



# COMMUNICATIONS POLICY STATEMENT MAY 2019



West Midlands Pension Fund

## BACKGROUND

The West Midlands Pension Fund (“The Fund”) is one of the UK’s largest pension funds managing and administering the pension interests of over 320,000 members and more than 650 scheme employers as at 31 March 2019. It is administered by the City of Wolverhampton Council on behalf of all West Midlands local authority bodies.

Our core mission is to ensure that our members receive their pension benefits when they fall due, contributing together for our members’ future. Through increasing dialogue with our customers on the Local Government Pension Scheme (LGPS), its membership and benefits, the West Midlands Pension Fund carries out its role as administering authority in partnership with employers playing a key role in enabling employers to meet their statutory obligations assisting members’ planning their retirement.

This Communications Policy Statement outlines how the Fund will communicate with its members and employers ensuring information is provided in a clear and concise way, readily available to our customers when they need it.

In April 2006, the Local Government Pension Scheme regulations were amended to state that each pension fund administering authority is required to prepare, publish and review regularly its communications policy statement, the regulations outline what funds are required to publish.

This document outlines the Fund’s communications policy in line with that requirement and covers the following categories in our regular communication activity:

- 1 Communicating with scheme members;
- 2 Member self-service (the Pensions Portal);
- 3 Communicating with members’ representatives;
- 4 Communicating with prospective members;
- 5 Communicating with employing authorities;
- 6 Customer engagement strategy.

## 1 COMMUNICATING WITH SCHEME MEMBERS

The Fund has adopted a Customer Engagement Strategy setting out the opportunities for communication with members and employers, as well as outlining opportunities for individuals to engage directly with the Fund at various stages of the pension lifecycle.

While the Fund can choose its engagement opportunities, there are a number of statutory communications which the Fund is required to provide and publish to its members. This strategy sets out how the Fund responds to that statutory requirement of communicating with members.

### **Annual Benefit Statement**

An annual benefit statement is made available online for all active and deferred members who are contributing to the Fund or have not received payment of their deferred benefits at the previous financial year. These statements are made available through the Fund's pensions portal self-service facility. Benefit statements can be issued in paper form on written request.

If there is an instance where a benefit statement cannot be made available, we will notify members and their employers by letter, setting out the reason for the inability to produce a statement.

### **wmpfonline.com**

The Fund maintains an extensive online resource at [wmpfonline.com](http://wmpfonline.com) containing information about the scheme and the details about the current activities of the Fund. There are also links to other relevant partner organisations.

### **Scheme Literature**

An extensive range of scheme literature is produced and updated by the Fund for all categories of member. Copies of scheme literature are made available at the Fund's website, [wmpfonline.com](http://wmpfonline.com) with direct links to the national LGPS member site [www.lgpsmember.org](http://www.lgpsmember.org)

### **Telephone Helpline: 0300 111 1665**

A dedicated low-call rate telephone customer service telephone line is provided for scheme members and is publicised in all outgoing communications.

### **Pension Roadshows**

Throughout the year there may be changes to scheme benefits or the regulations which determine scheme benefits which are legally required to be communicated to members. This is known as 'disclosure'.

The Fund complies with its statutory duty to provide details and information to members that affects the calculation and/or their entitlement to access their pension benefits through publication of documents, information leaflets and where necessary, direct mailings to members affected by the changes.

### **Pensioner Pay Advice Slip and Annual Newsletter**

All Fund members in receipt of a pension receive a combined pay advice slip and P60 in April of each year. In the months of May through to March, we will only send a pay advice slip when there is a variance of £10 in their gross or net payment. For scheme pensioners that are paid quarterly and annually, the Fund will issue a pay advice every time a payment is made (June, September, December and March).

Scheme pensioners can also register to use the Fund's pensions portal where pay advice information can be viewed electronically and printed at any time following the payment date.

Mailed with the April combined pay advice slip/P60 is an annual newsletter providing updates on the Fund and its performance.

Members are still able to receive monthly and hard copy payslips by writing into the Fund to request copies.

## 2 MEMBER SELF-SERVICE (THE PENSIONS PORTAL)

An online portal gives members secure access to their LGPS records.

The facility provides members with the opportunity to update their personal details, ask questions about their benefits, view annual benefit statements and run pension estimate calculations as well as change nominations. Members in receipt of a pension are also able to view and change UK bank details via the portal.

## 3 COMMUNICATING WITH MEMBERS' REPRESENTATIVES

Materials available to members are also available on request to their representatives or through [wmpfonline.com](http://wmpfonline.com)

In compliance with the data protection laws, the Fund is unable to communicate with family members unless authority has been received from the member. The Fund is also unable to communicate with third parties such as financial advisors or solicitors with express consent. For more information on third party access to information and how the Fund manages data in line with data protection, please visit [www.wmpfonline.com/dataprotection](http://www.wmpfonline.com/dataprotection)

## 4 COMMUNICATING WITH PROSPECTIVE MEMBERS

### **Scheme Booklet and Website**

Upon appointment with their employer, all prospective scheme members will be provided with a link to the Fund's website where they can access scheme booklets. The website also provides information to help members make an informed decision about contributing to the LGPS, the 50:50 scheme and how to opt out of the scheme.

### **Corporate Induction Courses**

Fund officers will attend employer induction events to present to prospective scheme members the benefits of being a member of the LGPS.

### **Trade Unions**

We work with the trade unions to ensure the scheme is understood by all interested parties. Training days for branch officers can be provided upon request, and the Fund ensures that all pension-related issues are communicated effectively with the trade unions through their representative on the Pensions Committee and Local Pensions Board.

## 5 COMMUNICATING WITH SCHEME EMPLOYERS E-NEWSLETTER

### **e-Newsletter**

An electronic newsletter, entitled Employer's Briefing Note is issued on a bi-monthly basis to all employers. This is used to communicate the activities of the Fund and inform of any regulatory changes which may impact on the employer's function or their members' pension benefits.

### **wmpfonline.com and Employer Hub**

The Fund maintains a dedicated area of its website for scheme employers containing news, learning materials and other electronic resources.

Each employer can request to join the Fund's employer hub. This allows them secure access to the membership details of their current employees. The hub provides employers with the ability to make changes to member records including working hours and personal details. The portal also provides the facility to calculate early retirement estimates and any associated early retirement costs.

### **Dedicated Telephone Helpline: 0300 111 6516**

A dedicated low-call rate employer customer service line is provided for scheme employers. This allows the Fund to respond to employer generated telephone calls at peak times.

### **Annual General Meeting and Mid-Year Review for Employers**

The Fund invites each employer to our annual general meeting each winter. This event is used to communicate strategic issues, performance, legislation changes and triennial valuation matters. In addition to this, the Fund also holds a mid-year employer event each summer where employers are kept up to date with important issues through presentations and roundtable discussions.

### **Employer Peer Group**

A group consisting of a cross-section of Fund employers meet quarterly to provide feedback on the communication initiatives planned by the Fund for fellow employers.

## 6 PROSPECTIVE EMPLOYERS

The Fund's Employer Services team works with new and prospective employers to help their understanding of their obligations under the LGPS Regulations. The team liaise with new employers to produce the necessary admission agreements providing confirmation of their duties as a new scheme employer through coaching sessions and 1-2-1 engagement via the employer helpline.

## 7 CUSTOMER ENGAGEMENT STRATEGY

In line with the Fund's objectives, the Customer Engagement Strategy plays a key role in ensuring the Fund drives continuous improvement and develops working practices, systems and process which are informed and prioritised according to the needs of our customer base.

We actively engage with our customers to keep them informed about the scheme, the performance of the Fund in the delivery of its services, ensuring these meet both the legal and regulatory duty of scheme administration as set out in The Pension Regulator's Code of Practice, and the Fund's own objectives for service development.

Our success is dependent on building and maintaining good working relationships with our employers and scheme members and this strategy aims to ensure customer focus is embedded in Fund operations and exhibited in our behaviours.

Our strategy outlines:

- a) Our aims and objectives
- b) our values and behaviours
- c) Our customers and stakeholders
- d) How our customers can engage with the Fund

Our Customer Engagement Strategy is updated annually and is available from [wmpfonline.com/corporateinfo](http://wmpfonline.com/corporateinfo)

## 8 CUSTOMER FEEDBACK POLICY

### **Customer Feedback**

When seeking feedback, the Fund encourages contact through every available medium and will address any comments, compliments or complaints received in any form.

Contact may be made through our customer helpline, verbally on the phone, by letter, email or through feedback forms from one of our events or roadshows.

We also host a feedback form on our website: [wmpfonline.com](http://wmpfonline.com)

### **Exceptions**

While the Fund will always try to address any contact received from customers, there may be occasions where we will not be able to deal with the query under this process, either because it is covered by a different policy or because we are unable for reasons of business/commercial sensitivity.

The types of areas that we won't deal with through this process include the following:

- Staff/ex-staff complaints about employment matters including grievances or disciplinary hearings.
- Cases where legal action has started.
- Questions or comments that might lead to the release of commercially sensitive information (where this applies the customer will be informed this is the reason).
- Complaints about trustees or Pensions Board members.
- Where the matter is already being dealt with another way.

The Fund will offer support and assistance to anyone wanting to provide feedback on our services and where it is not deemed appropriate to deal with the feedback under this policy; we will try to assist by directing them to a more appropriate channel or procedure.

## **Process: Complaints**

When dealing with complaints the Fund will always try to resolve a customer's comments in the first instance. However, we understand that sometimes customers may feel that the response they receive does not address their concerns.

Where we have made a mistake, we will always try to put it right and the way we might do this includes:

- making an apology;
- providing a full explanation of the circumstances that lead to the mistake;
- reviewing our procedures to ensure they are as effective as possible, achieving what they are designed to achieve;
- identifying training needs among staff.

## **What Will Happen to Your Complaint?**

To ensure a fair and balanced approach, the Fund has created a three-stage complaints process, each of which progressing in escalation.

Under each process, the investigating officer is required to highlight any potential training needs or staff development opportunities feeding this back to the manager for the service area involved.

### **Informal Process**

Where possible, the Fund will always deal with complaints at the first point of contact. Often customers contact the Fund via our helpline and it is the responsibility of our call handlers to ensure customers calling to complain are given every opportunity to explain their concerns. Call handlers will try and resolve the matter at this point reducing the need for further action.

There will be times when our call handlers are unable to resolve a query raised or the customer requires a further explanation. Where this occurs, the formal complaints process will begin and the matter will be formally logged as a complaint and passed to the Fund's Regulatory Compliance Team.

### **Stage One**

Where a complaint cannot be resolved in the first instance or is received via email/letter/written correspondence, this will start the Stage One process which requires the person receiving the complaint to notify the Fund's Customer Services Manager. The complaint will be logged on the central system.

The complainant will receive an acknowledgment that their correspondence has been received and is being reviewed by the Fund's Customer Services Manager.

When investigating the complaint, the Fund officer will speak to staff members involved and, where necessary, review members' records.

A response will be issued within 15 days of receiving the complaint. Should this deadline need to be extended in order to provide the opportunity for further investigation, the complainant will be notified before the 15-day deadline.

### **Stage Two**

Where a complaint cannot be resolved under Stage One or the complainant believes their concerns have not been adequately addressed, the matter will progress to Stage Two.

When a complaint progresses to Stage Two, it will be investigated by a senior manager at the Fund, usually the Head of Governance, who will review the complaint, review the response provided under Stage One and consider whether the issue has been addressed.

As with Stage One, an acknowledgment will be sent to the complainant confirming their complaint is being considered under the Stage Two process and a full response issued within 15 days.

### **Stage Three**

Should a complaint not be resolved under Stage One or Stage Two, and a member or employer wants to progress further with their complaint, the matter will then progress to Stage Three where the complainant has a right to ask the Director of Pensions to review their complaint and the responses received.

There may be occasions where a complaint details an event or a circumstance that suggests something has happened that is so serious, it will progress automatically to the Stage Three process.

Under Stage Three, the Director will review all correspondence relating to the complaint and will conduct an investigation as to whether all appropriate action has been taken.

A response will be issued within 21 days.

### **Local Government Ombudsman**

Stage Three is the final stage of the Fund's complaints process. Should a complainant remain unhappy with the response received, they do have a right of appeal to The Local Government Ombudsman.

The Local Government Ombudsman does not usually investigate or respond to complaints unless the in-house process has been exhausted. Complainants will therefore need to progress through all three stages of the Fund's complaints process before the Ombudsman will become involved.

The Ombudsman may be contacted at the address below:

### **Local Government Ombudsman**

PO Box 4771

Coventry

CV4 0EH

Tel: 0300 061 0614

Website: [www.lgo.org.uk](http://www.lgo.org.uk)

### **The Pension Regulator**

The Public Service Pensions Act 2013 gave additional powers to The Pensions Regulator for the oversight of local government pension funds.

They may be contacted via their website at [www.thepensionsregulator.gov.uk](http://www.thepensionsregulator.gov.uk)

**Internal Dispute Resolution Process (IDRP)**

The Fund is required to have in place an internal dispute resolution process for responding to complaints from members which relate to:

- a) their entitlement to join the scheme;
- b) benefit entitlement on leaving the scheme; and
- c) an employer deciding not to exercise a discretion to waive a reduction for deferred members over 55.

This is a different process to the Fund's feedback process, which is designed to deal with complaints concerning the Fund's failure to comply with its own adopted service standards.

IDRP is a complaint regarding a member's statutory right to pension benefits and more information can be found on the Fund's website [wmpfonline.com](http://wmpfonline.com)

**Officer Contacts****Customer Services Manager**

[pensionfundenquiries@wolverhampton.gov.uk](mailto:pensionfundenquiries@wolverhampton.gov.uk)

**Employer Services**

[wmpfemployerliaison@wolverhampton.gov.uk](mailto:wmpfemployerliaison@wolverhampton.gov.uk)

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