Appendix 2

Cambridgeshire Pension Fund - Data Improvement Plan – large scale rectification projects

No.	Area of Improvement	Action	Risk	Effect on TPR data scoring	Number of affected records	Method of resolution	Resolution timescale	Resource required
1	**Status 8s (awaiting entry)**	Ensure all status 8 members are genuinely awaiting entry.	Members on an incorrect status have the potential to be missed for appropriate processing and reporting.	All members not showing the correct membership status are a common data fail.	761	Records must be converted to the appropriate membership status by processing the correct benefit calculation. Every record will need looking at very closely using information contained within the member's documents to create the record.	January 2019 – March 2020.	Pensions Officers within the Governance and Regulation Team.
2	**Status 2s (undecided leavers)**	Process non BAU status 2 records.	Status 2 should only be used as a temporary status and benefits should be processed as either a refund, frozen refund, deferred or aggregated. Members on this status have the potential to be missed for appropriate processing and reporting.	All members not showing the correct membership status are a common data fail.	5,438	Refer to action plan.	Refer to action plan.	Refer to action plan.
3	**Contracted-out liabilities**	Conduct the contracted-out reconciliation comparing liabilities held on scheme records compared with that held by HMRC as HMRC will not make any amendments to liability ownership after 31/12/2018.	This is an exercise instigated by HMRC as a result of the introduction of the flat rate state pension on 06/04/2016. All UK pension schemes must undertake the reconciliation stage of this exercise by 31/12/2018. After this date, HMRC will not respond to queries or amend their records. Failure to hold the correct contracted-out liability for individual scheme members could result incorrect benefit payments paid from the Fund.	Any records with missing or incorrect contracted-out liabilities will be a scheme-specific data fail.	Exact numbers of records with incorrect liability will be known at the end of the reconciliation stage (31/12/2018).	Reconciliation has been outsourced to ITM Limited and due to complete on 31/12/2018. Rectification will be conducted by LGSS Pensions wef 01/01/2019.	Rectification stage to commence 01/01/2019 but end date unknown until the quantity of affected members is known (31/12/2018).	Pensions Officers within the Governance and Regulation Team.

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4	**Pensions Increase errors**	Resolve the inaccurate application of Pensions Increase errors resulting from inaccurate migration of pensioner payroll data, and specifically the duplication of particular payroll elements and pension types.	Failure to fully address pensions increase errors can, in the medium to long term create large over or underpayments of a member's pension. It should be noted that the financial impact on scheme members will be very small.	An incorrect value of the cumulative increases to a member's pension is a scheme-specific data fail.	609 records affecting 352 individual members.	Both pensions administration and pensions payroll records need to be amended to ensure cumulative increases are correctly displayed and the appropriate pension types are used to ensure future correct application of pensions increase. Over and underpayments of pensions will need thoroughly addressing in line with established procedures.	1 December 2018 – 28 February 2019.	Pensions Officers within the Governance and Regulation Team.
5	**Altair Payroll vs Altair Administration variances (pre-payroll migration)**	Resolve variances in the amount of pension in payment on the payroll and that held on the administration record.	Failure to address variances can in the medium to long term, create large over or underpayments of a member's pension.	An incorrect value of a current rate of pension on the administration system is a scheme-specific data fail.	From the pre-pensioner payroll migration data cut of 2016/17 the following remain outstanding (as at 24/09/2018): Underpayments = 35 Overpayments = 146	Establish the correct rate of pension that should be in payment and amend the administration and payroll records accordingly. Any under or overpayments should be thoroughly addressed in line with established procedures.	January 2018 – March 2019.	Pensions Officers within the Governance and Regulation Team.
6	**Member addresses**	Ensure all membership records for all membership statuses where a liability is held by the Fund has a current home address or is marked as gone away where attempts to trace the member have been unsuccessful.	Using a previous or incorrect address to communicate with a member can potentially result in a breach of personal data. Members may also not receive important communications prompting them to take action with regards to their present or future entitlement which may have an adverse financial impact.	Not holding a current home address for a scheme member will be a common data fail.	6,431	Procure a member tracing service to reference scheme membership against central registers to obtain current home addresses.	Procurement process to begin as soon as the National LGPS Framework for member tracing services becomes live. Anticipated September 2018. Time frame for completion of exercise to be confirmed once procurement process has been completed but this will be a priority project. Some pre-exercise data cleansing may be required.	Pensions Officers within the Governance and Regulation Team with support from the Systems Team if required.

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7	**Common data fails identified in the 2018 Data Audit (not covered in 1-6 above)**	Resolve all common data fails.	Inaccurate common data can potentially result in a breach of personal data. Members may also not receive important communications prompting them to take action with regards to their present or future entitlement which may have an adverse financial impact. Inaccurate common data can also lead to a miscalculation of individual pension liabilities which could put the scheme employer and the Fund in an adverse position.	Unresolved data fails will reappear in next year's Data Audit and will be requoted in the following year's data score submitted to the Pensions Regulator via the statutory annual return. Failure to rectify data fails will not demonstrate to the Pensions Regulator that the Fund has an effective Data Improvement Plan in place that is being adhered too in line with the Code of Practice.	Missing/temporary of invalid national insurance number – 644. Missing or inconsistent forenames and initials – 19. Missing or inconsistent sex – 74. Missing or inconsistent date of birth – 1. Missing or inconsistent pensionable service start date – 773 (of which 618 are awaiting entry).	Correct data held by reviewing member's documents and/or contacting member for confirmation.	January 2019 – March 2019.	Pensions Officers within the Governance and Regulation Team.
8	**Scheme specific data fails identified in the 2018 Data Audit (not covered in 1-6 above)**	Resolve all scheme specific data fails.	Inaccurate scheme-specific data can potentially result in a breach of personal data. Members may also not receive important communications prompting them to take action with regards to their present or future entitlement which may have an adverse financial impact. Inaccurate common data can also lead to a miscalculation of individual pension liabilities which could put the scheme employer and the Fund in an adverse position.	Unresolved data fails will reappear in next year's Data Audit and will be requoted in the following year's data score submitted to the Pensions Regulator via the statutory annual return. Failure to rectify data fails will not demonstrate to the Pensions Regulator that the Fund has an effective Data Improvement Plan in place that is being adhered too in line with the Code of Practice.	TBC	Resolution will be dependent upon the type of error and how it occurred.	January 2019 – March 2019.	Pensions Officers within the Governance and Regulation Team.