Cronfa Bensiynau Clwyd Clwyd Pension Fund



Flintshire County Council
Administering Authority for Clwyd Pension Fund

Communications Strategy June 2022



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Introduction

This is the Communication Strategy for the Clwyd Pension Fund administered by Flintshire County Council (the Administering Authority). It has been prepared to meet the requirements of the LGPS Regulations as set out in Appendix 1, and outlines our strategic approach to communications.

Stakeholders of the Fund

The Fund's key stakeholders are:

- our 52 employers within the Flintshire, Denbighshire and Wrexham Council areas
- our 49,000 scheme members split into the categories below as at 1 April 2021:

Active scheme members	17,700
Deferred scheme members	16,900
Pensioner and dependant members	14,400

This Strategy principally focuses on how we communicate with current and prospective scheme members and employers. However, this Strategy covers all our communications including other stakeholders with whom we communicate:

- Pension Fund staff (see Appendix 2)
- Pension Fund Committee and Pension Board members, and Advisory Panel (see Appendix 3)
- Other interested organisations including Government Departments, Scheme Advisory Board and Advisors to the Pension Fund (see Appendix 4).

Mission Statement

The Clwyd Pension Fund Mission Statement is:

- to be known as forward thinking, responsive, inclusive, proactive and professional, providing excellent customer focused, reputable, and credible service to all customers.
- to have instilled a corporate culture of risk awareness, financial governance, and to provide the highest quality, distinctive services within the resource budget.
- to work effectively with partners, being solution focused with a 'can do' approach.

Aims and objectives

Our **overriding objectives** in relation to communications are to:

- Increase awareness and understanding of the Scheme and provide sufficient information so stakeholders can make informed decisions.
- 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.

In relation to **member communication**, we want our engagement activities to:

- Increase awareness and understanding of the benefits of the pension scheme and how it works.
- Encourage members to take ownership of their pension and understand the broader benefits of the pension scheme.
- Maintain and build positive member experiences along every member's journey, wherever they are on their journey.
- Reduce the need for face-to-face meetings and phone calls.

Our key scheme member communications are explained later in this Strategy.

In relation to **employer communication**, we want our engagement activities to:

- Increase awareness and understanding of the information required by the Fund from employers.
- Encourage employers to take ownership of the data and help their employees understand the broader benefits of the pension scheme.
- Maintain and build positive relationships with employers regardless of size or pensions expertise.
- Make the management of the Fund more efficient for both the Fund and employers.

Our key employer communications are explained later in this Strategy.

How we communicate

We are committed to ensuring communications are accessible to all stakeholders and developing further use of digital communications.

We make sure that communications are **easy to understand** through use of plain language techniques and readability scores.

All generic scheme member communications are published in both English and Welsh languages at the same time.

We comply with accessibility standards for both content and visuals, including for vulnerable customers. Before issuing communications, all requirements are considered, such as:

- Ensure video content includes subtitles as standard.
- Ensure members are aware that we can meet any requirements for:
 - Braille formats;
 - Plain text for best results with screen readers;
 - Audio CDs;
 - Translated versions.
- Ensure the website and/or app is fully consistent with Web Content Accessibility Guidelines.

Implementation

The aims and objectives outlined in this Strategy require quite a radical shift in how we communicate with stakeholders, particularly scheme members and employers. This Strategy is being implemented at a time when **there are a number of ongoing challenges**, including:

- the need to communicate various scheme and national changes, such as the McCloud remedy, potential increases in minimum pension age and the national pensions dashboard; and
- continuing pressure on resources and budgets for employers and the administering authority.

In addition, we are mindful of the fact that all our communications must be in English and Welsh, as well as being accessible to all stakeholders.

As a result, this Strategy will be implemented over time focussing on the following key areas:

- 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.

This is considered further within our 2022/23 to 2024/25 Business Plan and will be considered further in future Business Plans. Our focus in 2022/23 will be on communications with scheme members and will involve:

- Communicating more concisely with shorter, visually compelling communications.
- Tailoring content so it is more relevant to the audience segment.
- Setting targets for online activity and increasing usage of MSS website.
- Promoting self-service.
- Using an omnichannel communications approach with a focus on allowing members to interact with the Fund in a way that suits their needs.

Our main communications with Scheme members

Item	Why is this issued?	What format is it?	When is this issued?	Who is it issued to?	Regulatory (Y/N)
Website(s)	To provide a first point of contact for all Scheme members and show basic information about the Fund and the LGPS and watch videos.	Multiple, public facing, unsecured websites: https://mss.clwydpensionfund.org.uk https://www.lgpsmember.org	Permanent	All members	Y (hosts regulatory documents)
	Members can also access or download scheme literature and forms.				
Member Self Service (MSS)	The MSS allows members to log into a secure web area to: • view personal information; • update personal details; • update death grant expressions of wish; • calculate retirement estimates; • review Annual Benefit Statements; • view newsletters and other communications; • upload information for the Fund's Administration Team. The Fund's preference is for members to do this online to reduce the burden on the Administration team.	Secure website plus email alerts.	Permanent	All members	Y (as includes Annual Benefit Statements)
Annual Benefit Statements (ABS)	The ABS gives members an annual snapshot of their own benefit situation. This helps make their pension feel relevant.	Downloadable digital statement from MSS account. Paper copies are sent to members' home addresses where they have opted for paper communications.	Annually by end of August.	All active and deferred members.	Y
Annual Pensions Increase Statements	The annual pensions increase statement provides all pensioners with information on what their pension will increase to as a result of the annual pensions increase award.	Downloadable digital statement from MSS account. Paper copies are sent to members' home addresses where they have opted for paper communications.	Annually before April pay date.	All pensioners and dependants.	Υ

Item	Why is this issued?	What format is it?	When is this issued?	Who is it issued to?	Regulatory (Y/N)
Generic Newsletters	Penpal is designed to keep active members up to date with important information such as changes to scheme rules and highlights important Facts & Figures from the Annual Report and Accounts.	Downloadable digital newsletter from MSS account. Paper copies are sent to members' home addresses where they have opted for paper communications.	Penpal with annual benefit statements.	Penpal to active members.	Y (but not all issues)
	Clwyd Catch Up aims to keep pensioners informed about how new annual rates of pension have been calculated and also includes wider pension news.	communications.	Clwyd Catch Up annually in April.	Clwyd Catch Up to pensioners and dependants.	
	Deferred Diaries is predominantly used to explain the content of deferred benefit statements, although it can include other LGPS updates too and highlights important facts and figures from the Annual Report and Accounts.		Deferred Diaries with annual benefit statements.	Deferred Diaries to deferred members.	
Update Newsletters	To notify members of urgent LGPS issues that cannot wait for another scheduled	Downloadable digital newsletter from MSS account.	As required	To any appropriate	Y (but not all issues)
(Pension Extra)	communication.	Paper copies are sent to members' home addresses where they have opted for paper communications.		members.	
Pension	To educate members.	Presentations and workshops, some in	Year round	Active members	N
Presentations/ Workshops	To promote relevant LGPS literature and services, ranging from MSS to death grant expression of wish forms.	person and others online based on audience requirements.			
Telephone and	To answer specific member queries in detail.	Telephone, fax or email:	Year round	All members,	N
email / Open Office		pensions@flintshire.gov.uk		member representatives	
Policy		Upload questions and information to MSS.		and prospective	
		Also in person appointments.		members.	
Pre-Retirement Courses (in partnership with Gwynedd Pension Fund)	To inform about Local Government retirement benefits and procedures.	Face to face or virtual courses.	Year round	All North Wales LGPS members approaching retirement.	N

Item	Why is this issued?	What format is it?	When is this issued?	Who is it issued to?	Regulatory (Y/N)
A Short Scheme Guide Government Pension Sc joiners. A retirement pack sent t to retire. Fact-sheets on numerou ill-health retirement, mat	Fund-related literature includes:	items like the retirement pack are sent directly to members).	Permanent (or issued to members when required)	All members	Y (but not all)
	A Short Scheme Guide to the Local Government Pension Scheme for new joiners.				
	A retirement pack sent to all members about to retire.				
	Fact-sheets on numerous areas including ill-health retirement, maternity leave, flexible retirement and commutation.				
Correspondence	To help members who may be affected or at risk of being affected by the Lifetime or Annual Allowance to understand their obligations.	Personal letters Workshops	Annually when required	Affected and at risk members	Y (but not all)
		Factsheets	Permanent		
Annual Report and Accounts	The Annual Report and Accounts is published to highlight how the Fund has performed during the previous financial year.	PDF hosted on the website.	Annually in November	All members	Υ
	It also includes statements with regards to administration, governance, investment principles, funding strategy, and risk.				

Our main communications with Employers

Item	Why is this issued?	What format is it?	When is this issued?	Who is it issued to?
Administration Strategy	The Fund's Administration Strategy sets out in detail the obligations and responsibilities of both the Fund	PDF on the website. Email to all employers.	Permanent, updated every three years.	All employers
	and the employers to achieve set performance standards and legal requirements. It provides an overview of how the administering authority and employers will work together to achieve a high-quality service.		When updated, on joining for new employers and new employer contacts.	
Employer key contact officers and meetings	Meeting(s) to discuss any issues relating to the LGPS and/or raise any issues around the performance of the employer or services provided by the Fund.	A meeting between the Principal Pensions Officer and the Employer's key contact officer.	As required	Employer's key contact officer
Annual Employer Meeting	To provide administration related updates and address the current issues and upcoming changes to the Clwyd Pension Fund and the LGPS.	Meeting	Annually when required	All employers
Annual Joint	To provide an overview of fund performance and	Meeting	Annually	All employers,
Consultative Meeting (AJCM)	keep attendees up-to-date with LGPS changes and matters affecting the Fund, covering all areas of governance, administration, investments and funding.	Usually includes presentations summarising the main aspects of the Fund's Annual Report and Accounts.		Trade Union representatives and other scheme member representatives.
Training Sessions	To bring relevant employer contacts up-to-date with LGPS regulations and administration procedures.	Training session	As required	All employers
Website	To provide information and guidance on how to	Websites:	Permanent	All employers
	implement LGPS regulations and manage the Clwyd Pension Fund.	https://mss.clwydpensionfund.org.uk including a dedicated employer section: https://mss.clwydpensionfund.org.uk/home/ employers/index.html https://www.lgpsregs.org/		

Item	Why is this issued?	What format is it?	When is this issued?	Who is it issued to?
Email Updates	To highlight important Fund matters, general updates about the LGPS and the services available to the Fund's employers and their staff.	Email	As required	All employers
	The Fund emails employers to inform them when a news alert is added to the website.			
i-Connect	To pass secure scheme member data between employers and the Fund.	i-Connect system	Permanent	All employers
	i-Connect is the software that all employers in the Fund must use to submit information to the Pension Administration Section.			
Employer specific events	To assist employers in understanding their responsibilities.	Face-to-face or virtual events arranged by employers, attended by Fund officer(s) on request by the employer.	As required	All employers

Monitoring

As the delivery of this Strategy evolves we want to ensure we are meeting its objectives. We will do this by monitoring progress as shown below.

Objective/Measure	Monitoring	Specific targets
Increase awareness and understanding of the Scheme/Fund and how it works.	Feedback through annual member and employer surveys and listening groups Collate informal feedback when any communication is sent out.	Surveys – 90% positive responses.
	Monitor compliments and complaints from member and employer emails and calls to the Fund.	
Maintain and build positive member experiences/employer relationships.	Feedback through annual member- and employer-specific survey and listening groups – target 90% positive responses.	
	Monitor compliments and complaints from member emails and calls to the Fund.	
Ensure we use the most appropriate means of taking into account the different needs of different stakeholders.	Feedback through annual member- and employer-specific survey and listening groups.	-
Encourage members/employers to take ownership of their pension/information required.	Track video and podcast usage. Track take-up of MSS (members).	Video, podcast, online communication and website usage – ongoing increases.
	Track click throughs of all online communication. Monitor website usage.	MSS take up – 5% per year increases in the proportion of registered members with a long-term target of 75% of all active and deferred members being registered users.
Reduce the need for face to face meetings and phone calls by scheme members.	Track member calls and face to face meetings.	Ongoing decreases.
Make the management of the Fund more	Monitor the workload of the Administration Team relating to ad hoc enquiries.	Ad hoc enquiries, emails, calls and face to
efficient for both the Fund and employers.	Track employer and member emails and calls, and face to face meetings.	face meetings – ongoing decreases.
Look for efficiencies and environmentally responsible ways in delivering communications through greater use of technology and partnership working.	Track take-up of MSS (members).	MSS take up – 5% per year increases in the proportion of registered members with
	Ensure mandatory use of i-Connect by all employers.	a long-term target of 75% of all active and
	Track click throughs of all online communication.	deferred members being registered users.
		i-Connect take up – 100% of employers.
Regularly evaluate the effectiveness of communications and shape future communications appropriately.	Regularly reviewing communications plan and strategy based on monitoring mentioned above.	

Key Risks

The key risks to the delivery of this Strategy are outlined below. We will monitor these and consider 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 an up to date and accurate employer database leading to information not being sent to correct person.
- Communications to scheme members not being received or read.
- Lack of clear and understandable communication to employers, scheme members and other stakeholders.

Approval and review

This version of the Communications Strategy was approved at the Clwyd Pension Fund Committee on 15 June 2022. It will be formally reviewed and updated at least every three years or sooner if any matters included within it merit reconsideration.

Further information

Any enquiries in relation to the Fund's communications or the principles or content of this Strategy Statement should be sent to:

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Appendix 1 – Regulatory framework

The strategy has been produced in accordance with regulation 61 of the Local Government Pension Scheme (Administration) Regulations 2013. The regulation requires that:

- **1.** An administering authority must prepare, maintain and publish a written statement setting out its policy concerning communications with:
 - a) Scheme members (active, deferred, retired and dependant)
 - b) representatives of Scheme members
 - c) prospective Scheme members
 - d) Scheme employers
- 2. In particular the statement must set out its policy on:
 - a) the provision of information and publicity about the scheme
 - b) the format, frequency and method of distributing such information or publicity
 - c) the promotion of the Scheme to prospective Scheme members and their employers.
- **3.** The strategy must be revised and published by the administering authority following a material change in their policy on any matters referred to in paragraph (2).

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 Local Government Pension Scheme Regulations). The Clwyd Pension Fund aims to adhere with all such legislation and related statutory or best practice guidance. This includes the Pension Regulator's Code of Practice for Public Service Pension Schemes.

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

Appendix 2 – Communicating with Pension Fund staff

The Fund recognises that its staff are its greatest resource and ensures that they are kept informed about the Fund's aims to deliver a quality and accurate service.

The following key personnel are all are available for any of the Fund staff who may want a one-to-one with them:

Head of Clwyd Pension Fund

Deputy Head of Clwyd Pension Fund

Pensions Administration Manager

Staff also have unrestricted access to their supervisors and senior colleagues to discuss and resolve work related issues. Staff are kept informed with:

Communication	Purpose
Administration Section Meetings	Normally held on a monthly basis to discuss operational and technical issues, ensuring there is a shared understanding of any issues and developing a consistent approach towards addressing them. In addition, the Pensions Administration Management team meet weekly.
Appraisals and Training	All new members of staff undergo an induction procedure to acquaint them with the operational running of the Fund. Subsequently, all pension staff also receive both in-house and external training. Staff at all levels in the Fund have annual assessments, with a mid-year review, during which there are open discussions of work issues and areas for development. This dialogue is supplemented by regular one-to-one meetings within team structures.
TEC (Training & Education Centre)	Clwyd Pension Fund utilises an e-learning facility. This allows Fund staff to work through these e-learning modules to enhance other learning and on-the-job training that they receive. The modules include a timeline of LGPS regulations and how to process calculations.
Team Emails	All team members can email any other team member on any matter relating to the delivery of services or other staff updates.
Finance Section Meetings	Held on a regular basis to discuss operational and technical matters relating to accounting, investment and funding aspects of the Fund's management.
Management Team Meetings	Held on at least a fortnightly basis, involving the Head of Clwyd Pension Fund, the Deputy Head of Clwyd Pension Fund and the Pensions Administration Manager. Attendees discuss any strategic or operational Fund matters, including updates on staffing, resources and other managerial aspects.

Appendix 3 – Communicating with Board members and Pension Fund Committee members

Effective communication gives the Pension Fund Committee and Pension Board members the required information to act in the best interests of the Fund members and employers. The key communication methods, messages and objectives are:

Communication	Purpose
Committee/Board reports	To help Committee and Board members understand the matter to be discussed at the meeting and build their knowledge so they can best serve scheme members when carrying out their role. These reports will include all the Fund's key strategies and other documents such as the Fund's business plan and Annual Report and Accounts.
Committee/Board meetings	Where all decisions will be made and matters considered, providing Committee and Board members with an opportunity to ask questions about any of the matters being considered. Meetings regularly include presentations from officers and advisers to help explain the matters being considered.
Committee/Board minutes	Captures all key points in the meeting including conclusions and decisions, providing a formal record for future reference.
Pre Committee e-mail briefing from Head of Clwyd Pension Fund	To provide Committee and Board members with an overview of the forthcoming meeting and help them understand the key matters that will be considered.
Regular training and briefing sessions	To help Committee and Board members meet expected levels of knowledge and better understand Fund matters, including upcoming Committee/Board agenda items. Committee and Board members are also given access to external training events and conferences relevant to their roles.
General emails	Usually sent by the Fund's management, email will be used to provide general updates on Fund matters, training and other events.
External website – Clwyd Pension Fund and LGPS	Committee and Board members will find useful information about the Fund and the Scheme on these websites:
	https://mss.clwydpensionfund.org.uk
	https://www.lgpsmember.org

Communication	Purpose
External website – Flintshire County Council	The majority of reports provided to Pension Fund Committee members, together with the meeting minutes, are available on the Council's website:
	Committee minutes - English
	Committee minutes - Welsh
	The Committee papers also include the minutes from the latest Pension Board meeting.
Annual Joint Consultative Meeting (AJCM)	Committee and Board members are invited to this annual meeting which provides an overview of fund performance and keep attendees up-to-date with LGPS changes and matters affecting the Fund, covering all areas of governance, administration, investments and funding.

Appendix 4 – Communicating with other bodies

The Fund engages proactively with a number of other bodies. These include:

The Fund has regular contact with DLUHC as a responsible LGPS Fund, participating and responding to consultations, as required.
The LGA liaises with LGPS funds and DLUHC to ensure that all LGPS regulations are administered correctly as per DLUHC's instructions.
The national SAB was established following the Public Services Pensions Act 2013. It provides advice to the LGPS funds and Local Pension Boards in relation to the effective and efficient administration and management of the Scheme. We therefore liaise with the SAB as appropriate.
The Pensions Regulator publishes Codes of Practice and guidance, some of which are relevant to the Public Sector. The Regulator also overseas how pensions schemes are adhering to some legal requirements. The Fund liaises with the Regulator as required to provide information relating to matters of interest to the Regulator.
The Fund works with relevant trade unions to ensure the Scheme is understood by all interested parties. Efforts are made to ensure all pension related issues are communicated effectively with the trade unions. The trade unions are represented on the Pension Fund Committee and Pension Board.
The Fund communicates with relevant employer representative bodies to ensure that the Fund's views are represented to employer groups. Employers are represented on the Pension Fund Committee and Pension Board.
The Fund has appointed Additional Voluntary Contributions (AVC) providers for Clwyd Pension Fund members to pay additional contributions too. These AVCs are held and invested separately from the main Clwyd Pension Fund. The Fund's current AVC providers are Prudential and Utmost (closed to new contributions).

Pension Fund Investment Managers, Advisers and Actuaries	The Head of Clwyd Pension Fund, Deputy Head of Fund, Finance team and Administration Team have regular meetings with;
	 the Fund Managers who invest funds on behalf of the Fund
	 Investment Advisers 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 Independent Adviser who provides help and advice on governance matters.
	The Independent Adviser, the Fund Actuary and the Investment Adviser are all members of the Pension Fund Advisory Panel, and attend all Pension Fund Committee meetings. The Independent Adviser is also the Chair of the Pension Board and attends all Board meetings.
Welsh Government	The Fund sometimes needs to liaise with Welsh Government on matters that might impact the delivery of the LGPS.
Wales Pension Partnership (WPP)	The Fund is a member of the Wales Pensions Partnership which has appointed an Operator to invest assets for all Wales LGPS funds. Some of the administration and management of the partnership is carried out by the Host Authority, Carmarthenshire Council. The Fund is represented on the WPP Joint Governance Committee by the Chair of the Pension Fund Committee and on the Officer Working Group by an Officer determined by the Pension Fund Committee. As a result of this the Fund will have ongoing relationships with a number of LGPS Funds and organisations within this and other asset pools. Regular reports on the performance of and decisions made by the poolare presented at Committee meetings and to members via the Fund's Annual Report and Accounts.
Pension Fund Custodian	The Fund's Custodian ensures the safekeeping of the Fund's investment transactions and all related share certificates where not invested with the Wales Pensions Partnership.
Pensions and Lifetime Savings Association (PLSA)	The Fund is a member of PLSA, which provides an opportunity for LGPS administering authorities and pension scheme managers to discuss issues of common interest and share best practice. The Head of Clwyd Pension Fund is a representative on the PLSA Local Authority Committee.

Class User Group	The Pension Administration Manager and other Pensions Officers attend the Class User Group meetings twice a year to discuss software issues and required upgrades to Altair, the Fund's administration system. This also includes additional user groups for i-Connect and Member Self Service.
Local Authority Pension Fund Forum (LAPFF)	The Fund is a member of LAPFF which was established to help local authority Funds share information and ideas about socially responsible investing.
Regional Forums	The Shrewsbury Pension Officers Group takes place quarterly. It is an opportunity for the Pensions Administration Managers, and other Pension Officers from LGPS Funds in the region, to share information and ensure uniform interpretation of the LGPS, and other prevailing regulations.
Partnership Manager Meetings with the eight Pension Funds in Wales	The Pensions Administration Manager, Deputy Head of Clwyd Pension Fund and other Pension Officers regularly meet representatives from the other LGPS Pension Funds in Wales to discuss best practice, to ensure that all Welsh Funds have a consistent approach to their administration, finance and other Fund procedures where appropriate.
Welsh Communications Group with the eight Pension Funds in Wales	All of the Communication Officers from the Welsh Pension Funds meet as and when required to share ideas about methods of communication.
Shared Services Communications Group	The Communications Officer and other Pension Officers attend a regional Communication Group on a quarterly basis, to ensure continuity and share ideas about methods of communication.
Requests for information	Requests for information either under the Freedom of Information Act or otherwise, will be dealt with as openly and swiftly as allowed, providing that such information does not breach confidentiality, by Pension Officers working with the Flintshire County Council Freedom of Information Officer.
Consultations	There are occasions when the Fund will consult with interested parties either as a result of potential changes to the regulations governing the LGPS or specific policy changes relating to the Fund. In these instances, the most effective way of communicating with interested parties is to hold a period of consultation, during which they are given the opportunity to respond to specific changes.
Press releases and comments	Press releases or comments regarding the Clwyd Pension Fund are made either via the Corporate Communications team within Flintshire County Council or in collaboration with them.