



# Standards – Member Data Quality

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Sept 2024

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PASA 

## Standard:

### 4.1 Member Data Quality

Administrators should have robust data<sup>1</sup> quality and data management procedures in place. This ensures the accuracy, completeness and security of member data for operating systems, transferring data and accessibility. Data security is covered in more detail in Standard 3.2, Business Continuity Planning, where standards are set for protection of data against fraud.

## 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 Principals, supporting the effective delivery of administration services and compliance to regulatory and legislative requirements.

## General Principles:

A documented data management strategy/policy is necessary for and supportive of a robust administration service whether in house or outsourced to a third party. PASA published guidance on [Data Management Plans in March 2021](#) and a further update in [August 2022](#) and a knowledge of this documentation would assist PASA members wishing to apply for accreditation.

Appointed administrators need to demonstrate their data management strategy/policy is clearly defined, implemented and maintained and they're monitoring the plan to ensure it remains fit for purpose. They must be proactive in ensuring staff are aware of their responsibility for the quality of their Principals' data.

Once data has been analysed and cleansed, providers should work with their clients to ensure data remains relevant, appropriate and of a high quality. Appointed administrators must ensure the integrity of recorded data isn't affected by undertaking day to day administration.

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<sup>1</sup> Data is expressed to include member data, scheme data, client data, policyholder data, confidential information and any data of a sensitive nature

**Outcomes:**

Outcomes should support the following:

- Accurate payments of benefits
- Payment of the right benefits at the right time to the right people
- Effective communication to members using a method suitable for them
- Member data is stored, transferred and managed securely
- Effective management and mitigation of risk, including fraud risk (covered in more detail in Standard 3.2 Business Continuity Planning)
- Compliance to TPR common and scheme specific data requirements, client confidentiality requirements of any Governing Bodies and Data Protection regulation
- Compliance with emerging requirements of dashboards as appropriate to scheme connection timelines

**Measures/Evidence:**

The appointed administrator must have a documented Data Management Policy evidencing the data security and integrity policy. The appointed administrator should be able to evidence staff have been made aware of their obligations to protect data and have been appraised of their ongoing obligations under Data Protection regulations.

Where some or all services are outsourced to a third party provider, PASA expects the appointed administrator to have an appropriate and suitable data management strategy and policy documented and in place and for these requirements to be reflected in the agreement between the parties.

## Accreditation Approach:

### For TPAs:

- The Accreditation team will review:
  - Evidence of a documented data management policy, to include data security protocols for the transfer of data, including evidence of data mapping, risk identification and adoption of procedures to minimise potential risk
  - A Data Protection Officer has been appointed, if required
  - How the TPA facilitated the measurement, metrics and procedures to achieve the data standards
  - Evidence of ongoing training of employees to be aware of data protection and financial fraud requirements 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 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 appropriate to the level of data being provided

Where some of the services are outsourced to a third party, appropriate reporting and control information should be provided to the delegating party by the appointed administrator at regular intervals as defined in the agreement.

### **For in house teams:**

#### **The Accreditation team will review:**

- Evidence of a documented data management policy, to include data security protocols for the transfer of data including evidence of data mapping, risk identification and adoption of procedures to minimise potential risk
- A Data Protection Officer or contact has been appointed, if required
- How the in-house team set the standards and procedures to ensure high quality data standards are achieved
- Evidence of ongoing training of employees to be aware of data protection and financial fraud requirements 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 reviewed on a regular basis so access rights have been removed or adjusted when appropriate
- Evidence of appropriate mortality screening and 'living as stated' activity and results
- Evidence of fraud risk identification and mitigation

Where some of the services are outsourced to a third party, appropriate reporting and control information should be provided to the delegating party by the appointee at regular intervals as defined in the agreement.

### **For Master Trusts:**

#### **The Accreditation team will review:**

- Evidence of a documented member data management policy, to include data security protocols for the transfer of data
- How the appointed administration team set the standards and procedures to ensure high quality data standards are achieved
- Evidence of ongoing training of employees to be aware of data protection and financial fraud requirements 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 and how these are managed and reviewed on a regular basis to ensure access rights have been removed or adjusted when appropriate
- Evidence of appropriate mortality screening and 'living as stated' activity and results
- Evidence of fraud risk identification and mitigation

Where some of the services are outsourced to a third party, appropriate reporting and control information should be provided to the delegating party by the appointed administrator at regular intervals as defined in the agreement.

### **For Annuity Providers:**

**The Accreditation team will review:**

- **Evidence of a documented member data management policy**
  - **How the administration team set the standards and procedures to ensure high quality data standards are achieved**
  - **Evidence employees of the appointed administration 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 reviewed on a regular basis to ensure access rights have been removed or adjusted when appropriate**
- **Evidence of appropriate mortality screening and 'living as stated' activity and results**
- **Evidence of fraud risk identification and mitigation**

Where some of the services are outsourced to a third party, appropriate reporting and control information should be provided to the delegating party by the appointed administrator at regular intervals as defined in the agreement.



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