



North Yorkshire Pension Fund

~~North Yorkshire Pension Fund~~ Data Improvement ~~Strategy and Plan~~ ~~November 2019~~ April 2025



Local Government
Pension Scheme

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Introduction

This document outlines [the North Yorkshire Pension Fund's \(NYPF\) \("the Fund"\) Data-data Improvement improvement Strategy & Planplan](#).

~~Fundamentally, the~~The purpose of the Fund is to pay the correct pension benefits to its members when they become due. It is therefore important that the Fund achieves and maintains the highest possible data quality standards, to comply with its core functions and to ensure the cost-effective use of resources. High quality data is also the basis for all fund valuations and effective decision making.

Keeping and maintaining high quality data is becoming increasingly difficult due to the ~~continual diversification of the participating ever changing~~ employer base, the increasing number of payroll providers, the large number of members and the complexity inherent in the scheme's design. However, the Fund is committed to meeting these challenges by using the approaches outlined in this [strategyplan](#).

Legislative Framework

The Fund and its employers have a legal obligation and statutory duty to comply with various regulations, standards and formal guidance; these include, but are not limited to:

- LGPS Regulations 2013, as amended;
- Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014;
- ~~The~~ Pensions Acts [1995, 2004 and 2008](#);
- The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013;
- Data Protection Act 2018;
- Freedom of Information Act 2000;
- Pensions Regulator's [General Code of Practice No.14](#)

This document considers the requirements of these different pieces of legislation in determining the Fund's approach and its priorities.

Plan objectives

The key objectives of this plan are:

- To ensure accurate records are maintained to calculate pension entitlements and employer liabilities; ensuring all information and data is communicated securely and accurately, within prescribed timescales.
- To ensure that the Fund is compliant with legislation ~~and in particular, with including~~ the [guidance of the Pensions Regulator's \(tPR\) guidance](#). ~~Furthermore, in doing so, ensuring~~ [Ensuring that it establishes a robust, reviewable and transparent framework necessary for the acquisition-collection and upkeep maintenance](#) of accurate, complete and up-to-date records [is in place](#).
- All actions agreed are proportionate to the risk posed, [are](#) cost effective and efficient. As part of this, appropriate technology will be used wherever possible to improve data quality standards and the streamlining of operational processing ~~across employer and Fund workstreams~~.
- To focus on making sure the Fund data is correct at source by using preventative approaches wherever possible ~~(section 4). Data cleansing activities should very much be used as a second line of defence rather than the main strategy to hold clean data.~~
- To ensure clarity of roles and responsibilities between the Fund and employers, ensuring all parties are committed to [continuing engagement to improve-improving](#) data quality and [promote-promoting](#) accurate record keeping.

- To ensure that all data collection processes are clearly documented and regularly reviewed to check the validity of data. ~~Internal m~~Managers will ~~act as a second line of defence by~~ periodically check ~~ing documented that~~ procedures are ~~being~~ followed ~~correctly~~ while an audit programme will be in place to ~~act as a third line of defence on~~ check controls, the collection and processing of data.

Obtaining good quality data

An essential part of any data improvement strategy plan is to ensure that good quality data is received and accurate processing takes place ~~to create new, accurate data items~~. The Fund's data requirements are ~~outlined within its template forms and employer's guide, both of~~ detailed in the Administration Strategy document and also on the employer section of the Fund's website ~~which are held on the website~~. Outlined in this section below are the approaches that the Fund will use.

Accurate and timely data submissions

~~The Fund is reliant upon~~ relies on the accuracy ~~accurate, completeness and timeliness of data provision from participating employers and any third party agencies~~ parties that they may utilise ~~e.g. payroll providers.~~

~~The Fund is fully reliant on complete and accurate data submissions from employers and they are the cornerstone of high quality data. Data submissions are provided monthly via the online employer portal as well as e-forms via the Fund's website. This ensures that data is received regularly throughout the year and is monitored in real time. This is mainly in the format of employer forms, monthly starter files and year end returns however~~ We, ~~there are other forms of data submissions where the data sources are a third party also receive data from other sources such as, but not limited to, other funds pension schemes and NYPF members themselves.~~

The Fund monitors that the performance levels and timescales set out in the Administration Strategy are being met. Where these are not being met, further action will be taken in line with the protocols stated and the Fund's Charging Policy will be used where other approaches have failed. Employers' performance measured against the standards set out in the Administration Strategy, will also be reported to the Pension Fund Committee.

~~Further information on how the Fund will address these data submissions is provided below.~~

~~The Fund will be looking to purchase a software package to facilitate online monthly employer returns and a key part of our ongoing data improvement plan is to rollout the use of this across the Fund's current and future participating employers. The software acts as a portal which sits between employers and the Fund and it helps ensure the data submitted passes a high number of data validation checks before it is uploaded. This will reduce the risk that poor quality data enters the system and discrepancies arise between employer's payroll software and the Fund's administration system.~~

Employer training, engagement and support

~~The Fund is reliant upon the accuracy, completeness and timeliness of data provision from participating employers and any third party agencies they may utilise e.g. payroll providers.~~

To maintain complete and accurate records there needs to be a continual dialogue with participating employers regarding the provision of data, particularly as employer contacts change. ~~The Pensions Employer Relationship Manager, and their team, Team will work with named employer representatives throughout the year to provides support the general activities of the Fund, clarifying information and data provided and actively seek to train employers and training to employers on all aspects of pension's administration as necessary required. It is an employer responsibility to both~~ Employers are responsible for provide providing accurate data and to provide resources to respond to ad hoc enquiries, bulk data activities such as year end data submissions and data reconciliations responding to queries in line with the timescales set out in the Fund's Administration Strategy.

The Fund will regularly reviews and improve updates all the material information available to its employers, either on the website or via email. such as the employer guides, employer's website portal and continue to

provide other supplementary information through the mediums of newsletters, forums, the Administration Strategy, the website and email communications.

Clear data submission templates and forms and timely delivery

The Fund recognises that due to the nature of the Scheme, it has relatively complex and time-consuming data requirements and it has a responsibility to ensure that its templates and forms are as simple as possible to understand and complete. As part of a current project undertaking a review of repeatable processes, the Fund will analyse where errors and misunderstandings often occur in relation to its forms, letters and other templates, and make adjustments wherever possible to reduce the frequency of this occurrence by supporting employers.

Furthermore, the Fund needs to ensure the timescales outlined in the Administration Strategy are met to ensure the timely delivery of data by following the protocols stated within it and that it uses the Fund's Charging Policy, where necessary, if other approaches are exhausted.

Effective internal controls and processes

All processes must be underpinned by suitable documentation, staff training and skills transfer to ensure ownership, understanding and compliance at both a Fund and employer level. As the Fund processes source data, it ~~needs to~~ will ensure that the new data ~~it creates~~ created is also accurate. It ~~will do~~ does this by making sure ~~that~~:

- clear and up to date procedures are in place and are being followed
- the pension administration system is up to date
- any 'known errors' are communicated to ~~processors~~ staff
- processes are adjusted where necessary
- relevant managers undertake regular reviews of the work being processed
- recommended improvements are identified and made where necessary

Timely receipt and processing of data - Processing Data

Another key element of ensuring data is accurate is for the Fund to receive and process data in a timely manner. The Fund ~~will aim to ensure it~~ aims to always ~~has~~ have appropriate resources in place, ~~to ensure~~ work is prioritised appropriately and any ~~mounting data~~ potential backlogs ~~are~~ is quickly identified ~~with and~~ a plan put in place ~~for reducing the backlog~~ to reduce it.

The Fund's ~~desired processing performance levels~~ targets are ~~outlined set out~~ in the Fund Administration Strategy while Disclosure Regulations and guidance issued by other bodies, ~~such as CIPFA,~~ provides further requirements and guidelines. ~~The Administration Strategy contains a set of Key Performance Indicators (KPIs) which Officers and the~~ The Pension Fund Committee ~~will monitor~~ monitors performance ~~against the targets against and~~ Officers ~~officers~~ will ~~put plans in place~~ take corrective action where ~~KPIs these~~ are not being met ~~and specific action is required to address the matter.~~

Fund Administration Strategy

The Fund ~~will review~~ reviews its Fund Administration Strategy annually to make sure it is up to date and fit for purpose. It contains a detailed overview of Fund and employer responsibilities, performance standards and ~~the~~ escalation policy. The Fund ~~will~~ also actively monitors ~~employers~~ -as well as its own performance against the ~~details contained within the~~ Strategy and takes ~~appropriate actions~~ if issues arise.

Maintaining good quality data

Whilst the Fund ~~will~~ always strives to obtain good quality data ~~at source~~ and process it accurately, inevitably there will be ~~scenarios~~ ~~times~~ where the Fund ~~will become~~ ~~becomes~~ aware of ~~out of date and~~ incorrect data ~~at a later date and these inaccuracies will~~ ~~which will~~ need to be ~~proactively identified and rectified~~ ~~corrected~~. The Fund ~~will do this by using~~ ~~uses~~ the ~~following~~ approaches ~~below~~:

Data Reconciliations:

A brief summary of key data reconciliation exercises that the Fund will undertake are outlined below.

Review Activity	Monitoring Performance Actions
<p>Following year-end contribution return exercise, the Fund will provide employers with a detailed review of errors and data gaps encountered during the process. <u>Monthly data quality checks</u></p>	<p>The Fund will monitor progress against resolution of errors. Where errors are not resolved within timescales prescribed within the Fund's Administration Strategy, employers may be subject to the Fund's escalation/charging policy for unsatisfactory performance. <u>Suite of data reports run monthly against pensions database.</u></p> <p><u>Inconsistencies identified and data corrected as appropriate:</u></p> <ul style="list-style-type: none"> <u>Employer contacted if necessary</u> <u>Correct data received</u> <u>Record updated</u> <u>Report updated to show record corrected</u> <p><u>Patterns of data errors identified and corrective action taken:</u></p> <ul style="list-style-type: none"> <u>Employer contacted if necessary</u> <u>Training and support provided to employer</u>
<p>The Fund will undertake an annual data reconciliation exercise to ensure there are no inconsistencies. <u>Annual reconciliation between the pensioner payroll and system and pension administration system records.</u></p>	<p><u>Data quality reports will be produced to analyse the data and monitor improvement. The data quality reports will be consistent with the Service Level Agreement between the two service areas.</u> <u>Reports run to extract and compare pension values between payroll and administration records.</u></p> <p><u>Identify and investigate differences.</u></p> <p><u>Correct either the payroll or administration record, whichever is incorrect.</u></p> <p><u>Apply pension increases, then recheck records.</u></p> <p><u>Identify and pay any underpayments.</u></p>
<p><u>Annual Benefit Statements</u></p>	<p><u>Generate annual benefit statements on every active and deferred record.</u></p> <p><u>Manual check of test population undertaken.</u></p> <p><u>Exceptions are also checked.</u></p> <p><u>Year to year comparison of pre 2014 service.</u></p> <p><u>Any data inconsistencies identified are corrected and annual benefit statement reproduced.</u></p>
<p>Individual member processing</p>	<p><u>Data checked for reasonableness before processing undertaken.</u></p> <p><u>Queries raised with employers as required.</u></p> <p><u>Data corrected when answers received</u></p>
<p><u>Academy conversions and new employer admissions</u></p>	<p><u>Membership data checked and reconciled pre and post transfer.</u></p> <p><u>Differences queried with relevant party.</u></p> <p><u>Data corrected when answers received.</u></p>
<p><u>Major project work e.g. McCloud remedy, Pensions Dashboard, etc</u></p>	<p><u>Data checked for members affected by the specific project.</u></p> <p><u>Queries raised with relevant parties.</u></p> <p><u>Data corrected when answers received.</u></p>
<p><u>Pre triennial valuation data cleanse</u></p>	<p><u>Valuation data extracted and provided to the Fund's Actuary.</u></p> <p><u>Actuary runs data through their validation software and provides an error report.</u></p>

	<p><u>Error report worked through in priority order, high impact to low impact cases.</u></p> <p><u>Queries raised with employers as required.</u></p> <p><u>Data corrected when answers received.</u></p>
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Using Third Party Data Services

The Fund ~~will make use of~~ uses third party data services to improve the quality of its data and also support the ~~administrative~~ administration function. ~~These are provided by outside organisations as either collaborative ventures (at no or minimal cost) or procured commercially.~~ The Fund uses these approaches where it ~~either~~ does not have access to the necessary information or it is able to benefit from the specialist services ~~of an outside company provided.~~

LGPS National Insurance Database and 'Tell Us Once' Service

The secure National Insurance Database was developed for Local Government Pension Scheme (LGPS) administering authorities to share data to prevent the duplicate payment of death grants and to check eligibility to a refund of employee pension contributions. ~~This follows changes to Scheme Regulations in 2014, by virtue of which, payment of a death grant in respect of a member with entitlement to multiple membership categories is restricted to an aggregate payment value in relation to any active or pensioner/deferred membership. When processing the death of a scheme member,~~ Officers will check the LGPS National Insurance Database for the existence of membership at other LGPS Funds when processing member benefits.

The ~~secure~~ LGPS National Insurance Database also ~~facilitates~~ enables the integration of the Fund's membership ~~profile~~ into the government's 'Tell Us Once' service, as administered by the Department ~~of for~~ Work & Pensions (DWP). The 'Tell Us Once' service allows a person registering a death to request that the DWP pass on the deceased's information to other government departments and council services. ~~If the deceased is a member of the Fund, as determined by the LGPS National Insurance Database, the~~ The Fund ~~will identify~~ checks the Tell Us Once portal ~~this on a daily basis~~ by reviewing notifications on the data portal for notifications of member deaths.

~~The use of the NI Database has broadened too and we also now use this to check if scheme members have other LGPS service for transfers and whether a frozen refund payment can be made.~~

Address Tracing Services

~~Accurate Data Services~~ The Fund uses a third party ~~provides~~ a member tracing service which enables Officers to ~~find~~ obtain the most recent ~~postal~~ address of any members ~~with whom~~ where contact has been lost. ~~For addresses, the~~ The loss of contact will normally occur when a ~~deferred or pensioner~~ member ~~fails to~~ doesn't notify the Fund of a change of address. Where ~~an item of mail has been~~ is returned for a pensioner, address tracing is essential in re-establishing contact so payment of their benefits ~~as promptly as possible~~ isn't disrupted.

An annual member tracing exercise is undertaken across the deferred members of the Fund to establish their current address. Tracing emails and letters are sent to obtain updated details where necessary.

Mortality Screening Services

~~A service provided by Accurate Data Services again~~ The Fund uses a third party, ~~to complete~~ monthly screening of pensioner and dependant records ~~the Fund engages monthly in comparing its dependant and pensioner memberships~~ against ~~their~~ a mortality database to establish potentially deceased members, minimising the likelihood of ~~pension over payments~~ over paid pensions.

Biennial screening of deferred members is also undertaken. Any members identified as potentially deceased are followed up via the general register office and next of kin where appropriate.

National Fraud Initiative (NFI)

Administered by the Cabinet Office, the NFI programme is a biennial exercise that matches electronic data within and between public and private sector bodies to prevent and detect fraud. ~~As a participant to this,~~ Veritau carries this out on behalf of the Fund ~~and they who~~ receives a report of 'matches' to investigate, to take remedial actions and update membership records accordingly.

Member self-checking

The Fund ~~always~~ encourages members to review the data ~~provided on~~included in communications ~~sent to them both on the communication itself and as shown on Member Self Service~~ and on their online pension records. The Fund will also continue to develop its standard letters and templates to make it clear what data it has relied upon to perform calculations. ~~Examples of relevant communications are Annual Benefit Statements & Membership Certificates.~~ Where discrepancies are found members are encouraged to contact either their employer or the Fund to have the data verified or corrected.

Improving current data quality

The Fund has identified a number of areas of new or continued focus for data improvement and maintenance. These are outlined in Appendices 1 & 2. ~~The specific sub-plans for each of these areas will be produced by the Fund, maintained internally and detail the specific actions required and the timeframes for resolution.~~

As new areas of focus are identified, and existing areas dealt with, new ~~sub-plans~~ activities will be added and ~~worked upon~~ actioned by the Fund's Development and Processes Team.

The Fund also ~~operates~~ periodically runs a suite of data cleansing reports ~~that are run periodically as scheduled by the Processes team~~ to identify data inconsistencies ~~between data items held within the administration database system and acts as an in-house programme to review and improve the data.~~ These reports are shown in Appendix 3. ~~When found, all~~ All data errors are reviewed and corrected to ensure continual data improvement. ~~and the number of errors found and the action taken is recorded.~~

Measuring success

The Fund's key measures of success are:

- ~~Key Performance Indicators (KPIs):~~ Performance Targets: ~~As referred to earlier within this plan above and as outlined in the Administration Strategy which will be reviewed updated from time to time annually.~~
- Percentage of Annual Benefit Statements sent on time: ~~The percentage sent by 31 August of each year. The official target statutory requirement is 100% to be issued by 31 August each year. and tHowever, the Fund's will not issue any statements where the data is known to be incorrect. target is to be as close to 100% as possible.~~
- **tPR's common and conditional (scheme specific) data targets:** tPR sets targets of 100% for both common and conditional (scheme specific) data ~~although the exact definition of conditional data for the LGPS has yet to be confirmed by the Scheme Advisory Board.~~ tPR acknowledges that complete, accurate scheme records are a vital part of the administrative administration function. tPR defines two types of data held in scheme records. Both types of data are equally ~~important, but~~ important but are defined separately for the purposes of measurement by tPR.
 - **Common data:** A list of 9 basic Data-data items which are used to identify scheme members and should be held by all schemes. This includes names, addresses, National insurance-Insurance number, date of birth and other similar data. The data must be present and accurate for all members being assessed.
 - **Conditional data:** Data which is essential to calculate benefit entitlements for the LGPS such as, member contributions, pensionable pay & service history. It also encompasses data relating to events that occur during an individual's membership, for example transfers, purchase of additional pension and pension sharing orders.
- ~~a) Key Performance Indicators (KPIs): As referred to earlier within this plan and as outlined in the Administration Strategy which will be updated from time to time.~~
- ~~b) a) Percentage of Annual Benefit Statement sent on time: The percentage sent by 31 August of each year. The official target is 100% and the Fund's target is to be as close to 100% as possible.~~

Plan review and monitoring

The Fund ~~will review~~ reviews this ~~policy document~~ plan annually periodically, and as required, to reflect changes in regulations and ~~f~~ Fund working practices. Scrutiny and oversight will be provided as and when is required by the Local Pension Board, the Pension Fund Committee, ~~the Pensions Regulator~~ TPR and internal and external auditors.

Related ~~Policy Statements~~ Documents

The following related documents can be found on the Fund's website:

- Administration Strategy
<https://nypf.org.uk/member-info/about-the-pension-fund/pension-fund-policies-strategies/>
- Employer Charging Policy
<https://nypf.org.uk/employers-only/governance-of-the-fund/>

Appendix 1: Data Improvement ~~sub-plans~~ – resolving existing, identified data issues (section 5)

Area	Data area	Potential impact	Mitigation	Review frequency
Addresses	Member a Addresses, particularly deferred members and those reaching retirement age.	Unable to contact members or dependants to advise them their benefits are due. Possibility of failure to identify survivor benefits which are due and other related issues. Incorrect addresses also count as failures against tPR's common data score.	When any posted mail is returned, the details are passed on to Accurate Data Services to steps are taken to -trace the person and obtain a current-up to date address if all other methods of tracing have been exhausted. <u>Methods used include Orbis trace, third party tracing company and the DWP.</u>	Ongoing, as and when required. <u>Biennial tracing of deferred members.</u>
Employer	Consistent membership data between employers and the Fund.	Inability Unable to ensure accurate payment of benefits within prescribed statutory timescales. Potential additional administration and legal costs to correct historical errors.	The actions outlined in sections 4 & 5 above.	Ongoing.
GMPs	To ensure that GMP data and residual pension splits are accurate.	Incorrect GMP liability values will consistently lead to the incorrect value of benefits <u>being</u> paid.	Continue to engage with HMRC to rectify GMP data. Check HMRC GMP checker website for correct values. <u>GMP reconciliation and rectification project completed.</u>	Ongoing <u>as cases arise.</u> GMP rectification scheduled to be completed by 31 January 2020.
Consistency errors	Technical data inconsistencies within member records on the pension administration system database.	Incorrect data configuration leads to benefit calculation failure & reduces the effectiveness of the administration of the Fund.	Training staff to ensure that data is applied <u>uploaded</u> to the database in a way that is consistent with the supplier's guidance, on the management of the database.	Ongoing.
Backlog processing	Backlogs currently exist for work related to aggregation and deferment of records. There are <u>currently no backlogs.</u>	<u>Backlogs result in processing delays, potential member complaints, reputational damage and inefficient processing.</u>	Reallocation of resource. Monitor workload position regularly. Reassign resource as required. <u>Anticipate and plan for periods of high demand.</u>	Ongoing.
<u>Unresolved data errors and inconsistencies</u>	<u>Data issues that cannot be resolved either because:</u> <u>1. it is historical and the data has not been retained.</u> <u>2. the employer has failed to fully answer the query.</u> <u>3. the member is unable to provide the information.</u>	<u>Unable to provide accurate information.</u> <u>Unable to pay accurate pension benefits.</u> <u>Impacts tPR's data score.</u> <u>Reputational damage.</u>	<u>Cases will be reviewed on an individual basis.</u> <u>Management team will decide appropriate course of action providing the best outcome for the member within the LGPS regulations. This could include the following:</u> <u>1. use information already available on the database.</u> <u>2. proceed without it if possible.</u>	<u>Ongoing as cases arise.</u>

			<u>1-3. request legal advice from Fund's lawyers if necessary.</u>	
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Appendix 2: Process and control strengthening – preventative approaches to data quality issues (section 4)

Area	Data area	Potential impact	Mitigation	Review frequency
Year end	<p>Year-end processes and controls:</p> <p>a). Correct allocation of CARE pay & FTE pay data to member accounts (where members have multiple accounts) through i-Connect submissions or manual/interfaced year end return templates.</p> <p>b). All CARE, FTE pay and other supporting data is correct and received in a timely manner set time frame for all records.</p> <p>c). Authorisation process for employers and any differences in contribution and membership data are fully reconciled.</p>	<p>Failure of Fund to fulfil its statutory requirement to ensure accurate payment of benefits within prescribed timescales. Impact on annual allowance calculations for members.</p> <p>Failure to provide accurate Annual Benefit and Pension Savings Statements.</p> <p>Failure to receive the correct contribution payments into the Fund.</p> <p>Failure to provide accurate data for the triennial valuation exercise.</p>	<p>a) Most Fund employers now submitting electronic monthly data to the Fund via i-Connect submissions. Continued liaison with employers who have yet to start using this functionality to move them over to this and continue to use annual return template with specified requirements. Admin Charging Policy amendment to encourage move to i-Connect submissions. All new Fund employers are automatically set up on i-Connect for data submission.</p> <p>b) Continued development of “sanity” checks on FTE and CARE pay data submitted, CARE pay versus the contributions received for that member/post</p> <p>c) Fund pay and contribution tolerance levels are set at individual employer level in i-Connect and flag warning prior to submission.</p> <p>d) Provide and identify any specific employer training that may be required.</p> <p>e) Descriptive feedback to employers where anomalies are highlighted from month 12 data checks</p> <p>f) Robust authorisation controls i-Connect data submissions and year end submission sign off by key employer contacts noted on authorised signatories list.</p> <p>g) Regular analysis of FTE Pay figures and CARE Data.</p> <p>h) Monthly i-Connect contribution reconciliation report sent to Fund Finance Team to reconcile with payments being received into bank account and monthly contributions return workbook they receive.</p> <p>i) Pre valuation exercises to review quality of Fund data prior to actual valuation of the fund so any highlighted issues can be rectified ahead of this.</p>	Annually

			<p>J) <u>Automatic reminders issued by i-Connect to advise an upcoming submission is due or to notify of late submissions to ensure on time returns.</u></p> <p>K) <u>i-Connect tracks members it expects a return for, if a submission is not made for a post this will appear on an omitted members list presented to the employer which requires resolution/explanation.</u></p> <p>a) <u>Continued liaison with employers and development of annual return template and requirements</u></p> <p>b) <u>Continued development of “sanity” checks on pay data submitted</u></p> <p>c) <u>Regular revision and improvement of Fund pay tolerance levels</u></p> <p>d) <u>Descriptive feedback to employers where anomalies are highlighted</u></p> <p>e) <u>Robust authorisation controls including sign-off by key employer contacts.</u></p> <p>f) <u>Regular analysis of FTE Pay figures and CARE Data.</u></p> <p>g) <u>Long term - transition of employers to monthly online submissions once functionality is in place</u></p>	
Pensioner payroll	<u>Annual reconciliation between the pensioner payroll and administration records. Verification and rectification of pension payments between the Pension Administration database and the Pension Payroll database.</u>	<u>Failure to reconcile members & their pension values could will lead to maladministration incorrect payment of benefits.</u>	<p><u>Financial reconciliation of the pensioner payroll before and after each pension increase exercise.</u></p> <p>a) <u>Initial programme for rectifying databases (currently ongoing with ITM)</u></p> <p>b) <u>Incorporate a series of annual pre-pension increase checks to ensure both databases mirror each other.</u></p> <p>c) <u>Initiate a programme of data quality reporting & reconciliation.</u></p>	Annually, — Financial reconciliation of the payroll before & after each pension increase exercise.
Consistency errors	Data entered on the <u>pension administration system database</u> needs to be entered consistently and checked as part of <u>the member processing</u> .	Non-verification of data from <u>3rd third parties</u> such as other LGPS <u>funds</u> may have <u>a financial or data quality consequences impact.</u> <u>Entering data inaccurately can lead to incorrect payment of benefits.</u>	Ensure that all <u>transfer value data</u> is verified <u>on the administration system, by reviewing their documentation & prior to updating</u> each member's record, <u>s as required.</u> <u>Processing is peer reviewed before communications are issued and benefits are paid.</u> <u>Ensure Run consistency check routines are run regularly.</u>	Ongoing.

Appendix 3: Data Cleansing Reports – identifying and resolving data issues (section 6)

Category	Process / Data Field	Pensions Regulator Comments	NYPP Comments	Frequency
Conditional TPR	Pension sharing details	If a member has had a pension sharing order, check that full details of the benefits transferred to the ex-spouse/ex-civil partner are present.	Manual check of Altair records for Pension Debit and Credit members compare the figures on the member's record to the figures on the ex-spouses and check against ABS figures.	Annually
General Data cleansing	X-d-out records	NA	A check needs to be done mid-May for any records that have been x-d-out on Basic Details but where the task has been closed down.	Annually
General Data cleansing	Missing penrem and conts	NA	Report: NOPENREM Run report before year end to clean up last year's penrems/conts. Also check for any blank salaries, default salaries (£1000 or £10000) and that within sensible minimum/maximum boundaries (£10000 – £200000).	Annually
General Data cleansing	Verification of CARE record	NA	Report: CAREVERI – Run report after year end postings have been completed to identify any active record with missing CARE information.	Annually
Common data TPR	TEMPNI	'TN' formats should be regarded as missing data. The final character of NI numbers is not essential.	Report TPR – Use filter on NI number to isolate those records that contain 'TN' or are blank.	Biannually
Common data TPR	Membership status	Check that a current valid status is recorded for each member. This may be a dual status, e.g. active or deferred member with partial retirement. For contract-based schemes this may be 'active' or 'inactive'.	Report: TPR – Use filter on status to identify any status 2 or 8 records. Investigate and amend where necessary.	Biannually
Common data TPR	NOSEX	Check that sex is present.	Report TPR – Use filter on Sex to identify 'blanks'.	Biannually
Common data TPR	Postcode	Check that a postcode is present if address is not identifiable as being overseas. Will assist with valuations for actives, for whom storing full address may breach DPA principles.	Report: TPR Use data filter on post code to find blanks. All data will be corrected using either the Royal Mail's Postcode finder web page or 118 information (available through NYCC).	Biannually

Common data TPR	DOB	Check that date of birth is present and consistent (earlier than date joined scheme, retirement, date of leaving). False dates should be classed as missing data.	Report: DOB1950 will be run every 6 months. This identifies any dummy dates of birth (1/1/1950) used when the Altair record was created. Altair performs its own checks when creating a new starter record so any dob that wasn't consistent (earlier than date joined scheme, retirement, date of leaving) would not be accepted.	Biannually
Common data TPR	DOB	Check that date of birth is consistent (earlier than date joined scheme, retirement, date of leaving). False dates should be classed as missing data.	Report: DOBVSDJF will be run every 6 months, this will identify any record where DOB is greater than DJF.	Biannually
Common data TPR	DJF	For trust based schemes this will be date pensionable service started. For contract based schemes this will effective start date of the policy or the first contribution date, depending on the provider's requirements.	Report: DJF will be run every 6 months. This will identify any gaps in date joined fund.	Biannually
Common data TPR	Last status event	Check that benefits taken are consistent with status, and, if status history is recorded, that the latest status is the same as the explicitly recorded current status.	Report: STCHECK will ensure st4 records have deferred details screen and st5 records have pension details screen.	Biannually
Common data TPR	Address	An address should be present for all members of all schemes. Because of DPA requirements an exception is permissible for active members of those trust based schemes in which communication with members is normally sent via the employer. 'Gone away', 'unknown' or similar should be treated as missing data.	Report: GAWAY2 will be run every 6 months to identify any members with a 'gone away' indicator. Addresses will be tracked using Experian, or, if the member is active, through their employer.	Biannually
Conditional TPR	Active record	Check that an active member does not have a date of leaving. Computer systems need to recognise that active members who have taken partial retirement, or who have had more than one period of membership of a scheme, may have deferred and/or pensioner records but no date of leaving.	Report: ST1LEFT will be run every 6 mths to identify any active members with a date of leaving present.	Biannually
Conditional TPR	DOL	For trust based schemes check that member has a date of leaving which is after date joined scheme, and that member status is not active if date of leaving is present.	Report: ST45LEFT will be run every 6mths to identify deferred and pensioner records with no DOL.	Biannually

Conditional TPR	Benefit crystallisation event details	Check that full details of the dates and amounts paid at each benefit crystallisation event, including details of LTA percentage used, are present.	Report: CRYSTNOT. Will identify any pensioner record with crystallisation data view but no % LTA used.	Biannually
Conditional TPR	Earmarking order details	If an earmarking order has been made, check that details of any benefits to be paid to an ex-spouse/ex-civil partner are recorded.	Search for Divorce Earmarking data view through Member Interrogation – no records usually. (See notes in Divorce Earmarking folder in N:\FCS DATA\TECHTEAM\Record Keeping TPR).	Biannually
General Data cleansing	Inconsistent Nomination Details 2	N/A	Report: NOMTIDY2 Finds inconsistencies between basic details and nomination details.	Biannually
General Data cleansing	T01 Records	N/A	Report: T01REC This will find any T01 record in Altair. The output needs to go to the relevant PBOs'/G1ers (who created the T01 record) so they can let us know if it can be deleted.	Quarterly
General Data cleansing	Correct Marital Status	To check that a DOD or dummy DOD is present for ST 1 & ST 4 members with the Partnership Status 'D'. And to check that all records have a marital status present.	Report: DIVORCE Extract and filter the output and this can be used to find any ST 1 or ST 4 record with no DOD or no marital status present. Filter no longer required on Status as Reportwriter now only extracts Statuses 1 and 4.	Quarterly
General Data cleansing	To identify Mismatching Idents	N/A	Report: IDNTMTCH Run report to identify miss matching IDENTs, HBC will have to be run differently to rest of employers (report: HBCIDNT).	Quarterly
General Data cleansing	To identify blank user defined data views and incorrect/miss-spelt report items	N/A	Report: UDDETAIL Run report then output into excel and use data filters to identify blank data views and incorrect/miss-spelt report items.	Quarterly
General Data cleansing	Blank Data Views	N/A	Report: EMPTY Run report to identify any blank data views which can then be deleted in Altair.	Quarterly
General Data cleansing	To identify Cont Rate Mismatches between cont rate and that recorded on cont rate list.	N/A	Report: CONTRATE Run report then output into excel, use data filters to highlight inconsistencies and make amends to Altair.	Quarterly
General Data cleansing	To identify marital Status and Title Mismatches.	N/A	Report: MARSTAT Run report then output into excel, use data filters to highlight inconsistencies and make amends to Altair.	Quarterly

General Data cleansing	To identify married Deferred Members with no CSP on record with a Deferred date before 02/04/2008.	N/A	Report: DEFMCS Run report then output into excel, go through output and make amends to Altair.	Quarterly
General Data cleansing	To pick up P or S marital status deferred records with 0.01 in requisite benefits and spouse's requisite pension on Deferred and GMP details DV.	N/A	Report: STATUS4 Run report then output into excel and use data filters to identify single of declared partnership members with 0.01 in both fields.	Quarterly
General Data cleansing	Inconsistent Nomination Details	N/A <hr/>	Report: NOMTIDY1 Run report to identify all Nomination Screen anomalies i.e. '%' signs, incorrect fields completed etc... against all records	Biannually
General Data cleansing	To identify unlinked members for members with more than one post	N/A	Report: Run member extract individually against actives, Deferreds, pensioners and dependants. Anyone who appears more than once is an un-linked member	Biannually

Appendix 3 – Decision Log for correcting incorrect data items

Data items and issue	Reason unable to correct	Decision maker	Outcome	Reason
Service histories during McCloud remedy period missing or inaccurate.	Historical data no longer held by employers.	Phillippa Cockerill Head of Pensions Administration	Hours calculated from CARE/FTE x 37 for each year or part year in remedy period.	Unable to get data from employers. Pragmatic and most accurate method of arriving at hours worked position.