

Subject	Data Quality Improvement Plan	Status	For Publication
Report to	Local Pensions Board	Date	15 July 2021
Report of	Head of Pensions Administration		
Equality Impact Assessment	Not Required	Attached	No
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1 **Purpose of the Report**

- 1.1 To update members on the latest iteration of the Data Quality Improvement Plan and the progress made to date in resolving data discrepancies.

2 **Recommendations**

- 2.1 Members are recommended to:
- a. **Note the updated Data Quality Improvement Plan summary and comment on any further reporting requirements or actions**

3 **Link to Corporate Objectives**

- 3.1 This report links to the delivery of the following corporate objectives:

Customer Focus

to design our services around the needs of our customers (whether scheme members or employers). Maintaining high quality data for scheme members is an important part of encouraging members to engage online and have confidence in accessing their own pension accounts.

Effective and Transparent Governance

to uphold effective governance showing prudence and propriety at all times. The Pensions Regulator's Code of Practice 14 advises that schemes should continually review their data and carry out a data review exercise at least annually. This should include an assessment of the accuracy and completeness of the member information held.

4 **Implications for the Corporate Risk Register**

- 4.1 The actions outlined in this report one method of working to mitigate risk O1 in the Corporate Risk Register which centres on the ability of the Authority to protect the data it owns and the data it handles.

5 Background and Options

5.1 Members may be aware that, since 2018, LGPS funds have been required to report to the Pensions Regulator on the quality of common and conditional (scheme specific) data in the submission of the annual Scheme Return.

5.2 **Common** data are basic data items which are used to identify scheme members and are defined by the Regulator. These consist of:-

National Insurance number; Surname; First Name or Initials; Sex; Date of Birth; Retirement Age; Last status event; Address including Postcode; Start Date; Membership Status

5.3 **Conditional** (scheme-specific) data is not explicitly defined by the Regulator but is data which is key to running the scheme and meeting legal obligations. In general terms for the LGPS this will be data such as membership details, pensionable pay, contributions, etc. The Scheme Advisory Board (SAB) developed guidance for LGPS funds on the specific data fields which should make up the measurement of conditional data and SYPA follows this guidance. It should be noted that it is not mandatory to follow the guidance and some funds may use local measures which makes direct comparisons difficult.

5.4 The data scores reported to TPR form the basis of the data quality improvement plan. For reference the scores are generally reported in December of each year and the scores reported for the last three years are shown below.

	2020	2019	2018
Common Data Score	96%	96%	96%
Conditional Data Score	93%	91%	87%

Data Quality Improvement Plan

5.5 TPR advises that schemes should have a data quality improvement plan in place. SYPA have shared previous iterations of the plan with the Board but this has been revised on a number of occasions to reflect changing guidance and priorities. The current data improvement plan is maintained by the Pensions Technical Adviser and **Appendix A (common data and conditional data)** is provided as a summary extract of the current plan which highlights where individual teams have ownership of specific areas.

5.6 The key areas of focus for the next few months have been highlighted on the summary plan and we will report progress against the priorities to future meetings of the Board. It is clear there are a number of areas (particularly in relation to *conditional* data) where the volumes of discrepancy have increased rather than reduced and additional resource is being allocated to these to try and ensure the revised target dates suggested can be met ahead of the 2021 TPR reporting.

5.7 A few areas (where CARE revaluation is involved) are marked as not being reported and this is because of the timing of the annual member revaluation updates which are part of the annual benefit statement production process. These discrepancies will be

assessed once the benefit statement exercise is completed and included in the project plan and reported on later in the year.

- 5.8 It is worth noting that the most significant area of *common* data discrepancies relates to “gone away” deferred members. SYPA have recently engaged a tracing agency to assist with tracing these members. The initial work carried out by the tracing agency has identified a potential forwarding address for 2,600 of the 4,000 known “gone away” deferred members. Additionally, the initial work has identified some 5,000 potential further deferred member cases where we may hold an incorrect address. Work is underway to contact all members who have potentially moved address to verify their identity before updating our records.
- 5.9 With regard to the remaining 1,400 records, more detailed secondary level tracing is being trialled with the tracing agency to identify the likely success levels before committing any further expenditure.

6 **Implications**

- 6.1 The proposals outlined in this report have the following implications:

Financial	None
Human Resources	None
ICT	None
Legal	None
Procurement	None

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Background Papers	
Document	Place of Inspection