

Data Improvement Plan

November 2025



1. Introduction

This document outlines Gloucestershire Pension Fund’s Data Improvement Plan.

Following the publication of the Fund Data Improvement Strategy in 2024, this plan begins in section 2 by outlining the outcome of the Fund’s self-assessment of section 6 of its strategy ‘Measuring Success’ before detailing specific areas of focus that the Fund intends to undertake to improve the quality of its data in section 3 under the title ‘Plan Actions’.

2. Results from self-assessment

a) TPR’s common and conditional (scheme specific) data targets

The Pension Regulator (TPR) sets out two data-quality measures which it expects funds to test against: Common Data and Scheme Specific Data. Further information on each of these is set out below:

- **Common data:** Data used to identify scheme members and includes names, addresses, National Insurance Number and date of birth and other similar data.
- **Scheme Specific data:** Data deemed essential to calculate benefit entitlements for the LGPS such as, member contributions, pensionable pay & service history. It also encompasses data relating to events that occur during an individual’s membership, for example transfers, purchase of additional pension and pension sharing orders.

Data review outcome (as at 24 November 2025)

Measure	Score	Main areas of failure
Common Data	94.5%	Out of date postal addresses – Virtually all failures are due to this reason and a high percentage of those failures relate to deferred members (i.e. members who have not advised the Fund of a change of address).
Scheme Specific Data	95.0%	Primarily missing CARE pay for some active members and other technical failures (such as in relation to contracting out, which does not normally impact the value of scheme benefits)

The Fund’s target for both measures is 100% for Fund records where an entitlement to pension benefits exists.

b) Percentage of active and deferred Annual Benefit Statements Produced on time

The Fund produced 99.5% of Annual Benefit Statements where it held all the data necessary to produce the statement (such as up to date pay figures from employers and up to date addresses from members).

Taking into account employer or member-related limitations, the Fund's overall ABS percentages sent by 31 August 2025 were as follows:

Member Status	Percentage	Main reasons for statements not sent
Active	97.0% (2024: 96.5%)	Mixture of missing CARE pay and record mismatches due to poor employer data quality
Deferred	84.4% (2024: 82.0%)	Out of date postal addresses (nearly all)

Additional statements have been sent after the deadline date when data gaps were filled.

c). Key Performance Indicators (KPI)

The Fund's KPIs have exceeded the target 90% level, when taken as a single period in the year to 30 September 2025 and therefore no specific actions stem from this area.

d). Workloads

Whilst the KPIs are assessed to currently be in a satisfactory position in relation to the Fund's target, as part of the data review referred to in this category the Fund identified the need to update its records or improve its data in relation to the following processes:

- Aggregation and transfer of benefits – The Fund needs to reduce the number of aggregations outstanding. Whilst the immediate impact on a member is limited, it can create knock on delays, complications and inefficiencies.
- Frozen refunds – Due to the member having not claimed their refund of contributions despite being contacted at least once previously. In many cases, the Fund does not hold a current address.

Note: These workload improvement areas have been identified based on the volumes of cases being outstanding for longer than desired, rather than solely on the volume of cases that exist in total.

e). Data Consistency between the pensioner payroll and administration system

The Fund currently uses two different software systems: one to hold the core pensions data to perform calculations and one to make regular payments to members.

Fund officers periodically undertake reconciliations between the two systems to ensure that no material issues exist for all new pension records and when pension increase is applied across both systems. However, as part of these reviews, it has been identified that some other historical discrepancies exist.

Where the data discrepancy relates to data held within the Fund's administration system (Altair), or the conclusion from the review is inconclusive, Altair will be corrected. If the payment system is deemed incorrect, implying an under or overpayment of benefits, the case will be reviewed and addressed in keeping with the Fund's over and underpayment policy. As a percentage of the Fund's pensioners, the number of records with a discrepancy is relatively small.

f). Data consistency between employer and Fund data

As present, the main point of time when the Fund is currently able to undertake a full comparison of data items is as part of the end of year process (in the Spring/Summer of each year). This review is further supplemented by more limited monthly comparisons, to identify missing employer starter and leaver notifications. This inevitably leaves data discrepancies between the Fund and employers.

The Fund has started to onboard employers onto i-Connect, which should help alleviate this problem however some historical (and current) issues exist in relation to the following:

- Missing CARE pay – as is also visible in the TPR Scheme Specific failure score.
- Mismatches in the number of employer and Fund records for certain members (implying missing starter or leaver forms)

At present, 13 employers onboarded onto i-Connect. The Fund's goal is to onboard all employers over the next two years.

g). Pension Dashboard 'find' and 'view' data items

The Fund is currently using the following 'find' data items to seek an optimal balance of system security and maximizing the user's ability to access the system. Next to each data item, is a review of its assessed data quality:

- NI Number – Very high
- Date of birth – Very high
- Surname – Very high.

These are also the same data items that are used for security purposes for the Fund's member portal which has the added advantage in that by registering for the Fund's own portal would identify any data discrepancies.

In relation to the 'view' items, the main limitations at present are:

- The aggregation of records issue, as identified in part d.
- Missing CARE figures, as identified elsewhere

3. Plan actions

Following the review undertaken in part 2 of this plan, the Fund has decided to take the following actions.

Area of focus	Action	Limitations	Target	Financial Implications on budget	Timeframe
Deferred member address Data Cleanse	1). Repeat the address write out for incorrect addresses where the traced address is highly likely to be correct but no response was received. 2). Commission enhanced tracing where the member is close to retirement age and value of the benefits due is material.	Relies upon the member taking action to confirm their identity. Tracing service will not be able to find all members.	Write to all members in scope and correct all addresses where the member responds.	Cost of tracing service. Estimated at £5k-£10k.	Q3-Q4, 2026
CARE pay updated and record matching <i>(as at 31 March 2025)</i>	Continue to work through historical and monthly queries to reduce the number of outstanding cases.	Relies upon engagement from employers and sufficient Fund resource being available.	Review all queries and contact employers as required (and resolve where the Fund holds the necessary data already).	None – unless additional resource requirements are required.	Now to Q2 2026
Aggregations	Dedicate or increase resource assigned to this area of work.	Dependent on other Fund work priorities and resourcing levels	Reduce the number of cases sitting outside of the Fund's internal turnaround timeframes by at least 20% to seek to return to business as usual volumes	None – unless additional resource requirements are required.	Q4 2026

Area of focus	Action	Limitations	Target	Financial Implications on budget	Timeframe
Frozen Refunds	<p>a). Repeat the write out to members to encourage them to take benefits (undertaking second stage tracing where the values are material).</p> <p>b). Archive cases with trivial refund values are due (particularly when the member cannot be traced)</p>	Member engagement	Reduce the number of cases outstanding.	Cost of tracing service, estimated at up to £5k	Now to Q4 2026
Administration systems discrepancies	Complete the case by case comparison for each record where non-trivial differences exist.	Resource availability, technical complications clarity of historical records, access to archive systems	Complete the comparison	No impact on the Fund's budget and an immaterial impact on Fund liabilities	Q4 2026
Contracting out information	Add additional contracting out information to Altair	Resource availability	Complete for all active and deferred members to help improve tPR percentages.	None	Q4 2026

It is anticipated that completing all these actions will have the impact of increasing key metrics and enabling the Fund to become more efficient and effective.

4. Review

In keeping with its Data Improvement Strategy, the Fund will undertake informal progress reviews during the year and a formal review of its data each year being producing a revised Data Improvement Plan.

Version	Reason for change and approval
1.0	New plan created, approved by Gloucestershire Pension Fund Committee on 4 December 2025