

## TPR data requirements - 2019

### Background

For the first time in 2018, TPR asked schemes to measure the data they hold about their members and report this on the annual scheme return. The LGA Bluelight team issued guidance on data scoring including which data items might be considered. This document revises the guidance for the 2019 return.

Information about measuring data is available on the TPR website:

<https://www.thepensionsregulator.gov.uk/en/trustees/managing-db-benefits/governance-and-administration/record-keeping/review-your-scheme-data>

To assist with completion of the scheme return, TPR have provided the following checklist and example return:

<https://www.thepensionsregulator.gov.uk/-/media/thepensionsregulator/files/import/pdf/db-scheme-return-checklist.ashx>

<https://www.thepensionsregulator.gov.uk/-/media/thepensionsregulator/files/import/pdf/db-scheme-return-example-form.ashx>

Each scheme manager has responsibility for completing the scheme return and therefore for completing the data score analysis. While they may ask their administrator to perform the exercise, they should be aware that they will need to consider data that is needed but might not be programmed for within the pension software, i.e. various manual calculations or payroll information.

It is important to remember that data scoring should not be considered a test of software or administrators, but is a measure to ensure that data is provided accurately by employers and can be accessed appropriately when required in order to calculate members' benefits accurately.

TPR have indicated no preference as to whether different scores for each scheme are recorded or the same score across the three schemes, it is more important for TPR to see an increased priority from FRAs in improving the data held about their members.

One score should be sufficient for TPR to see a progression in data quality, however, we are aware that each scheme may present different challenges to data, and therefore scheme managers and pension boards may prefer a score split by scheme, to identify difference in data quality between schemes and target where resources should be used in making improvements.

Ideally all FRAs would report on a common basis to ensure consistency.

## Data categories

There are two different categories of data– common and scheme specific. Although TPR have produced some general guidance on what records to keep, there are no particular guidelines for the Firefighters' Pension Schemes.

<https://www.thepensionsregulator.gov.uk/en/trustees/managing-db-benefits/governance-and-administration/record-keeping/what-records-to-keep>

The following pages give more information about each data category.

## Common data

A list of 11 basic data items which are used to identify scheme members and should be held by all schemes. The data must be present and accurate for all members. However, data does not need to be measured where there is no further liability – for example the member has transferred out or received a refund of contributions.

	Data item	Comment
1	National Insurance number	'TN' formats should be regarded as missing data. The final character of NI numbers is not essential.
2	Surname	Check that the surname is present.
3	First name or initials	Forenames are preferable but initials are an acceptable alternative. Check that one of these is present.
4	Gender	Check that a gender indicator is present.
5	Date of birth	Check that date of birth is present and consistent (earlier than date joined scheme, retirement, date of leaving). Inconsistent dates should be classed as missing data.
6	Address	An address should be present for all members. 'Gone away', 'unknown' or similar should be treated as missing data.
7	Postcode	Check that a postcode is present if address is not identifiable as being overseas.
8	Start date of pensionable service	Check that the start date is present and later than date of birth. False dates should be classed as missing data.
9	Membership status – e.g. active, deferred, pensioner	Check that a current valid status is recorded for each member. This may be a dual status, e.g. active or deferred member with partial retirement or member with transitional benefits.
10	Last status event - date and reason membership status last changed e.g. from active to deferred.	Check that benefits taken are consistent with status, and, if status history is recorded, that the latest status is the same as the explicitly recorded current status.
11	Normal retirement date: <ul style="list-style-type: none"> <li>• 1992 Age 55 <a href="#">[Rule A13]</a><sup>1</sup></li> <li>• 2006 (Standard) Age 60 <a href="#">[Sched 1, Pt 2, Para 3]</a></li> <li>• 2006 (Special) Age 55 <a href="#">[Sched 1, Pt 2, Para 3 (3)]</a></li> <li>• 2015 Age 60 <a href="#">Rule 3</a><sup>2</sup></li> </ul>	Need to check that it is populated, consistent with scheme rules and statutory requirements, and is later than date of birth and pensionable service date.

<sup>1</sup> For the 1992 scheme, you may wish to also hold earliest eligibility to pension benefits, i.e. 30 years' service

<sup>2</sup> As defined in the interpretations under 'Normal Pension Age'

## Scheme-specific (conditional) data

Items which are required to run the scheme and pay accurate benefits. This will be different for each scheme, although there may be some similarities within types of scheme e.g. defined benefit, public service.

There will be variances in the data that system providers are able to extract from the pension administration system, and some data may not be held electronically at all.

The LGA agreed that in order to achieve consistency and allow for benchmarking and best practice, a standard list of scheme-specific items for FPS should be developed for the 2018 return.

Rather than produce a definitive list of data elements, we provided a range of suggested items, split into categories for active, deferred, pensioner, and dependant members. This was based on the GAD Universal Data Extract and TPR guidelines, subject to feedback from software suppliers and our knowledge of the Firefighters' Pension Schemes. We have added some new items for 2019 based on feedback from administrators.

The table below illustrates the 10 different types of member that exist within the FPS. When considering your return, bear in mind that not all of the suggested items will apply to every category of member.



### 10 different types of member

	Protected	Tapered	Unprotected	Transitional
1992 Scheme	√	√	X	√
2006 Scheme (Standard member)	√	√	X	√
2006 Scheme (Special member)	√	√	X	√
2015 Scheme	x	x	√	x

## ACTIVE

	Data item	Comment
1	Current scheme – 1992, 2006 (Standard), 2006 (Special), 2015	Check that membership class is present, if it is required in order to define the class of membership, from which the scheme rules and benefits applicable to the member can be ascertained.
2	Protection status and transition date	Check that protection status and taper date are present and consistent with date of birth and date joined scheme. False dates should be classed as missing data.
3	Any previous FS scheme membership - 1992, 2006 (Standard), 2006 (Special)	Check whether transitional data exists and that the dates are consistent with the scheme parameters.
4	Employer	Check that employer name is present.
5	Date joined current employer	Check that date joined employing company is present and is later than date of birth. False dates should be classed as missing data.
6	FS actual pay (past 3 years – amounts and dates)	Check that a final salary pay based on actual earnings (e.g. part-time) exists for each of the last 3 years and is greater than £1.
7	FS pensionable pay (past 3 years – amounts and dates)	Check that a final salary pay based on FTE earnings or reference pay exists for each of the last 3 years and is greater than £1.
8	Reckonable service	Split as necessary to calculate benefits and reflect aggregated service. Check that total reckonable service is consistent with start date and hours.
9	Qualifying service	Check that a total amount of Q service is recorded and consistent with start date.
10	Transferred-in service	If benefits have been transferred in, check that all relevant details are recorded. This will include (as a minimum) the details of the previous scheme, the amount of the transfer value (split between protected rights and non-protected rights and, if relevant, split between the amount received in respect of member and employer contributions and AVCs), benefits secured, and (if relevant) contracting out details.
11	Purchased service (added 60ths)	Check that full details of any purchased service are present, including amount bought, and total payable, whether by lump sum or periodic contribution.
12	Added pension (FPS 2015)	Check that full details of any added pension are present, including amount bought, and total payable, whether by lump sum or periodic contribution.
13	Part time indicator and % FTE	Both or neither should be present, check that this is consistent.

14	APB amounts (including CPD, LSI and temporary promotion)	Check that amounts paid, period dates and calculated APB amounts are present.
15	CARE pay from 01/04/2015 (or transition date)	Check that pay figures are present for each year of CARE membership from date of joining/ transition.
16	Accrued CARE pension from 01/04/2015 (or transition date)	Check that accrued benefit details are present if they are updated and recorded annually.
17	Annual revaluation percentage	Check that there is a history of revaluation percentage for the accrued pension for each relevant year.
18	PSOs/ Earmarking	If a member has had a pension sharing or earmarking order, check that full details of the benefits transferred/ to be paid to the ex-spouse/ex-civil partner are recorded.
19	Scheme pays debits	Check that details of any future scheme pays debits are recorded including amount of tax charge and annual pension debit.
20	Potential entitlement to two pensions or protected pay (reduction in pay)	Check that date of reduction and previous higher rate of pay is recorded if a potential entitlement to two pensions or protected pay (FPS 2015) has been established.
21	Contracted-out date	Check that this is present and not earlier than 06/04/1978.

<b>FPS 2006 SPECIAL MEMBERS</b>		
	<b>Data item</b>	<b>Comment</b>
22	Retained option election	An indicator should be present to identify that the member elected to purchase benefits under the retained option.
23	Additional special service	A record of additional special pensionable service awarded to the member (excluding any period relating to the conversion of standard to special service).
24	Converted special service	Details of service that was converted from standard to special service.
25	Settlement format	Indication of whether by lump sum or periodic contribution.
26	Settlement amounts (lump sum/ periodic to date)	Details of settlement amounts paid to date.

## DEFERRED

	Data item	Comment
1	Scheme at leaving – 1992, 2006 (Standard), 2006 (Special), 2015	Check that membership class is present, if it is required in order to define the class of membership, from which the scheme rules and benefits applicable to the member can be ascertained.
2	Any previous FS scheme membership - 1992, 2006 (Standard), 2006 (Special)	Check whether transitional data exists and that the dates are consistent with the scheme parameters.
3	Former employer	Check that name of former employer is present.
4	Reckonable service	Split as necessary to calculate benefits and reflect aggregated service. Check that total reckonable service is consistent with start/ end date and hours.
5	Qualifying service	Check that a total amount of Q service is recorded and consistent with start/ end date.
6	Transferred-in service	If benefits have been transferred in, check that all relevant details are recorded. This will include (as a minimum) the details of the previous scheme, the amount of the transfer value (split between protected rights and non-protected rights and, if relevant, split between the amount received in respect of member and employer contributions and AVCs), benefits secured, and (if relevant) contracting out details.
7	Purchased service (added 60ths)	Check that full details of any purchased service are present, including amount bought, and total payable, whether by lump sum or periodic contribution.
8	Added pension (FPS 2015)	Check that full details of any added pension are present, including amount bought, and total payable, whether by lump sum or periodic contribution.
9	FS pay at date of leaving	Check that final pensionable salary calculated at date of exit is present.
10	Initial deferred pension (FS)	Check that total original deferred benefit is present (either derived or explicit). Split by tranches of accrued pension (e.g. APBs) including separate records of any debit and credits.
11	Current deferred pension (including PI) (FS)	Check that this is present, split by tranches of accrued pension (e.g. APBs) including separate records of any debit and credits. The sum of the individual components must equal any total pension that is recorded on the system.
12	Date payable (FS)	Check that deferred payment date is present and consistent with date of birth.

13	Initial CARE pension	Check that value at date of exit is present, including revaluation to date of exit.
14	Current CARE pension (including PI)	Check that current value is present and includes any relevant PI.
15	Date attains SPA	Should be the date the member reaches state pension age under current legislation, for payment of 2015 deferred benefit.
16	PSOs/ Earmarking	If a member has had a pension sharing or earmarking order, check that full details of the benefits transferred/ to be paid to the ex-spouse/ex-civil partner are recorded.
17	Scheme pays debits	Check that details of any future scheme pays debits are recorded including amount of tax charge and annual pension debit.
18	Contracted-out date	Check that this is present and not earlier than 06/04/1978.
19	Pre/ Post-88 GMP	Check that a member with at least one month of pre 4/88 contracted out service has a pre-88 GMP. GMP must be divisible by 52. May be derived if total GMP and post 4/88 GMP are recorded. Check that a member with at least one month of post 4/88 service contracted out on a GMP basis has a post 88 GMP. Can be derived or explicit.
20	Date GMP revalued to	Check that a revaluation rate is present for each element of GMP.

<b>FPS 2006 SPECIAL MEMBERS</b>		
	<b>Data item</b>	<b>Comment</b>
21	Retained option election	An indicator should be present to identify that the member elected to purchase benefits under the retained option.
22	Settlement format	Indication of whether by lump sum or periodic contribution.

## PENSIONER

	Data item	Comment
1	Scheme at leaving – 1992, 2006 (Standard), 2006 (Special), 2015	Check that membership class is present, if it is required in order to define the class of membership, from which the scheme rules and benefits applicable to the member can be ascertained.
2	Any previous FS scheme membership - 1992, 2006 (Standard), 2006 (Special)	Check whether transitional data exists and that the dates are consistent with the scheme parameters.
3	Former employer	Check that name of former employer is present.
4	Marital status	Ensure marital status is recorded to determine correct calculation of dependant benefit.
5	Type of pension (e.g. normal, ill-health, pension credit)	Check that retirement type is present, in order that the benefits applicable to the member can be ascertained.
6	FS pay at date of leaving	Check that final pensionable salary calculated at date of exit is present.
7	Date pension began (FS)	Check that date pension started is present and is after date joined scheme. Systems need to take account of partial retirements.
8	Pre-commutation pension (FS)	Check that a total gross pension is present (either derived or explicit) - initial basic final salary scheme pre-commutation pension.
9	Initial pension (FS)	Check that a total pension is present (either derived or explicit) - basic final salary scheme pension at retirement after commutation. Split by tranches of accrued pension (e.g. APBs) including separate records of any debit and credits.
10	Current pension (including PI) (FS)	Check that this is present, split by tranches of accrued pension (e.g. APBs) including separate records of any debit and credits. The sum of the individual components must equal any total pension that is recorded on the system.
11	<a href="#">Commutation factor</a>	Check that GAD factor used to calculate lump sum is recorded.
12	Commutated lump sum	Check that amount of lump sum paid in lieu of final salary scheme pension is present and consistent with factor/ amount commuted.

13	Injury award	Check details of any injury award in payment at the date of assessment. This should include the degree of disablement and any deductible state benefits.
14	Date CARE pension began	Check that date pension started is present and is after date joined scheme. Systems need to take account of partial retirements.
15	Pre-commutation CARE pension	Check that a total gross pension is present (either derived or explicit) - initial basic 2015 scheme pre-commutation pension.
16	Initial CARE pension	Check that value at date of exit is present, including revaluation to date of exit.
17	Current CARE pension (including PI)	Check that current value is present and includes any relevant PI.
18	Commutated lump sum	Check that amount of lump sum paid in lieu of CARE scheme pension is present and consistent with factor of 12/ amount commuted.
19	PSOs/ Earmarking	If a member has had a pension sharing or earmarking order, check that full details of the benefits transferred/ to be paid to the ex-spouse/ex-civil partner are recorded.
20	Scheme pays debits	Check that details of any scheme pays debits are recorded including amount of tax charge and annual pension debit.
21	Contracted-out date	Check that this is present and not earlier than 06/04/1978.
22	Pre/ Post-88 GMP	Check that a member with at least one month of pre 4/88 contracted out service has a pre-88 GMP. GMP must be divisible by 52. May be derived if total GMP and post 4/88 GMP are recorded. Check that a member with at least one month of post 4/88 service contracted out on a GMP basis has a post 88 GMP. Can be derived or explicit.
23	Date GMP revalued to	Check that a revaluation rate is present for each element of GMP.
24	LTA charge paid	Check that the date and amount of any lifetime allowance charge paid is present.
25	UP details	Check that full details are recorded if an unauthorised payment has been made. Details will include the nature, date and amount of the payment.

<b>FPS 2006 SPECIAL MEMBERS</b>		
	<b>Data item</b>	<b>Comment</b>
26	Retained option election	An indicator should be present to identify that the member elected to purchase benefits under the retained option.
27	Settlement format	Indication of whether by lump sum or periodic contribution.

## **DEPENDANT**

	<b>Data item</b>	<b>Comment</b>
1	Deceased's scheme at leaving – 1992, 2006 (Standard), 2006 (Special), 2015	Check that membership class is present, if it is required in order to define the class of membership, from which the scheme rules and benefits applicable to the member can be ascertained.
2	Deceased's former employer	Check that name of former employer is present.
3	Deceased's NI number	'TN' formats should be regarded as missing data. The final character of NI numbers is not essential.
4	Dependant type	Check that dependant type is present, in order that the benefits applicable can be ascertained.
5	FS derived pension	Check that a value is recorded for dependant's final salary scheme pension, excluding any injury pension payable.
6	CARE derived pension	Check that a value is recorded for dependant's CARE scheme Pension at valuation date, excluding any injury pension payable.
7	Injury award	Check details of any dependant's injury award (DIS only).
8	Partner's Pre/ Post-88 GMP	Check that a member with at least one month of pre 4/88 contracted out service has a pre-88 GMP. GMP must be divisible by 52. May be derived if total GMP and post 4/88 GMP are recorded. Check that a member with at least one month of post 4/88 service contracted out on a GMP basis has a post 88 GMP. Can be derived or explicit.
9	Date GMP revalued to	Check that a revaluation rate is present for each element of GMP.

## Measuring accuracy

In order to calculate your data score, data has to be both present and accurate. Your score will be the percentage of scheme members you assess to meet these criteria for all data items, measured in each category. Testing for the presence of data is relatively straightforward, however, testing for accuracy is subjective and will require some measure of judgment.

TPR guidance<sup>3</sup> suggests that accuracy may be measured by the presence of sufficient processes and controls to ensure the quality of new and historical data. For the Firefighters' Pension Scheme we have categorised four areas in which you can measure accuracy.

- Checking you have data in all the fields you expect in order to establish entitlement

**A drop in pay<sup>4</sup>:** Where a member has a drop in pay they may qualify for the two pension rule under the final salary scheme or pay protection for the final salary link if they have moved to FPS 2015.

However, an administrator may not be aware entitlement exists unless they have been specifically told by the employer that the member's pay has dropped. Therefore, to test for accuracy, you will need to assess whether there are processes in place to ensure the entitlement to benefit has been established.

**Data held on the software system:** Depending on how your score has been calculated, i.e. whether this is an automated feature or involves manual work from your administrator, you should check that all data about the member has been included. For example, when special members of the FPS 2006 were first introduced, this data did not necessarily sit on the administration software and in some cases was held on spreadsheets. In order to test for accuracy and that you are testing the data you would expect to be there you need to ensure that special members of the FPS 2006 have been included in the measurements. In order to do that you should consider what processes are in place to ensure the data is present and accurate.

**Additional Pension Benefits (APB)<sup>5</sup>:** Does the member receive payments that would qualify for an APB and how is this information shared with the administrator? For example, the absence of an APB is not necessarily inaccurate for a member who is not in receipt of CPD payments or a temporary promotion.

To summarise, you will need to consider what processes are in place to order to ascertain that where a member has entitlement to a benefit and that the information needed to calculate that benefit is present

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<sup>3</sup> <https://www.thepensionsregulator.gov.uk/en/trustees/managing-db-benefits/governance-and-administration/record-keeping/review-your-scheme-data>

<sup>4</sup> <http://www.fpsregs.org/images/admin/TwoPensionsv1.pdf>

<sup>5</sup> <http://www.fpsregs.org/images/admin/APBv1.pdf>

Consistency checks – data items must be consistent with each other, for example the date a member joined the scheme must be later than their date of birth, and prior to their expected retirement date.

**Tolerance checks:** You may wish to consider the processes for consistency checks for pay, for example many administrators may establish a tolerance check that checks for pay increases or decreases within a certain percentage.

- Validation checks – data items should be in a valid format, for example the two letter prefix of the national insurance number needs to match the two letter prefixes used by HMRC.

**Monthly reconciliation:** Monthly reconciliation means the process of providing to the administrator monthly data about the member; this includes starters, leavers and pay. This allows the administrator to check the data on a frequent basis rather than waiting for the year end data load. Using an automated process that takes employee data from the payroll system and uploads to the administration system and then checks for tolerance matches on a monthly basis is likely to result in more accurate data.

**Returns to employer:** You may also want to use the amount of errors returned to the employer to consider the likelihood of accuracy. For example, an administrator with multiple clients may experience a higher error return rate for some clients than others.

**Member feedback from communications:** As owners of their own data, members are the ideal person to check for accuracy. It is recommended to record how many queries are received after a communications exercise (such as issuing Annual Benefit Statements) to see if members have noted inaccurate data used in the calculation of their benefits.

- Specific processes to check data

**Routine checks:** Ensuring processes are in place for routine checks, such as regular existence checks, or checking members' dates of birth, e.g. against birth certificates, at the point benefits are taken.

**Reconciliation between administrator and employer data:** Both the employer and administrator hold data about a scheme member. Regular (i.e. annual) reconciliation checks ensure that the data is accurate and up to date.

**Contracted Out reconciliation:** After contracting out ended in April 2016, schemes were required to reconcile the data they held about contracted out members with the data HMRC held. In some cases schemes found they had missing data. Experience from that exercise should be fed into a test of accuracy, if schemes are still waiting to fully reconcile their data against HMRC's data.

Administrators should report regularly to FRAs on the outcome of their data quality controls. Any key data item identified as absent or likely to be incorrect, should be verified with the relevant member or employer.

## Adjusting your score for accuracy

Having considered the categories for accuracy, you then need to measure it and consider whether the score for presence should be adjusted. In order to do this each accuracy test needs to be weighted and the overall total used to adjust your data score.

The scale of weighting applied is on a scale of zero to ten and the table below indicates the indicia that could be used to apply the score. It is expected that each authority should make a reasonable judgment based on their experience in order to justify the weighting they apply.

	Processes / solutions	Experience
0	Solution / process in place for more than 12 months, fully automated where applicable.	0% percent of data returns to employer / queries from members received
1	Solution / process in place for more than 12 months, partially automated where applicable.	10% percent of data returns to employer / queries from members received
2	Solution / process in place for more than 12 months, manual process and checks apply.	20% percent of data returns to employer / queries from members received
3	Solution / process in place for more than six months, fully automated where applicable.	30% percent of data returns to employer / queries from members received
4	Solution / process in place for more than six months, partially automated where applicable.	40% percent of data returns to employer / queries from members received
5	Solution / process in place for more than six months, manual process and checks apply.	50% percent of data returns to employer / queries from members received
6	Automated solutions in early phase 0 to six months	60% percent of data returns to employer / queries from members received
7	Manual solutions in early phase 0 to six months	70% percent of data returns to employer / queries from members received
8	Awaiting implementation phase	80% percent of data returns to employer / queries from members received
9	Planning undergoing to consider processes / solutions	90% percent of data returns to employer / queries from members received
10	No processes / solutions in place	100% percent of data returns to employer / queries from members received

## Using the template

The excel template provided allows schemes to assess the likely accuracy of their data and adjust the scheme specific score accordingly.

1. Enter the data score to be adjusted in cell B1
2. Using the matrix above and the examples in the comments for each cell (right-click within the cell to show/hide the text) rate each test on a scale of zero to ten
3. a) If the average scaled score is below 3, then the data score will not be adjusted  
b) If the average scaled score is above 3, use the adjusted scaled score in cell B24.



Microsoft Excel  
97-2003 Worksheet

<http://fpsregs.org/images/admin/Data-score-weighting.xlsx>

Data Score	85
0 being processes in place 10 being none	
<b>Data as expected</b>	
Authority has processes in place to identify a drop in pay, triggering either a two pension entitlement (final salary scheme) or protected pay (final salary link for 2015 scheme)	10
FPS 2006 special member data held on system	1
Authority has process to identify APBs appropriately	10
<b>Consistency</b>	
Administrator tolerances for +/- % pay change	0
<b>Validation</b>	
Monthly reconcilliation	10
Number of returns to employer	4
Amount of Member queries rec'd after comms ie ABS	5
<b>Specific Processes</b>	
Routine checks	1
Reconcilliation between employer and administrators	10
Contracted Out reconcilliation experience	3
Accuracy Score	5.40
Weighting	5.4%

This factsheet has been prepared by LGA to give some informal guidance on completion of the annual TPR scheme return for the Firefighters' Pension Scheme. It is not intended as advice or a definitive 'how to' guide.

The following sources are acknowledged in the development of this factsheet: TPR, GAD, Aquila Heywood, LGPC.

Please address any queries on the content of this factsheet to [bluelight.pensions@local.gov.uk](mailto:bluelight.pensions@local.gov.uk)