

## Standards – Guidance and Examples

### Data

#### Standard

#### 4.1 Member Data Quality Standard

#### Rationale

The administrator is able to demonstrate their policy for ensuring the highest level of member data quality standards are achieved and maintained for their clients supporting the effective delivery of administration services and compliance to regulatory and legislative requirements.

#### Outcomes

Outcomes should support the following:

- Accurate payments of benefits to members;
- Timely settlement of member and survivor benefits;
- Effective communication to members;
- Member data is held and transmitted securely and is protected from corruption and unauthorised disclosure;
- Effective management and mitigation of fraud risk;
- Compliance to TPR common and conditional data regulation and Data Protection Act requirements.

#### Measurement and Evidence

The administrator must have a document Data Management Policy which evidences the documented data security and integrity policy of the provider. The administrator should be able to evidence staff have been made aware of their obligations to protect client data and have been

appraised of their ongoing obligations under the Data Protection Act to ensure client data is protected, handled confidentially and any data transmitted is suitably protected from corruption and any fraudulent activity, in accordance with the provider's policy.

## General Principles

PASA believes a documented Data Management Strategy/Policy is necessary and supportive of a robust pensions administration service.

Providers need to be able to demonstrate their data management strategy/policy is clearly defined, implemented and maintained; they are monitoring the plan to ensure it remains fit for purpose; and they are proactive in ensuring staff are aware of their responsibility for the quality of client data.

PASA believes once data has been analysed and cleansed, providers should work with their clients to ensure data remains of a high quality. PASA also believes providers must ensure the integrity of recorded data is not affected by undertaking day to day administration.

## Application to TPAs and Accreditation Approach

The accreditation team will review:

- Evidence of a documented member data management policy;
- How the TPA facilitated the measurement, metrics and procedures to achieve the data standards;
- Evidence employees are aware of the policy and the implications of not complying;
- Evidence of the data analysis tools used and the results of any reviews undertaken;
- Evidence of systems access limitations, how these are managed and how access rights have been closed down for leavers of where access for an individual is no longer relevant to their role;
- Evidence of the segregation of client data;
- Evidence of appropriate mortality screening and 'living as stated' activity and results;
- Evidence of fraud risk identification and mitigation.

## Application to In House Teams and Accreditation Approach

The accreditation team will review:

- Evidence of a documented member data management policy;
- How the in-house team set the standards and procedures to ensure high quality data standards are achieved;
- Evidence employees are aware of the policy and the implications of not complying;
- Evidence of the data analysis tools used and the results of any reviews undertaken;
- Evidence of systems access limitations, how these are managed and how access rights have been closed down for leavers of where access for an individual is no longer relevant to their role;
- Evidence of appropriate mortality screening and 'living as stated' activity and results;
- Evidence of Fraud risk identification and mitigation.

## Timeline

PASA expects this Standard to be applied immediately