



Purpose: For Decision

Committee Report

Committee	PENSION FUND COMMITTEE
Date	23 NOVEMBER 2022
Title	COMMUNICATION POLICY 2022
Report of	PENSION FUND MANAGER

EXECUTIVE SUMMARY

1. This report presents a proposed revised version of the communications policy for the Isle of Wight Council Pension Fund, which was previously adopted in February 2019.
2. The policy was reviewed by the Local Pension Board at its meeting in October 2022. The board agreed the proposed amendments to the policy, having considered the requirements of the Pension Regulator's single code of practice.

RECOMMENDATION

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| <ol style="list-style-type: none">3. That, on recommendation from the Local Pension Board, the committee adopts the revised Communications Policy for the Isle of Wight Council Pension Fund. |
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BACKGROUND

4. Isle of Wight Council is the administering authority for the Local Government Pension Scheme (LGPS) on behalf of the employers participating in the LGPS through the Isle of Wight Council Pension Fund (the fund). The LGPS is governed by statutory regulations.
5. Everyone with an interest in the fund should have ready access to the information they need. Effective communication between the Isle of Wight Council (the council), the scheme members, and the employers within the fund is essential to the proper management of the fund on a transparent and accountable basis.
6. To communicate effectively, different methods are used according to the need and the target audience. The communication policy sets out the methods by which the fund intends to communicate different information to different audiences.

7. The revised communications policy is presented at Appendix 1. A summary of the changes made to the proposed version from the currently published policy (version 1.3, adopted in February 2019) is presented at Appendix 2.
8. The revised policy removes all reference to personal appointments, as these are no longer offered automatically to scheme members. Face to face meetings can be accommodated if requested. It also places greater emphasis on functionality of the Member Self-Service portal, which allows members to view their personal information and benefit calculations, and the fund's website which publishes scheme information and governance documentation.
9. During 2021, the Pension Regulator consulted on a new single code of practice, applicable to all private and public sector pension schemes, which expands on the requirements for communications and disclosure. It is expected that the final single code will be launched before the end of calendar 2022, so it is appropriate to consider the requirements of that code in determining whether the updated communications policy is fit for purpose.
10. The Communications and disclosure section of the single code contains 11 modules, six of which apply to public sector schemes, as summarised in table 1 below. A copy of the applicable modules of the code is presented at Appendix 3 to this report.

Module no	Module title	Public Sector?
CAD001	General principles for member communications	New
CAD012	Statutory financial statements (PSPS)	Existing
CAD016	Short service refunds/refunds of contributions	Existing
CAD005	Scams	New
CAD010	Publishing information about public service pension schemes	Existing
CAD015	Dispute resolution procedures	Existing

11. The revised communications policy contains the required elements as detailed in the single code. The fund acknowledges that more work needs to be undertaken in respect of the modules on scams and dispute resolution procedures.
12. It is expected that the fund's existing plans to develop its response to cyber risks and the scheduled review of the Complaints and Internal Dispute Resolution Process will address the requirements of those modules.

CORPORATE PRIORITIES AND STRATEGIC CONTEXT

Corporate Aims

13. There is nothing contained in this report which directly contributes to the priorities contained in the [Corporate Plan 2021 - 2025](#).

Pension Fund Strategic Aims

14. The primary objective of the fund is to provide pension and lump sum benefits for members on their retirement and/or benefits on death, before or after retirement, for their dependents, in accordance with the Local Government Pension Scheme (LGPS) regulations and statutory provisions. The committee aims to operate the fund in such a manner that, in normal market conditions, all accrued benefits are

fully covered by the value of the fund's assets and that an appropriate level of contributions is agreed by the employer to meet the cost of future benefits accruing.

15. The fund has also agreed the following objectives, which are supported by information in this report:
 - (a) Communicate in a friendly, expert and direct way to our stakeholders, treating each equally according to their needs.
 - (b) Deliver a high quality, friendly and informative service to all beneficiaries, potential beneficiaries and scheme employers at the point of need.

CONSULTATION

16. The communications policy has been updated by the Pension Fund Manager, in collaboration with members of the Pensions Services team.
17. A version of the policy was provided to the council's Communications team for their consideration. The Principal Communications and Engagement Manager raised the following points:
 - (a) There is nothing explicit that talks of 'promotional' communications.
Response: The Pension Regulator's code of practice covers statutory communications between the fund, its members and employers. While the fund does undertake some promotional activity, for example attending staff induction sessions, it is for the employers to promote membership of the scheme to their employees. Material is provided on the fund's website, and via national bodies (for example Scheme Advisory Board, Pensions and Lifetime Savings Association) to support the employers in this activity.
 - (b) Need to consider whether the website requires review in line with digital accessibility legislation.
Response: The fund's website does have its own accessibility statement, which can be found in the Background Papers section of this report, which covers the key aspects of accessibility. As the technical structure of the website is hosted by Hymans Robertson, a questionnaire will be sent to them to confirm compliance with legislation.
18. No external consultation has been undertaken, as it is not required.

LOCAL PENSION BOARD VIEW

19. At its meeting on 26 October 2022, the Local Pension Board reviewed the proposed amendments to the Communication Policy and considered its sufficiency in light of the requirements of the Pension Regulator's single code of practice.
20. Board members raised a concern about the removal of information offering personal appointments from the policy. In response, the board were assured that individual meetings with members can be accommodated on request, just are not offered as standard practice.
21. Board members also asked about the protocol for elected member media communications. It was explained that councillors were provided media training and

guidance by Isle of Wight Council, and there was no need for specific reference to this activity in the pension fund's policy.

FINANCIAL / BUDGET IMPLICATIONS

22. There are no direct financial implications in approving the revised communications policy.
23. The costs of the Member Self-Service portal are included within the costs of the hosted pension administration software contract, which was recently awarded to Heywood Pensions Technologies for a period of 10 years to December 2032.
24. The annual cost of hosting and maintaining the pension fund's website is £4,000, which is funded from the pension fund's existing revenue budget.
25. The fund participates in the Local Government Association (LGA) Regional Joint Communications Working Group (JCWG). This provides access to templated newsletters, which form the basis of the fund's most recently published newsletters for active and deferred members. The cost for these newsletters was £340 and £255 respectively, which was funded from the fund's existing resource budget.
26. Printing and postage costs, where incurred, are also funded from the pension fund's existing revenue budget.

LEGAL IMPLICATIONS

27. Regulation 61 of the Local Government Pension Scheme Regulations 2013 requires an administering authority to prepare, maintain and publish a policy on communications with members, members' representatives, prospective members and scheme employers. The policy must include details of:
 - the provision of information and publicity about the scheme to members, representatives of members and employing authorities;
 - the format, frequency and method of distributing such information and publicity;
 - the promotion of the scheme to prospective members and their employers.
28. The statement must be revised and re-published following any major changes in policy.
29. The Public Service Pensions Act 2013, introduced the framework for the governance and administration of public service pensions schemes, including the LGPS, and provided an extended regulatory oversight by the Pensions Regulator.
30. The Pension Regulator publishes codes of practice which set out the legal requirements for private sector and public service pension schemes in respect of specific matters, contain practical guidance and set out expected standards of conduct and practice.

EQUALITY AND DIVERSITY

31. The council, as a public body, is required to meet its statutory obligations under the Equality Act 2010 to have due regard to eliminate unlawful discrimination, promote equal opportunities between people from different groups and to foster good

relations between people who share a protected characteristic and people who do not share it. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

32. There are no implications for any of the protected characteristics arising from items covered in the report arising from the new communications policy, which includes a statement mirroring that of the council in terms of accessibility of all publications.

RISK MANAGEMENT

33. It is the responsibility of the Isle of Wight Council, as administering authority for the Isle of Wight Pension Fund, to ensure that the fund is properly governed and administered in compliance with relevant regulations and other requirements. The council has delegated this function to the Pension Fund Committee, under section 101 of the Local Government Act 1972.
34. Adopting the updated communications policy will ensure continued compliance with the requirements of the Pensions Regulator.
35. Should the council fail to ensure appropriate standards of governance and administration of the pension schemes for which it has responsibility, the Pensions Regulator has the powers to issue an improvement notice under section 13 of the Pensions Act 2004. This would have reputational issues for the council.

APPENDICES ATTACHED

36. Appendix 1: Isle of Wight Council Pension Fund DRAFT Communications Policy 2022.
37. Appendix 2: Summary of changes to communications policy between 2019 to 2022 versions.
38. Appendix 3: extract from the Pension Regulators' new code of practice Communications and disclosures.

BACKGROUND PAPERS

39. Isle of Wight Council Pension Fund Communications Policy 2019
<https://www.isleofwightpensionfund.org/resources/communications-policy-february-2019/>
40. Isle of Wight Pension Fund website Accessibility Statement
<https://www.isleofwightpensionfund.org/accessibility-statement/>

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