

# **Data Improvement Strategy & Plan**

## **Lambeth Pension Fund**

**April 2026**

**Version 1.0**

## Contents

1. [Introduction](#)
2. [Objectives](#)
3. [The Pension Regulator Requirements](#)
4. [Maintaining good quality data](#)
5. [Third Party Data Services](#)
6. [Data Improvement Plan](#)
7. [Measures of Success](#)
8. [Effective Date & Review](#)

[Appendix 1](#)

[Appendix 2](#)

## 1. 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.

The London Borough of Lambeth Pension Fund's (The Fund's) Data Improvement Strategy & Plan is a document that outlines the steps taken to assess and improve the quality of data held within the current Pension System Software (PSS). This document lists the key objectives to achieve better data, and outlines a clear, structured approach to improving data quality. It represents an ongoing commitment to data excellence and effective pension fund governance, rather than a one-off exercise.

## 2. Objectives

The Fund's data improvement objectives are to:

- Proactively identify and correct errors affecting member records.
- To provide scheme employers with guidance to ensure the timely receipt of accurate data.
- Achieve and maintain full compliance with The Pensions Regulator's record-keeping requirements.
- Support the implementation of regulatory changes, including the Pension Dashboard Programme.
- Developing technology to improve data quality.
- Foster a culture of continuous data improvement within the Fund and across all employers.

## 3. The Pension Regulator Requirements

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

**Common Data** is data that is held across all pension schemes and includes core member identifiers such as National Insurance number, full name, gender, date of birth, address (including postcode), and member status.

**Conditional (Scheme-Specific) Data** is specific to a scheme and for the Local Government Pension Scheme (LGPS) covers information such as employer details, salary, service history, CARE pay, AVCs, GMP data, and benefit crystallisation events.

This plan outlines the steps the Fund will take to improve data quality, focusing on meeting TPR's data score standards.

#### **4. Maintaining Good Quality Data**

A list of regular internal processes in place to identify and resolve data issues is contained in Appendix 1.

In addition, the Fund will also use the following approaches to ensure that high quality data is received from data providers, and that 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 scheme employers to provide accurate and timely data to the Fund and the sanctions that may be imposed when those standards are not met.

##### **Monthly Data Returns**

The Fund insists on monthly data collections from employers using standard manual templates and the pension system's iConnect submissions where possible. The Fund is actively working with employers and payroll providers to assist with the transition from manual templates to iConnect. The benefit of a monthly return includes ensuring that employee's contributions, member's personal details, and financial records are up to date, accurate and complete. All returned data is put through internal validation checks to ensure accuracy.

##### **Scheme Employer Support**

The Fund is reliant upon the accuracy, completeness and timeliness of data provision from data providers such as scheme employers and payroll providers.

The Fund will provide support to scheme employers in their responsibilities, including the accurate and timely provision of data and to facilitate training sessions where required. The Employers Team monitor scheme employer performance in connection with these duties and the performance targets set out in the Fund's Administration Strategy.

#### **5. 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. Current services being used are as follows:-

##### **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 benefits in respect of a scheme member, for example a refund of contributions or death benefits, 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 a person registering a death to request that the DWP pass on the deceased’s information to other government services 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**

Administered by the Cabinet Office, The National Fraud Initiative (NFI) matches electronic data within and between public and private sector bodies to prevent and detect fraud. The Fund submits data to National Fraud Initiative on both a monthly basis via FraudHub, as well as participating in the biennial NFI exercise, to identify deceased members and members who are no longer entitled to receive a pension. 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 uses a mortality screening service provided by Heywood Pension Technologies, to check its deferred and pensioner membership database against the national death register on a monthly basis. Any reported deaths are investigated and remedial action taken.

### **External Tracing Services**

The Fund uses a commercial tracing service, Target Professional Services UK Ltd, to check the most recent postal address for deferred and pensioner members. The Fund uses this service on an as and when required basis, where the Fund needs to contact the scheme member, but contact has been lost. The loss of contact will usually occur when a deferred or pensioner member fails to notify the Fund of a change of address.

## **6. Data Improvement Plan**

Appendix 2 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. A revised plan will be formulated at least annually.

## **7. Measures of Success**

A key driver for the activities within the plan is the annual analysis of the Pension Regulator's common and conditional (scheme specific) data scores. The Fund uses the measurements provided by its software provider for the purposes of deriving the scores to be reported to the Pensions Regulator. The Fund is required to report data quality scores to the Pension Regulator as part of the Annual Scheme Return. The Fund will report the Data Quality scores to the Pension Committee and Pension Board on a quarterly basis and would expect improvements in the data score over time.

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. Holding accurate data is key in assisting with the timely processing of workflow cases and will support good performance against KPIs.

The Fund will issue 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.

The Fund's Actuary, Hymans Robertson, has made a Universal Data Extract (UDE) facility available for the sharing of data between the Fund and the Fund Actuary. The UDE enables data quality to be measured through the number of critical errors and warnings within the dataset uploaded by the Fund to the UDE facility. The Fund would expect improvements in the number of critical errors and warnings over time.

## **8. Effective Date & Review**

This plan took effect from 1 April 2026 and will be reviewed at least annually to ensure it remains accurate and relevant. It may be changed as a result of legal or regulatory changes, evolving best practice and ongoing review of effectiveness of the plan.

**Appendix 1 – Internal processes in place to identify and resolve data issues**

<b>Internal Process</b>	<b>Regularity</b>	<b>Method of Resolution</b>
Run national fraud initiative reports	Biennially	Once the results of the exercise are made available, investigate any potential deaths and take the necessary action to suspend ongoing pension payments where proof of life is not provided
Review pensions increase errors for deferred, pensioner and dependant members following the annual exercise	Annually	Investigate any new errors and undertake the necessary remedial actions on administration system to resolve
Run reports to identify any active members who are missing CARE pay or contributions for the last scheme year	Annually	Investigate why there is missing CARE pay and or contributions and rectify accordingly
Investigate active or deferred Annual Benefit Statements not produced	Annually	Review the reason for non-production and resolve where possible
Upload membership data to the Universal Data Extract facility (UDE) as ongoing preparation for the triennial valuation	At least Annually	Manage critical errors and warnings with remedial action undertaken as required on administration system
Contact child pensioners who are between 18 & 23 to check their ongoing eligibility for a pension where they remain in education	Annually (July – September)	Contact the recipient and request evidence of ongoing education and cease pension where no evidence provided.
Run reports to identify any new errors showing under the TPR's common and conditional data requirements	Quarterly	Investigate any new errors and undertake the necessary remedial actions on administration system to resolve
Run reports to identify any new consistency errors showing for active and deferred member records on the pensions administration system	Quarterly	Investigate any new errors and undertake the necessary remedial actions on administration system to resolve
Run a report to identify any tier 3 ill health pensions in payment which are due to cease	Quarterly	Cease pension and contact the recipient accordingly
Checking and validation of monthly/year end data returns provided by scheme employers	Monthly / Annually (April – August)	Contact employer with any errors or missing leavers and monitor resolution
Mortality Screening using Accurate Data Services & Fraud Hub	Monthly	Investigate any potential deaths and take the necessary action to suspend ongoing pension payments where proof of life is not provided
Reconciliation between scheme employer contributions return and monies received	Monthly	Contact employer with any errors or missing payments and monitor resolution



Reconciliations between the pension administration system and the accounting ledger	Monthly	Identify any errors or missing payments and rectify accordingly
Identifying differences between the pension administration system and the payroll system in respect of pensions in payment	Monthly	Investigate differences of £24 per annum or more and rectify accordingly
Run a report to pick up any pensioner members who are active on the payroll but are showing as either gone away or deceased	Monthly	Investigate and resolve, suspending the pension where required.
Run a report to pick up any deferred or frozen refund members who are approaching age 75	Monthly	Attempt to trace the member and make payment of any benefits due
Run report to identify any active members with McCloud protections who have turned 65	Monthly	Calculate a pensionable remuneration to their 65 <sup>th</sup> Birthday and update their pension record accordingly
Run a report to identify any child pensions to be ceased where they are approaching age 18/23	Monthly	Cease pension and contact the recipient accordingly
Upload data to / download results from the LGPS NI database	Monthly / Ad Hoc	Use the results from the NI database to prevent any double payment of death benefits, unauthorised payments of refunds and to potentially trace members
Download results from the Tell Us Once service	Daily	Investigate any potential deaths and take the necessary action to suspend ongoing pension payments where proof of life is not provided
Address tracing for upcoming deferred pensions due into payment, pensioners where we have had correspondence returned, next of kin etc	Ad-hoc as required	Contact the member to confirm new address and refer cases to external tracing agent where further assistance with tracing is needed
Reporting system errors to Heywoods	Ad-hoc as required	Report any system errors via Sostenuto for investigation and resolution
Regularly review and update training and process notes for pension team	Ongoing programme	Review and update process notes accordingly

**Appendix 2 – Data Improvement Plan Apr 2026 – Mar 2028**

No	Area for Improvement	Action Required	Number of Affected Records	Method of Resolution	Timescale
1	Data cleansing for Pensions Dashboard	Carry out a one-off data enrichment exercise to gather missing or enhanced contact data for our deferred, active, and frozen refund members	8339	Review the results provided by the exercise and update records with data as required contacting members to validate any changes where necessary	30 Sept 2026
		Clear all historic status 2 records	70	Gather any missing information required to process the record to the necessary status	30 Sept 2026
		Review Insights dashboards and investigate any members with missing find data	11,684 out of 13,451	Most of these should be cleared by the one-off enrichment exercise as 11,491 of these errors are members who are missing mobile numbers. Any remaining cases will be assessed on the data we are required to hold in respect of our matching criteria	30 Sept 2026
		Review Insights dashboards and investigate any members with missing value data	673 out of 13,211	Investigate these cases and categorise into the reason view data is missing to see if these are cases which can be resolved or if there is a valid reason why there is no view data, for example, the member joined since the last 1 <sup>st</sup> April etc	30 Sept 2026
2	Suspended Pensioners	Review currently suspended pensioners to reinstate payment or finalise record	435	Trace suspended pensioners who are still alive and make arrangements to re-instate their pension. Trace next of kin of suspended pensioners who are deceased and finalise their record discharging or recovering any monies due to or owed from the estate	31 Mar 2027



3	Address historic common and conditional data failures from the Pensions Regulator data scoring exercise	Run reports to identify outstanding errors as at 31 <sup>st</sup> March 2026	<u>Common</u> 1,939 (of which 1,749 considered TPR failure)  <u>Conditional</u> 8,763 of which 760 considered TPR failure)	Gradually work through each category of failure resolving the data issues accordingly	31 Mar 2028
4	McCloud – Data gathering from other LGPS Funds	Carry out an exercise to check membership with other funds for non-eligible members which might bring them into scope for McCloud protections	216	Identify members using the NI database and request service dates from other funds using the LGA templates provided. Once information is received, update member records and determine any eligibility for McCloud protections if applicable	31 Jul 2026
5	Life existence exercise	Carry out a one-off life existence exercise for overseas pensioners and pensioners who are over the age of 80	2400 (approx.)	Send a life certificate to those categories of pensioner and suspend pensions where no response is received	31 Mar 2027