



**Northamptonshire Firefighters' Pension
Scheme(s)
(1992, 2006, 2015)**

**Data Improvement Policy
March 2019**

1. Introduction

- 1.1 It is the responsibility of the Scheme Manager to pay the correct pension benefits to its members when they become due. It is therefore essential that the highest possible data quality standards are achieved and maintained.
- 1.2 The administration of the Firefighters' Pension Scheme is currently undertaken by LGSS Pensions, a joint partnership of Cambridgeshire County Council, Northamptonshire County Council and Milton Keynes Council. However, the Scheme Manager of The Office of Northamptonshire Police, Fire and Crime Commissioner remains ultimately responsible for all aspects of administration of the Firefighters' Pension Scheme including data quality.

2. Background to the policy

- 2.1 The Public Service Pension Act 2013 came into effect on 1 April 2014 following the Independent Public Services Pensions Commission review conducted by Lord Hutton. The Act gave increased powers to the Pensions Regulator to ensure that public service pension schemes had appropriate measures in place to ensure high standards of governance and administration.
- 2.2 The Pensions Regulator articulated these standards through the code of practice 14 – governance and administration of public service pension schemes. The 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.

3. Key policy objectives

- 3.1 The key objectives of this policy are to ensure that:
 - The Scheme Manager ensures compliance with the guidance of the Pensions Regulator and establishes a robust, reviewable, measurable and transparent framework necessary for the processing of accurate, complete and up-to-date records.
 - Accurate records are maintained for the purpose of calculating pension entitlements and employer liabilities; ensuring all information and data is communicated securely and accurately within prescribed timeframes.
 - The continued development of appropriate technology to improve data quality standards and the streamlining of operational processing.
 - All data collection processes are clearly documented and are regularly reviewed to ensure the validity of data and to ensure they are aligned to updated legislative requirements.
 - There is commitment to monitor the delivery of specified activities in accordance with the relevant regulations and the Pensions Regulator's Code of Practice.

4. Purpose of the policy

- 4.1 This policy applies to all data and records held for the purpose of administering the Scheme and that held by system suppliers, professional service providers and consultants acting on behalf of the Scheme Manager during the course of carrying out the administration function.

4.2 Records are defined as all those documents which facilitate the activities carried out in the course of administering the Scheme and those retained for set periods to provide evidence of its transactions or activities. These records may be created or received and then stored, in paper copy or digital form (document, spreadsheet, database entries etc).

5. Effective date and reviews

5.1 This policy was reviewed by the Local Pension Board on 11 March 2019 and was approved by the Scheme Manager on 11 March 2019 and became effective from 11 March 2019.

5.2 This policy will be reviewed annually, and if necessary, more frequently to ensure it remains accurate and relevant.

6. Scope

6.1 The policy applies to:

- All scheme members including potential beneficiaries of members for whom the Scheme Manager holds personal data;
- Administrators of the scheme; and
- The Local Pension Board.

7. Legislative framework

7.1 The Scheme Manager has a legal and statutory obligation to comply with a number of regulations, standards and formal guidance relating to data quality. These include but are not limited to:

- Firefighters' Pension Scheme Regulations
- 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
- The General Data Protection Regulations
- The Pensions Regulator's Code of Practice (number 14): governance and administration of public service pension schemes

8. The Pensions Regulator

8.1 Code of practice

8.1.1 The Pensions Regulator's code of practice (number 14): governance and administration of public service pension schemes, provides practical guidance on scheme record keeping. Codes of practice are not statements of law and there is no penalty for failing to comply with them, nor is there a requirement for all the provisions of the code of practice to be followed in every circumstance. Any alternative approach to that appearing in the code of practice will nevertheless need to meet the underlying legal requirements. The legal requirements

relating to scheme record keeping are set out in the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014.

8.1.2 The code of practice states that schemes should:

- Continually review their data and carry out a data review exercise at least annually
- Where a review of the scheme's data identifies poor or missing data a data improvement plan should be put in place to address these issues

8.2 Public service governance and administration survey

8.2.1 Each year since 2015 the Pensions Regulator has conducted an annual survey of public service pension schemes to assess how schemes are meeting the requirements within the code of practice and the standards to which the schemes are being run. The survey results have provided the Pensions Regulator understanding on the barriers to data improvement and highlighted record keeping and data quality as high risk areas when compared with the other requirements within the code of practice.

8.2.2 The Firefighters' Pension Scheme participates in the survey every year and reports to the Local Pension Board a comparison of the Scheme's position in relation to the findings.

8.3 Mandatory annual return

8.3.1 On an annual basis the Pensions Regulator will issue an annual return which if not completed and returned is regarded as a breach of the law under the Pensions Act 2004.

8.3.2 From 2018 onwards the annual return will require a score as to the quality of the scheme's data. The Pensions Regulator has identified 2 categories of data that all pension schemes must provide a score for. These categories are common data and scheme-specific data broadly defined as follows:

Common data – used to identify scheme members and includes name, address, national insurance number and date of birth.

Scheme-specific data – essential to calculate benefit entitlement such as pensionable pay and service history.

8.3.3 The Pensions Regulator has issued a quick guide on measuring scheme data which states that one piece of missing data, such as a current address on a deferred member's record should be reported to them as a failed record.

9. Other data

9.1 The Scheme Manager will also ensure that data not considered to be common or scheme specific, but has a processing need such as data required for the payment of pensions (e.g. tax codes, bank details) and data belonging to potential beneficiaries is also maintained to high standards of quality, accuracy and security.

10. Data Protection

- 10.1 The Scheme Manager needs to collect and process different types of information about individuals in the scheme and their potential beneficiaries in order to operate. The General Data Protection Regulations (GDPR) details the requirements, safeguards and member's rights which must be applied to personal data to ensure the rights and freedoms of living individuals are not compromised.
- 10.2 The Office of Northamptonshire Police, Fire and Crime Commissioner is the data controller as defined by the GDPR and must observe the principles relating to the processing of personal data. Registration at the Information Commissioner's Office (ICO) can be found under registration number Z355902X.
- 10.3 Article 5 of the GDPR sets out the principles relating to the processing of personal data and states that personal data shall be accurate and where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed are erased or rectified without delay.
- 10.4 Where a Scheme member, their representative or a potential beneficiary has identified an inaccuracy or omission in their data that is held by the Scheme Manager, they have a right to rectification. As such a request for rectification can be made either verbally or in writing to the Data Protection Officer who has one month to respond.
- 10.5 Where personal data is shared with a third party in relation to the necessary functions to administer the scheme, due diligence will have taken place to ensure that the data will be processed in accordance with the GDPR and will be recorded in the Scheme's privacy notice.
- 10.6 The Scheme's privacy notice can be found on the website of the Office of the Police, Fire and Crime Commissioner for Northamptonshire.

11. Third party data services

- 11.1 The Scheme Manager may make use of third party data services to improve data quality and to support the administrative functions. Such services are provided by external organisations as either collaborative ventures, with no or minimal cost or procured commercially using an established procurement framework.

12. Data Improvement Plan

- 12.1 To achieve compliance with the Scheme regulations, the Pensions Regulator's code of practice and to effectively administer the scheme, the Scheme Manager has put in place a Data Improvement Plan that identifies large scale data quality activities to be undertaken in the short term.
- 12.2 LGSS Pensions, as the current administrators, are responsible for updating and ensuring the completion of the activities identified on the Data Improvement Plan.
- 12.3 The Data Improvement Plan will be kept under constant review with new activities added as they arise.

12.4 Progress against the Data Improvement Plan will be reported to the Local Pension Board at each meeting.