



Aquila Heywood

Local Government Pension Scheme Common Data Quality Report City and County of Swansea Pension Fund



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1 Executive Summary

1.1 Introduction

In 2015, the Pensions Regulator (TPR) assumed responsibility for Public Sector Pension Schemes. Prior to this, in June 2010, TPR issued guidance on the approach that they consider to be good practice for measuring the presence of member data. Specific targets were set for data TPR deemed as 'common' and Aquila Heywood has assisted customers in the collection and qualification of this data.

To assist customers in undertaking a practical assessment of their common data, Aquila Heywood offers a Data Quality service.

1.2 Data Quality Service

Working with the City and Country of Swansea Pension Fund (Swansea), Aquila Heywood has completed a review of Swansea's common pension data in line with the guidance notes set down by TPR. Aquila Heywood's understanding of the Local Government Pension Scheme data, benefit calculations, interfaces and processes, has assisted in the agreement of which items to test. The tests to satisfy each condition have been run and the results quantified to provide guidance on any corrective action required.

The service incorporates data items tested against the data conditions agreed with Swansea. To provide focus on the key areas of common data to be addressed, each data category is measured against an agreed benchmark.

In 2019, a set of "core" tests were identified for reporting to TPR. The results to be quoted to TPR are quoted separately from the overall test scores. For details of where the TPR tests differ from the overall tests, please refer to appendix B.

1.3 Benchmark

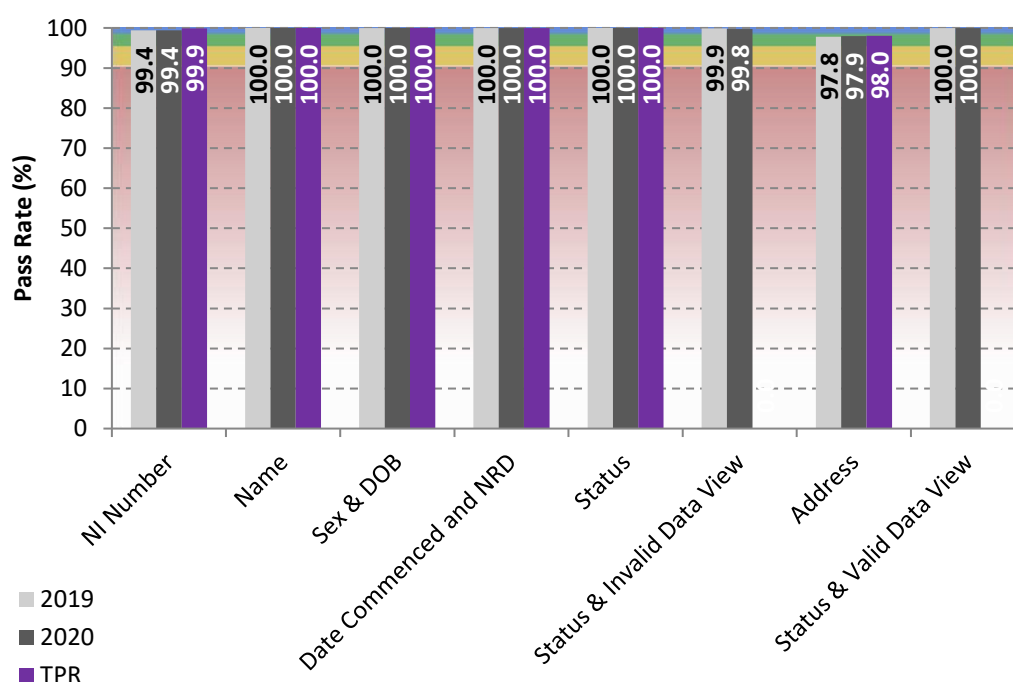
The benchmarks applied to the results presented in this report were agreed between Swansea and Aquila Heywood. The categories and thresholds are as follows:

Category	Pass Threshold
Blue	Pass rate \geq 98%
Green	95% \leq Pass rate $<$ 98%
Amber	90% \leq Pass rate $<$ 95%
Red	Pass rate $<$ 90%

These benchmarks are illustrated in the background of the results graphs. TPR have set targets of 100% accuracy for data created after June 2010 and 95% accuracy for data created beforehand. The Aquila Heywood data quality service measures data as a whole as updates for many members are continuous and alter the last updated date on the system.

1.4 Summary of Common Data Results

The graph below indicates Swansea's performance for each data category against the agreed scheme benchmarks together with the results from the 2019 tests. The results presented herein are generated from data extracted from Swansea's Live Altair service on 4th June 2020 for all tests. The 2019 tests were generated from data extracted on 5th June 2019. The overall percentage of tests passed for Swansea's common data is **99.6%** which the same score as in 2019. The 2020 tests were conducted on 75,833 member records, an increase of 3,463 on 2019.

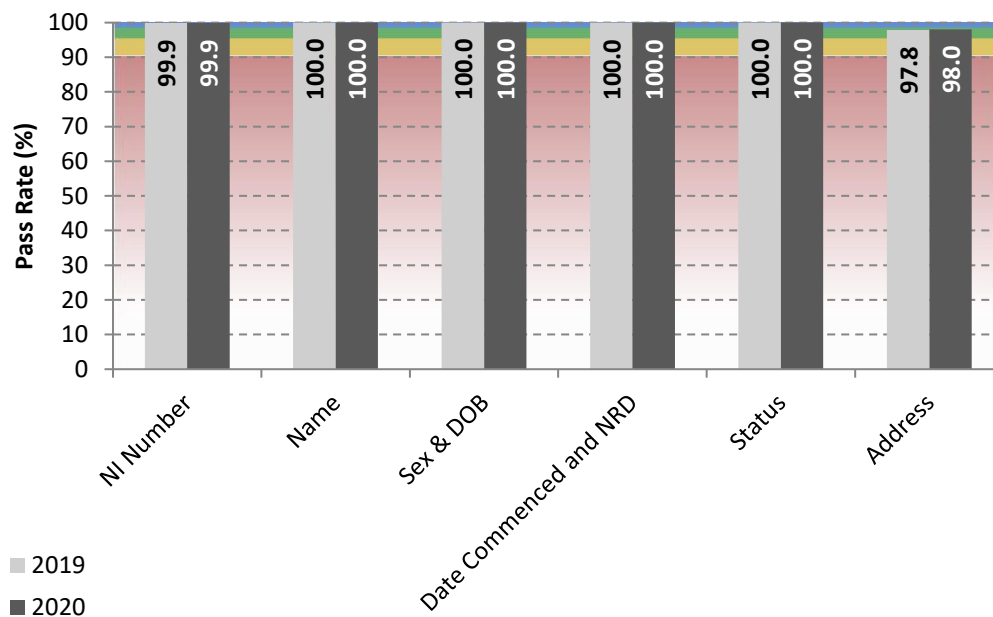


Seven of the eight categories met the highest benchmark of greater than 98% with three categories not recording a single failure. A further two categories have been rounded to 100% with a score of over 99.95%. The lowest scoring category concerned member **Address** that achieved a score of **97.9%** which is an improvement on the 2019 score of 97.8%. The general quality of the common data tested at Swansea is of a high standard. There is some work required to trace members recorded as "gone away" to bring this category into the highest benchmark.

The percentage of member records without a single common data failure is **97.1%**. This is the same score as in 2019.

1.5 TPR Common Data Core 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 **98.0%**. This represents a **0.2%** improvement on the 2019 score of 97.8%. This is the figure to be quoted on the scheme return to TPR. The core test scores for each category are shown below.



2 Analysis of Common Data Results

Condition	Qualifying Members		Pass Rate		Areas for Review	Comments
	Tested (change)	Passed (change)	Overall (change)	TPR (Change)		
NI Number	75833	75383	99.4%	99.9%	Fail A: 4 Fail B: 425 Fail C: 21	<p>The number of members failing a test has increased by 2 since 2019 however, due to the increase in qualifying members the pass rate has increased.</p> <p>4 members, all of which are dependents have a blank NI number. This test counts towards the TPR core results.</p> <p>There are 425 members with a temporary NI number to be addressed, 68 of which count towards the TPR core results:</p> <ul style="list-style-type: none"> - 150 leavers and 207 deceased, that may be dealt with as a lower priority and do not count for the TPR results; - 6 are deferred pensioners; - 22 are adult dependents; - 5 members are awaiting entry; - 3 are optant outs; - 32 are frozen refund cases which may affect CEP payments; <p>A further 21 members have an NI number with an incorrect format, 8 of which are leavers and 6 are deceased members. There is also 1 adult dependent, 1 deferred, 1 pensioner and 4 frozen refunds. This test does not count towards the TPR core results.</p>
<u>Eligible for Testing:</u>	(+3463)	(+3461)	(+0.03%)	(+0%)		
All members						

Condition	Qualifying Members		Pass Rate		Areas for Review	Comments
	Tested (change)	Passed (change)	Overall (change)	TPR (Change)		
Name <u>Eligible for Testing:</u> All members	75833 (+3463)	75833 (+3463)	100% (0%)	100% (0%)	Fail A: 0 Fail B: 0 Fail C: 0	All member records have valid name fields recorded for the third consecutive year.
Sex and Date of Birth <u>Eligible for Testing:</u> All members (Leavers and deaths excluded from test D)	75833 (+3463)	75833 (+3464)	100% (+0%)	100% (+0%)	Fail A: 0 Fail B: 0 Fail C: 0 Fail D: 0	All member records have a valid sex and date of birth recorded. 1 member failed a test in 2019.
Date commenced and NRD <u>Eligible for Testing:</u> All members	75833 (+3463)	75825 (+3458)	100% (0%)	100% (0%)	Fail A: 7 Fail B: 1	5 leavers and 2 awaiting entry members do not have a date joined fund. This test counts towards the TPR core results. 1 awaiting entry member has an invalid date joined fund There were 3 failures in 2019.
Status <u>Eligible for Testing:</u> All members	75833 (+3463)	75833 (+3463)	100% (0%)	100% (0%)	Fail A: 0 Fail B: 0 Fail C: 0	All member records have a valid and consistent status recorded for the third consecutive year.

Condition	Qualifying Members		Pass Rate		Areas for Review	Comments
	Tested (change)	Passed (change)	Overall (change)	TPR (Change)		
Status and invalid data view <u>Eligible for Testing:</u> All members	75833 (+3463)	75651 (+3352)	99.8% (-0.14%)	N/A	Fail A: 30 Fail B: 93 Fail C: 30 Fail D: 33	<p>The number of members failing a test has increased by 111 resulting in a 0.14% decrease in the pass rate. This category is excluded from the TPR core results.</p> <p>30 members have an 'Exit' data view which is not in line with their status history. 93 members have an unexpected 'deferred' data view having never been deferred on their status history. 30 members have an unexpected 'pensions' data view and 33 members have a 'dependents' data view which is not in line with their status history. All tests have seen an increase in fails.</p> <p>182 members have data views that are not expected for their status history:</p> <ul style="list-style-type: none"> - 16 leavers and 102 deceased, that may be dealt with as a lower priority; - 16 are active members and 8 are undecided leavers; - 8 are deferred pensioners; - 2 are pensioners; - 1 is a dependent; - 7 are for aggregated records; - 3 are for optants out and 19 are awaiting entry, who would not be expected to have any data of this kind. <p>4 members have more than 1 unexpected data views. Fails in this category should be investigated to ensure correct benefits are calculated as a priority.</p>

Condition	Qualifying Members		Pass Rate		Areas for Review	Comments
	Tested (change)	Passed (change)	Overall (change)	TPR (Change)		
Address <u>Eligible for Testing:</u> All members except leavers and deaths (status 3 and 7)	75833 (+3463)	74268 (+3507)	97.9% (+0.16%)	98% (+0.19%)	Fail A: 344 Fail B: 43 Fail C: 1099 Fail D: 13 Fail E: 70	<p>There has been a 0.16% improvement in the pass rate in this category due to 44 fewer members with address errors.</p> <p>344 members have no address recorded and 43 members have an address record but the 1st line is blank.</p> <p>1099 members are recorded as “gone away”. 13 members have no Postcode recorded.</p> <p>A further 70 postcodes are in an incorrect format. This test does not count towards the TPR core results. Of the 83 members either missing or holding an invalid postcode, 4 are also recorded as “gone away”.</p> <p>Some of the remaining members may be overseas without having the overseas indicator set.</p>

Condition	Qualifying Members		Pass Rate		Areas for Review	Comments
	Tested (change)	Passed (change)	Overall (change)	TPR (Change)		
Status and valid data view <u>Eligible for Testing:</u> Members with deferred benefits or benefits in payment (Status 4, 5, 6, 7, 9 and T)	75833 (+3463)	75819 (+3455)	100% (-0.01%)	N/A	Fail A: 9 Fail B: 0 Fail C: 0 Fail D: 2 Fail E: 2 Fail F: 1	<p>The number of members failing tests has increased from 6 to 14, resulting in a 0.01% decrease in the pass rate. This category is excluded from the TPR core results.</p> <p>9 deferred members are missing the deferred details data view and should be investigated immediately as no benefits are held for these members. There were no failures for this test in 2019.</p> <p>2 deceased cases from active or deferred status are missing exit details where death grant details are recorded. 1 member was active and 1 was deferred pensioner.</p> <p>2 deceased members who were pensioners do not have a date recorded for when the pension ceased. Similarly, 1 deceased dependent is missing a cease date.</p>

3 Data Correction Plan

The table below provides Swansea with suggestions for resolving the issues identified. This table is deliberately high-level as the detail and dates should be agreed once the results have been thoroughly reviewed. This table represents a summary of the recommended actions outlined in Section 2.

Data Category	Recommendation	Suggested Priority
NI Number	<ul style="list-style-type: none"> Obtain NI Numbers for the 4 adult dependants Obtain correct NI numbers for the members with temporary numbers or those in the incorrect format 	<ul style="list-style-type: none"> VERY HIGH Low
Name	<ul style="list-style-type: none"> No issues found 	
Sex and Date of Birth	<ul style="list-style-type: none"> No issues found 	
Date commenced and NRD	<ul style="list-style-type: none"> Obtain correct commencement dates for the 5 leavers and 3 awaiting entry 	<ul style="list-style-type: none"> Low
Status	<ul style="list-style-type: none"> No issues found 	
Status and invalid data view	<ul style="list-style-type: none"> Invalid data should be removed where necessary or the member status history corrected where appropriate. These cases should be treated as a high priority where the member is not a leaver or deceased as the presence of the data may affect benefits 	<ul style="list-style-type: none"> High
Address	<ul style="list-style-type: none"> Current addresses should be sought and uploaded for the members that failed this category 	<ul style="list-style-type: none"> Medium

Data Category	Recommendation	Suggested Priority
Status and valid data view	<ul style="list-style-type: none"> • The 9 deferred members missing a deferred details data view should be investigated and corrected • The 2 deaths from active and deferred status may be missing death grant data and should be investigated • The 3 pensioner and dependant deaths with missing cease dates should be investigated and corrected 	<ul style="list-style-type: none"> • VERY HIGH • Low • Low

4 Appendices

4.1 Appendix A – TPR Guidance

Data Field	TPR Comment
National Insurance Number	'TN' formats should be regarded as missing data. The final character of NI numbers is not essential.
Surname	Check that surname is present.
Forename(s) or initials	Forenames are preferable but initials are an acceptable alternative.
Sex	Check that sex is present.
Date of birth	Check that date of birth is present and consistent (earlier than date joined scheme, retirement, date of leaving). False dates should be classed as missing data.
Date pensionable service started/policy start date/first contribution date	For trust-based schemes this will be date pensionable service started. For contract-based schemes this will effective start date of the policy or the first contribution date, depending on the provider's requirements.
Expected retirement/maturity date (target retirement age)	This field may be derived or explicit; for most DB schemes it will probably be derived as the scheme's normal retirement date. Need to check that it is populated if that is a scheme/system requirement, that it is consistent with scheme rules and statutory requirements, and is later than date of birth and pensionable service date/first contribution date.
Membership status	Check that a current valid status is recorded for each member. This may be a dual status, eg active or deferred member with partial retirement. For contract-based schemes this may be 'active' or 'inactive'.
Last status event	Check that benefits taken are consistent with status, and, if status history is recorded, that the latest status is the same as the explicitly recorded current status.

Data Field	TPR Comment
Address	An address should be present for all members of all schemes. Because of DPA requirements an exception is permissible for active members of those trust-based schemes in which communication with members is normally sent via the employer. 'Gone away', 'unknown' or similar should be treated as missing data.
Postcode	Check that a postcode is present if address is not identifiable as being overseas. Will assist with valuations for actives, for whom storing full address may breach DPA principles.

4.2 Appendix B – Common Data and Fail Criteria

Common Data

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
NI Number <u>Eligible for Testing:</u> All members	NI Number (NI-NUMBER) is blank	NI number is temporary (commences TN) and is not a child pension (DEPND-TYPE = 'C') Leavers (3) and deaths (7) are excluded from the TPR results	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) Test is excluded from the TPR results			
Tested: 75833	Failed: 4	Failed: 425	Failed: 21			

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Name <u>Eligible for Testing:</u> All members	Surname (SURNAME) is blank	Forenames (FORENAMES) is blank	Initials (INITIALS) is blank Test is excluded from the TPR results			
Tested: 75833	Failed: 0	Failed: 0	Failed: 0			
Sex and Date of Birth <u>Eligible for Testing:</u> All members *	Sex (SEX) is blank	Sex is not Male or Female	Date of Birth (DOB) is blank	Date of Birth is earlier than or equal to 01/01/1900 (* Leavers and deaths excluded from this test) (Status 3 and 7)		
Tested: 75833	Failed: 0	Failed: 0	Failed: 0	Failed: 0		
Date commenced and NRD <u>Eligible for Testing:</u> All members	Date Joined fund (DJF) is blank	Date Joined Fund is earlier than Date of Birth plus 15 years Test is excluded from the TPR results	NRD checks are not required as these are always calculated			
Tested: 75833	Failed: 7	Failed: 1				

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Status <u>Eligible for Testing:</u> All members	Status (STATUSKEYF) is blank	Status is not 1-9, T or O	Status on member summary (STATUSKEYF) does not match that on basic details (STATUS[1]) Test is excluded from the TPR results			
Tested: 75833	Failed: 0	Failed: 0	Failed: 0			
Status and invalid data view <u>Eligible for Testing:</u> All members Category is excluded from the TPR results	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	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	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	Dependant details should not be present unless status is 6 or a previous status is 6 and the current status is 3 or 7		
Tested: 75833	Failed: 30	Failed: 93	Failed: 30	Failed: 33		

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Address <u>Eligible for Testing:</u> All members except leavers and deaths (status 3 and 7)	Address record does not exist	Address record exists, but line 1 (ADD-LINE-1) is blank	Gone Away (ADD-GONAWY) indicator is set	If the address is not overseas, the Postcode (POSTCODE) is blank	If the address is not overseas, the Postcode is not the correct format (1 st letter =Q, V or X, 2 nd letter is I, J or Z, 3 rd , 4 th or 5 th character is not a space) Test is excluded from the TPR results	
Tested: 75833	Failed: 344	Failed: 43	Failed: 1099	Failed: 13	Failed: 70	
Status and valid data view <u>Eligible for Testing:</u> Members with deferred benefits or benefits in payment (Status 4, 5, 6, 7, 9 and T) Category is excluded from the TPR results	Status 4 does not have deferred details	Status 5 or T do not have pension details	Status 6 does not have dependant details	Status 7 or 9, with a previous status of 1 or 4 do not have exit details	Status 7 with a previous status of 5 should have a relevant date pension ceased	Status 7 with a previous status of 6 should have a relevant date pension ceased
Tested: 75833	Failed: 9	Failed: 0	Failed: 0	Failed: 2	Failed: 2	Failed: 1

