

WILTSHIRE COUNCIL

WILTSHIRE PENSION FUND COMMITTEE
26 March 2020

WILTSHIRE PENSION FUND DATA IMPROVEMENT STRATEGY & PLAN

Purpose of the Report

1. The purpose of this report is to provide an update on the progress of the Data Improvement Strategy & Plan to Committee.

Background

2. The Pension Regulator recommends that all Funds should review their data quality at least annually and put a Data Improvement Plan in place should they identify any material data issues.
3. For many years, the Fund has recognised the importance of good quality data on nearly all aspects of the running the Fund efficiently and effectively. However, with increasing complexity, acceptance and awareness of the importance of good quality at a national level, officers recognise the need to prioritise data quality even more highly and formalise its approach.
4. Last year, the Fund put in place in strategy which represented a formalisation and summary of existing and new initiatives to improve the Fund's data quality.
5. The Strategy and Plan breakdowns down the issues between the categories 'obtaining good quality data' and 'maintaining good quality data'. The rationale for taking this approach is to make clear the need focus on taking a preventative approach to new data quality issues developing, in addition to resolving existing data issues.
6. Furthermore, some of the improvements planned can be further categorised as short-term or long-term improvements. Many of preventative style approaches identified are longer-term.
7. Existing, identified data issues have been summarised and broken down into the categories outlined in the sub-plans shown in Appendix 1 of the Strategy and Plan while preventative approaches are outlined in Appendix 2.
8. The current strategy can be found on our website:
<https://www.wiltshirepensionfund.org.uk/media/4559/wpf-data-improvement-strategy-and-plan.pdf>

Considerations for the Committee

9. Officers have provided a summary of progress against the strategy, broken down but the categories referred to in paragraph 5.

Obtaining good quality data

10. Since the implementation of the plan, officers have fully onboarded 10 employers on to i-Connect and will be onboarding around twenty-thirty more over the next month (including the largest one). As per the Business Plan actions for 2020-2021, officers are also

entering a three-stage validation process (including pre-submission validations to help employers check data before sending) and have implemented a strategy relating to checking of employer data. Submission forms and spreadsheets are also being reviewed.

11. In the last year, the Fund has launched a new, dedicated employer website with detailed technical information, advice and links to training information. We have also implemented a rolling training plan and webinars to help employers access the information they need to fulfil their data submission requirements.
12. Last autumn, the Fund introduced a new administration strategy including an approach to escalating employer data submission processes. These are now being followed to better identify and raise issues with employers to a successful conclusion.

Maintaining good quality data

13. With the introduction of i-Connect, a large number of data checks are being implemented in line with each employer submitting their monthly returns to help ensure good quality data is maintained after the initial pre-onboarding i-Connect checks are complete. We are also moving from an approach of more adhoc data reconciliations to a data reconciliation programme.
14. The remaining actions in 5b of the strategy are continuing and the Fund will also be undertaking a 'member existence check' for overseas pensioners this year (i.e. checking the members are still alive). We already have a robust process in place with a third party person tracing organisation for UK-based pensioners, which perform regular checks against death registers, but a different approach is required for overseas pensioners due to complications in identifying deaths in other countries.

Improving data quality

15. In addition to the items above, which will help with data quality improvements, the Fund continues to have officers working overtime to help clear backlogs and undertaking a mass mailout for aggregation tasks and tidy up of workflow allocations. This will make it easier to segregate and assign work as appropriate for officers' knowledge and experience.
16. Officers have also been in contact with a third party firm to provide backlog support although this option is expensive and officers wish to complete the work outlined in paragraph 15 first to make it easier to allocate work to a third party as appropriate.

Measuring success

17. The Fund set out three measures of success within the strategy:
 - a). tPR common and conditional data scores: These are reporting with the KPI pack, and as shown in the appendix of this quarter's KPI pack the Fund is already top quartile compared to a sample of peers (approximately a third of LGPS Funds). Whilst further improvement is required, this shows good performance on a relative level.
 - b). KPIs: The regulatory (lower) hurdle, is outlined in the Disclosure Regulation targets. Most scores are already high and two remaining ones are likely to materially improve over the next quarter due to a change in methodology as a part of wider process review. Improvement will then focus on the more aspirational targets set out in the Administration Strategy. Additional resource has been requested to help make improvements, particularly as workloads have risen.

c). Annual Benefit Statements: The 2019 submission rate was lower than hoped (at c95% of actives) due to a number of issues and dual-running of the valuations. A revised end of year process, including a number of pre-end of year data cleansing exercises and the new escalation policy, means the Fund is targeting 99% for this year. The submission deadline is the 31 August each year so the outcome will be available after that date.

Financial Implications

18. There are no direct implications of this plan. The data improvement plans currently plan to use existing resource or software that the Fund has already purchased (e.g. i-Connect).

Risk Assessment

19. This data improvement strategy and plan mainly relates to risk PEN010 on the risk register but also indirectly to other risks such as PEN001 and PEN008.

Legal Implications

20. The proposals in this document will help strengthened the Fund compliance with legislation relating to data

Environmental Impacts of the Proposals

21. There is no known environmental impact of this report.

Safeguarding Considerations/Public Health Implications/Equalities Impact

22. There are no known implications at this time.

Proposals

23. The Committee is asked to note the progress against the Data Improvement Strategy and Plan.

ANDY CUNNINGHAM
Head of Pensions Administration and Relations

Report Author: Andy Cunningham, Head of Pensions Administration and Relations

Unpublished documents relied upon in the production of this report: NONE