

NiLGOSC

NORTHERN IRELAND LOCAL GOVERNMENT OFFICERS'
SUPERANNUATION COMMITTEE



COMMUNICATION POLICY 2018

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Background

Introduction

NILGOSC is required under Regulation 67 of the Local Government Pension Scheme (Administration) Regulations (Northern Ireland) 2014, as amended, to prepare, maintain and publish a written statement setting out its policy concerning communications.

Regulatory Requirement

This policy outlines how NILGOSC will communicate with members, representatives of members, prospective members and employing authorities.

In particular, the policy will cover the provision of information and publicity of the Scheme; the format, frequency and method of distributing such information or publicity; and the promotion of the Scheme to prospective members and their employing authorities.

Communication Aims

NILGOSC has six key aims for all of its communications. That they are:

- Clear and easy to understand
- Accurate
- Timely
- Targeted/appropriate to user
- Accessible
- Proactive

These aims will ensure that all members, prospective members, representatives of members and employing authorities have the information they require to fully understand and participate in their pension scheme.

All print and electronic communications are designed with full consideration for those with additional needs. To ensure that all members can access our services, communications can be requested in audio, large print and Braille format. Documents can also be provided in minority languages for those whose first spoken language is not English, on request, where reasonably practical. Where the exact request can not be met we will ensure that a reasonable alternative is provided.

Members

Membership Pack

Each new Scheme member receives a Membership Pack, sent directly to his or her home address, containing:

- a Membership Certificate;
- an Expression of Wish form for Death Grant purposes (LGS20);
- a Transfer of Benefits Request form (LGS8);
- a Public Service Pension History form (LGS10);
- information detailing how to sign up for email communications;
- a welcome letter directing members to the NILGOSC website (www.nilgosc.org.uk) where they can download the following information;
 - an Increasing your Retirement Benefits booklet;
 - a Member Guide to the Local Government Pension Scheme booklet;
 - an Equality Scheme Summary booklet detailing the Committee's commitment to equality of opportunity and the promotion of good relations with all its stakeholders; and
 - an Alternative Methods of Communication leaflet for members with communication difficulties e.g. impaired hearing, sight, language etc.

Members', Deferred Members' and Pensioners' News

Members, deferred members and pensioners are sent a newsletter each year, either to their home or email address, giving an update on any important pension matters which may affect their prospective or actual pensions and showing an abbreviated version of the Annual Accounts to the previous March.

Annual Benefit Statements

Members are sent a benefit statement before the end of August each year to their home addresses showing current and prospective pension benefits based on their pay rate at the previous 31 March. NILGOSC is proud to have been the first public sector scheme in Northern Ireland to have produced Annual Benefit Statements from 31 March 1983, long before legislation made it compulsory for these statements to be issued. Deferred members are sent a statement each year to their last known addresses showing the current value of their benefits to include the pensions increase in April.

Scheme Literature

NILGOSC produces a comprehensive range of Scheme literature which is supplied to Scheme members. Where documents are issued to members by signposting to a link on the NILGOSC website, hard copies will also be available on request. The Scheme literature for members is shown below:

Communication Material	Paper Based	Electronic Format (pdf)	Website	Frequency
NILGOSC Pension Guide: Local Government Pension Scheme (NI)	✓	✓	✓	Initially on joining from employer, then constantly available
Member Guide to the LGPS (NI)	✓	✓	✓	Website link sent in the welcome letter when joining, issued on request, constantly available
Retirement Guide to the LGPS (NI)	✓	✓	✓	Initially on retirement, then constantly available
Increasing your Retirement Benefits guide	✓	✓	✓	Website link sent in the welcome letter when joining, issued on request, constantly available
Leaving the LGPS (NI) Before Retirement	✓	✓	✓	Initially when a member becomes deferred, then constantly available
Alternative Communications leaflet	✓	✓	✓	Website link sent in the welcome letter when joining, issued on request, constantly available
Decisions, Reviews and Complaints leaflet	✓	✓	✓	Issued with any response of a decision which has been made, then constantly available
Re-Joining the Scheme leaflet	✓	✓	✓	Issued to members who re-join the Scheme, then constantly available
Equality Scheme Summary	✓	✓	✓	Website link sent in the welcome letter when joining, issued on request, constantly available

Website

The Scheme's website <http://www.nilgosc.org.uk> contains sections specifically for:

Members; Deferred Members; Pensioners; Councillors; Prospective Members; and Employers. The site is continually updated with new information and mailings and contains all scheme documentation and guides. The site also contains information about NILGOSC the organisation for all its stakeholders including the Public.

Social Media

NILGOSC has a Twitter account which it uses to update followers with any new information or changes to the Scheme.

Pensioner Pay Advice Slips and P60s

Pay advice slips are issued to all NILGOSC pensioners in April and May each year. Pay advice slips are also issued to pensioners whose pension changes by £1.00 or more in any other month, and to pensioners who have specifically requested a monthly pay advice slip. Urgent messages can also be related to pensioners on the pay advice slip and it is a useful additional means of communication. P60s are sent to pensioners' home addresses each year before the 31st May.

Telephone/Email/Fax/Postal Communication

The scheme utilises the following methods of communication which are available to all scheme members.

Post: NILGOSC
Templeton House
411 Holywood Road
Belfast
BT4 2LP

Fax: 0345 3197 321

Email: info@nilgosc.org.uk

Telephone: 0345 3197 320

Pensioners' Helpline: 0345 3197 326

Typetalk: 18001 0345 3197 320
(For people using a textphone)

Members Seminars/Meetings

NILGOSC staff are available to present staff induction, pre-retirement and general information seminars at the employers' locations, NILGOSC premises and third party locations. Seminar content and location are geared to the requirements of the member and employer. The Communications Officer or Employer Liaison Officer can be contacted to organise seminars, using the methods set out above.

Members may call at the NILGOSC office without an appointment to discuss their pension.

Annual Satisfaction Survey

Members are contacted on a random selection basis each year and asked to give their opinions on pensions and related topics and their degree of satisfaction with NILGOSC. The results are published in the Annual Report and on the website.

Representatives of Members

NILGOSC Management Committee and Pension Board

The Management Committee and Pension Board of NILGOSC includes five representatives nominated by employees' organisations who represent the views of Scheme members.

The NILGOSC website and annual report has a section regarding the Committee including its responsibilities and membership.

Departmental Circulars

The Department for Communities sends employers, Trade Unions and other relevant stakeholders advance notice of any legislative changes to the Local Government Pension Scheme Regulations for consultation within their organisations and response to the Department for Communities.

Seminars and Briefings

NILGOSC staff regularly present seminars for Trade Union organised staff briefings or representative groups, as required.

Scheme Literature

All of members' communication listed above is available to representatives of members on request, with the exception of personal information.

NILGOSC Circulars

NILGOSC will send circulars regarding potential scheme changes that may affect members to Trade Unions.

Prospective Members

NILGOSC Pension Guide and Member Guide

The NILGOSC Pension Guide and Member Guide are available to all employers to send to prospective employees or current employees not in the Scheme.

General Scheme literature

All Scheme literature is available to prospective members on request.

Website

The NILGOSC website is available to prospective members and non-joiners and there is a dedicated section for them on the site.

Seminars

NILGOSC staff, on request, conduct induction seminars for new employees of Scheme employers.

Automatic Enrolment

All employees who are automatically enrolled into the LGPS (NI) are sent a new member pack containing all of the required Scheme literature (see page 5).

Employing Authorities

Employers' Guides and Literature

Communication Material	Paper Based	Electronic Format (pdf)	Website	Frequency
The Employers' Guide		✓	✓	Website link sent in the admissions letter and then constantly available
Employers' Guide to Automatic Enrolment		✓	✓	constantly available
Human Resources Guide to the LGPS (NI)		✓	✓	Website link sent in the admissions letter and then constantly available
Payroll Guide to the LGPS (NI)		✓	✓	Website link sent in the admissions letter and then constantly available
Pension Administration Strategy	✓	✓	✓	On joining and then constantly available
Circulars		✓	✓	As appropriate
Employer E-Newsletters		✓	✓	As appropriate

The Employers' Guide details those procedures to be adopted by employers to enable them to effectively carry out their pension administration functions. The guide is regularly updated.

Regular circulars are sent by email to employing authorities and posted on the website to include any regulation updates, Annual Return instructions, guidance for completion of new forms and other items of interest to employers.

The introduction of the Pension Administration Strategy has replaced NILGOSC's Service Level Agreements and will apply to all employing authorities in the Scheme. The purpose of the Strategy is to highlight the responsibilities of NILGOSC and the Scheme's

employing authorities when carrying out their respective Scheme functions. The Strategy sets out the service standards and targets for both NILGOSC, as the Scheme administrator, and for Scheme employers.

Website

A full section for employers is available on the NILGOSC website. This includes relevant mailings, guides, forms and regulations.

Social Media

NILGOSC has a Twitter account which it uses to update followers with any new information or changes to the Scheme.

Employer Seminars and Training

NILGOSC has a dedicated Employer Liaison Officer who is available to present employer training and general information seminars at the employers' location, NILGOSC premises and third party locations. Seminar content and location are geared to the requirements of the employer.

NILGOSC staff are also available to instruct newly admitted employers' staff on scheme administration and form filling responsibilities.

Employers' Database

An extensive employers' database is held by NILGOSC holding contact details, authorised signatories, discretionary policy statements and other relevant information.

Email Alerts

NILGOSC's preferred method of communication with employers is by email to those registered and recorded on the database.

Mailings

Employers can request Scheme guides and literature for their employees.

Education Authority Communication Forum meetings

NILGOSC staff meet twice a year with HR, payroll and IT project group staff from the Education Authority regions. The purpose of the meetings is to promote effective communication and administration, and to discuss emerging and forthcoming issues.

Ad Hoc Meetings

Ad hoc meetings can be arranged at any time by either NILGOSC or employers to discuss important topics outside of normal pension related communication, e.g. Actuarial Valuation updates and results.

Employers' Satisfaction Survey

An annual survey is sent to all employers to ascertain their opinions on relevant matters and their degree of satisfaction with NILGOSC's administration. The results are published in the Annual Report and the Scheme website.

Internal Staff Communication

NILGOSC recognises that one of its greatest assets is its professional and well-trained staff and is committed to developing every employee to his/her full potential. The following communication tools are in place to continually improve the capacity of staff to communicate effectively and to understand the importance of good communications:

- A structured induction programme is in place for all new staff;
- Both general and Scheme specific training is provided to all staff as and when required;
- An annual appraisal of staff is undertaken to discuss an employee's performance over the year and agree their objectives and training requirements for the coming year;
- Managers are encouraged to hold regular meetings with staff to discuss current topics and sectional administration;
- Regular staff 'away-days' are held to provide a forum for sharing ideas and improving teamwork and communication.
- Each member of staff has access to email and the scheme's intranet which contains copies of all key documentation including the NILGOSC in-house staff magazine "Templeton Times";
- Briefings and in-house seminars are held on a regular basis to ensure staff are fully informed of current and future developments in the pensions industry and related topics;
- The complete "Staff Handbook" is posted on the staff intranet along with various policy statements relating to employment matters.
- The Staff Forum meets on a quarterly basis to discuss any issues that have been brought to their attention. There is a dedicated email inbox staff.forum@nilgosc.org.uk which staff can use to raise any suggestions/issues that they would like the Staff Forum to look at.

Communication with Other External Bodies

Trade Unions

Trade Unions have five places on the NILGOSC Management Committee and are valued ambassadors for the Local Government Pension Scheme in Northern Ireland.

Trade Unions are consulted on regulation amendments by the Department for Communities.

On request, NILGOSC staff will attend briefings with Trade Union officials on pension legislation affecting their membership

Prudential - Additional Voluntary Contributions (AVCs)

Regular contact is maintained with NILGOSC's AVC provider, Prudential, to ensure the smooth operation of administrative systems.

AVC statements are forwarded annually to contributors' home addresses. This statement details their investments and AVC contributors are advised by letter, as and when required, of any changes which may affect their investments.

Department for Communities

Regular contact is maintained with the Department on matters regarding Local Government Pension Scheme legislation. NILGOSC is consulted on future changes to the scheme and all relevant information is passed on to employers and members in the usual formats.

Department for Work & Pensions (DWP)

NILGOSC communicates regularly with DWP for all matters concerning previous contracted-out employment for Scheme members.

Her Majesty's Revenue & Customs (HMRC)

HMRC sets the limits for tax relievable pensions saving. Regular contact is maintained principally through their electronic data transference service "Pension Schemes Online". Any changes to legislation are passed on to employers and members in the usual formats.

Seminars and Working Groups

NILGOSC staff regularly attend seminars, conferences, and working groups, including the Local Government Technical Group meetings and the Northern Ireland Public Sector Pension Group. Notes on these events are reported in the "Templeton Times" on the staff intranet.

National Fraud Initiative

NILGOSC is required by law to protect the public funds it administers. It may share information provided to it with other bodies responsible for auditing or administering public funds, in order to prevent and detect fraud.

The Local Government Auditor audits the accounts of NILGOSC and the Comptroller and Auditor General (C&AG) is responsible for carrying out data matching exercises under his powers in Articles 4A to 4G of the Audit and Accountability (Northern Ireland) Order 2003.

Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This is usually personal information. Computerised data matching allows potentially fraudulent claims and payments to be identified. Where a match is found, it may indicate that there is an inconsistency which requires further investigation. No assumption can be made as to whether there is fraud, error or other explanation until an investigation is carried out.

NILGOSC is required to participate in the National Fraud Initiative (NFI) data matching exercises to assist in the prevention and detection of fraud and provides particular sets of data to the C&AG for matching. Details are set out in the Northern Ireland Audit Office's website, www.niauditoffice.gov.uk.

The use of data by the C&AG in a data matching exercise is carried out with statutory authority. It does not require the consent of the individuals concerned under the Data Protection Act 1998. However, data matching by the C&AG is subject to a Code of Data Practice, which can be found at www.niauditoffice.gov.uk.

For further information on the C&AG's legal powers and the reasons why he matches particular information, see the Level 3 Fair Processing Notice on the Northern Ireland Audit Office's website at www.niauditoffice.gov.uk.

General

Freedom of Information

As a public body, NILGOSC complies with the Freedom of Information Act 2000. NILGOSC's Freedom of Information Publication Scheme is published on the NILGOSC website and sets out the information that it will routinely publish and how it will do so. The classes of information to be published are set out under defined headings which reflect the categories of information provided by NILGOSC. The Publication Scheme also provides details of how to make a request for information that is not published.

Data Protection

NILGOSC is a Data Controller under the EU General Data Protection Regulations and UK data protection law. This means we store, hold and manage your personal data in line with statutory requirements to enable us to provide you with pension administration services. To enable us to carry out our statutory duties, we are required to share your information with certain bodies, but will only do so in limited and specified circumstances. For more information about how we hold your data, who we share it with and what rights you have to request information from NILGOSC, please refer to the Privacy Notice for Members and Scheme Beneficiaries, available on our website at www.nilgosc.org.uk/data-protection.

Requests in relation to accessing your personal data or exercising any other rights under data protection legislation should be made in writing or via email to the Data Protection Officer at NILGOSC at governance@nilgosc.org.uk.

Special Requirements

NILGOSC is committed to providing equality of access to services for all members and employers. The following means of communication are currently used:

Writing: Our guides, leaflets, letters and statements

Correspondence can be posted or delivered to:
NILGOSC
Templeton House
411 Holywood Road
Belfast
BT4 2LP

Telephone: 0345 3179 320

Pensioners' Helpline: 0345 3197 326

Typetalk: (For people using a textphone)
18001 0345 3197 320

Fax: 0345 3197 321

In Person: At the above premises

Email: info@nilgosc.org.uk

Website: www.nilgosc.org.uk

In addition, NILGOSC provides documents in alternative formats. These include audio, large print and Braille versions for people with sight problems. Documents can also be provided in minority languages for those whose first spoken language is not English.

Interpreters for sign language or spoken language can also be used for meetings if necessary. The member can request their own interpreter or NILGOSC can provide one for them.

After discussions with Mencap it was agreed that an easy read version of Scheme literature would not be suitable due to the complex nature of pensions. As an alternative, individuals with learning difficulties or difficulty understanding pension literature will be offered face-to-face meetings where information can be explained on a one-to-one basis.

Feedback

It is essential that NILGOSC receives feedback on the services it provides and that includes the communications that it distributes. NILGOSC welcomes comments and feedback from Scheme members, Scheme employers, prospective members and other interested parties. The mechanisms for feedback include direct communication with the Scheme administrators using the various formats as previously listed and responses to the annual satisfaction surveys.

Review

This statement will be revised and published by the Committee following such material change in its policy towards:

- The provision of information and publicity about the Scheme to members, representatives of members and employing authorities; or
- the format, frequency and method of distributing such information or publicity.

Reviewed: November 2018

Next Review Due: March 2019