Local Government Pension Scheme Common Data Quality Report
Croydon Pension Fund

September 2022

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1 Executive Summary

1.1.1. 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 Heywood Consulting has assisted customers in the collection and qualification of this data.

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

1.1.2. Data Quality Service

Working with the Croydon Pension Fund (CPF), Heywood Consulting has completed a review of CPF common pension data in line with the guidance notes set down by TPR. Heywood Consulting'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 CPF. 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.

1.1.3. Benchmark

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

Pass Threshold
Pass rate >= 98%
95% <= Pass rate < 98%
90% <= Pass rate < 95%
Pass rate < 90%

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

1.1.4. Summary of Common Data Results

The graph below indicates CPF performance for each data category together with the results from the 2021 tests. The results presented herein are generated from data extracted from CPF's live Altair on 3rd October 2022. The overall percentage of tests passed for CPF common data is 98.7% which is a decrease of 0.1% on the 2021 score of 98.8%. The 2022 tests were conducted on 44,271 member records.

The percentage of member records without a single common data failure is 90.9%. This represents a decrease of 0.1% on the 2021 score of 91.0%.

	Overall Total	NI Number	Name	Sex/DOB	Date Commenced	Status	Invalid DV	Address	Valid DV
	-0.11% ↓	-0.26% ↓	0.00% →	0.00% →	0.00% →	0.00% →	-0.90% ↓	-1.17% ↓	-0.18% ↓

Prev Overall %: 91.00%, Curr Overall %: 90.89%, Prev NI Number %: 98.90%, Curr NI Number %: 98.64%, Prev Name %: 100.00%, Curr Name %: 100.00%, Prev Sex/DOB %: 100.00%, Curr Sex/DOB %: 100.00%, Prev Date Comm %: 100.00%, Curr Date Comm %: 100.00%, Prev Status %: 100.00%, Curr Status %: 100.00%, Prev Invalid DV %: 97.00%, Curr Invalid DV %: 96.10%, Prev Address %: 97.60%, Curr Address %: 96.43%, Prev Valid DV %: 97.00%, Curr Valid DV %: 96.82%

Five of the eight categories met the highest threshold of greater than 98% with four categories not recording a single failure. The lowest scoring category concerned member **Address** that achieved a score of 96.4% which is a decrease on the 2021 score of 97.6%.

The general quality of the common data tested at CPF is of a high standard.

1.1.5. 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 97.4%. This is the figure to be quoted on the scheme return to TPR. This represents a decrease of 0.1% on the 2021 score of 97.5%. The core test scores for each category are shown below.

Invalid and Valid Data View categories have been marked as scoring 100% as they are not included in the TPR core results.

2 Analysis of Common Data Results

Specific tests are checked in each of the core categories. The image below provides a breakdown of the failure types. Refer to section 3 Areas for Review for more detail.

Category	Tested	Passed	Pass Rate %	Failures		Failures
NI Number	44,271	43,668	98.6%	603	Fail A: NI Number (NI-NUMBER) is blank	38
					Fail B: NI number is temporary	548
					Fail C: NI number does not adhere to standard	17
Name	44,271	44,271	100.0%	0	Fail A: Surname (SURNAME) is blank	0
					Fail B: Forenames (FORENAMES) is blank	0
					Fail C: Initials (INITS) is blank	0
Sex & DOB	44,271	44,271	100.0%	0	Fail A: Sex (SEX) is blank	0
					Fail B: Sex is not Male or Female	0
					Fail C: Date of Birth (DOB) is blank	0
					Fail D: Date of Birth <= 01/01/1900	0
Date commenced ..	44,271	44,271	100.0%	0	Fail A: Date Joined fund (DJF) is blank	0
					Fail B: Date Joined Fund is earlier than Date of Birth plus 15 ..	0
Status	44,271	44,271	100.0%	0	Fail A: Status (STATUSKEYF) is blank	0
					Fail B: Invalid Status	0
					Fail C: Status on member summary does not match basic de..	0
Status and invalid data view	44,271	42,545	96.1%	1,726	Fail A: Exit Details	323
					Fail B: Deferred Details	1,180
					Fail C: Pension Details	205
					Fail D: Dependant Details	57
Address	30,116	29,040	96.4%	1,076	Fail A: Address record does not exist	360
					Fail B: Address record exists, but line 1 (ADD-LINE-1) is blank	143
					Fail C: Gone Away (ADD-GONAWY) indicator is set	592
					Fail D: Postcode is blank and address is not overseas	81
					Fail E: Postcode format invalid and address is not overseas	4
Status and valid data view	27,606	26,729	96.8%	877	Fail A: Deferred Details	2
					Fail B: Pension Details	0
					Fail C: Dependant Details	0
					Fail D: Exit Details	116
					Fail E: Date pension ceased	362
					Fail F: Date pension ceased	402

3 Areas For Review

Condition	Members Tested	Members Passed	Pass Rate %	Areas For Review	Comments
NI Number Eligible for Testing: All Members	44,271	43,668	**Overall:** 98.6% **TPR:** 99.7%	Fail A: 38 Fail B: 548 Fail C: 17	The number of members to pass tests has increased by 4. 38 Members, 32 of which are non-child dependants, have a blank NI number. These should be addressed as a priority. There are 548 members with a temporary NI number to be addressed: • 204 Leavers and 268 deceased, that may be dealt with as a lower priority. These are excluded from the TPR results: • 3 are active members • 8 are deferred pensioners • 1 is a dependant • 45 are frozen refunds • 17 are optant outs • 3 are status Z (aggregation) but 1 of the members looks to be a member used for testing (surname = TEST in a test employer)

					17 members have an NI Number with an incorrect format which is not a core test. 4 of these are leavers and 9 are deceased members. Of the remaining 4 members, 2 are frozen refund and 2 are optant out.
Name Eligible for Testing: All Members	44,271	44,271	**Overall:** 100% **TPR:** 100%	Fail A: 0 Fail B: 0 Fail C: 0	All member records have valid name fields recorded as they did in 2021.
Sex and Date of Birth Eligible for Testing: All Members (Leavers and Deaths excluded from test D)	44,271	44,271	**Overall:** 100% **TPR:** 100%	Fail A: 0 Fail B: 0 Fail C: 0 Fail D: 0	All member records have a valid sex and date of birth recorded as they did in 2021.
Date Commenced and NRD Eligible for Testing: All Members	44,271	44,271	**Overall:** 100% **TPR:** 100%	Fail A: 0 Fail B: 0	All members have a valid date commenced and NRD this year. 1 member failed a test in 2021.

Status Eligible for Testing: All Members	44,271	44,271	**Overall:** 100% **TPR:** 100%	Fail A: 0 Fail B: 0 Fail C: 0	All members tested have a valid status recorded as they did in 2021.
Status and Invalid Data view Eligible for Testing: All Members *This category is excluded from the TPR core results*	44,271	42,545	**Overall:** 96.1% **TPR:** N/A	Fail A: 323 Fail B: 1180 Fail C: 205 Fail D: 57	This condition is excluded from the TPR results. The number of members failing this condition has increased by 103. 323 members have an exit data view which is not in line with their status history. 1,180 members have an unexpected 'deferred' data view having never been deferred. This has increased by 35 members. 205 members have an unexpected 'pensions' data view, an increase of 7. 57 members have an unexpected 'dependants' data view. 1,726 member records have unexpected data views: • 233 are leavers and 819 are deceased that may be dealt with as a lower priority • 144 are active members • 9 are undecided leavers • 133 are deferred pensioners • 91 are pensioners • 2 are adult dependants • 35 are frozen refunds • 226 are aggregated records • 34 are optant outs who would not be expected to have any data of this kind.

Address Eligible for Testing: All Members except leavers and deaths	30,116	29,040	**Overall:** 96.4% **TPR:** 96.4%	Fail A: 360 Fail B: 143 Fail C: 592 Fail D: 81 Fail E: 4	The number of members failing tests has reduced by 198 to 1076. 360 members have no address recorded, a reduction of 30 from 2021. 143 members have an address record, but the 1st line is blank. 592 members are recorded as "gone away". 81 members have no postcode recorded. These tests are included in the TPR core results. A further 4 postcodes are in an incorrect format. This test does not count towards the TPR core results.
Status and Valid Data view Eligible for Testing: All Members *This category is excluded from the TPR core results*	27,606	26,729	**Overall:** 96.8% **TPR:** N/A	Fail A: 2 Fail B: 0 Fail C: 0 Fail D: 116 Fail E: 362 Fail F: 402	This condition is excluded from the TPR core results. The number of members failing tests has decreased from 1,622 to 876. 2 deferred members are missing deferred details 116 deceased cases are missing exit details where death grant details are recorded. 362 deceased members who were pensioners do not have a date recorded for when the pension ceased. Similarly, 402 deceased dependants are missing a cease date.

4 Data Correction Plan

The table below provides CPF 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 3.

Data Category	Recommendation	Suggested Priority
NI Number	• Obtain NI numbers for those missing an entry, in particular the actives and dependent • Obtain the correct NI numbers for the members with temporary numbers or those in the incorrect format	• High • Low
Name	• No issues found	
Sex and Date of Birth	• No issues found	
Date Commenced and NRD	• No issues found	
Status	• No issues found	
Status and Invalid Data View	• 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	• **High**
Address	• Current addresses should be sought and uploaded for the members that failed this category	• Medium
Status and Valid Data View	• Correct the 2 deferred pensioners missing benefit details	• **VERY HIGH**

Data Category	Recommendation	Suggested Priority
	• The 116 deaths from active and deferred status may be missing death grant data and should be investigated	• Low
	• The 764 pensioner and dependent deaths with missing cease dates should be investigated and corrected	• Low

5 Appendices

5.1. Appendix A – TPR Guide

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 effectively be the 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, e.g., active or deferred member with partial retirement. For contract-based schemes this may be 'active' or 'inactive'.

Data Field	TPR Comment
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.
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.

5.2. Appendix B – Common Data and Fail Criteria

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
NI Number <u>Eligible for Testing:</u> All Members*	NI Number (NINUMBER) is blank	NI number is temporary (commences TN) and is not a child pension (DEPND-TYPE = 'C') *Current status 3 (leaver) and 7 (death) 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) *This test is excluded from the TPR results*			
Tested: 44,271	Failed: 38	Failed: 548	Failed: 17			
Name <u>Eligible for Testing:</u> All Members*	Surname (SURNAME) is blank	Forenames (FORENAMES) is blank	Initials (INITS) is blank *This test is excluded from the TPR results*			
Tested: 44,271	Failed: 0	Failed: 0	Failed: 0			

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Sex and Date of Birth Eligible for Testing: 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 *Current status 3 (leaver) and 7 (death) are excluded from the TPR results*		
Tested: 44,271	Failed: 0	Failed: 0	Failed: 0	Failed: 0		
Date Commenced and NRD Eligible for Testing: All Members*	Date Joined fund (DJF) is blank *Status 6 or Status O or previous status 6 are excluded from the test*	Date Joined Fund is earlier than Date of Birth plus 15 years *Status 6 or Status O or previous status 6 are excluded from the test* *This test is excluded from the TPR results*	NRD checks are not required as these are always calculated			
Tested: 44,271	Failed: 0	Failed: 0				
Status Eligible for Testing: 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			

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
			details (STATUS[1]) *This test is excluded from the TPR results			
Tested: 44,271	Failed: 0	Failed: 0	Failed: 0			
Status and Invalid Data Eligible for Testing: All Members *Category is excluded from 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: 44,271	Failed: 323	Failed: 1,180	Failed: 205	Failed: 57		
Address Eligible for Testing: 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 (ADDGONAWY) 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 (1st letter =Q, V or X, 2nd letter is I, J or Z, 3rd, 4th or 5th character is not a space) *This test is excluded from the TPR results	

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Tested: 30,116	Failed: 360	Failed: 143	Failed: 592	Failed: 81	Failed: 4	
Status and Valid Data Eligible for Testing: Members with deferred benefits or benefits in payment (Status 4, 5, 6, 7, 9 and T) *Category is excluded from 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: 27,606	Failed: 2	Failed: 0	Failed: 0	Failed: 116	Failed: 362	Failed: 402