



Local Government Pension Scheme  
Record Keeping Plan  
November 2017



Human Resources

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## 1. INTRODUCTION

- 1.1 This document provides information on London Borough of Brent Pension Fund record keeping plan to comply with the Pensions Regulator's (TPR) record keeping guidance.

## 2. BACKGROUND

- 2.1 In June 2010 TPR published record-keeping guidance with a view of improving industrywide pension scheme data. The guidance sets out a number of minimum requirements all pension schemes must meet in order to demonstrate good levels of understanding and adherence in ensuring the upkeep of suitable data.
- 2.2 Present and accurate pension scheme data is critical for the smooth running of a pension scheme to identify members and accurately calculate member benefits. Maintaining good quality data is also a basic fiduciary duty of trustees and is enshrined in law.
- 2.3 The guidance looks to address data categorized in two ways – Common data and Conditional data – and for the different data types they set out a number of minimum requirements that need to be met:

## 3. COMMON DATA

- 3.1 There are 11 key data items used to identify the scheme membership that are common to all pension schemes. These items are essential to the confirmation of the member's identity and are common to all scheme. The Common Data items are: National Insurance number, surname, forename and/or initials, gender, date of birth, date pensionable service started, expected retirement date, membership status, last status event, address and postcode.

Data analysis must be undertaken on at least an annual basis

- All data must be present for 95% of 'Legacy' members (those who have not had data changes since 2010)
  - All data must be present for 100% of 'New' members (those who have had data changes since 2010)
  - A plan must be in place to address data issues where a scheme is falling below the above prescribed targets
  - The Accuracy of data must be tested, not just the presence of data
- 3.2 Our pension administrators, Capita have run their Coredata™ Essentials analysis and have assessed the overall presence of Brent Council Common data against TPR's requirements as follows:

Pension Scheme	Overall Data Presence	
	Legacy	New
London Borough of Brent Pension Scheme	80.11%	94.03%

- 3.3 As the Common data standard for the scheme is below the standards set by TPR the Council will ensure that Common data inaccuracies are corrected immediately in order to bring the Common data items up to the required standard.

Data Item	Number of Errors
National Insurance Number	192
Surname	0
Forename(s) or Initials	189
Gender	0
Date of Birth	7
Date Pensionable Service Started	5
Expected Retirement Date	0
Membership Status	887
Last Status Event	151
<b>Total</b>	<b>1431</b>

Data Item	Number of Errors
Address	2,101
Address Verification	2,101
Postcode Acquisition	664
<b>Total</b>	

- 3.4 Below are the initial solutions Brent Council will take to attempt to rectify any data issues that may have been highlighted in the report supplied by Capita. Should the actions detailed below not be successful then the Council will consider further actions they can undertake to resolve these data issues.

Data Issue	Recommended Action
National Insurance Number (NINO)	Undertake a data capture exercise by writing to members requesting evidence of their NINO or confirmation they have never received one i.e. overseas members.
Surname	Review member back files to locate data and update accordingly
Forename(s) or initials	Review member back files to locate data and update accordingly
Gender	Review member back files to locate data and update accordingly
Date of Birth	Review member back files to locate data and update accordingly
Date Pensionable Service Started	Review member back files to locate data and update accordingly
Expected Retirement Date	Review member back files to locate data and update accordingly
Membership Status	Review member back files to locate data and update accordingly
Last Status Event	Review member back files to locate data and update accordingly

#### 4 Conditional Data

This data consists of all the types of data used to accurately calculate benefits which are conditional to the make-up of each pension scheme. The requirements are:

- Data analysis must be undertaken ‘regularly’
  - Capita have recommended at least every 3 years, or
- No specific target but expectation is quality of data should be high
- A plan must be in place to address data issues where a scheme is falling below the Council’s accepted quality levels

## ACTION PLAN

4.1 Below is the action plan

	Objective	Actions	Owner	Due Date	Milestones
1.	To locate addresses for deferred and current members	Commission an outside organization to provide missing addresses	Head of Employee Services	June 2018	<ul style="list-style-type: none"> <li>• 30 November agree provider</li> <li>• Correction and rectification by 30 June 2018</li> </ul>
2.	Ensure accurate and complete Common Data for all scheme members	Review the common data on an annual basis	Head of Employee Services	Annually in September	<ul style="list-style-type: none"> <li>• Review actions arising from reports</li> </ul>
3.	Annual Benefit Statements	Make annual benefit statements available online for both current and deferred members	Head of Employee Services	December 2018	<ul style="list-style-type: none"> <li>• Launch online ABS for current members by 31 December 2017</li> <li>• Correspond with deferred members regarding future ABS by 31 August 2018</li> </ul>
4.	Common Data Fails	Commission data cleansing and rectification on the issues raised following the report showing common data fails	Head of Employee Services	March 2018	<ul style="list-style-type: none"> <li>• Commission data review by 30 November 2017</li> <li>• Correction and rectification undertaken by 31 March 2018</li> </ul>
5.	Communication	Annual contact with members to remind scheme members of their obligation to keep their	Head of Employee Services	Annually	<ul style="list-style-type: none"> <li>• Newsletters and ABS</li> </ul>