

PASA Data Working Group

Discussion of TPR's New Member Quality

Guidance with TPR & PASA:

Q&A from Webinar



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Produced in partnership with:



Our Experts for Data:

PASA The PASA logo symbol is a stylized, vertical monogram that combines the letters 'P' and 'A' into a single, elegant shape.

Acknowledgements

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Introduction

Data quality is a fundamental component of effective management and strategic decision-making across the pensions industry. High-quality data is essential for ensuring accurate benefits, regulatory compliance and maintaining the confidence of savers, pensioners and other stakeholders.

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

In November 2025, PASA hosted a webinar exploring TPR's new [Scheme Member Data Quality Guidance](#). The session featured You Yu - Policy Delivery Lead at TPR, Kristy Cotton - Chair of the PASA Data Working Group and Amanda Asante - PASA Board Director. The panel discussed TPR's expectations for managing data quality and shared practical insights on how schemes and administrators can meet these requirements in practice.

This Q&A document brings together the questions raised during the webinar and the responses provided by the panel. It's intended to support schemes and administrators in interpreting the Guidance and applying it in a proportionate, practical way.



Measuring & Understanding Data Quality

Which data sources are recommended for measuring data accuracy?

Where this relates to scheme-specific data, there are no prescribed or recommended sources. Schemes are expected to determine appropriate measures of data accuracy and acceptable tolerances based on the scheme's own circumstances, benefit structures and operational requirements.

To support this, PASA has published Guidance:

- [Data Accuracy vs Data Presence Guidance](#)
- [Dashboards Data Accuracy Guidance](#)

Does the TPR have a view on what schemes should do to assess data accuracy rather than data presence?

The presence of a data item doesn't necessarily mean it's accurate or reliable. Accuracy means data should reflect reality, at the point it's collected and remain accurate over time.

Schemes should take proportionate steps to obtain reasonable assurance key data items are correct. This may include verification against reliable sources where appropriate, i.e. confirming a member's date of birth against identity documentation. While some data items are largely static (such as date of birth) others (such as contact details) can change over time and require ongoing maintenance. Schemes should therefore have established processes in place to capture updates and to identify potential inaccuracies through routine use of the data, i.e. returned post, undelivered emails, or queries raised during administration processes.

Data accuracy should be assessed as part of a rounded view across all six quality dimensions, rather than focusing only on presence or completeness.

Key Takeaway – Measuring Data Quality

- Accuracy and presence aren't the same
- Proportionate assurance is expected, not perfection
- Data quality should be assessed across multiple dimensions



Regulatory Expectations & Thresholds

Following the latest exercise, has TPR formed a view on the minimal data quality thresholds (for example measurable values or percentages) which would support a 'Go' decision on the Dashboard Availability Point (DAP) to DWP? Should any such minimum thresholds be shared with schemes to clarify baseline expectations, even when schemes aim to exceed them?

This question raises two related points: minimum data quality expectations and what these mean for dashboards.

TPR hasn't set out a single minimum data quality threshold, as expectations depend on each scheme's individual circumstances. Where historical data issues exist, schemes aren't automatically failing regulatory expectations, provided there's a robust and credible data improvement plan in place.

Rather than prescribing numerical thresholds, TPR focuses on the actions schemes should be taking. Administrators should understand the true quality of scheme data, identifying gaps and putting robust plans in place to measure and improve data where required. Established processes should monitor data on an ongoing basis ensuring it's as accurate and complete as possible.

Data quality is critical to the success of dashboards. Without good data, savers may be unable to find their pensions or receive an inaccurate picture of their savings, affecting their ability to plan effectively for retirement.

TPR has engaged with the 51 largest schemes to better understand dashboards preparation, the work involved and areas of emerging good practice. User testing is now taking place, and the findings will feed into DWP's consideration of dashboards readiness.

When considering DAP, the focus is on the effectiveness of overall user experience. This depends not only on good quality data, but the totality of what users see, whether the information is understandable and if it clearly supports any further actions savers may need to take.

TPR is actively reviewing its Data Quality and Dashboards Guidance to reflect good practice and highlight areas where standards may need to improve. Schemes are encouraged to check the relevant guidance regularly for updates.

Based on its proposed definition, would 'singularity' be a more accurate term than 'uniqueness' for one of the six data quality dimensions?

While it's recognised organisations may define quality dimensions in different ways, the six Data Quality Dimensions referenced by TPR align with those recommended by Government and defined by the Data Management Association UK (DAMAUK).

Key Takeaway – Regulatory Approach

- TPR focuses on behaviours and governance, not fixed thresholds
- Credible improvement plans matter where issues exist
- Dashboards readiness considers overall user experience



Data Improvement Plans & Reporting

Many schemes receive multiple data-related reports, such as a Common Data Report, Scheme Specific Data Report, Find Data Report and View Data Report, each identifying issues, recommendations and timelines. Data Improvement Plans (DIPs) may also set out similar information in a separate document. Could these reports be used to highlight data issues, with the DIP focusing on tracking and demonstrating measured progress, rather than duplicating content across multiple documents. Is this how these scheme communications are intended to support one another rather than repeating the same information?

Schemes should take appropriate action to understand and improve their data. PASA Guidance is intended to illustrate what a DIP could look like, rather than prescribe a fixed set of documents.

Where trustees already receive multiple reports, duplication for its own sake isn't necessary. Trustees should consider whether the reporting they receive collectively meets the requirements set out in the Guidance and whether it's proportionate and appropriate for their scheme.

When should we be implementing new best practice Guidance from PASA? We have just revised our plan - should we redo now or wait until next year?

This is an individual decision for schemes. Where a DIP is already in place and has been recently reviewed, a pragmatic approach would be to assess alignment with the latest Guidance and incorporate any key updates as part of the next scheduled review, rather than reworking it immediately.

Schemes should be confident their existing plan is appropriate, proportionate and capable of evidencing how data quality is being managed and improved. Trustees should ensure they can demonstrate this to TPR if asked, including the rationale for their approach and the actions being taken.

Key Takeaway – Improvement Planning

- Guidance supports, rather than prescribes, documentation
- Existing plans don't need to be reworked unnecessarily
- Proportionality and evidence are key



Roles, Accountability & Resourcing

The new guidance is very helpful for schemes and administrators and we've seen increased engagement as dashboards preparation progress. However, some schemes continue to be reluctant to approve the investment required to maintain and improve member data over time. How does TPR intend to monitor and enforce ongoing compliance with its expectations on data quality going forward?

Good quality scheme member data is essential to the effective running of a scheme. It helps scheme administrators make informed decisions and ensure compliance with regulatory requirements.

Trustees and scheme managers are expected to take an active role in data management and understand the quality of their scheme's data. Where significant improvement work is required, TPR recognises a phased and prioritised approach may be appropriate. This is reflected in [TPR's Scheme Member Data Quality Guidance](#) which includes considerations to help schemes determine the most appropriate approach.

Schemes should prioritise the data cleansing and improvement activity which has the greatest impact on member outcomes and core processes, aligned with the overall scheme strategy. Decisions should be evidence-based with a clear and documented rationale. Material data issues should be recorded in the risk register, with a clear audit trail demonstrating governance and progress. TPR may challenge this and take regulatory action where necessary.

Where an administrator has an established data improvement plan with priorities covering several schemes because of shared trends, how does TPR and PASA envisage this aligning with the DIPs' of individual schemes or trustees, particularly when their priorities may differ?

From a regulatory perspective, a practical approach would be for the administrator and trustees to hold a round table discussion identifying where efficiencies can be made with an agreement across the different schemes.

This may be particularly relevant where a third-party administrator has identified commonalities across schemes which can be addressed through coordinated work. However, trustees remain accountable for ensuring their scheme's approach is appropriate and proportionate and aligns with their scheme's specific circumstances and priorities.

Section 4 of TPR's Scheme Member Data Quality Guidance covers the factors schemes should consider when prioritising data quality improvement work. As set out in the Guidance, improvement plans and their objectives need to be considered in line with proportionality, timescales and cost considerations.

In your role as a Professional Trustee, what do you think are the biggest challenges for Trustees in meeting these data quality duties?

A key challenge is prioritisation. With multiple competing demands, deciding where to focus effort and investment can be difficult. However, data underpins almost every trustee project and should be given sufficient importance when setting priorities.

Key Takeaway – Governance & Accountability

- Trustees retain accountability for data quality
- Evidence-based prioritisation is essential
- Data should be treated as a strategic asset



Contact Details & Working with Employers

The guidance on keeping contact details up to date (particularly personal email addresses and phone numbers) was useful and the potential impact on employers is significant. However, a key barrier is many employers don't have established processes to capture personal email addresses and telephone numbers in the first place. From an administrator perspective, influencing employers to capture this information can be challenging. How does TPR envisage schemes and administrators working with employers to improve this, and how can this be supported through broader scheme and administration strategies?

Thank you for the feedback. TPR recognises working with employers can present challenges. Its section on 'maintaining data quality' includes considerations on working with employers, highlighting good practice including nominating a dedicated employer contact for administrators and improving communication channels.

The Guidance also suggests involving payroll representatives in relevant discussions to help resolve data issues efficiently.

We don't currently hold email addresses for members, as we don't currently use them and have concerns over communications not being received or read and also around data security (i.e. we

wouldn't send non password protected information). **Is it worth doing a data gathering exercise if it's unlikely we'll use it and it's just another data item to keep clean and up to date?**

The Guidance is clear schemes should hold at least one set of accurate contact details for members. The Guidance also sets out why the data items are required and how they support scheme governance. This should help schemes make decisions about which data items they need to maintain.

If existing contact details are effective and meet operational needs, it may not be necessary to hold additional data.

However, for schemes in scope for dashboards, personal phone numbers are one of the data items to be verified and can support matching. Schemes should use the Guidance to determine what contact details are appropriate for their circumstances.

Key Takeaway – Contact Data

- At least one reliable contact route is required
- Additional data should be held where it supports scheme objectives
- Employer engagement is a key enabler



Regulatory Engagement & Industry Feedback

In recent years TPR has been reluctant to publish standard blank templates for both DB and hybrid scheme annual returns, while continuing to introduce new and increasingly detailed questions each year. This can make planning challenging, particularly for third-party administrators managing large volumes of scheme returns. Would TPR, working with PASA, consider revisiting the provision of templates to support more effective planning and preparation?

Thank you for this feedback. The PASA Data Working Group will take this suggestion forward and raise it with the relevant team at TPR for consideration.

Context

This question reflects operational challenges faced by administrators managing large volumes of scheme returns, particularly as data requirements continue to evolve.

Key points for schemes

The updated Guidance reinforces good data quality isn't about meeting fixed numerical thresholds, but about understanding data risks, taking proportionate action and being able to evidence decisions.

Schemes should focus on governance, prioritisation and continuous improvement, supported by clear reporting and credible improvement plans. Where challenges exist, particularly around employer data or legacy issues, a pragmatic and well-documented approach will be key.

This Q&A is intended to help schemes and administrators apply the guidance confidently and in a way which reflects their individual circumstances.



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