

## TPR data requirements

### Background

For the first time in 2018, TPR are requesting that schemes measure the data they hold about their members and report this on the annual scheme return. To assist schemes in measuring their data, TPR have produced the following guide:

<http://www.thepensionsregulator.gov.uk/docs/measure-data-guide.pdf>

As you will be aware the 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.

TPR have recently published a [checklist](#) for completing the scheme return, which is expected to be issued in September with a six-week turnaround for completion.

It is important to remember that data scoring should not be considered a test of software or administrators, rather it 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 confirmed that the first year of data-scoring will be used as a baseline to assess the current position of scheme data. It will be used to review the methodology adopted by each scheme in both selecting and measuring their scheme-specific data. Thereafter, a year-on-year improvement will be expected.

There are two different categories of data– common and scheme specific. Please see more detail below.

### 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.

Although TPR have produced some general guidance on measuring scheme-specific data, there are no particular guidelines for the Firefighters' Pension Schemes.

<http://www.thepensionsregulator.gov.uk/docs/record-keeping-guidance-conditional-data-table.pdf>

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. This has proven more difficult than initially imagined, particularly within the available timescales, as robust testing is needed not only of the data that the administrator holds, but also items which may not be recorded on software.

Therefore, rather than provide a definitive list of data elements, we have given some suggested items below. This is based on the GAD Universal Data Extract and TPR guidelines, subject to feedback from software suppliers and our knowledge of the Firefighters' Pension Schemes. The suggestions are split into categories for active, deferred, pensioner, and dependant members.

TPR understand that this will be a reiterative process and therefore, this project will be revisited once the results of year one are known and we can build a clearer picture of what is achievable and realistic. Scheme managers will be given opportunity to review the process following the return submission deadline.

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

	<b>Data item</b>	<b>Comment</b>
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	Part time indicator and % FTE	Both or neither should be present, check that this is consistent.

13	APB amounts (including CPD, LSI and temporary promotion)	Check that amounts paid, period dates and calculated APB amounts are present.
14	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.
15	Accrued CARE pension from 01/04/2015 (or transition date)	Check that accrued benefit details are present if they are updated and recorded annually.
16	Annual revaluation percentage	Check that there is a history of revaluation percentage for the accrued pension for each relevant year.
17	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.
18	Scheme pays debits	Check that details of any future scheme pays debits are recorded including amount of tax charge and annual pension debit.
19	Potential entitlement to two pensions (reduction in pay)	Check that date of reduction and previous higher rate of pay is recorded if a potential entitlement to two pensions has been established.
20	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>
21	Retained option election	An indicator should be present to identify that the member elected to purchase benefits under the retained option.
22	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).
23	Converted special service	Details of service that was converted from standard to special service.
24	Settlement format	Indication of whether by lump sum or periodic contribution.
25	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	FS pay at date of leaving	Check that final pensionable salary calculated at date of exit is present.
9	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.
10	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.
11	Date payable (FS)	Check that deferred payment date is present and consistent with date of birth.
12	Initial CARE pension	Check that value at date of exit is present, including revaluation to date of exit.
13	Current CARE pension (including PI)	Check that current value is present and includes any relevant PI.

14	Date attains SPA	Should be the date the member reaches state pension age under current legislation, for payment of 2015 deferred benefit.
15	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.
16	Scheme pays debits	Check that details of any future scheme pays debits are recorded including amount of tax charge and annual pension debit.
17	Contracted-out date	Check that this is present and not earlier than 06/04/1978.
18	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.
19	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>
20	Retained option election	An indicator should be present to identify that the member elected to purchase benefits under the retained option.
21	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	Commuted 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.



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	Commuted 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.

## 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 suggests that accuracy may be measured by the presence of sufficient processes and controls to ensure the quality of new and historical data. The below paragraphs provide some guidance on the types of processes you might expect to have in place for Fire data and provides some illustrative examples of areas that you might want to examine more fully.

- Checking you have data in all the fields you expect.

In order to test for presence and accuracy you will need to establish entitlement, for example the absence of an Additional Pension Benefit (APB) is not necessarily inaccurate for a member who is not in receipt of CPD payments or a temporary promotion.

Likewise you will need to consider the two pension rule. An administrator may not be aware entitlement exists unless they have been specifically told by the employer that a member may be entitled to a two pension award due to a drop in pay, so you may first need to consider the employer process with regards to acknowledging entitlement to benefits and informing the administrator.

You will also need to consider any data that is not held on the software, for example we are aware that some Fire Authorities / pension administrators have established manual processes to administer special members of the 2006 scheme, and the data does not necessarily sit on the administration software. You would need to consider where this data is held and what processes are in place to ensure the data is present and accurate.

Therefore 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

- 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.

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.

To test for accuracy you may also want to consider the frequency of validation checks, for example, administrators who have established automated monthly data reconciliation processes will have more opportunity to frequently validate the data.

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.

- Specific processes, for example regular existence checks, or checking members' dates of birth, e.g. against birth certificates, at the point benefits are taken.

Your administrator should regularly report to you on the outcome of their quality controls. If any key data item is identified as absent or likely to be incorrect, it should be verified with the relevant member or employer.

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)