Subject	Data Quality Improvement Plan	Status	For Publication
Report to	Local Pensions Board	Date	27 April 2023
Report of	Interim Assistant Director - Pensions		
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 latest data scoring provided to the Pensions Regulator.

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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

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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

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.

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4 Implications for the Corporate Risk Register

4.1 The actions outlined in this report are 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.

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5   Background and Options

TPR Annual Scheme Return

5.1   Members will be aware that, since 2018, LGPS funds have been required to report annually to the Pensions Regulator (usually each November) 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 for the last five years are shown below. Although there has been incremental progress in the past four years, the results for 2022 (submitted in November 2022) have levelled off in terms of the overall percentage of errors, despite a modest reduction in the numbers of outstanding queries. The Plan referred to in paragraph 5.6 seeks to address this challenge over the next six months.

	2022	2021	2020	2019	2018
Common Data Score	97%	97%	96%	96%	96%
Conditional Data Score	94%	94%	93%	91%	87%

5.5   Noting the comment in Section 5.3 regarding the difficulties of direct comparison, the results reported by SYPA are broadly comparable with other LGPS funds.

Data Quality Improvement Plan

5.6   The ability of SYPA to provide an efficient and effective pensions administration service to our members and their employers requires us to maintain a constant focus on data quality, seeking improvement in quality wherever we can. The current data improvement plan is maintained by the Pensions Technical Adviser and   **Appendices A (common data) and B (conditional data)** are provided as a summary extract of the current plan which highlights where the ownership of specific areas lies.

5.7   As previously reported, the bulk of the errors in the common data set relate to missing, partial or incorrect addresses, which remain stubbornly high. Officers are now exploring options for a one-off tracing exercise in order to make a swifter impact on these numbers before the autumn.

5.8   With regards to the conditional data, the work being done on GMP reconciliation remains key in reducing error volumes. We expect to receive the output of this exercise from our sub-contractor (ITM) in July, and are looking to timetable the upload of this data in advance of next data quality score submission to the regulator.

Pension Dashboards

5.9   Members will be aware from previous updates that SYPA will need to be connected to the Pensions Dashboard which is a national initiative designed to allow all individuals to access a summary of all their pension scheme arrangements in one place. The staging deadline for the LGPS was originally set for 30 September 2024.

5.10   On 2nd March 2023, the Department for Work and Pensions announced a "reset" of the timeline for the Pensions Dashboard programme, citing technical issues in developing the core architecture into which individual pension funds will have to connect. A revised timeline is due to be announced before the House of Commons goes into summer recess on 20 July 2023. We do not yet know whether this delay will affect the staging date for LGPS funds but we are proceeding on the basis that it will not.

5.11   As set out in the previous report to the Board, SYPA requires an Integrated Service Provider (ISP) to facilitate the connectivity to the national Dashboard infrastructure. Discussions continue to take place with potential ISP providers.

5.12   Notwithstanding the delay to the programme, it remains important for pension funds to prepare for the Dashboard by checking and improving the quality of the data that will be required to meet our obligations to the Dashboard programme. Consequently, we will continue to further develop DART over the coming months to measure the quality of the data held on SYPA records and take remedial action where necessary. This analysis and actions taken will form part of the future reporting of the Data Quality Improvement Plan.

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6   Implications

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

Financial	None directly but there may be costs associated with any required data cleansing activity
Human Resources	None
ICT	None
Legal	SYPA has a statutory obligation to submit a data score to the Pensions Regulator.
Procurement	

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Interim Assistant Director - Pensions

Background Papers	
Document	**Place of Inspection**