

West Northamptonshire Council

Pension Committee

29/6/2022

Mark Whitby – Head of Pensions

Report Title	Northamptonshire Pension Fund Data Improvement Policy and Plan
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Contributors/Checkers/Approvers

MO	Paul Hanson on behalf of Catherine Whitehead	31 May 2022
S151	James Smith on behalf of Martin Henry	8 June 2022
Head of Pensions	Mark Whitby	19 May 2022

List of Appendices

Appendix A – Data Improvement Strategy and Plan

1. Purpose of Report

- 1.1 To present the Committee with the revised Data Improvement Policy and the revised Data Improvement Plan.

2. Executive Summary

- 2.1 The report provides the Pension Committee with reassurance that the Northamptonshire Pension Fund has an adequate Data Improvement Policy and Plan in place to meet the Pensions Regular requirements.

3. Recommendations

- 3.1 The Pension Committee is asked to:
- a) Approve the revised Data Improvement Policy and Plan.

4. Report Background

- 4.1 The Northamptonshire Pension Fund collects and processes large amounts of personal data and is heavily reliant on the timely receipt of accurate data from data providers such as scheme employers and payroll providers.

- 4.2 The primary purpose of the Northamptonshire Pension Fund is to pay the correct pension benefits to its members when they become due. It is therefore essential that the Fund achieves and maintains the highest possible data quality standards.
- 4.3 The Public Service Pension Act 2013 came into effect on 1 April 2014 and increased the powers of the Pensions Regulator to ensure that public service pension schemes had appropriate measures in place to ensure high standards of governance and administration.
- 4.4 The Pensions Regulator articulated these standards through the code of practice 14 – governance and administration of public service pension schemes. The code addresses the need for high standards of accurate data and states that schemes must regularly review the data held and put in place a Data Improvement Plan to address any issues.
- 4.5 Responses to a consultation on a new code of practice to replace code of practice 14 are currently being reviewed by the Pensions Regulator (TRP).
- 4.6 To demonstrate TPR that the Fund has reviewed the quality of its data and has an ongoing approach to ensuring the Fund has appropriate processes in place to consistently hold accurate data, a Data Improvement Policy and a Data Improvement Plan were put in place in October 2018.
- 4.7 The Policy was reviewed and updated in 2020 and a revised Policy approved by the Pension Committee at its meeting of 11 December 2020.
- 4.8 Since this date the Fund has been annually reviewing its data quality through a TPR data scoring exercise and undertaking data improvements in line with any quality issues identified.

5. Issues

5.1 Data Improvement Strategy & Plan – Revisions

- 5.1.1 A completely revised Data Improvement Strategy & Plan has been drafted by Fund officers to replace the existing Policy. This is included in Appendix A.
- 5.1.2 The new Strategy sets out the processes by which we obtain and maintain good quality data and the cyclical data review activities undertaken by Fund officers. The Plan contains the current areas of focus for the Fund with regards to data improvement. A revised plan will be formulated at least annually to meet the code of practice requirement to continually review data held and carry out a review exercise at least once a year.

6 Implications (including financial implications)

6.1 Resources and Financial

- 6.1.1 The costs incurred in conducting data quality reviews and the associated rectification work will be met by the administration budget. Rectification work will be carried out by officers of the Fund where possible and efficient to do so.

6.2 Legal

- 6.2.1 There are no legal implications connected to the contents of this report as by putting in place a Data Improvement Policy and Data Improvement Plan, compliance with the Pensions Regulator’s code of practice is being achieved.

6.3 Risk

6.3.1 The Northamptonshire Pension Fund is required under various sets of legislation and the Pensions Regulator code of practice to ensure that data held on scheme members and their potential beneficiaries is up to date and accurate. As such the Fund should have in place an approach to managing the quality of its data and a plan for addressing any omissions or inaccuracies. This report presents a strategy and plan to the Pension Committee to demonstrate compliance and commitment in this area.

6.3.2 The risks associated with the Fund not having in place a Data Improvement Strategy and Plan have been captured in the Fund's risk register as detailed below.

Risk	Residual risk rating
Information may not be provided to stakeholders as required	Green
Those charged with governance are unable to fulfil their responsibilities effectively.	Green
Risk of fraud and error.	Green
Incorrect/poor quality data held on the Pension Administration and Payroll platforms or delays with receiving information leading to incorrect information/delayed provision of information to members and stakeholders	Green
Failure to administer the scheme in line with regulations and guidance	Green

6.3.3 The Fund's full risk register can be found on the Fund's website at the following link:
[Northamptonshire Risk Register](#)

6.4 Relevant Pension Fund Objectives

6.4.1 The following objectives have been considered in this report -

- To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
- To manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.
- Continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.
- Put in place performance standards for the Fund and its employers and ensure these are monitored and developed as necessary.
- Maintain accurate records and ensure data is protected and used for authorised purposes only.

6.5 Consultation

6.5.1 Not applicable.

7 Background Papers

7.1 Not applicable.