Data Improvement Plan (DIP)

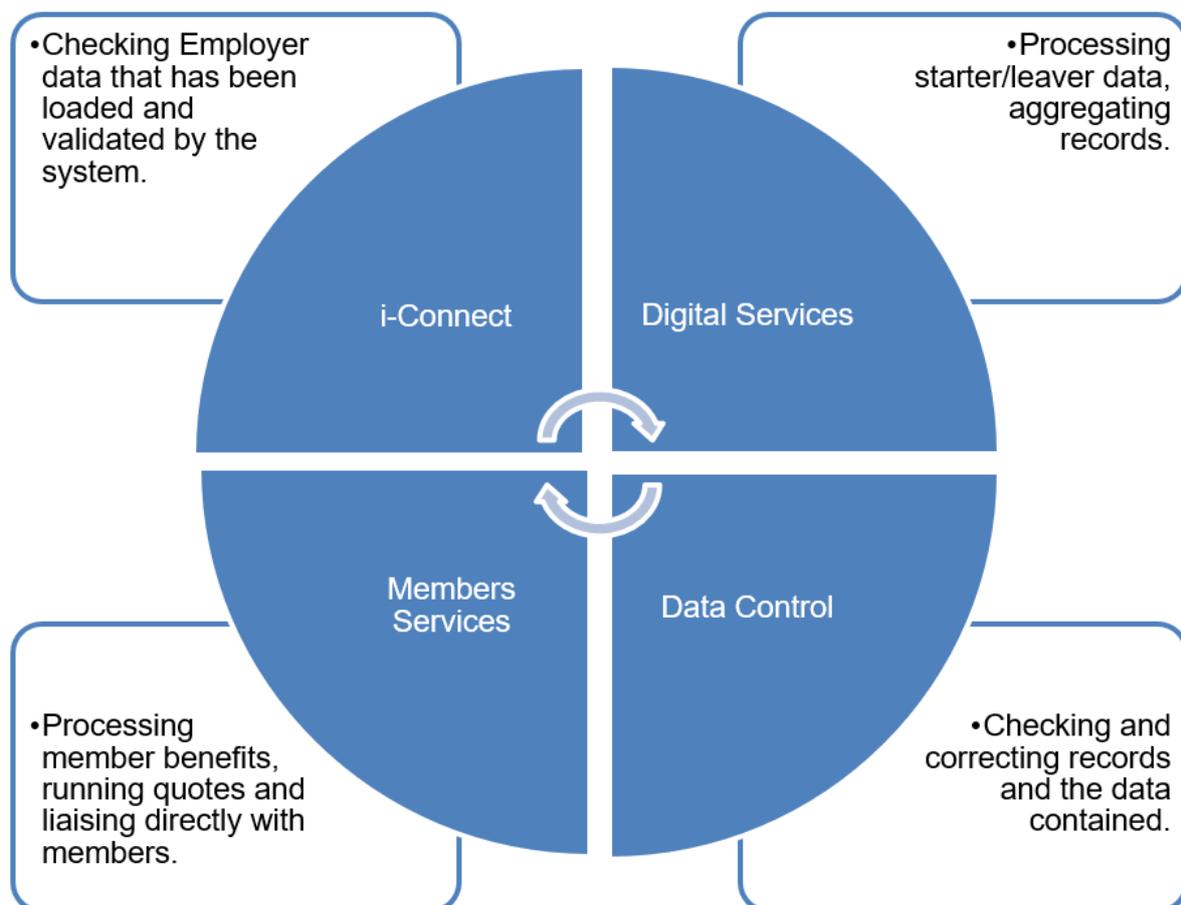Avon Pension Fund
March 2026

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Introduction

Avon Pension Fund's Data improvement plan (DIP) is a document that outlines the steps taken to assess and improve the quality of data held within the Fund's administration system, current Pension System Software (PSS). This document lists the key objectives to achieve better data, and how the Fund will implement changes or projects to cleanse data.

As per The Pensions Regulator's (TPR) definition of data, data is classed as either *Common data* or *Scheme Specific data*. Common data is data that is held across all pension schemes, Scheme data is specific to a scheme, so may differ between funds.

With the implementation of the Pension's Dashboard and our requirement to connect in October 2025, there is an increased need for the Fund to cleanse and check the data held. The Fund is continuously reviewing its core data for completeness and accuracy. The data that is received from employers goes through a cycle of processes to ensure its accuracy. The below illustrates the cycle of data.

APF data cleansing cycle

- Checking Employer data that has been loaded and validated by the system.

i-Connect

- Processing starter/leaver data, aggregating records.

Digital Services

- Processing member benefits, running quotes and liaising directly with members.

Members Services

- Checking and correcting records and the data contained.

Data Control

Objectives

Avon Pension fund Data Improvement Plan (DIP) has been designed to give a clear, structured, and auditable route and plan to diagnose data issues and improve the data accuracy, completeness, and embed long term governance of their member data.

Key objectives:

- Compliance with the Pension Regulations single code of practice.
- Members are able for find and see their own financial data within the Pensions Dashboard infrastructure.
- Delivery ongoing and timely data cleansing of our members data.
- All data is present and correct to ensure members receive an accurate and timely pension.
- Maintain a data score of 95% or above.

Data definitions

i-Connect -data from employers for active members. i-Connect is a portal that allows employers to upload their data directly to our administration system. Information supplied by the employer regarding members, is validated by the employer at joining as part of their employment checks. Avon Pension Fund (APF) will verify data again upon payment of benefit.

Common data

Common data is mandatory as per TPR guidance, it is information that is consistent throughout all pension funds and is required for the everyday running of a pension fund. The Funds approach to cleanse and update Common data is as follows.

Types of Common data and how it is updated.

Type of data	Information supplied
Address including post code	- Active members – a member may update personal details via a member portal. As we also receive data via i-Connect, members are also advised to contact their employer to update their address. - Non-Active members - Where a member's address is not known (marked as gone away), the Fund uses tracing services to locate the member's new address. A generic letter is sent asking the member to contact the Fund to confirm their identity and update their address.

Date pensionable service started, membership / policy start date or first contribution date	• This is the date that the member joins the Fund. • Monthly consistency reports are run to identify inconsistencies between date commenced current employment and date joined fund.
National Insurance number (NINO)	• A NINO is a unique identifier allocated by HMRC. • Records require a NINO, in some instances a temporary number is supplied, the fund requests corrections of any temp NINOs from the employer.
Surname and either forename or initials	• When an employee changes their name, for example through marriage, a copy of the marriage certificate is required.
Sex	• A monthly consistency report is run to identify any name, title or sex are mismatched.
Date of Birth (DoB)	• A monthly consistency report is run to identify anyone under 16 or over 75 and not in payment.

Types of Common data generated by the Pensions Administration System.

Type of Data	Information generated by the Administration System
Expected retirement/maturity date (target retirement age)	• Automatically generated based on date of birth.
Membership Status/ Last status event	• Membership status is a field that provides additional information about a member. • The date of status change is auto generated the status options within the system are as follows: 1: Active 2: Undecided Leaver 3: Exit no liability 4: Deferred 5: Pensioner 6: Widow/Dependant 7: Death 8: Awaiting Entry 9: Frozen Refund O: Optant Out T: Third Tier Cessation A: Non-Protected Z: Aggregation

Scheme specific data

Scheme specific data is data that has been determined by the Scheme Advisory Board (SAB) relevant for the LGPS and is deemed as necessary to have the below information to provide accurate information to the member. The list below is not exhaustive but are the main areas of data requiring cleansing.

Types of Scheme specific data how accuracy checks are undertaken.

Type of Data	Reaction to Issue
Members Salary	This is broken down into two categories: 1. CARE Career Average Revalued Earnings, this is the actual pay a member received (post 2014 service). 2. Final salary this is the full-time equivalent of a member's salary without reduction (see exclusions on our website) applicable to members with pre 2014 service. • Monthly comparisons are carried out and final checks at Year End.
Employer and Employee contributions	• Provided by the employer on monthly returns. • Data returns are checked monthly and reconciled by the funds Accounts team. • Additional checks are carried out at Year End.
Employment Records	• Records of a member's employment, dependent on service a member may have multiple records at different statuses. • Monthly control reports are run by Digital Services team to identify multiple records that can be aggregated.

The Fund approach

The Fund continually reviews its member data, and has the following safeguards for members:

- **Active members:** Data is submitted monthly by the employer. The Fund carry out regular checks for completeness and accuracy. At Year End the Fund carries out further checks that can only be done after the final submission for the financial scheme year.

- **Deferred Members** Data relating to deferred members is considered *static* and is not expected to change during the deferral period. Updates will only be applied where required to reflect retrospective legislative changes or corrections identified through ongoing data quality reviews. As such, improvement activity for

this cohort focuses on ensuring legislative compliance, maintaining accurate historical records, and addressing any identified data anomalies. Pension Increase (PI) is applied to their pension account annually. In instances where the member has their correspondence returned as gone away, they are traced via tracing services.

Regular control reports are run to identify and resolve any data issues.

Data validation for active members.

Data Validation	Fund Action
LGPS Eligibility issue – Age 75 Exceeded	- Members are only permitted to contribute to the scheme until they are 74 years and 363 days old. - If a member's age exceeds this, it is queried with the employer, as they are unable to remain an active member in the scheme. - It is recommended that the date of birth of a member is checked to make sure it is correct.
CARE pay required	- CARE pay is required for every member to calculate their pension. - Queried with employer if data is missing or appears incorrect.
Correct Address Required	- Members with gone away addresses are queried with the employer. Required format for addresses is as follows to ensure matching for the Pensions Dashboard: - House name/number, Street name, Town/city, Post code.
Correct NI Number required	- This is a key member identifier. - Temporary NI's are given to people that do not yet have an NI/ non-UK resident.
Date joined fund required (DJF)	- Should reconcile with a member's service record. - Issues can arise when a backdated DJF is provided, due to late starter notifications or re-enrolment into the scheme.

Leaver form received	• A leaver form is required for any member over 55 leaving the scheme or death or ill health case. • Regular checks are undertaken to ensure the fund receives a form for all relevant leavers.
Full Time Equivalent (FTE) pay (and for the McCloud underpin)	• Full Time Equivalent is the amount a member earns over a 365-day period without reduction. • It is used for members that have pre-2014 service and the McCloud underpin. • This information is checked for variances with the Employer at year end and any corrections are made manually.
Correction of Forename/Surname/DOB	• Forename, surnames and DOB are important for member identification. • This data is validated by the employer at the point of appointment to the role and then by the fund at the point of benefits payable.

Reporting Employer non-compliance and escalation

All data queries will be sent to the employer, who must respond within the SLA's set by the fund in the pensions administration Strategy (PAS).

The Fund will manage outstanding data queries with an employer, and any non-compliance will be managed in line with the Pensions Administration Strategy and service level agreement for employers.

For a more detailed breakdown of our process and penalty fines, please refer to the Pensions Admin Strategy.

Other data cleansing projects

APF will carry out ad-hoc data cleansing as and when issues arise or regulations change. The following are not an exhaustive list of all projects:

McCloud

In 2018 the court of appeal implemented a remedy to remove discrimination and ensure equal rights to those who's pensions were affected by the change to Career Average Revalued Earning scheme regulations as of the 1st of April 2014. This meant that members with qualifying service prior to 1st April 2012 with no gap in

service greater than 5 years are entitled to have the service accrued between 1st of April 2014 to 31st March 2022 revalued under the final salary scheme, if found to be of higher value this forms an underpin that will be paid to the member upon retirement. A data exercise was required to ensure APF had complete service records for members for the underpin period.

Casual hour project

Casual hour data projects are carried out on a regular basis to record service hours of casual members that were not previously held.

Age 65 project

Under the McCloud ruling, it is required that any member that has qualifying service will have a Pensionable remuneration figure calculated to the day before their 65th birthday. The Fund carries out underpin checks using information already provided, and an FTE is requested where an underpin applies. For Active members, once they reach age 65 the Fund will contact the employers to confirm the pensionable remuneration figure.

Address tracing project

Outstanding address data queries for non-active members are reviewed on a regular basis. Within the administration system, monthly data checks are run to identify changes in member data using various external data sources. Once traced a mailing is sent to the member to request the member validates their new data/address.

Pensions into payment

When a member has reached pensionable age, their pension must be put into payment according to regulations. However, if a member address that is held is incorrect, the fund must take necessary steps to trace these members.

Actuary data tool

The data tool is provided by the scheme actuary following an annual data return and consists of prioritised data that could have a material financial impact to an employer's liability in the Fund, this is dependent on the size of employer. Once received by the actuary, the data is reviewed per employer and actioned where necessary.

AVC reconciliation

Members can elect to pay additional voluntary contributions (AVC) which are set up by the fund with a third party, the current AVC provider is Legal and General. As

contributions are not paid directly to the Fund, the fund carries out regular additional reconciliations to the member data held within the funds system and AVC provider.

Other ways we receive information

Tell Us Once, is a government service that a member of the public can use to notify multiple government departments about a person's death. This data is received through the pension payroll department. Death certificates are not required if this service is used.

NI database

The National insurance database is used for the following events:
- New Starters
- Refunds
- Deferreds
- TVOUTS
- Interfunds
- Retirements
- Ill Health
- Deaths

Where a member has a match for qualifying service, the other LGPS is contacted for service details.

Roles and Responsibilities

Owner and responsible parties

Owner: Claire Newbery

Responsible parties: Data quality is the responsibility of all Avon Pension Fund staff. The Data Control team are responsible for reviewing the APF data recorded on Altair and taking action to correct any errors identified.

Trustee/Governing body

- Written procedures are in place for all data checking requirements.
- The Pension Board are responsible for the oversight of data cleansing done by the fund.

Administrator

- Data quality is reported quarterly to the Pension Board.
- Changes in procedure and additional data projects are discussed at the monthly Change Programme meeting.

Other third-party provider

Heywood provide a monthly review of deferred member data; the output of the review is assessed by Data Control team who are responsible for any corrective action required.

Resource requirements

The Data Control team is responsible for the fund data. The team consists of an Employer Services Manager, a Data Control Team Leader, two Senior Pension Officers and five FTE Pension Officers.