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THE ROYAL  
BOROUGH OF



KENSINGTON  
AND CHELSEA

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Royal Borough of  
Kensington and Chelsea  
Pension Fund

# Communications Policy Statement

**November 2012**

## PENSION FUND COMMUNICATIONS POLICY STATEMENT

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## 1. Introduction

This is the Communications Policy Statement of The Royal Borough of Kensington and Chelsea Pension Fund, administered by The Royal Borough of Kensington and Chelsea (the Administering Authority).

The Royal Borough, in its capacity as Administering Authority engages with 6 further employers and approximately 3400 active scheme members, 3700 deferred members and 2400 pensioners in relation to the Local Government Pension Scheme (LGPS). The delivery of benefits involves communication with a number of other interested parties. This statement provides an overview of how we communicate and how we intend to measure whether our communications are effective. It is valid from 1 November 2012..

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

**Maria Bailey, Pensions Manager, Royal Borough of Kensington and Chelsea,  
Town Hall, Hornton Street, LONDON W8 7NX**

## 2. Regulatory Framework

This policy statement is required by the provisions of Regulation 106 B of the Local Government Pension Scheme Regulations 1997. The Regulation requires authorities to:

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

- (a) members.*
- (b) representatives of members.*
- (c) prospective members.*
- (d) employing authorities.”*

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 employing authorities;*
- (b) the format, frequency and method of distributing such information or publicity; and*
- (c) the promotion of the Scheme to prospective members and their employing authorities.”*

As a provider of an occupational pension scheme, we are already obliged to satisfy the requirements of the Occupational Pension Schemes (Disclosure of Information) Regulations and other legislation, for example the Pensions Act 2008. Previously, disclosure requirements have been prescriptive, concentrating on timescales rather than quality. From 6 April 2006 more generalised disclosure requirements were introduced, supported by a Code of Practice. The type of information that pension schemes are required to disclose has remained much the same as before, although prescriptive timescales have been replaced with a more generic requirement to provide information within a “reasonable period”. The Code of Practice<sup>1</sup> issued by the Pensions Regulator came into force from May 2006 and sets out suggested timescales in which the information should be provided. 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 is set out in the Performance Management section of this document, alongside those proposed by the Pension Regulator in the Code of Practice.

### **3. Responsibilities and Resources**

Communication material is collated by Capita.

Capita’s LGPS Technical Consultants writes and designs all communications including any web based or electronic material. The Pension Team at the Council is responsible for arranging all forums, workshops and meetings covered within this statement. All design work is carried out by the Capita’s Communications Team.

### **4. Communication with Key Audience Groups**

#### **4.1 Our audience**

We communicate with a number of stakeholders. For the purposes of this Communications Policy Statement, we refer to our communications with the following audience groups:

- active members
- deferred members
- pensioner members

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<sup>1</sup> Code of Practice – Reasonable periods for the purposes of the Occupational Pension Schemes (Disclosure of Information) Regulations 2006 issued September 2005

- prospective members
- employing authorities (scheme employers and admission bodies)

In addition, there are a number of other stakeholders with whom we communicate on a regular basis, such as Her Majesty's Revenue and Customs, the Department for Communities and Local Government, solicitors, the Pensions Advisory Service, and other pension providers. We also consider as part of this policy how we communicate with these interested parties.

## **4.2 How we communicate**

### ***General communication***

We use paper-based communication as our main means of communicating. However we complement this by use of electronic means such as our website [[www.pensions.rbkc.gov.uk](http://www.pensions.rbkc.gov.uk)] and the Council's intranet. We will accept most communications electronically and we will respond electronically, where possible. For security reasons, we will not use e-mail for communicating sensitive information, or where it is necessary to verify the address or identity of the sender.

There is a dedicated customer telephone number that takes all general enquiries through to our Pensions Team. The Pension Team staff are responsible for a group of scheme members according to surname. Any phone calls are dealt with initially by the person answering the phone, then passed to the relevant person within the section. Direct line phone numbers are advertised and included in correspondence to allow easier access to the relevant person.

### ***Branding***

As the Pension Fund is administered by Capita, all literature and communications will conform to the branding of Capita.

### ***Accessibility***

We recognise that individuals may have specific needs in relation to the format of our information or the language in which it is provided. Demand for alternative formats/languages is not high enough to justify the cost of preparing alternative format/language material automatically. However, on all communication from the Pensions Section, we will include a statement offering the communication in large print, Braille, on cassette or in another language on request.

## 5. Policy on communication with active, deferred and pensioner members

Our objectives with regard to communication with members are:

- for the LGPS to be used as a tool to attract and retain employees
- for better understanding by staff on the benefits of the LGPS
- to provide more opportunities for face-to-face communication
- as a result of improved communication, for queries and complaints to be reduced
- to increase take up of the LGPS by employees

Our objectives will be met by providing the following communications, which are over and above individual communications with members (for example, the notifications of scheme benefits or responses to individual queries). The communications are explained in more detail beneath the table:

<b><i>Method of Communication</i></b>	<b><i>Media</i></b>	<b><i>Frequency of issue</i></b>	<b><i>Method of Distribution</i></b>	<b><i>Audience Group (Active, Deferred, Pensioner or All)</i></b>
Scheme booklet	Paper based and on website	At joining and on request	Post to home address/via employers	Active
Newsletters	Paper based and on website	Annually and after any scheme changes	Via employers/post to home address	Separately for active, deferred and pensioners
Pension Fund Report and Accounts	On website	Annually	On request	All
Estimated Benefit Statements	Paper based	Annually and on request	Post to home address/via employers for active members. To home address for deferred members.	Active and Deferred.
Factsheets	Paper based and on website	On request	On request	Active and deferred
Website	Electronic	Continually available	Advertised on all communications	All

## PENSION FUND COMMUNICATIONS POLICY STATEMENT

<b>Method of Communication</b>	<b>Media</b>	<b>Frequency of issue</b>	<b>Method of Distribution</b>	<b>Audience Group (Active, Deferred, Pensioner or All)</b>
Roadshows	Face to face	When major scheme changes occur	Advertised in newsletters, via posters and pensioners payslips	All
Face to face discussion sessions	Face to face	On request	On request	All
Education sessions	CD/DVD	Continually available/as requested	On request	Active and deferred members
Joiner packs	Paper based	On joining	Post to home addresses	Active members

### ***Explanation of communications***

**Scheme booklet** - A booklet providing a 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** - An annual/biannual newsletter which provides updates on to changes to the LGPS as well as other related news, such as national changes to pensions, forthcoming roadshows and contact details.

**Pension Fund Report and Accounts** – Details of the value of the Pension Fund during the financial year, income and expenditure as well as other related details, for example, the current employing authorities and scheme membership numbers. This is a detailed and fairly lengthy document and therefore will not be routinely distributed, since it is available on the Council's web site.

**Estimated Benefit Statements** – For active members these include the current value of benefits as well as the projected benefits as at their earliest retirement date and at age 65. 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. State benefits are also included. In relation to 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.

## PENSION FUND COMMUNICATIONS POLICY STATEMENT

Factsheets – leaflets that provide a summary in relation to specific topics, such as topping up pension rights, transfer values in and out of the scheme, death benefits and, for pensioners, annual pensions increases.

Website – The website will provide scheme specific information, forms that can be printed or downloaded, access to documents (such as newsletters and report and accounts), frequently asked questions and answers, links to related sites and contact information.

Roadshows – Every year, a representative of the Pension Team will visit a particular location to provide a presentation on a particular topic of interest and face to face consultation with staff if required.

Face to face education sessions – education sessions available on request for small groups of members. For example, where an employer is going through a restructuring, it may be beneficial for the employees to understand the impact any pay reduction may have on their pension rights.

Joiner packs – These complement the joiner booklet and enclose information on AVCs and the paperwork needed to join the scheme.

### 6. Policy on promotion of the scheme to prospective members

Our objectives with regard to communication with prospective members are:

- to improve take up of the LGPS with the new auto-enrolment scheme
- for the LGPS to be used as a tool to attract and retain employees

As the Pension Section does not have direct access to prospective members, we work in partnership with the employing authorities and the Royal Borough's Personnel Department to meet these objectives. We will do this by providing the following communications:

<b><i>Method of Communication</i></b>	<b><i>Media</i></b>	<b><i>Frequency of Issue</i></b>	<b><i>Method of Distribution</i></b>	<b><i>Audience Group</i></b>
Overview of the LGPS leaflet	Paper based	On commencing employment	Via employers	New employees
Educational sessions	As part of induction workshops	On commencing employment	Face to face	New employees
Promotional newsletters/flyers	Paper based	Annually	Via employers	Existing employees
Posters	Paper based	Ongoing	Via employers	New and existing employees



**Explanation of communications**

Overview of the LGPS leaflet - A short leaflet that summarises the costs of joining the LGPS and the benefits of doing so.

Educational sessions – A talk providing an overview of the benefits of joining the LGPS.

Promotional newsletters, flyers and posters – These will be designed to help those who are not in the LGPS to understand the benefits of participating in the scheme and provide guidance on how to join the scheme.

**7. Policy on communication with employing authorities**

Our objectives with regard to communication with employers are to:

- improve relationships
- assist them in understanding costs/funding issues
- work together to maintain accurate data
- ensure they understand the benefits of being an LGPS employer
- assist them in making the most of the discretionary areas within the LGPS

Our objectives will be met by providing the following communications:

<b>Method of Communication</b>	<b>Media</b>	<b>Frequency of issue</b>	<b>Method of Distribution</b>	<b>Audience Group</b>
Employers' Guide	Paper based and on employer website	At joining and updated as necessary	Post or via email	Main contact for all employers
Newsletters	Electronic (email) and Pension Fund website	Quarterly or more frequent if necessary	Email	All contacts for all employers
Annual employers meeting	Face to face	Annually	Invitations by email	All contacts for all employers
Employers focus groups	Face to face	At least quarterly/half yearly	Invitations by email	Main contacts or specific groups (e.g. HR or payroll) depending on topics
Pension Fund Report and Accounts	Royal Borough website	Annually	Electronic	Main contact for all employers

## PENSION FUND COMMUNICATIONS POLICY STATEMENT

<b>Method of Communication</b>	<b>Media</b>	<b>Frequency of issue</b>	<b>Method of Distribution</b>	<b>Audience Group</b>
Meeting with adviser	Face to face	On request	Invite sent by post or email	Senior management involved in funding and HR issues.

### **Explanation of communications**

Employers' Guide - A detailed guide that provides guidance on the employer responsibilities including the forms and other necessary communications with the Pension Section and scheme members.

Newsletters – A technical briefing newsletter that will include recent changes to the scheme, the way the Pension Section is run and other relevant information so as to keep employers fully up to date.

Annual employers meeting – A formal seminar style event with a number of speakers covering topical LGPS issues.

Employers' focus groups – Generally workgroup style sessions set up to debate current issues within the LGPS.

Pension Fund Report and Accounts – Details of the value of the Pension Fund during the financial year, income and expenditure as well as other related details, for example, the current employing authorities and scheme membership numbers.

Adviser meeting – Gives employers the opportunity to discuss their involvement in the scheme with advisers.

### **8. Policy on communication with senior managers**

Our objectives with regard to communication with senior managers are:

- ensure they are fully aware of developments within the LGPS
- ensure that they understand costs/funding issues
- provide costings for proposed individual early retirements

Our objectives will be met by providing the following communications:

<b>Method of communication</b>	<b>Media</b>	<b>Frequency of Issue</b>	<b>Method of Distribution</b>	<b>Audience Group</b>
Briefing papers	Paper based and electronic	As and when required	Email or hard copy	All
Committee papers	Paper based and electronic	In advance of committee	Hard copy	All

***Explanation of communications***

Briefing papers – a briefing that highlights key issues or developments relating to the LGPS and the Fund, which can be used by senior managers when attending meetings

Committee paper – a formal document setting out relevant issues in respect of the LGPS, in many cases seeking specific decisions or directions from elected members.

**9. Policy on communication with union representatives**

Our objectives with regard to communication with union representatives are to:

- foster close working relationships by communicating the benefits of the scheme to their members
- ensure they are aware of the Pension Fund’s policy in relation to any decisions that need to be taken concerning the scheme

Our objectives will be met by providing the following communications:

<b><i>Method of communication</i></b>	<b><i>Media</i></b>	<b><i>Frequency of Issue</i></b>	<b><i>Method of Distribution</i></b>	<b><i>Audience Group</i></b>
Briefing papers	Paper based and electronic	As and when required	Email or hard copy	All
Face to face education sessions	Face to face	On request	On request	All

***Explanation of communications***

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

Face to face education sessions – these are education sessions that are available on request for union representatives and activists, for example to improve their understanding of the basic principles of the scheme, or to explain possible changes to policies.

**10. Policy on communication with elected members**

## PENSION FUND COMMUNICATIONS POLICY STATEMENT

Our objectives with regard to communication with elected members are to:

- ensure they are aware of their responsibilities in relation to the scheme
- seek their approval to the development or amendment of discretionary policies, where required
- seek their approval for formal responses to Government consultation in relation to the scheme

Our objectives will be met by providing the following communications:

<i><b>Method of Communication</b></i>	<i><b>Media</b></i>	<i><b>Frequency of Issue</b></i>	<i><b>Method of Distribution</b></i>	<i><b>Audience Group</b></i>
Knowledge updating sessions	Presentations, course materials and workshops	For new Committee Members and as and when required	As appropriate	All members of the Investment Committee
Briefing papers	Paper based and electronic	As and when required	Email or hard copy	All members of the Investment Committee
Investment Committee meetings	Meeting	Quarterly and as required.	Attendance by members of the Investment Committee	All members of the Investment Committee

### ***Explanation of communications***

Knowledge updating sessions – providing a broad overview of the provisions of the LGPS, elected members’ responsibilities within it and information on different investment asset classes.

Briefing papers – a briefing that highlights key issues and developments to the LGPS and the Royal Borough’s Pension Fund.

Investment Committee meetings - a formal meeting of elected members, attended by senior managers, at which local decisions in relation to the scheme are taken.

### **11. Policy on communication with Pension Team staff**

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

- ensure they are aware of changes and proposed changes to the scheme
- provide on the job training to new staff
- develop improvements to services, and changes to processes as required
- agree and monitor service standards

## PENSION FUND COMMUNICATIONS POLICY STATEMENT

Our objectives will be met by providing the following communications:

<b>Method of Communication</b>	<b>Media</b>	<b>Frequency of Issue</b>	<b>Method of Distribution</b>	<b>Audience Group</b>
Face to face training sessions	Face to face	As required	By arrangement	All
Staff meetings	Face to face	As required, but no less frequently than monthly	By arrangement	All
Attendance at seminars	Externally provided	As and when advertised	By email, paper based	All

### **Explanation of communications**

Face to face training sessions – which enable new staff to understand the basics of the scheme, or provide more in depth training to existing staff, either as part of their career development or to explain changes to the scheme.

Staff meetings – to discuss any matters concerning the local administration of the scheme, including for example, improvements to services or timescales.

Attendance at seminars – to provide more tailored training on specific issues.

## **12. Policy on communication with taxpayers**

Our objectives with regard to communication with taxpayers are to provide access to key information in relation to the management of the scheme and outline the management of the scheme.

Our objectives will be met by providing the following communications:

<b>Method of Communication</b>	<b>Media</b>	<b>Frequency of Issue</b>	<b>Method of Distribution</b>	<b>Audience Group</b>
Pension Fund Report and Accounts	Royal Borough's website	Annually	Electronic	All, on request
Pension Fund Committee Papers	Paper based and on Pension Fund website	As and when available	Electronic	All, on request

### **Explanation of communications**

## PENSION FUND COMMUNICATIONS POLICY STATEMENT

Pension Fund Report and Accounts – details of the value of the Pension Fund during the financial year, income and expenditure as well as other related details such as the current employing authorities and scheme membership numbers.

Pension Fund Committee Papers - formal documents setting out relevant issues in respect of the LGPS, in many cases seeking specific decisions or directions from elected members.

### 13. Policy on communication with the media

Our objectives with regard to communication with the media is to ensure accurate reporting of Fund's financial position and policy decisions

Our objective will be met by providing the following communications:

<i><b>Method of Communication</b></i>	<i><b>Media</b></i>	<i><b>Frequency of Issue</b></i>	<i><b>Method of Distribution</b></i>	<i><b>Audience Group</b></i>
Press releases	Paper based or electronic	As considered necessary	Post or email	Local or national press

### ***Explanation of communications***

Press releases – bulletins providing briefing commentary on the Royal Borough's opinion on various matters relating to the Pension Fund, for example. the actuarial valuation results.

### 14. Policy on communication with other stakeholders/interested parties

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

- meet our obligations under various legislative requirements
- ensure the proper administration of the scheme
- deal with the resolution of pension disputes
- administer the Fund's Additional Voluntary Contribution scheme

Our objectives will be met by providing the following communications:

## PENSION FUND COMMUNICATIONS POLICY STATEMENT

<b>Method of Communication</b>	<b>Media</b>	<b>Frequency of Issue</b>	<b>Method of Distribution</b>	<b>Audience Group</b>
Pension Fund valuation reports <ul style="list-style-type: none"> <li>• Rates and adjustment certificates</li> <li>• Revised rates and adjustment certificates</li> </ul>	Electronic	Every three years	Via email	Office of the Deputy Prime Minister (ODPM)/Her Majesty's Revenue and Customs (HMRC)/all scheme employers
Details of new employers entered into the Fund	Hard copy	As new employers are entered into the Fund	Post	CLG/HMRC
Formal resolution of pension disputes	Hard copy or electronic	As and when a dispute requires resolution	Via email or post	Scheme member or their representatives, the Pensions Advisory Service/the Pensions Ombudsman
Completion of questionnaires	Electronic or hard copy	As and when required	Via email or post	CLG/HMRC/the Pensions Regulator

### ***Explanation of communications***

Pension Fund Valuation Reports – a report issued every three years 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.

Details of new employers – a legal requirement to notify both organisations of the name and type of employer entered into the Fund (i.e. following the admission of third party service providers into the scheme).

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

Completion of questionnaires – various questionnaires that are received, requesting specific information in relation to the structure of the LGPS or the composition of the Fund.

## **15. Performance Measurement**

## PENSION FUND COMMUNICATIONS POLICY STATEMENT

So as 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:

<b>Communication</b>	<b>Audience</b>	<b>Statutory delivery period</b>	<b>Target delivery period</b>
Scheme booklet	New joiners to the LGPS	Within two months of joining	Within two weeks of joining the LGPS
Estimated Benefit Statements as at 31 March	Active members	On request	30 September each year
Telephone calls	All	Not applicable	95% of phone calls to be answered within 30 seconds
Issue of retirement benefits	Active and deferred members retiring	Within two months of retirement	100% of retirement benefits to be issued within 5 working days of retirement
Issue of deferred benefits	Leavers	Within two months of withdrawal	Within two months of leaving
Transfers in	Joiners/active members	Within two months of request	Within two months of joining
Issue of forms i.e. expression of wish	Active/Deferred members	N/A	Within five working days
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 Accounts	All	Within two months of request	Within five working days

### Quality

<b>Audience</b>	<b>Method</b>	<b>To consider</b>	<b>Notes</b>
Active and deferred members	Paper based survey with various communications	All services	



## **Results**

We will publish our performance in key targets in our annual report and accounts

## **16. Review Process**

We will review our communication policy at least every three years to ensure it meets audience needs and regulatory requirements. A current version of the policy statement will always be available on our website and paper copies will be available on request.