

# DE BEERS BENEFIT SOCIETY

## SOCIETY POLICY DOCUMENT

### COMMUNICATION POLICY

Revision no

Review cycle

Effective date

011

At least every two years

29 September 2020



A registered medical scheme  
Registration no. 29/4/2/1068

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## 1. INTRODUCTION

The Society, a self-administered restricted medical scheme predominantly for South African employees and pensioners of the De Beers Group and their dependants, provides benefits for approximately 9 200 beneficiaries with around half of these being principal members.

The delivery of benefits requires effective and timeous communication with members and beneficiaries, as well as with a number of other stakeholders.

## 2. SCOPE

The policy applies to the Society, its employees, the relevant service providers, the Communication and Education Board Committee (the Committee) and the Board.

## 3. REGULATORY FRAMEWORK

One of the primary objectives of the Board is to ensure that sufficient, timeous and appropriate information is supplied to members, to inform them of their rights, obligations, benefits, membership contributions in terms of the rules of the Society, and any change relating thereto or any other matter affecting their membership of the Society.

In so doing, the Society also needs to consider all applicable legislation and governance provisions to ensure that all communication requirements are effectively met, in particular:

- Section 57(4)(d) of the Medical Schemes Act No. 131 of 1998 (the Act) states that “*schemes should ensure that adequate and appropriate information is communicated to members regarding their rules, benefits, contributions, and duties in terms of the rules of the medical scheme*”;
- According to the Code of Conduct in respect of the Prescribed Minimum Benefits, communication of benefits must be clear, in plain language and must be readily available; and
- The Council for Medical Schemes (CMS) issued a guideline in July 2014, “*Communication Guidelines for Medical Schemes*”, outlining standard communication guidelines for medical schemes which, amongst other deliverables, stipulates the format, level of information and channel of communication required to communicate with members and providers.

The King IV Report on Corporate Governance for South Africa (King IV) sets out the philosophy, principles, practices and outcomes which serve as the benchmark for corporate governance in South Africa. It aspires to apply to all organisations, including medicals schemes. The Society is fully committed to the principles and practices that are applicable to the Society. This holds particularly – insofar as it relates to the Society’s communication – for Principle 5, which deals with reports issued by the Society, and Principle 16, which addresses stakeholder relationships.

The policy takes account of and is drafted in accordance with the above statutory requirements and the guidelines issued by the CMS.

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## 4. DEFINITIONS AND ACRONYMS

Definition / Acronym	Description
Board	Board of Trustees
CMS	Council for Medical Schemes
DSPs	Designated Service Providers
PMBs	Prescribed Minimum Benefits
The Act	Medical Schemes Act No. 131 of 1998
The Committee	Communication and Education Board Committee
The Society	De Beers Benefit Society

## 5. RESPONSIBILITIES AND AUTHORITY

Designation	Responsibility
Board	<ul style="list-style-type: none"> <li>To approve the policy on the recommendation of the Committee.</li> </ul>
The Committee	<ul style="list-style-type: none"> <li>To review the policy and recommend revisions to the Board for approval.</li> </ul>
Principal Officer	<ul style="list-style-type: none"> <li>Policy owner and policy interpretation as required;</li> <li>To ensure that the policy is implemented and regularly updated; To promote and ensure compliance with the policy by all concerned; and</li> <li>Any enquiries in relation to the policy should be directed to the Principal Officer.</li> </ul>
Secretarial and Communications Manager	<ul style="list-style-type: none"> <li>To draft and review the policy, in consultation with the Society's contracted communication specialist;</li> <li>Alignment of the policy to associated Society policies and procedures, as well as regulatory requirements and provisions;</li> <li>To ensure that communication strategies aligned to this policy are maintained; and</li> <li>To advise the Principal Officer of any non-compliance with the policy.</li> </ul>

Any matter relating to communication not provided for in this policy must be referred to the Principal Officer who may, in consultation with the Chairpersons of the Committee and the Board, exercise his/her discretion in dealing with the issue prior to reporting the matter at the next scheduled meeting of the Board, along with a proposed policy change, where appropriate.

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## 6. RELATED DOCUMENTS

The policy is complemented by the Society's Communication Strategy, which offers a detailed breakdown of audiences, key messages, media to be used, timing of communication and expected costs involved.

## 7. POLICY

### 7.1 PURPOSE OF THE POLICY

The purpose of this document is to formalise the communication responsibility of the Board towards its members and other stakeholders. To this end, the Board is committed to clear, simple, transparent, appropriate and comprehensive communications, delivered in a cost-effective and timeous manner via media that is easily accessible. Specifically, this policy aims to ensure:

- that the Board's duty of providing adequate and appropriate information to members and beneficiaries in terms of the regulatory framework is met;
- that members gain a better understanding of the benefits for which they qualify;
- that members can make informed decisions about the responsible use of their benefits; and
- that the resources of the Society are used in a responsible, cost-effective manner to achieve the objectives of this policy.

The Board recognises that the focus of the Society's Communication Strategy is the transfer of knowledge and understanding as opposed to the mere distribution of information.

### 7.2 OBLIGATIONS OF KEY ROLE PLAYERS

#### 7.2.1 THE SOCIETY

Society Management and other staff members, as deemed necessary, will attend a planning workshop with the contracted communication specialist once a year, to review the Society's Communication Strategy.

The Society's Secretarial and Communications Manager, with the assistance of external specialists that may be required from time to time, will be responsible to develop communication material in line with the Society's Communication Strategy. Where necessary, such communication will receive input from the Principal Officer, Chief Operating Officer and Society Manager, as well as other Society staff members as deemed appropriate. Any material that communicates Society information to members in general (Society newsletters, member guides, annual reviews and appropriate ad-hoc communication) must be approved by the Committee before circulation to members.

Excluded from the above are member-specific communications not applicable to all members, for example, responses to queries, providing clarification, or changes to individual benefit entitlements, such as medicine formulary changes.

Where deemed appropriate by Society Management and/or the Committee, technical specialists such as the Society Actuary, Investment Advisor(s) or Legal Advisor(s) may also be requested to review communication material.

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## 7.2.2 MEMBERS

While the Society fully accepts accountability for member communication, members themselves remain personally accountable to ensure that they remain updated and informed regarding their benefits and developments affecting the Society, and that they act responsibly in relation to the Society, as their behaviour (claiming patterns) has a direct impact on membership contributions and the future sustainability and viability of the Society.

It is important that members should review all forms of available Society communication, accept responsibility for reading all communications directed at them, attend the Society's information sessions as appropriate, refer queries to the Society for clarification, and provide the Society with feedback should their information requirements not be met. In addition, members are required to familiarise themselves with the rules of the Society and benefit structure to enable them to understand their rights, obligations, membership contributions and benefit entitlements. This includes their rights, and the required procedures, relating to lodging complaints. Members are further required to continuously update their and their beneficiaries' status and contact details with the Society and to attend the Annual General Meeting of the Society, where possible.

## 7.3 MAIN OBJECTIVES OF COMMUNICATION

A comprehensive list of specific communication objectives appears in the Society's Communication Strategy, together with communication initiatives for a rolling three-year period. However, the overriding objectives of Society communication are the following:

- Empowering members to understand the benefits provided by the Society and the need to use these responsibly, and to play an active part in remaining informed of all relevant aspects of these important benefits;
- Providing Society information regarding members' benefits through access to legislation-compliant, clear and understandable information conveyed via a range of accessible user-friendly media; and
- Promoting a positive image of the Society that is consistent with the Society's core values of value for money, service excellence and the fair treatment of members.

## 7.4 PRINCIPLES OF COMMUNICATION

In terms of this policy, communication should:

- comply with the requirements of the Society's legal and governance framework;
- be accurate and complete (without being so lengthy as to 'lose' readers);
- be useful, appropriate and relevant;
- be timely;
- be contemporary, friendly, honest and 'human';
- be written in a simple easy-to-read manner, in as much as this is possible when dealing with medical scheme information;
- be structured in such a way that information is layered, with important aspects highlighted and more detailed information available;
- deal with the information needs that members have about the Society;
- appeal to members from different backgrounds;
- be based on regular research;

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- be promoted as an ongoing, two-way process;
- be confidential at individual member level;
- be priced in such a way that it offers good value for money;
- use appropriate media to reach a range of members;
- be produced (in the case of printed material) in simple English, but with telephonic support being available in other languages where possible;
- emanate from the Principal Officer as the Society's officially designated spokesperson to ensure consistency and create a single point of reference; and
- not expose the Society to legal liability for consequential loss or damages.

## 7.5 AUDIENCES

Direct communication to members and beneficiaries forms the main focus of the Society's communication. However, identified secondary/support audiences play a supporting role and sometimes act as conduits for the flow of Society information to members and these audiences should therefore also receive communication/training, where relevant. The following audiences have been identified:

### 7.5.1 BENEFICIARY AUDIENCES

- Working members;
- New members;
- Members approaching retirement;
- Pensioners and cash-paying members; and
- Beneficiaries other than principal members.

These audiences should be increasingly segmented to facilitate targeted communication. Not only is personalised communication more likely to be read, but it could also play a powerful role in assisting beneficiaries to address health problems more pro-actively, and thus reduce downstream costs for the Society.

### 7.5.2 SECONDARY/SUPPORT AUDIENCES

- Trustees and Board Committee members;
- Employers (Executive and other Management, and HR Department staff); and
- Society staff and relevant service providers.

## 7.6 KEY MESSAGES

Key messages are drafted in line with the specific objectives outlined in the Society's Communication Strategy, and revolve around (but are not limited to) the following issues:

### 7.6.1 BENEFIT ISSUES

- Benefit structure (including benefit limits, exclusions, penalties and co-payments);
- Designated Service Providers (DSPs) and preferred provider networks (e.g. hospital, medicine and optometry networks) and any changes thereto;
- Prescribed Minimum Benefits (PMBs) and non-PMB benefits;
- The application process to register for PMB benefits;

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- The appeal process when a claim for a PMB is not recognised by the Society;
- Chronic medicine benefits and formularies and how to register for these benefits;
- Chronic Disease List (CDL) and the applicable formularies, and any updates thereto;
- Non-CDLs and the applicable formularies, and any updates thereto;
- Benefit and hospital admission pre-authorisation requests;
- Payment of accounts;
- Waiting periods; and
- Late joiner penalties.

## 7.6.2 MANAGEMENT ISSUES

- Details of the Board and Board Committees;
- Names and contact details of Society Management;
- The registered rules of the Society;
- Details of the Society's governance and other policy documents (e.g. Investment Policy Statement);
- Details of Annual or Special General Meetings;
- Details of the Trustee election process, as and when required;
- Process for submitting a query or complaint to the Society; and
- The role of the Society's call centre.

## 7.6.3 MEMBERSHIP ISSUES

- Medical scheme membership details and when membership of the Society terminates;
- The application and registration process and necessary disclosures required at the time of registration;
- The requirement of the Act that a member or dependant may only belong to one medical scheme at any given time;
- The conditions under which membership may be suspended;
- Continuation membership criteria; and
- Access to a certificate of membership on termination of membership.

## 7.6.4 REGULATORY AND GOVERNANCE ISSUES

- Changes to the registered rules of the Society;
- Changes to regulatory requirements or issues raised by the CMS; and
- Governance issues.

## 7.6.5 FUNDING ISSUES

- A summarised version of the Annual Financial Statements and access to the complete set of the Annual Financial Statements;
- Changes in membership contribution levels;
- The impact of members' claiming patterns and behaviour on the financial position of the Society and membership contribution levels;

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- Any matters such as employer restructuring and medical inflation that could impact on the financial sustainability of the Society and membership contribution levels; and
- The Society's solvency ratio and any other relevant financial ratios.

## 7.6.6 GENERAL

- The role of the CMS and contact details (e.g. website and physical address);
- The process to lodge a complaint with the CMS; and
- Any other information that the Board considers appropriate or relevant.

## 7.7 COMMUNICATION MEDIA AND TOUCHPOINTS

Very few audiences receive exclusive communication. Instead, key messages relevant to the various audiences will often overlap.

The specific communication media and touchpoints employed by the Society are covered in detail in the Society's Communication Strategy, which is compiled by Society Management and approved by the Committee and the Board annually.

The following is an overview of communication media to be employed as a minimum:

### 7.7.1 MEMBER COMMUNICATION

- Changes to the registered rules and benefit structure of the Society;
- New entrant letter confirming membership to be sent to all new members/dependants;
- A copy of the latest Member Guide;
- Two (2) personalised Society membership cards with relevant contact and dependant details;
- A statement of weekly claims processed emailed to all members who have registered an email address with the Society;
- A monthly statement emailed to all members who have registered an email address with the Society, and posted to those members who do not have registered an email address; and
- Annual tax information sheet.

In addition, the following forms of member communication are also used:

- Regular newsletters and newsflashes to members;
- Member information sessions;
- A comprehensive, interactive and up-to-date website containing all relevant Society and other information;
- A functional call centre that is easily accessible via telephone, fax, email or personal consultation; and
- Highlights of the Annual Financial Statements.

Additional communication media and touchpoints may be added to the existing range of media as identified and approved by the Committee.

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## 7.7.2 SECONDARY/SUPPORT AUDIENCE COMMUNICATION

Various secondary/support audiences play an invaluable role in disseminating Society information, dealing with ad-hoc queries as a first point of call and allowing the Society to benefit from their fora. These audiences will therefore receive the following:

### Trustees and Board Committee Members

- Appropriate education, as provided for in the Society's Trustee Education Policy, to ensure that Trustees and Board Committee members not only can fulfil their fiduciary duties but can also remain abreast of all relevant developments in order to be able to handle any queries they may receive from members.

### Employers (Executive and other Management, and HR Department staff)

- Appropriate training and briefing sessions on new developments and other matters, as and when required.

### Society staff and relevant service providers:

- Appropriate training and briefing sessions to keep audiences updated on matters such as the rules of the Society, benefits, DSP agreements, legislative and process changes and industry developments.

## 7.8 EVALUATION OF SOCIETY COMMUNICATION

In order to evaluate the success of Society communication objectively and accurately, desired and measurable outcomes (objectives) provided for in the Society's Communication Strategy should be implemented for the various forms of communication where this is practical. Evaluation of any given form of communication is achieved through feedback mechanisms built into the specific media distributed and feedback received during group sessions. Surveys will be conducted with samples of members to assist in the evaluation of Society communication and to ensure that the Board's commitment to "Treating Consumers Fairly" is understood by members.

In addition to this, an annual communication review to assess the successes and failures of the Society's Communication Strategy will be conducted by Society Management, in consultation with the Society's contracted communication specialist, and the results of this review will be reported to the Committee.

The Board will also be requested to provide input on the Society's Communication Policy and Communication Strategy in the annual Trustee self-assessments. The Committee will consider the Board's and Board Committees' comments when reviewing the Society's Communication Policy and Strategy documents on an annual basis before these are submitted to the Board for approval.

## 7.9 MANAGEMENT OF COMMUNICATION

Where relevant, the Society's Communication Strategy will specify role players, their responsibilities and key dates for distribution or communication, as appropriate.

Society Management, as well as the communication team, will work closely with the Committee, which will meet or review documentation and communication material as and when required, in order to ensure the appropriate application of this policy.

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Meetings of the Committee may be called by the Chairperson of the Committee. Minutes of Committee meetings will be taken and distributed within a reasonable period following a meeting and will be placed on the confidential Trustee Zone. All communication deliverables will be listed in the Society's Communication Strategy document prepared by Society Management and approved by the Committee and the Board.

## 7.10 COMMUNICATION BUDGET

Society Management is responsible for compiling a communication budget in line with the Society's Communication Strategy and for submitting the budget to the Committee for their consideration. This budget, which is subject to final approval by the Board, will be reviewed annually as part of the review of the Society's Communication Policy and Strategy documents, and will be actively managed and accounted for on a regular basis during the course of each financial year by Society Management.

## 8. AUTHORISATION AND APPROVAL

Approved by Board of Trustees.



CW Coltman  
Chairperson



Date

## REVISION HISTORY

REVISION NO	DESCRIPTION	DATE REVIEWED	DATE APPROVED	MINUTE NO
0	Policy created	Created	3 December 2009	69.09
1	Annual review	August 2010	21 September 2010	80.10
2	Annual review	August 2011	21 September 2011	38.11.6
3	Annual review	August 2012	19 September 2012	42.12
4	Annual review	August 2013	18 September 2013	44.13.3
5	Annual review	August 2014	17 September 2014	40.14.3
6	Annual review	August 2015	16 September 2015	37.15.2
7	Annual review	August 2016	21 September 2016	37.16.2
8	Annual review	August 2017	20 September 2017	40.17.2
9	Annual review	August 2018	26 September 2018	47.18.2
10	Annual review	August 2019	18 September 2019	50.19
11	Annual review	September 2020	29 September 2020	42.20.2