

XXXXXX FRA

Data Improvement Plan

1. Introduction

- 1.1 This document defines the data improvement plan for XXXX Fire which is administered by West Yorkshire Pension Fund (the Fund).
- 1.2 The Fund collects and holds large amounts of digital and paper based data and is heavily reliant on the timely receipt of quality data from the Fire Authority, in order to effectively administer the Firefighters' Pension Schemes.
- 1.3 Fundamentally, the purpose of the Firefighters' Pension Scheme is to pay the correct pension benefits to its members when they become due. It is therefore imperative 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.
- 1.4 The legal requirements relating to scheme record keeping are set out in the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014.
- 1.5 The Firefighters' Pension Scheme continues to face ongoing legislative change with oversight of administration and governance now falling under the remit of the Pension Regulator, with a heightened responsibility on scheme managers and local pension boards to ensure data is readily available and fit for purpose at all times.
- 1.6 The Pension Regulators guidance requires that schemes should:
 - Continually review their data and carry out a data review exercise at least annually
 - Where a review of the scheme's data identifies poor or missing data a data improvement plan should be put in place to address these issues
- 1.7 Firefighters' Pensions England Scheme Advisory Board issued a publication on the 30/08/2018 covering the Pension Regulators (tPR) requirements. A copy of this publication can be found at Appendix C.

2. The Pensions Regulator Annual Scheme return

- 2.1 Annually the Pensions Regulator issues a scheme return which should be completed and returned. From 2018 each Pension Fund is required to include a Data Quality Score which has two types of data:
 - **Common data** – used to identify scheme members and includes name, address, national insurance number and date of birth.
 - **Scheme-specific data** – essential to calculate benefit entitlement such as pensionable pay and service history. It also encompasses data relating to events that occur during an individual's membership, for example transfers etc.

- 2.2 The tPR has issued a quick guide on measuring scheme data which states that one piece of missing data, such as a current address on a deferred member's record should be reported to them as a failed record.

3. Key Objectives

The key objectives of this plan are to:

- Ensure member records are maintained as accurately as possible to ensure benefits are paid correctly on time, members receive a high standard of service and the fund is able to meet legal obligations.
- Ensure administration costs are reliable/correct.
- Ensure data supplied for the scheme valuation is as accurate as possible.
- Ensure the Fund complies with tPR's Code of Practice.

4. Outcomes

Outcomes of an improvement in the data held by the Fund on behalf of the FRA are:

- Improvement of tPR data score for Common and Scheme Specific (also known as conditional) data
- Increase in the number of beneficiaries able to receive an Annual Benefit Statement (ABS) or aware of the value of benefits by 31 August.
- Reduction in the number of Internal Dispute Resolutions (IDRPs) received for incorrect calculation of benefits or delays in paying benefits
- Reduction in the number of queries received when ABS are sent out
- Reduction in administration costs
- Reduces the likelihood of Government Actuary Department rejecting data for the scheme valuation
- Improves accuracy for the IAS19 valuations
- Reduces breaches recorded by Fire Authority (e.g. due to ABSs being issued late)

5. Additional general responsibilities relating to the Data Improvement Policy

5.1 Fund Officers

- Fund officers continually review and ensure that data collection is fit-for-purpose and processes are in place to monitor accuracy and timeliness. All processes will have working instructions in place to assist with staff training, understanding and compliance.
- Team managers are responsible for ensuring that staff have the appropriate level of UPM access to fulfil their duties and that access is withdrawn upon the member of staff leaving the team. This minimises the risk of accidental loss, errors and unauthorised activity.

5.2 Fire Authority

- The Fund is reliant upon the accuracy, completeness and timeliness of data submitted by the Fire Authority.
- The Fund will work with each Fire Authority throughout the year to support the provision of data to the required standard.

6 Ongoing Data Cleansing

6.1 Monthly Returns data quality checks

WYPF embraced monthly contribution postings several years ago with the aim of simplification, systems integration, increased data accuracy and complete up to date member records. The benefits include ensuring that employee's contributions, member's personal details, and financial records are up to date, accurate and complete.

6.2 National Fraud Initiative

The National Fraud Initiative (NFI) matches electronic data within and between public and private sector bodies to prevent and detect fraud. These bodies include police authorities, local probation boards, fire and rescue authorities as well as local councils and a number of private sector bodies. WYPF submit data to National Fraud Initiative on a regular basis to identify deceased members and members who are no longer entitled to receive a pension.

6.3 Mortality screening and tracing service

WYPF engage with a Tracing Bureau for both monthly mortality screening and for members we don't have a current address for. For deferred members, where a current address for a lost contact cannot be found by the Tracing Bureau, a more detailed check is carried out 3 months before payment of pension is due.

6.4 Annual Benefits Statement checks

Before producing an ABS each year certain checks are applied to active records to ensure accurate data is used in the production of the ABS. These checks include:

- Ensuring contributions are received for every month during the year,
- Checks to make sure there are no spikes in care pensionable pay,
- Checks to ensure the final pay has not increased by 20% or decrease by 10%,
- Checks for ensure there aren't any outstanding processes,
- Address check to compare the address held on the record and that supplied on the monthly return

If these checks identify further information is required from the Fire Authority the ABS production for this case will be blocked and a query will be referred back to the Fire Authority. Upon receipt of the appropriate information the record will be updated and the ABS will be released for production.

6.5 Deferred pensions increase

As part of the annual deferred pensions increase process certain data errors are identified and pensions increase is blocked until they are resolved. These errors include:

- Incorrect elements present,
- Spouse elements that don't match member elements,
- Incorrect dates for the first entry after the member is deferred,
- Data errors are corrected to allow deferred pensions increase to run on to individual deferred folders.

6.6 Annual deferred benefit statements

Before producing the annual deferred benefit statements data errors that would result in potentially incorrect statements being produced are identified. These include:

- Deferred pensions increase not updated,
- Multiple 'normal payment' dates being held on the deferred folder,
- Multiple entries for the same date shown on the pension history screen,
- Initial entries on the pension history missing,
- Service start date mismatches.

Once these errors are resolved and the records is updated the deferred ABS will be released for production.

7 Data errors

When tackling data errors the following considerations will be used when making the decision on the priority of errors to be resolved:

- Priority identified on the error report
- Data improvement plans objectives

8 Frequency

Data Quality reports will be run on a quarterly basis to measure the data quality scores and identify any further action that may be required.

9 Appendices

- Appendix A details the Data Quality scores and errors
- Appendix B is the Data Improvement Plan
- Appendix C is a publication issued by Firefighters' Pensions England Scheme Advisory Board – TPR data requirements

Appendix A - XXXXX FRA – result at November 2019

1992 scheme	Nov 18	Nov 19		
Common	97.83	98.50		
Scheme Specific	88.45	86.52		
2006				
Common	86.71	91.61		
Scheme Specific	97.90	98.60		
2006 modified				
Common	98.80	97.59		
Scheme Specific	97.59	94.03		
2015 not modified				
Common	97.91	95.93		
Scheme Specific	75.57	97.90		
2015 modified				
Common	100.00	100.00		
Scheme Specific	86.67	100.00		

Breakdown of activities for improvement from November 18

	92	2006	2006 modified	2015	2015 modified	Total
Count of address missing (all non active)*	8	8	1	9		26
Count of missing or bad NI number				1		1
Count of surname or forename missing				2		2
Count of missing sex				1		1
Count of bad date of birth				1		1
Count of missing or bad expected retirement date				1		1
Count of missing CARE pay				1		1
Count of missing CARE benefit				137	2	139
Count of missing CARE revaluation Rate				137	2	139
Count of invalid PSO or sharing order	4					4
Count of invalid deferred payment date				1		1
Count of missing initial CARE pension (Def)				2		2
Count of beneficiary link to pensioner missing	61	2		2		65
Count of beneficiary type missing	61	2		2		65
Count of no deferment details		1				1

Breakdown of activities for improvement from November 19

	92	2006	2006 modified	2015	2015 modified	Total
Count of address missing (all non active)	7	12	1	14		34
Count of missing or bad NI number	1			1		2
Count of surname or forename missing				1		1
Count of missing sex				1		1
Count of bad date of birth				1		1
Count of missing CARE benefit				6		6
Count of missing CARE revaluation Rate				7		17
Count of invalid PSO or sharing order	4		1			5
Count of invalid deferred payment date				1		1
Count of missing initial CARE pension (Def)				2		2
Count of beneficiary link to pensioner missing	6					6
Count of beneficiary type missing	0					0

Data Category/ Issue	Category	Priority	Resolution required	Responsibility	Progress	Deadline
Address and postcode Missing	Common	Medium	Accurate Data Service engaged to carry out address tracing for deferred and preserved refunds members Mypension allows members to update their address	Service Centre	Ongoing	November 2020
Missing surname or forename	Common	Medium	Interrogate records and or obtain correct details from FRA	Service Centre	Ongoing	Nov 2020
Sex missing	Common	Medium	Interrogate records and or obtain correct sex from FRA	Service Centre	Ongoing	Nov 2020
Bad date of birth	Common	Medium	Interrogate records and or obtain correct details from FRA	Service Centre	Ongoing	Nov 2020
Expected retirement date	Common	Low	IT will do bulk update with correct dates.	Service Centre	Completed	30 April 19
Missing or bad Ni number	Common	Medium	Interrogate records and or obtain correct NI number from FRA/Member	Service Centre	Ongoing	30 April 20
Invalid PSO or Sharing Order	Scheme specific	Low	IT to alter the report so it does not pick up ex spouse surname	CRM	Ongoing	November 2021
Missing Care benefit	Scheme specific	High	Outstanding work in service centre.	CRM	Ongoing	30 June 20
Missing Care revaluation rate	Scheme specific	High	Outstanding work in service centre.	CRM	Ongoing	30 June 20
Missing initial Care pension (Def)	Scheme specific	Low	Moved into 2015 scheme but didn't receive any pay so nil CARE pension expected.	CRM	Completed	30 June 20
Invalid deferred payment date	Scheme specific	Medium	To investigate	CRM	Completed	30 June 20
Beneficiary Link to pensioner missing	Scheme specific	Low	IT to investigate if bulk identification and update possible.	CRM	Completed	30 November 2019

Beneficiary type missing	Scheme specific	Low	IT to investigate if bulk identification and update possible.	CRM	Completed	30 November 2019
No deferment details	Scheme specific	Medium	Interrogate records and update with correct data	CRM	Completed	30 April 19

This improvement plan primarily aims to address the key issues identified from the Funds Data Quality review and data quality score and details the plans in place to improve the data we hold.



Information

TPR data requirements

Background

For the first time in 2018, TPR are requesting that schemes measure the data they hold about their members and report this on the annual scheme return. To assist schemes in measuring their data, TPR have produced the following guide:

<http://www.thepensionsregulator.gov.uk/docs/measure-data-guide.pdf>

As you will be aware the scheme manager has responsibility for completing the scheme return and therefore for completing the data score analysis. While they may ask their administrator to perform the exercise, they should be aware that they will need to consider data that is needed but might not be programmed for within the pension software, i.e. various manual calculations or payroll information.

TPR have recently published a [checklist](#) for completing the scheme return, which is expected to be issued in September with a six-week turnaround for completion.

It is important to remember that data scoring should not be considered a test of software or administrators, rather it is a measure to ensure that data is provided accurately by employers and can be accessed appropriately when required in order to calculate members' benefits accurately.

TPR have confirmed that the first year of data-scoring will be used as a baseline to assess the current position of scheme data. It will be used to review the methodology adopted by each scheme in both selecting and measuring their scheme-specific data. Thereafter, a year-on-year improvement will be expected.

There are two different categories of data– common and scheme specific. Please see more detail below.

Common data

A list of 11 basic data items which are used to identify scheme members and should be held by all schemes. The data must be present and accurate for all members. However, data does not need to be measured where there is no further liability – for example the member has transferred out or received a refund of contributions.

Illustrative data requirements v1 30/08/2018

	Data item	Comment
1	National Insurance number	'TN' formats should be regarded as missing data. The final character of NI numbers is not essential.
2	Surname	Check that the surname is present.
3	First name or initials	Forenames are preferable but initials are an acceptable alternative. Check that one of these is present.
4	Gender	Check that a gender indicator is present.
5	Date of birth	Check that date of birth is present and consistent (earlier than date joined scheme, retirement, date of leaving). Inconsistent dates should be classed as missing data.
6	Address	An address should be present for all members. 'Gone away', 'unknown' or similar should be treated as missing data.
7	Postcode	Check that a postcode is present if address is not identifiable as being overseas.
8	Start date of pensionable service	Check that the start date is present and later than date of birth. False dates should be classed as missing data.
9	Membership status – e.g. active, deferred, pensioner	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 or member with transitional benefits.
10	Last status event - date and reason membership status last changed e.g. from active to deferred.	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.
11	Normal retirement date: <ul style="list-style-type: none"> 1992 Age 55 [Rule A13]¹ 2006 (Standard) Age 60 [Sched 1, Pt 2, Para 3] 2006 (Special) Age 55 [Sched 1, Pt 2, Para 3 (3)] 2015 Age 60 Rule 3² 	Need to check that it is populated, consistent with scheme rules and statutory requirements, and is later than date of birth and pensionable service date.

¹ For the 1992 scheme, you may wish to also hold earliest eligibility to pension benefits, i.e. 30 years' service

² As defined in the interpretations under 'Normal Pension Age'

Scheme-specific (conditional) data

Items which are required to run the scheme and pay accurate benefits. This will be different for each scheme, although there may be some similarities within types of scheme e.g. defined benefit, public service.

There will be variances in the data that system providers are able to extract from the pension administration system, and some data may not be held electronically at all.

Although TPR have produced some general guidance on measuring scheme-specific data, there are no particular guidelines for the Firefighters' Pension Schemes.

<http://www.thepensionsregulator.gov.uk/docs/record-keeping-guidance-conditional-data-table.pdf>

The LGA agreed that in order to achieve consistency and allow for benchmarking and best practice, a standard list of scheme-specific items for FPS should be developed. This has proven more difficult than initially imagined, particularly within the available timescales, as robust testing is needed not only of the data that the administrator holds, but also items which may not be recorded on software.

Therefore, rather than provide a definitive list of data elements, we have given some suggested items below. This is based on the GAD Universal Data Extract and TPR guidelines, subject to feedback from software suppliers and our knowledge of the Firefighters' Pension Schemes. The suggestions are split into categories for active, deferred, pensioner, and dependant members.

TPR understand that this will be a reiterative process and therefore, this project will be revisited once the results of year one are known and we can build a clearer picture of what is achievable and realistic. Scheme managers will be given opportunity to review the process following the return submission deadline.

The table below illustrates the 10 different types of member that exist within the FPS. When considering your return, bear in mind that not all of the suggested items will apply to every category of member.



10 different types of member

	Protected	Tapered	Unprotected	Transitional
1992 Scheme	✓	✓	X	✓
2006 Scheme (Standard member)	✓	✓	X	✓
2006 Scheme (Special member)	✓	✓	X	✓
2015 Scheme	x	x	✓	x

ACTIVE

	Data item	Comment
1	Current scheme – 1992, 2006 (Standard), 2006 (Special), 2015	Check that membership class is present, if it is required in order to define the class of membership, from which the scheme rules and benefits applicable to the member can be ascertained.
2	Protection status and transition date	Check that protection status and taper date are present and consistent with date of birth and date joined scheme. False dates should be classed as missing data.
3	Any previous FS scheme membership - 1992, 2006 (Standard), 2006 (Special)	Check whether transitional data exists and that the dates are consistent with the scheme parameters.
4	Employer	Check that employer name is present.
5	Date joined current employer	Check that date joined employing company is present and is later than date of birth. False dates should be classed as missing data.
6	FS actual pay (past 3 years – amounts and dates)	Check that a final salary pay based on actual earnings (e.g. part-time) exists for each of the last 3 years and is greater than £1.
7	FS pensionable pay (past 3 years – amounts and dates)	Check that a final salary pay based on FTE earnings or reference pay exists for each of the last 3 years and is greater than £1.
8	Reckonable service	Split as necessary to calculate benefits and reflect aggregated service. Check that total reckonable service is consistent with start date and hours.
9	Qualifying service	Check that a total amount of Q service is recorded and consistent with start date.
10	Transferred-in service	If benefits have been transferred in, check that all relevant details are recorded. This will include (as a minimum) the details of the previous scheme, the amount of the transfer value (split between protected rights and non-protected rights and, if relevant, split between the amount received in respect of member and employer contributions and AVCs), benefits secured, and (if relevant) contracting out details.
11	Purchased service (added 60ths)	Check that full details of any purchased service are present, including amount bought, and total payable, whether by lump sum or periodic contribution.
12	Part time indicator and % FTE	Both or neither should be present, check that this is consistent.

13	APB amounts (including CPD, LSI and temporary promotion)	Check that amounts paid, period dates and calculated APB amounts are present.
14	CARE pay from 01/04/2015 (or transition date)	Check that pay figures are present for each year of CARE membership from date of joining/ transition.
15	Accrued CARE pension from 01/04/2015 (or transition date)	Check that accrued benefit details are present if they are updated and recorded annually.
16	Annual revaluation percentage	Check that there is a history of revaluation percentage for the accrued pension for each relevant year.
17	PSOs/ Earmarking	If a member has had a pension sharing or earmarking order, check that full details of the benefits transferred/ to be paid to the ex-spouse/ex-civil partner are recorded.
18	Scheme pays debits	Check that details of any future scheme pays debits are recorded including amount of tax charge and annual pension debit.
19	Potential entitlement to two pensions (reduction in pay)	Check that date of reduction and previous higher rate of pay is recorded if a potential entitlement to two pensions has been established.
20	Contracted-out date	Check that this is present and not earlier than 06/04/1978.

FPS 2006 SPECIAL MEMBERS		
	Data item	Comment
21	Retained option election	An indicator should be present to identify that the member elected to purchase benefits under the retained option.
22	Additional special service	A record of additional special pensionable service awarded to the member (excluding any period relating to the conversion of standard to special service).
23	Converted special service	Details of service that was converted from standard to special service.
24	Settlement format	Indication of whether by lump sum or periodic contribution.
25	Settlement amounts (lump sum/ periodic to date)	Details of settlement amounts paid to date.

DEFERRED

	Data item	Comment
1	Scheme at leaving – 1992, 2006 (Standard), 2006 (Special), 2015	Check that membership class is present, if it is required in order to define the class of membership, from which the scheme rules and benefits applicable to the member can be ascertained.
2	Any previous FS scheme membership - 1992, 2006 (Standard), 2006 (Special)	Check whether transitional data exists and that the dates are consistent with the scheme parameters.
3	Former employer	Check that name of former employer is present.
4	Reckonable service	Split as necessary to calculate benefits and reflect aggregated service. Check that total reckonable service is consistent with start/ end date and hours.
5	Qualifying service	Check that a total amount of Q service is recorded and consistent with start/ end date.
6	Transferred-in service	If benefits have been transferred in, check that all relevant details are recorded. This will include (as a minimum) the details of the previous scheme, the amount of the transfer value (split between protected rights and non-protected rights and, if relevant, split between the amount received in respect of member and employer contributions and AVCs), benefits secured, and (if relevant) contracting out details.
7	Purchased service (added 60ths)	Check that full details of any purchased service are present, including amount bought, and total payable, whether by lump sum or periodic contribution.
8	FS pay at date of leaving	Check that final pensionable salary calculated at date of exit is present.
9	Initial deferred pension (FS)	Check that total original deferred benefit is present (either derived or explicit). Split by tranches of accrued pension (e.g. APBs) including separate records of any debit and credits.
10	Current deferred pension (including PI) (FS)	Check that this is present, split by tranches of accrued pension (e.g. APBs) including separate records of any debit and credits. The sum of the individual components must equal any total pension that is recorded on the system.
11	Date payable (FS)	Check that deferred payment date is present and consistent with date of birth.
12	Initial CARE pension	Check that value at date of exit is present, including revaluation to date of exit.
13	Current CARE pension (including PI)	Check that current value is present and includes any relevant PI.

14	Date attains SPA	Should be the date the member reaches state pension age under current legislation, for payment of 2015 deferred benefit.
15	PSOs/ Earmarking	If a member has had a pension sharing or earmarking order, check that full details of the benefits transferred/ to be paid to the ex-spouse/ex-civil partner are recorded.
16	Scheme pays debits	Check that details of any future scheme pays debits are recorded including amount of tax charge and annual pension debit.
17	Contracted-out date	Check that this is present and not earlier than 06/04/1978.
18	Pre/ Post-88 GMP	Check that a member with at least one month of pre 4/88 contracted out service has a pre-88 GMP. GMP must be divisible by 52. May be derived if total GMP and post 4/88 GMP are recorded. Check that a member with at least one month of post 4/88 service contracted out on a GMP basis has a post 88 GMP. Can be derived or explicit.
19	Date GMP revalued to	Check that a revaluation rate is present for each element of GMP.

FPS 2006 SPECIAL MEMBERS		
	Data item	Comment
20	Retained option election	An indicator should be present to identify that the member elected to purchase benefits under the retained option.
21	Settlement format	Indication of whether by lump sum or periodic contribution.

PENSIONER

	Data item	Comment
1	Scheme at leaving – 1992, 2006 (Standard), 2006 (Special), 2015	Check that membership class is present, if it is required in order to define the class of membership, from which the scheme rules and benefits applicable to the member can be ascertained.
2	Any previous FS scheme membership - 1992, 2006 (Standard), 2006 (Special)	Check whether transitional data exists and that the dates are consistent with the scheme parameters.
3	Former employer	Check that name of former employer is present.
4	Marital status	Ensure marital status is recorded to determine correct calculation of dependant benefit.
5	Type of pension (e.g. normal, ill-health, pension credit)	Check that retirement type is present, in order that the benefits applicable to the member can be ascertained.
6	FS pay at date of leaving	Check that final pensionable salary calculated at date of exit is present.
7	Date pension began (FS)	Check that date pension started is present and is after date joined scheme. Systems need to take account of partial retirements.
8	Pre-commutation pension (FS)	Check that a total gross pension is present (either derived or explicit) - initial basic final salary scheme pre-commutation pension.
9	Initial pension (FS)	Check that a total pension is present (either derived or explicit) - basic final salary scheme pension at retirement after commutation. Split by tranches of accrued pension (e.g. APBs) including separate records of any debit and credits.
10	Current pension (including PI) (FS)	Check that this is present, split by tranches of accrued pension (e.g. APBs) including separate records of any debit and credits. The sum of the individual components must equal any total pension that is recorded on the system.
11	Commutation factor	Check that GAD factor used to calculate lump sum is recorded.
12	Commuted lump sum	Check that amount of lump sum paid in lieu of final salary scheme pension is present and consistent with factor/ amount commuted.
13	Injury award	Check details of any injury award in payment at the date of assessment.

14	Date CARE pension began	Check that date pension started is present and is after date joined scheme. Systems need to take account of partial retirements.
15	Pre-commutation CARE pension	Check that a total gross pension is present (either derived or explicit) - initial basic 2015 scheme pre-commutation pension.
16	Initial CARE pension	Check that value at date of exit is present, including revaluation to date of exit.
17	Current CARE pension (including PI)	Check that current value is present and includes any relevant PI.
18	Commuted lump sum	Check that amount of lump sum paid in lieu of CARE scheme pension is present and consistent with factor of 12/ amount commuted.
19	PSOs/ Earmarking	If a member has had a pension sharing or earmarking order, check that full details of the benefits transferred/ to be paid to the ex-spouse/ex-civil partner are recorded.
20	Scheme pays debits	Check that details of any scheme pays debits are recorded including amount of tax charge and annual pension debit.
21	Contracted-out date	Check that this is present and not earlier than 06/04/1978.
22	Pre/ Post-88 GMP	Check that a member with at least one month of pre 4/88 contracted out service has a pre-88 GMP. GMP must be divisible by 52. May be derived if total GMP and post 4/88 GMP are recorded. Check that a member with at least one month of post 4/88 service contracted out on a GMP basis has a post 88 GMP. Can be derived or explicit.
23	Date GMP revalued to	Check that a revaluation rate is present for each element of GMP.
24	LTA charge paid	Check that the date and amount of any lifetime allowance charge paid is present.
25	UP details	Check that full details are recorded if an unauthorised payment has been made. Details will include the nature, date and amount of the payment.

FPS 2006 SPECIAL MEMBERS		
	Data item	Comment
26	Retained option election	An indicator should be present to identify that the member elected to purchase benefits under the retained option.
27	Settlement format	Indication of whether by lump sum or periodic contribution.

DEPENDANT

	Data item	Comment
1	Deceased's scheme at leaving – 1992, 2006 (Standard), 2006 (Special), 2015	Check that membership class is present, if it is required in order to define the class of membership, from which the scheme rules and benefits applicable to the member can be ascertained.
2	Deceased's former employer	Check that name of former employer is present.
3	Deceased's NI number	'TN' formats should be regarded as missing data. The final character of NI numbers is not essential.
4	Dependant type	Check that dependant type is present, in order that the benefits applicable can be ascertained.
5	FS derived pension	Check that a value is recorded for dependant's final salary scheme pension, excluding any injury pension payable.
6	CARE derived pension	Check that a value is recorded for dependant's CARE scheme Pension at valuation date, excluding any injury pension payable.
7	Injury award	Check details of any dependant's injury award (DIS only).
8	Partner's Pre/ Post-88 GMP	Check that a member with at least one month of pre 4/88 contracted out service has a pre-88 GMP. GMP must be divisible by 52. May be derived if total GMP and post 4/88 GMP are recorded. Check that a member with at least one month of post 4/88 service contracted out on a GMP basis has a post 88 GMP. Can be derived or explicit.
9	Date GMP revalued to	Check that a revaluation rate is present for each element of GMP.

Accuracy

In order to calculate your data score, data has to be both present and accurate. Your score will be the percentage of scheme members you assess to meet these criteria for all data items, measured in each category. Testing for the presence of data is relatively straightforward, however testing for accuracy is subjective and will require some measure of judgment.

TPR guidance suggests that accuracy may be measured by the presence of sufficient processes and controls to ensure the quality of new and historical data. The below paragraphs provide some guidance on the types of processes you might expect to have in place for Fire data and provides some illustrative examples of areas that you might want to examine more fully.

- Checking you have data in all the fields you expect.

In order to test for presence and accuracy you will need to establish entitlement, for example the absence of an Additional Pension Benefit (APB) is not necessarily inaccurate for a member who is not in receipt of CPD payments or a temporary promotion.

Likewise you will need to consider the two pension rule. An administrator may not be aware entitlement exists unless they have been specifically told by the employer that a member may be entitled to a two pension award due to a drop in pay, so you may first need to consider the employer process with regards to acknowledging entitlement to benefits and informing the administrator.

You will also need to consider any data that is not held on the software, for example we are aware that some Fire Authorities / pension administrators have established manual processes to administer special members of the 2006 scheme, and the data does not necessarily sit on the administration software. You would need to consider where this data is held and what processes are in place to ensure the data is present and accurate.

Therefore you will need to consider what processes are in place to order to ascertain that where a member has entitlement to a benefit and that the information needed to calculate that benefit is present

- Consistency checks – data items must be consistent with each other, for example the date a member joined the scheme must be later than their date of birth, and prior to their expected retirement date.

You may wish to consider the processes for consistency checks for pay, for example many administrators may establish a tolerance check that checks for pay increases or decreases within a certain percentage.

- Validation checks – data items should be in a valid format, for example the two letter prefix of the national insurance number needs to match the two letter prefixes used by HMRC.

To test for accuracy you may also want to consider the frequency of validation checks, for example, administrators who have established automated monthly data reconciliation processes will have more opportunity to frequently validate the data.

You may also want to use the amount of errors returned to the employer to consider the likelihood of accuracy. For example an administrator with multiple clients may experience a higher error return rate for some clients than others.

- Specific processes, for example regular existence checks, or checking members' dates of birth, e.g. against birth certificates, at the point benefits are taken.

Your administrator should regularly report to you on the outcome of their quality controls. If any key data item is identified as absent or likely to be incorrect, it should be verified with the relevant member or employer.

This factsheet has been prepared by LGA to give some informal guidance on completion of the annual TPR scheme return for the Firefighters' Pension Scheme. It is not intended as advice or a definitive 'how to' guide.

The following sources are acknowledged in the development of this factsheet: TPR, GAD, Aquila Heywood, LGPC.

Please address any queries on the content of this factsheet to
bluelight.pensions@local.gov.uk