



Data Improvement Strategy and Plan 2025-2027

Approved by Pensions Committee xxxx





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Introduction

This document outlines the key issues identified in the fund's annual Data Quality review of 2025 and the steps the fund will take to address these issues over the next two years. The plan aims to ensure the accuracy and completeness of member records, improve data quality scores, and prepare for the Government's Pensions Dashboard programme live launch to the public. It includes specific objectives, such as maintaining accurate member records, rectifying data gaps including missing addresses, and reducing the number of historical Deferred Refund records.

The Fund exists to pay pension benefits to beneficiaries when these benefits fall due. To achieve this, data must be received in a timely manner and maintained to the highest possible quality standards. This data quality is also the basis for Fund valuations and effective decision-making. The maintenance of high-quality data is increasingly difficult due to the volume and diversity of the Fund's data providers (e.g. scheme employers and payroll providers) and the increasing complexity of the Scheme's benefit design.

Legislative Framework

The regulations, standards, and guidance that the Fund must comply with includes:

LGPS Regulations 2013, as amended:

- Public Service Pensions (Record Keeping and Miscellaneous Amendments)

Regulations 2014:

- The Pensions Act 1995, 2004 and 2008;
- The Occupational and Personal Pension Schemes (Disclosure of Information)

Regulations 2013:

- Data Protection Act 2018;
- Freedom of Information Act 2000;
- Pension Regulator's Code of Practice No.14



The Pension Regulator's Code of Practice 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. Failure to maintain accurate records can put the Fund at risk of failing to meet its legal obligations which could result in enforcement action from the Pensions Regulator and therefore legal and reputational harm.

Obtaining excellent data

The following are the approaches that the Fund uses to ensure that high quality data is received from employers, and that the accuracy of that data is maintained during processing by the Fund.

Administration Strategy — The Fund has put in place an Administration Strategy that sets out the responsibilities and required performance standards for both scheme employers and the administering authority. This includes the requirement of the scheme employer to provide accurate and timely data to the Fund.

Scheme employer support — The Fund is reliant upon the accuracy, completeness, and timeliness of data provision from scheme employers and payroll providers. The Fund will provide support to scheme employers including newsletters, website, employer meetings, and virtual face-to-face training sessions where necessary.

Clear data submission templates and forms — The data requirements of the Fund are complex due to the inherent nature of the scheme. The Fund work closely with employers to ensure that data is submitted clearly and timely. The Fund work hard to ensure that data request forms are as straightforward as possible and processes are reviewed regularly.

All scheme employers provide data monthly through the iConnect facility.

Effective internal controls and processes — The Fund's control processes are subject to annual review by internal audit and any management actions required in connection with recommendations for improvement are monitored through to completion.

Fund staff must undertake mandatory e-learning modules on protecting personal data and information governance. Staff are granted the appropriate level of system access to fulfil their duties and that access is withdrawn upon the member of staff leaving the team. This minimises the risk of accidental loss, errors, and unauthorised activity.



Actions to ensure that any data being created or updated is accurate include:

- Ensuring clear and up-to-date workflow processes exist, are documented and are being followed
- The Altair pensions administration and payroll system is upgraded when required
- All 'known errors' reported by the software supplier are communicated to relevant parties
- Regularly reviewing data being processed and making recommendations for improvement
- Reporting of any scheme employer data quality issues and appropriate management of these issues in line with the Administration Strategy
- **Timely receipt and processing of data** — The Fund will process data received from data providers in a timely manner and ensure that appropriate skilled resource is in place to reduce the risks of backlogs building up. Should backlogs arise a plan will put in place to reduce volumes to business-as-usual levels.

Data cleansing is undertaken at year-end, at each triennial valuation and before any benefits are put into payment. This is to check the accuracy of the pay and other data provided by employers.

The Fund's performance standards are set out in its Administration Strategy. The legislative framework set out above includes required standards associated with numerous casework processes that are reliant on accurate and timely employer data.

The Fund reports its Key Performance Indicators associated with the main workflow processes to both the Pension Committee and Local Pension Board using the Heywood's Insights reporting tool. Any breaches of the law, including late processing, are also reported.

Third party data services

The Fund will make use of third-party data services to improve the quality of its data and to support the administrative function. These services are either minimal cost collaborative ventures or are procured commercially.

- **LGPS National Insurance Database** Administered by South Yorkshire Pension Fund Authority (SYPA) on behalf of the Local Government Association (LGA), the secure National Insurance Database was developed for LGPS administering authorities to identify scheme members who had LGPS benefits elsewhere to ensure the correct actions are taken when assessing members entitlement under the scheme regulations. Each administering authority is required to complete a data sharing agreement before data is uploaded and shared. When processing a payment, Officers will procedurally check the LGPS National Insurance Database for the existence of membership at other LGPS Funds.
- **“Tell Us Once” service** The secure LGPS National Insurance Database also facilitates the integration of the Fund's membership profile into the Department of Work and Pensions (DWP) ‘Tell Us Once’ service (TUO). The service allows an individual registering a death to request that the DWP pass on the deceased's information to other government and council services. If the deceased is a member of the Fund, as determined by the LGPS National Insurance Database, an email notification is received informing the designated officers that a copy of the death certificate is accessible on the secure government gateway.
- **National Fraud Initiative (NFI)** Administered by the Cabinet Office, the NFI programme is a biennial exercise that matches electronic data within public and private sector bodies to prevent and detect fraud. As a participant, the Fund receives a report of matches to investigate, to take remedial actions and update records accordingly.
- **Mortality screening services** The Fund procured the mortality screening service with Heywood Pension Technologies who provide the administration software, in Spring 2025. This checks its deferred and pensioner membership database against the national death register monthly. Any reported deaths are investigated and action taken if we have not received prior notification of this.
- **External tracing services** The Fund procured the address tracing service with Heywood, in 2025. A full address trace across pensioner, deferred pensioner, and deferred refund records will be run on an annual basis with the aim to reduce the



number of “gone away” members and ensure address accuracy. Ad hoc tracing can be done when required. This will be used when benefits are due for payment and the address details are out of date.

Data improvement plan

Appendix 1 contains details of the current areas of focus to improve the Fund's data. Progress against this plan will be monitored internally and updates reported as and when required to the Local Pension Board and Pensions Committee.

2025 - 2027 Plan Objectives (in priority order)

1. To ensure member records are maintained as accurately as possible to ensure benefits are paid correctly and on time.
2. To ensure member records hold the correct service history from any previous interfund or public sector pension fund to enable correct processing of records in respect of the McCloud remedy. To ensure records are rectified for all pensioners, deferred and death in service where an underpin has been identified.
3. To undertake an address tracing project to ensure data held is accurate and current as well as reducing the number of “gone away” members by using the recently procured Address Tracing Service with Heywood' the Fund's software provider.
4. To ensure that find data and view data is checked by using the Insights Reports to reduce the number of partial match requests or errors from the ISP console when the Pension Dashboard goes live.
5. To reduce the number of historical Deferred Refund (Status 9) records through engagement with appropriate members to claim their refunds.
6. Addressing common and conditional data failures from the Pension Regulator data scoring exercise undertaken in October 2025.



Measures of success

A key driver for the activities within the plan is an annual analysis of the Pension Regulator's common and conditional (scheme specific) data scores. The Fund targets a 100% score for both common and conditional data and uses the measurements provided by its software provider for the purposes of deriving the scores to be reported to the Pensions Regulator. The Fund would expect improvements in the data score over time. Further detail is shown at Appendix 2.

The Fund reports Key Performance Indicators (KPIs) for its main workflow processes quarterly to both the Local Pension Board and Pension Committee. These are set out in its Administration Strategy.

The Fund issues annual benefit statements to each deferred and active member. These statements are heavily reliant on accurate and timely data, and the Fund targets 100% to be issued by the statutory deadline of 31 August, with any material breaches reportable to the Pensions Regulator.



Appendix 1: Data improvement plan

Area of Improvement	Action	Method of Resolution	Resolution Timescale	Lead Officer	Resource Required
To ensure member records are maintained as accurately as possible to ensure benefits are paid correctly and on time.	The TPR data score for Common and Scheme Specific Data reported Continue to hold a 'Good' administration audit outcome	Address the fails raised from the insight's reports Ensure data is checked at year end and when processing a record	During 2026 until next TPR return scoring for assessment of progress	Cheryl Morrell/Helen Tomkins	Systems Team and Membership and Benefits Team
To ensure member records hold the correct service history from any previous interfund or public sector pension fund to enable correct processing of records in respect of the McCloud remedy. To ensure records are rectified for all pensioners, deferred and death in service where an underpin has been identified.	To be collected from members and when a transfer takes place Records are individually and manually rectified	To ensure forms hold the correct request for other pension fund service M&B Team to work through rectification cases from reports	During 2026 and ongoing	Helen Tomkins	Membership and Benefits Team



Area of Improvement	Action	Method of Resolution	Resolution Timescale	Lead Officer	Resource Required
To undertake an address tracing project to ensure data held is accurate and current as well as reducing the number of “gone away” members by using the recently procured Address Tracing Service with Heywood’s, the Fund’s software provider.	To implement the new address tracing service To assess results and identify the high priority areas for address update	Work with Heywood’s to test and implement to Live To internally assess which areas are to be accepted and which members need letters and checks	Implementation November and December 2025 Address cleansing and tracing during 2026 until the next annual set of results will be done November 2026	Cheryl Morrell/ Helen Tomkins	Systems Team Membership & Benefits Team Communications Team
To ensure that find data and view data is checked by using the Insights Reports to reduce the number of partial match requests or errors from the ISP console when the Pension Dashboard goes live.	Insights reports to be used for checking data	Ensure a process is in place for regular checks and for updates that can be done or for further checks to be conducted	Ongoing following connection deadline date of 31 October 2025	Cheryl Morrell	Systems Team
To reduce the number of historical Deferred Refund (Status 9) records through engagement with appropriate members to claim their refunds.	Use reports available on Insights to show the number of outstanding Deferred Refund records	Write to members to claim refund	During 2026	Helen Tomkins	Membership and Benefits Team Systems team for bulk letter production



Addressing common and conditional data failures from the Pension Regulator data scoring exercise undertaken in October 2025.	To report the best data quality scores for both common and scheme specific data to the Pensions Regulator	From the insights reports assess the areas that TPR score and amend records accordingly or consult with software provider if changes cannot be made	During 2026 and to scoring assessment November 2026	Cheryl Morrell	Systems Team Membership and Benefits Team
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Appendix 2: Pension Regulator data scoring

The data quality review undertaken split the assessment of data held between two data categories:

- Common Data
- Scheme Specific Data

Tests were undertaken on the data held by the fund on its Scheme members to identify whether data is present and accurate. The Common Data items are specific in the Pensions Regulators guidance.

Scheme Specific data items are not prescriptive by The Pensions Regulator but is data key to running the Scheme and meeting legal obligations. In July 2019, the Scheme Advisory Board issued LGPS scheme specific data items to be measured and scored for the TPR's annual scheme return going forward and these have been used to calculate the Fund's scores.

The Fund also performs wider data quality tests which do not fall into the core tests which should be used when calculating the data scores to be submitted to The Pensions Regulator (TPR). Although the results of the wider tests do not impact on the data scores reported to the TPR any failures in the tests are investigated as best practise.

Data scores reported in 2025 scheme return

Data category	2025 data score	2025 data score reported*	Aim
Common data	98.50%	99%	100%
Scheme specific data	98.25%	98%	100%

*TPR scoring system only accepts rounded figures



Data improvement approach

When tackling the data errors identified during the 2025 Data Quality exercise, the objectives listed in this plan will be used when making the decision on the errors to be worked on first. Data which has the greatest impact on member benefits will be looked at as a priority therefore any data errors highlighted on pensioner member records will be looked at first, followed by deferred and active members.

The below provides a breakdown of the areas, within the common and scheme specific data errors found following the 2025 data quality tests which require improvement. Further detail has been provided for scheme specific errors for reference.

Breakdown of activities for improvement - common data

Data Category	Milestone	Priority	How	Deadline	Update as of November 2026	Lead Officer
NI Number	Obtain correct NI numbers for the members with temporary numbers or those in the incorrect format	Low	Team to investigate each case and update record	March 2026		Helen Tomkins
Address	The outstanding 'gone away' members to be traced on an annual basis	Medium	Member tracing service will now be completed on an annual basis to keep address information up to date. As more members access the online portal it is becoming easier to stay connected where an email is on account, and we can use	October 2026 For initial addressing tracing to be completed and deferred		Helen Tomkins/ Cheryl Morrell



Data Category	Milestone	Priority	How	Deadline	Update as of November 2026	Lead Officer
			this to notify members when benefits become due. However, for historical deferred refunds, where they are listed as Gone away and no email is held, once the address tracing is completed a project will commence to try and clear as many of these cases	refund clearance to start.		

***Where records cannot be updated, or it is not efficient to spend resources to investigate updating the record, a management decision will be taken on the impact of not resolving the data issue/gap.**

For context, a breakdown of the number of failures in the common data tests, compared with the number tested, of the data categories highlighted in this plan for improvement:

Category	Qualifying members Tested	Members with test fail	TPR Score
NI Number	69,436	544	99.22%
Address	69436	1019	97.85%



Breakdown of activities for improvement - scheme specific data

Data Category	Recommendation	Suggested Priority	How	Deadline	Update as at November 2026	Lead Officer	Other resource required
Member benefits	Investigate the gaps or incomplete data highlight on the data quality report in the following areas: transfer details 1 & 2, AVC details, total original deferred benefits, total gross pension	High	Team to investigate each case and update record	September 2026	This work is to commence	Helen Tomkins	Systems team to sort from Insights reports
Member details	Investigate the gaps or incomplete data highlight on the data quality report in the following areas: date of leaving, employer details, final salary.	High	Team to investigate each case and update record	September 2026	This work is due to commence	Helen Tomkins	Systems team to sort from insights reports
CARE data	Investigate the gaps or incomplete data highlight on the data quality report	High	Team to investigate	September 2026	This work due to commence	Cheryl Morrell	Systems team
HMRC	Investigate the gaps or incomplete data highlight on the data quality report	Medium / High	Team to investigate	September 2026	This work is due to commence	Helen Tomkins	Systems team to sort from Insights reports
Contracting out	Investigate the gaps or incomplete data highlight on the data quality report	Medium / High	Team to investigate	September 2026	This work is due to commence	Helen Tomkins	Systems team to sort from Insights reports
McCloud Remedy Data	Investigate the gaps or incomplete data highlight on the data quality report	Medium / High	Team to investigate	September 2026	This work is due to commence	Helen Tomkins	Systems team to sort records for checking from Insights reports

For context, a breakdown of the number of failures in the scheme specific tests, compared with the number tested, of the data categories highlighted in this plan for improvement:



Category	Qualifying members Tested	Members with test fail	TPR Score
Member details	55,019	6,836	99.93%
Member Benefits	37,238	1,020	99.56%
CARE data	33,728	497	98.58%
HMRC	48,325	1,287	99.09%
Contracting out	50,865	404	99.25%
McCloud Remedy Data	35,267	618	100%



Contact details

The Shropshire County Pension Fund is a data controller under data-protection law. This means we store, hold and manage your personal information in line with statutory requirements to enable us to provide you with pension administration services. To enable us to carry out our statutory duty, we must share your information with certain bodies, but will only do so in limited circumstances. For more information about how we hold your information, who we share it with and what rights you have, you can ask for this information from the fund, please visit www.shropshirecountypensionfund.co.uk.

If you can read this but know someone who cannot, please contact us on 01743 252130 so we can provide this information in a more suitable format.

Office hours

Monday to Thursday 8.45am to 5.00pm

Friday 8.45am to 4.00pm

Helpdesk phonelines are open Monday, Tuesday and Thursday: 10am to 4pm, and Wednesday and Friday: 10am to 1pm (excluding Bank Holidays).

Contact details

Contact form: [Contact us | Shropshire County Pension Fund](#)

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