

LONDON BOROUGH OF HACKNEY PENSION FUND

COMMUNICATIONS STRATEGY STATEMENT (LGPS) 2021/24



Approval date – June 2021
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Version 1

COMMUNICATIONS STRATEGY STATEMENT

Legislative background

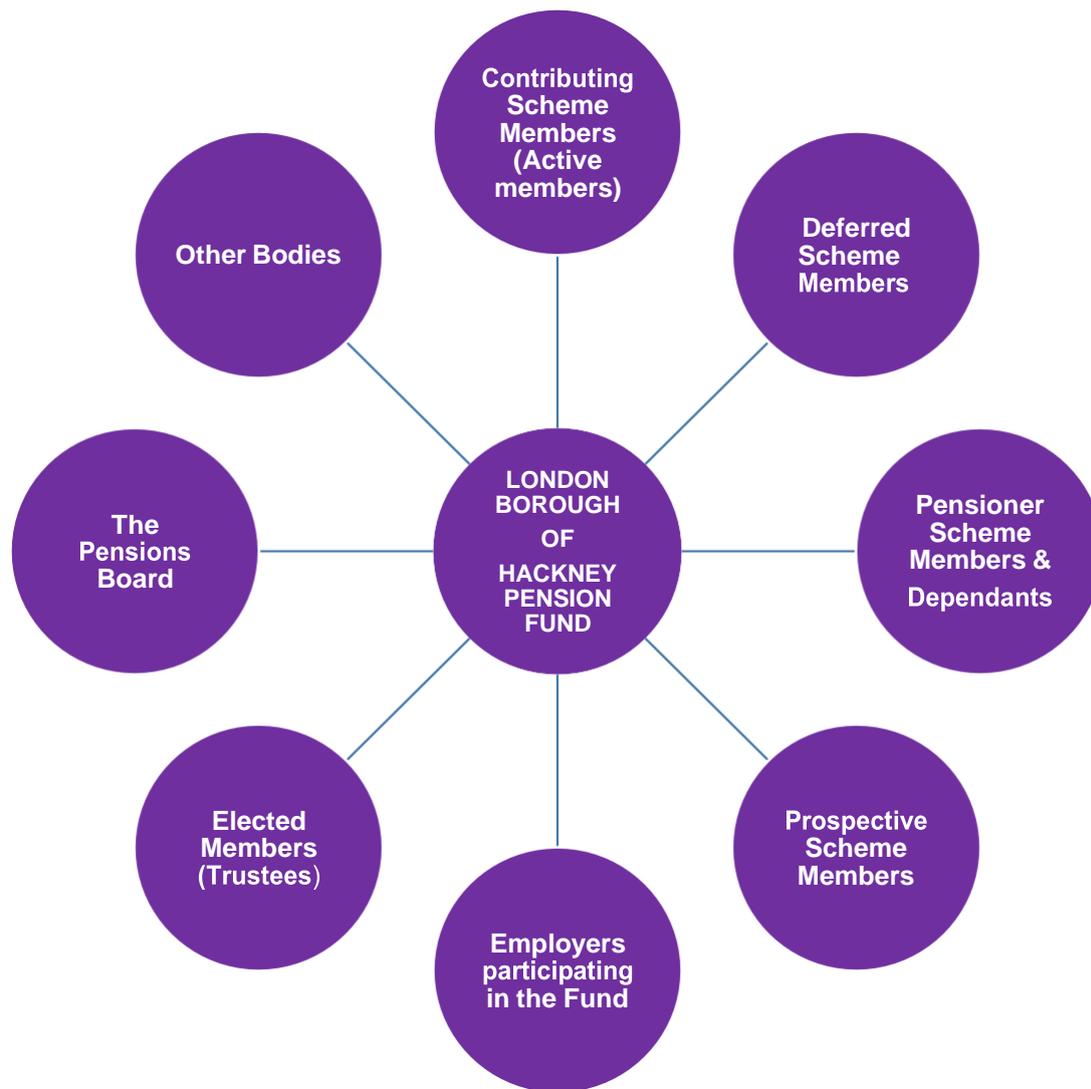
This document sets out the Communications Strategy of the Administering Authority of the London Borough of Hackney Pension Fund as required under Regulation 61 of the Local Government Pension Scheme Regulations (2013).

The Public Service Pensions Act 2013 also introduced a framework for the governance and administration of public sector service pension schemes and provided an extended regulatory oversight of the LGPS to the Pensions Regulator. The Regulator's Code of Practice No14 has detailed guidance on providing good quality communications to members and others, with reference to the Occupational & Personal Pensions Scheme (Disclosure of Information) Regulations 2013 and HM Treasury Directions 2014 on Information about Benefits.

The Regulator is due to replace its Code of Practice No14 (along with several other of its existing codes) into a single New Code. This is expected to come into force later in 2021 or early 2022. References in this document to Code of Practice No14 or to the Regulator's Code should be read as applicable to whichever Code is in force at the time.

Aims and Objectives

The aim of this communications strategy is to make sure that all stakeholders are kept informed of developments within the Pension Fund. We want to ensure transparency, and an effective communication process will help to maintain the efficient running of the Scheme. Regulations require each Administering Authority to prepare, maintain and publish a statement setting out their policy on communicating with the following stakeholders and organisations:



This Communications Strategy has a number of specific objectives relating to how we communicate with our stakeholders, including:

- Promote the scheme as a valuable benefit and provide sufficient and up to date information so members can make informed decisions about their benefits
- Communicate in a plain language style
- Ensure the Fund uses the most appropriate means of communication, taking into account the different needs of different stakeholders
- Look for efficiencies in delivering communications including greater use of technology
- Evaluate the effectiveness of communications and shape future communications appropriately.

Communications Methodology

The administering authority has at its disposal a wide range of options for communicating with the diverse groups that it needs to serve. The method of communication will vary depending on what needs to be communicated and to whom. The methods used by the Administering Authority to communicate with all interested parties are detailed below.

General Communications

We use a range of methods to communicate including paper-based and electronic means. The Fund has a dedicated Pensions website: www.hackneypension.co.uk and the use of a secure portal, 'Sharefile', for employers to upload confidential information. The Fund is in the process of launching Employer Self Service which will provide further options for secure information sharing.

We will accept some communications electronically and will respond electronically where possible. For security reasons, we will not use email for communicating sensitive information or where it is necessary to verify the address or identity of the sender.

- **Pension Scheme Administrators** – The Fund's administrators, Equiniti, will assist with the overall administration of the scheme to ensure the smooth operation of the administrative function.

They can be contacted via the helpline number – 03713 842369 or by email:-

- for scheme members – hackney.pensions@equiniti.com
- for scheme employers – hackney.employers@equiniti.com
- **Website** – Communication in the form of a dedicated Pension Fund website is available which contains a wide range of information not only for scheme members but also scheme employers and other interested parties. The website can be accessed via www.hackneypension.co.uk. The website contains copies of scheme guides, newsletters and other relevant information pertaining to the LGPS.
- **Policy Documents** – These are available for all stakeholders to access either on the website at www.hackneypension.co.uk or on request. Copies of all policy documents are held within the Financial Services Section, Finance and Resources Directorate.
- **Posters** – These will be designed to help those who are both members and non-members of the LGPS, to understand the full range of benefits when participating in the scheme, and providing guidance on how to obtain more information and also how to join the scheme.
- **Council Intranet** – Updates on the scheme and any other relevant news in regard to the LGPS is available through communication updates via the Council intranet, which is the Fund's largest employer.

Branding

As the pension fund is administered by Equiniti, all literature and communications will include a combination of the branding of the London Borough of Hackney, Hackney Pensions and Equiniti.



Data Protection Statement

To protect members' personal information, the London Borough of Hackney Pension Fund and the pension administrators, Equiniti, are registered under the Data Protection Act 2018. This allows members to check that their details held are accurate.

The Fund may, if it chooses, pass certain details to a third party, if the third party is carrying out an administrative function of the Fund, for example, the Fund's AVC provider. Members who wish to submit a Subject Access Request for their data should contact the pension administrators, Equiniti, on 03713 842369 or by email - hackney.pensions@equiniti.com.

The Data Protection Act 2018 (DPA) includes rules on providing privacy information which are more detailed and specific than those in the Data Protection Act 1998 which formerly applied. To ensure compliance with the DPA, the Fund provided all members with a Privacy Notice, setting out certain prescribed information including the purpose for which member data is being collected, which organisations will receive it and how it will be safeguarded.

National Fraud Initiative (NFI)

This authority is under a duty to protect the public fund it administers, and to this end may use information for the prevention and detection of fraud. This includes our participation in the Government's National Fraud Initiative (NFI), and it may also share information with other bodies responsible for auditing, or administering public funds, solely for the purposes of preventing and/or detecting fraud.

Strategy on Communicating with Contributing (active) Scheme Members, Deferred and Pensioner Members

All members of the Scheme (active, deferred and pensioner members) will be kept informed about their benefits, developments in the Scheme and any changes to the scheme of a regulatory or operational nature. This includes consultation with representative groups as required. Communication will be via the following methods (please note that any face to face meetings/presentations will not be available whilst Covid restrictions are in place):

- **Scheme Guides** – There are scheme guides available for members setting out the conditions of membership and the main scheme benefits that apply under the Local Government Pension Scheme (LGPS). The scheme guides can also be found on the Pension Fund website at www.hackneypension.co.uk which is available for any member to access.
- **Member Self-Service** – During 2021 we are implementing the facility for all scheme members to be able to securely access their pension details held on the pension administrator's database. This will allow scheme members to check their personal details and advise the administrators of any changes. It will also have the ability for scheme members to produce an estimate of their potential LGPS benefits due to them at retirement. Pensioner members will be able to view payslips and P60's and their address details.

- **Annual Benefit Statements** – Active and deferred scheme members are entitled to an annual benefit statement detailing the benefits that they might expect at retirement. These are issued annually and would normally be issued by 31st August each year. These contain vital information for scheme members and enable individuals to make informed choices about their retirement options.
- **Pension Surgeries** – based at Hackney Service Centre, 1 Hillman Street, London, E8 1DY. Pension Officers can be contacted by email pensions@hackney.gov.uk or alternatively contact by telephone 020 8356 2521/4266/6802, for members (active, deferred and pensioners) to make an appointment to discuss their benefits, retirement issues and the options available in the Scheme.
- **Pension Roadshows/Presentations** – Roadshows and presentations are used to target specific topics or when major scheme changes occur, enabling all members of the LGPS to have access to information. General meetings and presentations will be held when appropriate to communicate the benefits and options available to scheme members and prospective members.
- **Pre-retirement seminars** – Presentations on the scheme and benefit choices at pre-retirement seminars facilitated by the Hackney Pensions team, to help scheme members approaching retirement prepare for the financial and lifestyle changes retirement brings.
- **Newsletters** – These will be sent to scheme members to communicate changes in regulations, developments in the fund and to inform members of changes in policy. The exact timing and nature of these newsletters will vary depending on what developments are taking place. However if there are regulatory changes which are likely to impact on individuals' benefits or scheme membership in any significant way, then newsletters will be sent to members in sufficient time for them to be able to act upon that information. An annual fund newsletter is sent to all scheme members providing information on the state of the fund, performance of the fund and any major changes which have taken place during the year.
- **Pensioner Payslips** – All pensioners receive a payslip each month along with their P60 at the end of the year. Electronic payslips will also be available to those registered for self-service.
- **Pension Increase notifications** – The notification of the annual increase to pensioner benefits is sent out each April to every member in receipt of a pension.
- **Certificates of Continued Entitlement to Pensions (Life Certificates)** – The Fund will undertake an annual exercise, conducted through correspondence, in order to establish the continued existence of the following pensioners:
 - All pensioners living abroad (outside the UK).
 - Those over the age of 80
 - Those pensioners receiving pension benefits by cheque
 - Those retired on ill health grounds.

This exercise will also be undertaken every 3 years to establish the continued existence of ALL members in receipt of a pension.

- **Pension Fund Report and Accounts Summary** – This provides a summary of the Pension Fund during the financial year and will be distributed to all scheme members once the accounts have been published
- **McCloud exercise** – the Fund is currently carrying out an exercise to ensure that the age discrimination that occurred when the CARE scheme was introduced in 2014 is rectified. The Fund will provide regular updates to members via the Fund website and will write to notify any members whose benefits are increasing as a result of the review.
- The Fund will also send specific communications to those members who breach, or at risk of breaching, pensions tax limits. Please see the Fund's separate 'Policy for Administration and Communication of Pension Tax Allowances to Members' for more information.

Strategy on Communicating with New and Prospective Scheme Members

We will make information available to all prospective scheme members, new employees and prospective employees. All new employees will be contractually enrolled into the LGPS where eligible and will be sent information regarding the scheme. They can still choose to opt-out should they wish.

- **Initial Contact** - All permanent new members of staff who are eligible to join the Scheme are contractually enrolled into the LGPS, where the employer is a scheduled body or open admission agreement contractor. Each new member is sent a welcome letter and statutory notice by the pension administrators confirming their membership of the LGPS along with details of where to find an electronic copy of the scheme guide, and further details of the scheme.
- **Induction seminars** – Presentation on the scheme and its benefits at the weekly induction seminars for all new employees of the Council, which are facilitated by HR, providing prospective new members of the scheme information in order for them to make an informed decision in regard to membership of the scheme. Induction seminars are also provided for other employers on request.
- **Liaison Officer, Pensions** – based at Hackney Service Centre, 1 Hillman Street, London E8 1DY, the Liaison Officer is easily contactable by email: pensions@hackney.gov.uk telephone 020 8356 6802, or letter. It is also possible to arrange a 1-2-1 meeting to discuss the benefits and options available to prospective members.
- **Scheme Guides** – There are scheme guides available for prospective members setting out the conditions of membership and main scheme benefits that apply under the Local Government Pension Scheme (LGPS). A copy of these will be provided electronically to new employees and prospective members of the Scheme, and at other times on request. The scheme guides can also be found on the Pension Fund website www.hackneypension.co.uk which is available for any member to access.

Strategy on Communicating with Employers participating in the Fund

We will keep employers in the Pension Fund informed about developments in the Scheme and consult on changes to the Scheme as required. Potential scheme employers will also have access to information about the Pension Fund to ensure that they are fully informed in their relationship with the Fund.

- **Employer Guide** – This is a guide for scheme employers outlining the details of the scheme and the administrative arrangements for the scheme, and is available on the website www.hackneypension.co.uk. Training on procedures in relation to the employer guide is also available upon request.
- **Employer Seminars/Meetings** – Annual employer forums are held to update employers of relevant current issues, policy changes and investment updates. Further seminars/meetings will be held as appropriate to communicate changes in policy within the Scheme or to discuss major issues affecting all employers such as the triennial actuarial review. Individual meetings with separate employers can be held annually or as required. Employers will also be notified in writing of any changes which affect them or the way that the scheme is administered.
- **Email** – Periodic emails are sent to keep scheme employers up to date with topical pension matters, and payroll issues that may have an effect on pensions, including articles from LGA Circulars and Bulletins, and any relevant external training courses they may wish to attend
- **Secure Portal** – The Fund has a secure portal ‘Sharefile’ which facilitates the transfer of sensitive information and data between the Fund and Employers electronically. Access rights are strictly controlled by the pension administrators, Equiniti. The Fund is in the process of implementing Employer Self Service which will provide further secure options for uploading data directly to the administration system.
- **Website** – The website has a dedicated area for Scheme Employers and is used to access detailed information on procedures which must be followed to administer the LGPS and holds a wide range of information in regard to Employer Guides, pension forms, newsletters and policies. The website can be accessed via www.hackneypension.co.uk
- **Pensions Administration Strategy (PAS)** – The administration strategy sets out the roles and responsibilities of the Administering Authority (the London Borough of Hackney), the third party administrator and employers in the Pension Fund and can be found on the website at: www.hackneypension.co.uk. It sets out the service level agreement and targets which all are expected to meet.
- **Employer Training** – The Fund offers all Scheme Employers training on the LGPS and their role in the administration of the scheme. This covers the full range of administrative and regulatory duties under the scheme regulations.
- **Annual Report and Accounts** – This contains details of the Pension Fund during the financial year, income and expenditure as well as other related details. This is a detailed and lengthy document and will therefore not be routinely distributed, except on request. The full document will be published on the website at www.hackneypension.co.uk.

Strategy on Communicating with Elected Members and other Pensions Committee members

Information will be provided to Council Members and other Pensions Committee members in order for them to be able to fulfil their duties under the role of administering authority.

- **Access to Pensions Committee** – The Pensions Committee is the Committee which has delegated power to review, administer and monitor the Pension Fund. The Committee meets a minimum of four times a year, or more frequently as required. Meetings are open to members of the public, although there may be occasions when members of the public are excluded due to the confidential nature of matters under discussion.
- **Committee Reports** – Reports to Pensions Committee and to other Committees as necessary, for example Corporate Committee and Council, ensure that Council Members are kept informed of developments in relation to Pension Fund issues and the impact that these can have on overall Council policies and procedures. These are published on the Council's website. The agenda, reports and minutes of the meetings are available on the Council's website.
- **Training** – Committee Member training is a standing agenda item and the Committee liaises with Officers on training needed and received on an on-going basis each year. They are also kept informed of any relevant external training courses.
- **Presentations** – Officers and advisers to the Fund deliver presentations on investment and administration matters to the Committee as required.

Strategy on Communicating with the Pensions Board

The Pension Board will meet at least twice a year in the ordinary course of business and additional meetings may be arranged as required to facilitate its work.

- **Reports to The Pensions Board** - The Pension Board will be treated in the same way as a Committee of Hackney Council and, as such, members of the public may attend and papers will be made public in the same way as described above for the Pension Committee.
- **Training** – The Pension Board will be provided with, and be required to undertake, appropriate training, either provided internally by Officers or externally.

Strategy on Communicating with Other Bodies

There are a number of other interested parties with whom we will communicate as required. These include:

- **The Ministry of Housing, Communities & Local Government (MHCLG)** – regular contact with MHCLG as regulator of the scheme, participating and responding to consultations as required.

- **Trade Unions** – we will work with relevant trade unions to ensure the Scheme is understood by all interested parties. Efforts will be made to ensure all pension related issues are communicated effectively with the trade unions.
- **Employer Representatives** - we will work with relevant employer representative bodies to ensure that the Fund's views are represented to employer groups.
- **London CIV** – the London Collective Investment Vehicle was established by a group of 32 London based Councils to invest assets on a pooled basis for the LGPS Funds administered by those Councils. It is important that the London CIV understands the Fund's strategies so that the assets are invested in accordance with those strategies. Communication with the CIV will be in a number of ways including directly at officer level and via the various committees and groups established as part of the London CIV governance structure. The Hackney Pensions Committee will also receive regular updates on the activities of the CIV and will also be responsible for deciding the assets to be invested in the CIV. The Group Director, Finance and Corporate Resources, is a non-executive Director of the London CIV Board which is a further method of exchanging information. The Chair of the Pensions Committee and the Group Director, Finance and Corporate Resources, are also members of the London CIV Shareholders Committee.
- **Pension Fund Investment Managers, Advisers and Actuaries** –
 - Regular meetings with the Fund Managers who invest funds on behalf of the Fund.
 - Regular meetings with Investment Advisers who provide help and advice on the asset allocation and investments of the Fund.
 - Regular meetings with the Fund's Benefits and Governance Advisers who provide guidance on the administration of the Fund and its governance arrangements.
 - Regular meetings with the Fund Actuary to discuss funding levels, employer contributions and valuation of the assets and liabilities of the Fund.
- **Pension Fund Custodian** – The Fund's Custodian is HSBC, who ensures the safekeeping of the Funds investment transactions and all related share certificates.
- **Third Party Administrator** – Hackney Council has chosen to outsource the administration of the Fund to a third party administrator who is responsible for maintaining all pension scheme member records, calculating and communicating scheme members' entitlements and liaising with employers to collect pension related information and contributions. The Fund's current third party administrator is Equiniti.
- **AVC Provider** – Additional Voluntary Contributions (AVC) are a way to top up your pension benefits, and in some instances provide tax free lump sum depending on the policy, and are held and invested separately from the LGPS. The Fund's current AVC provider is Prudential.
- **Pensions and Lifetime Savings Association (PLSA)** – The Fund is a member of PLSA, which provides an opportunity for administering authorities to discuss issues of common interest and share best practice.
- **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.

- **London Pension Officers Group (LPOG) & London Pension Officers Forum (LPOF)** – the Fund is a member of these voluntary groups. Meetings are held on a quarterly basis to share information and ensure standardised interpretations of LGPS regulations and best practice.
- **Requests for Information (FOI)** - 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.
- **Consultations** – There are occasions when the administering authority 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 Hackney Pension 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. Interested parties and representative groups will be approached to provide feedback to the policy changes before amendments are enacted.
- **Minority Groups** – It is recognised that there may be occasions when some minority groups may not be able to access all the information available to others. The Pension Fund will try to ensure that information is available to the widest possible audience and as such will try to ensure that minority groups do have access to information. This is however a developing area and feedback on how to promote better access for all minority groups is welcome.

Measuring whether we meet our Communication Strategy objectives

The Fund will monitor success against our communication objectives in the following ways:

Objectives	Measurement
Promote the scheme as a valuable benefit and provide sufficient and up to date information so members can make informed decisions about their benefits	Customer satisfaction surveys with scheme members achieving 90% of scores in positive responses in these areas
Communicate in a plain language style	Customer satisfaction surveys with employers and scheme members achieving 90% of scores in positive responses in these areas
Ensure the Fund uses the most appropriate means of communication, taking into account the different needs of different stakeholders	Customer satisfaction surveys with employers and scheme members achieving 90% of scores in positive responses in these areas

Look for efficiencies in delivering communications including greater use of technology	Evidence of consideration given towards available technology solutions
Evaluate the effectiveness of communications and shape future communications appropriately	<p>Satisfaction survey is undertaken annually, and/or on an ongoing basis</p> <p>Results from satisfaction survey are thoroughly analysed and investigated, and trends monitored from previous periods (at least annually)</p> <p>Detailed analysis of survey results is used to identify areas to improve communications in future</p>

An overview of our performance against these objectives will be reported within the Fund's Annual Report and Accounts and also reported on an ongoing basis to the Pension Fund Committee and Pension Board.

If performance is substantially below standard (whether by a large margin for a short period of time or a small margin for a longer period of time) the Fund will formulate an improvement plan. This will be reported to the Fund's Pension Fund Committee and Pension Board together with an ongoing update on achievement against the improvement plan.

Key Risks

The key risks to the delivery of this Strategy are outlined below. Fund officers will work with the Pensions Committee and Pension Board in monitoring these and other key risks and consider how to respond to them.

- Significant external factors, such as national change, impacting on workload
- Lack or reduction of skilled resources due to difficulty retaining and recruiting staff members
- Inadequate performance of Equiniti against service standards
- Increase in the number of employing bodies causing strain on day to day delivery
- Incorrect calculation of members' benefits, resulting in inaccurate costs
- Employer's failure to provide accurate and timely information resulting in incomplete and inaccurate records. This leads to incorrect valuation results and incorrect benefit payments
- Issues in production of annual benefits statements, e.g. wrong address and printing errors due to external supplier
- Failure to administer the scheme in line with regulations. This may relate to delays in enhancement to software or regulation guidance
- Failure to maintain records adequately resulting in inaccurate data
- Unable to deliver an efficient service to pension members due to system unavailability or failure.

Communication Material

The table below shows the Fund communications along with their publication frequency and the format in which they are available to their intended audience.

Communication Material	Paper form	Electronic form	Website	Frequency	Intended Audience (active, deferred, pensioner, prospective members, employers or ALL)
Annual Benefit Statements	✓	✓	✗	Annually	Active, Deferred
Annual Newsletter	✓	✓	✓	Annually	All members
Pension Updates	✓	✓	✓	When details available	Active, Prospective, Employers
Ad hoc Newsletters	✓	✓	✓	As required	ALL
Payslips	✓	✗	✗	Monthly	Pensioners
Notice of Pension Increase (PI)	✓	✗	✓	Annually (April)	Pensioners
Scheme Updates/Changes	✓	✓	✓	As required	Active members/Employers (& schools)
Scheme Guides	✗	✓	✓	When requested	ALL
Induction Sessions	✓	✓	✗	Weekly	Prospective
Pre-Retirement Seminars	✗	✓	✓	As required	Active
Employer Forum	✗	✓	✓	Annually	Employers
Pensions Administration Strategy (PAS)	✗	✓	✓	Reviewed triennially	Employers (& schools)
Pension Committee	✓	✓	✓	4 to 6 meetings per financial year	ALL

Pension Board	✓	✓	✓	2 meetings per financial year	ALL
Communications Strategy Statement	✗	✓	✓	Reviewed triennially	ALL
Full Report & Accounts	✗	✓	✓	Annually (September)	ALL
Statement of Investment Principles	✓	✓	✓	Annually (April)	ALL
Ad-Hoc Queries	✓	✓	✗	Within set timescales	ALL

Feedback

The Fund welcomes comments and feedback from scheme members, scheme employers, prospective members and other interested parties. The mechanisms for feedback include consultation periods, direct communication with the scheme administrators, use of on-line facilities and direct communication with the Financial Services Section, which oversees all aspects of the Pension Fund.

Feedback Mechanism	Paper form	Electronic form	Website	Frequency	Intended Audience (active, deferred, pensioner, prospective members, employers or ALL)
Employer Forum	✓	✗	✗	Annually (Feb/March)	Employers
Pensions Administration Strategy (PAS)-consultation period	✗	✓	✗	Annually (Jan/Feb)	Employers (& schools)
Weekly Inductions/Pre-retirement seminars	✓	✓	✗	When held	Prospective/Actives
Customer Satisfaction Surveys	✓	✓	✗	Annually	ALL
Ad hoc Surveys	✓	✓	✗	When required	ALL/specific audience

The feedback received on the PAS, Employer Forums and Weekly Inductions/Pre-retirement seminars are reported to the Pension Committee on a regular basis. Committee reports will also incorporate the results and feedback on annual bulk or specific surveys that may be undertaken by the Fund in conjunction with the pension administrators, Equiniti.

The results and feedback will be used to assist the Fund to continually make improvements to the service by amending/updating its administration practices, increasing efficiency and thereby improve members experience when contacting/interacting with the Fund and the administrators. Enhancements and efficiencies to the service will be reported to Pensions Committee and/or Pensions Board as appropriate.

Contact Details

Contact details are provided below for the relevant departments. General administrative queries relating to pension scheme membership issues should be addressed to:

London Borough of Hackney Pensions
Equiniti
Russell Way
Crawley
West Sussex RH10 1UH

Tel No: 03713 842369

To contact them by email -

- for members of the scheme - hackney.pensions@equiniti.com
- for Administration staff – hackney.employers@equiniti.com

For other queries and feedback issues, please contact:

Financial Services Section
London Borough of Hackney
Financial Management
4th Floor Hackney Service Centre
1 Hillman Street
London
E8 1DY

Tel no: 020 8356 2521

Email: pensions@hackney.gov.uk

Review of the Communications Strategy Statement

This strategy document will be reviewed at least every three years and updated as required when there are significant changes to be made and, if appropriate, will be consulted upon with the relevant stakeholders.

Regulatory Background

Local Government Pension Scheme Regulations 2013

Below is the relevant extract from Regulation 61 of the Local Government Pension Scheme Regulations 2013, which sets out the requirements of the Communications Policy for LGPS Funds:

Statements of policy concerning communications with members and Scheme employers

61. (1) An administering authority must 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.

(2) In particular the statement must set out its policy on—

- (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.

(3) The statement must be revised and published by the administering authority following a material change in their policy on any of the matters referred to in paragraph (2).