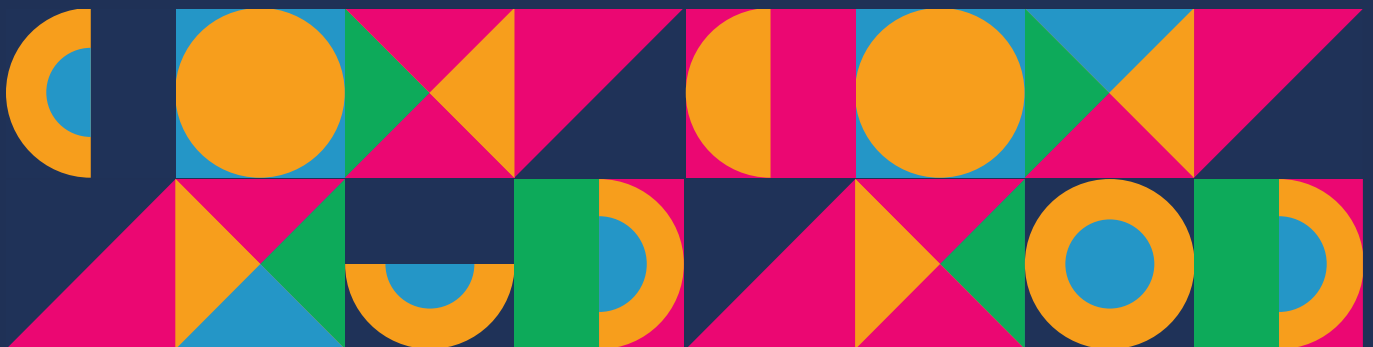# Local Government Pension Scheme
Common Data Quality Report
Kent County Council

October 2022

Table of Contents

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 Kent County Council (Kent), Heywood Consulting has completed a review of Kent 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 Kent. 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 Kent 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 Kent's performance for each data category. The overall percentage of tests passed for Kent common data is 98.9% which is lower than the 2021 score of 99.2%. The 2022 tests were conducted on 215,342 member records.

The percentage of member records without a single common data failure is 92.4%. This represents a decrease on the 2021 score of 93.6%.

Six of the eight categories met the highest benchmark of greater than 98% with two categories not recording a single failure, one further category has been rounded to 100% with a score of over 99.95%. The lowest scoring category concerned member Address that achieved a score of 92.4% which is a decrease on the 2021 score of 95.5%.

The general quality of the common data tested at Kent 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 95%. This is the figure to be quoted on the scheme return to TPR. This represents a decrease of 0.6% on the 2021 score of 95.6%. The core test scores for each category are shown below.

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	215,343	213,587	99.2%	1,756	Fail A: NI Number (NI-NUMBER) is blank	0
					Fail B: NI number is temporary	1,729
					Fail C: NI number does not adhere to standard	27
Name	215,343	215,343	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	215,343	215,343	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	215,343	215,337	100.0%	6	Fail A: Date Joined fund (DJF) is blank	6
					Fail B: Date Joined Fund is earlier than Date of Birth plus 15	0
Status	215,343	215,108	99.9%	235	Fail A: Status (STATUSKEYF) is blank	0
					Fail B: Invalid Status	235
					Fail C: Status on member summary does not match basic	0
Status and invalid data view	215,343	212,277	98.6%	3,066	Fail A: Exit Details	785
					Fail B: Deferred Details	1,121
					Fail C: Pension Details	953
					Fail D: Dependant Details	296
Address	149,014	137,663	92.4%	11,351	Fail A: Address record does not exist	1,263
					Fail B: Address record exists, but line 1 (ADD-LINE-1) is	1,379
					Fail C: Gone Away (ADD-GONAWY) indicator is set	1
					Fail D: Postcode is blank and address is not overseas	7,798
					Fail E: Postcode format invalid and address is not overseas	923
Status and valid data view	128,741	128,505	99.8%	236	Fail A: Deferred Details	1
					Fail B: Pension Details	0
					Fail C: Dependant Details	1
					Fail D: Exit Details	73
					Fail E: Date pension ceased	29
					Fail F: Date pension ceased	134

3   Areas For Review

Condition	Members Tested	Members Passed	Pass Rate %	Areas For Review		Comments
NI Number Eligible for Testing: All Members	215,343	213,587	**Overall:** 99.2% **TPR:** 99.9%	Fail A: Fail B: Fail C:	0 1,729 27	The number of members failing a test has decreased by 42 to 1,729 since 2021 resulting in a decreased of 0.1% to the pass rate. There are 1729 members with a temporary NI number to be addressed: 209 leavers and 1413 deceased, that may be dealt with as a lower priority. These are excluded from the TPR results; 2 are active and 3 are undecided leavers; 21 are deferred pensioners; 8 are adult dependants; 50 are frozen refund cases which may affect CEP payments; 23 are optants out. A further 27 members have an NI number with an incorrect format, 12 of which are leavers, 11 are deceased members and 1 is optant out. There are also 1 active member, 1 deferred member and 1 dependant that should be dealt with as a high priority. This test does not count towards the TPR core tests.

Condition	Members Tested	Members Passed	Pass Rate %	Areas For Review		Comments
Name Eligible for Testing: All Members	215,343	215,343	**Overall:** 100% **TPR:** 100%	Fail A: Fail B: Fail C:	0 0 0	All member records have a valid name recorded for the fifth consecutive year.
Sex and Date of Birth Eligible for Testing: All Members (Leavers and Deaths excluded from test D)	215,343	215,343	**Overall:** 100% **TPR:** 100%	Fail A: Fail B: Fail C: Fail D:	0 0 0 0	All member records had a valid sex and date of birth recorded for the third consecutive year
Date Commenced and NRD Eligible for Testing: All Members	215,343	215,337	**Overall:** 100% **TPR:** 100%	Fail A: Fail B:	6 0	The number of members failing a test has decreased by 1 since 2021. 6 leavers do not have a date joined fund.
Status Eligible for Testing: All Members	215,343	215,108	**Overall:** 99.9% **TPR:** 99.9%	Fail A: Fail B: Fail C:	0 235 0	267 members failed this test in 2021 this has now decreased by 32. 235 members have an invalid status D recorded and should be investigated immediately.

Status and Invalid Data view	215,343	212,277	**Overall:** 98.6%	Fail A: 785	This condition is excluded from the TPR results. The number of members failing tests in this condition has increased by 9 to 3,066. The reasons should be investigated.
Eligible for Testing: All Members			**TPR:** N/A	Fail B: 1,121 Fail C: 953 Fail D: 296	785 members have an 'Exit' data view which is not in line with their status history. 1121 members have an unexpected 'deferred' data view having never been deferred on their status history. 953 members have an unexpected 'pensions' data view. 296 members have an unexpected 'dependants' data view. All tests except D have seen an increase in the number of fails since 2021.
This category is excluded from the TPR core results					3,066 members have unexpected data views:

3,066 members have unexpected data views:

- 388 leavers and 1551 deceased, that may be dealt with as a lower priority;
- 115 are active members and 43 are undecided leavers;
- 25 are deferred pensioners;
- 691 are pensioners;
- 1 is a dependant;
- 1 is for a frozen refund case;
- 30 are for aggregated records;
- 8 are for optants out who would not be expected to have any data of this kind;
- 213 are for incorrect status D members;

80 members have more than 1 unexpected data view.

Condition	Members Tested	Members Passed	Pass Rate %	Areas For Review		Comments
Address Eligible for Testing: All Members except leavers and deaths	149,014	137,663	**Overall:** 92.4% **TPR:** 93%	Fail A: Fail B: Fail C: Fail D: Fail E:	1,263 1,379 1 7,798 923	The number of members failing a test has decreased by 584 to 11351 since 2021. 1,263 members have no address recorded. 1,379 members have an address recorded but the first address line is blank. 1 member is recorded as "gone away". 7,798 members have no Postcode recorded. A further 923 postcodes are in an incorrect format. This test does not count towards the TPR core tests. Some of the remaining members may be overseas without having the overseas indicator set.

Condition	Members Tested	Members Passed	Pass Rate %	Areas For Review		Comments
Status and Valid Data view Eligible for Testing: All Members *This category is excluded from the TPR core results*	128,741	128,505	**Overall:** 99.8% **TPR:** N/A	Fail A: Fail B: Fail C: Fail D: Fail E: Fail F:	1 0 1 73 29 134	This condition is excluded from the TPR results. The number of members failing tests has decreased by 279 since 2021 to 238. 1 deferred member is missing deferred details. This should be addressed immediately as this data view records the member's benefits. 1 Dependant Pensioner is missing Dependant details. 73 deceased cases from active or deferred status are missing exit details where death grant details are recorded. 29 deceased members who were pensioners do not have a date recorded for when the pension ceased. Similarly, 134 deceased dependants are missing a cease date.

4   Data Correction Plan

The table below provides Kent 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 correct NI numbers for the members with temporary numbers or those in the incorrect format	• Low
Name	• No issues found	
Sex and Date of Birth	• No issues found	
Date Commenced and NRD	• Obtain commencement dates for the 6 leavers	• Low
Status	• The 235 members recorded as the invalid status "D" should be corrected as soon as possible	• **High**
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 1 deferred member missing benefit details & 1 Dependant missing dependant details.	• **VERY HIGH**

	• The 29 deaths from active and deferred status may be missing death grant data and should be investigated	• Low
	• The 163 pensioner and dependant 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.

Data Field	TPR Comment
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, e.g., 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.
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 Eligible for Testing: 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: 215,343	Failed: 0	Failed: 1,729	Failed: 27			
Name Eligible for Testing: All Members*	Surname (SURNAME) is blank	Forenames (FORENAMES) is blank	Initials (INITS) is blank *This test is excluded from the TPR results*			
Tested: 215,343	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: 215,343	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: 215,343	Failed: 6	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: 215,343	Failed: 0	Failed: 235	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: 215,343	Failed: 785	Failed: 1,121	Failed: 953	Failed: 296		
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: 149,014	Failed: 1,263	Failed: 1,379	Failed: 1	Failed: 7,798	Failed: 923	
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: 128,741	Failed: 1	Failed: 0	Failed: 1	Failed: 73	Failed: 29	Failed: 134