



Aquila Heywood

Local Government Pension Scheme Common Data Quality Report Croydon Pension Fund

August 2021

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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 Croydon Pension Fund (Croydon), Aquila Heywood has completed a review of Croydon'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 Croydon. To provide focus on the key areas of common data to be addressed, each data category is measured against an agreed benchmark.

In 2020, 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

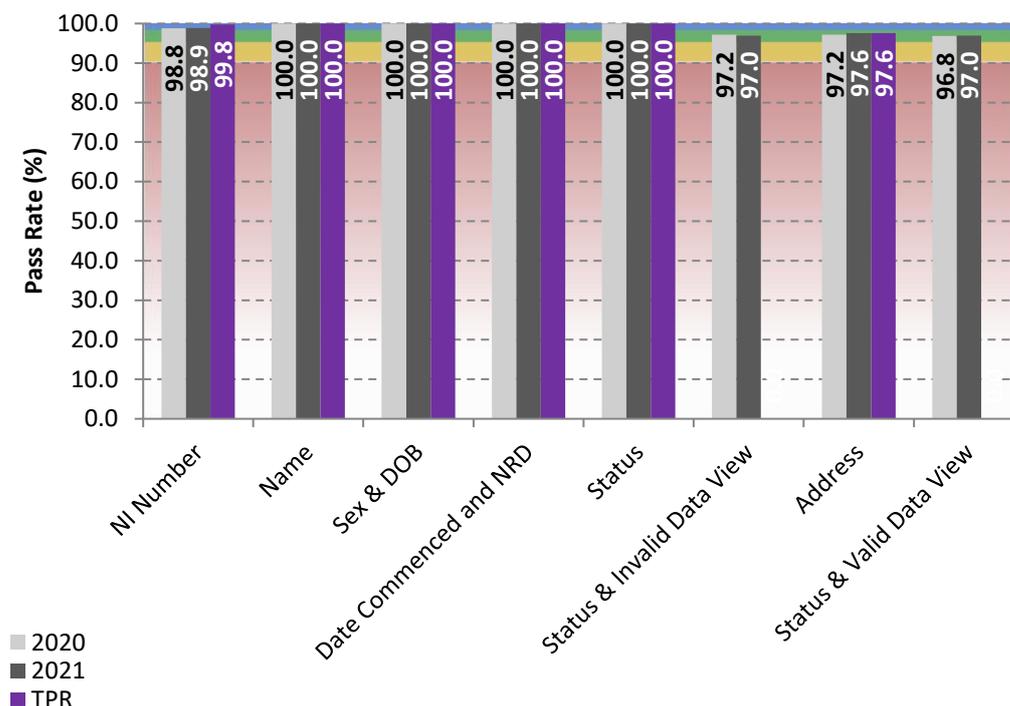
The benchmarks applied to the results presented in this report were agreed between Croydon and Aquila Heywood. The categories and thresholds are as follows:

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 Croydon's performance for each data category against the agreed scheme benchmarks together with the results from the 2020 tests. The results presented herein are generated from data extracted from Croydon's Live Altair service on 5th August 2021 for all tests. The 2020 tests were generated from data extracted on 24th July 2020. The overall percentage of tests passed for Croydon's common data is **98.8%** which is the same score that was achieved in 2020. The 2021 tests were conducted on 53,503 member records, an increase of 2,337 on 2020.

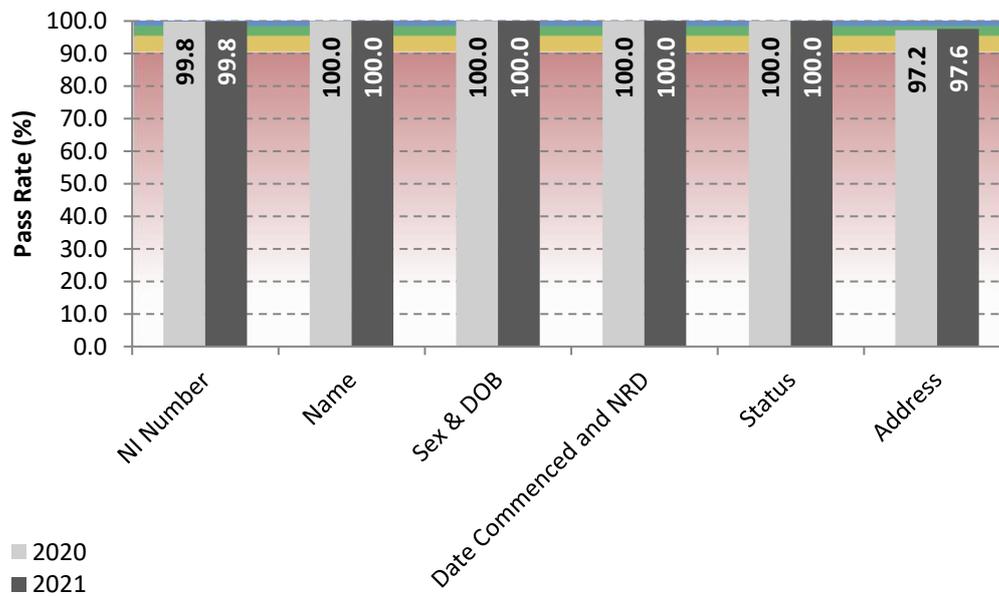


5 of the 8 categories met the highest benchmark of greater than 98% with 3 categories not recording a single failure. A further category has been rounded to 100% with a score greater than 99.95%. The lowest scoring categories concerned member **Status and Invalid Data Views** and **Status and Data Views**. Both of these categories scored 97.0%. The general quality of the common data tested at Croydon is of a high standard.

The percentage of member records without a single common data failure is **91.0%**. This represents an increase of 0.8% on the 2020 score of 90.2%.

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 **97.5%**. This is the figure to be quoted on the scheme return to TPR. This score represents a 0.5% improvement over the 2020 score of 97.0%. The core test scores for each category are shown below.



Condition	Qualifying Members		Pass Rate		Areas for Review	Comments
	Tested (change)	Passed (change)	Overall (change)	TPR		
Name <u>Eligible for Testing:</u> All members	53503 (+2337)	53503 (+2337)	100% (0%)	100% (0%)	Fail A: 0 Fail B: 0 Fail C: 0	All members tested pass all tests in this category for the second consecutive year.
Sex and Date of Birth <u>Eligible for Testing:</u> All members (Leavers and deaths excluded from test D)	53503 (+2337)	53503 (+2338)	100% (+0%)	100% (+0%)	Fail A: 0 Fail B: 0 Fail C: 0 Fail D: 0	All members tested pass all tests in this category. In 2020, 1 member had an incorrect Date of Birth.
Date commenced and NRD <u>Eligible for Testing:</u> All members	53503 (+2337)	53502 (+2339)	100% (+0%)	100% (+0.01%)	Fail A: 0 Fail B: 1	<p>The number of members failing a test has reduced by 2 to 1 since 2020.</p> <p>1 member has a date joined fund earlier than their 15th birthday. This test is not included in the TPR core tests.</p>
Status <u>Eligible for Testing:</u> All members	53503 (+2337)	53503 (+2338)	100% (+0%)	100% (0%)	Fail A: 0 Fail B: 0 Fail C: 0	All members tested have a valid status recorded. In 2020, 1 member had a status mismatch.

Condition	Qualifying Members		Pass Rate		Areas for Review	Comments
	Tested (change)	Passed (change)	Overall (change)	TPR		
Status and invalid data view <u>Eligible for Testing:</u> All members	53503 (+2337)	51880 (+2170)	97% (-0.19%)	N/A	Fail A: 245 Fail B: 1145 Fail C: 198 Fail D: 52	<p>The number of members failing a test has increased by 167 to 1623 since 2020 and the reason should be investigated. This category does not count towards the core tests.</p> <p>245 members have an 'Exit' data view which is not in line with their status history. 1145 members have an unexpected 'deferred' data view. 198 members have a 'pensions' data view which is not reflected in their status history. 52 members have an unexpected 'dependants' data view which is not in line with their status history. All tests have seen an increase in the number of fails.</p> <p>A total of 1623 members have unexpected data views:</p> <ul style="list-style-type: none"> - 237 leavers and 832 deceased, that are a lower priority; - 114 are active members; - 5 are undecided leaver; - 95 are deferred pensioners; - 86 are pensioners; - 3 are dependants; - 18 are frozen refund cases; - 204 are for aggregated records; - 29 are for optants out who would not be expected to have any data of this kind. <p>17 members have more than 1 unexpected data view. 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		
Address <u>Eligible for Testing:</u> All members except leavers and deaths (status 3 and 7)	53503 (+2337)	52229 (+2493)	97.6% (+0.41%)	97.6% (+0.41%)	Fail A: 392 Fail B: 229 Fail C: 633 Fail D: 24 Fail E: 1	<p>The number of members failing a test has reduced by 156 to 1274 resulting in an improvement of 0.41% in the pass rate since 2020.</p> <p>392 members have no address recorded and 229 members have an address recorded but the first line is blank. 633 members are recorded as “gone away”. 24 members have no Postcode recorded.</p> <p>A further 1 postcode is in an incorrect format. This test does not count towards the TPR core tests.</p> <p>Of the 24 members with a missing postcode, 5 are also recorded as “gone away”. 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		
<p>Status and valid data view</p> <p><u>Eligible for Testing:</u> Members with deferred benefits or benefits in payment (Status 4, 5, 6, 7, 9 and T)</p>	53503 (+2337)	51881 (+2333)	97% (+0.13%)	N/A	Fail A: 26 Fail B: 0 Fail C: 0 Fail D: 128 Fail E: 1057 Fail F: 411	<p>The number of members failing a test has increased by 4 to 1622, however due to an increase in eligible members the pass rate has increased by 0.13%. This category is not included in the TPR core results.</p> <p>26 deferred members are missing deferred details, 2 more than in 2020, and should be investigated urgently.</p> <p>128 deceased cases from either active or deferred status are missing exit details where the death grant is recorded; 67 were active, 1 was undecided leaver and 60 were deferred.</p> <p>1057 deceased members who were pensioners do not have a date recorded for when the pension ceased. Similarly, 411 dependant members are missing dependant details.</p>

3 Data Correction Plan

The table below provides Croydon 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"> Investigate as a priority the 30 cases with blank NI numbers Obtain correct NI numbers for the members with temporary numbers or those in the incorrect format 	<ul style="list-style-type: none"> 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"> Investigate the incorrect date joined fund for the 1 member 	<ul style="list-style-type: none"> Medium
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"> • Correct the 26 deferred members with missing benefit details • Investigate the 128 death, from active, undecided leaver and deferred status with missing exit details • The 1468 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
<p>NI Number</p> <p><u>Eligible for Testing:</u> All members</p>	NI Number (NI-NUMBER) is blank	<p>NI number is temporary (commences TN) and is not a child pension (DEPND-TYPE = 'C')</p> <p>Leavers (3) and deaths (7) are excluded from the TPR results</p>	<p>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)</p> <p>Test is excluded from the TPR results</p>			
Tested: 53503	Failed: 30	Failed: 559	Failed: 18			
<p>Name</p> <p><u>Eligible for Testing:</u> All members</p>	Surname (SURNAME) is blank	Forenames (FORENAMES) is blank	<p>Initials (INITIALS) is blank</p> <p>Test is excluded from the TPR results</p>			
Tested: 53503	Failed: 0	Failed: 0	Failed: 0			

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
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: 53503	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: 53503	Failed: 0	Failed: 1	Failed:			
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: 53503	Failed: 0	Failed: 0	Failed: 0			

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
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: 53503	Failed: 245	Failed: 1145	Failed: 198	Failed: 52		
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: 53503	Failed: 392	Failed: 229	Failed: 633	Failed: 24	Failed: 1	

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
<p>Status and valid data view</p> <p><u>Eligible for Testing:</u> Members with deferred benefits or benefits in payment (Status 4, 5, 6, 7, 9 and T)</p> <p>Category is excluded from the TPR results</p>	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: 53503	Failed: 26	Failed: 0	Failed: 0	Failed: 128	Failed: 1057	Failed: 411

