

Meeting:	Pension Board
Date:	03/11/2025
Title:	Data Improvement Plan
Author:	Meirion Jones, Pensions Manager
Purpose:	For information and discussion

1. Purpose of the Report

This report provides an overview of the proposed Data Improvement Plan for the pension fund. It outlines key objectives, current data challenges, planned actions, and expected outcomes. The aim is to ensure the Board is informed of the approach and can provide feedback or endorsement where appropriate.

2. Background

Accurate and complete data is critical to the effective administration of the pension scheme, compliance with regulatory requirements, and delivery of high-quality member services. Recent reviews and audits have identified areas where data quality requires improvement, particularly in relation to common and scheme-specific data.

3. Objectives of the Data Improvement Plan

- Improve the accuracy, completeness, and timeliness of member data
- Ensure compliance with The Pensions Regulator's expectations
- Support effective decision-making and risk management
- Enhance member experience and reduce administrative errors
- Prepare for future projects such as dashboard readiness and scheme valuations

4. Recommendation

The Board is asked to:

- Note the contents of the Data Improvement Plan
- Provide feedback on the proposed approach
- Endorse the plan's implementation and monitoring framework



Cronfa Bensiwn **GWYNEDD** Pension Fund

Data Improvement Plan

1. Executive Summary

Accurate and complete data is critical to the effective administration of the Gwynedd Pension Fund. It ensures members receive the correct benefits promptly, supports compliance with regulatory requirements, and facilitates clear communication with employers and members.

This Data Improvement Plan outlines the Fund's strategic approach to identifying and addressing data quality issues, focusing on improving both Common and Scheme-Specific data in line with standards set by The Pensions Regulator (TPR).

Key priorities include cleansing inaccurate records, enhancing employer data submissions, reconnecting with deferred members, and preparing for the Pensions Dashboard Programme. Progress will be tracked against clear milestones and deadlines, with oversight provided by the Local Pension Board and Pension Committee to ensure accountability.

The Fund is committed to maintaining high data standards to support long-term scheme efficiency, regulatory compliance, and member confidence.

2. Introduction

Accurate, complete, and timely data is the foundation of effective pension administration. High-quality data is essential not only for meeting regulatory requirements but also for providing reliable services to scheme members and employers. Maintaining excellent data reduces manual interventions, minimises the risk of errors, protects against fraud, and builds trust among all stakeholders.

This Data Improvement Plan details the key data types maintained by the Fund, highlights the importance of data accuracy, and outlines a clear, structured approach to enhancing data quality. Maintaining high data standards supports:

- The accurate and timely payment of member benefits.
- Compliance with regulatory requirements, including The Pensions Regulator's standards and the McCloud remedy.
- Preparation for the Pension Dashboard Programme, which will enable members to view all their pension entitlements in one place.
- Precise actuarial valuations and funding calculations.
- Building and sustaining confidence with employers and members.

This plan represents an ongoing commitment to data excellence and effective pension fund governance, rather than a one-off exercise.

3. Objectives

The Fund's data improvement objectives are to:

- Proactively identify and correct errors affecting member records.
- Achieve and maintain full compliance with The Pensions Regulator's record-keeping requirements.
- Support the implementation of regulatory changes, including the McCloud remedy and Pension Dashboard connection.
- Foster a culture of continuous data improvement within the Fund and across all employers.
- Enhance data accuracy and auditability through process redesign and system improvements.

4. Data Types and Their Importance

High-quality data across the following categories is essential to the accurate administration of the Gwynedd Pension Fund:

- **Member Personal Details:** Includes name, date of birth, and National Insurance number. Accurate personal data prevents duplicate records, ensures correct member identification, and supports precise pension calculations.
- **Contact Information:** Current addresses, emails, and phone numbers enable timely delivery of benefit statements, newsletters, and other communications, enhancing member engagement and compliance.
- **Employment and Service Records:** Information on employers, employment start and end dates, and employment status ensures correct pension accrual and contribution tracking.
- **Contributions and Payroll Data:** Accurate recording of pensionable pay, contribution rates, and employer payments protects members' entitlements and ensures correct benefit levels.
- **Bank and Payment Details:** Up-to-date bank information ensures pension payments are made promptly and securely.
- **Dependents and Beneficiary Information:** Current records of nominated beneficiaries guarantee death-in-service and survivor benefits are paid to the correct individuals.
- **Compliance and Audit Trails:** Comprehensive logging of data changes, authorisations, and access supports governance, regulatory compliance, and risk management.

Maintaining data quality across all these areas safeguards member rights, supports operational efficiency, and reinforces trust in the Fund's governance.

5. The Pension Regulator Requirements

The Pensions Regulator (TPR) requires pension schemes to report annual data quality scores for both common and scheme-specific data.

- **Common Data** includes core member identifiers such as National Insurance number, full name, gender, date of birth, address (including postcode), and member status.
- **Scheme-Specific Data** covers LGPS-specific information such as employer details, salary, service history, CARE pay, AVCs, GMP data, and benefit crystallisation events.

This plan outlines the steps the Gwynedd Pension Fund will take to improve data quality,

focusing on meeting and exceeding TPR's data score standards. High-quality data is essential for accurate benefit calculations, effective communication, and regulatory compliance.

6. Current Data Quality Assessment

The Gwynedd Pension Fund conducts regular data quality assessments to ensure ongoing compliance with TPR's record-keeping standards and to monitor data integrity.

To support this, the Fund uses Heywood's Insights tool—a specialist analytics solution designed to assess both Common and Scheme-Specific data. This tool identifies gaps, inconsistencies, and errors in member records with a high degree of accuracy and tracks improvements over time.

Data Categories Assessed

As defined by TPR, the data is categorised as:

- **Common Data:** Key identifiers such as name, date of birth, National Insurance number, gender, address, and status.
- **Scheme-Specific Data:** LGPS-specific details including employer information, salary, service history, CARE pay, AVCs, GMP data, and benefit crystallisation events.

Most Recent Assessment

The latest data quality assessment, completed using Heywood's Insights tool in October 2025, shows the Fund's current data scores as follows:

- **Common Data Score:** 97.3%
- **Scheme-Specific Data Score:** 96.95%

These scores represent the percentage of member records that are complete and accurate, based on the validation rules within the Insights tool.

The results have informed the targeted actions detailed in Section 7, focusing on data items with the greatest impact on benefit calculations, member communications, and regulatory reporting.

The Fund will continue to use Heywood's Insights tool to monitor progress and ensure measurable improvements year on year.

7. Targeted Actions

Based on the latest assessment conducted via Heywood's Insights tool, the Fund has prioritised several key areas for targeted data improvement. These actions focus on enhancing the accuracy of benefit calculations, member communications, and readiness for regulatory changes such as the McCloud remedy and Pension Dashboard Programme.

Key Priorities

- Correcting missing or invalid data entries (e.g., temporary National Insurance numbers, incomplete addresses).
- Addressing scheme-specific data issues related to service history, transfers, GMP data, and benefit tranches.

- Reconnecting with deferred members whose contact details are no longer valid.
- Collaborating closely with employers to improve the accuracy and timeliness of monthly data submissions.
- Develop and monitor exception reports that highlight common data entry errors in the system.
- Undertake regular mortality screening for deferred and pensioner members to ensure records remain accurate.

Approach

Each identified data issue has been assessed and assigned corrective actions, timelines, and responsibilities. The Fund prioritises issues with direct impact on member benefit calculations and payments.

Progress will be monitored through internal reviews, ongoing employer engagement, and follow-up data validation using Heywood's Insights tool. Where necessary, professional tracing services and third-party support will be used to resolve complex cases.

The areas that we will focus on in 2025-26 are:

Common Data

Data Issue	Number of cases	Action	Due to be completed	Status
Member has Temporary NI Number	22	Contact members to request NI Number	31-12-2025	On-going
Gone away indicator on members record	867	Trace member's address	31-12-2025	On-going

Note: The Fund relies on members to update their contact details, which can be challenging, especially for deferred members. The introduction of the Pensions Dashboard is expected to improve member reconnection. Meanwhile, professional tracing services are employed to locate members with outdated contact information.

Scheme Specific

Data Issue	Number of cases	Action	Due to be completed	Status
Divorce Details Payment date or Pension Debit is missing	1	Update Divorce details	31/03/2026	On-going
Transfer in details Date received is blank or Transfer value is blank (only for Actives/ undecided leavers and deferred missing)	107	Update transfer details	31/03/2026	On-going
Tranches of Original Deferred Benefit Initial Pension for Deferred member is less than £1	108	Check records to ensure pension amounts are correct	31/03/2026	On-going
Tranches of Pension CARE Pension less than £1 and Pension Increase date earlier than PI Calculation date	25	Check records to ensure CARE pension is correct and check Pension Increase dates	31/03/2026	On-going

Total Original deferred Benefits Value missing in Initial Pension	5	Update Deferred Benefit data view	31/03/2026	On-going
CARE Data CARE Data missing for certain years	22	Check records. Some may be genuine cases, where the member is casual and has not had CARE Data for certain years.	31/03/2026	On-going
BCE2 Crystallisation date is not a valid date or is earlier than date left	2	Update Crystallisation date	31/03/2026	On-going
BCE6 Crystallisation date is not a valid date or is earlier than date left	661	Update Crystallisation date	31/03/2026	On-going
NI Contributions/ Earnings History Missing NI Contributions/ Earnings History	6,237	Update NI Contributions/ Earnings History	31/03/2026	On-going
Pre88 GMP Pre88 GMP Missing	80	Update Pre88 GMP	31/03/2026	On-going
Post88 GMP Post88 GMP Missing	393	Update Post88 GMP	31/03/2026	On-going

8. Governance and Oversight

Successful implementation of this Data Improvement Plan depends on clear governance and accountability:

- **Pensions Manager:** Provides strategic oversight of data improvement activities.
- **Systems Team Leader:** Leads day-to-day delivery of corrective actions.
- **Employers:** Responsible for submitting accurate and timely data via monthly returns.
- **Local Pension Board and Pension Committee:** Provide independent oversight, challenge, and monitor data quality performance.

Regular progress updates will be presented to the Local Pension Board and incorporated into annual governance reporting to ensure transparency and accountability.

9. Employer Engagement

Employers are vital partners in maintaining high-quality data, as they provide the primary source of member information.

The Fund's Employer Engagement Strategy focuses on collaboration through:

- Monthly data submissions via online platform (i-Connect).
- Regular error reporting and annual data quality scorecards.
- Tailored training sessions and one-to-one support.
- Monitoring employer data performance and escalating persistent issues when necessary.

This approach ensures employers are supported in meeting their responsibilities while reinforcing the importance of accurate, timely member records.

10. Review and Continuous Improvement

The Fund is committed to continuous review and enhancement of data quality processes:

- The Data Improvement Plan will be reviewed annually to ensure effectiveness.
- Updates will be made to address emerging challenges and leverage new opportunities.
- Feedback will be actively sought from stakeholders to refine data management practices.

11. Conclusion

By following this plan, the Gwynedd Pension Fund aims to significantly enhance data quality, ensuring compliance with regulatory requirements and improving the overall experience for members and employers.

12. Contact Information

For any questions or further information about the data improvement plan, please contact:

- Pension Fund Manager: Meirion Jones - MeirionJones2@gwynedd.llyw.cymru
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