

Communications policy statement



Introduction

The Environment Agency Pension Funds (EAPF) are part of the Local Government Pension Scheme (LGPS), and the Active Fund has three employers – the Environment Agency (EA), Natural Resources Wales (NRW) and Shared Services Connected Limited (SSCL).

The Active Fund is open to all members of the Environment Agency and to those employees of NRW and SSCL who transferred from the EA on their relevant vesting day. It has 13,874 contributing members, 8,419 deferred members and 8,479 pensioners.

The Closed Fund exists solely for the purpose of paying pensions and related benefits of a group of former employees in the water industry in England and Wales who did not transfer to one of the Privatised Water Companies' schemes in 1989. It has no contributing members, 592 deferred members and 8,766 pensioners. This Communications Policy Statement is effective from 26 June 2024.

We're continuing to develop our strategy to increase digital interaction with members. Our active and deferred members now receive all communications electronically. We have also developed our online member portal in May 2024 to improve security with the use of Multi Factor Authentication. In addition, this development has improved functionality with the use of a 2-way mailbox where members can send forms and documents securely through the portal. These developments are reflected in this policy statement.

Our website www.eapf.org.uk provides a knowledge centre for members. Further information with details of any employer related aspects of pensions such as policies on contributions, the use of discretions etc can be found on our Fund employer's respective intranets.

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

Pension Fund Management
Horizon House
Deanery Road
Bristol, BS1 5AH
Email: info@eapf.org.uk

Objectives

We have identified a number of key objectives relating to how we communicate with our stakeholders, and these are:

- Communicate in a clear, concise manner using Plain English
- Promote the Scheme as a valuable benefit and provide information so members can make informed decisions about their benefits
- Provide a service that is valued by all members, responding to their personal circumstances and supports them in their decision making process
- Ensure we use the most appropriate means of communication, taking into account the different needs of different stakeholders
- Provide an accessible website and make alternative versions of all documents available on request
- Look for efficiencies in delivering communications through greater use of technology and partnership working
- Regularly evaluate the effectiveness of communications and shape future communications appropriately

Regulatory framework

With effect from 1 April 2014 regulation 61 of the Local Government Pension Scheme Regulations 2014 (as amended) required that administering authorities "...prepare, maintain and publish a written statement setting out their policy concerning communications with members; representatives of members, prospective members and Scheme employers.

Regulation 59 of the Local Government Pension Scheme (Administration) Regulations 2014, effective from 1 April 2014, states:

This regulation applies to the written statement prepared and published by an administering authority under regulation 61 of the Local Government Pension Scheme Regulations 2014.

In particular the statement must set out its policy on-

- the provision of information and publicity about the Scheme to members, representatives of members and Scheme employers;
- the format, frequency and method of distributing such information or publicity; and
- the promotion of the Scheme to prospective members and their employers.

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

As a provider of an occupational pension scheme, we are also obliged to satisfy the requirements of the Occupational Pension Schemes (Disclosure of information) Regulations and other legislation, for example the Pensions Act 2004.

The disclosure requirements are prescriptive, concentrating on time-scales rather than quality. A summary of our expected time-scales for meeting the various disclosure of information requirements is set out in the section on performance measurement, alongside those defined by the Disclosure Regulations.

Communication will always be in accordance with the provisions of General Data Protection Regulation (GDPR).

Representation

The EA performs the roles of Administering and Employing Authorities with the Pensions Committee and Pension Board, supported by the Pension Fund Management team and a variety of external advisors, taking overall responsibility for Administering Authority functions. The Defra Pensions team performs the role of Employing Authority. The day-to-day administration of the funds is outsourced to Capita.

The Pensions Committee is a sub-committee of the EA Board with 14 members made up of 4 Board members, 2 Executive members, 1 NRW Executive member, 5 employee/Trades Union nominees, with 2 member nominees for pensioners and deferred members. The Committee is supplemented by an Investment Sub Group where specific advice can be provided by Officers, and external advisors. There are 2 Trade Union nominees on the Investment Sub-Group.

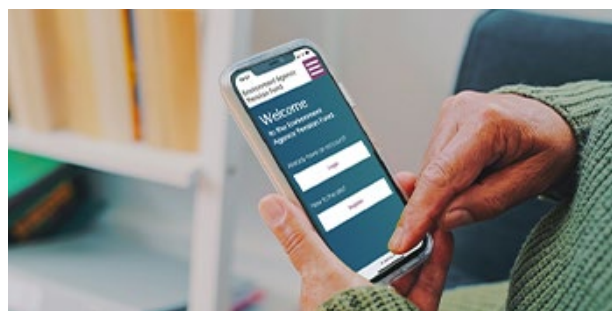
The Pension Board consists of 10 members and includes members of the Pensions Committee less the 2 Executive Directors members of the Environment Agency and 2 Active Scheme members.

Responsibilities and resources

The EAPF is responsible for the administration of the Fund but Capita carries out the day-to-day administration of the Local Government Pension Scheme (LGPS) on our behalf. Overall responsibility for communications rests with the Pensions Committee and Pension Board supported by the Pension Fund Management team, the Defra Pensions' team and Capita.

All communications including any web based or electronic material are developed jointly by the Pension Fund Management team, Capita's Technical Consultants and Communications team, with support from the Defra Pensions' teams.

One or more of these groups is also responsible for arranging all forums, workshops and meetings covered within this statement. Either the EAPF or Capita arranges design work and printing.



Where appropriate we may use external consultants to assist with the preparation and design or with the translation into Welsh.

Our expenditure on our hard copy and electronic communications is inclusive in our administration contract but we estimate that it currently equates to approximately £3.00 per member.

Communication with key audience groups

Our audience

As an LGPS Administering Authority, we communicate with a number of stakeholders. For the purposes of this communication policy statement, we are considering our communications with the following audience groups:

- Active (contributing) members
- Deferred members
- Pensioner members
- Prospective members
- Employing authorities – Defra Pensions Team & Payroll
- The EA Board and executive managers
- Pensions Committee members
- Pension Board members
- Recognised Trades Union representatives
- Pensions staff and HR
- Fund administrator



How we communicate

General communication

The Fund continues to develop and enhance its communication program and overall member experience. We're continuously learning from the enhanced website analytics about what works well and what doesn't attract as much interaction. This means we're able to evolve our communications accordingly, adding more resources where necessary.

We've also introduced the use of web books for our documents using a platform called Turtl. These are accessible interactive documents that have embedded links to relevant tools and videos. The analytics from this platform are particularly useful in helping us continuously improve.

We are committed to providing our most popular documents (which are currently in pdf format) into the Turtl format to improve user experience, engagement with useful materials and the analytics for further developments to these documents in future. This is a time-consuming process, but worthwhile for our members.

Both our public facing website and web portal facility, EAPF Online are 'device enabled' which means they allow users to access information on any mobile phone or tablet in an easily readable format, so our members can look up information or access online tools at a time of their choosing. We continue to engage with members through a number of channels to establish a view on how our members prefer to communicate and interact with the Fund.

We have developed tailored, topic-based webinars which have evolved since 2017 and we consult with members and Fund employers on content and introducing new sessions which are informed through customer surveys and focus groups.

These sessions are supported by a digital newsletter (posted for our pensioner audience), email campaigns and promotion through our Fund employers' internal communication channels. The EAPF successfully transitioned to using webinars in 2017. Members are based nationwide across England & Wales, so it provides an opportunity for all to participate, and helps those who are unable to make the time commitment or can't get to a location depending on where they are based.

Introducing webinars allows us to:

- reach a wider audience nationwide
- remove the need for travel and time out of the office
- deliver more sessions based on demand and more choice

All topics are recorded and the recorded webinars are made available on our website.

Our Communications strategy

As part of our long-term strategy, in 2018 we moved to digital communications by using our 5 segmented groups to ensure the way we engage remains relevant and personalised to our members.

Segmentation

The use of segmented 'E Shots', ensures we test different imagery, and messaging with our different groups to establish preferences. We have completed seven years of digital campaigns with specific messages being targeted to these 5 main groups. Each communication has a 'call to action' (CTA) which may be to complete a form, or to click and watch a video etc. We are able to monitor how many messages are sent, how many are opened and how many complete the CTA, and this information is then made available in our Communication dashboard.

Along with the analytics from our campaigns, we also monitor the feedback from members carefully, and will continue to collate responses to enable us to focus our messaging.

Here's an example

Each year, we send our members their annual pension statement in segmented groups to increase engagement levels. Our members have varied levels of understanding when it comes to their pension so by segmenting campaigns/comms it ensures they get content relevant to them and increases the level of engagement with the content they receive. It ensures the right audience are receiving information and content relevant to them, and that they get the right guidance for whatever action you might want them to take.

The EAPF personas are:

- Spontaneous Spenders ("I don't know anything about my pension")
- Pension Sceptics ("Why should I care about my pension")
- Assured Savers ("I am confident I am prepared for retirement")
- Responsible Worriers ("I want to know that I have my pension sorted")
- Mature Planners ("I hope I can afford to make the most of my retirement")

Annual pension statement segmented campaign 2023 results

Active campaign

We emailed 12,076 active members between 30 August and 7 September 2023. Our campaign is designed to make members understand the importance of their statement and to inform them that their statement is ready to view on EAPF Online.

Overall Active campaign results:

- 66% of these members opened their ABS campaign email
- 66% of these members also clicked through from opening the email

When broken down by segment, we can see our 'Assured Saver' segment were the most engaged:

Pension statement campaign results

Segmented group	Total Emails Sent	Opened	Open rate (O/R)	Clicked	Click through rate (CTR)
Spontaneous spender	3049	1796	59%	1126	63%
Pension sceptic	5205	3326	64%	2100	63%
Responsible worrier	3717	2768	74%	1964	71%
Assured saver	105	79	75%	64	81%

We saw over 13,400 total clicks from our campaign, with the EAPF Online portal being the most clicked link.

EAPF Online engagement following our Annual Pension Statement campaign

Our campaign notifying members when their statement is ready encourages members to engage with the EAPF Online portal. We saw an increase of 272% of members logging into their account.

In the campaign period between 30 August to 13 September 2023, we saw 8,247 members log into their online account. The Mailbox (where a member's statement is held) was visited 12,149 times and 1,934 members had visited the retirement illustrator.

When we compare this to the previous two weeks before our campaign, in the period between 15 August to 29 August, we saw 2,214 members log into their online account. The Mailbox saw 768 visits and retirement illustrator had 476 visits.

Accessibility

We do not have a policy of automatically translating our material into community languages. We do want to communicate with minority communities, so we aim to use plain English for our printed and online materials. We believe this is the most effective way to communicate with people for whom English is not their first language, but we will arrange translation on request.

Our website is partially compliant with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. EAPF is committed to making its website accessible, in accordance with these regulations and will continue to keep our compliance published.

Performance measurement

To measure the success of our communications with contributing, deferred and pensioner members, we measure open and click through rates, as well as conversion rates. We also use the following methods:

Timeliness

We will measure against the following target delivery timescales:

Communication	Audience	Statutory delivery period	Target delivery period
Scheme short guide	New joiners to the LGPS	Within two months of joining	Within two weeks of joining the LGPS
E Shot Introduction to the EAPF & video	New joiners to the LGPS	Within 2 months of joining	Within 1 month of joining the LGPS and on receipt of email address
Annual estimated Benefit Statements as at 31 March	Contributing & deferred members	31 August each year	31 August each year
Telephone calls	All	Not applicable	90% within 15 seconds
Issue of retirement benefits (at normal pension age)	Contributing members retiring	Within one month of retirement	On day of retirement - 90% of estimate if final details not known. Balance within five days of receipt of information
Issue of retirement benefits (early retirements)	Contributing members retiring	Within two months of retirement	On day of retirement - 90% of estimate if final details not known. Balance within 5 days of receipt of information
Issue of deferred benefits	Leavers	Within two months of notification	Within two months
Transfers in	Joiners & contributing members	Within three months of request	Within two months
Transfers out	Leavers & deferred members	Within three months of request	Within two months
Issue of forms i.e. expression of wish	Contributing & deferred members	Not applicable	Within five working days
Changes to scheme rules	Contributing & deferred & pensioner members, as required	Within three months of the change coming into effect	Within three months of change coming into effect
Pension Fund Annual Report and Accounts	All	Within two months of request	Within two working days (once published)
Spotlight	All	Not applicable	By 31 December each year
Pensioner payslips	Pensioners	On change to pension amount due	Monthly five days before pay date

Quality

We make use of a range of mechanisms to monitor the quality of our communications which include surveys, focus groups and website activity. All our publications and our website include invitations for comment on content and offer suggestions for future editions and contact details are provided.

Capita Pensions Solutions Ltd are accredited with the Investors in People (IIP) standard. The IIP standard sets out the criteria for high performance through people. It's a framework to benchmark the effectiveness of leadership and management practices in any organisation.

Those that meet the performance requirements of the IIP standard proudly display their accreditation to the world. It's a mark recognised across 75 countries that sets apart those that have achieved excellence in the way they lead, support and manage people.



Results

We will publish an overview of how we are performing within our annual report and financial statements and in our 'Spotlight' item which is available on our website. Full details will be reported regularly to our Pensions Committee.

We report to our Pension Committee quarterly and provide a communications update annually.

Protecting member data

The Environment Agency Pension Fund (EAPF) is a Data Controller under the General Data Protection Regulations (GDPR). This means we store, hold and manage personal data in line with statutory requirements to enable us to provide members with pension administration services. To enable us to carry out our statutory duty, we are required to share information with certain bodies, but will only do so in limited circumstances.

For more information about how we hold data, who we share it with and what rights our members' have to request information from the Fund, please read our [full privacy policy](#). We have also produced a helpful Q&A which can be found on the privacy policy page.

Review process

We will review our communication policy to ensure it meets audience needs and regulatory requirements at least every two years. A current version of the policy statement is always available at www.eapf.org.uk/policies

Paper copies are available on request.

Approved by the Pensions Committee on 26 June 2024 and reviewed annually.