



Derbyshire
Pension
Fund

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Communications Policy

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Introduction

This is the Communications Policy (the Policy) of Derbyshire Pension Fund (the Fund), administered by Derbyshire County Council, which sets out how the Fund communicates and engages with its stakeholders. The Policy has been developed in accordance with Regulation 61 of the Local Government Pension Scheme Regulations 2013 (Regulation 61) and takes into account guidance from The Pensions Regulator.

Regulation 61 requires that the Policy covers:

- the provision of information and publicity about the Local Government Pension Scheme (LGPS) to scheme members, representatives of scheme members and scheme employers
- the format, frequency, and method of distributing such information or publicity
- the promotion of the LGPS to prospective scheme members and scheme employers

This Policy also incorporates the Fund's plan for developing its communications over the 3-year period 2021 to 2024.

Derbyshire County Council's Pensions and Investments Committee, in its role as the Administering Authority of Derbyshire Pension Fund approved the policy at its meeting on 28 April 2021.

The Policy will be reviewed annually and revised when there is a material change to the Fund's methods of communication or engagement with its stakeholders.

1. The Fund's stakeholders and audience

Derbyshire Pension Fund currently has over 89,000 individual scheme members with approximately 106,000 separate pension records which are split by active and deferred membership, and pensioner membership where benefits are being paid.

The active membership (currently approximately 38,000) incorporates employees from over 330 participating employers. These employers range from Councils, Academies and Colleges to private companies who have been contracted to deliver public services.

The Fund's stakeholders and other organisations with which it regularly communicates include:

- Active members - who are paying into the LGPS
- Deferred members - whose LGPS benefits are 'on hold'
- Pensioner members - whose LGPS benefits are being paid
- Representatives of scheme members
- Prospective scheme members - employees who can join the LGPS, but who are not currently paying in
- Scheme employers
- Pension Fund team
- Elected Councillors on the administering authority's Pensions and Investments Committee
- Members of the Local Pension Board
- Other external bodies, including:
 - Ministry of Housing, Communities and Local Government (MHCLG)
 - Her Majesty's Revenue & Customs (HMRC)

- Department of Work and Pensions (DWP)
- Pension Fund's Actuary, Hymans Robertson LLP
- Other LGPS Funds
- Public service pension schemes (for example the Teachers' Pension Scheme and NHS Pension Scheme)
- Other pension schemes
- Trades Unions
- Pension Fund Investment Managers, Advisers and Actuaries
- The Pensions Regulator (TPR)
- The Pensions Ombudsman
- The Scheme Advisory Board (SAB)
- The Local Government Association (LGA)
- Pension Officers' Groups
- AVC providers

The Fund recognises that a variety of methods of communication are required to engage effectively with different groups of stakeholders.

2. Objectives

The Fund's overriding objective is to ensure that it delivers clear, timely and accessible communications to its stakeholders. The Fund aims to achieve this by delivering communications to its stakeholders which are:

- **Targeted** - with the aim of delivering clear, accurate and effective communications to each different audience group, in terms of the style of content and the method of delivery.
- **Easy to understand** – providing clear and easy to follow explanations of pension issues, particularly where pension related decisions are being made.
- **Accessible** - ensuring that all scheme members and other stakeholders can access the Fund's services, online content, and communications equally.
- **Cost effective** – providing value for money by utilising technology to its fullest potential.

By communicating in this way, the Fund aims to:

- Communicate information about the Scheme's rules and regulations in an effective, jargon-free, and timely manner to the different groups of customers and stakeholders to enable them to make fully informed pensions decisions
- Keep members, employers and other stakeholders informed about the management and administration of the Fund
- Keep members, employers and other stakeholders informed about the Fund's investment portfolio
- Consult with key stakeholders on changes to policies and procedures that affect the Fund and its stakeholders

- Seek to continually improve the Fund's communication methods by requesting and analysing feedback
- Promote the LGPS as an attractive benefit to Scheme members and an important tool in recruitment to employers
- Work with employers to enable them to fulfil their responsibility to communicate and share information with members in relation to the Scheme
- Maintain the Fund's commitment to regional and national initiatives, taking advantage of partnership working and innovative communication methods developed and tested elsewhere, and sharing the Fund's own experience in return
- Enable equality of access to Pension Fund communications
- Manage information securely to the standards required by the Data Protection Act 2018

3. Accessibility

The Fund aims to ensure that all members can equally access its services, online content and communications, and is committed to increasing digital access and delivery of services making the best use of technology.

The Fund's website is designed to ensure that new content meets the World Wide Web Consortium Accessibility Guidelines (version 2.1 AA standard), which is currently the recommended minimum standard for all council hosted websites. Alternative methods of communications will continue to be offered as required.

The Fund offers a Pensions Helpline (phone contact number 01629 538704), which is available for anyone having trouble accessing or understanding any of the Fund's documents.

4. Communication methods

The Fund has developed a variety of communication methods to ensure that all stakeholders are informed and up to date with LGPS and Fund developments. A number of these communication methods are targeted at specific stakeholder groups and are set out later in this policy.

The following methods are used to communicate with all stakeholders:

Derbyshire Pension Fund website

The Fund's website derbyshirepensionfund.org.uk is its primary source of generic LGPS and Fund specific material, with sections providing an extensive information resource for all existing and prospective members and Fund employers. Resources include:

- easy to understand content
- videos on specific LGPS matters
- forms and guides
- links to other official websites
- an online pension calculator

The website also has sections dedicated to the Fund's governance arrangements including its policies, strategies and other statements.

The website has been designed to be easily browsed, accessible and user friendly from desktop, laptop, tablet and smartphone devices.

As well as an information resource on the LGPS, the website contains downloadable forms and factsheets for members on a range of topics, including the Scheme guide, Additional Voluntary Contributions (AVCs), transfers etc.

It also includes several online forms available at derbyshirepensionfund.org.uk/contact-us which enable members to engage quickly and easily with the Fund.

These include forms for:

- member enquiries
- member feedback in respect of their experience in engaging with the Fund
- complaints from members in respect of their LGPS membership and / or the Fund's service delivery
- representatives of recently deceased members to notify the Fund of the member's death

Online forms have also been developed to enable employers to:

- inform the Fund of outsourcing arrangements which impact on individual's LGPS eligibility and membership (derbyshirepensionfund.org.uk/admissionbodies)
- Microsoft Office 365 forms to respond to consultations
- Microsoft Office 365 forms to provide feedback on training delivered by the Fund

All forms embedded on the website are securely transferred upon submission to the appropriate Fund email inbox.

The website will also allow members to easily access the Fund’s online member self-service portal ‘My Pension Online’, which is planned to be rolled out on a phased basis from May 2021.

The Fund will continue to maintain and develop its website and ensure it remains its primary source of Fund and LGPS information for members and employers.

Google Analytics is used to collect information about how visitors use the Fund’s website. This information is not used to identify visitors to the website but is used to analyse traffic and engagement with a view to improving the user experience.

Email communications

The Fund maintains several secure email inboxes used by members and employers for the submission of general and individual enquiries, the provision of information and other directed information. The details of each inbox and their purpose is explained in the following table:

Email inbox address	Purpose
pensions@derbyshire.gov.uk	A general inbox for enquiries from members, including those submitted online via the Fund’s website on the enquiry form and death notification form.
dpfemployers@derbyshire.gov.uk	For employers to submit notification forms and other information relating to individual members.
pensions.tech@derbyshire.gov.uk	For employers to submit multi-member data returns, contribution payment reports and other payment and data based enquiries
pensions.regs@derbyshire.gov.uk	For queries relating to LGPS regulations, communications, employer training, all Fund events, appeals, and enquiries submitted online via the Fund’s website on the feedback form and the complaints form
pensions.iconnect@derbyshire.gov.uk	For employer queries about the Fund’s secure data transmission service, i-Connect
pensions.mss@derbyshire.gov.uk	For enquiries about the “My Pension Online” service

Telephone enquiries

The Fund has a dedicated Pensions Helpline number (01629 538900).

The Helpline is currently available Monday to Friday 10.00am to 3.00pm.

Policy and strategy documents

The Fund’s policy and strategy documents are published on the Fund’s website and printed copies are available on request. News items are posted on the Fund’s landing page when new or updated policy/strategy documents are published. Key documents include:

- **Annual Report** for the Fund which is prepared and published each year. The report sets out for the relevant financial year, the Fund’s:
 - governance arrangements
 - financial performance
 - investment management arrangements and performance

- funding position
- and scheme administration arrangements and performance

It also includes a copy of the most up to date actuarial valuation of the Fund, together with the Fund's main policy statements and the Fund's Statement of Accounts for the financial year. All participating employers are notified when the Annual Report has been published.

- **Funding Strategy Statement** which focuses on how employer liabilities are measured, the pace at which the liabilities are funded and how employers, or pools of employers, pay for their own liabilities. It is prepared by the County Council as the administering authority of the Pension Fund in collaboration with the Fund's actuary and following consultation with the Fund's employers and other stakeholders.
- **Investment Strategy Statement** which sets out the long-term investment strategy of the Pension Fund. It is prepared by the County Council, as the administering authority of the Pension Fund in collaboration with the Fund's independent investment adviser and following consultation with the Fund's stakeholders.
- **Responsible Investment Framework** which sets out the Fund's approach to responsible investment including the integration of environmental, social and governance considerations into the investment process and Fund stewardship and governance activities.
- **Climate Strategy** which sets out the Fund's approach to addressing the risks and opportunities related to climate change.

Communications to members

There are 3 categories of Scheme member:

- **Active members** who are contributing to the Scheme
- **Deferred members** who have left the Scheme, but have not yet accessed their pension benefits
- **Pensioner members** who are in receipt of their pension

When the Fund's member self-service portal has been rolled out, scheme members will be able to access their pension information by registering for '**My Pension Online**':

derbyshirepensionfund.org.uk/mypensiononline

The online portal will be a secure area, allowing members to view and update some of their personal details held by the Fund. Active and deferred members will also be able to view their latest, and previous, Annual Benefit Statements.

It is expected that member registration will take time to build, however, the Fund will promote the benefits of registration to all members and will work closely with employers to encourage active members to register.

The Fund also uses a variety of other methods to communicate with scheme members and differentiates between the categories of membership when delivering messages to each specific audience group.

- **Communication with active members**

On joining the Scheme, new active members are provided with:

- confirmation of their LGPS membership
- a link to the Scheme information on the website
- forms and information to enable them to request a transfer-in of any previous eligible pensionable service

Each year, the Fund provides annual benefit statements to active members. These statements summarise a member's pension account balance to the previous 31 March. These statements are currently posted to members' home addresses. The provision of these statements is subject to scheme employers providing timely year end information to the Fund.

Following the implementation of the 'My Pension Online' portal, annual benefit statements will be available to view on individual member accounts as standard practice. The exception to this will be if a member has notified the Fund that they wish to continue to receive paper copies.

The Fund also produces an active member newsletter each year in collaboration with a regional Joint Communications Group, which is published on the Fund website. Active members are directed to the newsletter by a link provided in their annual benefit statement. The content comprises current pension topics within the LGPS and the pensions industry in general, plus important repeated messages.

Face-to-face meetings with active members are arranged when it is appropriate to do so. These are delivered by the Fund's Regulations and Communications Team in the form of 'Understanding your LGPS pension' presentations and drop-in sessions at various venues around the County hosted by scheme employers. The presentations help to explain the significant changes in the LGPS regulations over time, and to assist where an employer is going through a restructuring or outsourcing exercise that will have pension-related implications. Drop-in sessions are targeted to coincide with events, such as the issue of the annual benefit statements. The nature of the drop-in sessions means that members can meet the team informally and ask questions they may have about their pension at a convenient time for them.

Opportunities for members to meet with members of the Fund's team or join virtual group sessions on Microsoft Teams, are being developed as an alternative to face-to-face meetings.

- **Communication with deferred members**

Each year the Fund provides annual benefit statements to deferred members. These statements summarise a member's pension account balance to the previous 31 March. These statements are currently posted to members' home addresses.

Following the implementation of the 'My Pension Online' portal, annual benefit statements will be available to view on the individual member's account, however, they will continue to be printed and posted to members who notify the Fund that they wish to continue to receive a paper copy.

The Fund also produces a deferred member newsletter each year in collaboration with a regional Joint Communications Group and publishes it on the Fund website. Deferred members are directed to the newsletter by a link provided in their annual benefit statement. The content comprises current pension topics within the LGPS and the pensions industry in general, plus important repeated messages.

- **Communication with pensioner members**

The Fund issues pay advice slips to pensioners each March, April and May notifying them of the percentage rate of annual pension increase and explaining how it is applied. Pensioners will also be sent further payslips to alert them to any further variations in their net monthly amount of 1% or more. The Fund issues P60s annually in respect of the pension received in the previous financial year.

The Fund participates in the National Fraud Initiative and may share information with other bodies responsible for auditing or administering public funds for the purpose of preventing and detecting fraud. The Fund includes brief details about the National Fraud Initiative on payslips for pensioner members at least once per year. The details provided include a link to the Derbyshire County Council website for more information:

derbyshire.gov.uk/nationalfraudinitiativeprivacynotice

Life certificates, or an alternative secure electronic solution, are delivered each year by the Fund, or by a specialist tracing service working on behalf of the Fund, to pensioners living abroad to ensure that they maintain eligibility for their pension benefits (derbyshirepensionfund.org.uk/lifecertificate).

The aim of the Life Certificate is to reduce the liabilities which result from pension overpayments following the death of pensioner members living overseas.

The Fund's arrangements for the issue and delivery of Life Certificates or a secure electronic alternative are reviewed regularly.

- **Communication with prospective members**

Prospective scheme members are provided with basic information on the LGPS by their employer. Employers are supported in promoting the scheme to all their employees and information is provided to employers to signpost their employees to the Fund's website and to highlight the benefits of LGPS membership.

Communications with scheme employers

The Fund's latest **Pension Administration Strategy** became operational on 1 April 2021 and aims to promote good working relationships between the Fund and its participating employers in order to support the delivery of a high-quality service to members. It sets out clearly the standards of performance and best practice that the Fund and its employers should aim to meet when carrying out their LGPS related functions and responsibilities.

Face to face large-scale employer events are provided at various venues when it is appropriate to do so; some are aimed at all employers and others targeted at specific groups, such as academies. Site visits and workshops are also undertaken, when appropriate, to assist individual employers with

specific issues and / or provide direct training to their staff. The visits are often requested by employers, but the Fund is also proactive in identifying opportunities to assist employers.

Individual meetings with employers also take place via Microsoft Teams and opportunities for virtual group employer events are being developed.

Employers are kept up to date with developments which impact on their application of the LGPS regulations by employer newsletters, which are emailed to nominated employer contacts through gov delivery. At least one employer newsletter is produced each quarter, however, at times when several important messages need to be delivered to employers, more frequent newsletters will be issued.

The Fund monitors engagement with the employer newsletters by interpreting the delivery data (delivered, pending and bounced percentages) and performance data (opened and unsubscribes percentages) provided on gov delivery reports. A further in-depth report can also be run to assist the Fund in maintaining an up to date circulation list of employer contacts where emails have bounced or failed.

Communications with Pension Fund team

It is important to ensure that all members of the pension fund team have access to the relevant information and technical knowledge to enable them to perform their duties, to understand their role in the delivery of the Fund's services, and to be aware of the wider context of the Local Government Pension Scheme. This is achieved via use of email, internal meetings, team briefings as well as internal and external training events on specific topics.

Pensions and Investments Committee

The Pensions and Investments Committee meets six times a year. It is responsible for the management and administration of the Fund on behalf of the County Council. Members of the Fund's team work closely with the Chair, Deputy Chair and Members of the Committee to ensure that they are fully informed about Fund matters and that they are fully supported in fulfilling their duties and responsibilities.

Members of the Committee receive reports from Fund officers on matters to be determined or reviewed.

These reports include:

- quarterly investments reports
- other investment related updates
- half-year administration reports
- reviews of new LGPS related legislation
- determination of local policies
- reviews of the Fund's Risk Register
- Annual Report and Annual Service Plan
- the adjudication of appeals and disagreements at Stage 2 of the adjudication process.

Two trade union representatives are entitled to attend meetings of the Committee as non-voting members and to receive all the Committee papers.

Minutes of meetings (except for restricted items) are available from the Derbyshire County Council website: democracy.derbyshire.gov.uk/mgCommitteeDetails.aspx?ID=145

Derbyshire Pension Board

Derbyshire Pension Board assists Derbyshire County Council in its role as the administering authority of the Fund in complying with Scheme governance and administration responsibilities and complying with the relevant requirements of the Pensions Regulator. Members of the Pension Fund team work closely with the Pension Board, attending meetings which are held at least twice per year, and ensuring that they have the information necessary to fulfil their duties and responsibilities.

Information about the Pension Board and summaries of Pension Board meetings are published on the Fund's website: derbyshirepensionfund.org.uk/pensionboard

5. Plan for the development of communications 2021 – 2024

Communication is a fundamental part of all Pension Fund activity.

Meeting the Fund's objective of delivering clear, timely and relevant communication to all stakeholders as the Local Government Pension Scheme becomes more complex, with increasing governance obligations requires the Fund to continually improve and develop its communications.

With assistance and support from Derbyshire Pension Board, the following medium term communication-related objectives have been identified:

- The member self-service portal "My Pension Online" becoming operational
- Improved member feedback, including a Member Forum
- Continued development of the Fund's website
- Development of a Fund Style Guide
- Further development of employer engagement

Implementation of My Pension Online

This is the member self-service portal to enable scheme members to view certain parts of their pension information, including their annual benefit statement, securely online at any time; members will also be able to submit a number of changes to personal details via the portal, and carry out benefit projections online.

Management and development of the portal is undertaken by the Fund in liaison with Aquila Heywood, the supplier of the Fund's pension administration system, who will host the portal.

Members will be encouraged to register for 'My Pension Online' through communications from the Fund and from employers. Initially, the Fund will concentrate on the registration of active and deferred members.

The Fund is aiming for 15% registration of active and deferred members in year 1, based on the experience of other pension funds offering this service, however, planning will encourage and cater for the possibility of a higher take up. The Fund will continually review and re-evaluate registrations targets.

Other Member Engagement

The Fund will set up a Member Forum once the member self-service system has been established. Ensuring that this forum has a broad range of fund member representation will be vital to its success.

Continued development of the Fund's website

Members will access 'My Pension Online' via the Fund's website, so there will be a natural increase in the awareness of, and visitors to, the website.

This provides an opportunity for the website to reach the notice of a higher proportion of the member population. Ensuring the site remains up to date with easy to understand, user-friendly content, and with increasing interactivity, will be vital. This will be aided by digital technology such as Google Analytics, which will help the Fund to further analyse traffic and engagement and support the ongoing improvement of the user experience.

Additionally, as a public service website, the Fund will be required to ensure that it reaches and maintains full compliance with accessibility law and guidance (WCAG 2.1 – Web Content Accessibility Guidelines). This will include ensuring that all content is accessible, including the publication of future Fund documents in accessible formats or as webpages.

Fund style guide

As the Fund writes to different audiences, and produces different types of media, a bespoke style guide will help multiple authors to write in a clear and unified way that reflects the Fund's style.

Writing simple, readable and understandable text on complex and difficult topics across a range of communications from letters and emails to forms, guides and website content, is a significant challenge for the Fund's team.

Preparing a style guide will provide benefits including:

- Consistency
- Clear messages
- Time saving
- Improved communications between teams
- Increased efficiency
- Prevention of complaints
- Clarity on a consistent voice
- Setting a tone for the Fund
- An increased professional look and feel
- Increased user confidence
- Easily accessible information
- Brand recognition

Letters Project

Aided by a style guide, a project to review approximately 500 standard letters, and provide accurate and easy to understand content, will provide a significant benefit for the Fund's members.

Subjects to cover in improved member engagement

Increased engagement will focus on providing information which will enhance member understanding of the Fund and its activities and should contribute to a reduction in the number of queries received through the Helpline, the online enquiry form, emails and written correspondence

- The benefits of the scheme (to prospective and existing members)
- Increased information on how the Fund's assets are invested
- Increased information about the governance of the scheme
- The need to keep contact details up to date
- Pension scams
- Annual allowance

Continued implementation of i-Connect

i-Connect is the Fund's secure data transmission service which is enabling employers to automate the submission and validation of their data resulting in more efficient and timely data submissions and the more effective resolution of queries. By April 2021, approximately 50% of the Fund's employers had implemented i-Connect covering approximately 60% of the total of active members.

The Fund's target is for all employers to be working towards implementing i-Connect by the end of 2021.

Employer engagement

The Fund will continue to develop its engagement with employers:

- during the admissions process
- during onboarding to i-Connect
- via its regular communications to fund employers throughout an employer's participation in the Fund
- in the run up to employer exits from the Fund

Communications will support:

- Employers to understand their responsibilities
- The continued development of employer covenant reviews
- Employers to improve their engagement with their outsourced providers and to improve understanding of risk-sharing arrangements
- Closer Fund relationships with resolution bodies (Town and Parish Councils)
- Engagement with employers on new employer flexibilities following the development of an employer flexibilities policy

6. Communications Policy review

This Communications Policy will be reviewed annually and revised if the communications arrangements merit reconsideration, including if there are any changes to the LGPS or other relevant regulations or guidance which need to be taken into account. Progress against the communication-related objectives will be reported to the Pensions and Investments Committee.