



The London Borough of Tower
Hamlets Pension Fund
Appendix 4
Communications Strategy Statement

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APPENDIX A – COMMUNICATION PLAN

Introduction

This is the communication strategy for the Tower Hamlets Pension Fund administered by London Borough of Tower Hamlets (the Administering Authority). Communication is at the heart of everything the Fund does and has a dedicated communication team in place to help the Fund meet its current and future communication challenges. This Policy provides an overview of how the Tower Hamlets Pension Fund will communicate with its full range of stakeholders. An effective communication strategy is vital for the Fund to meet its objective of providing a high quality and consistent service to the stakeholders.

The Fund has over 35 employers with contributing members and a total membership of over 22,000 scheme members, which are split into the categories below and with the approximate numbers of members in each category:

Type of membership	Type of Membership
Active scheme members	7,230
Deferred scheme members	7,993
Pensioner members	6,698

The policy outlines the Fund's strategic approach to communications. This Policy should be read in conjunction with the Communication Plan which is detailed in Appendix A of this document.

Vision

Everyone with any interest in the Fund should have readily available access to all the information that they require.

Regulatory framework

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

1. An administering authority must prepare, maintain and publish a written statement setting out its policy concerning communications with:
 - a) scheme members (active, deferred, retired and dependant)
 - b) representatives of scheme members
 - c) prospective scheme members
 - d) scheme employers
2. In particular the statement must set out its policy on:
 - a) the provision of information and publicity about the scheme
 - b) the format, frequency and method of distributing such information or publicity

- c) the promotion of the scheme to prospective scheme members and their employers.

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

Stakeholders of the Fund

The Fund has a varied audience of stakeholders with whom it communicates, including:

- Scheme members (active, deferred, pensioner and dependant members)
- Prospective scheme members
- Scheme employers
- Pension Fund staff
- Pension Fund Committee
- Local Pension Board
- Union Representatives
- London Collective Investment Vehicle (LCIV)
- External bodies:
 - Her Majesty's Revenue & Customs (HMRC)
 - Ministry of Housing, Communities and Local Government (MHCLG)
 - Trades Unions
 - Pension Fund Investment Managers, Advisers and Actuaries
 - Pension Fund Custodian
 - The Pensions Regulator (tPR)
 - The Scheme Advisory Board (SAB)
 - The Local Government Association (LGA)
 - Department of Work and Pensions (DWP)
 - Pension Officers Groups
 - Pensions and Lifetime Savings Association (PLSA)
 - Chartered Institute of Public Finance and Accountancy (CIPFA)
 - The Local Authority Pension Fund Forum (LAPFF)

Key objectives

To ensure that Fund delivers clear, timely and accessible communication with a broad range of stakeholders. To achieve this, the Fund will:

- Communicate information about the Scheme's rules and regulations in an effective, friendly and timely manner to the different groups of stakeholders.
- Communicate information about the investment decision made by the Fund.
- Inform customers and stake holders to enable them to make the decisions regarding pension matters.
- Inform customers and stakeholders about the management and administration of the Fund.
- Consult with key stakeholders on changes to policies and procedures that affect the Fund and its stakeholders;
- Support employers to enable them to fulfil their responsibility to communicate and share information with members in relation to the scheme.

- Seek continuous improvement in the way the Fund communicates.

Branding

As the Pension Fund is administered by London Borough of Tower Hamlets, all literature and communications will conform to the branding of the Council.

Accessibility

The Fund is committed to ensuring communications are accessible to all stakeholders and is committed to develop further use of electronic means of communicating through e-mail and internet site (including a Member Self Service Portal). Wherever possible, responses are sent to stakeholders by electronic means. However, more traditional methods of communications will continue to be offered as required.

The Fund also make sure that communications are easy to understand through use of Plain English accreditation and readability scores in line with Council policy.

Investment Communication

The Fund has seen an increase interest in its investments from Scheme Members, Scheme Employers and the wider public. The Fund maintains a large portfolio of assets, which it uses to pay out LGPS benefits when they become due. This is made up of pension contributions paid in by Scheme Members and Scheme Employers, and also any investment income and capital growth. To reduce risk, the Fund diversifies its investments across a wide range of assets both in the UK and Global market.

Responsible Investment

As a responsible investor the Fund Environmental, Social and Governance (ESG) issues are fundamental to the Fund's investment strategy. The Fund has focused communications to stakeholders about its investments. The Fund will regularly report to Scheme Employers and Scheme Members about its investments and the Fund's approach to ESG issues.

Freedom of Information

Anyone has a right under the Freedom of Information (FOI) Act to request any information held by the Fund which is not already made available. FOI requests will be dealt with openly and swiftly. Requests should be made in writing to the Freedom of Information Officer at the address at the end of this document

A fee may be charged and the Fund reserves the right to refuse if the cost of providing the information is disproportionately high.

Communication Channel

The table below shows the Fund main method of communication with different stakeholders.

Stakeholder	Communication	Key message /Objectives
Active members	<ul style="list-style-type: none"> • Annual benefit statements • Biannual Newsletters • Member self service • Website • Pensions team telephone line • Scheme Literature • Calculation and costings (e.g. estimates) • Presentations – face to face / online via Microsoft Teams • Promotion on internal systems, e.g. the Bridge • Active Member surveys 	<ul style="list-style-type: none"> • Your pension is a valuable benefit. • Your employer contributes to help you save for your retirement. • You need to make sure you're saving enough for retirement • To improve your understanding of how the LGPS works. • You understand the impact of any changes in legislation. • To advise scheme members of their rights and benefits. • To make pensions information more readily available. • To answer member's queries regarding their benefits • To give you more ways that you can contact us or get information. • To provide a method for members to give feedback.
Deferred members	<ul style="list-style-type: none"> • Annual benefit statements • Annual Newsletter • Member self service • Website • Telephone helpline • Scheme Literature • Calculation and costings (e.g. estimates) 	<ul style="list-style-type: none"> • Your pension is a valuable benefit • You are saving enough for retirement • You keep in touch with the Fund e.g. provide us with address changes • How the LGPS works now, and the impact of any changes in legislation • Understand the implication of transferring out of the scheme • To improve understanding of how the LGPS works • We will update you of any changes
Pensioner members	<ul style="list-style-type: none"> • Member self service • Pensions Increase letters 	<ul style="list-style-type: none"> • You keep in touch with the Fund e.g. provide us with address

	<ul style="list-style-type: none"> • P60 • Calculation and costings (e.g. estimates) • Website • Telephone helpline • Annual newsletter • Pensioner member Survey 	<ul style="list-style-type: none"> • changes • We are here to help with any questions you might have. • The LGPS is still a valuable part of your retirement package • How your funds are invested. • To improve understanding of how the LGPS works. • The impact of any changes in legislation. • The impact in the larger pension community (e.g. Brexit.)
Dependent members	<ul style="list-style-type: none"> • Member self service • Payslip • P60 • Calculation and costings (e.g. estimates) • Website • Telephone helpline 	<ul style="list-style-type: none"> • You keep in touch with the Fund e.g. provide us with address and bank changes. • We are here to help with any questions you might have. • The LGPS is still a valuable part of your retirement package. • The impact of any changes in legislation.
Scheme employers	<ul style="list-style-type: none"> • Ad hoc email alerts • Quarterly newsletters • Website • Webinars • Telephone helpline • Scheme information and guides • Annual Employer survey 	<ul style="list-style-type: none"> • You need to be aware of your responsibilities regarding the LGPS • Your employer contributes to help you save for your retirement. • You understand the impact of any changes in legislation • To improve relationships • Continue to improve the accuracy of data being provided to us
Potential Scheme Members including Opt Outs	<ul style="list-style-type: none"> • Website • Telephone helpline • Scheme information and guides 	<ul style="list-style-type: none"> • You understand the impact of any changes in legislation • Your employer contributes to help you save for your retirement. • The LGPS is still one of the best pension arrangements available • Increase understanding of how the scheme works and

		<p>what benefits are provided</p> <ul style="list-style-type: none"> •To improve take up of the LGPS
Pension Fund Staff	<ul style="list-style-type: none"> •Team meeting •1:1 / Appraisals •Training & development •Training Matrix •Ad hoc meetings •Monthly newsletter 	<ul style="list-style-type: none"> •Ensure staff are kept up to date with important information •regarding the service, the employing authority and the wider world of pensions as a whole •Management to feedback to staff regarding their individual progress •For staff to feel a fully integrated member of the team
Pension Fund Committee and Local Pension Board	<ul style="list-style-type: none"> •Committee/Board Papers •Trainings •Minutes •Presentations 	<ul style="list-style-type: none"> •Ensure members are kept up to date with important information regarding the Fund. •Monitor success against the agreed measures
External bodies	<ul style="list-style-type: none"> •Response to enquiries and consultations 	<ul style="list-style-type: none"> • Respond to enquiries/statutory requirements
Union Representatives	<ul style="list-style-type: none"> • Response to enquiries •Ad hoc meetings •Training & development • Scheme information 	<ul style="list-style-type: none"> • Respond to enquiries •Ensure Union Representatives remains as Pensions Committee member

Communicating with members

There are 3 categories of scheme member:

- Active members who are contributing to the Scheme.
- Deferred members who have left the Scheme, but have not yet accessed their pension benefits.
- Pensioner members who are in receipt of their LGPS benefits from the Fund.

The Fund recognises that communication with each category requires a different, specific approach and therefore uses a variety of methods to communicate with members.

To ensure members are able to access services easily, we employ a range of media to educate them about the LGPS and their pension benefits, delivered in a clear and easily understood way to ensure that members can make informed decisions about their benefits.

- Website - The Fund's dedicated Pensions website will go live in October 2021. www.towerhamletspensionfund.org/, which has general information about Tower Hamlets Pension Fund and about being a member of the LGPS. There are also scheme forms and guides available to copy or print.
- Telephone Helpline - We provide a helpline service for all our members to use if they need to contact us by telephone or email. There is a dedicated helpline for members to call [0207 364 4251](tel:02073644251).
- General Correspondence – The Fund provide a generic email address which enables members to email their queries. The emails are picked up and passed to the relevant member of staff pensions@towerhamlets.gov.uk
- Member Self Service - Members can access their pension account using the My Pension Portal. This is a secure area that allows members to see the personal details Fund holds about them. They can also update personal information. Contributing and deferred members can view their annual pension statements and pensioner members can view their pension payment information. There are also scheme forms and guides available to copy or print.
- Visits to our office - Members are welcome to visit our offices if they prefer to speak to us face to face. Ideally, members should make an appointment in advance so we can make sure that someone is available to see them. The Fund remains in operation during this time and members can contact us at the address at the end of this document
- Annual Benefit Statements – The Fund issues an Annual Benefit Statement (ABS) to all active members, showing the pension they have built up to the previous 31st March. They are subject to the members Scheme Employer

providing timely year end information to the Pensions Administration Team. The ABS are available for members to view on Member Self Service Pension Portal.

- Presentations / Roadshows / Drop in Sessions available to active scheme members.
- Newsletters - The Fund issues periodic newsletters to Members to update them on topical Pensions matters and changes.
- Pay advices, Pension Increase letters and P60s - We issue pay advices to pensioner members every March, April and May.

Communicating with Pension Fund Staff

The Fund recognises that its staff are its greatest resource and that they are kept informed about the Fund's aims to deliver a quality and accurate service. This is achieved via use of email, internal meetings, as well as internal and external training events on specific topics.

The Fund communicates with staff in a number of ways.

- Performance conversations— the Fund managers ensure that Fund staff have Performance Conversations at least twice yearly, these establish clear objectives and any necessary support that staff members and the team need. Staff members also meet with managers on a monthly basis (1-2-1).
- Training - Staff regularly attend LGA and CIPFA training as appropriate, and receive inhouse training from actuary, fund managers and via a dedicated Training Officer. Professional courses, such as CIPP are also offered on request. These are recorded via a staff skills matrix. Ad hoc training courses are produced as the LGPS regulations change.
- Staff Feedback on Fund Communications - Staff are encouraged to report back on any feedback given to them by other stakeholders.
- Weekly update – senior managers send weekly emails to keep staff updated on current issues.
- LGA bulletins - senior managers circulate monthly LGA bulletins to all staff to ensure staff are kept up to date with current LGPS issues.
- Team meetings – the Head of Pensions & Treasury meets with all staff on a monthly basis to keep staff updated on current issues including legislative issues.
- Quarterly Newsletters - keep staff updated on current LGPS legislation changes, new staff and those leaving and upcoming training courses, etc.

Communicating with the Pension Fund Committee and Local Pension Board

The administering authority, London Borough of Tower Hamlets, has established a Pensions Committee including elected Councillors to discharge the functions of the Council in governing and administering The Tower Hamlets Pension Fund. The Pensions Committee is the decision-making body for the Fund, and this includes responsibility for setting the Fund's investment strategy, appointing investment managers, and approving Fund budget, business plan and policies.

The Council also established Local Pension Board in 2015 to assist the Committee in securing compliance with the scheme regulations and the effective and efficient governance and administration of the LGPS.

The Pension Fund Committee and Local Pension Board communicate by:

- Committee and Board meetings - Members of the Pensions Committee and Local Board meet at least quarterly to discuss Pensions issues, following which the Local Board may make suggestions and recommendations, and the Pensions Committee may make decisions.
- Fund officer reports - Members of the Pensions Committee and Local Board receive monitoring reports from Fund staff. This includes the Fund's internal managers delivering reports and presentations to members at Committee and Board meetings.
- Investment Manager Reports – Members receive quarterly investment reports from the Fund officers, investment adviser and independent investment adviser on the performance of the Fund's investment.
- Training – An annual training plan is presented to Pensions Committee and Local Board to approve. Members receive regular training to ensure they have the knowledge and capacity to carry out their roles.
- Quarterly Update - Members of the Pensions Committee and the Local Board receive update from Interim Head of Pensions & Treasury on London CIV and Pension Administration.

Communicating with external bodies

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

- London Collective Investment Vehicle Pool, Pension Fund Investment Managers, Advisers and Actuaries – The Fund has regular meeting with:
 - London Collective Investment Vehicle (LCIV) and Independent Fund managers who make investments on behalf of the Fund.
 - Investment Advisers who provide help and advice on the investment strategy of the Fund.

- Fund Actuary to discuss Funding levels, employers' contributions and valuation of the liabilities of the Fund.
- Pension Fund Custodian - The Fund's Custodian is Northern Trust, who ensures the safekeeping of the Funds investment transactions.
- 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) - LAPFF is a collaborative shareholder engagement group representing most of the Local Government Pension Scheme Funds and UK Pension Pools, including London CIV Pool. Its aim is to engage with companies to promote the highest standards of corporate governance and corporate responsibility amongst investee companies.
- Mercer - The Fund had also Mercer as its Investment adviser.
- The Fund has appointed – Colin Robertson as its Independent Investment adviser.

Communicating with union representatives

The Fund's objective is to foster closer working relationships with union representatives. In doing so the Fund will ensure they are aware of the Pension Fund's policy in relation to any decisions that need to be taken concerning the scheme. To facilitate this, a union representative is Co-Optee a member of the Pensions Committee.

Data Protection

The Pension Fund has a duty to protect personal information and will process personal data in accordance with the Data Protection Act 1998 and any amendments to the act. 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 Actuary or AVC provider.

Review

The policy will be reviewed annually and updated sooner if the communications arrangements or other matters included within it merit reconsideration.

Further Information

If you have any queries about this Communications Policy please get in touch:

Pension Services
3rd Floor
Town Hall
Mulberry Place
5 Clove Crescent

London, E14 2BG
0207 364 4248
pensions@towerhamlets.gov.uk

If you have any Freedom of Information requests, please send them to:

Freedom of Information Officer
Information Governance
Town Hall
Mulberry Place
Clove Crescent
London, E14 2BG
020 7364 4161
foi@towerhamlets.gov.uk

Appendix A – Communication Plan

Method of Communication	Media	Frequency of Issue in Accordance with SLAs	Frequency of Issue in Accordance with Legislative Requirement	Method of Distribution	Audience Group
Send a notification of joining the LGPS to a Scheme Member – Contractual Enrolment	Electronic	Within 30 working days of receiving new starter information	2 months from date of joining the scheme	E-mail or Letter to Home Address where email not known.	New Members
Send a notification of joining the LGPS to a scheme member – Automatic Enrolment/Re-Enrolment	Various	Within 1 month of receiving jobholder information where the individual is being automatically enrolled/re-enrolled	Within 1 month of receiving jobholder information where the individual is being automatically enrolled/re-enrolled	Employer	New Members
Inform a member who left the Scheme of their leaver rights and options	Electronic	Within 40 working days from receipt of leaver information.	As soon as practicable and no more than 2 months from date of notification (from employer or from scheme member)	E-mail or letter to Home Address where email not known	Members leaving the scheme
Obtain transfer details for transfer in, and calculate and provide quotation to member	Paper Based or Electronic	Within 20 workings days from date of request	2 months from date of request	Letter to Home Address or Member Self Service	Active Member
Provide details of transfer value for transfer out, on request	Paper Based or Electronic	Within 20 workings days from date of request (CETV estimate or Divorce), unless there has already been a request in the last 12 months	3 months from date of request (CETV estimate)	Letter to Home Address, Member Self Service or IFA	Deferred Member

Provide a retirement quotation on request	Paper Based or Electronic	Within 15 working days from date of request	As soon as practicable, but no more than 2 months from date of request unless there has already been a request in the last 12 months	Letter to Home Address or Member Self Service	Active and Deferred Member
Notify the amount of retirement benefits	Paper Based or Electronic	Within 15 working days from receipt of all information	1 month from date of retirement if on or after Normal Pension Age (NPA), or 2 months from date of retirement if before NPA	Letter to Home Address or Member Self Service	Active and Deferred Member
Calculate and notify dependant(s) of amount of death benefits	Paper Based or Electronic	Initial letter sent no more than 5 days from date of becoming aware of death, and notification of benefit letter sent no more than 10 days from receiving correctly completed forms.	As soon as possible but in any event no more than 2 months from date of becoming aware of death, or from date of request by a third party (e.g. Personal representative)	Letter to Dependants Home Address	Dependant Member
Provide all Active and Deferred members with an Annual Benefit Statement (ABS) Member Self Service or Statement to Home Address	Paper Based or Electronic	By 31 August each year	By 31 August each year	Member Self Service or Statement to Home Address	Active and Deferred Member
Provide Pension Saving Statement to eligible members	Paper Based or Electronic	By 6 October each year	By 6 October each year	Letter to Home Address or Member	Active Member

				Self Service	
General Member Enquiries	Paper Based or Electronic	Within 15 working days		Email or Letter to Home Address	All Members
Pensions Increase Letters	Paper Based or Electronic	By 30 April each year	By 30 April each year	Member Self Service or Letter to Home Address	Pensioner Member
Pensioner P60s (HMRC requirement)	Paper Based or Electronic	By 31 May each year	By 31 May each year	Member Self Service or Letter to Home Address	Pensioner Member
Member Scheme Guide	Paper Based or Electronic	Always Available Online (Link also in New Starter Pack)	Within 2 months of request	Fund Website or Member Self Service	All members
Active Member Newsletters	Paper Based or Electronic	Spring newsletter by 1 April (in line with Annual Updates) and Autumn newsletter by 31 August (in line with ABS)		Member Self Service or Letter to Home Address	Active Member
Deferred Member Newsletters	Paper Based or Electronic	By 31 August in line with ABS		Member Self Service or Letter to Home Address	Deferred Member
Pensioner Member Newsletters	Paper Based or Electronic Paper Based or Electronic	By 30 April in line with Pension Increase Letter		Member Self Service or Letter to Home Address	Pensioner Member

Presentations/Roadshows	Paper Based or Electronic	Twice per year per or as required		Via Fund	Active Member
Drop In-Sessions	Face to Face	As requested, up to a maximum of 2 per year per Fund		Via Fund	Active Member
Material Alterations to Basic Scheme Information	Electronic	As soon as possible and within 3 months after the change takes effect	A soon as possible and within 3 months after the change takes effect	E-mail or letter to Home Address	All Members
Employer Training	Face to Face/Microsoft Teams	As requested		Via Fund	Scheme Employer
Employer Guides	Electronic	Online/On request		LGPS Regs Website	Scheme Employer
Briefing papers	Electronic	As and when required	As and when required	Email or Face to Face meetings	Union Representatives
Employer Newsletter	Electronic or Paper Based on Request	Half Yearly Newsletters		E-mail to Fund Contacts	Scheme Employer
Member, employer or third-party enquiries	Incoming via post	Workflow cases created based on enquiry type and associated SLA		Telephone Email	All Groups
Member Self Service	Electronic, Paper Based or Face to Face	Promotional events and campaigns to be discussed and agreed to promote sign up to Member Self Service.		Various	Active and Deferred Members
ISA19/FRS102 Accounting Reports	Electronic	Annually		E-mail	Scheme Employer

Annual General Meeting	Microsoft Teams/Face to Face	Provide availability to promote MSS at the AGM		Via Fund	All Groups
Pension Fund Report and Accounts	Electronic	Annually		E-mail	All Groups
Website					All Groups
Pensions Team Helpline					All Groups
Pensions Administration Strategy	Electronic	Always available (reviewed at least every 3 years)		E-mail	Scheme Employer
Pension Fund Valuation Report	Electronic	Triennially		E-mail	Scheme Employer