

PASA Consultation Response

TPR Enforcement Strategy Consultation

Oct 2025

PASA 



PASA Consultation response

Section	Content	Page
1	Summary	1
2	Consultation questions and responses	2

Acknowledgments

PASA is grateful to the authors of the response, the members of the PASA Industry Policy Committee (IPC) and their employers.

Gareth Stears (IPC co-Chair)	Aries
Ross Wilson (IPC co-Chair)	Gallagher
Grant England	Mercer
Rosie Kwok	LCP
Uche Egenti	RailPen
Natasha Moss	Delta FS
Andrew Palmer	Bravura Solutions

About PASA

The Pensions Administration Standards Association (PASA) was created to provide an independent infrastructure to set, develop, guide and assess administration standards.

PASA acts as a focal point and engages with industry and government to create protocols for understanding good administration - but also appreciates there's no one size fits all. PASA develops evidential Accreditation practices allowing benchmarking across and between the industry regardless of how the administration is being delivered.

As well as raising the profile of pension administration generally, PASA focuses on three core activities:

1. Defining good standards of pensions administration relevant to all providers, whether in-house, third party or insurers
2. Publishing Guidance to support those standards
3. Being an independent Accreditation body, assessing the achievement of good standards by schemes

There's no organisation providing such services across schemes, yet there's a demand for evidence of service quality from scheme trustees, sponsors, administrators, insurers, savers and regulators.

1 Summary

PASA supports TPR's proposed enforcement strategy, especially its focus on saver outcomes, proportionality and early intervention. A clearer distinction between issues best addressed through Guidance and those requiring enforcement, a regular review of priorities and safeguards against over-reliance on data would strengthen the approach further.

The established work of industry bodies such as PASA and the Pensions Management Institute (PMI) should be embraced. PMI sets education standards, while PASA sets and evaluates administration standards, provides an accreditation programme and industry Guidance. Aligning enforcement with these frameworks avoids duplication, reduces burden and ensures consistent, practical routes to compliance.

Success should be measured by improvements in saver experience e.g. fewer complaints, better data, faster transfers and wider adoption of standards, not just by enforcement actions.

2 Consultation questions and answers:

Q1. Do you agree with the overall direction of the proposed enforcement strategy?

We agree with the overall direction of the strategy, particularly its focus on saver outcomes, proportionality and early intervention. The shift toward risk-based, outcomes-driven regulation aligns with PASA's emphasis on practical standards and Guidance which prevents harm before it arises. This approach will help raise standards consistently across the industry and reinforce saver confidence.

Q2. Is our approach sufficiently transparent and accountable?

Transparency is vital to building trust and we support TPR's commitment to publishing enforcement outcomes and clarifying expectations. TPR should ensure communications are accessible not only to industry professionals but also to savers who may not have specialist legal or regulatory expertise.

Q3. Does the strategy clearly explain how enforcement decisions will be made and prioritised?

The framework of impact, scale and complexity provides a logical basis for prioritisation. TPR should explicitly reference the role of administration quality and data integrity as factors in assessing risk. Failures in administration often manifest as systemic risks affecting large numbers of savers and prioritising these areas would reinforce the importance of robust administration standards.

Q4. Are there any areas where the proposed strategy could be clearer or more accessible?

The strategy should be clearer in distinguishing between regulatory breaches best addressed through guidance and education, versus those requiring formal enforcement. PASA's Guidance aims to have frameworks in place to ensure issues can be resolved through early, practical intervention. Explicitly recognising this distinction would help schemes understand when enforcement is likely and when collaborative improvement is preferred.

TPR should clarify the meaning of 'monitoring outputs' in 'Putting saver outcomes first'. It's not clear what's being replaced by 'real-world outcomes'. While the latter sounds positive, it's important to know what might now receive less attention. If certain outputs are no longer tracked, they could become blind spots.

In the section 'Working together to solve problems', it would be useful for a real-world example of how the new, more collaborative approach differs from how the problem was approached previously. It would be useful to define the limits of collaboration. Being collaborative doesn't mean consulting everyone on every decision. Clear boundaries will ensure efficiency.

In 'Being open about what we do', it's unclear how enforcement publications will be 'optimised'. It would help to define what 'optimum' means. Is the focus on timing, format, accessibility or reach. Similarly, 'timely' could mean prompt, but might also refer to strategic timing. Using more objective language would avoid confusion.

Q5. How well does the strategy align with the broader shift toward a prudential, risk-based regulatory model?

The strategy aligns well with a prudential, risk-based model. The emphasis on acting earlier to prevent harm, mirrors PASA's approach to embedding standards before risks crystallise.

TPR should do more to proactively engage with and embrace the positive work of industry bodies such as PASA and the Pensions Management Institute to ensure professional standards and education underpin this regulatory shift.

Q6. Are there any risks or unintended consequences arising from the new strategy?

One risk could be smaller schemes or administrators perceiving enforcement as overly punitive, particularly where resources are limited. To mitigate this, TPR should continue to emphasise proportionality and provide clear signposting to practical guidance and standards. This will ensure enforcement drives improvement rather than disengagement.

Setting enforcement priorities could create risk. If an issue isn't seen as a priority now, it may be overlooked, even if it becomes more significant later. Semi-regular review of priorities would help manage this. It keeps the strategy responsive and avoids blind spots.

Using data to support decisions brings its own risks. There's a danger in trusting data too much, especially if it's assumed to prove something it doesn't. Data shows the past, but the past isn't always a guide to the future. PASA recommends sense-checking insights and randomising selection to avoid confirmation bias. This ensures decisions are balanced and evidence-based.

Q7. Are there additional safeguards or clarifications you would like to see?

TPR should provide greater clarity on how coordination with other regulators and industry bodies will take place to avoid duplication or conflicting expectations. PASA's Accreditation framework already provides independent evaluation of administrators against defined standards. Recognising and leveraging such frameworks would reduce regulatory burden while reinforcing accountability.

Q8. How can we best measure the success of this strategy in delivering real-world outcomes for savers?

Success should be measured not only by enforcement actions taken but also by improvements in saver experience and scheme compliance. Metrics could include:

- Reduction in complaints linked to administration errors
- Improvements in data quality and transfer times
- Increased uptake of accreditation or adherence to recognised standards
- Evidence of behavioural change across schemes and administrators

PASA would be pleased to collaborate on developing practical indicators which reflect saver outcomes.

Q9. Which enforcement policies should be prioritised for review?

Policies linked to administration quality and saver outcomes should be prioritised. This includes transfers, data standards and trustee accountability. These areas are central to saver confidence and align with PASA Guidance.

Q10. Do you have any other comments, suggestions, or concerns?

TPR's commitment to collaboration and early intervention is welcomed. The strategy will be stronger if it explicitly embraces the role of industry bodies such as PASA and PMI. PMI's education standards and PASA's administration Standards, Accreditation and Guidance, already provide the tools to raise professionalism and consistency. Aligning enforcement with these frameworks avoids duplication, reduces burden and gives trustees and administrators clear routes to compliance. This collaborative approach delivers better outcomes for savers and reinforces confidence in the pensions system.

This is an opportunity for TPR to consider paying extra attention to the SSAS market. The honest brokers in that segment of the industry would welcome closer inspection as those using the arrangements as liberation vehicles tarnish everyone. Being HMRC registered doesn't provide complete reassurance and closer inspection is required to reveal the bad actors.



Get in touch:

info@pasa-uk.com

www.pasa-uk.com