
COMMUNICATIONS POLICY

1.0 Policy Statement

The Trustees of the Public Education Benefits Trust Fund (the “Trustees”) will endeavour to provide timely, relevant and accurate information to interested parties regarding all aspects of the Public Education Benefits Trust Fund (the “PEBT”). The objective is to ensure that they are made aware of any decisions, actions or changes that will have an impact on the PEBT.

2.0 Purpose

The purpose of this Communications Policy is to:

- a) Provide guidance to Trustees for how and when to communicate with primary interested parties.
- b) Educate primary interested parties on the features and benefits of the PEBT and the opportunities provided to members so they may obtain the maximum benefit from the PEBT.
- c) Foster primary interested parties’ appreciation of the PEBT’s commitment to a health and well-being program that is responsive to their fundamental needs and administered in a manner consistent with PEBT Purpose and Values.
- d) Provide primary interested parties with information on how to access information and understand the governance of the PEBT.
- e) Ensure communications to primary interested parties are consistent and free from material omissions and misstatements to reduce legal liability risks associated with claims of breach of statute, breach of fiduciary obligation and negligent misrepresentation.

- f) Ensure primary interested parties receive, at a minimum, the information they are entitled to by law.
- g) Provide service providers with guidelines and standards on how communications will be created and distributed to the PEBT's primary interested parties.

3.0 Interested Parties

Primary Interested Parties include but are not limited to:

- a) Eligible members of participating support staff unions
- b) Participating school district employers, including school district administrators, management staff, and those on the District Joint JEIS Committee
- c) Unionized Support Staff bargaining agents, including local executive team and those on their District Joint JEIS Committee
- d) Canadian Union of Public Employees ("CUPE")
- e) B.C. Public School Employers' Association ("BCPSEA")
- f) CUPE BC K-12 Presidents' Council
- g) Provincial Government Authorities
- h) Service Providers
- i) Benefit Providers/Administrators

4.0 Review of the Policy

This policy shall be reviewed by the Administration Committee ("Committee") at least once annually or more frequently, if necessary. The Committee shall make recommendations to the Board for any changes it considers necessary or appropriate.

5.0 Standards

Communications will:

- a) Be member-centric.
- b) Be concise and incorporate the usage of plain language.
- c) Be accurate, timely and complete.
- d) Provide consistent messaging across interested party groups.
- e) Be provided in multiple mediums, when reasonably appropriate and available, to reflect interested parties' differing communication needs.
- f) Reflect the Values of the PEBT.
- g) Follow the PEBT branding standards.

All interested parties will be provided access to the following, when available:

- a) Trust Agreement
- b) Annual Report
- c) Plan documents (or benefit contracts, if applicable)
- d) Benefit plan details
- e) Applicable policies

6.0 Responsibilities

6.1 PEBT Board of Trustees

The Board is responsible for establishing, implementing, and reviewing this policy.

6.1.1 Chair and Vice Chair

The Chair of the Board (the Chair) will speak on behalf of the Board. If the Chair is unavailable, the Vice Chair will speak on behalf of the Board. When neither are available, communication can be delegated to other Trustees to speak on Board matters. Written communication, when required from the Chair, will be jointly sent by the Chair and Vice Chair.

6.1.2 Individual Trustees

This policy and the PEBT Conflict of Interest policy will govern trustees, as individuals. Specifically, individual trustees:

- a) Will speak on behalf of the Board only with prior notification to the Board.
- b) May respond to questions from or report to members, employers, union locals and Settlers on matters related to Board deliberations where the information has been made public.
- c) Only with the Board’s prior approval may a trustee report to members, employers, union locals and Settlers on matters related to Board deliberations where the information has not been made public.
- d) May use meeting reports and other material to discuss with a Settlor an issue that is before the Board, unless explicitly restricted by the Board. Standing explicit restrictions include legal opinions/documents, appeals material and personal information of individuals.
- e) May provide reports and other material to a Settlor from each Board meeting, unless explicitly restricted by the Board. Standing explicit restrictions include legal opinions/documents, appeals material and personal information of individuals.
- f) Will consult the Trust Secretariat if an issue or situation occurs about which the trustee is uncertain how to respond.
- g) Will not speak to the media on plan matters unless authorized by the Board.

6.2 Administration Committee

The Committee will:

- a) Monitor and report on the implementation of this policy.

- b) Develop and implement the communications strategy for approval by the Board.
- c) Provide advice to the Trust Secretariat regarding the objectives and content of communications.
- d) Approve communication messages.
- e) Track other internal and external policies and contracts to ensure the applicable committee reviews each regularly, on a schedule deemed appropriate for each policy/contract, and makes revision recommendations, when necessary.

6.3 Trust Secretariat

The Trust Secretariat will:

- a) Assist the Committee, with the support of a communications consultant, developing and implementing the communications strategy.
- b) Identify communication requirements and opportunities, and recommend the appropriate medium, distribution methods, and frequency.
- c) Develop and deliver, with approval from the Committee, communications with distribution support from the appropriate service provider(s) when needed.
- d) Review service provider communications, when required, and provide feedback or distribution to the Board for approval, when necessary.
- e) Maintain the PEBT's website content.
- f) Advise Trustees on appropriate communication processes and protocols for certain issues or situations according to this policy and the Conflict of Interest policy.
- g) Report urgent media issues to the Board immediately.
- h) Assist in the response to public inquiries.
- i) Act as liaison between the Board and interested parties.
- j) Maintain an inventory of communication materials available for interested parties.

6.4 Service Providers

Several service and benefit providers engaged by the Board are responsible for certain communications to members and other interested parties. This policy outlines the most common communications provided by external providers, the audience, and level of oversight the PEBT should have for each type of communication. For any communication not specifically outlined in this policy, the service provider will confirm with the PEBT how to proceed. As well, external providers shall adopt the PEBT branding standards, at the PEBT's request.

PEBT oversight is categorized into three (3) levels defined as follows:

- a) **Inform** – the service provider must advise the PEBT of the communication, distribution method and intended audience. A copy of the communication will be provided to the PEBT upon request.
- b) **Consult** – the service provider must consult with the PEBT before the communication is distributed to the intended audience. The PEBT will provide feedback on content, timing, audience and distribution method for consideration.
- c) **Approve** – the service provider must seek approval for the communication material prior to distribution. The PEBT will provide feedback on content, timing, audience and distribution method and the communication shall not be distributed until the Trust Secretariat confirms approval. The Trust Secretariat will be responsible for obtaining approval from the Committee or Board, when required.

6.4.1 Benefits Consultant

The Board has appointed a Benefits Consultant to provide ongoing advice and services related to monitoring and managing the PEBT Benefits Plan.

Examples of the most common communications the Benefits Consultant is responsible for include the following:

Communication Material	Audience	Level of PEBT Oversight
Renewal report template	School districts and union locals	Approval
Communication of renewal rates	School districts and union locals	Inform
Communication of plan costings	School districts and union locals	Consult
Coordinating plan changes	School districts and union locals	Inform
Quarterly financial statements/claims experience reports template	School districts and union locals	Approve
Development and distribution of bulletins and memos regarding changes to benefit entitlements or to how benefits are delivered	School districts and union locals Members via school districts and union locals	Approve
General bulletins regarding the Benefit Consultant aimed at all clients	Member, school district, and/or union local	Inform

6.4.2 Benefits Plan Administrator

The Board has appointed a Benefits Plan Administrator to provide ongoing benefits administration system and system support. Examples of the most common communications the Benefits Plan Administrator is responsible for include the following:

Communication Material	Audience	Level of PEBT Oversight
Day-to-day administration support to district administrators	School districts	Inform (Inform the PEBT regarding overall methods and timing)
Changes to or reminders about administration processes	School districts	Consult
Service updates	School districts	Consult
Notices about system disruptions due to maintenance or unexpected issues	School districts	Inform

Training materials	School districts	Consult
Distribution of bulletins or memos created by or in partnership with the PEBT where it is jointly decided the Plan Administrator will distribute	School districts and union locals	Approve (the PEBT will provide the content and direct how, when and to whom the communication will be sent)

6.4.3 Benefit Providers

Benefit Providers/Insurers make the benefit payments to PEBT members and beneficiaries as determined in the PEBT group insurance contracts or Plan Text.

Examples of the most common communications the Benefits Providers/Insurers are responsible for include the following:

Communication Material	Audience	Level of PEBT Oversight
Claim adjudication decisions (other than LTD)	Members	Inform (Inform the PEBT regarding general method and timing)
Claims adjudication and submission requirements (other than LTD)	Member, school districts and union locals	Inform (Inform the PEBT regarding the general method and timing)
JEIS and LTD claims correspondence templates	Member, school districts and union locals	Approve
Requests for additional information	Members, school districts	Inform (Inform the PEBT regarding general method and timing)
Changes to or reminders about reasonable and customary limits	Members, school districts, and/or union local	Inform (Inform the PEBT regarding the general method and timing)
Changes to or reminders about administration processes or claims adjudication and submission requirements	Member, school district, and/or union local	Consult - for PEBT specific changes Inform – for general changes
General bulletins/newsletters regarding the Benefit Provider aimed at all clients	Member, school district, and/or union local	Inform
Claim Forms	Member, school district	Inform

Service providers will follow the specific communications requirements and service level agreements outlined in the service agreement/contract established they have with the PEBT, if applicable.

6.5 School districts and union locals

School districts and union locals are sometimes requested to distribute communications material created by the PEBT for members as they have contact information which the PEBT does not hold. Any communication material will be approved by the appropriate Committee or Board prior to any request for distribution is made to the school districts and union locals.

7.0 Communication Channels

The Trustees will continue to evaluate the most effective approaches to disseminating information regarding the PEBT. Communications will primarily be provided through the following formats, but is not limited to:

- a) E-mails
- b) Website
- c) Memorandums¹
- d) Bulletins²
- e) Regional meetings
- f) Webinars
- g) Surveys
- h) Conference calls
- i) Videos
- j) Reports
- k) Brochures
- l) Posters

8.0 Third Party Requests

8.1 Third Party Requests to Service Providers

Service Providers of the Board are occasionally approached by a third party to speak on matters related to the PEBT. In this case, the service provider will:

¹ A memorandum is addressed to a specific interested parties or group of interested parties from the PEBT Board of Trustees about a specific plan or process change that may require action from the interested party(ies).

² A bulletin is general information to interested parties providing an update about a benefit(s), process or protocol that may not require further action.

- a) first obtain the Board’s authorization to speak to the third party on matters related to the PEBT;
- b) clearly establish with the third party that the service provider does not speak on behalf of the Board.

8.2 Third Party Request to Provide Information to Plan Members

- a) The Board may approve a request from a third party to provide information to members if the following conditions are met:
 - i. The Board remains in compliance with the Freedom of Information and Protection of Privacy Act, specifically section 32 on the use of personal information.
 - ii. In the opinion of the Board, the purpose and values of the third party are consistent with those of the PEBT.
 - iii. The information is not of a commercial or lobbying nature.
 - iv. The information does not directly or indirectly imply that the Board endorses a product, service or organization.
 - v. Any direct costs to provide the information to members are not borne by the PEBT.
 - vi. New communication products and vehicles will not be created solely to disseminate third-party information.
- b) The Board will not charge a third party a fee for providing access to members through plan-related communications products and vehicles other than to recover any direct costs referred to in a(v).
- c) The Board may approve posting links to third-party websites on the plan website subject to the criteria above.

9.0 Communication with Settlers

9.1 Communication to Settlers

The Board will direct the Trust Secretariat to write to the Settlers, on behalf of the Board, to inform them of, and request input or approval on, matters specifically identified by the Board. This includes, but is not limited to:

- a) Invitation to the annual meeting for a presentation of the annual report, including the audited financial statements.
- b) Requests for confirmation of trustee (re)appointment.
- c) Recommendations for changes to the Trust Agreement.

9.2 Requests for Information from Settlers

- a) A Settlor may request information, such as plan data or investment information etc., regarding the PEBT from the Board.
- b) Responses for requests for information from one Settlor will be shared with both Settlers.

10.0 Social Media

The Board does not allow the official use of social media by individual Trustees.

- a) Trustees may not post or comment on materials on social media sites in their official capacity as a Trustee.
- b) The Board acknowledges that Trustees may use social media for personal use and request they consider this communications policy when engaging in social media. The following guidelines should be adhered to:
 - i. Ensure your personal and professional online activity does not conflict with professional commitments. Do not post anything that could potentially threaten the business or reputation of the PEBT or its members.

- ii. Disclose who you are but remember you are responding in a personal context and not in your capacity as a Trustee.
 - iii. Think carefully before posting, and when in doubt, don't post. Take time to understand the culture and rules—explicit and implicit—of the communities with whom you seek to engage.
 - iv. Do not disclose confidential information or discuss unpublished information about the Board or the benefits plans.
- c) The Chair or Vice-Chair may, with approval from the Board, respond to comments posted on social media sites.
 - d) The Board may request the removal of any material posted on a Trustee's personal social media site if it feels the material does not support this policy.
 - e) The website (pebt.ca) will be the PEBT's primary internet presence.
 - f) The Board may approve using other internet or social media tools such as Facebook, Twitter and YouTube.
 - g) PEBT profiles on social media sites will be branded to ensure they are consistent and accurately represent the PEBT's identity. The profiles will be maintained for accuracy and will not be actively used, unless approved by the Board.

Approved: March 7, 2023

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