

East Sussex Pension Fund

Communications Strategy

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Introduction

This is the statement outlining the Pension Communication Strategy for the East Sussex Pension Fund (the Fund) as per Regulation 61 of the Local Government Pension Scheme (LGPS) Regulations 2013. In consultation with the Pension Board employers in the Fund, scheme member representatives and other interested stakeholders this strategy will be reviewed annually and updated as necessary following each review.

The aim of this Communication Strategy is to ensure that scheme members appreciate the benefits of the scheme and all stakeholders are kept informed of developments within the Fund, and effective communications will also help to maintain the efficient running of the Scheme.

East Sussex County Council (the administering authority) is responsible for the local administration of the Fund, which is part of the LGPS. The East Sussex Pension Fund liaises with over 130 scheme employers to provide pensions to over 70,000 members.

The East Sussex Pension Fund recognises that there are several distinct Stakeholders groups each with slightly different needs, including:

- Scheme members (active, deferred, pensioner and dependant members) and their representatives
- Prospective members and opt outs
- Scheme employers and prospective Scheme employers
- Pension Committee and Pension Board members
- Pension Fund Staff (including Orbis)
- Pension Fund advisors
- Other interested organisations including HM Revenue & Customs (HMRC), the Ministry for Housing, Communities and Local Government (MHCLG) and other relevant Government Departments and the Scheme Advisory Board (SAB)
- Council Tax payers.

The main means of communication with these key stakeholders are outlined in this statement, which includes making the best use of technology where appropriate, and noting a disparate and potentially vulnerable membership, to provide quicker and more efficient communications for the Fund's stakeholders.

Regulatory Basis

The LGPS is a statutory scheme, established by an Act of Parliament. Regulation 61 of the Local Government Pension Scheme Regulations 2013, reproduced below, provides the conditions and regulatory guidance surrounding the production and implementation of Communications Strategies:

Statements of policy concerning communications with members and Scheme employers

61. (1) An administering authority must prepare, maintain and publish a written statement setting out its policy concerning communications with —

(a) members;

- (b) representatives of members;
- (c) prospective members; and
- (d) Scheme employers.

- (2) In particular the statement must set out its policy on —
- (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.

(3) The statement must be revised and published by the administering authority following a material change in their policy on any of the matters referred to in paragraph (2).

This strategy has been developed to include the information required by those provisions and to describe the Fund’s approach in relation to meeting these requirements in the delivery of communications. Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 and other legislation includes various requirements relating to the provision of information relating to pensions (in addition to the requirements in the LGPS Regulations). The Fund aims to adhere with all such legislation and related statutory or best practice guidance. This includes the Pension Regulator's Code of Practice.

There are other regulatory requirements that the Fund adheres to, including the General Data Protection Regulations and the Freedom of Information Act.

Our Aims and Objectives

To ensure that we are communicating effectively with our audiences and that we continue to enhance the service we offer, we have set the following objectives:

- To help members understand the valuable benefits on offer through membership of the scheme as part of their employer’s remuneration and reward package
- Provide sufficient information so members can make informed decisions about their benefits
- Communicate in plain English and a clear, concise manner which is easy to access
- Ensure the most appropriate means of communication is used, taking into account the different needs of different stakeholders, including providing more accessibility through greater use of technology where appropriate as it may not be appropriate for some groups of members
- Regularly evaluate the effectiveness of communications with members and employers and shape future communications appropriately

Measuring whether we meet our Communication Objectives

The Fund will monitor success against our communication objectives as shown below:

Objectives	Measurement
To help members understand the	- Member satisfaction levels

<p>valuable benefits on offer through membership of the scheme as part of their employer's remuneration and reward package</p>	<p>achieved in biennial surveys of members</p> <ul style="list-style-type: none"> - Responses to any specific questions in biennial survey issued to members in this area - Feedback from the Pension Board and Orbis Helpdesk to the Pension Board on a quarterly basis to evaluate service provided
<p>Provide sufficient information so members can make informed decisions about their benefits</p>	<ul style="list-style-type: none"> - Evaluate surveys and feedback to the committee on interventions needed
<p>Communicate in plain English and a clear, concise manner which are easy to access</p>	<ul style="list-style-type: none"> - Employer and member satisfaction levels achieved in biennial surveys of both groups - Responses to any specific questions in biennial survey issued to scheme employers and scheme members in this area, where appropriate
<p>Ensure the most appropriate means of communication is used, taking into account the different needs of different stakeholders, including providing more accessibility through greater use of technology where appropriate as it may not be appropriate for some groups of members</p>	<ul style="list-style-type: none"> - Increasing use of digital services for both scheme members and scheme employers - Responses to any specific questions in biennial survey issued to scheme employers and scheme members in this area
<p>The Pension Board will regularly evaluate the effectiveness of communications with members and employers and shape future communications appropriately.</p>	<ul style="list-style-type: none"> - Undertaking a satisfaction survey annually - Results from satisfaction survey are thoroughly analysed and investigated, and trends monitored from previous years. - Detailed analysis of survey results is used to identify areas to improve communications in future. - Compliments and complaints are recorded and trends analysed - Pension Board to annually evaluate the effectiveness of communications

An overview of our performance against these objectives will be reported within the Fund's annual report and accounts and also reported on a quarterly basis to the Pension Board and Pension Committee.

If performance is substantially below standard (whether by a large margin for a short period of time or a small margin for a longer period of time) the Fund will formulate an improvement plan. This will be reported to the Pension Committee and Pension Board together with an ongoing update on achievement against the improvement plan.

Delivery of Communications

East Sussex County Council has delegated responsibility for the management of the Fund to the East Sussex Pension Committee, taking into consideration advice from the Pension Board. The Committee will monitor the implementation of this Strategy on a regular basis as outlined later in this statement.

The day to day delivery of member communication and associated administration related communications, employer data and data and information governance is undertaken by the Fund's shared service administrator, Orbis led by their Head of Business Operations. For scheme employer and other stakeholder related communications the Fund are directly responsible for this delivery led by the Head of Pension Fund.

The Fund has at its disposal a wide range of options for communicating with the diverse groups that it needs to serve. The method of communication will vary depending on what needs to be communicated and to whom. The methods used by the Fund to communicate with all interested parties are detailed below.

General Communication

When considering how to communicate with our stakeholders the intended audience is taken into account to ensure that messages are delivered in a useful and easy to follow manner. Communication is tailored to the recipient's needs, making sure that messages are clear, consistent and use plain English. Communications are delivered using the most appropriate method and there will be continued development of digital platforms to encourage greater accessibility to the Fund's services for all stakeholders.

Every communication has a clear purpose and fits into the overall communications plan, to ensure that they are cost effective. The Fund actively seeks feedback from each of its audiences to continually review, enhance and improve communication methods.

The Fund also adheres to other legislative requirements, including the General Data Protection Regulations, Freedom of Information Act, and pension disclosure legislation. The Fund also aims to adhere to good practice standards such as the National Website Standards.

Branding

As the Fund's administration is undertaken by Orbis, all literature and communications will include a combination of the branding of the East Sussex Pension Fund and Orbis.

Accessibility

The Fund is committed to ensuring that all stakeholders are able to access services equally and recognises that some individuals may require information to be provided in specific formats. While demand for alternative formats remains low at present, the Fund is able to issue documents in braille, large print or audio format on request.

Communication with Scheme Members

The Fund uses a variety of methods to communicate with active, deferred, pensioner and dependant members, and differentiates between them when delivering key messages to each specific audience groups. Scheme members can nominate representatives that the Fund will communicate with on their behalf, subject to the provision of an appropriate letter of authority signed by the scheme member. The Pension Board will be asked to comment on any new communication measures being considered and their views taken into consideration before this strategy is updated.

The core communication objective is that all active members are kept up to date with any changes in scheme benefits, can access scheme advice and have an awareness of the overall performance of the Investment Fund.

This is achieved by the following:

- Dedicated webpage on the County Council's and East Sussex Pension Fund website - the website <https://www.eastsussexpensionfund.org/> includes extensive information and guides about the LGPS, and also contains factsheets, forms and up to date news about the Fund's activities and achievements.
- Orbis will issue electronic or paper-based newsletters as required. For other employer bodies, this is dispatched to a lead contact (usually within the HR and Payroll function) with a request that it is shared with all relevant staff - the contents cover current pension topics within the LGPS and wider pensions industry, along with important repeated messages. Additional newsletters may be issued to update members on important matters as they occur.
- Annual benefit statement - Personalised statements are provided to active and deferred scheme members every year. The statements are available online or posted to members who do not use the online facility (where addresses are known). Orbis will provide an annual update to the Pension Board to evidence that this is happening in practice.
- Notification of a dedicated telephone helpline provided for scheme members and maintained by Orbis.
- Maintenance and availability of Scheme Literature - A range of literature is produced by the Fund and is supplied to both employing bodies and to scheme members directly. Copies of all scheme literature are available on the East Sussex County Council website.
- Provision of member information on pension benefits accrued and leaving benefits are available on request.

Communication with Scheme Members and Prospective Members

The Fund works with scheme employers to promote the LGPS and reduce the number of members opting out of the scheme, particularly after automatic enrolment.

The core communication objective is to ensure that all employee joiners, to all scheme employers in the East Sussex Pension Fund, are made aware of the benefits of becoming a member of the LGPS – and are assisted in the subsequent joining arrangements.

This is achieved by the following:

- Prospective members are provided with joining information on the LGPS. The Fund's website (<https://www.eastsussexpensionfund.org/>) has a section aimed at potential new joiners setting out the main benefits provided by the LGPS
- Access to Orbis Helpdesk.

Communication with all Scheme Employers

To assist scheme employers participating in the LGPS, the Fund has a range of communication materials and methods that aims to increase their understanding of pension issues and help them fulfil their responsibilities as scheme employers.

The core policy communication objective is to ensure that all scheme employers are aware of:

- the Fund's Pensions Administration Strategy and Service Level Agreements, the Funding Strategy Statement and Investment Strategy Statement including the performance of the Fund's Investment's (given its impact on employer contribution rates).
- any scheme changes impacting on the employer's HR or workforce planning.
- any key discretions to be exercised by the individual employer;
- advice on the future valuation outlook; and
- advice and agreement on key frequent and annual data and financial transaction flows between the Fund and individual employers.

All this is in addition to the general pensions awareness scheme employers will wish to maintain as a 'good employer'.

This is achieved by the following:

- The Fund's Pensions Administration Strategy provides an overview of how the Fund and scheme employers will work together to achieve a high-quality service. It sets out, in detail, the obligations and responsibilities of both the

Fund and the scheme employer to achieve set performance standards. This is available on the Fund's website.

- Service Level Agreements (SLAs) ensure best practice and also compliance with audit requirements. The SLA sets out, in detail, the obligations and responsibilities of the scheme employer, the administering authority and the administrator, concerning all aspects of LGPS administration. These Agreements are reviewed and updated annually taking into account changes made to the regulations and feedback from the Fund's scheme employers. All the Fund's scheme employers are consulted on the administrative strategy annually to ensure they acknowledge their responsibilities.
- The Fund will request each scheme employer designate a named individual for Employer engagement with the appropriate delegations and who is the payroll contact for the employer. The scheme employer must keep the Fund aware of any changes pertaining to the contact details for that person.
- Specific communications on scheme changes for scheme employers as and when required.
- Annual employer forum meeting to which all scheme employers are invited dealing with administrative activity investment performance, actuarial insights and any scheme changes and current issues impacting the Fund and the LGPS.
- The HR employer guide, both paper based and maintained on the websites.
- Offer employer training on End of Year returns and the responsibilities of a new employer to the Fund and support in preparing policies such as the Discretionary Policy.

Communication with the Pension Committee and the Pension Board

The governance arrangements of the Fund centre on two bodies, the Pension Committee and the Pension Board.

The Fund works closely with the Pension Committee and the Pension Board, and the core communication objective is to ensure that all scheme members are fully informed on pensions matters including investment, funding, audit, governance, administration and risk. They have regular training to ensure they have sufficient knowledge to fulfil their duties and responsibilities.

This is achieved by the following:

- Providing relevant information on current issues at Pension Committee and Pension Board meetings and the majority of reports to the Pension Committee can be found on the Council's website -

<https://democracy.eastsussex.gov.uk/ieListMeetings.aspx?CommitteeId=373>.

The Pension Board papers can be found on the Council's website –

Communication between the Pension Board, Scheme Members and Scheme Employers

The Pension Board was established in April 2015 to assist the Committee in securing compliance with the scheme regulations and the effective and efficient governance and administration of the LGPS. The board is made up of three employer representative and three employee representatives and an independent chair. Minutes of board meetings are shared on the website.

Fund officers provide professional support to the Pension Board, ensuring regular communication with members and scheme employers through:

- Opportunity for members of the public to attend the Board meeting and receive papers, which will be made public in accordance with the Access to Information Rules in East Sussex County Council's Constitution.
- Up to date information is posted on the Fund website with full terms of reference and policies on the Pension Board and how it operates.

Communication with other Key Stakeholders

There are a number of other interested parties with whom we communicate as required, including:

- Ministry of Housing, Communities and Local Government (MHCLG) - The Fund has regular contact with MHCLG as a responsible LGPS Fund, participating and responding to consultations, as required.
- Scheme Advisory Board - The national SAB was established following the Public Services Pensions Act 2013. It provides advice to the Fund and Local Pension Boards in relation to the effective and efficient administration and management of the Scheme and their funds. The Fund therefore liaises with the SAB as appropriate.
- Local Government Association - The LGA liaises with LGPS Funds and MHCLG to ensure that all LGPS regulations are administered correctly as per MHCLG's instructions.
- The Pensions Regulator - The Pensions Regulator's remit has been extended to the Public Sector as a result of the Public Services Pensions Act 2013. The Fund liaises with the Regulator as required to ensure that it is compliant with the Pensions Regulator's Code of Practice.
- AVC Provider(s) - Additional Voluntary Contributions (AVC) are held and invested separately from the LGPS. The Fund's current AVC providers are Prudential Limited.
- Fund Investment Managers, Advisers and Actuary - The Fund officers have regular meetings with
 - the Fund Managers who invest funds on behalf of the Fund
 - Investment Advisors who provide help and advice on the asset allocation and investments of the Fund
 - The Fund Actuary to discuss funding levels, employer contributions and valuation of the assets and liabilities of the Fund.

The Fund Actuary, Independent Adviser and Investment Adviser attend all Pension Committee meetings.

- ACCESS Pool - The Fund is a member of the ACCESS pool established by a group of 11 Funds to invest assets on a pooled basis for the LGPS Funds administered by those Councils. It is important that ACCESS understands the Fund's strategies so that the assets are invested in accordance with those strategies. Communication with ACCESS will be in a number of ways including directly at officer level and Joint Committee. The East Sussex Pension Committee will also receive regular updates on the activities of ACCESS and will also be responsible for deciding the assets to be invested in ACCESS.

Key Risks

The key (potential) risks to the delivery of this Strategy are outlined below. The Head of Pensions along with other officers will work with the Pension Committee and Pension Board in monitoring these and other key risks and considering how to respond to them.

- Lack or reduction of skilled resources due to difficulty retaining and recruiting staff members and also staff absence due to sickness
- Significant increase in the number of employing bodies causes strain on day to day delivery
- Significant external factors, such as national change, impacting on workload
- Issuing incorrect or inaccurate communications
- Failure to maintain scheme employer database leading to information not being sent to correct person
- Lack of clear communication to scheme employers, scheme members and pensioners.

Costs

All additional costs relating to this Strategy are met directly by the Fund unless mentioned otherwise.

Approval, Review and Consultation

This Communications Strategy was approved on **XX June** 2020 by the East Sussex Pension Committee. It will be formally reviewed annually and updated by the Committee at least every three years or sooner if the communications arrangements or other matters included within it merit reconsideration, including if there are any changes to the LGPS or other relevant Regulations or Guidance which need to be taken into account.

Further Information

If you require further information about anything in or related to this Communications Strategy, please contact:

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