



**London Borough of Hillingdon
Local Government Pension Scheme**

Data Improvement Plan

Live Version

Last Update 17/10/2019

Background

- 1.1 London Borough of Hillingdon is an employer within the London Borough of Hillingdon Local Government Pension Scheme (LGPS) and is also the Administering Authority for the scheme.
- 1.2 Data is used by the Pensions, Treasury and Accounts Team with the day to day administration of Hillingdon LGPS scheme delegated to Surrey County Council (SCC) under a Section 101 agreement effective from 1 November 2016.
- 1.3 Extracts of pension records and specific reports are shared appropriately between Employers (including Admitted and Scheduled bodies), the Hillingdon HR Team, SCC, the funds Actuary Hymans, and the Hillingdon Legal Advisor.
- 1.4 Pension data relating to individuals is shared with the relevant employee and/or their nominated representative as necessary, this includes the production and distribution of the Annual Benefit Statements.
- 1.5 The Pensions Regulator (tPR) regulate the governance and the administration of public sector pensions, the objectives of this plan are designed to comply with the current and future tPR standards and requirements.

2 Objectives

- 2.1 To identify where Hillingdon LGPS pensions data is located, make an assessment of its accuracy, identify any issues which impact on the ability to run the scheme effectively and put plans in place to correct data as required.

3 Desired Outcomes

- 3.1 To improve the data set to deliver:
 - 3.1.1 Improved member service, for example reduced processing times for events such as transfers, the calculation of estimates and the completion of Admission Agreements.
 - 3.1.2 Fewer assumptions having to be made with the valuation data.
 - 3.1.3 Improved and verified data used within Annual Benefit Statements for current and deferred members.
 - 3.1.4 Completion of administrative tasks, for example clearing any backlogs in a timely fashion.
 - 3.1.5 Update documented procedures to reduce the risks of errors recurring.
 - 3.1.6 Compliance to GDPR and other relevant data protection legislation and regulation.
 - 3.1.7 Greater confidence that data is accurate when completing statutory returns

4 Scope and prioritisation.

- 4.1 The data groups in scope for assessment and potentially for improvement work are:
 - 4.1.1 Active member records.
 - 4.1.2 Deferred member records.
 - 4.1.3 Pensioners records.
- 4.2 The data groups that will be given priority are:
 - 4.2.1 Unprocessed leavers (i.e. cases where SCC already have the leavers form).
 - 4.2.2 Unprocessed leavers (i.e. cases where SCC require more information and a leavers form from Hillingdon and or Admitted and Scheduled bodies).
 - 4.2.3 Deferred members where the recalculation of benefits is necessary.

4.2.4 Workflow cases inherited from the previous

administration provider.

4.2.5 Active member's records where data cleansing is assessed as being required.

4.2.6 Pensioners records that have been assessment as being impacted by Guaranteed Minimum Pension (GMP) requirements.

4.2.7 Any record identified via the combined Common and Conditional report as required by the tPR.

5 Dependencies

5.1 The completion of the objectives is dependent upon:

5.1.1 The Hillingdon Pension team project managing the actions required to complete the priorities.

5.1.2 Data extracts being made available to the Hillingdon Pension team from SCC using the Altair Pensions Administration database.

5.1.3 All Employers (including Admitted and Scheduled bodies) responding positively to data queries sent to them in a timely fashion.

5.1.4 SCC verifying (as far as possible) and correcting pension records following the replies from the Employers.

5.1.5 Agreement with Heywoods being reached to supply the combined Common and Conditional report out of Altair.

6 Timeframes and timelines

6.1 It is intended that the current objectives will be completed by 30 October 2020, however this will be a continually evolving view of the Hillingdon data.

6.2 Officer to meet with SCC in October / November to progress a project plan for outstanding issues.

6.3 Aon as Governance Advisers to the Hillingdon Fund to review this plan November /December to identify gaps or areas of weakness for improvement.

6.4 The Pensions Board review this plan at its next meeting 27 November 2019.

6.5 The Pensions Committee to approve this plan at its next meeting on the 29 January 2020.

6.6 Timelines for the individual actions required to complete the objectives are attached as Appendix 1.

7 Resourcing

7.1 The completion of the objectives is dependent upon adequate skilled resources being available from:

7.1.1 The Hillingdon Pension Team.

7.1.2 SCC.

7.1.3 Admitted and Scheduled Bodies.

7.1.4 Actuary (Hymans)

8 Governance and reporting

8.1 This Data Improvement Plan has been proposed and written by the Hillingdon Pension Team with comments requested from the following stakeholders:

8.1.1 SCC.

8.1.2 Hillingdon
Local Pensions
Board.

8.1.3 Actuary (Hymans).

8.2 This Data Improvement Plan will be approved by the Pensions Committee and reviewed and monitored regularly by the Pensions Board.

8.3 Progress with the individual actions will be monitored by the Hillingdon Pensions Team and SCC at their quarterly Liaison meetings.

8.3.1 The SCC team will be responsible for writing the minutes of the liaison meetings and allocating the subsequent actions.

8.3.2 Stakeholders allocated actions will be responsible for the delivery of the agreed action by the agreed target date.

8.4 Progress monitoring reports will be written by the Hillingdon Pension Team and presented to the Pensions Board quarterly and the Pensions Committee twice per year.

9 Fraud Controls to note

9.1 Mortality screening

The Fund carries out monthly mortality screening for all pensioners and last carried out a mortality screen for deferred members in February 2018. Further mortality screening for deferred members will be carried out as part of the address tracing service in 2019.

9.2 Overseas pensioner death certification

Overseas pensioner death certification is carried out every 3 years. SCCC will carry out the first certification under their contract in November 2019.

9.3 NFI

The fund carries out an annual National Fraud Initiative review to identify potential fraud cases of benefits paid



Timelines for individual actions required to complete the objectives

No	Action Area	Activities to resolve Action	Lead	Support	Planned completion date					% Complete
1.	Unprocessed leavers (i.e. cases where SCC already have the leavers form).	See project update in Appendix 4	SCC	Hillingdon						
2.	Unprocessed leavers (i.e. Orbis require more information and a leavers form from Employer HR).	See project update in Appendix 4	Hillingdon	SCC						
3.	Recalculation of existing deferred benefits.		SCC	Hillingdon						
4.	Workflow cases inherited from the previous provider.		SCC	Hillingdon						
5.	2019 Valuation critical errors	Triennial Valuation project. Data cleanse to ensure all critical clear prior to update to Hymans. Data queries sent to employers for resolution prior to valuation submission and ABS production for March 19	SCC	Hillingdon	31 July 2019	<i>Data as at Jan 19</i>	<i>Data as at April 19</i>	<i>Data as at 16 Jul 19</i>	<i>Data as at 26 Jul 19</i>	
5a.	<i>Data Cleansing of active member's records.</i>					1,846	1581	1567	633	
5b.	<i>Data Cleansing of deferred member's records.</i>					195	194	46	34	
5c.	<i>Data Cleansing of pensioner member's records.</i>					1,367	764	384	342	
5d.	<i>Data Cleansing of dependant records.</i>					261	208	161	161	



6.	Guaranteed Minimum Pension (GMP) Reconciliation	GMP reconciliation project initiated June 2018. Project update see Appendix 4.	SCC & JLT	Hillingdon		GMP population 26,263	Matched 28/06/2019 21,845			
7.	Heywood's combined Common and Scheme Specific report	<i>See Appendix 2 for more detail on scoring and prioritisation for improvement areas.</i>				<i>Data as at Nov 2018</i>				
7a.	<i>Address tracing</i>	Project plan in place to carry out member tracing and mortality screening on approximately 2,275 deferred members.	ITM	SCC	31/12/2019	7,496				
7b.	<i>Member benefits - Transfer in details 1</i>					1,913				
7c.	<i>Member benefits - Tranches of Original deferred benefit</i>					1,461				
7d.	<i>Members Details – Salary</i>					2,861				
7e.	<i>CARE Data</i>					2,064				
7f.	<i>Contracted Out - NI Contributions / Earnings History</i>					1,054				
7g.	<i>Contracted Out - Pre 88 GMP</i>					663				
7h.	<i>Contracted Out - Post 88 GMP</i>					1,132				



Summary of Common Data Results November 2018

79.0% of member records do not have a single common data failure.

Data Area	Pass rate	Cases with errors	Focus areas
NI number	95.5%	2,144	Amber
Name	100.0%	0	Green
Sex & DOB	100.0%	2	Green
Date Commenced and NRD	100.0%	1	Green
Status	100.0%	0	Green
Status & Invalid Data View	99.8%	121	Amber
Address	84.4%	7,496	Red
Status & Valid Data View	99.3%	352	Amber

Summary of Scheme Specific Data Results November 2018

79.9% of member records do not have a single scheme-specific data failure.

Data Area	Pass rate	Cases with errors	Focus areas
Member Benefits	86.4%		
<i>Divorce details</i>	100.0%	0	Green
<i>Transfer in details 1</i>	28.5%	1,913	Red
<i>Transfer in details 2</i>	84.6%	411	Amber
<i>AVC details</i>	99.7%	4	Amber
<i>Total Original Deferred Benefit</i>	96.5%	245	Amber
<i>Tranches of Original deferred benefit</i>	79.0%	1,461	Red
<i>Total Gross Pension</i>	99.8%	13	Amber
<i>Tranches of Pension</i>	91.9%	469	Amber
<i>Total Gross Dependant Pension</i>	99.4%	6	Amber
<i>Tranches of Dependant Pension</i>	86.4%	129	Amber
Member Details	96.9%		
<i>Date of Leaving</i>	99.9%	18	Amber
<i>Date joined scheme</i>	100.0%	1	Green
<i>Employer details</i>	100.0%	1	Green
<i>Salary</i>	87.6%	2,861	Red
<i>Contributions</i>	92.0%	1,997	Amber
<i>Leavers</i>	99.8%	30	Amber
<i>Service</i>	99.8%	56	Amber
CARE Benefits	85.0%		
<i>CARE Data</i>	85.0%	2,064	Red
<i>CARE Revaluation</i>	100%	0	Green
HMRC	97.1%		
<i>BCE 2</i>	100.0%	1	Green
<i>BCE 5</i>	100.0%	2	Green
<i>BCE 6</i>	96.2%	122	Amber
<i>BCE7</i>	37.5%	5	Amber
<i>BCE8</i>	100.0%	0	Green
<i>LTA Charge Paid</i>	99.9%	4	Amber
<i>AA Charge</i>	93.3%	624	Amber
Contracted Out	91.0%		
<i>Date Contracted Out</i>	97.2%	682	Amber
<i>NI Contributions / Earnings History</i>	82.8%	1,054	Red
<i>Pre 88 GMP</i>	80.2%	663	Red
<i>Post 88 GMP</i>	78.9%	1,132	Red

Note

Focus area of **Red** if % less than 90% **and** over 500 cases impacted.

Planned projects

A project has been initiated in October 2019 to commence work in tracing approximately 2,275 deferred members. Appointment has been made to ITM to carry out the project with Planned completion date of 31/12/2019.



Status 2 Project details and progress

Backlog Status 2 Number at project outset
2439

Progress

Progress date	Cases Sent to JLT	Cases to be processed	Case sent for internal query	Case queried passed to client	Cases Processed (Waiting to be checked)	Cases checked & Completed
07/06/2019	1352	768	n/a	n/a	557	27
06/07/2019	1826	292	133	614	307	480
12/07/2019	1940	143	215	606	212	764
19/07/2019	2028	58	119	666	246	939
02/08/2019	2124	20	42	686	122	1254
09/08/2019	2124	1	50	692	35	1346
23/08/2019	2122	1	45	657	3	1250
30/08/2019	2122	0	78	591	2	1290
06/09/2019	2122	3	86	553	23	1318
13/09/2019	2122	4	88	547	22	1323
20/09/2019	2122	4	94	543	7	1329



GMP Project and progress update

GMP Rec Population
26,263

Executive Summary

- 1 Data Gathering commenced. We have 9 resource lined up to complete the gathering as far as possible within the timeframe we have left with HMRC, so will concentrate our efforts on the completion of the Membership data gathering that will have the most impact on the overall Fund liability.
- 2 Initial Query logs have been uploaded
- 3 HMRC turnaround times are currently 4 months.

Tasks Completed

- 1 All initial Phase 1 analysis completed
- 2 Bulk analysis has been completed
- 4 Data gathering continues and moves cases from one category to another although doesn't affect totals

Next Steps

- 1 Continue data gathering on all unresolved cases
- 2 Data gathering on GMP discrepancies
- 4 Client Referrals - decisions requiring Client guidance

Next Update

- 1 28/06/2019
- 2 All current client referral files have been returned
- 3 We are continuing to data gather, and are now closer to matching or querying with you remaining records
- 4 HMRC have returned many responses and we are currently working through them
- 5 Decisions made at the workshop will close off a number of cases going forward

Date	Matched	Not on NISPI	Not on Admin	NISPI Type 5&7's	Multiple Service	GMP Queries
20/09/2018	12,422	4,286	567	262	2,679	
05/10/2018	14,517	4,286	567	3	2,679	
31/10/2018	13,438	4,286	567	3	2,679	1,089
23/11/2018	16,646	4,286	567	3	2,679	1,089
10/12/2018	16,646	4,286	567	3	2,679	1,089
20/12/2018	16,646	4,286	567	3	2,679	975
10/01/2019	16,646	4,286	567	3	3,070	975
24/01/2019	16,646	4,286	1,141	3	3,070	975
08/02/2019	16,646	4,286	1,141	3	3,070	969
22/02/2019	16,888	4,286	1,141	4	3,070	969
08/03/2019	16,888	4,286	948	4	3,070	969
22/03/2019	16,888	4,286	949	4	2,162	969
05/04/2019	16,969	4,268	848	0	2,162	868
18/04/2019	17,818	3,485	848	0	2,179	828
03/05/2019	17,865	3,485	827	0	2,231	828
17/05/2019	19,664	1,919	500	37	449	842
31/05/2019	20,602	1,024	260	3	238	858
14/06/2019	21,001	1,013	260	3	235	932
28/06/2019	21,845	293	262	3	240	939
31/07/2019	22,310	278	58	3	4	956

Summary position 31/07/2019

Total Population
26,263. To
resolve 1,299.



True Membership issues - NOA, NON, Multiple, NISPI Type 5/7 – 343 – 1.31% outstanding

True GMP Discrepancies – 956 - 3.64% outstanding

