

CLWYD PENSION FUND COMMITTEE

Date of Meeting	Wednesday, 15 th June 2022
Report Subject	Communications Strategy Review
Report Author	Pensions Administration Manager

EXECUTIVE SUMMARY

The LGPS Regulations 2013 require that each administering authority must prepare, maintain and publish a written statement setting out its policy concerning communications with its key stakeholders. The Clwyd Pension Fund's Communications Strategy was last fundamentally reviewed in March 2016.

Methods of communicating are quickly evolving with a much greater focus on digital communications. There is also much more awareness of the necessity to make communications more inclusive by allowing for the diverse needs of stakeholders, which means a complete move to digital communications only is not appropriate.

Accordingly the officers of the Fund, working with Aon communication specialists, have carried out a fundamental review of the Fund's Communications Strategy.

A key outcome of the proposed new Strategy should be that a greater proportion of stakeholders will understand the benefits of the scheme, whilst reducing the need for face to face meetings (virtual or otherwise) and phone calls which are inefficient and evidence a lack of effective alternative communications.

The Committee are asked to approve the updated Strategy which is included in Appendix 2.

RECOMMENDATIONS

1	That the Committee review and approve the updated Communications Strategy.
---	----------------------------------------------------------------------------

REPORT DETAILS

1.00	STRATEGY FOR APPROVAL
1.01	<p><i>Background</i></p> <p>The LGPS Regulations 2013 require that each administering authority must prepare, maintain and publish a written statement setting out its policy concerning communications with:</p> <ul style="list-style-type: none">• members• representatives of members• prospective members and• Scheme employers. <p>The statement must include the Fund's policy on:</p> <ul style="list-style-type: none">• the provision of information and publicity about the Scheme to members, representatives of members and Scheme employers• the format, frequency and method of distributing such information or publicity and• the promotion of the Scheme to prospective members and their employers.
1.02	<p>The Pensions Regulator (TPR) also includes expectations in its Code 14: Governance and administration of public service pensions schemes. It states:</p> <p><i>“Schemes should design and deliver communications to scheme members in a way that ensures they are able to engage with their pension provision. Information should be clear and simple to understand as well as being accurate and easily accessible. It is important that members are able to understand their pension arrangements and make informed decisions where required.”</i></p>
1.03	<p>TPR will shortly be issuing a Single New Code (which will replace Code 14) and the new Code is also expected to include requirements relating to effective communications. The draft Code includes the following:</p> <p><i>“When preparing communications to members, the governing body should:</i></p> <ul style="list-style-type: none">• <i>ensure that all communications sent to members are accurate, clear, concise, relevant and in plain English</i>• <i>regularly review member communications, taking account of member feedback</i>• <i>when deciding on the format of communications and information to be published, consider any technology that may be available to them and appropriate for their members</i>• <i>consider using various communication methods, including</i>

	<p><i>accessible online content, audio, Braille, large font, and languages other than English</i></p> <ul style="list-style-type: none"> • <i>regularly inform members of the impact their contributions will have on their overall benefits</i> • <i>provide any additional information or explanation that members may need to help them make informed decisions about their benefits.”</i>
1.04	<p>The Fund has approximately 49,000 scheme members and over 50 employers. The quality and effectiveness of communications are critical to help its stakeholders understand the benefits of the LGPS and ensuring employers understand their role in helping to manage the Fund.</p>
1.05	<p>The Clwyd Pension Fund’s Communications Strategy was last fundamentally reviewed in March 2016 and it has been subject to some changes since then. The current Strategy can be viewed on the Fund’s website here. It includes the following objectives which on the face of it are still quite relevant.</p> <ul style="list-style-type: none"> • Promote the Scheme as a valuable benefit and provide sufficient information so members can make informed decisions about their benefits • Communicate in a clear, concise manner • Ensure we use the most appropriate means of communication, taking into account the different needs of different stakeholders, but with a default of using electronic communications where efficient and effective to do so. • Look for efficiencies and environmentally responsible ways in delivering communications through greater use of technology and partnership working. • Regularly evaluate the effectiveness of communications and shape future communications appropriately.
1.06	<p><i>Strategy review</i></p> <p>Methods of communicating are quickly evolving with a much greater focus on digital communications. There is also much more awareness of the necessity to make communications more inclusive by allowing for the diverse needs of stakeholders. In order to be fully inclusive, a variety of means of communication (not just digital) is still necessary. This is aligned with TPR’s expectations as can be seen from paragraph 1.02 and 1.03 above.</p>
1.07	<p>The Fund has made some fundamental changes recently, such as rolling out Member Self-Service and focussing on issuing benefit statements and newsletters digitally. However, the officers of the Fund recognised that a fundamental review of the Communications Strategy had not been carried out since it was created in 2016 and, given the fast-moving pace of methods of communicating and the need to ensure inclusivity (i.e. ensuring all stakeholders receive and understand communications), they felt it was</p>

	<p>appropriate to carry out such a review. Working with Aon’s communication specialists, the officers have considered alternative ways of communicating and developed a proposed new Communications Strategy. Part of this involved a workshop focussed on scheme member engagement (as the Fund’s biggest stakeholder) from which an Engagement Statement was developed which captures key elements of developing scheme member communications. This is included in Appendix 1 and it has been incorporated into the proposed Strategy.</p>
1.08	<p>The proposed new Strategy is included in Appendix 2. Although there is a lot of overlap with the existing Strategy’s objectives, the new Strategy is focussed on the following key areas:</p> <ul style="list-style-type: none"> • Improving member experience and enhancing self-service. • Identifying smart ways of working on the communications. • Simplifying language and communicating more concisely. • Refreshing the Fund’s visual identity. • Broadening delivery channels to members. • Developing a segmented approach to engagement. <p>A key outcome of the new Strategy should be that a greater proportion of stakeholders will receive relevant and focussed communications, and understand the benefits of the scheme, whilst reducing the need for face to face meetings (virtual or otherwise) and phone calls which are inefficient and evidence a lack of effective alternative communications. The proposed Strategy is well aligned to TPR requirements.</p>
1.09	<p>Committee and Board members were invited to a training session on 8 June which provided them with more information regarding the evolution of communications and the thinking behind the proposed Strategy.</p>
1.10	<p>The Committee are asked to approve the updated Strategy which is included in Appendix 2.</p>

2.00	RESOURCE IMPLICATIONS
2.01	<p>The Administration Team had a vacant role for a Communications Officer. Given the Strategy review, the skills required for this post have been reviewed to focus more on communications expertise, rather than pensions expertise. This post is currently being advertised and an update will be provided at Committee.</p>

3.00	CONSULTATIONS REQUIRED / CARRIED OUT
3.01	<p>None directly as a result of this report. However, as part of implementing the new Strategy, there will be greater engagement with scheme members to receive feedback on the effectiveness of communications.</p>

4.00	RISK MANAGEMENT
4.01	<p>There are a number of risks on the Fund’s risk register that directly relate to this Strategy and it is hoped that implementing the revised Strategy will assist with reducing these risks. The two main risks are:</p> <ul style="list-style-type: none"> • Employers don’t understand or meet their responsibilities resulting in the Fund being unable to meet legal and performance expectations (including inaccuracies and delays) • Communications are inaccurate, poorly drafted, insufficient, or not received resulting in scheme members not understanding or appreciating their benefits.

5.00	APPENDICES
5.01	<p>Appendix 1 – Engagement Statement</p> <p>Appendix 2 – draft Communications Strategy</p>

6.00	LIST OF ACCESSIBLE BACKGROUND DOCUMENTS
6.01	<p>Existing Clwyd Pension Fund Communications Strategy - https://mss.clwydpensionfund.org.uk/documents/Communication%20Strategies%20September%202019.pdf</p> <p>Contact Officer: Karen Williams, Pension Administration Manager Telephone: 01352 702963 E-mail: karen.williams@flintshire.gov.uk</p>

7.00	GLOSSARY OF TERMS
7.01	<p>(a) CPF – Clwyd Pension Fund – The Pension Fund managed by Flintshire County Council for local authority employees in the region and employees of other employers with links to local government in the region.</p> <p>(b) Administering authority or scheme manager – Flintshire County Council is the administering authority and scheme manager for the Clwyd Pension Fund, which means it is responsible for the management and stewardship of the Fund.</p> <p>(c) Committee or PFC – Clwyd Pension Fund Committee - the Flintshire County Council committee responsible for the majority of decisions relating to the management of the Clwyd Pension Fund.</p> <p>(d) Board, LPB or PB – Local Pension Board or Pension Board – each LGPS Fund has an LPB. Their purpose is to assist the administering</p>

authority in ensuring compliance with the scheme regulations, TPR requirements and efficient and effective governance and administration of the Fund.

- (e) **LGPS – Local Government Pension Scheme** – the national scheme, which Clwyd Pension Fund is part of.
- (f) **SAB – The national Scheme Advisory Board** – the national body responsible for providing direction and advice to LGPS administering authorities and to DLUHC.
- (g) **DLUHC – Department of Levelling Up, Housing and Communities** – the government department responsible for the LGPS legislation
- (h) **TPR – The Pensions Regulator** – TPR has responsibilities to protect UK's workplace pensions and make sure employers, scheme managers and pension specialists can fulfil their duties to scheme members. This includes oversight of public service pension schemes, including the LGPS. Specific areas of oversight are set out in legislation and also expanded on within TPR's Guidance and Codes of Practice.