

Communications Policy Statement

London Borough of Harrow Pension Fund

March 2017

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Introduction

This is the Communications Policy Statement of the London Borough of Harrow Pension Fund, administered by Harrow Council, the Administering Authority.

The Fund liaises with a number of employers, namely:-

- Alexandra School
- Avanti House Free School
- Aylward Primary School
- Bentley Wood School
- Canons High School
- Carillion Services
- Engie
- Govindas
- Harrow College
- Harrow High School
- Hatch End School
- Heathland and Whitefriars School
- Krishna Avanti Primary School
- Linbrook Services
- North London Collegiate School
- Nower Hill High School
- Park High School
- Pinner High School
- Rooks Heath College
- Salvatorian College
- St Bernadette's Catholic School
- St. Dominic's College
- St Jerome School
- Sopria Steria
- Stanmore College
- The Jubilee Academy
- Wates

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And, at 31 March 2016 the Fund had 17,699 scheme members (5,561 active members, 6,700 deferred members and 5,438 pensioner members). The delivery of the benefits payable under the Local Government Pension Scheme involves communication with a number of interested parties. This Statement provides an overview of how we communicate and how we measure whether our communications are successful.

It is effective from 1 April 2017.

Any enquiries in relation to this Statement should be sent to:

Lesley Freebody

Team Leader
Pensions Team

Harrow Council
3rd Floor, South Wing
Civic Centre
Station Road
Harrow
HA1 2XF

telephone: 0208 416 8087

email: Lesley.freebody@harrow.gov.uk

Regulatory Framework

This Statement is required by the provisions of Regulation 61 of the Local Government Pension Scheme Regulations 2013. The provisions require the Council as the Administering Authority to:

“...prepare, maintain and publish a written statement setting out its policy concerning communications with:

- (a) members.*
- (b) representatives of members.*
- (c) prospective members and*
- (d) Scheme employers.”*

In addition it specifies that the statement must include information relating to:

“(a) the provision of information and publicity about the Scheme to members, representatives of members and Scheme employers;

(b) the format, frequency and method of distributing such information or publicity; and

(c) the promotion of the Scheme to prospective members and their employers.”

As a provider of an occupational pension scheme, the Council is already obliged to satisfy the requirements of the Occupational Pension Schemes (Disclosure of information) Regulations and other relevant legislation, for example the Pensions Act 2014. The Regulations are supported by a Code of Practice. While the Code itself is not a statement of the law, and no penalties can be levied for failure to comply with it, the Courts or a tribunal must take account of it when determining if any legal requirements have not been met. A summary of our expected timescales for meeting the various disclosure of information requirements are set out in the Performance Measurement section of this document.

Responsibilities and Resources

Communications material is provided through the Pensions Team and validated through the Communications Unit. The Team write all internally produced communications including information published on the internet/intranet. The Team is also responsible for arranging all forums and meetings covered within this Statement. The Team report through the Council's management structure with ultimate responsibility for ensuring compliance with the Regulations resting with the Corporate Director – Resources and Commercial.

Printing documentation is carried out internally.

Communication with key audience groups

Our audience

The Pensions Team communicates with a number of stakeholders on an on-going basis. For the purpose of this Statement, the Team engages with the following audience groups:

- active members;
- deferred members;
- pensioner members;
- prospective members;
- scheme employers;
- union representatives;
- Elected Members;
- Pension Board;
- Pensions Team staff;
- local taxpayers and residents;
- other stakeholders / interested parties

In addition there are a number of other stakeholders with whom the Council communicates on a regular basis including Her Majesty's Revenue and Customs (HMRC), Department for Communities and Local Government (DCLG), Department of Works and Pensions (DWP), Pensions Advisory Service, solicitors, actuaries and other pension providers. The Council has also considered, as part of this policy, how it communicates/engages with these interested parties.

How we communicate

General communication

The Council has put in place a number of initiatives that will assist in moving towards the Government's e-gov agenda. However, pensions information, for the most part, is still delivered through paper based communications. The Council has developed alternative communications media (e.g. documents in Braille and large print, audio tapes, etc) to ensure that it caters for the needs of special groups. Additionally the Team utilises the Council's internet/intranet facilities and is developing both email and internet self-service facilities that will enable a gradual move away from paper communications and reduce communication costs.

Within the Pensions Team staff are responsible for all administration of the Local Government Pension Scheme. Any member of staff within the Team can deal with general telephone calls, written correspondence or visitors. Communications on more complicated pensions issues are managed amongst the senior management.

Telephone calls are either routed through a dedicated direct dial number or, alternatively, through main Harrow contact centre and then onwards to one of the Pension Team's extensions.

Branding

As the Pension Fund is administered by Harrow Council, all literature and communications conform to the Council's branding policy.

Accessibility

The Council serves a culturally rich and diverse client base and is conscious of the fact that access to information requires varied forms of communication. Any material required in an alternative format or language is managed in line with a specific request. All publications include details of how a request for alternative communication format can be requested.

Policy on Communication with Active, Deferred and Pensioner Members

Our objectives with regard to communication with members as groups are:

- to facilitate the LGPS to be used as a tool in the recruitment and retention of employees, thereby assisting both the Council and associated bodies in becoming employers of choice.
- to educate and explain to members the benefits of the LGPS.
- to provide the diverse client base with increased opportunity to engage on pension related matters through the most appropriate medium.
- as a result of improved communication, for enquires and complaints to be resolved at the earliest opportunity and to the client's satisfaction.
- in line with the Government's agenda in relation to individuals making adequate financial arrangements for retirement, increase take up of LGPS membership.
- to ensure that all relevant stakeholders have sufficient material to hand to inform pension-related judgements.

In addition, as required, appropriate communications with individual members covering their own particular circumstances are arranged.

Our objectives are met by providing the following communications:

| Method of communication | Media | Frequency of issue | Method of distribution | Audience group (active, deferred or pensioner members or all members) |
|---|--|---|---|--|
| Scheme Guide | Paper based and through Harrow's internet/intranet | At joining and at the time of major scheme changes | Post to home address, via scheme employers and online | Active members |
| Newsletters | Paper based and through Harrow's internet/intranet | Annually and ad hoc to ensure timely notification of major scheme changes | Post to home address and online | Separately for active, deferred and pensioner members |
| Pension Fund Annual Report and Financial Statements | Paper based and through Harrow's internet/intranet | Annually | Hard copy on request and online | All members |

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| | | | | |
|---|--|-----------------------------------|---------------------------------|-----------------------------|
| Pension Fund Financial Statements Summary | Paper based and through Harrow's internet/intranet | Annually | Post to home address and online | All members |
| Annual Benefit Statements | Paper based | Annually | Post to home address | Active and deferred members |
| Fact sheets | Paper based and through Harrow's internet/intranet | Topic specific information sheets | Post to home address and online | Active and deferred members |
| Website – Harrow Intranet | Electronic | Continually available | Loaded for key communications | All members |
| One to one education sessions | Personal interview | On request | As requested | All members |

Explanation of communications

Scheme Guide - A booklet providing a relatively detailed overview of the LGPS, including who can join, how much it costs, the retirement and death benefits and how to increase the value of benefits.

Newsletters – Mainly an annual newsletter which provides updates in relation to changes to the LGPS as well as other related news, such as European / UK pension matters, payroll pay dates/deadlines, a summary of the accounts for the year, contact details, etc.

Pension Fund Annual Report and Financial Statements – Details of the value of the Pension Fund at the end of the financial year, income and expenditure during the year as well as other related details, (e.g. current employer bodies and scheme membership numbers. This is a somewhat detailed and lengthy document and, therefore, it will not be routinely distributed except on request. A summary document, as detailed below, will be distributed.

Pension Fund Financial Statements Summary – A handy summary of the position of the Pension Fund at the end of the financial year, income and expenditure during the year as well as other related details.

Annual Benefit Statements – For active members these include the current value of benefits to 31 March as well as the projected benefits at Normal Pension Age. The associated death benefits are also shown as well as details of any individuals the member has nominated to receive the lump sum death grant. For deferred members, the benefit statement includes the current value of the deferred benefits and the earliest payment date of the benefits as well as the associated death benefits.

Fact sheets – These are leaflets that provide some detail in relation to specific topics, such as topping up pension rights, death benefits and pension rights on divorce etc.

Harrow Intranet – The intranet provides scheme specific information, forms that can be printed or downloaded, access to documents (e.g. newsletters and Annual Report), frequently asked questions and answers, links to related sites and contact information.

One to one education sessions – These sessions offer the individual a confidential interview with a member of the team.

Policy on Communication with Prospective Members and their Employing Bodies

Our objectives with regard to communication with prospective members are:

- to facilitate the LGPS to be used as a tool in the recruitment and retention of employees, thereby assisting both the Council and associated bodies in becoming employers of choice.
- to educate and explain to members the benefits of the LGPS.
- to provide the diverse prospective client base with increased opportunity to engage on pension related matters through the most appropriate medium.
- in line with the Government’s agenda in relation to individuals making adequate financial arrangements for retirement, increase take up of LGPS membership.
- to ensure that prospective members have sufficient material to hand to inform pension-related judgements.

The Pensions Team do not have immediate access to prospective members but the benefits of a defined benefits scheme are referenced in job vacancy advertisements. Promotional material and educational visits are provided for employing bodies.

Our objectives are met by providing the following communications:

| <i>Method of Communication</i> | <i>Media</i> | <i>Frequency of Issue</i> | <i>Method of Distribution</i> | <i>Audience Group</i> |
|---------------------------------------|---------------------------|----------------------------------|--------------------------------------|------------------------------|
| Overview of the LGPS - Guide | Paper based, and Internet | On commencing employment | Starter pack | New employees |

Explanation of communications

Overview of the LGPS – Guide - A brief guide that summarises the costs of joining the LGPS and the benefits of doing so. All this information is available on Harrow’s Pension Fund internet pages.

Policy on Communication with Employing Bodies

Our objectives with regard to communication with employers are:

- to establish sound working arrangements to assist with a free flow of relevant information.
- given the costs associated with funding a defined benefits scheme, to provide the employing bodies with sufficient information to assist them in their planning for future employer contribution rates.
- to provide an infrastructure that will assist in maintaining an accurate database.
- to provide literature and processes around starters, changes during employment, leavers and retirees thereby ensuring smooth data transfers in relation to all staffing issues.
- to ensure that each employing body understands the benefits of being an LGPS employer.
- to assist the employing body in the development of its discretionary policies.

Our objectives are met by providing the following communications:

| <i>Method of Communication</i> | <i>Media</i> | <i>Frequency of issue</i> | <i>Method of Distribution</i> | <i>Audience Group</i> |
|---|--|--|--|--------------------------------|
| Employers Guide | Paper based and electronic file format | At joining and updated as necessary | Post , email and data storage medium | Main contact for all employers |
| Employers meeting | Meeting with key employing body personnel | Triennially | Meeting | Employing body management |
| Pension Fund Annual Report and Financial Statements | Paper based and through Harrow's intranet/internet | Annually | Internet | Employing body |
| FRS102 report | Electronic file format. | Annually | Data storage medium. | Employing body. |
| Service Level Agreement | Paper based and electronic file format. | Start of admission agreement and revised at Contract renewal | Hard copy post and data storage medium | Admitted body |

Explanation of communications

Employers Guide - A detailed publication that provides guidance on the employer's duties and responsibilities. It assists an employer in ensuring that it meets its statutory obligations within the prescribed timescales (e.g. publication of policy on discretions).

Employers Meeting – A formal seminar style event where the Pensions Team provide an update on the triennial actuarial valuation.

Pension Fund Annual Report and Financial Statements – Details of the value of the Pension Fund at the end of the financial year, income and expenditure during the year as well as other related details, (e.g. current employer bodies and scheme membership numbers. This is a somewhat detailed and lengthy document and, therefore, it will not be routinely distributed except on request. A summary document, as detailed below, will be distributed.

FRS102 Report – This is a national accounting standard that all authorities administering pension funds must follow. FRS102 requires an organisation to account for retirement benefits when it is committed to provide them, even if the actual provision will well in the future.

Service Level Agreement – A document that sets out, alongside the admission agreement, the duties and responsibilities of the Council and the employing body for the duration of the service contract.

Policy on communication with Union Representatives

Our objectives with regard to communication with union representatives are:

- to foster close working relationships in communicating the benefits of the Scheme to union members
- to ensure the unions are aware of the Pension Fund's policy in relation to any decisions that need to be taken concerning the Scheme
- to engage in discussions over the future of the Scheme and to ensure that Union representatives have sufficient knowledge and opportunity to respond on all DCLG and HMRC consultations
- to harness union communications in a joint venture to explain the benefits of the LGPS to prospective and current members
- to liaise with unions and provide assistance in supporting union officers in their learning and understanding of the LGPS

Our objectives are met by providing the following communications:

| <i>Method of communication</i> | <i>Media</i> | <i>Frequency of Issue</i> | <i>Method of Distribution</i> | <i>Audience Group</i> |
|-------------------------------------|----------------------------|--|---|---|
| Consultation on strategy statements | Paper based and electronic | As and when required | Email or hard copy | Union observers on Pension Fund committee |
| Education sessions | Paper based and electronic | On request | Various | Union representatives |
| Pension Fund Committee meetings | Reports and meetings | In line with published Committee meeting cycle | Notification through Committee Services | Named union observers |

Explanation of communications

Consultation papers– documents dealing with key issues and developments relating to the LGPS and the Fund.

Education sessions – sessions that are available on request for union representatives, [e.g. to improve their understanding of the basic principles of the scheme or to explain possible changes to policies]

Pension Fund Committee meetings – formal meetings of Elected Members, attended by Council senior officers, investment managers, invited pensions specialists and union members.

Policy on communication with Elected Members

Our objectives with regard to communication with Elected Members are:

- to ensure that Elected Members receive sufficient reports, briefings and training to allow them to carry out their statutory duties and responsibilities in line with LGPS legislation.
- to seek Elected Member approval to the development or amendment of discretionary policies,
- to seek Elected Members approval to formal responses to government consultation in relation to the scheme

Our objectives are met by providing the following communications:

| Method of Communication | Media | Frequency of Issue | Method of Distribution | Audience Group |
|---------------------------------|----------------------------|---|-------------------------------|--|
| Training sessions | Pension seminars | Following member elections or in a timely manner briefings to ensure Elected Members are aware all relevant aspects of the Scheme | LGPS specific seminars | All Elected Members but specifically the Pension Fund Committee. |
| Briefing papers | Paper based and electronic | As and when required | Email or hard copy | All Elected Members but specifically the Pension Fund Committee |
| Pension Fund Committee Meetings | Meeting | In line with the published Committee cycle. | Email or hard copy | All members of the Pension Fund Committee |
| Report and verbal briefing | Meeting | As and when required | Report and verbal briefing | All Elected Members but specifically the Pension Fund Committee |

Explanation of communications

Training Sessions – providing a broad overview of the main provisions of the LGPS, and Elected Member’s key duties and responsibilities.

Briefing papers – briefings highlight key issues and developments in the LGPS.

Pension Fund Committee Meetings – reports submitted to the Committee.

Report and Verbal Briefing – occasions when Members require briefing on forthcoming pension changes that could impact on Corporate Priorities or have significant budget implications.

Policy on communication with Pension Board

Our objective with regard to communication with the Pension Board is:

- to ensure that the Board members receive sufficient reports, briefings and training to allow them to carry out their statutory duties and responsibilities in line with LGPS legislation.

Our objective is met by providing the following communications:

| Method of Communication | Media | Frequency of Issue | Method of Distribution | Audience Group |
|--------------------------------|----------------------------|--|-------------------------------|-----------------------|
| Training sessions | Pension seminars | Following the appointment / election of members of the Board or in a timely manner to ensure they are aware all relevant aspects of the Scheme | LGPS specific seminars | All Board Members. |
| Briefing papers | Paper based and electronic | As and when required | Email or hard copy | All Board members |
| Pension Board Meetings | Meeting | In line with the published Committee cycle. | Email or hard copy | All Board members |

Explanation of communications

Training Sessions – providing a broad overview of the main provisions of the LGPS, and the Board’s key duties and responsibilities.

Briefing papers – a briefing that highlights key issues and developments to the LGPS.

Pension Board Meetings – reports submitted to the Board.

Policy on communication with Pensions Team

Our objectives with regard to communication with Pensions Team staff are:

- to ensure they are aware of changes and proposed changes to the LGPS scheme.
- to provide new and established staff with access to both internal and external training
- through a combination of utilising task management and re-engineering service processes to monitor and develop potential for service improvements; readjusting performance measures and targets, where appropriate

Our objectives are met by providing the following communications:

| <i>Method of Communication</i> | <i>Media</i> | <i>Frequency of Issue</i> | <i>Method of Distribution</i> | <i>Audience Group</i> |
|--|-------------------------|---|--------------------------------------|------------------------------|
| Identify training/development needs as part of Appraisal | Appraisal documentation | Annual exercise, reviewed at 6 months. Informal bi-monthly meetings | Appraisal process | All Pensions Team staff |
| Staff meetings | Informal briefings | As and when required | By arrangement | All Pensions Team staff |
| Attendance at external courses | Externally provided | As and when required | By email, paper based | All Pensions Team staff |

Explanation of communications

Appraisal – Formal staff review process where future training/development needs are identified in relation to the Team’s strategic priorities.

Staff meetings - Informal training sessions which provide new and established staff with timely update on changes to pensions legislation or processes

Attendance at external courses – to provide more tailored training where it is cost-effective to use external trainers

Policy on communication with tax payers and residents

Our objective with regard to communication with tax payers is:

- to provide key information in a timely manner, ensuring full compliance with the requirements of the Data Protection and Freedom of Information Acts.

Our objectives will be met by providing the following communications:

| <i>Method of Communication</i> | <i>Media</i> | <i>Frequency of Issue</i> | <i>Method of Distribution</i> | <i>Audience Group</i> |
|--|---------------------|---|--------------------------------------|-------------------------------------|
| Reports/written response/electronic postings | Various | Reports published annually and when otherwise required in relation to general enquiries | Various | All Harrow tax payers and residents |

Explanation of communications

Reports/written response/electronic postings – Annual reports are published either through established communications (e.g. newsletters) or posted on the Council's Pension Fund internet site. Other ad hoc requests are responded to in light of the specific information requested utilising the most appropriate communications medium.

Policy on communication with other stakeholders / interested parties

Our objectives with regard to communication with other stakeholder/interested parties are:

- to meet our statutory obligations in relation to notifications and consultations
- to ensure the proper administration of the Scheme
- to deal with the resolution of pension disputes
- to administer the Fund's Additional Voluntary Contribution schemes

Our objectives will be met by providing the following communications:

| Method of Communication | Media | Frequency of Issue | Method of Distribution | Audience Group |
|---|--------------------------------|--|-------------------------------|---|
| Pension Fund Valuation reports <ul style="list-style-type: none"> • Rates and Adjustment Certificate • Revised Rates and Adjustment Certificate • Cessation valuations | Electronic | Every three years | Email | DCLG, HMRC and all Scheme employers |
| New admission agreements | Hard copy/electronic format | As new employers are entered into the Fund | Post/electronic submission | New "admitted" bodies |
| Resolution of pension disputes | Hard copy or electronic format | As and when a dispute requires resolution | Email or post | Scheme member or his/her representatives, the Pensions Advisory Service/ the Pensions Ombudsman |
| Completion of questionnaires | Hard copy or electronic format | As and when required | Email or post | As required |

Explanation of communications

Pension Fund Valuation Reports – a statutory report issued every three years by the Scheme appointed actuary, setting out the estimated assets and liabilities of the Fund as a whole, as well as setting out individual employer contribution rates for a three year period commencing one year from the valuation date

Resolution of pension disputes – a formal notification of pension dispute resolution, together with any additional correspondence relating to the dispute

Performance Measurement

The Pensions Team already has performance measures set in place and in order to measure the success of our communications with active, deferred and pensioner members, we will use the following methods:

Timeliness

We will measure against the following target delivery timescales:

| <i>Communication</i> | <i>Audience</i> | <i>Statutory delivery period</i> | <i>Target delivery period</i> |
|---|--|--|---|
| Scheme booklet | New joiners to the LGPS | Within two months of joining | Within 3 working days of joining |
| Annual Benefit Statements as at 31 March | Active members | On request | July each year |
| Telephone calls | All | Not applicable | All calls to be answered within 3 rings |
| Issue of retirement benefits | Active and deferred members retiring | Within two months of retirement | Within 5 working days of retirement |
| Issue of deferred benefits | Leavers | Within two months of withdrawal | Within 10 working days of relevant paperwork being received |
| Transfers in | Joiners/active members | Within two months of request | Within 10 working days of relevant paperwork being received |
| Issue of forms i.e. expression of wish | Active members | N/A | Within 3 days of joining the LGPS |
| Changes to scheme rules | Active/deferred and pensioner members, as required | Within two months of the change coming into effect | Within one month of change coming into effect |
| Annual Pension Fund Report and Financial Statements | All | Within two months of request | Within five working days |

Quality

| Audience | Method | To consider | Notes |
|-----------------------------|---|---|--|
| Active and deferred members | Paper based survey with annual benefit statements | All services | Client can benchmark against published service targets. |
| All member types | Assessment against system report | Performance against task management pre-defined performance measures. | One task chosen each quarter from: <ul style="list-style-type: none"> • retirements • new starts and transfers in • transfers out • deferred leavers |
| Employers | Electronic | Scheduled / Admitted body specific issues | feedback |

Results

The Pension Board receives reports on performance at each of its meetings.

Review Process

Our Communications Policy Statement will be reviewed on an annual basis, to ensure it meets audience needs and regulatory requirements. A current version of the Statement will always be available either from the Pensions Team at

Harrow Council
3rd Floor, South Wing
Civic Centre
Station Road
Harrow
HA1 2XF

or on our internet site under www.harrowpensionfund.org