**NOTTINGHAMSHIRE FRA**

 **Data Improvement Plan 2020/21**

1. **Introduction**

1.1 This document defines the data improvement plan for Nottinghamshire Fire which is administered by West Yorkshire Pension Fund (the Fund).

1.2 WYPF collects and holds large amounts of digital and paper based data on behalf of the scheme manager 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 scheme manager 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 (tPR) 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 The Firefighters’ Pensions England Scheme Advisory Board issued advice on complying with tPR data requirements in August 2018 and provided updated guidance including how to measure accuracy in October 2019 which can be found at <http://www.fpsregs.org/index.php/adminitration-resources/guides-and-sample-docuements>

1. **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.
	1. 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.
1. **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.
* WYPF as 3rd party administrators ensure the scheme manager complies with tPR’s Code of Practice.
1. **Outcomes**

Outcomes of an improvement in the data held by the administrator 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)
1. **Additional general responsibilities relating to the Data Improvement Policy**

**5.1 WYPF Officers**

WYPF 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**

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

**Ongoing Data Cleansing**

* 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.

* 1. **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.

* 1. **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 decreased by 10%,
* Checks to 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

**Appendix A –Nottinghamshire Fire – Data Scores**

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| **1992 scheme** | **Feb 2021** | **Sept 2021** |
| Common | 96.79 | 96.25 |
| Scheme Specific | 66.08 | 66.56 |
| **2006**  |  |  |
| Common  | 81.17 | 87.8 |
| Scheme Specific  | 68.16 | 96.10 |
| **2006 modified** |  |  |
| Common | 89.25 | 92.66 |
| Scheme Specific  | 0.00 | 80.73 |
| **2015**  |  |  |
| Common | 98.65 | 98.54 |
| Scheme Specific  | 93.50 | 97.34 |
| **2015 modified** |  |  |
| Common | 100.00 | 100 |
| Scheme Specific  | 0.00 | 57.14 |

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