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PASA Experts for Data

PASA Data Working Group

Dashboards Data Accuracy Guidance

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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 data is 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 a members' existence is confirmed. This will reduce the likelihood of overpayments, fraudulent claims or data breaches. Traditionally schemes have written to pensioner members and requesting details to confirm existence. This can be achieved more efficiently, and with more tact, using the Government disclosure of death registration information (DRI) data available through third parties. It's also not a one off 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 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 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 schemes to accurately confirm if a 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 provide example data sources which can be used to validate member information:

Shared data: provided by lenders or consumers themselves

- **Land Registry:** provides ability to check property ownership
- **Consumer Credit header data:** name, address and DOB information provided by lenders to credit referencing agencies. Also includes:
 - 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)
- **National Change of address file** (available from Royal Mail): provided by consumers for redirection of post

Public data: Can be taken from public records anyone can access

- **The edited electoral register:** name and address information on residents who are registered to vote and have given their permission for their names to be disclosed (although requires physical data access for each local authority)
- **Registry Trust:** name and address information on county court judgements.
- **The Gazette:** official journals of record, consisting largely of statutory notices.
- **The Insolvency Service:** name, address and date of birth for current bankruptcies, IVAs and DROs.
- **Financial sanctions and PEPs data:** UK sanctions list available on gov.uk contains 48,000 people who have sanctions against them.

Private data: Can be sourced from organisations who own the data

- **BT OSIS file:** BT's directory information database, OSIS, holds more than 26 million residential and business names, addresses and telephone numbers.
- **Mortality data:** various data sets are available which contain deceased names.

- **CitizenCard:** database of 2.5 million UK citizens who have applied for a card, largely for age verification purposes.
- **Property data:** the property portals make their data available for use by 3rd parties, including address, house sale value / rental value, move in / move out dates

While schemes can use these data sources to review their data against other available data for consistency and accuracy, it can be challenging to access them directly. Analysis of the data available can be equally challenging. Third party data agencies use technology have the ability to access and interrogate large data sets, which can allow schemes to keep their own data up to date, supporting them in carrying out data accuracy analysis.

3. Conclusion

TPR expects schemes to continue preparing for dashboards, to get to grips with member data, and to work with those supporting them with their duties. TPR urges schemes to adhere to the connection timeline that will be set out in Guidance. To be ready, it's vital schemes review their data 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 data reviews, but this guidance and the sources above can help schemes navigate this. It's challenging for schemes to access and utilise the available data sources and it may be necessary to appoint a third-party agency. The PASA Data Working Group continues to advocate for more to be done in managing pension scheme data and encourage schemes to efficiently include this richer set of data actions in their wider data review and improvement plans.



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