Communication Policy Statement

Introduction

This is the Communication Policy Statement of the following Schemes as administered by West Sussex County Council.

- Local Government Pension Scheme (LGPS)
- Firefighters Pension Scheme(s)
- National Health Service Pension Scheme
- Teachers’ Pension Scheme

West Sussex County Council has outsourced the Pensions Administration to Capita.

The delivery of the benefits involves communication with a number of other interested parties. For the LGPS, the County Council liaises with over 212 employers and approximately 72,600 scheme members.

This statement provides an overview of how the Pension Fund will communicate and reflects the corporate customer promise of West Sussex County Council (as Administering Authority).

This document should be read in conjunction with the Administration Strategy which sets out the expected timescales for meeting various information requirements.

Any enquiries in relation to this Communications Policy Statement should be forwarded to Tara Atkins, Principal Pensions Consultant (Administration and Employers) (0330 222 8787 or tara.atkins@westsussex.gov.uk)

Regulatory Framework

1. Every Local Government Pension Scheme (LGPS) administering authority must prepare, publish and maintain a new policy statement on communication strategy. The details of this requirement are contained in Regulation 61 of the Local Government Pension Scheme Regulations 2013.

2. However this statement sets out the County Council’s policy concerning how it will communicate with members and the format, frequency and method for communicating for all of the Schemes administered by West Sussex County Council:
3. As a provider of an occupational pension scheme, the Council is already obliged to satisfy the requirements of the Occupational Pension Schemes (Disclosure of Information) Regulations and other legislation, for example the Public Sector Pensions Act 2013. Previously the disclosure requirements have been prescriptive, concentrating on timescales rather than quality. From April 2006 more generalised disclosure requirements were introduced, supported by a Code of Practice. The type of information that pension schemes are required to disclose will remain very much the same as before, although the prescriptive timescales are being replaced with a more generic requirement to provide information within a “reasonable period”. The draft Code of Practice issued by the Pensions Regulator in September 2005 sets out suggested timescales in which the information should be provided. \(^1\) While the Code itself is not a statement of the law, and no penalties can be levied for failure to comply with it, the Courts or a tribunal must take account of it when determining if any legal requirements have not been met.

**Responsibilities and Resources**

4. The responsibility for communication material for each Scheme rests with the County Council in partnership with Capita.

5. In most cases, other than for NHS and Teachers, as this is done nationally, Capita will write, design and produce most of the communications including any web based or electronic material. Capita will distribute any communication literature as appropriate for the NHS and Teachers schemes.

6. The County Council is committed to using technology to enhance services, improve accessibility and broaden inclusion. The County Council will work in partnership with Capita to develop further our use of electronic means of communicating through e-mail and our internet site (including Hartlink Online). Wherever possible, responses will be sent by electronic means.

7. An exercise was undertaken to notify all members that it would be their responsibility to keep up to date of any changes via the Pension Fund website or via electronic communication (i.e. email), unless a member elected to opt out of this process.

8. Scheme member’s e-mails were captured as part of this exercise in order to facilitate electronic communications. It is important therefore that scheme members keep Capita Pensions updated with any changes to their e-mail address or home address (where a member has opted out of the process).

9. Key website shortcuts have been shown in the relevant sections of this document.

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1 Code of Practice – Reasonable periods for the purposes of the Occupational Pension Schemes (Disclosure of Information) Regulations 2006 issued September 2005
Branding

10. As the Pension Fund is administered by Capita in partnership with the County Council, all literature and communications will conform to the Corporate Identity Standards of the Council. Capita specific communications will include Capita standard branding.

11. Additionally, some communications will also contain the standard branding for the relevant Scheme.
Accessibility

12. The Council recognises that individuals may have specific needs in relation to the format of our information or the language in which it is provided. Demand for alternative formats or languages are not high enough to justify the preparation of the alternatives automatically. However alternative material will be provided on request.

Communication with Stakeholders

13. The Schemes have a number of interested parties (stakeholders) who the County Council is committed to communicating with in a clear and efficient manner. Key priorities for 2018/19 have been set out below:

- Work with the County Council’s Online Service Delivery team to review the content and presentation of the West Sussex County Council website to create a more user-friendly, streamlined and modernised solution which helps members to become self-sufficient

- Work with the wider Capita network (Engagement, Communications, IT) to review the existing Hartlink Online Portal to continually improve member engagement and to drive traffic to the online solution

- Continually review the Annual Benefit Statement for active members so that it engages members in planning for their retirement

- Continually review the online Retirement Illustrator in order to allow members to accurately and efficiently illustrate their own retirement benefits and to drive self-service

- Innovate the Annual Pensions Newsletter for employers and members in look, feel, format, content and purpose to build relationships with the audience and provide fit for purpose information.

14. Details of the objectives of the communication strategy with the various stakeholder groups and details of how this is achieved have been set out in the following sections.

15. For the LGPS the following documents are considered to be relevant to all stakeholders:

- **Annual Report & Accounts** which sets out details of the value of the Pension Fund during the financial year, income and expenditure and how the fund is managed.

- **Investment Strategy Statement** Which outlines how investment decisions are made, the types of investment held, fees paid, risk and corporate governance.
• **Business Plan** which deals with the functions carried out by the Pension Fund as administering authority on the investment side
• **Governance Policy and Governance Compliance Statement** which provides details pension fund governance arrangements, such as the remit of the Investment Panel and representation
• **Funding Strategy Statement** which sets out how employer liabilities will be calculated and the strategy for covering future service accrual, and past service deficits.
• Details of the **Pensions Panel** including meeting dates, membership details and meeting papers.
• Publishing **voting activity** over the recent periods.

These documents are all available on [https://www.westsussex.gov.uk/about-the-council/pensions/local-government-pension-scheme-lgps/other-information/pension-fund/](https://www.westsussex.gov.uk/about-the-council/pensions/local-government-pension-scheme-lgps/other-information/pension-fund/)

16. In addition there are a number of other stakeholders with whom the Pension Fund communicate on a regular basis, such as Her Majesty’s Revenue and Customs, the Department for Communities and Local Government, solicitors, the Pensions Advisory Service, and other pension providers.
Active, deferred and pensioner members and prospective members

17. Objective:

- For the Schemes to be used as a tool in the attraction and retention of employees;
- To improve the understanding of how the Schemes works;
- To inform scheme members of their pension rights and benefits. To ensure members are aware of the full benefits of scheme membership, and the contributions that employers make;
- As a result of improved communication, for queries and complaints to be reduced;
- To improve take up of the Scheme;
- To comply with out statutory obligations

18. We do this by:

- Maintaining webpages which provide detailed information about the Schemes, including who can join, how much it costs, the retirement and death benefits and how to increase the value of benefits. The Hartlink Online Portal, which is a secure site that members can register on, also provides access to an online illustrator for members to be able to calculate their projected benefits.

Please see:

https://www.westsussex.gov.uk/about-the-council/pensions/firefighters-pension-schemes/
https://www.westsussex.gov.uk/about-the-council/pensions/teachers-pension-scheme/
https://www.westsussex.gov.uk/about-the-council/pensions/nhs-pension-scheme/

- Publishing information about the benefits of the Schemes on the relevant websites

- Producing an annual newsletter (for current members and pensioners) which provides updates in relation to changes to the Schemes as well as other related news, such as national changes to pensions, forthcoming seminars, a summary of the accounts for the year, contact details, etc. These are published on the relevant Scheme websites (see above).

- Providing annual benefit statements for active members which includes details about the current value of benefits, details of transferred services, the associated death benefits and details of any individuals the member has nominated to receive the lump sum
death grant. Annual Benefit Statements will be made available as set out below:

<table>
<thead>
<tr>
<th>Scheme</th>
<th>Publication Date</th>
<th>Publication Format</th>
<th>Alternative formats</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Government Pension Scheme (LGPS)</td>
<td>31 August each year</td>
<td>Online Portal (link)</td>
<td>Paper copies available on request to Capita.</td>
</tr>
<tr>
<td>Firefighters Pension Scheme(s)</td>
<td>31 August each year</td>
<td>Online Portal (link)</td>
<td>Paper copies available on request to Capita.</td>
</tr>
<tr>
<td>National Health Service Pension Scheme</td>
<td>31 August each year</td>
<td>Online Portal (link)</td>
<td>N/A</td>
</tr>
<tr>
<td>Teachers’ Pension Scheme</td>
<td>31 August each year</td>
<td>Online Portal (link)</td>
<td>N/A</td>
</tr>
</tbody>
</table>

- Providing **annual benefit statements for deferred members** which includes the current value of the deferred benefits and the earliest payment date of the benefits. Annual Benefit Statements will be made available through the Hartlink Online Portal, which is a secure site that members can register on. If members choose not to sign up to the Online Portal, they will need to make a formal request to Capita Pensions to receive their Annual Benefit Statement by post.

- Providing **calculations of pension benefits, transfers, deferred benefits, pension shares, increasing pension benefits, and other processes** as requested, in the format requested by the member.

- Provide **latest news updates** which provide information on specific topics, such as changes to the regulations, topping up pension rights, and transfer values in and out of the scheme on the relevant websites.

- Advertising the **Pre-Retirement course** which is currently available on the Learning and Development Gateway.

- Providing **training, workshops and surgeries for groups of members** to improve understanding of the principles of the Scheme, changes, options and associated benefits in the Schemes as required and requested. These face-to-face sessions will allow the Pensions Team to gain the trust of members and increase credibility.

- **Responding to all letters, e-mails, enquiries and phone calls** appropriately and within reasonable timescales, in the format requested by the requestor. Where possible we will aim to increase our verbal communication with members to resolve their enquiry with a view to improve their customer journey.
• Requesting annually feedback via a **Customer Satisfaction survey**.

**Members of the Pension Advisory Board (LGPS and Firefighters Scheme(s) only)**

19. **Objective:**
   
   • To ensure they are aware of their responsibilities in relation to the Scheme;
   • To ensure they are aware of their responsibilities in relation to the Scheme Manager, the Pensions Regulator and the National Scheme Advisory Board;
   • To ensure that the required level of knowledge and understanding is maintained.

20. **We will do this by:**
   
   • **Responding to all requests** for information by the Board secretariat.
   
   • **Drafting an administration procedures and performance report** to keep the Board updated of caseload performance, membership movements, projects, notifiable events and contribution monitoring.
   
   • **Drafting papers** as requested by the Board secretariat.
   
   • **Attending meetings** as required.
21. Objective:

- To assist them in understanding costs/funding issues;
- To work together to maintain accurate data;
- To ensure their members are provided with all the necessary information;
- To ensure they are fully aware of developments within the Schemes;
- To ensure they are aware of the policies in relation to any decisions that need to be taken concerning the Scheme and to assist them in making the most of the discretionary areas within the Schemes.

22. We do this by:


- Providing employer workshop style sessions set up as and when required to debate current issues and regulations changes within the LGPS as required and requested.

- Providing calculations and costings of early retirement scenarios as requested, in the format requested by the employer.

- Provide latest news updates including a summary of the Bulletins which are issued by the Local Government Pensions Committee (LGPS) covering information on specific topics, such as changes to the regulations, updates from HMRC/DWP, news from the LGPS community.

- Holding an Annual General Meeting each July to discuss the Pension Fund’s Annual Report and any other pertinent issues.

- Providing training for small groups to improve understanding of pension administration, legislation, the principles of the Scheme, changes and costs e.g. as a result of restructuring.

- Holding meetings on key issues at least twice a year as necessary with all scheme employers.

- Holding Actuarial Valuation meetings with the Fund Actuary leading up to and during an Actuarial Valuation year to discuss the results and implications of the Actuarial Valuation and other actuarial matters.

- Providing training on provision of end of year member data, including the completion of the appropriate data capture spreadsheet.
- Publication of an **employer newsletter** every six months on the relevant websites and via email, and a monthly employer bulletin covering a summary of LGPS news.

- Requesting feedback via a **Customer Satisfaction survey** via requests within the Employer Newsletters.
Pensions Panel (LGPS only)

23. Objective:

- To ensure members are aware of their responsibilities in relation to the Scheme;
- To seek members approval to the development or amendment of discretionary policies, where required;
- To assist members in making decisions about investment, administration and governance of the Scheme;
- To seek members approval to formal responses to government consultation in relation to the scheme.

24. We will do this by:

- Drafting, reviewing and publishing **key Scheme documents**, 
- Publishing **formal papers** setting out relevant issues in respect of the Scheme, in many cases seeking specific decisions or directions. All Pension Panel details can be found here:

  https://www.westsussex.gov.uk/about-the-council/how-the-council-works/committees-and-decision-making/statutory-committees/pensions-panel/

- A **formal meeting** of Pension Panel members attended by senior managers, at which local decisions in relation to the scheme are taken
Capita and WSCC Pensions Staff

25. Objective:
   - To provide in depth and practical training to new employees
   - Provide training updates to existing employees
   - Provide working manuals to all employees
   - Document any procedural changes
   - Monitor/ review service standard to strive for continual improvement
   - Be aware of changes and proposed changes to the scheme;
   - To provide on the job training on specific Scheme issues such as admission arrangements;
   - In partnership with Capita to develop improvements to services, and changes to processes as required;
   - To agree service standards.

26. We will do this by:
   - Monthly **Service Review meetings**.
   - Fortnightly catch up meetings between the Principal Pensions Consultant (Administration and Employers) and the Pensions Operations Manager.
   - **Regular catch up meetings** between West Sussex County Council legal services, corporate finance team, and Capita.
Media and Other Stakeholders

27. Objective:

- To ensure the accurate reporting of Fund valuation results, the overall performance of the Fund and the Fund’s policy decisions against discretionary elements of the scheme;
- To ensure accurate reporting on any issues relating to the Schemes.
- To meet our obligations under various legislative requirements, specifically the requirements of the Pensions Regulator (tPR);
- To ensure the proper administration of the scheme;
- To deal with the resolution of pension disputes;
- To administer the Schemes AVC arrangements (LGPS only),

28. We will do this by:

- **Responding to consultations** about regulatory changes and the future of the Scheme.

- **Publishing notices** such as via the Members Information Services or OJEU following specific Investment Panel decisions such as conclusion of a procurement exercise and to advise on votes cast by the investment managers on behalf of the pension fund, specifically relating to remuneration.

- **Publishing press releases** providing statements setting out the County Council’s opinion on Scheme matters concerned, e.g. Fund valuation results.

- **Responding to Freedom of Information** and other requests.

Reviewed July 2018