Record Keeping Plan RKP2019

Index	Priority	Description	Responsible	Objectives For Record keeping Plan	Data Scope of the Member Categories To Be Included for Objectives	Data Scope Types Of Data	Expected Outcomes	Dependencies	Resources and Governance	Timeframe	January 2019 UPDATE
1.1	1	Pension Scheme Data Overall Objective for 2019	Scheme Manager supported by: The Pensions Board Chief Finance Officer Head of Finance Pension Manager Brent Pensions Team	Overall objectives for 2019 are: Improve scheme data to meet the legal requirements for common data, conditional data, and employer data. Update missing or incomplete scheme data wherever it is held within a reasonable time frame, to ensure that benefit statements not issued can be sent out as soon as possible To work together with the scheme's new Pensions Administrators, LPP, in ensuring the completeness and accuracy of both Common and Conditional Data. To have complete and accurate data ready by March 2019 for the Triennial valuation coming up in March 2019 To clear the backlog of missing addresses for deferred members. To issues Annual Benefit Statements to all eligible members of the scheme	As at 01/12/2018 Active Members (6860) Deferred Members (8196) Pensioners Dependants Frozen Refunds Total of the above (7565)	Common data Conditional Data Participating Employer (14) Brent Maintained Schools (56) Academies (23) Participating Employer refers to these three groups as appropriate: Participating Employers Maintained Schools Academies	Scheme data will be improved to meet the standards as set out in The Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014, and comply with the TPR guidance on record keeping for public sector schemes. Improvements in conditional and common data will be monitored by the Record Keeping Plan 2019. Going forward this will lead to: Less time taken to complete tasks such as annual benefits statements, existence exercises Scheme member communications being issued on time, annual benefits statement, pension statements Reducing time taken to complete events that require scheme data, year ends, financial reporting Assist with clearing any backlogs due to missing or incomplete scheme data Improving data scores to meet legal requirements Provide a higher standard of service to scheme members, quicker responses, reduced complaints Ensure any communications from the scheme reach as many scheme members as possible Ensure a smooth transition collaboration with the new scheme administrator LLP Getting scheme announcements to as many members as	LPP completing the data cleanse project on time. Brent Pensions team accurately recording starters and leavers. Accurate and timely data being provided by employers. Missing addresses for deferred members being identified and updated on the LPP system.	Brent Pensions Team Brent Finance Team Employers, academy's, maintained schools working with Brent to improve data TPR public sector guidance LPP resources (including dedicated teams for special projects) External Partners (Target)	All Year	LPP Data cleansing Plan on track to be delivered in line with agreed timeframes See 1.4 below Annual Benefit Statements for 2018: Not all ABS were issued to deferred members where there was a missing address. A company has been commissioned to locate these members and it is planned to commence this work once LPP's data cleanse project has completed so that any further missing addresses can be added to the list. Not all ABS were issued to active members where data was incomplete or missing. LPP are working with employers to obtain missing data and issue a manual statement to these members. Progress is being monitored as part of monthly contract monitoring.
1.2	2	Pension Scheme Data Participating Employers Objective	Scheme Manager supported by: The Pensions Board Chief Finance Officer Head of Finance Pension Manager Brent Pensions Team	Scheme Data Objectives for 2019 are to improve scheme data by: Data from participating employers to be complete and accurate Third party administrators LPP to be able to send out annual benefit statements on time and without issues. LPP to complete data cleanse project by June 2019 and ensure the data stored is accurate, complete and reliable	Active Members	Employee data held by participating employers	Improving communications, engaging, informing, and training our employers will play a major part in improving data accuracy and the delivery of that data within the specified time frames Improving communications and accurate data allows administration process to be done quicker with less delays, disclosure regulations met, members retiring on time, death benefits paid out quicker, less complaints, statutory report deadline met, more accurate reporting, more accurate valuations Employer forum will allow us to understand what it is that leads to employers not providing data on time and for Brent to put in place controls/processes that will help employers with understanding what it is they should be doing, and when, and how to get the help. More employer engagement will come from our new third party administrators the LPP, as they have resources to provide training and guidance.	An up to date employer contacts List Availability to scheme employers to attend the scheduled forums and training events LPP training and Guidance Materials Progress of 2019 valuation	Brent Pension Team Brent Finance Team Employers, academy's, maintained schools actively engaging with London Borough of Brent LPP resources and training materials	All Year	Workshops have been planned for end of February/early March 2019, ahead of the March Pensions Board Meeting. Training will be delivered by LPP, followed by a presentation from LBB. Further Employer Forum to be organised ahead of the triennial valuation. Revised Pensions Administration contract communicated to all employers and to be discussed further in workshops planned in February/March.

| 1.3 | 3 | Pension Scheme Data from Participating Employers | Scheme Manager supported by:

The Pensions Board
Chief Finance Officer
Head of Finance
Pension Manager
Brent Pensions Team | Electronic mailshot to inform participating employers of their legal duties in supplying complete and accurate information

Revised Pensions Administration Strategy to be communicated via workshops with employers to provide training on understanding of the statutory legal duties, acceptable performance levels and consequences for lack of compliance

Monitor that this is being complied with

Procedures put in place to monitor the data from participating employers with feedback from third party administrators LPP | Active Members | Data held by participating employers such as:

Salary Information
Missing Service
Contracted Hours
Missing Part Time Hours
Salary Below Minimum Wage
Incomplete CARE Events
Missing CARE salary history
Up to date addresses not held
Missing data as informed by our third party administrators Capita | Awareness from participation employers that they are legally required to send complete and accurate data, also payroll bureaus to be aware of data being submitted on time and accurate

With the administration being managed by the LPP, the electronic submission of data will make it easier for employers to export data to the LPP platform, the validation process will throw up errors and they will have to correct the data before reimporting, we can run a report and know exactly who has and hasn't uploaded their data so that engagement/training can begin as set out in the PAS. | LPP Online Platform being available on time

Engagement from scheme employers | Brent Pension Team

Brent Finance Team

Employers, academy's, maintained schools actively engaging with London Borough of Brent

LPP resources and training materials | All Year | As 1.2 |
| 1.4 | 1 | Data Cleansing Project following move to LPP Phase 1 | Scheme Manager supported by:
a) The Pensions Board
b) Chief Finance Officer
c) Head of Finance
d) Pension Manager
e) Brent Pensions Team
f) The LPP (Shared Agreement) | Ensuring Phase 1 is complete in line with agreed deadlines and no later than 30/06/2018.

Procedures to be put in place to monitor progress against agreed deadlines

Monitoring of progress for each of the 14 work streams | As at 01/12/2018

Active Members (6860)

Deferred Members (8196)

Pensioners
Dependants
Frozen Refunds
Total of the above (7565) | Common and Scheme Specific Data.

Specific focus on:

• Missing Final Salary
• Missing or incomplete CARE pots
• Missing leavers
• Employer code errors
• Missing Pensions
• Age Discrepancies
• Missing Actual Salary
• Post Codes
• Missing Joiners
• Missing PI Dates | In October 2018 the LBB pension administration service transferred to from Capita Employee Benefits to the LPP. The data received was of a low standard and it was agreed as part of the implementation project that LPP would carry out a review of the data post go live and put in place a remedial plan to address and fix the identified errors.

The project comprises of three phases to be undergone consecutively. Phase 1 focuses will address critical issues with common and scheme specific data, focusing on ensuring scheme data is accurate in time for the triannual valuation.

Phase 2 will address the additional errors that LPP have identified as requiring attention.

Phase 3 will seek to provide an update on the state of data following the completion of phase 1 and phase 2 work. This phase will also seek to carry out a reconciliation of data between Brent payroll and the Altair pension details.

The overall goal is for the fund to have confidence that the data held with respect to common and conditional data is accurate and reliable | Timely and accurate data from employers. From April 2019 an online platform will be launched where employers can upload data directly rather than completing cumbersome spreadsheets. This should improve the accuracy and timeliness of data.

A robust PAS is in place to deal with non compliant employers. This provides clarity on what scheme employers are required to do, along with penalties for non-compliance | LPP have a dedicated team working on this project
Status reports are provided to LBB on a monthly basis and discussed at month contract performance meetings.
Updates are reported to the Pension Board on a quarterly basis | January 2019 - June 2019 | **UPDATE FROM LPP ON CURRENT POSITION**
Work Stream 11 - Missing PI dates 27% complete
1,735 records were identified as having a missing PI date. So far, we have rectified 476 records on Altair. We have reviewed a further 435 records but for these members the PI Recalculation function on Altair has not worked correctly. We are making notes of pieces of information that seem to be a common theme for the records that Altair fails to increase properly (for example, the calculation will not run for records with CARE benefits). Once all the records have been reviewed, we will compile the failed records into batches that seem to share a common theme and decide what action should be taken to correct them.
Work Stream 2 - Missing Employer Code – 100% complete
68 records were identified as having a missing employer start date on the Basic details screen. These have now all been corrected. Through reviewing these records we suspect that there are 31 records that are potential missing leavers based on the fact that no pension contributions have been posted to the records in the last few years. These 31 records will be picked up with the other Missing Leaver work stream.
Work stream 3 - Missing Member Status – 100% complete
85 records were identified as having an impossible sequence of status changes on Altair, such as a change in status after the member was deceased on Altair.
Work stream 14 - Multiple NI Numbers – Different Dates of Birth – 100% complete
334 records identified as showing the same NI Number for multiple records but with differing Dates of Birth so the suspicion would be that they could potentially be different individuals with the same NI Number in error. All of these records have been reviewed and amendments have been made to 30 records where we believed that and error had been made |

1.5	1	Data Cleansing Project following move to LPP Phases 2 and 3	Scheme Manager supported by: a) The Pensions Board b) Chief Finance Officer c) Head of Finance d) Pension Manager e) Brent Pensions Team f) The LPP (Shared Agreement)	Ensuring a plan is put in place to implement Phases 2 and 3 of the Data Cleanse Project described above	As at 01/12/2018 Active Members (6860) Deferred Members (8196) Pensioners Dependants Frozen Refunds Total of the above (7565)	Common and Scheme Specific Data. "Nice to Have" Updates in Phase 2 Non-Critical Data	As above	LBB Data Cleanse Project Phase 1	LPP Dedicated Project Team assigned to project Status reports are provided to LBB on a monthly basis and discussed at month contract performance meetings. Updates are reported to the Pension Board on a quarterly basis	June 2019 - December 2019	No Update as Phase one of the project is outstanding - it is expected to be delivered on time.
1.6	2	Member Communication Strategy	Scheme Manager supported by: a) The Pensions Board b) Chief Finance Officer c) Head of Finance d) Pension Manager e) Brent Pensions Team f) The LPP (Shared Agreement)	Ensure Member Data is up to date to facilitate communication with members Establish a schedule for communications sent out and monitor these Mechanisms put in place to gauge the effectiveness of member communications	As at 01/12/2018 Active Members (6860) Deferred Members (8196) Pensioners Dependants Frozen Refunds Total of the above (7565)	Common Data Scheme Specific Data	As a new Member Communications Strategy is being implemented, it is important to monitor its development and progress early in the process in order to document any issues and agree relevant action points	Brent Pensions and Finance teams availability given year-end deadlines.	Brent Finance Team Brent Pensions team The outcome will be presented at the March 2019 Pensions board meeting for approval	March 2019 - December 2019	Planned to be delivered by March 2019 and presented to the Pension Board for approval
1.7	2	Decision Log	Scheme Manager supported by: a) The Pensions Board b) Chief Finance Officer c) Head of Finance d) Pension Manager e) Brent Pensions Team f) The LPP (Shared Agreement)	Log to record day to day decisions in order to ensure a full audit trail exists	As at 01/12/2018 Active Members (6860) Deferred Members (8196) Pensioners Dependants Frozen Refunds Total of the above (7565)	Common Data Scheme Specific Data	A register of all day-to-day decisions, not covered in the Pension Board Meeting Minutes ensuring a full audit trail	Decisions will be reported to the Pensions Board	Brent Finance Team Brent Pensions team The outcome will be presented at the March 2019 Pensions board meeting for approval	February 2019 - December 2019	Implemented, saved on a central location on the LBB shared drive