

Timescales and Monitoring Objectives

APPENDIX A

Index	Scheme Data Improvement Plan Activities Timescales Overview	Plan Activities -- Planned Start Date	Plan Activities - Planned Completion Dates	Data Improvement Plan Milestones	Data Improvement Plan Dependencies	Data Improvement Plan Resources	Monitoring	Responsible Parties	Monitoring Method Scheme Improvement Plan	Success criteria	Status
3.1	November 2017 to March 2018 -- Planned timescale to improve scheme common data is 31/03/2018. Brent have commissioned Capita to obtain the common data that we require. Brent have requested Capita to supply details of the addresses for members for whom we do not hold a valid address for. This will be supplied to a specialist tracing organisation to locate the addresses, for the scheme administrator to update member records accordingly. Participating Employers to provide any data as requested, all administration systems to be updated by 31/03/2018 or sooner.	01/11/2017	31/03/2018	November 2017 --Start of implementation of our record keeping plan.	Ongoing issuing of benefits statements.	Separately managed projects, common address project with additional budget and resources, Capita resources.	Record Keeping Plan. To monitor scheme data going forward with improved procedures and planned monitoring.	Scheme Manager supported by the Board, Chief Finance Officer, Head of Finance, Pension Manager.	Index No. 3.1, 3.2, 3.3, 3.4, 3.5. Data improvement monitoring plan to cover all data improvement work, monitored by Scheme Manager and Pension Board, CFO, HOF, Pension Manager for progress and compliance, each stage to be signed off by responsible person (CFO HOF) Index No. 3.2. Replies back from participating employers of their duties and their plan to send missing or incomplete data to our pension scheme administrators. Weekly and Monthly review of the scheme data improvement plan with adhoc meeting with Capita as required.	1. Index 3.1, 3.2, 3.3, 3.4. Completed by 31/03/2018, with all common data obtained. 2. Index 3.1, 3.2, 3.3, 3.4. Administration systems updated by 31/03/2018. 3. Index 3.1, 3.2. Participating Employer provided data by end of January 2016.	1. Ongoing. 2. Ongoing. 3. Ongoing
3.2	January 2018 -- Commissioning tracing from companies that can provide common data, third party administrators Capita to search member records, scheme administrator Capita to obtaining national Insurance numbers, communications sent to participating employers advising them of their legal duties and to provided complete information to our pension administrators by the end of January 2018.	01/11/2017	31/03/2018	November 2017 -- Commissioned scheme administrators Capita to locate missing common data. Commissioned a specialist tracing organisation to locate the addresses, for the scheme administrator Capita to update member records accordingly.	The move to a new pension scheme administrator October 2018	Companies that search for and provide the data required.	Internal meetings as required to review progress of the plan, Capita resources.	Scheme Manager supported by the Board, Chief Finance Officer, Head of Finance, Pension Manager.	Index No. 3.1, 3.2, 3.4. Weekly and Monthly review of the scheme data improvement plan with adhoc meeting with Capita as required.	1. Index 3.1, 3.2, Commissioned tracing 2. Index 3.1,3.2. Capita search records 3. Index 3.1, 3.2. Capita obtain NINO's 4. Index 3.1, 3.2. Communication sent to Participating Employers 5. Index 3.2. Participating Employer send data to Capita	1. Done. 2. Ongoing. 3. Not done. 4. Not done 5. Not done.
3.3	February 2018 -- Scheme administrator Capita to update their system with data provided from the commissioning of missing common data, data found in scheme member records or other sources that they hold or have access to, data from participating employers.	01/01/2018	28/02/2018	Bulk address tracing to begin January 2018. Identify members where we may not have received a leaver notification.	Re enrolment in 2019.		Monthly meeting with scheme administrators to discuss the plan, standing item contract review meeting	Scheme Manager supported by the Board, Chief Finance Officer, Head of Finance, Pension Manager	Index No. 3.1, 3.2, 3.3. Weekly and Monthly review of the scheme data improvement plan with adhoc meeting with Capita as required	1. Capita update systems 2. From Scheme Records 3. From Participating Employer	1. Ongoing. 2. Ongoing. 3. Not done.
3.4	March 2018 -- All data will have been updated, any issues identified to be covered in an updated scheme data improvement plan to deal with these issues.	01/01/2018	31/01/2018	January 2018 -- Letters sent to participating employers advising them of their legal responsibilities and to provide the data requested by our pension administrators in a timely and accurate manner.	Fund Valuation - Tri Annual 31/03/2019.	Pension team at Brent Council.	Internal meeting to review and sign off parts of the plan completed.	Scheme Manager supported by the Board, Chief Finance Officer, Head of Finance, Pension Manager.	Index No. 3.4. Weekly and Monthly review of the scheme data improvement plan with ad hoc meeting with Capita as required.	1. All Data Updated 2. Issued identified that need further action	1. Ongoing 2. Not yet reached. All reviewed weekly and monthly on the monitoring plan.

3.5	April 2018 -- Review scheme data improvement plan for what has been achieved and what further action to be taken if required.	01/02/2018	28/02/2018	Employer "Engagement Day" and "Forum" to cover statutory responsibilities, a presentation from scheme administrators Capita who will be doing a talk on recording keeping.	Ongoing issuing of benefits statements, The move to a new pension scheme administrator October 2018, Re enrolment in 2019, Fund Valuation - Tri Annual 31/03/2019, member communications, online portals.	An addition interim member of staff to cover this period.	Add hoc meeting with Capita as required.	Scheme Manager supported by the Board, Chief Finance Officer, Head of Finance, Pension Manager.	Review progress from outsourced data providers.	1. Review scheme data plan	1. Not yet reached.
3.6	October 2018 - 2020 -- The plan also includes longer term plans facilitated by the move to the new administrators, including self-service and greater use of technology to improve services. It is also intended to engage with employers on a regular basis to ensure compliance with the regulations regarding their data.	01/10/2018	TBC	1. Annual benefit statements for active and deferred's available online 2. Move away from Annual end of year to monthly updates 3. Online access for employers to upload data with automated validation checks. 4. Review and update of Pension Administration Strategy 5. Review of discretionary policies		LPP and Brent pensions administration team from October 2018.	Actions to be built into monthly contract meeting with LPP, ensuring they are captured in Key Performance Indicators.	Scheme Manager supported by the Board, Chief Finance Officer, Head of Finance, Pension Manager.	Review progress with LPP as part of contractual monthly meetings.	1. 100% ABS on time 2. ABS sent out quicker. Opportunity to identify data issues much earlier 3. Self validation to prevent errors 4. PAS strategy reviewed and signed off by the Pensions Board March 2019 5. Annual review of policies	Will be engaging with new third party administrator LPP from October 2018 to deliver these actions.