

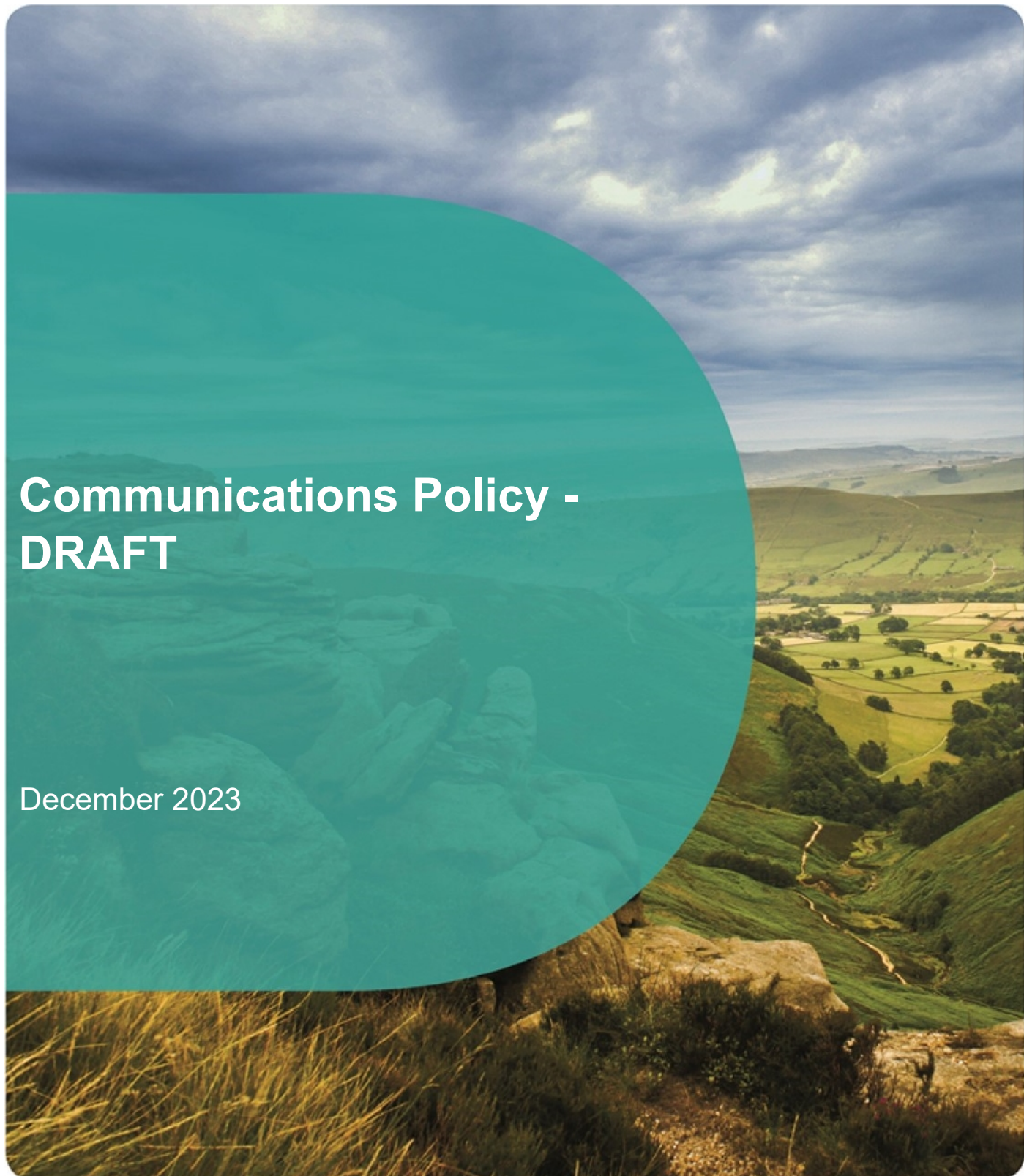
APPENDIX 2



County Hall, Matlock, Derbyshire, DE4 3AH

derbyshirepensionfund.org.uk

Administered by Derbyshire County Council



Communications Policy - DRAFT

December 2023

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1. Background

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 plans for developing its communications over the 3-year period 2024 to 2027.

Progress will be reviewed annually, and the policy will be reviewed at least every 3 years or when there is a material change to the Fund's methods of communication or engagement with its stakeholders.

The Pensions Regulator oversees pension schemes and provides guidance on how they should best be governed and administered. This includes guidance on communicating with scheme members in a way that, as well as being accurate, is clear and simple to understand and avoids jargon. Much of what the Fund is required to communicate to scheme members, and time limits on these communications is set out in regulation. To ensure compliance with these regulations, the Fund has appropriate internal controls in place.

2. The Fund's stakeholders and audience

The Fund currently has over 93,000 individual scheme members with approximately 110,000 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 340 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 not yet due for payment
- 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 Derbyshire Pension Board

Other external bodies including:

- Department for Levelling up, Housing and Communities (DLUHC)
- Her Majesty's Revenue & Customs (HMRC)
- Department of Work and Pensions (DWP)
- The Fund's Actuary, Hymans Robertson LLP
- Other LGPS funds
- Other Public service pension schemes (for example the Teachers' Pension Scheme and NHS Pension Scheme)
- Other pension schemes
- Trade Unions
- 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.

3. 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 or summary 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** to help save resource, time and expenditure

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 members, employers and other 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
- 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 for 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 Fund communications
- Manage information securely to the standards required by the Data Protection Act 2018

4. Accessibility

The Fund aims to broaden inclusion to ensure all members have equal access to its services, online content, and communications, and is committed to increasing digital access and delivery of services, making the best use of technology.

In respect of online content, public sector organisations have a legal duty to make sure their websites meet accessibility requirements, currently set at compliance with World Wide Web Consortium Accessibility Guidelines (WCAG version 2.1 AA standard), published by the Worldwide Web Consortium, which requires that a website must be accessible by making it 'perceivable, operable, understandable and robust'.

The Fund's website is designed to ensure that new content meets the WCAG version 2.1 AA standard, which is currently the recommended minimum standard for all council hosted websites, and its Accessibility Statement, which is held at derbyshirepensionfund.org.uk/accessibility, sets out how documents held on the website meet those standards.

Regular analysis of the accessibility of the content and functionality of the website is undertaken using Silktide which is an online tool which identifies issues for attention across the website: silktide.com/glossary/accessibility-audit/

The Government Digital Service, which monitors public sector bodies' compliance with accessibility requirements, is currently reviewing how to assess WCAG 2.2 with a view to monitoring the accessibility of public sector websites on new criteria from October 2024. WCAG 2.2 was formally approved in October 2023 by the Worldwide Web Consortium as the most up-to-date international standard for web accessibility.

The Fund will review and identify changes required to meet the requirements of WCAG 2.2 following the Government Digital Service's assessment.

All print and electronic communications are designed with consideration for those with additional needs, with alternative formats such as large print or braille available on request.

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

5. How we communicate

The Fund has developed a variety of communication methods to ensure that all stakeholders are informed and up to date. 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:

5.1 Derbyshire Pension Fund website

The Fund's website derbyshirepensionfund.org.uk is its primary source of generic and Fund specific LGPS 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 on important features of the LGPS
- links to other official websites, including the Fund's My Pension Online platform
- online forms for secure, quick, and easy completion

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 which enable members to engage quickly and easily with the Fund.

These include forms for:

- member enquiries
- starting the registration process for My Pension Online
- 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 an individual's LGPS eligibility and membership: derbyshirepensionfund.org.uk/admissionbodies
- respond to consultations via Microsoft Office 365 forms
- provide feedback on training delivered by the Fund via Microsoft Office 365 forms

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

The website also enables members to easily access the Fund's online member self-service portal My Pension Online, which was launched in June 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.

5.2 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
pensions.bookings@derbyshire.gov.uk	For enquiries and bookings on events arranged by the Fund
pension.board@derbyshire.gov.uk	For submitting queries and comments to Derbyshire Pension Board
pensions.mcCloud@derbyshire.gov.uk	For submitting queries relating to pensions which may be affected by changes to regulations following the McCloud judgement

5.3 Telephone enquiries

The Fund has a dedicated Pensions Helpline number (01629 538900) for members to contact the Fund.

The Helpline is currently available Monday to Friday 9.00am to 5.00pm.

5.4 My Pension Online

Scheme members are able to access their pension account by registering for My Pension Online: derbyshirepensionfund.org.uk/mpo

The My Pension Online platform is hosted by Aquila Heywood which provides the Fund's pension administration system.

The online platform is a secure area, allowing members to view and update some of their personal details held by the Fund. Active and deferred members are also able to view their latest, and previous Annual Benefit Statements and run their own pension estimates. As the service continues

to develop and registrations increase, more correspondence and the issuing of pension documents will be online and, as a result, provide a more timely service to members and consequently reduce printing and postage.

Since launching in June 2021, the Fund has concentrated developments on, and promoted registrations from, active and deferred members as the service's functionality is fundamentally based on scheme membership before retirement. As at the date of this policy being prepared, approximately one in three of the overall active and deferred membership had completed their registration.

As part of the initial registration process, members are required to provide their personal email address to the Fund by completing a secure online form on the Fund's website.

My Pension Online is continuing to be developed including a review of an updated version of the platform developed by the system provider, Aquila Heywood. It is labelled as the Transformational Member Experience and will include improvements to the service's registration process and the introduction of two-factor authentication to provide an extra layer of security. The Fund will continue to monitor this development as part of its ongoing review of the service's available functionality.

In respect of encouraging registrations from active and deferred members, the Fund works extensively with employers and also provides information to members about the service in letters and other communications where the opportunity arises.

Types of scheme member

There are three 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.

It is recognised that communication with each category requires a different, specific and targeted approach.

5.5 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 previous pensionable service with other LGPS Funds or other public service pension schemes

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 and are issued to each member's My Pension Online account. An email is sent to the member when their annual benefit statement is available.

The exception to this is if a member has notified the Fund that they wish to continue to receive paper copies.

A letter is currently issued to each member who has not registered for My Pension Online to inform them that their annual benefit statement is available, with guidance on the steps to begin the registration process.

The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 require that members are notified on at least two occasions that information (such as their annual benefit statement) is being issued on a website and asked to provide their email address for registration purposes. The Fund is, at present, continuing to write to unregistered members to notify them when their annual benefit statement is available on My Pension Online. This communication is reviewed each year.

The provision of annual benefit statements is subject to scheme employers providing timely and accurate information to the Fund.

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.

Individual meetings and information sessions with active members are offered through their employer and are undertaken either virtually or in-person. These are mainly delivered in the form of “Understanding your LGPS pension” presentations and drop-in sessions at venues around the county hosted by scheme employers.

The presentations are delivered to help explain any 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 may be targeted to coincide with events, such as the issue of the annual benefit statements. The nature of the drop-in sessions allow that members can meet an experienced member of the Fund team informally and ask questions they may have about their pension.

5.6 Communication with deferred members

Each year, the Fund provides annual benefit statements to deferred members.

These statements summarise a member’s pension account balance at the first Monday after the start of the new financial year and are issued to each member’s My Pension Online account. The exception to this is if a member has notified the Fund that they wish to continue to receive paper copies.

As with the procedure for active members, a letter is currently issued to each deferred member who has not registered for My Pension Online to inform them that their annual benefit statement is available, with guidance on the steps to begin the registration process.

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.

5.7 Communication with pensioner members

The Fund's pension payroll is currently provided by Derbyshire County Council's HR services. The Council, as part of its service provision, issues pay advice slips to pensioners to coincide with their first pension payment and subsequently at each March, April and May. The April pay advice includes information about 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. P60s are issued 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 alternative electronic solutions, are issued annually to pensioners living abroad to ensure that they maintain eligibility for payment of their pension (derbyshirepensionfund.org.uk/lifecertificate). The Fund currently engages a specialist tracing service, Target Professional Services, to aim to reduce the liabilities which result from pension overpayments following the death of pensioner members living overseas, via the use of secure electronic solutions.

5.8 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.

5.9 Communication with scheme employers

The Fund's Pension Administration Strategy is reviewed annually. It sets out 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.

The Strategy also sets out the approach the Fund will take to underperformance by employers, including a structure for the charging of avoidable administration costs.

The Fund provides training, virtually or in-person, to assist individual employers with specific issues and / or provide direct training to their staff. The sessions can be booked directly by employers, but the Fund is also proactive where it identifies that an employer would benefit from assistance.

Employers are kept up to date with developments which impact on their application of the LGPS regulations by monthly employer newsletters, which are emailed to nominated employer contacts.

The Fund monitors engagement with the employer newsletters by interpreting the delivery data provided through system delivery reports. A further in-depth report is also reviewed to assist the Fund in maintaining an up-to-date circulation list of employer contacts where emails have bounced or failed.

5.10 Communication 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.

6. Pensions and Investments Committee

The Pensions and Investments Committee meets approximately six to eight times each year, including training sessions on at least two occasions per year. It is responsible for the management and administration of the Fund on behalf of the 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
- summaries of the adjudication of appeals and disagreements

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

7. Derbyshire Pension Board

The Derbyshire Pension Board was set up to assist Derbyshire County Council in its role as the administering authority in complying with relevant requirements of Scheme governance and administration responsibilities and complying with the requirements of the Pensions Regulator.

The Board comprises an independent Chair, two Employer Representatives and two Member Representatives.

Members of the Fund's team work closely with the Pension Board, attending meetings which are held at least twice per year, and ensuring that Board members can fulfil their duties and responsibilities.

Board members are invited to attend meetings of the Pensions and Investments Committee as observers and receive all Committee papers prepared for each meeting. Board members are also invited to training sessions delivered to the Committee.

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

8. Plan for the development of communications 2024 – 2027

Communications is a fundamental part of all 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.

Additionally, there is greater expectation that digital platforms will continually advance, including in meeting accessibility standards.

The following have been identified as key communication-related objectives over the three-year period to 2027:

- Continuing development of the My Pension Online platform to improve functionality for the member experience
- Encouraging increased member engagement and understanding of the LGPS and understanding of the LGPS, including the development of a member engagement forum
- Continuing to improve methods of communication with the aim of broadening inclusion to ensure that all stakeholders are able to access and engage with the Fund's services
- Increasing consistency of communications ensuring that content is accurate, easy to understand and helpful to members and employers
- Improving engagement with all participating employers

8.1 Development of My Pension Online

The Fund introduced My Pension Online in 2021 to improve the service provision for scheme members. The service enables members to securely access their LGPS membership information at any time, as well as being able to update some of their personal details.

Since 2021 approximately 25,000 active and deferred scheme members have registered to access their My Pension Online account enabling them to check the personal details held by the Fund, access their LGPS membership history and latest Annual Benefit Statement, support retirement planning through the ability to run unlimited pension estimates from live data and submit queries directly from My Pension Online.

The development by the system provider, Aquila Heywood, of a Transformational Member Experience programme for the My Pension Online platform aims to improve the presentation of members' LGPS information, simplify the registration process and add a further layer of security.

The Fund will continue to monitor this development of the enhanced platform as part of its ongoing review of the service's available functionality.

8.2 Increased Member Engagement

Approximately 1-in-3 active and deferred members have registered for My Pension Online to potentially increase their engagement with the Fund and the LGPS in general. Therefore, 2-in-3 members are still to register.

The Fund will continue its campaign to promote registration both directly with members and through participating employers.

Higher levels of registration will enable the Fund to further develop and increase the correspondence issued to members electronically and, as a result provide more timely communications and reduce printing and posting levels.

The Fund is also progressing plans to set up a Member Engagement Forum.

To ensure that the Forum has a broad range of Fund member representation all members will be offered the opportunity to express interest in taking part.

The aims of the Forum will include:

- seeking to promote understanding of the LGPS
- providing an opportunity to receive feedback on members' experiences of Fund services
- discussing developments in the Fund's communications with members, such as sharing key messages, and
- obtaining opinions on website changes, including My Pension Online

8.3 Accessibility of Fund services

Improving the accessibility of the Fund's services is an important ongoing target as the expectation for digital development increases.

Statistics from the government's [Family Resources Survey](#) for 2021/ 2022 show that almost 1 in 4 people reported having a disability which may include visual, hearing, motor or cognitive impairments.

The challenge of ensuring that the Fund's services are accessible relates, not only to the presentation of online content, but also to making content clear and concise.

Improving the accessibility of the Fund's digital content will have a positive impact for users, including those who find technical and jargon-heavy language difficult to engage with.

The concept of accessibility also applies to users who may have different needs at different times and in different circumstances such as where they are when accessing the Fund's content, their health and also the device they are using.

Understanding – The Fund will aim to ensure that its communications are as accessible as possible by the use of short sentences, sub-headings to explain what a section of content covers and easy to understand language.

Presentation – The Fund will aim to ensure its digital content is inclusive and accessible, including choice of a suitable font, font size, colour text and backgrounds and, where possible, limited use of pdf attachments (pdf attachments are often inaccessible for some users, difficult to use on mobile devices and resource heavy in keeping up to date).

The Fund will aim where possible, to present content which may previously have been prepared in pdf form, as website pages. Where pdf is the only suitable method of presentation, they will be prepared as accessible as possible to ensure content is searchable, has clear and descriptive headings and images have clear and descriptive alternative text.

Training – The Fund will aim to develop understanding and deliver training to highlight the importance of making the service accessible to all, including digital content and the style of standard and non-standard communications.

8.4 Consistency in communications

Development of a Fund style guide is continuing, and the scope is extending to include accessibility as a core objective.

Benefits that a style guide will bring include:

- consistency
- clear messaging
- time saving
- improvements in communications between teams
- greater efficiency
- prevention of complaints
- provision of a consistent tone
- provision of a professional look and feel
- building of confidence
- making information easily accessible
- recognition of the Fund's identity

8.5 Letters Project

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

8.6 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

8.7 Continued implementation of i-Connect

i-Connect is the Fund's secure data transmission service which is enabling employers to provide efficient and timely data submissions to the Fund. By November 2023 approximately 80% of the Fund's employers had implemented i-Connect covering approximately 90% of the total of active members.

i-Connect provides benefits to employers and the Fund through reductions in cost and risk associated with data submissions and processing.

8.8 Employer communications

Ongoing improvements in employer communications will be targeted to 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

9. Communications Policy review

The policy will be reviewed in the event of changes to regulations or procedures, or to reflect technological or best practice developments. A full review of the policy and the Fund's strategy for the development of its communications will be undertaken at least every three years.

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