



Aquila Heywood

# Local Government Pension Scheme Scheme-specific Data Quality Report The City and County of Swansea Council



June 2018

# Table of Contents

<b>1</b>	<b>Executive Summary</b>	<b>3</b>
1.1	Introduction	3
1.2	Data Quality Service	3
1.3	Benchmark	4
1.4	Summary of Scheme-specific Data Results	4
1.4.1	Member Benefits Data	5
1.4.2	Other Member Data	5
1.4.3	CARE Benefits	5
1.4.4	HMRC	6
1.4.5	Contracting Out	6
1.5	Other Information	6
<b>2</b>	<b>Scheme-specific Data Results</b>	<b>8</b>
2.1	Member Benefits Data Category	8
2.1.1	Results	8
2.1.2	Analysis of Results	9
2.2	Other Member Data Category	13
2.2.1	Data Results	13
2.2.2	Analysis of Results	14
2.3	CARE Benefits	16
2.3.1	Data Results	16
2.3.2	Analysis of Results	17
2.4	HMRC	18
2.4.1	Data Results	18
2.4.2	Analysis of Results	19
2.5	Contracting Out	21
2.5.1	Data Results	21
2.5.2	Analysis of Results	22
<b>3</b>	<b>Data Correction Plan</b>	<b>23</b>
<b>4</b>	<b>Appendices</b>	<b>26</b>
4.1	Appendix A – TPR Guidance (In-Scope Tests)	26
4.2	Appendix B – Benefit Crystallisation Events (In-Scope)	30
4.3	Appendix C – Conditions and Fail Criteria	31

# 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. TPR also outlined 'scheme-specific' (conditional) data but did not set prescriptive targets as the data is deemed to be scheme-specific. The guidance did target Pension Scheme Trustees to ensure that 'reasonable endeavours' were undertaken to provide evidence of assessment and measurement, together with an action plan to meet the scheme specific targets.

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

## 1.2 Data Quality Service

Working with Swansea Council (Swansea), Aquila Heywood has completed a review of Swansea's scheme-specific pension data in line with the guidance notes set down by TPR detailed in appendix A. 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 following terms should be understood to aid understanding of the conditions used and the results obtained:

- **Data condition** – identified TPR condition, for example check that an active member does not have a date of leaving
- **Data category** – grouping of relevant data conditions, for example **Member Benefits** (see section 1.4 below)
- **Data item** – item of data which forms part of a data condition for example 'date of leaving'

The service incorporates in the order of 100 individual tests against the data conditions agreed with Swansea. To provide focus on the key areas of scheme-specific data to be addressed, each data category is measured against an agreed benchmark.

## 1.3 Benchmark

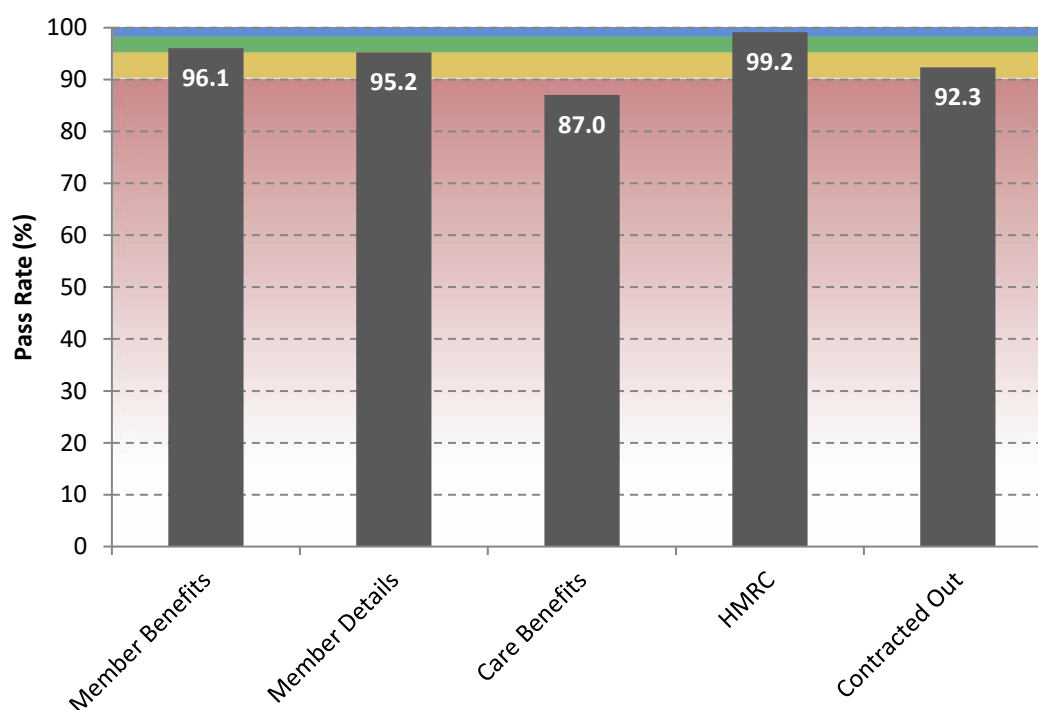
The benchmarks applied to the results presented in this report were agreed between Swansea and Aquila Heywood. The categories and thresholds are as follows:

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 benchmark ranges are illustrated in the background of subsequent results graphs.

## 1.4 Summary of Scheme-specific Data Results

The graph below indicates Swansea's performance for each data category against the agreed scheme benchmarks. Also, below is an explanation as to the data conditions relevant to each data category. The results presented herein are generated from data extracted from Swansea's Live Altair service on 8<sup>th</sup> June 2018 for all tests. The overall percentage of tests passed for Swansea's scheme-specific data is **94.9%**. The percentage of member records without a single scheme-specific data failure is **72.1%** and this is the figure that TPR will be requesting on the scheme return.



### 1.4.1 Member Benefits Data

This category includes those data conditions for members that directly relate to the details of benefits in payment or to the calculation of benefits yet to be paid.

A total number of 31,797 members qualified for one or more checks as part of the in-scope conditions under this category. Swansea set a minimum 90% benchmark target and achieved a **96.1%** pass rate, placing it in the green benchmark. The detailed analysis of each condition is in Section 2.1, but 7 of the 10 Data Conditions specified attained the highest benchmark category (Blue, >98%) with a further condition only 0.1% short. The lowest scoring condition was **Transfer In Details 1**, where only **54.1%** of members tested passed, almost entirely as a result of incorrectly recorded historical manual cases. Although many of the cases that failed this condition may not directly affect benefits being paid to members, these cases should be investigated to ensure service credits are correctly recorded.

### 1.4.2 Other Member Data

This category includes those data items that may be used in the calculation of member benefits.

A total number of 45,244 members qualified for one or more checks as part of the in-scope conditions under this category. Swansea set a minimum 90% benchmark target and achieved a **95.2%** pass rate, equalling the Green benchmark. The detailed analysis of each condition is in Section 2.2 but 6 of 7 individual scores attained the highest benchmark category (Blue, >98%). The lowest score was on the **Contributions** condition, where **95.2%** of members passed. Most failures in this condition were a result of data missing in the rolled up total. This can be corrected by running a bulk calculation where contributions are present. Many of the failures in this category appear to be caused by data not being present for the most recent year.

### 1.4.3 CARE Benefits

This category includes those data items required to calculate Career Average Revalued Earning (CARE) benefits.

A total number of 25,937 members qualified for the checks as part of the in-scope conditions under this category. Swansea set a 90% minimum benchmark target and achieved a **87.0%** pass rate, placing CARE benefits in the red category. Most of these failures are missing the most recent entry suggesting that the data has yet to be received. This data should be requested as soon as possible as Annual Benefit Statements cannot be supplied without it.

As CARE revaluation is calculated for each member from a single factor table, the table itself is checked for a complete list of factors and was given a 100% pass. The detailed analysis of the conditions is in Section 2.3. Fails in this category directly affect the calculation of member benefits and so should be resolved as a priority.

#### 1.4.4 HMRC

This category includes those values recorded as a result of the Finance Act 2004 as well as Pre A-Day limits.

A total number of 50,867 members qualified for one or more checks as part of the in-scope conditions under this category. The conditions within this category have been expanded for clarity and are detailed in Appendix B.

Swansea set a 90% minimum benchmark target and achieved a **99.2%** pass rate placing the category in the highest Blue category. The detailed analysis of each condition is in Section 2.4. The highest benchmark was achieved in 6 of the 7 categories. The **BCE7** category achieved an **86.1%** percent pass rate as the bulk of cases did not have a death grant recorded where one was expected.

#### 1.4.5 Contracting Out

This category includes those data items required to meet scheme contracting out conditions.

A total number of 43,594 members qualified for one or more checks as part of the in-scope conditions under this category. Swansea set a 90% minimum benchmark target and achieved an **92.3%** pass rate, placing Contracting Out in the amber category. The detailed analysis of each condition is in Section 2.5. but the highest individual score was achieved in the condition **Contracting Out**, where **99.6%** of members passed. The remaining 3 categories in **Contracting Out** were benchmarked as red. Fails in this category are likely to have an impact on GMP Reconciliation and so should be resolved either in advance, or as part of the GMP Reconciliation process.

### 1.5 Other Information

The remainder of this report is split into the following sections:

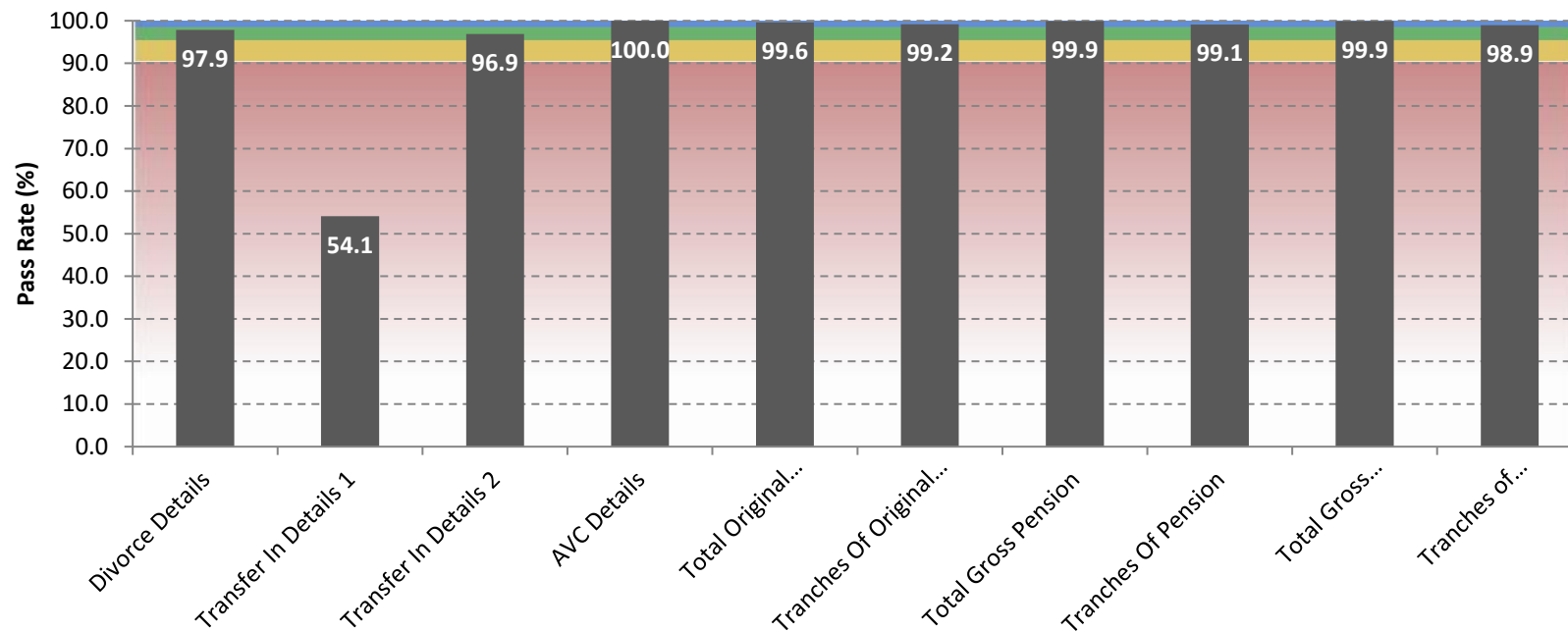
- **Scheme-specific Data Results** – results of each in-scope condition per category along with the number of members tested, main failures and suggested risks and actions
- **Appendices** – details to qualify failures against each condition, along with a list of TPR's guidance relating to the Local Government Pension Scheme

Where possible, Aquila Heywood has provided advice and suggested next actions to work with Swansea in implementing a solution to any data anomalies. This document is the start point for Swansea's data management policy and Aquila Heywood will agree with Swansea the appropriate frequency to repeat these conditions and demonstrate progress in scheme-specific data cleansing.

## 2 Scheme-specific Data Results

### 2.1 Member Benefits Data Category

#### 2.1.1 Results





### 2.1.2 Analysis of Results

Condition	Qualifying Members		Areas for Review	Comments
	Tested	Passed		
<b>Divorce Details</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T where Calculation Date (DVC-CALDTE) has a value	47	46  97.9%	Fail A: 0 Fail B: 0 Fail C: 1 Fail D: 0 Fail E: 1 Fail F: 0	1 member has a payment date that is prior to 01/12/2000. The same member has either a blank pension debit or a value of 0. This may be an incorrectly recorded earmarking order.

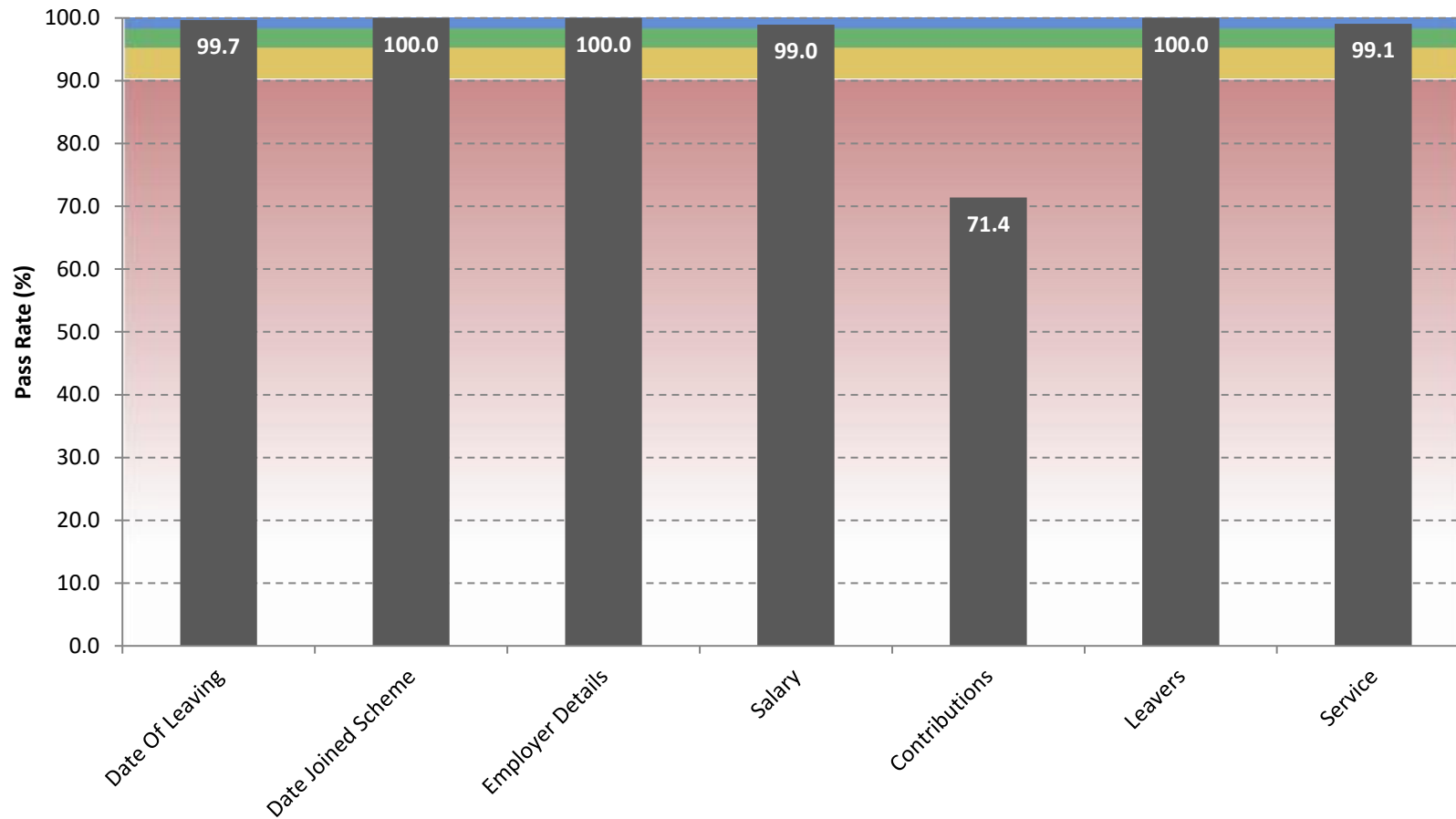
Condition	Qualifying Members		Areas for Review	Comments
	Tested	Passed		
<b>Transfer In Details 1</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T where transfer In details exist	4293	2323  54.1%	Fail A: 524 Fail B: 113 Fail C: 748 Fail D: 919 Fail E: 678 Fail F: 527	<p>678 instances concerned invalid transfer types that do not match those calculations write-back. 196 entries are blank with the rest holding incorrectly typed entries. The most frequent being the use of "INTERFUND" or other variations instead of "INTERFND" from the drop-down selection. The most recent transfer that failed this test was in 1999, so these fails are exclusively historical cases. This fault may lead to incorrect reporting but will not affect benefits for these members.</p> <p>There are also 748 failures where there is no service credit or pension credit recorded from the transfer that will require investigation, of which 470 also failed the transfer type test. The vast majority are interfunds or restitution cases that were manually input several years ago. Providing service was recorded correctly on the service history, member benefits will be correct.</p> <p>A common fail with 919 instances where there is a service credit, but no corresponding dates on the service history that should be investigated urgently.</p> <p>There were 524 fails with a missing transfer date and 113 with missing transfer values that were also largely limited to manually recorded interfund transfers. 527 cases had a transfer date that was earlier than date joined fund. Again, providing service was recorded correctly on the service history, member benefits will be correct.</p> <p>Incorrect data may result in incorrect benefit calculations</p>
<b>Transfer In Details 2</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T where transfer In details exist	4293	4158  96.9%	Fail A: 147	147 transfer records across 135 members are missing both the name and the location number of the previous scheme

Condition	Qualifying Members		Areas for Review	Comments
	Tested	Passed		
<b>AVC Details</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T where AVC details exist	3197	3196  100%	Fail A: 1 Fail B: 1 Fail C: 0 Fail D: 0	1 member is missing both a start date and end date for their AVC contract. The same member has an additional pension purchase contract without an amount of pension recorded. This case should be investigated as a priority as incorrect benefits may be calculated.
<b>Total Original Deferred Benefit</b>  <u>Eligible for Testing:</u> Status 4	11513	11471  99.6%	Fail A: 1 Fail B: 23 Fail C: 1 Fail D: 19 Fail E: 20 Fail F: 0	1 member failed 3 tests due to not having initial and current pension totals and also an invalid date from which pensions increase is calculated.  23 members have a value in initial pension that is less than £1 of which 19 members also had a small current pension.  20 members have an invalid date from which pensions increase is calculated including the member mentioned above.
<b>Tranches of Original Deferred Benefit</b>  <u>Eligible for Testing:</u> Status 4	11513	11420  99.2%	Fail A: 24 Fail B: 4 Fail C: 50 Fail D: 34 Fail E: 0 Fail F: 9	4 members have a total initial pension that does not equal the total of the protected, unprotected and tapered pensions. 9 members with pre-08 service do not have a scheme lump sum recorded. 50 failed with missing or small 60ths pension amounts, 34 with missing or small CARE pension amounts of which 9 also failed the 60ths pension test. 24 members failed with a missing or small PEN tranche which is a mandatory amount. These cases should be investigated ahead of producing deferred ABS.
<b>Total Gross Pension</b>  <u>Eligible for Testing:</u> Status 5 & T	11065	11057  99.9%	Fail A: 4 Fail B: 3 Fail C: 0 Fail D: 3 Fail E: 1	3 members had values less than £1 in both initial and current pension total  Additionally, there are 4 members missing the initial pension and for 1 member, the date from which PI is calculated is either missing or earlier than date joined fund.

Condition	Qualifying Members		Areas for Review	Comments
	Tested	Passed		
<b>Tranches of Pension</b>  <u>Eligible for Testing:</u> Status 5& T	11065	10966  99.1%	Fail A: 5 Fail B: 0 Fail C: 0 Fail D: 5 Fail E: 89	89 members have a last PI date earlier than the latest year processed by Swansea.  5 members have 50/50 benefits recorded but have no CP50 tranche or one with a very small value. A further 5 members have either a missing PEN tranche or one with very low value and this is a mandatory tranche.
<b>Total Gross Dependant Pension</b>  <u>Eligible for Testing:</u> Status 6	1682	1680  99.9%	Fail A: 1 Fail B: 0 Fail C: 0 Fail D: 0 Fail E: 1	1 member is missing the total initial pension  A further member is missing the date from which PI is calculated.
<b>Tranches of Dependant Pension</b>  <u>Eligible for Testing:</u> Status 6	1682	1664  98.9%	Fail A: 0 Fail B: 18	18 members have a last PI date earlier than the latest date processed by Swansea and should be investigated as a high priority to ensure correct benefits are in payment.

## 2.2 Other Member Data Category

### 2.2.1 Data Results



## 2.2.2 Analysis of Results

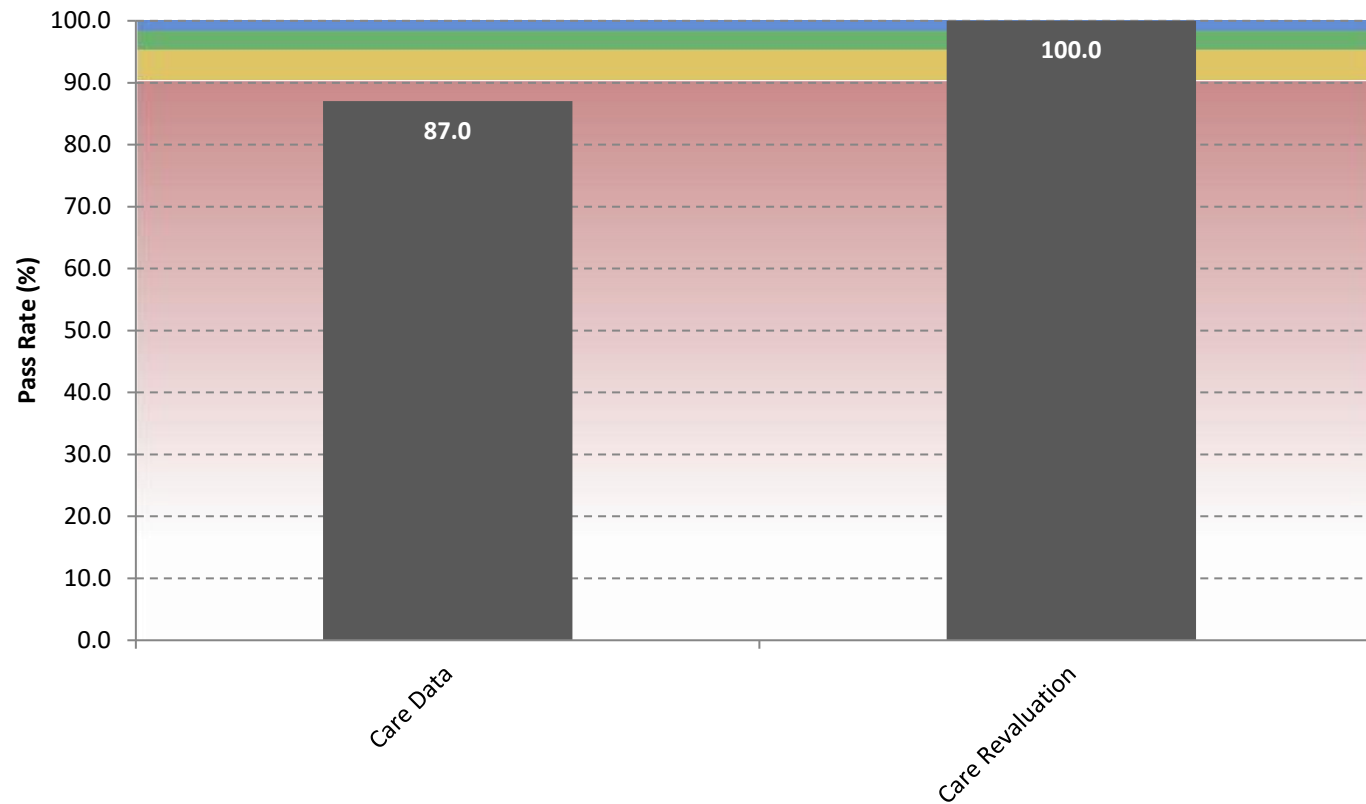
Pension Credit members are excluded from tests in this category.

Condition	Qualifying Members		Areas for Review	Comments
	Tested	Passed		
<b>Date of Leaving</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	45244	45098  99.7%	Fail A: 2 Fail B: 0 Fail C: 1 Fail D: 143	2 members have an invalid or missing date of leaving. 1 member has a date of leaving earlier than their date joined fund and this should be investigated as their benefits may be incorrect. 143 members are currently in active employment but have a date left without a previous status 4 or 9.
<b>Date Joined Scheme</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	45244	45243  100%	Fail A: 1 Fail B: 0	1 member is missing their date commenced pensionable service. This should be investigated immediately as it can affect benefits paid.
<b>Employer Details</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	45244	45243  100%	Fail A: 0 Fail B: 1 Fail C: 0 Fail D: 0	1 member has a date joined employer that is blank or earlier than 01/01/1900.
<b>Salary (Final Salary members)</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	43230	42778  99%	Fail A: 187 Fail B: 0 Fail C: 196 Fail D: 3 Fail E: 6 Fail F: 351	Of the 743 failures in this condition, a proportion of members failed on more than one test. 351 members have a latest salary recorded that was earlier than the latest bulk update by Swansea and should be investigated to determine if they are still active members. Members with final salary service without a pay recorded annual benefit statements cannot be processed and therefore investigation should be made to ensure no members are affected in this way. 196 members either have no pay entries at all (test A), or have a blank pay as their latest entry (test C). 6 pensioners have a blank or small pensionable pay amount on their pension details. Similarly, 3 members have a blank or small deferred pensionable pay value on their deferred details.

Condition	Qualifying Members		Areas for Review	Comments
	Tested	Passed		
<b>Contributions</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	45244	32307  71.4%	Fail A: 12743 Fail B: 752	12743 are missing the rolled up contribution total. The bulk contribution totalling calculation will populate the rolled up contribution total for the bulk of the fails in this condition. 752 members do not have a contribution posting for the latest bulk update by Swansea and these should be investigated to determine if they are still active members. These employers should be reminded of the importance of supplying data to the administering authority and the data requested as soon as possible. Most of those failing the second test also failed the first.
<b>Leavers</b>  <u>Eligible for Testing:</u> Status 4, 5, 9 & T	24239	24235  100%	Fail A: 4 Fail B: 0 Fail C: 0	4 members are missing, or have an invalid date left, where one should be present. These should be investigated as a matter of priority as benefits can't be calculated correctly without this information. Swansea should look to prioritise the 1 pensioner affected initially followed by the 2 deferred members and finally the frozen refund.
<b>Service</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	45244	44829  99.1%	Fail A: 415	There are 415 members who have service dates indicating a historical change, but there is no service history to detail the change. 389 of these members are pensioners. As this may affect the benefits for these members, these faults should be corrected as a priority

## 2.3 CARE Benefits

### 2.3.1 Data Results



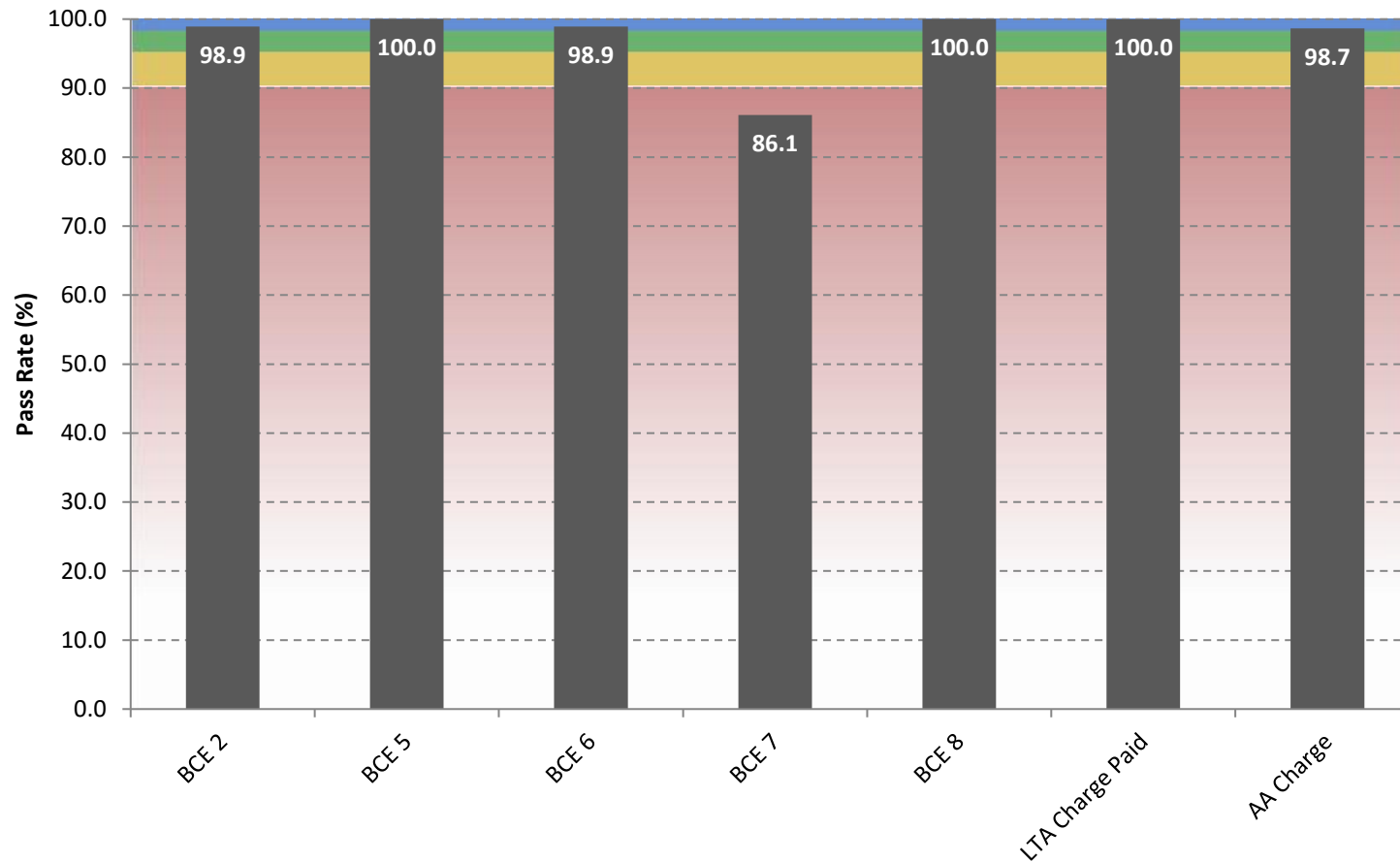


### 2.3.2 Analysis of Results

Condition	Qualifying Members		Areas for Review	Comments
	Tested	Passed		
<b>CARE data</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	25937	22569  87%	Fail A: 331 Fail B: 3165 Fail C: 2788	<p>There are 331 members without CARE data where some is expected. A few of these members are frozen refund cases that will only require the CARE data if they choose to transfer. 3165 members appear to be missing at least one year-end entry of CARE data with most of these cases missing the most recent year. Some other members failing this test joined the fund in March and may not have been received payment in the scheme year of entry, but these cases represent a small proportion of the failed tests. 2788 members have a contribution entry recorded for a year in which there are no CARE benefits recorded.</p> <p>This data is crucial to the calculation of member benefits and the employers with missing data should be reminded of the importance of providing this data as soon as possible. Annual Benefits Statements cannot be processed without this information.</p>
<b>CARE Revaluation</b>  <u>Eligible for Testing:</u> Revaluation Factor Table				The revaluation table is present and correct

## 2.4 HMRC

### 2.4.1 Data Results



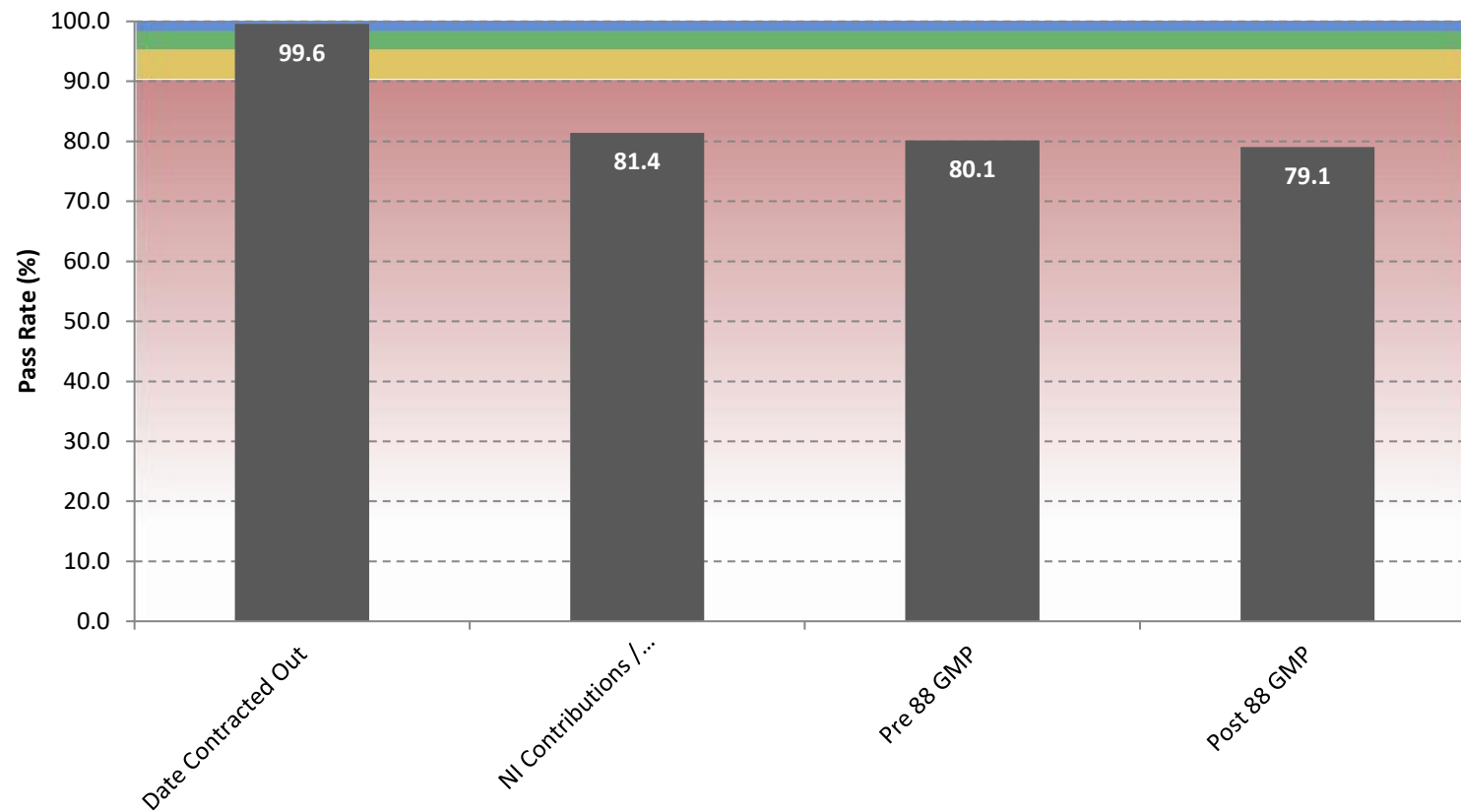
## 2.4.2 Analysis of Results

Condition	Qualifying Members		Areas for Review	Comments
	Tested	Passed		
<b>BCE 2</b> <u>Eligible for Testing:</u> Status 5 & T where Date Retired > 6/4/2006	6510	6441 98.9%	Fail A: 69 Fail B: 0 Fail C: 0	69 members have a crystallisation date that is either invalid or earlier than the date of leaving
<b>BCE 5</b> <u>Eligible for Testing:</u> Status 4 & T	11523	11523 100%	Fail A: 0	All members tested passed all tests in this condition.
<b>BCE 6</b> <u>Eligible for Testing:</u> Status 5 & T members where Date Retired > 6/4/2006 and Age at Date Retired < 75	6507	6436 98.9%	Fail A: 69 Fail B: 2 Fail C: 0	69 members have a crystallisation date that is either invalid or earlier than the date of leaving. 2 members do not have a PCLS recorded despite having a lump sum on the pension details. The reasons for this should be investigated prior to looking at methods for populating the data
<b>BCE 7</b> <u>Eligible for Testing:</u> Status 7 members where Date of Death (from Exit Details) is after 6/4/06 and within 5 years of Date Retired	180	155 86.1%	Fail A: 24 Fail B: 1	24 members have a death grant of 0 where a value was expected. The reasons for this should be investigated prior to looking at methods for populating the data. 1 member has a total death grant value but at least one of the crystallised value and percentage at the date of death is blank or 0.
<b>BCE 8</b> <u>Eligible for Testing:</u> Status 3 members where Date Left is > 6/4/2006 and there is a value in QROPS Transfer Date	5	5 100%	Fail A: 0 Fail B: 0 Fail C: 0 Fail D: 0	All members tested passed all tests in this condition.

Condition	Qualifying Members		Areas for Review	Comments
	Tested	Passed		
<b>Lifetime Allowance Charge Paid</b>  <u>Eligible for Testing:</u> Status 5 & T where Date Retired is after 6/4/2006  (ignoring members where Date, Amount & Indicator) are ticked in either Enhanced Protection or Payment of PCLS Reportable Events (Reportable Events 1 & 2 on Crystallisation screen)	6505	6503  100%	Fail A: 2	There are 2 members that exceeded the LTA that do not have a charge recorded.
<b>Annual Allowance</b>  <u>Eligible for Testing:</u> Status 1 members	19637	19375  98.7%	Fail A: 260 Fail B: 2	There are 260 members without the latest AA data recorded that was processed by Swansea.  2 members have invalid scheme pays data and should be investigated as a priority.

## 2.5 Contracting Out

### 2.5.1 Data Results



## 2.5.2 Analysis of Results

Condition	Qualifying Members		Areas for Review	Comments
	Tested	Passed		
<b>Date Contracted Out</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T members	43594	43423  99.6%	Fail A: 171 Fail B: 0 Fail C: 0	171 members have a blank DCO and joined prior to 6/4/16.
<b>NI Contributions / Earnings History</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T members where NI-Table is not E and date contracted out is on or after 6/4/78 AND before 6/4/1997	10620	8646  81.4%	Fail A: 0 Fail B: 61 Fail C: 0 Fail D: 0 Fail E: 1947	61 members do not have values that correspond with Period End Dates.  A further 1947 members have neither a full NI earnings history nor a GMP recorded (Failed both C and D simultaneously).  This data is key for correct assessment and payment of benefits.
<b>Pre 88 GMP</b>  <u>Eligible for Testing:</u> Status 4, 5 & T members where Contract Out SSPA75 is before 6/4/88	5939	4759  80.1%	Fail A: 1168 Fail B: 11 Fail C: 1	1168 members that have left with pre-1988 service are missing a GMP at exit.  11 members have a negative value once Post 88 GMP at Exit is deducted from the total GMP.  1 member has a GMP that is not divisible by 52.
<b>Post 88 GMP</b>  <u>Eligible for Testing:</u> Status 4, 5 & T members where Contract Out SSPA75 is before 6/4/97 and Date Left is after 6/5/1988	9762	7718  79.1%	Fail A: 1845 Fail B: 2043 Fail C: 1	1845 members in this category are missing a value for GMP at exit and 2043 are missing a Post 88 GMP at exit. 1 member has a post-88 GMP that is not divisible by 52.

### 3 Data Correction Plan

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

Data Category	Recommendation	Suggested Priority
<b>Member Benefits</b>	<ul style="list-style-type: none"> <li>Investigate the member with incorrect divorce values.</li> <li>Investigate incomplete Transfer In and AVC data with the very highest priority as benefits may be incorrect</li> <li>Correct deferred benefit cases prior to running deferred annual benefit statements</li> <li>Investigate defects in pension benefits that are linked to the PN60 and CARE tranche</li> <li>Investigate the 90 pensioner and dependant cases with an incorrect pension increase date</li> <li>Investigate the 11 Pensioner and Dependant cases with small pensions as a high priority</li> </ul>	<ul style="list-style-type: none"> <li>• High</li> <li>• VERY HIGH</li> <li>• High</li> <li>• High</li> <li>• VERY HIGH</li> <li>• High</li> </ul>

Data Category	Recommendation	Suggested Priority
<b>Other Member Data</b>	<ul style="list-style-type: none"> <li>• Investigate the cases with either an unexplained date of leaving present or no date at all</li> <li>• Investigate the 1 case with a missing date for when they joined the Scheme</li> <li>• Investigate the 1 member with incorrect employer details</li> <li>• Investigate final salary pay issues prior to running annual benefit statements</li> <li>• Process the contribution totalling calculation</li> <li>• Investigate cases with missing contributions prior to running annual benefit statements</li> <li>• Investigate the 4 cases where the date for leaving is either blank or incorrect</li> <li>• Investigate the 415 cases potentially missing service history starting with the 26 non-pensioners</li> <li>• End of year data for should be requested where it has yet to be supplied</li> </ul>	<ul style="list-style-type: none"> <li>• Low</li> <li>• High</li> <li>• High</li> <li>• High</li> <li>• Low</li> <li>• High</li> <li>• High</li> <li>• VERY HIGH</li> <li>• VERY HIGH</li> </ul>
<b>CARE Data</b>	<ul style="list-style-type: none"> <li>• CARE data should be requested from the employers that have yet to supply the information as soon as possible.</li> <li>• Investigate all other data issues in this category by status prior to issuing annual benefit statements for that status. Pensioners should be investigated as soon as possible to ensure correct benefits are in payment</li> </ul>	<ul style="list-style-type: none"> <li>• VERY HIGH</li> <li>• High</li> </ul>



Data Category	Recommendation	Suggested Priority
HMRC	<ul style="list-style-type: none"> <li>• Review criteria for testing HMRC data and ensure that current processes populate this data correctly in Altair</li> <li>• Investigate the 69 incorrect Crystallisation Dates</li> <li>• Investigate the 2 missing PCLS amounts</li> <li>• Investigate the 24 cases with missing death grant data</li> <li>• Investigate the 2 cases with incorrect Lifetime Allowance Charge data</li> <li>• Investigate the cases with missing Annual Allowance data, particularly the 2 scheme pays cases. This should be dealt with as soon as possible</li> </ul>	<ul style="list-style-type: none"> <li>• Medium</li> <li>• Medium</li> <li>• Medium</li> <li>• Low</li> <li>• High</li> <li>• High</li> </ul>
Contracting Out	<ul style="list-style-type: none"> <li>• Investigate cases with incorrect Date Contracted Out data</li> <li>• Investigate missing and incorrect data for NI contributions and earnings history</li> <li>• Review and update GMP values in conjunction with the GMP Reconciliation process</li> <li>• Obtain and upload GMP figures for the members with missing data as a high priority</li> </ul>	<ul style="list-style-type: none"> <li>• Medium</li> <li>• Medium</li> <li>• Medium</li> <li>• High</li> </ul>

## 4 Appendices

### 4.1 Appendix A – TPR Guidance (In-Scope Tests)

#### Member Benefits

Condition	Status Tested	TPR Guidance
Pension Sharing Details	Active, Deferred, Pensioner	If a member has had a pension sharing order, check that full details of the benefits transferred to the ex-spouse/ex-civil partner are present.
Transfer In Details	Active, Deferred, Pensioner	If benefits have been transferred in, check that all relevant details are recorded. This will include (as a minimum) the details of the previous scheme, the amount of the transfer value (split between protected rights and non protected rights and, if relevant, split between the amount received in respect of the member and employer contributions and AVCs), benefits secured, (if relevant) contracting out details.
AVC Details	Active, Deferred, Pensioner	Check that there is a history of any AVCs paid, type of investment, current provider, and (if relevant) benefits being secured
Total Original Deferred Benefit	Deferred	Check that total original deferred benefit is present (either derived or explicit).
Tranches of Original Deferred Benefit	Deferred	Check that there is a breakdown of the various tranches of the total deferred benefit. This must identify tranches with different rates of increases either in deferment or in payment, and tranches with different contingent spouse's/civil partner's benefits. Likely to include such items as pre/post 1997 splits, pre/post 2005 splits, Barber splits, VFM underpin etc. Details of the date at that any tranche is payable, if different from the scheme's normal retirement date, will also be required. The sum of the individual components must equal any total deferred pension that is recorded on the system.
Total Gross Pension	Pensioner	Check that a total pension is present (either derived or explicit).

Condition	Status Tested	TPR Guidance
Tranches of Pension	Pensioner	Check that there is a breakdown of the various tranches of the total pension, identifying tranches with different rates of increase and contingent spouse's/civil partner's benefits. The sum of the individual components must equal any total pension that is recorded on the system.

### Other Member Data

Condition	Status Tested	TPR Guidance
Date of Leaving	Deferred, Pensioner	For trust-based schemes, check that member has a date of leaving that is after date joined
Date Joined Scheme	Active, Deferred	Check that the date joined scheme is present, later than date of birth, and not earlier than date joined company. False dates should be classed as missing data.
Date joined employing company	Active, Deferred	For members of multi-employer schemes check that date joined employing company is present and is later than date of birth. False dates should be classed as missing data.
Salary	Active, Deferred	Check that there is at least one relevant salary within the last 12 months of membership.
Salary History	Active, Deferred	Check that a relevant salary exists for each of the last 5 renewal periods of membership and is greater than £1.
Contributions	Pensioner	For contributory schemes check that there is a contribution amount present for each year of active membership, or that a contribution total is present.
Date of leaving (date pensionable service ended)/ date last premium/contribution paid	Deferred, Pensioner	For trust-based schemes check that member has a date of leaving which is after date joined scheme, and that member status is not active if date of leaving is present.

## CARE Data

Condition	Status Tested	TPR Guidance
Accrued benefit details	Active, Deferred, Pensioner	Check that accrued benefit details are present if they are updated and recorded annually. If benefits are calculated from first principles when member leaves, all relevant salary & contribution will be required instead.
Revaluation percentage	Global Table	Check that there is a history of revaluation percentage for the accrued pension for each relevant year, if benefits have not been not uprated and recorded annually.

## HMRC

Condition	Status Tested	TPR Guidance
Benefit Crystallisation Event Details	Active, Deferred, Pensioner	Check that full details of the dates and amounts paid at each benefit crystallisation event, including details of LTA percentage used, are present.
Lifetime Allowance Charge Paid	Pensioner	Check that the date and amount of any lifetime allowance charge paid is present.

## Contracting Out

Condition	Status Tested	TPR Guidance
Date Contracted Out	Active, Deferred, Pensioner	Check that this is present and not earlier than 06/04/1978.
N.I. History (Contracted Out earnings & contributions)	Active, Deferred, Pensioner	Check that members have a full contracted-out history during any period contracted out on a GMP basis. A verified GMP, agreed with NISPI, would be an acceptable alternative. Not required for reduced rate females.
Pre 88 GMP	Deferred, Pensioner	Check that a member with at least one month of pre 4/88 contracted out service has a pre 88 GMP. GMP must be divisible by 52. May be derived if total GMP and post 4/88 GMP are recorded.
Post 88 GMP	Deferred, Pensioner	Check that a member with at least one month of post 4/88 service contracted out on a GMP basis has a post 88 GMP. Can be derived or explicit.

## 4.2 Appendix B – Benefit Crystallisation Events (In-Scope)

Benefit Crystallisation Event	Description
BCE2	Where a member becomes entitled to a scheme pension, whether from a defined benefits arrangement or a money purchase arrangement.
BCE5	Test the level of entitlements not taken by a member at age 75 under a defined benefits arrangement, by measure of the level of benefits that would come into payment at that time, if drawn.
BCE6	A lifetime allowance test is triggered through BCE6 whenever a member becomes entitled under a registered pension scheme to: <ul style="list-style-type: none"><li>• A pension commencement lump sum paid before age 75, when uncrystallised benefits are drawn under an arrangement</li><li>• A serious ill health lump sum paid before age 75, where the individual falls into serious ill health</li><li>• A lifetime allowance excess lump sum where a chargeable amount has been identified because the individual's lifetime allowance has been fully used up.</li></ul>
BCE7	Where a relevant lump sum death benefit is paid on the death of the member.
BCE8	Where a member's benefits or rights are transferred to a qualifying recognised overseas pension scheme.

## 4.3 Appendix C – Conditions and Fail Criteria

### Member Benefits

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>Divorce Details</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T where Calculation Date (DVC-CALDTE) has a value	Value is missing in total pension debit (DVC-TOTINI)	Value prior to 01/12/2000 is present in calculation date (DVC-CALDTE)	Value prior to 01/12/2000 is present in Payment Date (DVC-PAYDTE)	CETV (DVC-TVAMT) is blank or 0	Pension debit (DVC-CONAMT) is blank or 0	Percentage split (DVC-PCSPLT) is blank, 0 or over 100
Tested: 47	Failed: 0	Failed: 0	Failed: 1	Failed: 0	Failed: 1	Failed: 0
<b>Transfer In Details 1</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T where transfer In details exist	Date received (ADD-TV-DT) is blank or 0	Transfer Value is blank or 0 (ADD-TV)	Service (ADD-BD-CR) and transferred pension (ADD-RETP) are both blank or 0	If service (ADD-BS-CR) > 0, service history must be present. There must be a service history line that starts (HIST-START) on the same date as previous scheme from ADD-FROM)	Type (ADD-TYPE) is not valid ie CLUB, INTERFND, NON CLUB, PERSONAL, RESTITUTIO or some have INTRAFND	Date TV Received is invalid or < date joined fund (DJF)
Tested: 4293	Failed: 524	Failed: 113	Failed: 748	Failed: 919	Failed: 678	Failed: 527
<b>Transfer In Details 2</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T where transfer In details exist	Previous scheme name (ADD-PR-SCH) or employer reference (ADD-PR-EMP) must be present					
Tested: 4293	Failed: 147					

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>AVC Details</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T where AVC details exist	If AVC Details present then start date (AVC-START) must be present	If AVC Details present then contract end date (AVC-TE-DUE) must be present and equal to or later than AVC-START	If AVC Details present and type (AVC-TYPE) is A, B, G, L, P, R, S then added years (AVC-ADDY) must be greater than 0	If AVC Details present and type (AVC-TYPE) is H, M then pension (AVC-P75T) must be greater than 0 and less than or equal to the scheme maximum		
Tested: 3197	Failed: 1	Failed: 1	Failed: 0	Failed: 0		
<b>Total Original Deferred Benefit</b>  <u>Eligible for Testing:</u> Status 4	No value in Initial Pension (DEF-TOT-IP)	The value in Initial Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	No value in total current pension (DEF-TOT-CP)	The value in total current Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	PI date (DEF-INC-DT) must be present and later than date joined fund (DJF)	Last PI date (DEF-PI-DT[1]) is earlier than last PI date processed by customer
Tested: 11513	Failed: 1	Failed: 23	Failed: 1	Failed: 19	Failed: 20	Failed: 0
<b>Tranches of Original Deferred Benefit</b>  <u>Eligible for Testing:</u> Status 4	Member has no 'PEN' tranche (DEF-TYPE) or has one with a value less than or equal to a small figure (default of £1.00) agreed with customer. (including negative values)	'PEN' + 'UPEN' + 'TAPE' does not equal Total Initial Pension	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 (default of £1.00) agreed with customer	Member with post 31/03/2014 (15 S&NI) service has no 'CARE' tranche or has one with a value less than or equal to a small figure (default of £1.00) agreed with customer	Member with CARE5050 or TVINLG50 CARE data has no 'CP50' tranche or has one with a value less than or equal to a small figure (default of £1.00) agreed with customer	Member with pre 01/04/2008 (09 S&NI) service has no 'RA' tranche or has one with a value less than or equal to a small figure (default of £1.00) agreed with customer
Tested: 11513	Failed: 24	Failed: 4	Failed: 50	Failed: 34	Failed: 0	Failed: 9



Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>Total Gross Pension</b>  <u>Eligible for Testing:</u> Status 5 & T	No value in Initial Pension (PEN-TOT-IP)	The value in Initial Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	No value in total current pension (PEN-TOT-C)	The value in total current Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	PI date (PEN-INC-DT) must be present and later than DJF	
Tested: 11065	Failed: 4	Failed: 3	Failed: 0	Failed: 3	Failed: 1	
<b>Tranches of Pension</b>  <u>Eligible for Testing:</u> Status 5 & T	'PEN' tranche (PEN-TYPE) has a value less than or equal to a small figure (default of £1.00) agreed with customer	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 or equal to a small figure (default of £1.00) agreed with customer	Member with post 31/03/2014 (15 S&NI) service has no 'CARE' tranche or has one with a value less than or equal to a small figure (default of £1.00) agreed with customer	Member with CARE5050 or TVINLG50 CARE data has no 'CP50' tranche or has one with a value less than or equal to a small figure (default of £1.00) agreed with customer	Last PI date (PEN-PI-DT[1]) is earlier than last PI date processed by customer	
Tested: 11065	Failed: 5	Failed: 0	Failed: 0	Failed: 5	Failed: 89	
<b>Total Gross Dependant Pension</b>  <u>Eligible for Testing:</u> Status 6	No value in Initial Pension (DEP-TOT-IP)	The value in Initial Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	No value in total current pension (DEP-TOT-C)	The value in total current Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	PI date (DEP-INC-DT) must be present	
Tested: 1682	Failed: 1	Failed: 0	Failed: 0	Failed: 0	Failed: 1	

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>Tranches of Dependant Pension</b>  <u>Eligible for Testing:</u> Status 6	'PEN' tranche (DEP-TYPE) has a value less than or equal to a small figure (default of £1.00) agreed with customer	Last PI date (DEP-PI-DT) is earlier than last PI date processed by customer				
Tested: 1682	Failed: 0	Failed: 18				

## Other Member Details

Pension Credit members are excluded from tests in this category.

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>Date of Leaving</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T	A non-Status 1 member has a blank entry or an invalid date in Date Left (DATE-LEFT)	Date Joined Fund (DJF) is either blank or earlier than or equal to 1/1/1900	Date Joined Fund is later than or equal to Date Left if Date Left present	Date left is present for a status 1 member who does not have a previous status of 4 or 9		
Tested: 45244	Failed: 2	Failed: 0	Failed: 1	Failed: 143		
<b>Date Joined Scheme</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	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	Date Joined Fund (DJF) is earlier or equal to Date of Birth (DOB) plus 15 years				
Tested: 45244	Failed: 1	Failed: 0				
<b>Employer Details</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	Location (LOCATION) is blank	Date Joined employer (DT-JOIN-EM) is either blank or earlier than or equal to 1/1/1900	Date Joined employer must be earlier than date of birth (DOB) plus 15 years	Employment type (CLASS) is blank		
Tested: 45244	Failed: 0	Failed: 1	Failed: 0	Failed: 0		

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>Salary (Final Salary members)</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	A member with pre-01/04/2014 (2015 in S&NI) service has an invalid or blank date in the latest instance of Pensionable remuneration (PEN-REM)	For non-status 1 or 2 members, the latest instance of Pensionable remuneration does not equal the member’s DATE-LEFT	The latest instance of Pensionable remuneration contains a valid date (PEN-REM-DT) but there is no corresponding amount	Status 4 member does not have a value in DEF-PENREM or a value less than a small figure (default of £1.00) agreed with customer	Status 5 or T member does not have a value in PEN-PS-REM or a value less than a small figure (default of £1.00) agreed with customer	For status 1 members the latest pensionable remuneration date must be equal to or later than the customer’s last posting date
Tested: 43230	Failed: 187	Failed: 0	Failed: 196	Failed: 3	Failed: 6	Failed: 351
<b>Contributions</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	Total Paid Including Interest (TCI-TOTAL) is blank or less than a small figure (default of £1.00) agreed with customer	For status 1 members the latest date must be equal to or later than the customer’s last posting date and have a corresponding figure				
Tested: 45244	Failed: 12743	Failed: 752				
<b>Leavers</b>  <u>Eligible for Testing:</u> Status 4, 5, 9 & T	Date Left (DATE-LEFT) is either blank or is earlier than or equal to 1/1/1900	Date Joined Scheme (DJF) is either blank or is earlier than or equal to 1/1/1900	Date Left is earlier than Date Joined Scheme			
Tested: 24239	Failed: 4	Failed: 0	Failed: 0			
<b>Service</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5, 9 & T	If DCCPS > DJF, and DJF < 01/04/2014(15 S&NI)), service history must be present					
Tested: 45244	Failed: 415					

## CARE Benefits

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>CARE data</b>  <u>Eligible for Testing:</u> All status 1 and status 2, 4, 5, 9 & T where Date Left is after 31/03/14 (31/03/15 in S&NI)	If member has post-31/03/2014 (2015 in S&NI) service then at least one of LGPSMAIN or LGPS5050 must be present if the member joined before the start of the current scheme year	Every 31/03 from later of DJF or 2015 (2016 in S&NI) to earlier of date-left or current date must be present as an end date on at least one of LGPSMAIN, LGPS5050, TVINLGMN or TVINLG50	If contributions at any 31/03 from later of DJF or 2015 (2016 in S&NI) to earlier of date-left or current date are > 0, there must be an entry on at least one of LGPSMAIN or LGPS5050 for the same date with a pay figure > 0			
Tested: 25937	Failed: 331	Failed: 3165	Failed: 2788			
<b>CARE revaluation</b>  <u>Eligible for Testing:</u> Revaluation Factor Table	Every 31/03 from 2015 (2016 in S&NI) to date must be present on factor table 000/B/00/684/2014/0101 2012	The rates on the table do not match the record of HM treasury rates				
	Failed:	Failed:				

## HMRC

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>BCE 2</b>  <u>Eligible for Testing:</u>  Status 5 & T where Date Retired > 6/4/2006	Crystallisation Date (CRYS-CRYSYSD) is not a valid date or is earlier than date left	PLA Value (CRYS-PLA) is blank	PLA% (CRYS-PLAPC) is blank			
Tested: 6510	Failed: 69	Failed: 0	Failed: 0			
<b>BCE 5</b>  <u>Eligible for Testing:</u>  Status 4 & T	Any member of these deferred statuses where the member is over the age of 75					
Tested: 11523	Failed: 0					
<b>BCE 6</b>  <u>Eligible for Testing:</u>  Status 5 & T where Date Retired > 6/4/2006 and Age at Date Retired < 75	Crystallisation Date is not a valid date (CRYS-PPD) or is earlier than date left	PCLS amount (CRYS-PPA) is blank if PEN-TOT-AL is > zero	There is a date in Serious Ill Health Lump Sum Payment (CRYS-ILLD) but no corresponding amount (CRYS-ILLA)  OR  There is an amount in Serious Ill Health Lump Payment but no corresponding date			
Tested: 6507	Failed: 69	Failed: 2	Failed: 0			

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>BCE 7</b>  <u>Eligible for Testing:</u> Status 7 where Date of Death (from Exit Details) is after 6/4/06 and within 5 years of Date Retired	Total death grant (CDTC-TOTLS) is blank (To be checked in first run and removed if deemed not relevant.)	There is a value >0 in Total death grant but one or more of the following fields is blank or 0:  Crystallised Value at Date of Death (CDTC-CVAL)  Crystallised % Value at Date of Death (CDTV-CVALP)				
Tested: 180	Failed: 24	Failed: 1				
<b>BCE 8</b>  <u>Eligible for Testing:</u> Status 3 where Date Left is > 6/4/2006 and there is a value in QROPS Transfer Date	QROPS Transfer Date (CRYS-TFRD) is not a valid date or is earlier than date left	QROPS Transfer Amount (CRYS-TFRA) is blank	Date of Birth (DOB) is not a valid date	Age at QROPS Transfer Date is over 75		
Tested: 5	Failed: 0	Failed: 0	Failed: 0	Failed: 0		

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>Lifetime Allowance Charge paid</b>  <u>Eligible for Testing:</u> Status 5 & T where Date Retired is after 6/4/2006 (ignoring members where Date, Amount & Indicator) are ticked in either Enhanced Protection or Payment of PCLS Reportable Events (Reportable Events 1 & 2 on Crystallisation screen)	Value in Used PLA% (CRYS-TPPC) is greater than 100% and there is no value in any of LTA Charge (CRYS-LTACH), 25% LTA Charge (CRYS-LTA25) or 55% LTA Charge (CRYS-LTA55)					
Tested: 6505	Failed: 2					
<b>Annual Allowance</b>  <u>Eligible for Testing:</u> Status 1	Latest annual allowance PIP end date is earlier than the latest run by the customer	If a scheme pays indicator is ticked, the scheme pays amount is not present OR a scheme pays amount is present, but the scheme pays indicator is not ticked				
Tested: 19637	Failed: 260	Failed: 2				



## Contracting Out

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>Date Contracted Out</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T	Contract-Out SSPA75 is blank and DJF is prior to 6/4/16	Contract-Out SSPA75 is prior to 6/4/78	The date in Contract-Out SSPA75 is later than 5/4/16			
Tested: 43594	Failed: 171	Failed: 0	Failed: 0			
<b>NI Contributions/Earnings History</b>  <u>Eligible for Testing:</u> Status 1, 2, 4, 5 & T where NI-Table is not E and date contracted out is on or after 6/4/78 AND before 6/4/1997	A Status 4 member is missing Date Left Active Service or a Status 5 member is missing both Date Left Active Service and Date of Retirement	For one or more of the Period End Dates, there is not a corresponding value in Amount	There is not a separate entry in Period End Date (NI) for each April 5th between Date Contracted Out and 5/4/97 (or Date Left/Date Ret if earlier for Status 4 & 5 respectively) (non-reportable – see fail E)	GMP is not present on the NI details for status 1 and 2 and on GMP details for status 4, 5 & T (non-reportable – see fail E)	Fail C and Fail D both occurred	
Tested: 10620	Failed: 0	Failed: 61	Failed: 0	Failed: 0	Failed: 1947	
<b>Pre 88 GMP</b>  <u>Eligible for Testing:</u> Status 4, 5 & T where Contract Out SSPA75 is before 6/4/88	There is no value provided for total GMP at exit	Deducting Post 88 GMP at Exit from Total GMP at Exit results in a negative number	The result of deducting Post 88 GMP at Exit from Total GMP at Exit is not divisible by 52.			
Tested: 5939	Failed: 1168	Failed: 11	Failed: 1			

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<b>Post 88 GMP</b>  <u>Eligible for Testing:</u> Status 4, 5 & T where Contract Out SSPA75 is before 6/4/97 and Date Left is after 6/5/1988	There is no value provided for total GMP at exit	There is no value provided for Post 88 GMP at Exit	Post 88 GMP at Exit is not divisible by 52			
Tested: 9762	Failed: 1845	Failed: 2043	Failed: 1			

