - we will provide the same information to a representative of a Scheme Member that we provide to a Scheme Member, when authorised to do so by the Scheme Member.

The Pension Fund website

The Pension Fund website is available at www.gwentpensionfund.co.uk and is our main communications resource for generic information about the LGPS. It is designed to meet the needs of different types of Scheme Member.

The Website can be used effectively on different devices including smartphone and tablet devices.

The main LGPS regulatory content is maintained and updated by the website provider. The Pension Fund however maintains and updates the Greater Gwent (Torfaen) Pension Fund specific content on the website including member forms, governance documents and news pages.

6. Communicating with Active Members and Prospective Members

Active Members (including Councillor Members) are those who are paying into the LGPS in a post with a Scheme Employer.

We aim to deliver messages to Active Members that engage them, and that are clear to understand, so that they are aware of the valuable benefits they and their dependants have by being a member of the LGPS. We also aim to deliver messages to Active Members at the right time, so that our messages are relevant and, where deadlines apply, so that members can make decisions about their pension in good time.

We understand that Active Members have different levels of interest in, and understanding of, pension matters. We aim to use a variety of communications media to reach different audience types, and present information in different levels of detail, appropriate to the needs of different Active Member audiences.

All members are encouraged to register for MyPension Online which provides a secure environment through which to provide details to members about their pension benefits. This facility includes an online benefit calculator using the members' actual membership to enable members to assess the level of pension they are likely to receive at their chosen retirement date. This assists with retirement planning. This facility is not available to Councillor Members as their Pension Benefits are calculated on a different basis to main scheme members.

Where members are unable or unwilling to use MyPension Online the Pension Fund will continue to communicate with them by post, telephone and/or email.

The Fund communicates with Active Members in a number of ways:

- **Pension Starter Pack** - issued when a Scheme Employer notifies us of a new Active Member. This includes a Short Guide to the LGPS explaining the benefits of scheme membership and details of sources of further information.
- **Membership Certificate** (Statutory Notification) - issued to a new Active Member, and following a subsequent material change.
- **Internet** - the Fund has a designated area on our website with information tailored to meet the needs of Active Members. This includes information for members under different headings, for example, How a Care Scheme Works, Transitional Protections, Retirement and Divorce. There is a separate section dealing with the pension benefits for Councillor Members.

- **Annual Benefit Statements** - each year we issue a statement to each member showing the pension they have built up to the previous 31st March.
- **Workplace Presentations** - working with Scheme Employers, we will deliver presentations to Active Members on request.
- **Newsletters** - we issue periodic newsletters to Active Members to update them on topical pension's matters and changes.

Communicating with Prospective LGPS Members

- **Short Guide to the LGPS** - Scheme Employers are asked to include a Short Guide to the LGPS in the contract of employment which they send to new employees.
- **Automatic-enrolment** - Scheme Employers should auto-enrol prospective members into the LGPS at the appropriate trigger point.
- **Internet** - the Fund has an area on our website targeting Prospective Members '*Joining*'. This contains information on how to join the LGPS and the costs and benefits to the member.

7. Communicating with Deferred Members

Deferred Members are those who have stopped paying into the LGPS, whose benefits are being held by the Fund as 'Deferred Benefits' (i.e. they have not been put into payment or transferred to another pension scheme).

We communicate with our Deferred Members in a number of ways:

- **Deferred Benefits Statement** - when we award a member Deferred Benefits we send them a statement showing the value of their deferred pension and potential Survivor's pension, and how the benefits have been calculated. We also provide information on how the value of the deferred benefit will increase and when it can be paid including being paid early on the grounds of permanent ill health.
- **Annual Benefit Statement** - each year we issue a statement to each Deferred Member showing the current value of their Deferred Benefits, with information on when they can be paid.
- **Periodic Newsletters** - we will issue Deferred Members with newsletters, whenever relevant.
- **Internet** - the Fund has a designated section on our website with information tailored to meet the needs of Deferred Members. This includes details of how Deferred Benefits are calculated, protection for members and their family and when benefits become payable, including how they can be paid early on grounds of permanent ill health.

8. Communicating with Pensioner Members

Pensioner Members are those who are receiving payment of their LGPS benefits from the Fund.

Pensioner Members are a very diverse stakeholder audience group, in terms of age and communications needs. LGPS members can often choose to take payment of their LGPS benefits anytime between the ages of 55 and 75, and average life expectancy means that the age profile of the pensioner members exceeds 100 years of age. Pensioner Members also include those receiving Survivor's pensions payable to: spouses, civil partners, eligible cohabiting partners and also any eligible dependent children.

We communicate with Pensioner Members in a number of ways:

- **Pay advice slips** - we send each Pensioner Member a pay slip to their home address in March, April and May to show the annual cost-of-living increase; and also send a payslip if their monthly pension changes by more than £5.
- **P60s** - we send each Pensioner Member a P60 to their home address each year.
- **Life Certificates** - The Pension Fund uses the service of Western Union to verify that overseas Pensioner Members are still alive.
- **Internet** - the Fund has a designated area on our website with information tailored to meet the needs of Pensioner Members.
- **'Gwent Grapevine' Newsletter** - we send a newsletter to Pensioner Member home addresses, or registered personal email addresses, at least once a year. This includes a Pay Dates Calendar.
- Pensioners who register for **My Pension Online** will be able to access their pension payslip every month, as well as their P60 and Newsletters.

9. Communicating with Fund Staff

We recognise that our staff are our greatest resource and our Communications Policy aims to ensure that they are best placed to deliver a quality and accurate service, in terms of the message delivered to stakeholder audiences.

The Fund communicates with staff in a number of ways:

- **Fund Staff Meetings** - held monthly to provide an update to Fund staff on strategic and operational matters, including any changes to working procedures. Staff are encouraged to actively engage in these meetings to identify any issues and suggest potential service improvements.
- **Fortnightly Meetings** - between senior staff to co-ordinate workloads and to discuss issues which have arisen.
- **'Pensions Mentions' Update Newsletter** - circulated to staff periodically, to highlight topical pension matters including regulatory and procedural changes.
- **Staff Feedback on Communications** - Staff are encouraged to report back on any feedback given to them by stakeholders, and this is used in the ongoing development and improvement of our communications output.
- **Annual Appraisal** - Fund staff of all levels have a 'Work smart Review' each year to discuss work issues and areas for development.
- **Training** - training needs are identified and addressed as part of staff Work smart Review. As part of the Fund's commitment to delivering a professional pensions service to stakeholders, Fund staff are encouraged to study for professional qualifications in pension administration. Staff also attend LGA training as appropriate and receive in-house training in relation to changes in Regulations, procedures and working practices.
- **IT** - All staff have access to the Pension Fund Website, the Employer and Member Self Service and the Internet to assist them in carrying out their roles.

10. Communicating with the Pensions Committee and Local Pension Board

Torfaen County Borough Council, administering authority for The Greater Gwent (Torfaen) Pension Fund, has established a Pensions Committee which meets quarterly to discharge the duties of the Council regarding the governance and administration of the Fund. The Pensions Committee is made up of six elected Councillors.

The Administering Authority has also established a Local Pension Board in accordance with the requirements of the Public Service Pension Scheme Act 2013. The role of the Pension Board is to assist the Administering Authority in its role as the Scheme Manager. The Pension Board has five scheme member representatives, five employer representatives and an independent chair. The Pension Board meets four times a year.

The Pensions Committee is responsible for approving the pension fund governance documents, including the Annual Report and Accounts and the Pension Fund Policies. It is also responsible for setting the Pension Fund Investment Strategy and the appointment of Investment Managers.

To facilitate the work of the Pensions Committee they are provided with access to all the Pension Fund Documents and are required to approve all amendments to policy. The Scheme documents include:

- **Annual Report and Accounts** - this is the Fund's primary publication on investment and administration.
- **Reports** - Fund officers draft reports on investment, actuarial, administration and other matters for consideration by the Committee.
- **Presentations** - Fund officers and advisers deliver presentations on investment, actuarial, and administration matters to the Committee.
- **Ad-hoc Consultations** - Fund officers will consult with the Chair of the Committee on matters arising during the year.
- **Training** - Committee members and Pension Board Members are required to undertake relevant training to enable them to carry out their respective roles. Training includes attendance at the LGA Fundamentals training course, attendance at conferences such as the annual trustee conference, in-house training provided by Fund Officers, the Pension Fund Investment Managers and advisors and the Pension Fund Actuary. Pension Board Members are also able to attend Pension Board specific training and conferences. Training is a standing agenda item for both the Pension Committee and the Pension Board meetings.

- **Pension Committee and Pension Board Papers** - these are published on the Torfaen Council website.

The role of the Local Pension Board is to oversee the work of the Pensions Committee and to assist the Pension Fund in complying with all the legislative requirements making sure the scheme is being effectively and efficiently governed and managed.

To facilitate the work of the Pension Board they are provided with access to all the Pension Fund Documents including the Annual Report and Accounts, the Actuarial Report, the Pension Fund Policy Documents, Pensions Committee reports and decisions. Fund officers will also have discussions with the Independent Chair of the Local Pension Board on matters arising during the year.

11. Communicating with Other Bodies

The Fund engages proactively with a number of local and national groups concerned with the administration of the LGPS. This is so that the Fund is able to engage in the wider pensions agenda and share best practice with industry leaders.

The Fund has representation on, or attends:

- LGPS Advisory Board
- The Local Government Association's Communications Working Group
- All Wales LGPS Fund's Communications Group
- All Wales LGPS Fund's Pension Officers Group
- All Wales LGPS investment pooling groups (via The Wales Pension Partnership)
- National LGPS conference, hosted annually by South West Councils
- Class Axis User Group and AGM
- CIPFA

The Fund also communicates with other bodies and aims to respond to any consultations and surveys that they might conduct on the LGPS and proposed legislative changes including:

- Auditors
- Secretary of State for Communities and Local Government
- Welsh Government
- LGPS Advisory Board
- Local Government Association

12. Data Protection and Freedom of Information

Data Protection - The Greater Gwent (Torfaen) Pension Fund is registered under the Data Protection Act 1998 as part of Torfaen County Borough Council.

Disclosure - the Fund may pass certain information to a third party if the third party is carrying out an administrative function of the Fund, for example the Fund's Actuary or AVC provider.

National Fraud Initiative - The Greater Gwent (Torfaen) Pension Fund has a duty to protect the public funds we administer. This includes our participation in the Government's National Fraud Initiative, and we may share information with other bodies responsible for auditing or administering public funds for the purpose of preventing and detecting fraud.

Freedom of Information - Nothing in this Communications Policy affects a Scheme Member's rights to access or receive information under the Freedom of Information Act. You can apply for information held by the Fund that is not already made available by writing to Torfaen Council's Freedom of Information Officer. A charge may be made for this information.

13. Contacting the Greater Gwent (Torfaen) Pension Fund

You can contact us in a number of ways:

In person or by post
at our offices:

Our office address is:

The Greater Gwent (Torfaen) Pension Fund
Torfaen County Borough Council
Civic Centre, Pontypool Torfaen
NP4 6YB

By email:

pensions@torfaen.gov.uk

By telephone:

01495 766266

Electronically via My Pension Online if you are a member, or Employer Self Service if you are an employer. These online facilities and information about the LGPS can be found on the Pension Fund's website:

www.gwentpensionfund.co.uk