Pensions Audit Sub Committee

2.00pm, Tuesday, 6 December 2022

Data Quality Update

1. Recommendations

The Pensions Audit Sub Committee is requested to:

1.1 note the report and highlight any points it would like to raise at the Pensions Committee on 7 December 2022

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Data Quality Update

2. Executive Summary

2.1 The purpose of this report is to inform the Pensions Audit Sub-Committee of the ongoing work to enhance the quality of the pension administration membership record data.

2.2 In accordance with its Pension Administration Strategy, the Fund continues in its efforts to improve the flow of data from employers through regular reporting and liaison.

2.3 This year the Fund has focused on cleansing member records for the annual benefit statement production and The Pensions Regulator scheme return. The Fund has also been preparing for the McCloud remedy and the Pensions Dashboards Programme.

3. Background

3.1 In previous years, Pensions Audit Sub-Committee noted the continuing work to ensure the good quality of pension administration membership record data.

3.2 The information demands of accurate record- keeping increased with the introduction of a scheme based on career average revalued earnings (CARE) in 2015. The Pensions Regulator expects that an administering authority should:

3.2.1 set out responsibilities to scheme employers clearly;

3.2.2 escalate any non-compliance to senior management (of the employers);

3.2.3 utilise the ability to impose (recovery of cost) charges; and

3.2.4 report individual scheme employers where their failure has caused a statutory breach.

3.3 The Fund procured a new analytical tool from the software supplier which is a more powerful data interrogation and visualisation tool than the existing reporting method. The tool is delivered with a number of standard dashboards and reports including the score measurement required by TPR based on a comprehensive analysis and on the percentage of clean member records without a single data failure.

3.4 The Fund sets out standards for provision of data from employers in an agreed Pensions Administration Strategy (**PAS**). It includes scope for the Fund to levy charges to cover any resultant costs if an employer's performance continues to fall below acceptable tolerances. This provision ensures that the administrative costs of

the Fund are borne equitably by all the employers. Criteria for passing on costs of poor performance by employers consist of any of the following;

3.4.1 Contributions received later than the regulatory standard;

3.4.2 Not regularly addressing membership data queries;

3.4.3 Consistently failing to meet service standard for new starts, leavers, retirements and deaths, and no clear commitment to improve; and

3.4.4 not submitting monthly contributions for each member via the secure portal.

3.5 Lothian Pension Fund utilises 2 employer portals. The first portal ("i-Connect") for the secure submission of monthly member updates and the second ("GoAnywhere") for secure document sharing. The Fund continues to collaborate with the supplier to integrate a document sharing facility with in the first portal. The first phase has been delivered to i-Connect allowing employers to submit forms which automatically creates a task and appends the document to the member's pension record. Since inception in January 2022 4,247 documents have been uploaded to member records using this facility.

4. Main Report

Pension Administration Strategy (PAS) performance 2021/22, to date

4.1 Fund-wide performance against PAS standards is reported each year in the Annual Report. Annual reports are issued to each employer outlining their own performance and comparing this to other employers of a similar size. Quarterly reports are also issued to the four Councils and on an exception basis to any employer whose performance merits specific intervention.

4.2 Overall employer performance for the first half of 2022/23 is shown below, with the full year of 2021/22 shown for comparison purposes

Employer performance		Quarter 2 2022/23			2021/22		
Case type	Target (working days)	Number received	Number within target	% within target	Number received	Number within target	% within target
New Starters	20	4150	3830	**92%**	6099	5335	**87%**
Leavers	20	2319	1310	**56%**	2618	1459	**56%**
Retirements	20	735	242	**32%**	1422	544	**38%**
Deaths In Service	10	11	3	**27%**	32	20	**63%**

4.3   The following graph shows the number of employers falling into percentile groupings for each case type for the first half of 2022/23 and the number of member records they represent.

Percentile	New Starters	Leavers	Retirements	Deaths In Service
90% - 100%	33 (2421 records)	8 (48 records)	4 (6 records)	2 (3 records)
70% - 89%	3 (1729 records)	11 (763 records)	1 (6 records)	nil
less than 70%	nil	22 (1508 records)	19 (723 records)	4 (8 records)

4.4   The City of Edinburgh Council's performance, except for New Starters, continues to be poor, scoring in the bottom percentile group for three categories. Midlothian Council has the best overall performance of the four Councils and East and West Councils have shown improvement in their Leaver statistics. All Councils were in the bottom percentile group for Retirements.

4.5   As previously advised to Pensions Committee, the PAS was reviewed to add an additional instance where employers may be charged for poor performance. Specifically, where an employer fails to achieve a performance level of 75% in target for the provision of early leaver and retirement information, an additional charge may be levied on an annual basis at the Fund's discretion. The Fund recognised that performance for The City of Edinburgh Council had been influenced by mitigating circumstances and noted some improvement with East and West Councils. To date no charges for poor performance have been levied as the Fund considered this to be punitive and detrimental to the ongoing collaborative relationship.

4.6   Fund officers have continued to meet with employers, particularly new contacts, to ensure that the requirements set out in the PAS are understood. Training sessions with payroll and HR staff have also been held.   Although information on performance is discussed with regular contacts, it is recognised that in some cases, where employer performance continues to be poor, escalation processes set out in Section 8.2 of the PAS will be followed. As in previous years, senior officers from the Fund will be holding annual meetings with large employers and these meetings will include discussion of the performance to highlight the key areas where improvement is required.

Monthly Contribution (Data) Return - Submissions

4.7 During 2021/22 an average of 95.4% of monthly submissions were provided through the employer portal by the PAS target of 19th of following month. This was an increase of 1.9% from 2020/21. The average for the first half of 2022/23 is 98.0%.

4.8 It was previously reported that the Fund was still having to devote a significant monthly resource to work with The City of Edinburgh Council to manually correct submitted data. There has been a change of resource at The City of Edinburgh Council which has reduced although not eliminated this resource. The Fund continues working with the Council to reduce this further.

Annual Benefit Statement 2022 – data returns from employers

4.9 The PAS stipulates that failure by an employer to provide the Fund with a year-end return by 19th April each year shall incur a £200 initial fee plus 5p per active member per working day from 20th April to date return is received. By the deadline 98.5% of employers, all but one, had submitted year-end financial data. The City of Edinburgh Council experienced an issue which meant their submission was made the following day on the 20th April.

4.10 Although this year the target of 100% was not met the Fund will not levy a cost recovery charge on any employer for late submission of the year-end return. The Fund was satisfied that this was concluded by 20 April 2022.

4.11 During the pre-production data cleanse for annual benefit statement 625 data issues were resolved with 306 requiring to be queried with the employers, 0.85% of active membership. Previously it was reported that The City of Edinburgh Council had 123 outstanding queries from the previous year which have since been resolved.

4.12 54,691 annual benefit statements (100% of member records) were produced and published to the member online service by the statutory deadline of 31 August 2022, of which 20,114 were for deferred members. For 1,207 deferred members the Fund did not hold a current address and had been unable to send newsletters to these members. 4.13 details the Funds ongoing effort to trace these members. The Fund, for the first time sent communication by email to 31,507 active and deferred members. The Fund was able to record that the email open rate was 48%, which is above all industries standards. The fund was also able to record that in the last 6 months 14,380 active and deferred members records were accessed online.

Other data quality initiatives, including mortality screening and tracing

4.13 To prevent fraud and overpayments of pensions, the Fund takes part in the National Fraud Initiative. The 2022/23 exercise is due to commence, and data will be extracted for analysis shortly. The Fund utilises the "Tell Us Once" central and local government death notification service and procured services to trace "lost" members and to provide mortality validation.

4.14   The Fund continues to carry out regular mortality and tracing on deferred and pensioner members using several external sources. 511 suspended pensions have been resolved since November 2021. The Fund also introduced the use of biometric authentication for proof of life for overseas pensioners. The Fund conducted a bulk tracing of "lost" members as well as utilising an online service to investigate by individual case level throughout the year. In September 2022 the number of records with a "gone away" address was 1,985 down by 137 from the previous year.

4.15   The Fund annually participates in "Club Vita" a specialist company proving longevity monitoring and experience analyses, for various data quality assurance checks. Data extract for 2022 analysis was submitted in September and results are awaited. The latest available annual report from December 2021 showed that our data quality continued to compare favourably with other funds. Confidentiality constraints do not permit more detailed disclosure. The Fund utilised the previous reports to undertake data cleansing for 2022 extract.

Management information and data quality monitoring

4.16   The Pensions Regulator (TPR) requires measurement of the presence of member data items important to the administration of a pension scheme. This has been split into two sets, "common data" which is applicable to all schemes and "conditional data" which is dependent on the specific scheme type and design.

4.17   The Fund utilised an analytical tool to carry out member record rectification work prior to taking the final position for the TPR 2022 annual scheme return. The member data extract was run on 23 September 2022, with effective date as of 31 March 2022. This means that the data cleansing of member records undertaken by the Fund prior to the issuing of Annual Benefit Statements is reflected in the assessment. This timeframe also aligns to the submission of the annual scheme return to TPR by 30 November.

LPF TPR Scores

SHPF TPR Scores
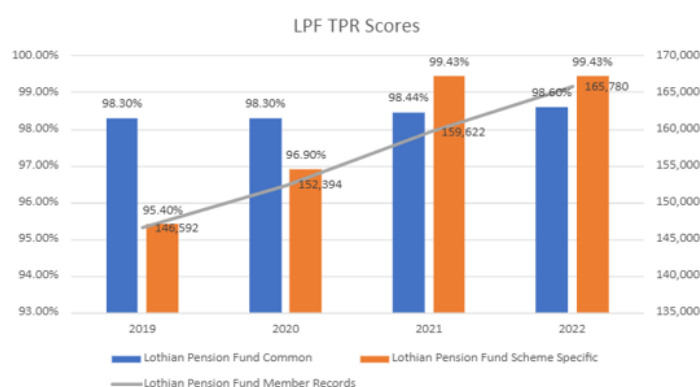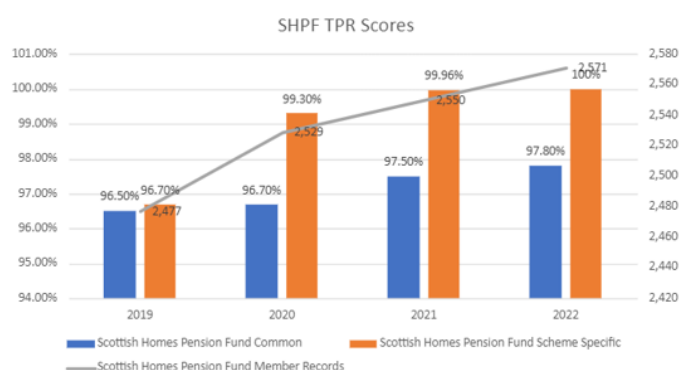
4.18 Data Quality Reports are provided in full at Appendices 1-3

4.19 Rectification work to address the data issues identified by the reports is being progressed. Appendix 3 provides the Funds Data Quality Improvement Plan as required by The Pensions Regulator.

5. Financial impact

5.1 There are no direct financial implications arising from this report.

5.2 Data quality is fundamental to the effective and efficient administration by the Fund. Costs are met by the Fund's administration budgets (staff and third-party payments).

6. Stakeholder/Regulatory Impact

6.1 The Pension Board, comprising employer and member representatives, is integral to the governance of the fund and they are invited to comment on the relevant matters at Committee meetings.

6.2 There are no adverse health and safety, governance, compliance or regulatory implications as a result of this report. The forward planning of the Committees' agendas should facilitate improved risk management and governance for the pension funds.

6.3 There are no adverse sustainability impacts arising from this report.

7. Background reading/external references

7.1 None

8.   Appendices

Appendix 1 – Scottish Homes Pension Fund – Data Quality Report 2022

Appendix 2 – Lothian Pension Fund – Data Quality Report 2022

Appendix 3 – Data Quality Improvement Plan 2022

Local Government Pension Scheme

Data Quality Report

Scottish Homes Pension Fund

Data Quality Report

Diane Sinclair

Pensions Employer and Member Manager

Lothian Pension Fund

Version October 2022

Contents

1. Summary

1.1 Introduction

The Pensions Regulator (TPR) is the UK regulator of work-based pensions schemes. It works with trustees, employers, pension specialists and business advisors giving guidance on what is expected of them when running, overseeing or advising a public service pension scheme. To manage a scheme properly the scheme needs to make sure it has accurate, complete and up-to -date records as failure to do so means the scheme is at risk of not meeting their legal obligations.

Scottish Homes Pension Fund (the Fund), in the role of scheme administrator, is expected to regularly review the quality of the scheme data but must do so at least once a year. TPR have created data quality measures for common and scheme-specific data and scores are based on data being present and accurate. These data scores are submitted in each scheme return to TPR.

1.2 Data Quality Analysis Tool

Since 2018 the Fund have employed Heywood's data quality service to test and analyse the data to satisfy TPR measures. This was carried out once a year using a cut of the Funds August data. Heywood would supply the overall scores and data quality reports. In April 2021 the Fund procured Heywood's new analytical tool "Insights" which uses tableau business intelligence software. The data quality tests and dashboards are included in the tool. This has given the Fund greater control as it allows access to results daily, giving comfort that the rectification work being undertaken is correct.

1.3 Benchmark

TPR requires schemes to have effective processes for maintaining data and continually improve the quality of the data held.

2. TPR Test Results

2.1 TPR Common Data Test Results

The percentage of member records that did not fail any of the tests deemed to be in the core list of TPR tests is **97.8%.** This is the figure that will be quoted on the scheme return to TPR.

Data Quality | Summary

97.8%

TPR Pass Rate %

2.2 TPR Scheme-specific Data Test Results

The percentage of member records that did not fail any of the tests deemed to be in the core list of TPR tests is **100%**. This is the figure that will be quoted on the scheme return to TPR.

LGPS Scheme Specific Data Quality | Overall Summary

100.00%

TPR Pass Rate %

2.3 Historical Results

The common data score increased by 0.3% from last year's return whilst the scheme specific score increased by 0.04%. This is the first time a 100% was quoted in the scheme return to TPR.

SHPF TPR Scores
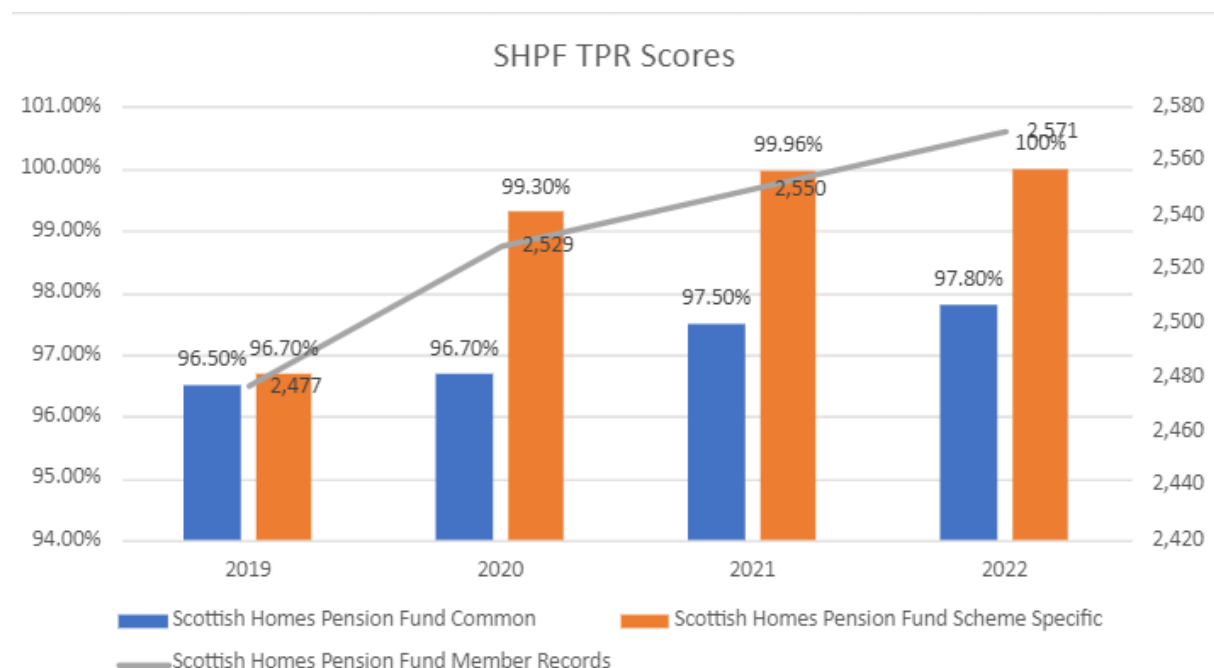
3. Analysis of Data Results

3.1 Membership Records in Scope

The 2022 tests were conducted on 2,571 member records an increase of 21 from 2022. Not all member records are required to be tested under each data category. Appendices A and B detail the test conditions and exclusions.

Last year's report stated that "tests had been conducted on 2,520 records a decrease of 9 on 2020". This was incorrect and should have read "tests had been conducted on 2,550 records an increase of 21 on 2020".

3.2 Summary of Common Data Results

The graph below indicates the Fund's performance for each data category extracted on 23rd September 2022.

TPR Pass Rate % by Test Category

Category	Pass Rate
Ni Number (TPR)	99.96%
Name (TPR)	100.00%
Sex / DOB (TPR)	100.00%
Date Commenced (TPR)	100.00%
Status (TPR)	100.00%
Invalid Data View (TPR)	100.00%
Address (TPR)	95.95%
Valid Data View (TPR)	100.00%

The score for the Address category is the only category not to achieve 99% or above. The following table shows the breakdown of the number of records that failed this category's tests.

Fail A: Address record does not exist	0
Fail B: Address record exists, but line 1 (ADD-LINE-1) is blank	0
Fail C: Gone Away (ADD-GONAWY) indicator is set	55
Fail D: Postcode is blank and address is not overseas	1
Fail E: Postcode format invalid and address is not overseas	0

55 member records are recorded as "gone away". Details of the Fund's proposals to improve this test score is outlined in the Data Correction Plan.

3.3 Summary of Scheme-specific Data Results

The graph below indicates the Fund's performance for each data category extracted on 23rd September 2022.

Grand Total | TPR Pass Rate % by Test Category

Category	Pass Rate
Member Details	100.00%
Member Benefits	100.00%
CARE	100.00%
HMRC	100.00%
Contracting Out	100.00%

The following tables shows the percentage of members without a failure for the previous categories' tests.

Category	Test	Percentage
Member Details	Date of Leaving	100.00%
	Leavers	100.00%
	Date Joined Scheme	100.00%
	Employer Details	100.00%
	Remuneration FS	100.00%
	Contributions	100.00%
	Service	100.00%
Member Benefits	Divorce Details	100.00%
	Transfer In 1	100.00%
	Transfer In 2	100.00%
	AVC Details	100.00%
	Total Deferred	100.00%
	Deferred Tranches	100.00%
	Total Pension	100.00%
	Pension Tranches	100.00%
	Total Dependant	100.00%
	Dep. Tranches	100.00%
CARE	CARE Data	100.00%

Category	Test	Percentage
HMRC	BCE2	100.00%
	BCE5	100.00%
	BCE6	100.00%
	BCE7	100.00%
	BCE8	
	LTA Charge	100.00%
	AA Charge	

No Scottish Homes Pension Fund membership fell into scope for the BCE8 and AA Charge test criteria.

Contracting Out		
Dt. Contracted Out		100.00%
NI History		100.00%
Pre 88 GMP		100.00%
Post 88 GMP		100.00%

Appendix A – Common Data Test Conditions and Exclusions

Category	Fail Condition	Test Condition	Members Excluded from Test	Included in TPR Tests?	Additional TPR Exclusions / Notes
Address	Fail A	Address record does not exist	Leavers (Status 3) and Deaths (Status 7)	Yes	None
	Fail B	Address record exists, but line 1 (ADD-LINE-1) is blank	Leavers (Status 3) and Deaths (Status 7)	Yes	None
	Fail C	Gone Away (ADD-GONAWY) indicator is set	Leavers (Status 3) and Deaths (Status 7)	Yes	None
	Fail D	If the address is not overseas, the Postcode (POSTCODE) is blank	Leavers (Status 3) and Deaths (Status 7)	Yes	None
	Fail E	If the address is not overseas, the Postcode is not the correct format (1st letter =Q, V or X, 2nd letter is I, J or Z, 3rd, 4th or 5th character is not a space)	Leavers (Status 3) and Deaths (Status 7)	No	N/A
Date Commenced and NRD	Fail A	Date Joined fund (DJF / DJS) is blank	Status 6 or Status O or previous status 6	Yes	None
	Fail B	Date Joined Fund is earlier than Date of Birth plus 15 years	Status 6 or Status O or previous status 6	No	N/A
Name	Fail A	Surname (SURNAME) is blank	None	Yes	None
	Fail B	Forenames (FORENAMES) is blank	None	Yes	None
	Fail C	Initials (INITS) is blank	None	No	N/A

Name	Fail A	Surname (SURNAME) is blank	None	Yes	None
	Fail B	Forenames (FORENAMES) is blank	None	Yes	None
	Fail C	Initials (INITS) is blank	None	No	N/A
NI Number	Fail A	NI Number (NI-NUMBER) is blank	None	Yes	None
	Fail B	NI number is temporary (commences TN)	Child pension members (DEPND-TYPE = 'C'),	Yes	Current status 3 (no liability) and 7 (death) members excluded
	Fail C	NI number does not adhere to standard (Neither of the first two letters can be D, F, I, Q, U or V. The second letter cannot be O. Prefixes BG, GB, KN, NK, NT, TN (checked in fail B) and ZZ are not used. Suffix must be A, B, C or D. Characters 3-8 must be numbers)	None	No	N/A
Sex and Date of Birth	Fail A	Sex (SEX) is blank	None	Yes	None
	Fail B	Sex is not Male or Female	None	Yes	None
	Fail C	Date of Birth (DOB) is blank	None	Yes	None
	Fail D	Date of Birth is earlier than or equal to 01/01/1900	Leavers (Status 3) and Deaths (Status 7)	Yes	None
Status	Fail A	Status (STATUSKEYF) is blank	None	Yes	None
	Fail B	Status is not 1-9, T or O	None	Yes	None
	Fail C	Status on member summary (STATUSKEYF) does not match that on basic details (STATUS[1])	None	No	N/A

Status and Invalid Data View	Fail A	Exit details should not be present unless status is 3, 7 or 9 or a previous status is 9 and the current status is 1, 2, 4, 5 or T	As per Test Condition	No	N/A
	Fail B	Deferred details should not be present unless status is 4 or a previous status is 4 and the current status is 1, 2, 3, 5, 7 or T	As per Test Condition	No	N/A
	Fail C	Pension details should not be present unless status is 5 or T or a previous status is 5 or T and the current status is 1, 2, 3, 4 or 7	As per Test Condition	No	N/A
	Fail D	Dependant details should not be present unless status 6 or a previous status is 6 and the current status is 3 or 7	As per Test Condition	No	N/A
Status and Valid Data View	Fail A	Deferreds who do not have deferred details data view	All but status 4	No	N/A
	Fail B	Pensioners who do not have pension details data view	All but status 5 and T	No	N/A
	Fail C	Dependant Pensioners who do not have dependant details data view	All but status 6	No	N/A
	Fail D	Leavers from active or deferred who do not have exit details data view	All but status 7 or 9, with a previous status of 1,2 or 4	No	N/A
	Fail E	Death from pensioner status does not have a relevant date pension ceased	All but Status 7 with a previous status of 5 or T	No	N/A
	Fail F	Death from dependant pensioner status does not have a relevant date pension ceased	All but Status 7 with a previous status of 6	No	N/A

Appendix B – Scheme-specific Data Test Conditions and Exclusions

Category	Sub Category	Sub Category Eligibility	Fail Condition	Test Condition	Members Excluded from Test	Included in TPR Tests?	Additional TPR Exclusions / Notes
CARE	CARE Data	Current status is 1 or status is 2/4/5/9/A with date left is after the end of Final Salary, with a date joined fund prior to current CARE year start. (Day after last posting date). Member is not a pension credit member (CLASS = 'PC') or a England /Wales site councillor member (CLASS = 'CM')	Fail A	CARE service member has no main CARE tranche (CARE-BNCDE = 'LGPSMAIN' or 'LGPSS050')	member employments with no service (DJF to DATE-LEFT/today or service history line spanning the period) between end of final salary and the last scheme posting date	No	N/A
			Fail B	Member has a valid CARE list entry (for a valid tranche code) ending on each 31March between Date Joined (or Care revaluation start or last rehire date (where status 4/9 exists with subsequent status 1) if later) and the current posting date (or date left if sooner)	members whose date left (DATE-LEFT) was prior to the first CARE revaluation date, or date joined (DJF) was after the last scheme posting date.	Yes	None
			Fail C	For each contribution entry during CARE accrual dated 31/03/yyyy (within the Fail B period above) with an amount over zero, there is a corresponding 31/03/yyyy period ending entry on the CARE benefit list for a valid tranche code with a salary amount over zero.	N/A	No	N/A
Contracting Out	Date Contracted Out	Current Status is 1,2,4,5 or T, Member is not a pension credit member (employment type 'PC' excluded), and member does not have a reduced NI indicator (RED-NI) of X,Y or N	Fail A	Date contracted out SSPA75 is invalid or blank and DJF is prior to 6/4/16	DJF after 05/04/2016	Yes	None
			Fail B	Date contracted out SSPA75 is valid (not blank or on or before 01/01/1900) and prior to 06/04/1978	N/A	Yes	None
			Fail C	Date contracted out SSPA75 is later than 05/04/2016	N/A	Yes	None
	NI Contributions/ Earnings History	Current Status is 4 or 5, with date contracted out between 6/4/78 and 5/4/97. Member is not a pension credit member (employment type 'PC' excluded), and member does not have a reduced NI indicator (RED-NI) of X,Y or N, and NI Table (NI-TABLE) code is not 'E'	Fail A	A Status 4 member is missing Date Left Active Service (DATE-LEFT) or a Status 5 member is missing both Date Left Active Service and Date of Retirement (STATUS-DATE[1])	Null	Yes	None
			Fail B	For one or more period end NI posting, the amount is missing or zero	N/A	No	N/A
			Fail C	There is not a separate NI Contribution entry for each April 5th between Date Contracted Out and 5/4/97 (or 5/4 after Date Ret if earlier)	N/A	No	N/A
			Fail D	GMP is not present on the NI details for status 1 and 2 and on GMP details for status 4, 5 & T	Null	No	N/A

			Fail E	Both Fail C and Fail D occurred	Null	Yes	None
	Post 88 GMP	Current Status is 4,5 or T, Date of leaving (DATE-LEFT) post 05/04/1988 and date of contracting out is prior to 06/04/1997, Member is not a pension credit member (employment type 'PC' excluded), and member does not have a reduced NI indicator (RED-NI) of X,Y or N	Fail A	Total GMP (GMP-T-DOL) at exit is missing or zero	Null	Yes	None
			Fail B	Post 88 GMP (GMP-T-ADOL) at exit is missing or zero	Null	Yes	None
			Fail C	Post 88 GMP at Exit (GMP-T-ADOL) is not divisible by 52	Null	Yes	None
	Pre 88 GMP	Current Status is 4,5 or T, Date of leaving (DATE-LEFT) post 06/04/1978 and date of contracting out is prior to 06/04/1988, Member is not a pension credit member (employment type 'PC' excluded), and member does not have a reduced NI indicator (RED-NI) of X,Y or N	Fail A	Total GMP (GMP-T-DOL) at exit is missing or zero	Null	Yes	None
			Fail B	Total GMP at exit (GMP-T-DOL) less post 88 GMP at exit (GMP-T-ADOL) is negative	Null	Yes	None
			Fail C	Total GMP at exit (GMP-T-DOL) less post 88 GMP at exit (GMP-T-ADOL) is not divisible by 52	Null	Yes	None
HMRC	AA Charge	Current Status is 1	Fail A	Employments' latest annual allowance PIP end date (AAL-PIPEND) is prior to the latest expected PIP end date	Employments that have a status 4 or 9 with date left prior to the last expected PIP end date, and a subsequent status 1 date after the expected PIP end date	Yes	None
			Fail B	Employment has a annual allowance entry where either the scheme pays indicator (AAL-SCHPAY) is set but the scheme pays debit amount (AAL-SPCSH1) is not greater than zero, or vice versa	N/A	No	N/A
	BCE2	Current status is 5 or T with status date after 05/04/2006	Fail A	Latest crystallisation date (CRYS-CRSYSD) entry is missing, is not a valid date or is earlier than date left	N/A	Yes	None

Code	Description	Fail	Fail Description			
		Fail B	PLA amount (CRYS-PLA) is blank or zero	N/A	Yes	None
		Fail C	PLA % (CRYS-PLAPC) is blank or zero	N/A	No	N/A
BCE5	Current status is 4 or T	Fail A	Member is aged over 75	N/A	No	N/A
BCE6	Current status is 5 or T with status date after 05/04/2006, and aged under 75 at the status date	Fail A	Latest crystallisation date (CRYS-CRSYSD) entry is missing, is not a valid date or is earlier than date left	N/A	No	N/A
		Fail B	Member has retirement grant (PEN-TOT-AL > 0) but PCLS (CRYS-PCLS) is blank	Retirement Grant (PEN-TOT-AL) blank or zero	Yes	None
		Fail C	There is a serious ill health crystallisation date (CRYS-ILLD) but no amount (CRYS-ILLA), or vice versa	N/A	No	N/A
BCE7	Current Status is 7, and current status date is post 05/04/2006 and within 5 years of status 5 date entry	Fail A	Death grant (CDTC-TOTLS) is blank or zero	N/A	No	N/A
		Fail B	Death grant (CDTC-TOTLS) is greater than zero, but the crystallisation amount (CDTC-CVAL) or percent (CDTC-CVALP) is blank or zero	Death grant (CDTC-TOTLS) greater than 0	No	N/A
BCE8	Current status is 3 and date left (DATE-LEFT) is after 05/04/2006, and have a overseas transfer date present (CRYS-TFRD)	Fail A	overseas transfer date present (CRYS-TFRD) is blank or invalid, or earlier than date left	N/A	No	N/A
		Fail B	QROPS transfer amount (CRYS-TFRA) is blank or zero	N/A	No	N/A
		Fail C	DOB is not a valid date	N/A	No	N/A

		Condition		Test Condition	Members Excluded from Test	WW Tester	Exclusions/Notes
			Fail D	Age at transfer dates (CRYS-TFRD) is 75 or greater	N/A	No	N/A
	LTA Charge	Current status is 5 or T with status date after 05/04/2006, and doesn't have either all enhanced protection or PCLS payment BCE data fields completed (i.e. both CRYS-BCEVD/ CRYS-BCEVA/ CRYS-BCEVI and CRYS-PPD / CRYS-PPA / CRYS-PPI are not all present)	Fail A	the total PLA used percentage (CRYS-TPPC) is greater than 100, but no LTA charge amount is completed (CRYS-LTACH and CRYS-LTA25 and CRYS-LTA55 are all blank or zero)	Total PLA used percentage (CRYS-TPPC) is less than or equal to 100	Yes	None
Member Benefits	AVC Details	Current Status is 1,2,4,5 or T with a AVC Details record present	Fail A	Contract start date (AVC-START) is blank or invalid (incl. on or before 01/01/1900)	N/A	Yes	Non current status 1,2 or 4
			Fail B	Contract end date (AVC-TE-DUE) is blank, invalid (incl. on or before 01/01/1900) or prior to the start date (AVC-START)	N/A	No	N/A
			Fail C	If the contract type (AVC-TYPE) is an added years type ("A", "B", "G", "L", "P", "R" or "S") but the added years amount (AVC-ADDY) is blank or zero	N/A	Yes	Non current status 1,2 or 4
			Fail D	If the contract type (AVC-TYPE) is an added pension ('H' or 'M') but the bought pension amount (AVC-P75T) is blank or zero, or greater than or equal to the scheme maximum	N/A	Yes	Non current status 1,2 or 4
	Divorce	Current Status is 1,2,4,5 or T with a Pension Sharing Record present	Fail A	Initial pension value (DVC-TOTINI) is missing	N/A	Yes	None
			Fail B	Calculation date (DVC-CALDTE) blank or before 01/12/2000	N/A	Yes	None
			Fail C	Payment date (DVC-PAYDTE) blank or before 01/12/2000	N/A	Yes	None
			Fail D	Pension credit amount (DVC-TVAMT) is missing or zero	N/A	Yes	None
			Fail E	Pension debit amount (DVC-CONAMT) is missing or zero	N/A	Yes	None

			Fail F	Percentage split (DVC-PCSPLT) is missing or zero or over 100.00	N/A	Yes	None
	Total Gross Dependant Pension	Current Status is 6	Fail A	Total initial pension value (DEP-TOT-IP) is missing or zero	N/A	Yes	None
			Fail B	Total initial pension value (DEP-TOT-IP) is present, but less than a nominal amount	N/A	No	N/A
			Fail C	Total current pension value (DEP-TOT-CP) is missing or zero	N/A	Yes	None
			Fail D	Total current pension value (DEP-TOT-CP) is present, but less than a nominal amount	N/A	No	N/A
			Fail E	Date for PI calculation (DEP-INC-DT) must be present	N/A	Yes	None
	Total Gross Pension	Current Status is 5 or T	Fail A	Total initial pension value (PEN-TOT-IP) is missing or zero	N/A	Yes	None
			Fail B	Total initial pension value (PEN-TOT-IP) is present, but less than a nominal amount	N/A	No	N/A
			Fail C	Total current pension value (PEN-TOT-CP) is missing or zero	N/A	Yes	None
			Fail D	Total current pension value (PEN-TOT-CP) is present, but less than a nominal amount	N/A	No	N/A
			Fail E	Date for PI calculation must be present and later than date joined fund (DJF)	N/A	Yes	None

Total Original Deferred Benefit	Current Status is 4	Fail A	Total initial pension value (DEF-TOT-IP) is missing or zero	N/A		Yes	None
		Fail B	Total initial pension value (DEF-TOT-IP) is present, but less than a nominal amount	N/A		No	N/A
		Fail C	Total current pension value (DEF-TOT-CP) is missing or zero	N/A		Yes	None
		Fail D	Total current pension value (DEF-TOT-CP) is present, but less than a nominal amount	N/A		No	N/A
		Fail E	PI Calculation date (DEF-INC-DT) is missing or invalid, or prior to date joined fund (DJF)	N/A		Yes	None
		Fail F	First entry of PI calculated date (DEF-PI-DT(1)) is missing is prior to the scheme's last PI date	employments with a date left following the scheme's last PI date		No	N/A
Tranches of Dependant Pension	Current Status is 6	Fail A	PEN pension type (DEP-TYPE) has a value (DEP-I-PEN) less than or equal to a nominal amount	N/A		Yes	None
		Fail B	Latest PI calculated date (PEN-PI-DT) is missing is prior to the scheme's last PI date	N/A		No	N/A
Tranches of Original Deferred Benefit	Current Status is 4	Fail A	A 'PEN' pension type (DEF-TYPE) does not exist or has an initial value less than a nominal amount.	N/A		Yes	None
		Fail B	Initial Pension (DEF-I-PEN) components for (DEF-TYPE) PEN + UPEN + TAPE does not equal total initial pension (DEF-TOT-IP)	N/A		No	N/A

		Fail C	an employment with service between accrual rate change and end of final salary with a missing or less than a nominal value (DEF-I-PEN) PN60 (DEF-TYPE) pension component.	Councillor members(CLASS = 'CM') (in England/Wales sites only) or Pension Credit (CLASS = 'PC'). Members whose service dates (either from DJF to DATE-LEFT) or on service history (with SERV-TYPE = 'L') do not span the period from accrual change to end of final salary (01/04/2008 to 31/03/2014 in England and Wales)	Yes	None
		Fail D	Member with post FS End service has no 'CARE' (DEF-TYPE) tranche or has one with a value (DEF-I-PEN) less than or equal to a nominal figure	Councillor members(CLASS = 'CM') (in England/Wales sites only) or Pension Credit (CLASS = 'PC'). Members whose date of leaving (DATE-LEFT) is pre final salary end date.	Yes	None
		Fail E	Member with 50/50 CARE tranche (CARE-BNCDE = 'LGPS5050' Or 'TVINLG50') has no corresponding pension component (DEF-TYPE = 'CP50') or one with a value (DEF-I-PEN) less than or equal to a nominal figure	N/A	No	N/A
		Fail F	Member with pre FS accrual change service has no 'RA' (DEF-TYPE) tranche or has one with a value (DEF-I-PEN) less than or equal to a nominal amount	Pension Credit (CLASS = 'PC') or members whose date of joining (DJF) and any service history line that starts (HIST-START) after the FS accrual rate change date	No	N/A
Tranches of Pension	Current Status is 5 or T	Fail A	PEN pension type (PEN-TYPE) has an initial value less than a nominal amount.	N/A	No	N/A
		Fail B	Member with service between 01/04/2008 (09 S&NI) and 31/03/2014 (15 S&NI) has no 'PN60' tranche or has one with a value less than a small figure	Councillor members(CLASS = 'CM') (in England/Wales sites only) or Pension Credit (CLASS = 'PC'). Or Members whose service history periods (with SERV-TYPE = 'L') do not span the period from accrual change to end of final salary (01/04/2008 to 31/03/2014 in England and Wales)	Yes	None
		Fail C	Member with post FS end service has no 'CARE' (PEN-TYPE) tranche or has one with a value (PEN-I-PEN) less than or equal to a nominal figure	Councillor members(CLASS = 'CM') (in England/Wales sites only) or Pension Credit (CLASS = 'PC'). Or members whose date of leaving (DATE-LEFT) is pre final salary end date.	Yes	None
		Fail D	Member with 50/50 CARE tranche (CARE-BNCDE = 'CARE5050' Or 'TVIN5050') has no corresponding pension component (PEN-TYPE = 'CP50') or one with a value (PEN-I-PEN) less than or equal to a nominal figure	N/A	Yes	None
		Fail E	First entry of PI calculated date (PEN-PI-DT[1]) is missing or is prior to the scheme's last PI date (or if the first component is 'GMP' and the PI calculated date is missing or prior to the 6th April prior to the last PI date)	employments with a date left following the scheme's last PI date or those with a an 'X' PI Marker (PEN-PI-MKR)	Yes	None
		Fail F	PEN or GMP is not the first pension type (PEN-TYPE)	N/A	No	N/A

Section	Sub-section	Condition	Fail	Rule	Exclusions		Status
	Transfer In Details 1	Current Status is 1,2,4,5 or T with a Transfer Details record present	Fail A	Transfer Received date (ADD-TV-DT) is blank or on or before 01/01/1900	N/A	Yes	Non current status 1,2 or 4
			Fail B	Transfer value (ADD-TV) is blank or zero	Interfund (ADD-TYPE = 'INTERFND') transfers received pre accrual change date for England and Wales funds (pre end of final salary accrual for Scotland and NI) that credited (ADD-BS-CR) less than 183 days service	Yes	Non current status 1,2 or 4
			Fail C	Back service credit (ADD-BS-CR) and retained pension (ADD-RETP) are both blank or zero.	N/A	No	N/A
			Fail D	Back service credit (ADD-BS-CR) is present, but service history does not have entry starting (HIST-START) on the same date and the transfer service start (ADD-FROM)	Transfers with no back service credit (ADD-BS-CR = 0 or blank)	No	N/A
			Fail E	Transfer type (ADD-TYPE) is not valid (one of "CLUB", "INTERFND", "NON CLUB", "PERSONAL", "RESTITUTIO" or "INTRAFND")	N/A	No	N/A
			Fail F	Date received (ADD-TV-DT) is blank, invalid (on or before 01/01/1900) or earlier than date joined fund (DJF)	N/A	No	N/A
	Transfer In Details 2	Current Status is 1,2,4,5 or T with a Transfer Details record present	Fail A	Previous scheme (ADD-PR-SCH) and previous employer (ADD-PR-EMP) are both blank	N/A	No	N/A
Member Details	Contributions	Current Status is 1, 2, 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	Total Paid Including Interest (TCI-TOTAL) is blank or less than (or equal to) a small figure (default of £1.00) agreed with customer	Employment type (CLASS) is Councillor (CM) or Date Joined Fund (DJF) equal to or later than the last posting date	No	N/A
			Fail B	For status 1 members the latest cont date (CONT-DATE) prior to the last posting date and have a corresponding figure (SCH-CONT) (not 0)	Current status not '1' or DJF Date Joined Fund (DJF) equal to or later than the last posting date	No	N/A
	Date Joined Scheme	Current Status is 1, 2, 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	Any of Date Joined Scheme (DJF), Date of Birth (DOB) and/or Date commenced current service (DCCPS) Joined Fund are either blank or earlier than or equal to 1/1/1900	N/A	Yes	None
			Fail B	Date Joined Fund (DJF) is earlier or equal to Date of Birth (DOB) plus 15 years	Null DATE-LEFT or DOB	No	N/A

	Date of Leaving	Current Status is 1, 2, 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	Non-active member has blank or invalid date left (DATE-LEFT)	Status 1	Yes	None
			Fail B	Date joined fund (DJF) blank or on or before 01/01/1900	Status 1	Yes	None
			Fail C	Date joined fund (DJF) later than or equal to date left (DATE-LEFT)	Status 1, Fail A cases	Yes	None
			Fail D	Date Left (DATE-LEFT) present for an active member without a previous status 4 or 9	Status not 1 or has previous status 4 or 9 entry	No	N/A
	Employer Details	Current Status is 1, 2, 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	Current employer (LOCATION) is blank	N/A	Yes	None
			Fail B	Date Joined employer (DT-JOIN-EM) is either blank or earlier than or equal to 1/1/1900	N/A	Yes	None
			Fail C	Date Joined employer (DT-JOIN-EM) must be earlier than date of birth (DOB) plus 15 years	Null DT-JOIN-EMP or DOB	No	N/A
			Fail D	Employment type (CLASS) is blank	N/A	No	N/A
	Leavers	Current Status is 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	Date Left (DATE-LEFT) is either blank or is earlier than or equal to 1/1/1900	N/A	Yes	None
			Fail B	Date Joined Scheme (DJF) is either blank or is earlier than or equal to 1/1/1900	N/A	Yes	None
			Fail C	Date Left (DATE-LEFT) is earlier than Date Joined Scheme (DJF)	Null DATE-LEFT or DJF	No	N/A

Salary (Final Salary members)	Current Status is 1, 2, 4, 5, 9 or T with service start date (HIST-START) (or date joined fund (DJF) if no service history present) prior to the final salary accrual end date. and member is not pension credit member (CLASS <> 'PC')	Fail A	Blank or invalid latest Pensionable Remuneration Date (PEN-REM-DT)	Employment type (CLASS) is Councillor (CM)	Yes	Non current status 1,2 or 4
		Fail B	For non-active members, neither of the last two pensionable remuneration dates (PEN-REM-DT) equal the member's date of leaving (DATE-LEFT)	Current status (STATUS) is 1 ,2 or 9; or Employment type (CLASS) is Councillor (CM)	No	N/A
		Fail C	The latest Remuneration entry is on a valid date (PEN-REM-DT) but has no amount (PEN-REM)	N/A	No	N/A
		Fail D	Deferred with no, or less than (or equal to) a nominal, Final Pay (DEF-PENREM) value	Not current status 4	No	N/A
		Fail E	Pensioner with no, or less than (or equal to) a nominal, Final Pay (PEN-PS-REM) value	Not current status 5 or T	No	N/A
		Fail F	Active without a pensionable remuneration entry on or after the latest posting date	Not current status 1, Employment type (CLASS) is Councillor (CM)	No	N/A
Service	Current Status is 1, 2, 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	If DCCPS > DJF, and DJF < 31/03/2014 (15 S&NI)) then service history must be present	N/A	No	N/A

Local Government Pension Scheme

Data Quality Report

Lothian Pension Fund

Data Quality Report

Diane Sinclair

Pensions Employer and Member Manager

Lothian Pension Fund

Version November 2022

Contents

1. Summary

1.1 Introduction

The Pensions Regulator (TPR) is the UK regulator of work-based pensions schemes. It works with trustees, employers, pension specialists and business advisors giving guidance on what is expected of them when running, overseeing or advising a public service pension scheme. To manage a scheme properly the scheme needs to make sure it has accurate, complete and up-to-date records as failure to do so means the scheme is at risk of not meeting their legal obligations.

Lothian Pension Fund (the Fund), in the role of scheme administrator, is expected to regularly review the quality of the scheme data but must do so at least once a year. TPR have created data quality measures for common and scheme-specific data and scores are based on data being present and accurate. These data scores are submitted in each scheme return to TPR.

1.2 Data Quality Analysis Tool

Since 2018 the Fund have employed Heywood's data quality service to test and analyse the data to satisfy TPR measures. This was carried out once a year using a cut of the Funds August data. Heywood would supply the overall scores and data quality reports. In April 2021 the Fund procured Heywood's new analytical tool "Insights" which uses tableau business intelligence software. The data quality tests and dashboards are included in the tool. This has given the Fund greater control as it allows access to results daily, giving comfort that the rectification work being undertaken is correct.

1.3 Benchmark

TPR requires schemes to have effective processes for maintaining data and continually improve the quality of the data held. The Fund has set targets for common and scheme-specific scores in excess of 95% in both instances.

2. TPR Test Results

2.1 TPR Common Data Test Results

The percentage of member records that did not fail any of the tests deemed to be in the core list of TPR tests is **98.6%.** This is the figure that will be quoted on the scheme return to TPR.

Data Quality | Summary

98.6%

TPR Pass Rate %

2.2 TPR Scheme-specific Data Test Results

The percentage of member records that did not fail any of the tests deemed to be in the core list of TPR tests is **99.43%**. This is the figure that will be quoted on the scheme return to TPR.

LGPS Scheme Specific Data Quality | Overall Summary

99.43%

TPR Pass Rate %

3.2 Historical Results

The common data score increased by 0.16% from last year's return whilst the scheme specific score was maintained.

LPF TPR Scores
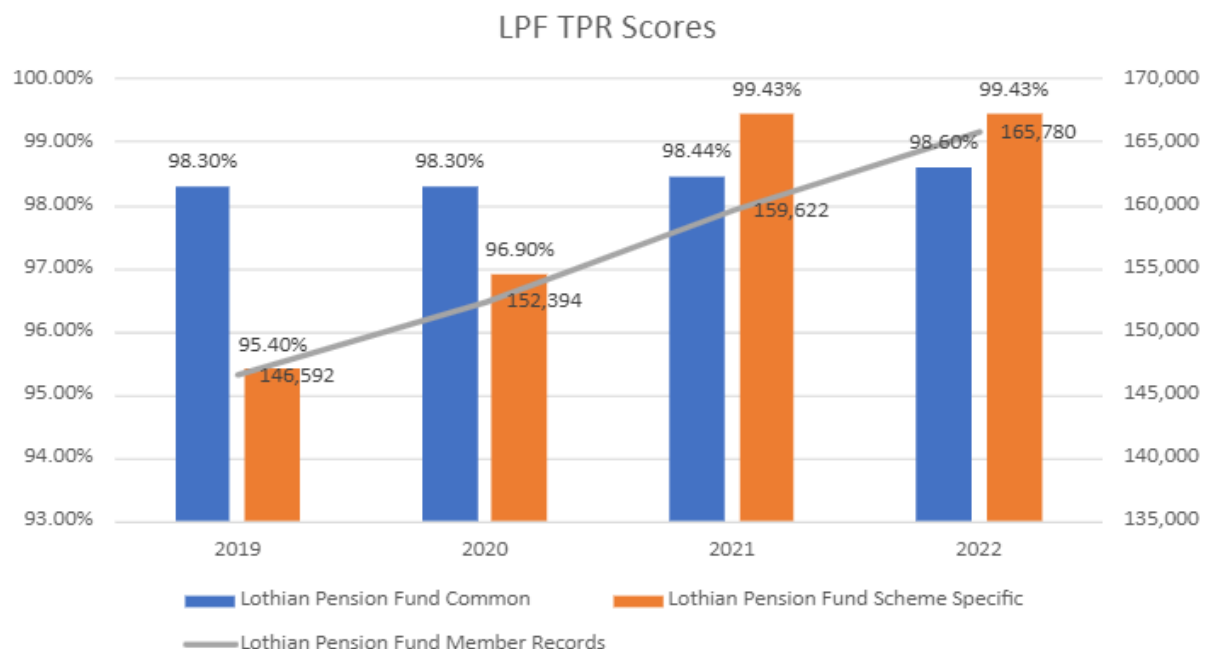
3. Analysis of Data Results

3.1 Membership Records in Scope

The 2021 tests were conducted on 165,780 member records an increase of 6,158 on 2021. Not all member records are required to be tested under each data category. Appendices A and B detail the test conditions and exclusions.

3.2 Summary of Common Data Results

The following graph indicates the Fund's performance for each data category extracted on 23rd September 2022.

TPR Pass Rate % by Test Category

Test Category	Pass Rate
Ni Number (TPR)	99.96%
Name (TPR)	100.00%
Sex / DOB (TPR)	100.00%
Date Commenced (TPR)	100.00%
Status (TPR)	100.00%
Invalid Data View (TPR)	100.00%
Address (TPR)	97.79%
Valid Data View (TPR)	100.00%

The score for the Address category is the only category not to achieve 99% or above. The following table shows the breakdown of the number of records that failed this category's tests.

Fail A: Address record does not exist	1
Fail B: Address record exists, but line 1 (ADD-LINE-1) is blank	7
Fail C: Gone Away (ADD-GONAWY) indicator is set	1,930
Fail D: Postcode is blank and address is not overseas	19

1,930 member records were recorded as "gone away" at the time of data extraction. Details of the Fund's proposals to improve this test score is outlined in the Data Correction Plan.

3.3 Summary of Scheme-specific Data Results

The graph below indicates the Fund's performance for each data category extracted on 23rd September 2022.

Grand Total | TPR Pass Rate % by Test Category

Test Category	Pass Rate
Member Details	99.99%
Member Benefits	99.70%
CARE	98.91%
HMRC	99.84%
Contracting Out	99.94%

The following tables show the percentage of members without a failure for the above categories' tests.

Member Details

Date of Leaving	99.99%
Leavers	100.00%
Date Joined Scheme	100.00%
Employer Details	100.00%
Remuneration FS	100.00%
Contributions	100.00%
Service	100.00%

Member Benefits

Divorce Details	100.00%
Transfer In 1	100.00%
Transfer In 2	100.00%
AVC Details	99.95%
Total Deferred	100.00%
Deferred Tranches	99.38%
Total Pension	99.98%
Pension Tranches	99.87%
Total Dependant	100.00%
Dep. Tranches	100.00%

CARE

CARE Data	98.91%

HMRC

BCE2	99.99%
BCE5	100.00%
BCE6	99.97%
BCE7	100.00%
BCE8	100.00%
LTA Charge	99.95%
AA Charge	99.70%

Contracting Out

Dt. Contracted Out	100.00%
NI History	99.82%
Pre 88 GMP	99.94%
Post 88 GMP	99.77%

Appendix A – Common Data Test Conditions and Exclusions

Category	Fail Condition	Test Condition	Members Excluded from Test	Included in TPR Tests?	Additional TPR Exclusions / Notes
Address	Fail A	Address record does not exist	Leavers (Status 3) and Deaths (Status 7)	Yes	None
	Fail B	Address record exists, but line 1 (ADD-LINE-1) is blank	Leavers (Status 3) and Deaths (Status 7)	Yes	None
	Fail C	Gone Away (ADD-GONAWY) indicator is set	Leavers (Status 3) and Deaths (Status 7)	Yes	None
	Fail D	If the address is not overseas, the Postcode (POSTCODE) is blank	Leavers (Status 3) and Deaths (Status 7)	Yes	None
	Fail E	If the address is not overseas, the Postcode is not the correct format (1st letter =Q, V or X, 2nd letter is I, J or Z, 3rd, 4th or 5th character is not a space)	Leavers (Status 3) and Deaths (Status 7)	No	N/A
Date Commenced and NRD	Fail A	Date Joined fund (DJF / DJS) is blank	Status 6 or Status O or previous status 6	Yes	None
	Fail B	Date Joined Fund is earlier than Date of Birth plus 15 years	Status 6 or Status O or previous status 6	No	N/A
Name	Fail A	Surname (SURNAME) is blank	None	Yes	None
	Fail B	Forenames (FORENAMES) is blank	None	Yes	None
	Fail C	Initials (INITS) is blank	None	No	N/A

Name	Fail A	Surname (SURNAME) is blank	None	Yes	None
	Fail B	Forenames (FORENAMES) is blank	None	Yes	None
	Fail C	Initials (INITS) is blank	None	No	N/A
NI Number	Fail A	NI Number (NI-NUMBER) is blank	None	Yes	None
	Fail B	NI number is temporary (commences TN)	Child pension members (DEPND-TYPE = 'C'),	Yes	Current status 3 (no liability) and 7 (death) members excluded
	Fail C	NI number does not adhere to standard (Neither of the first two letters can be D, F, I, Q, U or V. The second letter cannot be O. Prefixes BG, GB, KN, NK, NT, TN (checked in fail B) and ZZ are not used. Suffix must be A, B, C or D. Characters 3-8 must be numbers)	None	No	N/A
Sex and Date of Birth	Fail A	Sex (SEX) is blank	None	Yes	None
	Fail B	Sex is not Male or Female	None	Yes	None
	Fail C	Date of Birth (DOB) is blank	None	Yes	None
	Fail D	Date of Birth is earlier than or equal to 01/01/1900	Leavers (Status 3) and Deaths (Status 7)	Yes	None
Status	Fail A	Status (STATUSKEYF) is blank	None	Yes	None
	Fail B	Status is not 1-9, T or O	None	Yes	None
	Fail C	Status on member summary (STATUSKEYF) does not match that on basic details (STATUS[1])	None	No	N/A

Status and Invalid Data View	Fail A	Exit details should not be present unless status is 3, 7 or 9 or a previous status is 9 and the current status is 1, 2, 4, 5 or T	As per Test Condition	No	N/A
	Fail B	Deferred details should not be present unless status is 4 or a previous status is 4 and the current status is 1, 2, 3, 5, 7 or T	As per Test Condition	No	N/A
	Fail C	Pension details should not be present unless status is 5 or T or a previous status is 5 or T and the current status is 1, 2, 3, 4 or 7	As per Test Condition	No	N/A
	Fail D	Dependant details should not be present unless status 6 or a previous status is 6 and the current status is 3 or 7	As per Test Condition	No	N/A
Status and Valid Data View	Fail A	Deferreds who do not have deferred details data view	All but status 4	No	N/A
	Fail B	Pensioners who do not have pension details data view	All but status 5 and T	No	N/A
	Fail C	Dependant Pensioners who do not have dependant details data view	All but status 6	No	N/A
	Fail D	Leavers from active or deferred who do not have exit details data view	All but status 7 or 9, with a previous status of 1,2 or 4	No	N/A
	Fail E	Death from pensioner status does not have a relevant date pension ceased	All but Status 7 with a previous status of 5 or T	No	N/A
	Fail F	Death from dependant pensioner status does not have a relevant date pension ceased	All but Status 7 with a previous status of 6	No	N/A

Appendix B – Scheme-specific Data Test Conditions and Exclusions

Category	Sub Category	Sub Category Eligibility	Fail Condition	Test Condition	Members Excluded from Test	Included in TPR Tests?	Additional TPR Exclusions / Notes
CARE	CARE Data	Current status is 1 or status is 2/4/5/9/A with date left is after the end of Final Salary, with a date joined fund prior to current CARE year start. (Day after last posting date). Member is not a pension credit member (CLASS = 'PC') or a England /Wales site councillor member (CLASS = 'CM')	Fail A	CARE service member has no main CARE tranche (CARE-BNCDE = 'LGPSMAIN' or 'LGPSS050')	member employments with no service (DJF to DATE-LEFT/today or service history line spanning the period) between end of final salary and the last scheme posting date	No	N/A
			Fail B	Member has a valid CARE list entry (for a valid tranche code) ending on each 31March between Date Joined (or Care revaluation start or last rehire date (where status 4/9 exists with subsequent status 1) if later) and the current posting date (or date left if sooner)	members whose date left (DATE-LEFT) was prior to the first CARE revaluation date, or date joined (DJF) was after the last scheme posting date.	Yes	None
			Fail C	For each contribution entry during CARE accrual dated 31/03/yyyy (within the Fail B period above) with an amount over zero, there is a corresponding 31/03/yyyy period ending entry on the CARE benefit list for a valid tranche code with a salary amount over zero.	N/A	No	N/A
Contracting Out	Date Contracted Out	Current Status is 1,2,4,5 or T, Member is not a pension credit member (employment type 'PC' excluded), and member does not have a reduced NI indicator (RED-NI) of X,Y or N	Fail A	Date contracted out SSPA75 is invalid or blank and DJF is prior to 6/4/16	DJF after 05/04/2016	Yes	None
			Fail B	Date contracted out SSPA75 is valid (not blank or on or before 01/01/1900) and prior to 06/04/1978	N/A	Yes	None
			Fail C	Date contracted out SSPA75 is later than 05/04/2016	N/A	Yes	None
	NI Contributions/ Earnings History	Current Status is 4 or 5, with date contracted out between 6/4/78 and 5/4/97. Member is not a pension credit member (employment type 'PC' excluded), and member does not have a reduced NI indicator (RED-NI) of X,Y or N, and NI Table (NI-TABLE) code is not 'E'	Fail A	A Status 4 member is missing Date Left Active Service (DATE-LEFT) or a Status 5 member is missing both Date Left Active Service and Date of Retirement (STATUS-DATE[1])	Null	Yes	None
			Fail B	For one or more period end NI posting, the amount is missing or zero	N/A	No	N/A
			Fail C	There is not a separate NI Contribution entry for each April 5th between Date Contracted Out and 5/4/97 (or 5/4 after Date Ret if earlier)	N/A	No	N/A
			Fail D	GMP is not present on the NI details for status 1 and 2 and on GMP details for status 4, 5 & T	Null	No	N/A

			Fail E	Both Fail C and Fail D occurred	Null	Yes	None
	Post 88 GMP	Current Status is 4,5 or T, Date of leaving (DATE-LEFT) post 05/04/1988 and date of contracting out is prior to 06/04/1997, Member is not a pension credit member (employment type 'PC' excluded), and member does not have a reduced NI indicator (RED-NI) of X,Y or N	Fail A	Total GMP (GMP-T-DOL) at exit is missing or zero	Null	Yes	None
			Fail B	Post 88 GMP (GMP-T-ADOL) at exit is missing or zero	Null	Yes	None
			Fail C	Post 88 GMP at Exit (GMP-T-ADOL) is not divisible by 52	Null	Yes	None
	Pre 88 GMP	Current Status is 4,5 or T, Date of leaving (DATE-LEFT) post 06/04/1978 and date of contracting out is prior to 06/04/1988, Member is not a pension credit member (employment type 'PC' excluded), and member does not have a reduced NI indicator (RED-NI) of X,Y or N	Fail A	Total GMP (GMP-T-DOL) at exit is missing or zero	Null	Yes	None
			Fail B	Total GMP at exit (GMP-T-DOL) less post 88 GMP at exit (GMP-T-ADOL) is negative	Null	Yes	None
			Fail C	Total GMP at exit (GMP-T-DOL) less post 88 GMP at exit (GMP-T-ADOL) is not divisible by 52	Null	Yes	None
HMRC	AA Charge	Current Status is 1	Fail A	Employments' latest annual allowance PIP end date (AAL-PIPEND) is prior to the latest expected PIP end date	Employments that have a status 4 or 9 with date left prior to the last expected PIP end date, and a subsequent status 1 date after the expected PIP end date	Yes	None
			Fail B	Employment has a annual allowance entry where either the scheme pays indicator (AAL-SCHPAY) is set but the scheme pays debit amount (AAL-SPCSH1) is not greater than zero, or vice versa	N/A	No	N/A
	BCE2	Current status is 5 or T with status date after 05/04/2006	Fail A	Latest crystallisation date (CRYS-CRSYSD) entry is missing, is not a valid date or is earlier than date left	N/A	Yes	None

			Fail B	PLA amount (CRYS-PLA) is blank or zero	N/A	Yes	None
			Fail C	PLA % (CRYS-PLAPC) is blank or zero	N/A	No	N/A
BCE5	Current status is 4 or T		Fail A	Member is aged over 75	N/A	No	N/A
BCE6	Current status is 5 or T with status date after 05/04/2006, and aged under 75 at the status date		Fail A	Latest crystallisation date (CRYS-CRSYSD) entry is missing, is not a valid date or is earlier than date left	N/A	No	N/A
			Fail B	Member has retirement grant (PEN-TOT-AL > 0) but PCLS (CRYS-PCLS) is blank	Retirement Grant (PEN-TOT-AL) blank or zero	Yes	None
			Fail C	There is a serious ill health crystallisation date (CRYS-ILLD) but no amount (CRYS-ILLA), or vice versa	N/A	No	N/A
BCE7	Current Status is 7, and current status date is post 05/04/2006 and within 5 years of status 5 date entry		Fail A	Death grant (CDTC-TOTLS) is blank or zero	N/A	No	N/A
			Fail B	Death grant (CDTC-TOTLS) is greater than zero, but the crystallisation amount (CDTC-CVAL) or percent (CDTC-CVALP) is blank or zero	Death grant (CDTC-TOTLS) greater than 0	No	N/A
BCE8	Current status is 3 and date left (DATE-LEFT) is after 05/04/2006, and have a overseas transfer date present (CRYS-TFRD)		Fail A	overseas transfer date present (CRYS-TFRD) is blank or invalid, or earlier than date left	N/A	No	N/A
			Fail B	QROPS transfer amount (CRYS-TFRA) is blank or zero	N/A	No	N/A
			Fail C	DOB is not a valid date	N/A	No	N/A

		Fail D	Age at transfer dates (CRYS-TFRD) is 75 or greater	N/A	No	N/A
	LTA Charge Current status is 5 or T with status date after 05/04/2006, and doesn't have either all enhanced protection or PCLS payment BCE data fields completed (i.e. both CRYS-BCEVD/ CRYS-BCEVA/ CRYS-BCEVI and CRYS-PPD / CRYS-PPA / CRYS-PPI are not all present)	Fail A	the total PLA used percentage (CRYS-TPPC) is greater than 100, but no LTA charge amount is completed (CRYS-LTACH and CRYS-LTA25 and CRYS-LTA55 are all blank or zero)	Total PLA used percentage (CRYS-TPPC) is less than or equal to 100	Yes	None
Member Benefits	AVC Details Current Status is 1,2,4,5 or T with a AVC Details record present	Fail A	Contract start date (AVC-START) is blank or invalid (incl. on or before 01/01/1900)	N/A	Yes	Non current status 1,2 or 4
		Fail B	Contract end date (AVC-TE-DUE) is blank, invalid (incl. on or before 01/01/1900) or prior to the start date (AVC-START)	N/A	No	N/A
		Fail C	If the contract type (AVC-TYPE) is an added years type ("A", "B", "G", "L", "P", "R" or "S") but the added years amount (AVC-ADDY) is blank or zero	N/A	Yes	Non current status 1,2 or 4
		Fail D	If the contract type (AVC-TYPE) is an added pension ('H' or 'M') but the bought pension amount (AVC-P75T) is blank or zero, or greater than or equal to the scheme maximum	N/A	Yes	Non current status 1,2 or 4
	Divorce Current Status is 1,2,4,5 or T with a Pension Sharing Record present	Fail A	Initial pension value (DVC-TOTINI) is missing	N/A	Yes	None
		Fail B	Calculation date (DVC-CALDTE) blank or before 01/12/2000	N/A	Yes	None
		Fail C	Payment date (DVC-PAYDTE) blank or before 01/12/2000	N/A	Yes	None
		Fail D	Pension credit amount (DVC-TVAMT) is missing or zero	N/A	Yes	None
		Fail E	Pension debit amount (DVC-CONAMT) is missing or zero	N/A	Yes	None

			Fail F	Percentage split (DVC-PCSPLT) is missing or zero or over 100.00	N/A	Yes	None
	Total Gross Dependant Pension	Current Status is 6	Fail A	Total initial pension value (DEP-TOT-IP) is missing or zero	N/A	Yes	None
			Fail B	Total initial pension value (DEP-TOT-IP) is present, but less than a nominal amount	N/A	No	N/A
			Fail C	Total current pension value (DEP-TOT-CP) is missing or zero	N/A	Yes	None
			Fail D	Total current pension value (DEP-TOT-CP) is present, but less than a nominal amount	N/A	No	N/A
			Fail E	Date for PI calculation (DEP-INC-DT) must be present	N/A	Yes	None
	Total Gross Pension	Current Status is 5 or T	Fail A	Total initial pension value (PEN-TOT-IP) is missing or zero	N/A	Yes	None
			Fail B	Total initial pension value (PEN-TOT-IP) is present, but less than a nominal amount	N/A	No	N/A
			Fail C	Total current pension value (PEN-TOT-CP) is missing or zero	N/A	Yes	None
			Fail D	Total current pension value (PEN-TOT-CP) is present, but less than a nominal amount	N/A	No	N/A
			Fail E	Date for PI calculation must be present and later than date joined fund (DJF)	N/A	Yes	None

Total Original Deferred Benefit	Current Status is 4	Fail A	Total initial pension value (DEF-TOT-IP) is missing or zero	N/A		Yes	None
		Fail B	Total initial pension value (DEF-TOT-IP) is present, but less than a nominal amount	N/A		No	N/A
		Fail C	Total current pension value (DEF-TOT-CP) is missing or zero	N/A		Yes	None
		Fail D	Total current pension value (DEF-TOT-CP) is present, but less than a nominal amount	N/A		No	N/A
		Fail E	PI Calculation date (DEF-INC-DT) is missing or invalid, or prior to date joined fund (DJF)	N/A		Yes	None
		Fail F	First entry of PI calculated date (DEF-PI-DT[1]) is missing is prior to the scheme's last PI date	employments with a date left following the scheme's last PI date	No	N/A
Tranches of Dependant Pension	Current Status is 6	Fail A	PEN pension type (DEP-TYPE) has a value (DEP-I-PEN) less than or equal to a nominal amount	N/A		Yes	None
		Fail B	Latest PI calculated date (PEN-PI-DT) is missing is prior to the scheme's last PI date	N/A		No	N/A
Tranches of Original Deferred Benefit	Current Status is 4	Fail A	A 'PEN' pension type (DEF-TYPE) does not exist or has an initial value less than a nominal amount.	N/A		Yes	None
		Fail B	Initial Pension (DEF-I-PEN) components for (DEF-TYPE) PEN + UPEN + TAPE does not equal total initial pension (DEF-TOT-IP)	N/A		No	N/A

		Fail C	an employment with service between accrual rate change and end of final salary with a missing or less than a nominal value (DEF-I-PEN) PN60 (DEF-TYPE) pension component.	Councillor members(CLASS = 'CM') (in England/Wales sites only) or Pension Credit (CLASS = 'PC'). Members whose service dates (either from DJF to DATE-LEFT) or on service history (with SERV-TYPE = 'L') do not span the period from accrual change to end of final salary (01/04/2008 to 31/03/2014 in England and Wales)	Yes	None
		Fail D	Member with post FS End service has no 'CARE' (DEF-TYPE) tranche or has one with a value (DEF-I-PEN) less than or equal to a nominal figure	Councillor members(CLASS = 'CM') (in England/Wales sites only) or Pension Credit (CLASS = 'PC'). Members whose date of leaving (DATE-LEFT) is pre final salary end date.	Yes	None
		Fail E	Member with 50/50 CARE tranche (CARE-BNCDE = 'LGPS5050' Or 'TVINLG50') has no corresponding pension component (DEF-TYPE = 'CP50') or one with a value (DEF-I-PEN) less than or equal to a nominal figure	N/A	No	N/A
		Fail F	Member with pre FS accrual change service has no 'RA' (DEF-TYPE) tranche or has one with a value (DEF-I-PEN) less than or equal to a nominal amount	Pension Credit (CLASS = 'PC') or members whose date of joining (DJF) and any service history line that starts (HIST-START) after the FS accrual rate change date	No	N/A
Tranches of Pension	Current Status is 5 or T	Fail A	PEN pension type (PEN-TYPE) has an initial value less than a nominal amount.	N/A	No	N/A
		Fail B	Member with service between 01/04/2008 (09 S&NI) and 31/03/2014 (15 S&NI) has no 'PN60' tranche or has one with a value less than a small figure	Councillor members(CLASS = 'CM') (in England/Wales sites only) or Pension Credit (CLASS = 'PC'). Or Members whose service history periods (with SERV-TYPE = 'L') do not span the period from accrual change to end of final salary (01/04/2008 to 31/03/2014 in England and Wales)	Yes	None
		Fail C	Member with post FS end service has no 'CARE' (PEN-TYPE) tranche or has one with a value (PEN-I-PEN) less than or equal to a nominal figure	Councillor members(CLASS = 'CM') (in England/Wales sites only) or Pension Credit (CLASS = 'PC'). Or members whose date of leaving (DATE-LEFT) is pre final salary end date.	Yes	None
		Fail D	Member with 50/50 CARE tranche (CARE-BNCDE = 'CARE5050' Or 'TVIN5050') has no corresponding pension component (PEN-TYPE = 'CP50') or one with a value (PEN-I-PEN) less than or equal to a nominal figure	N/A	Yes	None
		Fail E	First entry of PI calculated date (PEN-PI-DT[1]) is missing or is prior to the scheme's last PI date (or if the first component is 'GMP' and the PI calculated date is missing or prior to the 6th April prior to the last PI date)	employments with a date left following the scheme's last PI date or those with a an 'X' PI Marker (PEN-PI-MKR)	Yes	None
		Fail F	PEN or GMP is not the first pension type (PEN-TYPE)	N/A	No	N/A

	Transfer In Details 1	Current Status is 1,2,4,5 or T with a Transfer Details record present	Fail A	Transfer Received date (ADD-TV-DT) is blank or on or before 01/01/1900	N/A	Yes	Non current status 1,2 or 4
			Fail B	Transfer value (ADD-TV) is blank or zero	Interfund (ADD-TYPE = 'INTERFND') transfers received pre accrual change date for England and Wales funds (pre end of final salary accrual for Scotland and NI) that credited (ADD-BS-CR) less than 183 days service	Yes	Non current status 1,2 or 4
			Fail C	Back service credit (ADD-BS-CR) and retained pension (ADD-RETP) are both blank or zero.	N/A	No	N/A
			Fail D	Back service credit (ADD-BS-CR) is present, but service history does not have entry starting (HIST-START) on the same date and the transfer service start (ADD-FROM)	Transfers with no back service credit (ADD-BS-CR = 0 or blank)	No	N/A
			Fail E	Transfer type (ADD-TYPE) is not valid (one of "CLUB", "INTERFND", "NON CLUB", "PERSONAL", "RESTITUTIO" or "INTRAFND")	N/A	No	N/A
			Fail F	Date received (ADD-TV-DT) is blank, invalid (on or before 01/01/1900) or earlier than date joined fund (DJF)	N/A	No	N/A
	Transfer In Details 2	Current Status is 1,2,4,5 or T with a Transfer Details record present	Fail A	Previous scheme (ADD-PR-SCH) and previous employer (ADD-PR-EMP) are both blank	N/A	No	N/A
Member Details	Contributions	Current Status is 1, 2, 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	Total Paid Including Interest (TCI-TOTAL) is blank or less than (or equal to) a small figure (default of £1.00) agreed with customer	Employment type (CLASS) is Councillor (CM) or Date Joined Fund (DJF) equal to or later than the last posting date	No	N/A
			Fail B	For status 1 members the latest cont date (CONT-DATE) prior to the last posting date and have a corresponding figure (SCH-CONT) (not 0)	Current status not '1' or DJF Date Joined Fund (DJF) equal to or later than the last posting date	No	N/A
	Date Joined Scheme	Current Status is 1, 2, 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	Any of Date Joined Scheme (DJF), Date of Birth (DOB) and/or Date commenced current service (DCCPS) Joined Fund are either blank or earlier than or equal to 1/1/1900	N/A	Yes	None
			Fail B	Date Joined Fund (DJF) is earlier or equal to Date of Birth (DOB) plus 15 years	Null DATE-LEFT or DOB	No	N/A

Date of Leaving	Current Status is 1, 2, 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	Non-active member has blank or invalid date left (DATE-LEFT)	Status 1	Yes	None
		Fail B	Date joined fund (DJF) blank or on or before 01/01/1900	Status 1	Yes	None
		Fail C	Date joined fund (DJF) later than or equal to date left (DATE-LEFT)	Status 1, Fail A cases	Yes	None
		Fail D	Date Left (DATE-LEFT) present for an active member without a previous status 4 or 9	Status not 1 or has previous status 4 or 9 entry	No	N/A
Employer Details	Current Status is 1, 2, 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	Current employer (LOCATION) is blank	N/A	Yes	None
		Fail B	Date Joined employer (DT-JOIN-EM) is either blank or earlier than or equal to 1/1/1900	N/A	Yes	None
		Fail C	Date Joined employer (DT-JOIN-EM) must be earlier than date of birth (DOB) plus 15 years	Null DT-JOIN-EMP or DOB	No	N/A
		Fail D	Employment type (CLASS) is blank	N/A	No	N/A
Leavers	Current Status is 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	Date Left (DATE-LEFT) is either blank or is earlier than or equal to 1/1/1900	N/A	Yes	None
		Fail B	Date Joined Scheme (DJF) is either blank or is earlier than or equal to 1/1/1900	N/A	Yes	None
		Fail C	Date Left (DATE-LEFT) is earlier than Date Joined Scheme (DJF)	Null DATE-LEFT or DJF	No	N/A

Salary (Final Salary members)	Current Status is 1, 2, 4, 5, 9 or T with service start date (HIST-START) (or date joined fund (DJF) if no service history present) prior to the final salary accrual end date. and member is not pension credit member (CLASS <> 'PC')	Fail A	Blank or invalid latest Pensionable Remuneration Date (PEN-REM-DT)	Employment type (CLASS) is Councillor (CM)	Yes	Non current status 1,2 or 4
		Fail B	For non-active members, neither of the last two pensionable remuneration dates (PEN-REM-DT) equal the member's date of leaving (DATE-LEFT)	Current status (STATUS) is 1 ,2 or 9; or Employment type (CLASS) is Councillor (CM)	No	N/A
		Fail C	The latest Remuneration entry is on a valid date (PEN-REM-DT) but has no amount (PEN-REM)	N/A	No	N/A
		Fail D	Deferred with no, or less than (or equal to) a nominal, Final Pay (DEF-PENREM) value	Not current status 4	No	N/A
		Fail E	Pensioner with no, or less than (or equal to) a nominal, Final Pay (PEN-PS-REM) value	Not current status 5 or T	No	N/A
		Fail F	Active without a pensionable remuneration entry on or after the latest posting date	Not current status 1, Employment type (CLASS) is Councillor (CM)	No	N/A
Service	Current Status is 1, 2, 4, 5, 9 or T and member is not pension credit member (CLASS <> 'PC')	Fail A	If DCCPS > DJF, and DJF < 31/03/2014 (15 S&NI)) then service history must be present	N/A	No	N/A

LOTHIAN
PENSION FUND

Data Improvement Plan

October 2022

Summary

This improvement plan primarily aims to address the key issues identified in the Fund's Annual Data Quality review which took place in September 2022 and demonstrates the appropriate steps the Fund is taking to tackle the issues raised in the review and how it will improve the data held.

The Fund also undertakes additional measures to ensure that accurate pension benefits are communicated and paid to the correct member or beneficiary.

As result of the McCloud judgement of the public sector pension reforms, significant time and resource will be required for the data collection, analysis, record updates and rectification work to be undertaken by the Fund.

Compulsory onboarding to The Pensions Dashboards eco-system for public sector pension schemes is likely to be postponed to September 2024. The Money and Pension Service can authorise applications to onboard early, which the Fund will take into consideration. Data rectification work prior to onboarding is expected but the work undertaken for TPR should assist in keeping this to a minimum.

Resource will also be essential for the cleansing and preparation of data for the triennial valuation due to be carried out in 2023.

Plan Objectives

- Maintain complete and accurate records to ensure the timeously payment of correct pension benefits.

- Identify members with "gone-away" status and undertake tracing exercises to locate new addresses.

- To prevent and detect fraudulent claims.

- Improve the member online experience by expanding their self-service capabilities.

- Engage with employers to improve the timeliness and quality of member data

- Data collection, analysis and record updates in readiness for the McCloud remedy

- Data rectification in readiness for onboarding the Pensions Dashboard

Outcomes

Objective	Action	Measure	Resource	Timescale
Maintain complete and accurate records to ensure the timeously payment of correct pension benefits	Improvement in the Fund's TPR Data scores for Common and Scheme Specific Data through analysis of records, creation and implementation of rectification plan	Maintain/increase in TPR data scores	Lothian Pension Fund Staff Data analytical tool	September 2023
	The Fund will utilise the Hymans data portal and make corrections where required in preparation for the 2023 valuation submission	Improvement in number of critical errors recorded	Lothian Pension Fund Staff Hymans Data Portal	Summer 2023
Identify members with "gone-away" status and undertake tracing exercise to locate new address	The Fund will carry out annual bulk exercises and online case by case investigations to trace "lost" members.	Reduction in number of members with "gone-away" status	Lothian Pension Fund Staff Accurate Data Services GMG	September 2023
To prevent and detect fraudulent claims	The Fund will participate in the biennial National Fraud Initiative	Results will be used to suspend or stop pension payments	Lothian Pension Fund Staff NFI Portal	Next Initiative 2022/23

	The Fund will use a biometric authentication solution for proof of life verification for our overseas pensioners	Results will be used to suspend or stop pension payments	Lothian Pension Fund Staff Crown Agents	September 2023
	The Fund will submit data to the annual Club Vita exercise for analysis	Results will be used to investigate "suspicious" payments and cleanse longevity data	Lothian Pension Fund Staff Club Vita portal	September 2023
	The Fund will receive Daily Updates from Tell Us Once	Results will be used to suspend or stop pension payments	Lothian Pension Fund Staff TUO portal	September 2023
	The Fund sill submit monthly data to the LGPS NI Database	Checks will be performed for benefits held with other funds to ensure benefit are paid in compliance with legislation	Lothian Pension Fund Staff LGPS NI Database	September 2023
Improve the member online experience by expanding their self-service capabilities	The Fund will propose new development ideas to the software provider and promote the benefits of the latest enhancements	Increase in self service traffic with corresponding reduction in estimate requests	Lothian Pension Fund Staff Heywood programme developers	Ongoing collaboration
Engage with the employers to improve the timeliness and quality of member data	The Fund will provide quarterly Pension Administration Strategy statistics to employers	Analyse the results and identify employers of concern. Deliver training where improvement required	Lothian Pension Fund staff Employer Staff	September 2023

	The Fund will arrange and attend regular meetings with employers to discuss issues and improvement plans	Improved PAS statistics	Lothian Pension Fund staff Employer Staff	September 2023
	The Fund will provide ongoing employer support in the provision of monthly submissions	Increase in percentage of returns submitted by due date. Reduction in manual rectification work	Lothian Pension Fund staff Employer Staff	September 2023
Data collection, analysis and record updates in readiness for the McCloud remedy	The Fund will obtain relevant data from Employers. Complete an analysis of data received and update member records with "missing" data.	Records complete for McCloud bulk underpin calculation	Lothian Pension Fund staff Employer Staff Analysis tools	Awaiting regulations
Data rectification in readiness for onboarding the Pensions Dashboard	Complete a data sense check on data required for Pensions Dashboard and rectify discrepancies	Records dashboard ready	Lothian Pension Fund staff ISP Analysis tools	September 2024