

**WIRRAL COUNCIL**

**PENSIONS BOARD**

**10 OCTOBER 2017**

<b>SUBJECT:</b>	<b>PENSION ADMINISTRATION - RECORDS MANAGEMENT &amp; DATA IMPROVEMENT POLICY</b>
<b>WARD/S AFFECTED:</b>	<b>NONE</b>
<b>REPORT OF:</b>	<b>PRINCIPAL PENSIONS OFFICER</b>
<b>KEY DECISION?</b>	<b>NO</b>

**1.0 EXECUTIVE SUMMARY**

- 1.1 The purpose of the report is to update Pension Board of the introduction of a records management and data improvement policy for the Pension Administration section.
- 1.2 It provides a transparent framework in regard to the processes and responsibilities in approaching data quality and demonstrates the Fund's commitment to embed proactive and preventative techniques within its business practice - to achieve a continual programme of data improvement.

**2.0 Background and Overview**

**The Pensions Regulator – Code of Practice No.14**

- 2.1 The Pension Regulator's (TPR) Code of Practice 14 and the Public Service Pensions (Record Keeping & Miscellaneous Amendments) Regulations 2014 set out the requirements for public sector pension funds to maintain comprehensive and accurate data on member pension transactions.
- 2.2 Fund Officers have always placed the attainment of good quality data high on its list of priorities. However, the importance of data quality has been heightened recently following the findings of the TPR's public sector survey; along with their assertions on the need for improvements to record keeping and member communications.
- 2.3 The forthcoming changes in Data Protection legislation also exacerbate the level of scrutiny with regard to an organisation's statutory responsibility to ensure the lawful recording and processing of personal member data.

### **Progress on Data Quality**

- 2.4 The board has been apprised over the previous two years of the activity undertaken by the Fund to resolve poor data quality, along with the outcome of the internal annual assessments of the Fund's compliance against the TPR Code of Practice.
- 2.5 A data improvement plan has been developed to address issues identified as part of the annual contribution return review e.g. missing member data and outstanding leaver documentation.
- 2.6 The team has also refined its 'data mining' processes as a consequence of issues emerging from the 2016 valuation. The objective of the record management policy is to provide a structured, rigorous approach to achieving and maintaining data quality.

### **Compliance**

- 2.7 As the employer base continues to fragment due to outsourcing and academy conversions, along with the increasing complexity of the scheme benefits, data quality, employer engagement and communications is a key focus for the Fund.
- 2.8 To help deliver the data quality programme, in compliance with legal requirements, the Fund's strategic business plan includes a significant investment in IT systems. In addition, the administration team has been restructured to include an Employer & Data Compliance manager and 1.5 FTE Data Analyst posts - with the main remit to implement and monitor the data improvement policy and increase employer engagement.
- 2.9 Officers will continue to support the work of the Pensions Board as it is anticipated that both the Pensions Regulator and Scheme Advisory Board will increase their level of scrutiny in the areas of data quality and member communications.
- 2.10 The Pension Administration Strategy also sets the direction of travel which is aligned to a digital operating environment and reflects the increasing governance requirements in regard to data quality.

### **3.0 Noting Points**

- 3.1 A draft version of the policy is attached as an appendix to the report for the Board's consideration.
- 3.2 Any suggested amendments to the proposed procedures and policy to improve record keeping are welcome before presenting the final draft to the Pension Committee in November 2017

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