PASA Data Working Group

The 6 Data Quality Dimensions for Pension Scheme Member Data

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Our Experts for Data:

PASA

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Use of AI in Pensions Administration – Embrace the Opportunity with Caution

1. Introduction

Data quality is a fundamental aspect of effective management and strategic planning in various sectors, and this couldn't be truer for the pensions industry. High-quality data is indispensable for ensuring accurate benefits, regulatory compliance and maintaining stakeholder trust.

The Pensions Regulator (TPR) expects schemes to review and assess the quality of their members' data regularly, at least as part of annual data scoring process. TPR also expects schemes to update, verify and review data promptly following major events or upon the collection of new data, like annual employer returns, retirement or death.

TPR's latest Member Data Quality Guidance signposts schemes to assess the quality of data against six key dimensions. This paper explores these dimensions further in managing scheme member data, highlighting how they contribute to streamlined operations, precise calculations and improved relations.

2. Dimension 1 - Accuracy

Refers to the extent to which data correctly reflects real-world values or facts

Accuracy ensures pension scheme records, such as member names, addresses, dates of birth, National Insurance numbers (NINO's), contributions and accrued benefits match exactly. In this context, accuracy is vital as any discrepancies can lead to incorrect pension calculations with consequences for both the saver or pensioner and the scheme provider. Accuracy aids in maintaining trust and satisfaction among savers and it's important to check key data fields against reliable sources. For example:

An incorrect date of birth may result in a member receiving benefits earlier or later than entitled, impacting both them and scheme funding (in a DB scheme)

- A mismatched NINO can prevent proper HMRC reporting, affecting tax relief and compliance

Under GDPR, inaccurate personal data must be rectified without delay. Schemes must ensure accuracy to avoid breaches, maintain trust and comply with data subject rights.

Accuracy checks are vital for good quality saver data. However, they're arguably the most difficult checks to run for some areas of data. PASA has previously released Guidance on accuracy checks for data and benefits which are linked here:

https://www.pasa-uk.com/wp-content/uploads/2024/06/PASA-DWG-Data-Accuracy-vs-Data-Presence-FINAL.pdf
https://www.pasa-uk.com/wp-content/uploads/2023/08/Data-into-Benefits-FINAL-1.pdf
https://www.pasa-uk.com/wp-content/uploads/2023/08/Dashboard-Accuracy-Data-Guidance-FINAL-2023.pdf

3. Dimension 2– Completeness

Having all required data available and filled out without omissions

For schemes, this means all necessary information regarding their members' personal details, employment history, contributions and required data is fully documented. Incomplete data can lead to administrative errors and incorrect pension payouts. Ensuring completeness also helps avoid the financial and administrative pitfalls associated with incomplete data records. For example:

- Missing employment end dates can prevent accurate calculation of deferred benefits or eligibility for retirement
- Omitted marital status may affect survivor benefit entitlements and lead to underpayments or disputes

GDPR requires data collected to be adequate, relevant, and limited to what is necessary. Incomplete data may violate this principle and hinder the ability to fulfil data subject rights.

4. Dimension 3 – Consistency:

Involves ensuring uniformity in data over time and across different datasets and systems

Consistent data helps to avoid discrepancies between records, such as contribution histories, membership status and entitlement calculations. This ensures coherent and reliable scheme member statements and communications. Consistency means data doesn't contradict itself across different records or systems and savers don't see or receive different information from different platforms (e.g. via a saver portal, pensions dashboards or annual benefit statements). Consistency is crucial for maintaining saver trust and operational efficiency. For example:

- Different addresses across payroll and pension systems may result in lost communications, fraud or GDPR breaches
- Inconsistent contribution histories between employer records and scheme databases can lead to incorrect benefit accruals

Inconsistent data can lead to processing errors and breaches of GDPR principles, particularly around data accuracy and integrity. Schemes must ensure consistency to maintain compliance and operational reliability. There should be processes in place to check the consistency of data received, ongoing records and saver facing platforms.

5. Dimension 4– Timeliness:

How promptly data is captured and made available for use

Timely data collection ensures saver records are updated swiftly following any changes such as salary adjustments or employment status. This is crucial for accurate real-time decision-making and reporting and can impact retirement planning, benefit disbursements and regulatory compliance. For example:

- Delayed notification of salary changes can result in incorrect DB accruals or contribution levels
- Late updates to saver status (e.g., retirement or death) can lead to overpayments or missed benefit entitlements
- Delayed data updates can result in inaccurate scheme valuations and therefore funding decisions

GDPR mandates personal data be kept up to date. Delays in updating data can result in non-compliance and affect the accuracy and fairness of data processing.

Schemes should have processes in place to enable timely collection of data, whether from employers, savers or from external data tracing sources. Where data delays arise, there should be clearly documented plans in place to take corrective action quickly.

6. Dimension 5 – Uniqueness:

No replication or duplication within data sets

Uniqueness protects against duplicate records or erroneous data which could lead to calculation inaccuracies or data security issues. For example:

- Duplicate records due to name variations (e.g. Jon Smith vs. Jonathan Smith) can result in double counting or missed communications
- Multiple pension accounts for the same saver without proper linking can cause fragmented benefit calculations
- Duplicated salary, contribution, transfer-in or pension value records could result in over or underpayments and lead to unnecessary distress and potentially compensation payments

Duplicate records can lead to unauthorised access or incorrect data processing, violating GDPR principles of data minimisation and integrity. Schemes must ensure uniqueness to protect their member data and avoid breaches.

7. Dimension 6 - Validity:

Assesses whether data conforms to defined formats or requirements

Data validity ensures all entries meet structural requirements such as correct NINO, dates of birth are in date format and realistic, contribution amounts adhere to expected formats and range limits and retirement age thresholds are met. Validity minimises the risk of errors in processing and ensures data adheres to legislative and organisational policies. For example:

- Invalid date formats (e.g. 32/13/2020) can cause system errors and prevent benefit processing
- Contribution amounts outside expected ranges may indicate data entry errors or fraud

Invalid data can hinder accurate processing and violate GDPR requirements for data accuracy and integrity. Validity checks should be run upon the collection of new data.

Data must conform to expected formats and logical rules. For example, NINOs must follow HMRC standards. Invalid data can disrupt systems and lead to non-compliance.

8. A holistic approach

Applying these six dimensions of data quality to scheme member data helps ensure every aspect of a scheme runs smoothly, supports compliance with regulations, and protects all member interests. Accurate, complete and timely data enables administrators to calculate benefits correctly and efficiently, avoiding costly errors. Consistency and validity in the data uphold the scheme's integrity and fairness, while uniqueness prevents critical confusion and duplication.

Together, these dimensions form a holistic approach to managing data quality in pension schemes, ensuring systems function optimally and provide reliable, fair outcomes for all stakeholders involved. By embedding these principles into data management practices, schemes can enhance their operational effectiveness, safeguard their members' interests and meet regulatory standards effectively.

References:

- UK Government. (n.d.). Meet the data quality dimensions. Retrieved from https://www.gov.uk/government/news/meet-the-data-quality-dimensions
- TPR: Member Data Guidance: https://www.thepensionsregulator.gov.uk/trustees/contributions-data-and-transfers/scheme-member-data-quality

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