CRONFA BENSIWN
POWYS
PENSION FUND

Data Improvement Plan

October 2024

1.   Introduction

1.1   In 2015, the Pensions Regulator (TPR) assumed responsibility for Public Sector Pension Schemes. Prior to this, in June 2010, TPR issued guidance on the approach that they consider to be good practice for measuring the presence of member data. Specific targets were set for inclusion in the 2018 TPR report for data that TPR deemed as 'common'.

1.2   In March 2018 Powys Pension Fund commissioned a complete review of the administration system's common pension data in line with the guidance notes set down by TPR. This exercise is conducted annually as part of the TPR Annual Return, but the Fund now has the option of increasing this frequency to ensure regular monitoring.

1.3   The Fund has carried out data cleansing exercises and checks periodically in the past as part of year-end exercises and triennial valuations. These exercises checked data provided by employers and data held on Scheme Member records.

1.4   In continuing efforts to improve the quality of its data, Powys Pension Fund is moving towards receiving 100% of its employer data monthly in an electronic format, with currently over 90% of active Scheme Member data now collected on a monthly basis direct from Employer payroll systems via the i-Connect facility. Currently 70% of the Fund employers submit data electronically monthly.

2.   Benchmark and Aims

2.1   TPR have set targets of 100% accuracy for data created after June 2010 and 95% accuracy for data created beforehand.

2.2   This Data Improvement Plan aims to address the data issues that are identified during the data review exercises. It will set out the steps that the Fund will take to tackle the issues and improve the quality of the data that it holds in a continuous basis, with a view to achieving the highest quality of data possible.

3.   Objectives and Measures

1) **To ensure accuracy in the quality of data held on scheme member records in order to facilitate accurate and timely payment of pension benefits.**

    This will be achieved and measured through continuous reviews of data quality testing, through audit testing and checking against published service standards.

2) **To improve compliance with The Pensions Regulators (TPR) General Code of Practice.**

This will be achieved and measured by a continuous review against the Code and improvement of scores in the TPR Compliance Monitoring Document.

3) **To decrease the number of 'gone away' addresses held for Scheme Members**

This will be achieved by undertaking periodic member tracing exercises.

4) **To ensure high quality data for valuation purposes and, therefore, increasing accuracy in valuation results with consideration given towards setting accurate employer contribution rates through accurate assessment of Fund assets and liabilities.**

This will be achieved through pre-valuation data cleansing exercises carried out with the Pension Fund Actuary and ongoing data quality testing via the administration system.

4.   Scope and Prioritising

The data quality reviews already undertaken, measured the data on the administration system against the two types of data categories that TPR require:

- Common Data
- Scheme Specific Data

The Common Data items are specific in the Pensions Regulators guidance and pension scheme data must be measured against:

Common Data item	Membership type tested
NI number	All members
Name	All members
Sex and Date of Birth	All members
Date Commenced and NRD	All members
Status	All members
Status and invalid data view	All members
Address	All members
Status and valid data view	All members

The data items tested for both Common and Scheme Specific Data are as follows:

Common Data item	Membership type tested
NI number	All members
Name	All members
Sex and Date of Birth	All members
Date Commenced and NRD	All members
Status	All members
Status and invalid data view	All members
Address	All members
Status and valid data view	All members

5. Data Correction Plan

Focus on data which has the greatest impact on member benefits will be prioritised, to ensure that correct benefits are being paid to scheme members.

Breakdown of activities for improvement - Common data

Data Category	Milestone	Priority
National Insurance (NI) Number	Obtain correct NI numbers for the members with temporary numbers or those in the incorrect format	High
National Insurance (NI) Number	Investigate as a priority the cases with blank NI numbers	High
Name	Obtain Forenames and Initials as required	Low
Sex and Date of Birth (DOB)	Obtain sex and DOB as required	Medium
Date commenced and Normal Retirement Date	Investigate the cases with a blank date joined fund as this could affect benefits	High
Status and invalid data view	Invalid data should be removed where necessary or the member status corrected where appropriate. These cases should be treated as a high priority as the presence of the data may affect benefits	High
Address	Current addresses should be sought and uploaded for the members that failed this category	Medium
Status and valid data view	Members with missing data views that hold their entitlement should be investigated as a high priority and either their status corrected or the correct data recorded	High

Breakdown of activities for improvement - Scheme specific data

Data Category	Recommendation	Suggested Priority
Member Benefits	Investigate incomplete Transfer In and AVC data with the very highest priority as benefits may be incorrect	Very high
	Correct deferred benefit cases prior to running deferred annual benefit statements	High
	Investigate defects in pension benefits	Very high
	Investigate the Dependant Pension cases with small pensions	High
	Investigate cases with an incorrect Pensions Increase Date	Very high
Other Member Data	Investigate cases with an unexplained date of leaving present	Low
	Investigate members with incorrect Employer Details	Low
	Investigate final salary pay issues prior to running annual benefit statements	High
	Investigate cases with missing contributions prior to running annual benefit statements	High
	Investigate cases where date of leaving is blank or incorrect	High
Career Average Revalued Earnings (CARE) Data	Investigate all data issues in this category by status prior to issuing annual benefit statements for that status. Pensioners should be investigated as soon as possible to ensure correct benefits are in payment	High
	CARE data should be requested where missing	Very high
HMRC	Investigate cases highlighted with incorrect Benefit Crystallisation Event (BCE) data	Low
	Investigate cases with missing death grant data	Low
	Investigate cases with missing Annual Allowance data, particularly the scheme pays cases.	High
Contracting Out	Review and update Guaranteed Minimum Pension (GMP) values in conjunction with the GMP Reconciliation process	Medium
	Obtain and upload GMP figures for the members with missing data as a high priority	High

	Investigate cases with incorrect date of contacting out and NI contributions	Medium

6   Contacts

Any questions, queries or observations on this Statement or, on matters relating to the investment or governance of the Powys Pension Fund, should be addressed to:

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