PASA Data Working Group

Dashboard Accuracy Data Guidance

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Dashboard preparation

1. Getting it right

Data is growing increasingly important in the administration of pension schemes. Some schemes are actively tracking their data score, they know where their gaps and inaccuracies are. However, many more, are still not actively managing their data. This is a problem because it's only as accurate as the last time it was validated. Some data points don't change after validation, such as National Insurance Number (NINO) and date of birth. However, other data items such as address, surname and sometimes forename can. You need to be able to accurately confirm your scheme's data is a match to dashboards' requests, making it vital the data held is accurate and has been validated.

2. How can schemes address this?

Firstly, it's vital your members' existence is confirmed. This will reduce the likelihood of overpayments, fraudulent claims or data breaches. Traditionally pension schemes have written to pensioner members and requesting details to confirm existence. This can be achieved more efficiently using the Government disclosure of death registration information (DRI) data available through third parties. It's also not a one of exercise, it's important member existence data is regularly screened.

Name, date of birth, NINO and address are all data points which should not only be present, but accurate. This will ensure any call from a dashboard gives an accurate match to the member's record held. All these items of data can and should be checked against the various data sources available. This type of service is available through third parties and it's very important to use the right data set to perform the checks. For example, GAIN information (a gone away database) may inaccurately or incompletely identify a gone away address. The use of Credit Reference Agency (CRA) Data is often an effective approach for pension schemes and can be accessed either directly from CRAs or alternatively through third parties offering additional services to support the process.

Consideration should be given to the address data, which can change frequently. Where schemes undertake regular address validation, they can have confidence in the accuracy of the address data held. But many schemes still only perform address tracing at the point they receive a gone away notification.

Under UK GDPR, data should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure inaccurate personal data is identified and corrected. Schemes should ensure data validation forms part of their Data Management Plans (**see PASA guidance**).

Identifying member duplications is crucial. It's possible a member may have multiple benefits either in the same scheme or different schemes administered by the same provider. Administrators need to make sure changes are replicated across their databases for all records held for a member.

The various data sources available can be checked by third party firms which provide services to pension schemes to accurately confirm if a pension member is alive or deceased, an address, date of birth, name, NINO. As a minimum, pension schemes should consider ensuring name, date of birth and NINO aren't only present, but also accurate to ensure the correct data is available to be searched by a dashboard enquiry.

The following lists provides example data sources which can be used to validate member information:

Shared data: provided by lenders or consumers themselves
- Land Registry
- Consumer Credit Account Information Sharing (CAIS)
- Current Account Turnover (CATO)
- Credit Application Previous Searches (CAPS / ECAPS)
- The Rental Exchange
- HD Decisions
- Cifas National Fraud Database
- Claims and Underwriting Exchange (CUE)

Public data: Can be taken from public records anyone can access
- The electoral register
- Registry Trust
- The Gazette
- The Insolvency Service
- Financial sanctions and PEPs data

Private data: Can be sourced from organisations who own the data
- BT Directory Solutions
- Mortality data
- CitizenCard
- Property data

3. Conclusion

As the dashboards launch dates creep ever closer, it's vital pension schemes review and take the necessary action to ensure the key matching data isn't only present but accurate. Accuracy testing and validation is a step further than typical pension scheme data reviews, but the guidance and resources above will help schemes navigate this. The PASA Data Working Group continue to advocate for more to be done in managing pension scheme data and encourage schemes to efficiently include this area of data actions into wider data review and improvement plans.

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