
Backlog Healthcheck Report for the Surrey Pension Fund

ITM
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1 *Executive summary*

1.1 Overview

This report summarises the results of a data analysis and audit of undecided leavers undertaken by ITM for the Orbis Partnership (“the Client”) in respect of the Surrey Pension Fund (“the Fund”).

The objectives of the review are as follows:

- ▶ Analyse the complexity of the Fund’s undecided leaver backlog.
- ▶ Identify backlog and other cases requiring action amongst the frozen refund population.
- ▶ Assess general data quality amongst the frozen refund and undecided leaver population.
- ▶ Advise on actions required to resolve issues identified.

In addition to this report, a full analysis result breakdown, including a member matrix showing each record in scope with their test failures and passes, is provided separately.

1.2 Summary of findings

The primary findings of the analysis performed are as follows, and should be read in conjunction with the detailed findings in the remainder of the report:

- ▶ 22% of the unprocessed population overall, and 51% of undecided leavers are without notable data issues or complications. However, the overall number of undecided leavers (13,114) is very high as a proportion of the total number of active records (33,587).
- ▶ The implicit backlog in the frozen refund population is relatively small at only 7% of the total number of frozen refund records held. However, this is still 544 cases in absolute terms. In addition, 6 cases are coming up to the deadline under the 2014 Regulations for the Fund to actually pay the refund, a number that will inevitably grow as time goes on.
- ▶ A notable proportion of frozen refunds have some sort of data quality issue (47%). This is primarily due to missing contribution data and missing or ‘gone away’ addresses, with missing or inconsistent WTE pay figures for cases with final salary service a third cause.
- ▶ Similar end of year-related issues affect the 71% of undecided leavers found to have some sort of problem or complication. For example, 2,464 undecided leavers have either missing or inconsistent WTE pay figures for the final three years, 5,299 have a missing expected CARE accrual, 2,808 have missing contributions, and 2,251 have variable employment status either explicitly or implicitly recorded.
- ▶ There is a slight, but notable problem of re-joiners not always being matched to their existing identity on the administration system, leading to a separate identity and unassociated member records getting created (211 cases affected).

1.3 Key recommendations

- ▶ In order to make headway faster, undecided leavers without notable issue or complication should be focussed on first, in particular single record deferred benefits.
- ▶ A small project to eliminate the frozen refund auto-aggregation backlog should be considered. Further, an exercise should be considered to re-offer the refund for cases where the liability needs to be removed soon, either due to being a CARE scheme leaver coming up to their five year anniversary of leaving, or coming to age 75 etc.
- ▶ If this is not already administrative practice, subject to checks, consideration should be given to treating undecided leavers with less than two year's service who have nevertheless subsequently re-joined as *de facto* frozen refunds, and therefore, subject to auto-aggregation without being given the option of a refund or transfer out first.
- ▶ While administration data for the records analysed was overall generally good, the notable minority of frozen refunds in particular with some sort of data quality issue suggests that a broader full data audit covering all liability statuses may be prudent.
- ▶ Of particular concern with respect to general data quality of frozen refunds is the number of missing or 'gone away' address details. As similar issues affect the preserved benefit population, the Fund is undertaking a mortality and tracing exercise. The Fund may want to consider a carrying out the same exercise for the frozen refund population.

2 *Background*

2.1 Methodology

ITM uses its own Data Analysis and Reporting Tool (eDAaRT) to perform bulk testing of pension scheme data. eDAaRT imports data from any pension administration system and uses SQL-based queries to interrogate the data held. For the present analysis, we have used a mixture of standard data tests for active members and early leavers, combined with a set of scheme-specific ones that are focused upon LGPS early leaver and frozen refund scenarios under the 2008 and 2014 scheme regulations.

2.2 Data sources

The primary source data used was a full member extract from the Client's administration system (Altair), loaded and processed through eDAaRT. In addition, standard system decode listings were employed where applicable (service and CARE types, benefit codes, and so forth).

The second data source was Altair itself, access being granted for an ITM administrator to undertake a sample set of file reviews via inspection of member records and images. Covering a range of employers (small and large councils, non-council scheduled and admission bodies), this provided a rounded picture of data issues that would be encountered in tackling the leaver backlog.

2.3 Population breakdown

Across the entire Fund, 13,114 member records have a current status of undecided leaver (Altair status 2) and a further 7,311 of frozen refund (Altair status 9). This population breaks down as follows:

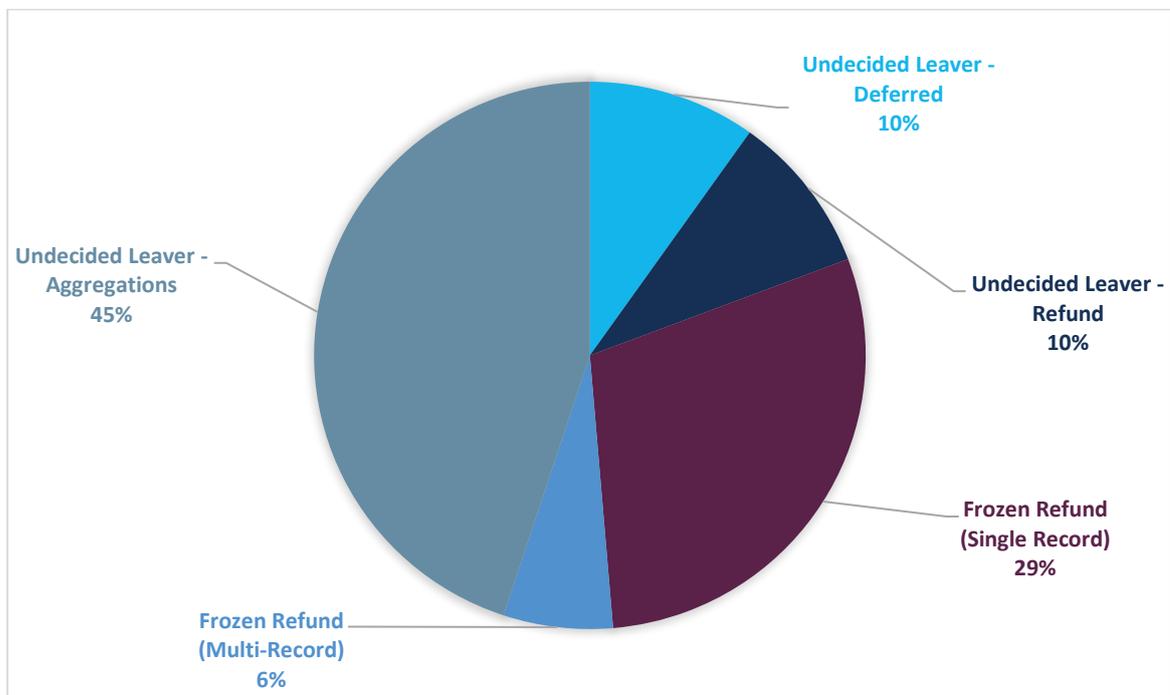
Liability Records for NI Number	Undecided Leavers (Refunds)	Undecided Leavers (Deferreds)	Undecided Leavers (Aggregations) ⁽¹⁾	Total Undecided Leavers	Total Frozen Refunds	Total Cases in Scope
1	1,972	1,965 ⁽²⁾		3,937	6,001	9,938
> 1	-	-	9,177 ⁽³⁾	9,177	1,310	10,487
				13,114	7,311	20,425

(1) Aggregations include concurrent and non-concurrent records

(2) Contains 49 deferred cases with the option of having a refund

(3) May include deferred cases, but unable to determine the final number until all prior aggregations are processed

The overall percentage of each case type is shown in the chart below:



3 Frozen Refund Analysis

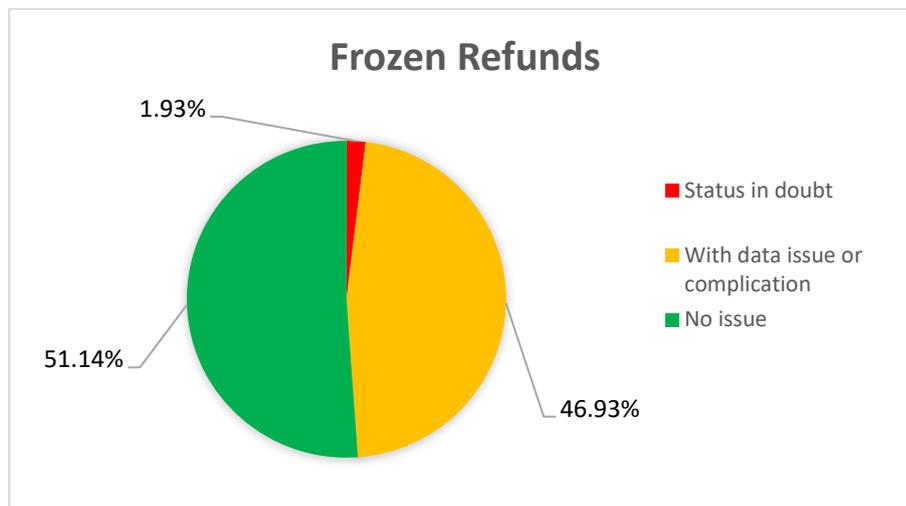
3.1 Introduction

The frozen refund population was analysed for the following purposes:

- ▶ Identify implicit backlog cases, in particular where the member has subsequently re-joined (or left under a concurrent employment), and auto-aggregation under the applicable scheme regulations applies.
- ▶ Within the first group, identify the splits between single and multi-record cases. This allows differentiating between more straightforward, quicker tasks, and those that are more complex and time consuming.
- ▶ Identify cases that, while not current backlog ones, will require action in the future, either due to a data issue, or because of a particular feature of the case.
- ▶ Across the population, assess general data quality with respect to common and scheme-specific data items material to the processing of each case type.

3.2 Results summary

Having prioritised individual tests in order to provide a headline result for each case, the results can be summarised as follows:



A breakdown of the issues found is provided on the following pages.

3.3 Common data quality issues

Issue	Total Cases
Address missing or marked gone away	2,184
Commentary: Consideration should be given to identifying all such cases across all frozen refunds and following up with a tracing exercise, like the one being performed on the deferred benefit population.	
DOB missing or inconsistent	5
Employer details missing or inconsistent	0
Forenames and initials missing or inconsistent	0
Sex missing or inconsistent with title	21
Surname missing	0
Variable employment status either explicitly or implicitly recorded	0
Commentary: Basic details are generally well recorded across the population. The exceptions however should be cleansed, for example most of the DOB discrepancies are where the recorded dates of birth and date joined scheme imply the member joined before age 16, which cannot be correct and may give reason to doubt the service/status dates the frozen refund was calculated against.	
NINo is missing, temporary or invalid	133
Commentary: An invalid NI number will make paying a refund problematic, especially if the member left under the 2014 Regulations where frozen refunds must be extinguished within five years of leaving. In addition, if uncorrected, this may lead to a second, unassociated identity for the individual being created in the administration data were the member to re-join, with the knock-on effect of making auto-aggregation scenarios harder to spot and process.	

3.4 Scheme-specific data quality issues

Issue	Total Cases
CARE accrual missing or unexpected	247
Commentary: These cases should be further investigated to confirm the reason for the discrepancy, and where necessary, recalculate the frozen refund.	
Contributions for one or more recent scheme years missing	77
Commentary: Completed employee contribution details would ordinarily be expected on a processed leaver record.	
Refund amount due not calculated	147
Commentary: A missing refund due amount implies that the frozen refund has not been processed correctly - what exactly has been 'frozen'?	
Service history inconsistencies	17

Issue	Total Cases
<p>Commentary: Any cases where a member's service history does not materially accord with their status history should be investigated to confirm which is correct, and where necessary, recalculate the frozen refund.</p>	
Unlinked Records	90
<p>Commentary: In principle, any one person should have only one identity on the administration system for all their ordinary scheme memberships. This avoids the potential for inconsistencies in common data. In addition, it is a prerequisite for calculations that work across multiple membership records to function. As such, unlinked records involving frozen refunds specifically may lead to required auto-aggregations being missed, or having to be completed in a manual fashion with greater potential for error.</p>	
WTE figure inconsistent or missing	1,158
<p>Commentary: Only cases with final salary benefits included. The appearance of completed, consistent WTE EOY pay figures would ordinarily be expected on a processed leaver record with final salary service. Conversely, one would not expect figures to appear for scheme years outside the record's own service period.</p>	

3.5 Status issues

Issue	Total Cases
Transfer in details missing or incomplete	40
Left after NRD, therefore processing as a short service refund would be an unauthorised payment under the Finance Act 2004	20
Deferred refund past due to be paid	31
Validity of deferred refund status is questionable	55
Commentary: These are cases that ostensibly should not be frozen refunds under the scheme regulations, and therefore form an implicit backlog distinct from the explicit backlog of the undecided leavers.	

3.6 Implicit backlog cases

Issue	Total Cases
Aggregation	398
Commentary: These are cases that should be subject to auto-aggregation under the scheme regulations, and therefore form an implicit backlog distinct from the explicit backlog of the undecided leavers.	

3.7 Future action cases

Issue	Total Cases
Deadline for frozen refund being paid under 2014 scheme regulations is upcoming	6
Commentary: A change in the 2014 regulations means frozen refunds for leavers going forward now need to be paid out within five years of the member leaving. The cases identified all left within the first three months of the CARE scheme.	

4 Undecided Leaver Analysis

4.1 Introduction

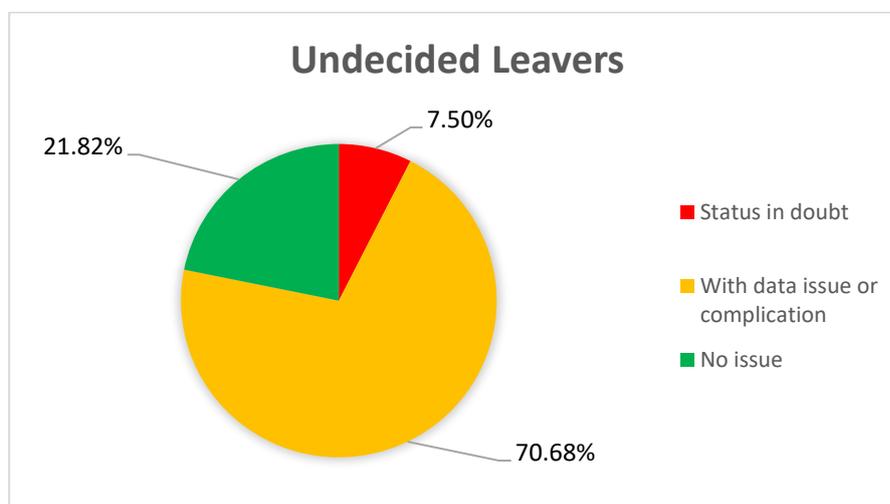
The undecided leaver population was analysed with the following purposes:

- ▶ Identify the splits between single and multi-record cases. This allows differentiating between more straightforward, quicker tasks, and those that are more complex and time consuming.
- ▶ Identify more complex cases, particularly (but not only) with respect to the rules around re-joiners and concurrent employments.
- ▶ Identify more time consuming cases.
- ▶ Assess general data quality with respect to common and scheme-specific data items material to aggregations.

Many of the tests performed were similar to those run against the frozen refunds. However, the implication of a test relevant to both can differ. In particular, while certain test failures (e.g. a missing address or CARE pay figure) can be especially concerning for a frozen refund due to its status as a processed leaver, the same issue with an undecided leaver is less of a concern. This is because the data in question should be confirmed on the leaver form, i.e. should be dealt with in due course. Nevertheless, such issues are still of note, as they suggest the case may take longer to process, for example due to a need to query the employer.

4.2 Results summary

Taking the undecided leaver population altogether, cases broke down as follows:



A breakdown of the issues found is provided on the following pages.

4.3 Common data quality issues

Issue	Total Cases
Address marked gone away	1,044
Address missing	108
Address not marked as overseas and postcode is missing, suspect or incomplete	22
Commentary: If the correct address is not confirmed on the leaver form, these issues should be confirmed with the employer when processing the form.	
Employer details missing or inconsistent	2
Forenames and initials missing or inconsistent	0
Surname missing	0
DOB missing or inconsistent	2
Sex missing or inconsistent with title	12
Commentary: Basic details are mostly well recorded across the population. Any issues identified should however be rectified when the leavers are processed.	
NINo is missing, temporary or invalid	23
Commentary: Invalid or suspect NI numbers should be reviewed when processing the leaver.	

4.4 Scheme-specific data quality issues

Issue	Total Cases
CARE accrual missing or unexpected	5,299
Commentary: These issues should be reviewed as part of the leaver processing and queried with the employer as applicable.	
Contributions for one or more recent scheme years missing	2,808
Commentary: A lack of fully recorded year end contribution figures means that pensionable pay figures provided on the leaver forms will have less scope to be easily checked, and may indicate unreliable data more generally.	
Service history inconsistencies	74
Commentary: These discrepancies between the Service and Status Histories on Altair should be investigated and queried with the employer as applicable.	
Unlinked records	211

Issue	Total Cases
<p>Commentary: In principle, any one person should have only one identity on the administration system for all their ordinary scheme memberships. This avoids the potential for inconsistencies in common data. In addition, it is a prerequisite for calculations that work across multiple membership records to function.</p>	
WTE figures inconsistent with each other	2,464
<p>Commentary: Only cases with final salary benefits included. The appearance of completed, consistent WTE EOY pay figures will allow pay figures provided on the leaver form to be properly verified, for example to identify that the employer has potentially failed to perform a 'best in last three' calculation where applicable.</p>	

4.5 Status issues

Issue	Total Cases
CARE accrual for scheme year held that postdates DOE	260
WTE figure for scheme year held that postdates DOE	49
<p>Commentary: The existence of postings that postdate the ostensive leaving date suggests the member did not in fact leave.</p>	
Transfer in details missing or incomplete	276
<p>Commentary: Cases that have an incomplete transfer record may be problematic for calculating correct benefits. These issues should be confirmed with the employer before processing case.</p>	

4.6 Other complications

Issue	Total Cases
Aggregation	5,128
<p>Commentary: Concurrent aggregations typically form the more complex sort of leaver case, particularly where final salary service is involved and therefore needs to be pro-rated appropriately. Potential auto- and default non-concurrent aggregation scenarios for re-joiners, while less complex than concurrent ones, will typically involve more effort to process than straightforward preserved benefit calculations.</p>	
Unprocessed leaver with three-way option of refund, TV out or preserved benefit on leaving	49
<p>Commentary: These are cases where service began under the 2008 scheme, lasted more than three months, but completed under the 2014 scheme with less than two year's service in total. As such, the member has the three-way choice of a refund, transfer out, or preserved benefits, per the 2014 Transitional Regulations.</p>	
Variable employment status either explicitly or implicitly recorded	2,251
<p>Commentary: In the main, variable status is explicitly recorded in the Altair data, however in a notable minority of cases (204) there is enough ambiguity to suggest a member is really a casual even if not explicitly shown as such on Basic Details. Without being explicitly coded, it is difficult to verify CARE benefit data in particular, because a line with blank CARE accrual may either be valid (because the member had no paid hours during the year) or invalid (because there was missing or broken data when the CARE calculation was run).</p>	

5 Individual Record Reviews

5.1 Sampling breakdown

In addition to the bulk analysis above, 50 sample file reviews were undertaken by examining Altair records and images. The results are as follows:

Employer	NI Number	Issues	Leaver Type	Further Comments
00008 - Windlesham Parish Council	NZ4722***	No leaver form	Deferred (Post 14 leaver)	
00014 - Merton and Sutton	WK4484***	None	Deferred (Post 14 leaver)	
00016 - Cranleigh Parish Council	NE8480***	CARE pay missing from leaver form and record	Deferred or aggregation (Post 14 leaver)	Member has a previous deferred record, however with a date of leaving in 1997 and therefore aggregating to re-establish a final salary link is not possible. Separate benefits can likely be assumed and a second deferred processed once the CARE pay issue is resolved.
00017 - Warlingham Parish Council	WB0776***	CARE and contributions sections missing from leaver form. Record also has a 'Deferred Details' tab on Altair and all details on Altair have been updated to DOL and there is an outstanding JLT task so this may have been started.	Deferred (Post 14 leaver)	Member has another record, however only a status 8 (awaiting entry), so this case should be processed as deferred.
00030 - Effingham Parish Council	NA3732***	No leaver form (requested by Orbis Nov 19)	Next day aggregation (Post 14 leaver)	
00034 - Surrey Valuation Tribunal	NR7976***	No leaver form and pay after DOL. Record also has a 'Deferred Details' tab on Altair and all details on Altair have been updated to DOL and there is an outstanding JLT task so this may have been started.	Deferred (Post 14 leaver)	
00044 - Hanover Housing Assn	NY7856***	No leaver form. Record also has a 'Deferred Details' tab on Altair and all details on Altair have been updated to DOL and there is an outstanding JLT task so this may have been started.	Deferred (Post 14 leaver)	
0045 - Surrey County Council	JG6117***	No leaver form	Deferred (Post 14 leaver)	Member has another record, however only a status 8 (awaiting entry), so

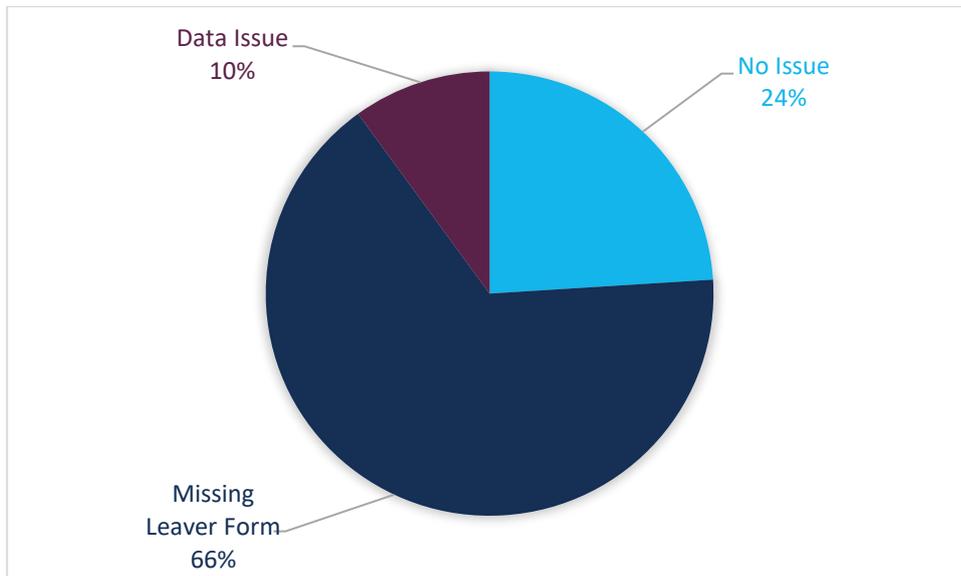
Employer	NI Number	Issues	Leaver Type	Further Comments
				this case should be processed as deferred.
00047 - LGPS - Surrey C C Fire Civ Staff	JL3090***	No leaver form	Deferred (Post 14 leaver)	
00073 - University of Surrey	JA1845***	None	Concurrent (Post 14 leaver)	
00093 - Reigate Grammar School	NR9074***	No leaver form	Deferred (Post 14 leaver)	
00094 - Moor House School and College	NB2573***	No leaver form	Deferred (Post 14 leaver)	
00095 - The Royal Grammar School	WK9313***	No leaver form	Deferred (Post 14 leaver)	
00359 - Elmbridge Borough Council	YT3510***	None	Deferred (Post 14 leaver)	Under two years' service but (per note on record) refund not allowed as member has previous LGPS service.
00361 - Epsom and Ewell B C	SC9292***	No leaver form	Deferred (Post 14 leaver)	
00379 - Guildford Borough Council	WK3092***	None	Death in service	
00380 - Surrey Choices Ltd	JW0260***	None	Deferred (Post 14 leaver)	Member has another record, however only a status 8 (awaiting entry), so this case should be processed as deferred.
00436 - Mole Valley District Council	WK2337***	No leaver form	Deferred (Post 14 leaver)	
00481 - Reigate and Banstead B C	JE9121***	No leaver form, missing address	Deferred (Pre 14 leaver)	
00494 - Runnymede Borough Council	JJ6024***	None	Next day aggregation (Post 14 leaver)	
00501 - Cleves School (Academy)	NM5286***	No leaver form	Deferred (Post 14 leaver)	
00502 - Thomas Knyvett College (Acad)	NW6988***	None – information provided on two documents	Aggregation then deferred (Post 14 leaver)	Member has two undecided leaver records.
00503 - Howard of Effingham Sch (Acad)	JK0860***	No leaver form	Deferred (Pre 14 leaver)	
00504 - Sunbury Manir School (Acad)	NB9019***	No leaver form	Aggregation (Post 14 leaver)	It may be prudent to consider aggregating even without a leaver form if certain key details are consistent and up to date.

Employer	NI Number	Issues	Leaver Type	Further Comments
00505 - Glyn School (Acad)	NS4999***	No leaver form. Record also has a 'Deferred Details' tab on Altair and all details on Altair have been updated to DOL and there is an outstanding JLT task so this may have been started.	Concurrent (Post 14 leaver)	
00506 - Weydon School (Acad)	JN2287***	No leaver form	Deferred (Post 14 leaver)	
00507 - Collingwood College (Acad)	JX0372***	None	Deferred (Post 14 leaver)	While member has another record, its status is 'optant out' so no issue deferring this one.
00508 - George Abbot School (Acad)	SE7535***	No leaver form	Concurrent then deferred (Post 14 leaver)	Could consider aggregating without a leaver form following additional checks.
00509 - South Farnham School (Acad)	NZ4874***	No leaver form	Deferred (Post 14 leaver)	
00510 - The Magna Carta Sch (Acad)	TG1661***	No leaver form	Aggregation (Post 14 leaver)	It may be prudent to consider aggregating even without a leaver form if certain key details are consistent and up to date.
00511 Rodborough School (Acad)	JP7840***	No leaver form	Concurrent (Post 14 leaver)	Could consider aggregating without a leaver form following additional checks.
00512 - Three Rivers Academy	NZ0032***	No leaver form	Aggregation (Post 14 leaver)	It may be prudent to consider aggregating even without a leaver form if certain key details are consistent and up to date.
00513 - Thamesmead Sch {Acad}	WL5701***	PT hours on Altair differ from leaver form	Aggregation (Post 14 leaver)	
00514 - The Raleigh School (Acad)	NE0098***	No leaver form	Deferred (Post 14 leaver)	
00515 - Woolmer Hill Sch (Acad)	NZ6803***	No leaver form	Next day aggregation (Post 14 leaver)	
00516 - Epsom and Ewell High Sch (Acad)	JZ8032***	None	Refund (Post 14 leaver)	
00584 - Waverley Borough Council	NW2625***	Leaver form on record. Record has a 'Deferred Details' tab on Altair and all details on Altair have been updated to DOL and there is an outstanding JLT task so this may have been started. Also has a transfer details tab	Next day aggregation (Post 14 leaver)	

Employer	NI Number	Issues	Leaver Type	Further Comments
		with a date TV received 6 months after the DOL.		
00603 - Woking Borough Council	NS8498***	None	Deferred with refund option (Post 14 leaver)	
00744 - Freedom Leisure (Woking)	JP6511***	No leaver form	Deferred (Pre 14 leaver)	
00896 - Sight for Surrey (pre 2016)	WA1766***	No leaver form	Deferred (Post 14 leaver)	
00917 - N.E.S.C.O.T	NP0948***	No leaver form	Deferred (Post 14 leaver)	Two records which end on the same day so both are treated separately so will be two deferred cases
00918 Brooklands College	NZ0129***	None	Deferred with refund option (Post 14 leaver)	
00929 - Activate - Guildford College	JM0436***	Leaver form on record. Record has a 'Deferred Details' tab on Altair and all details on Altair have been updated to DOL and there is an outstanding JLT task so this may have been started.	Deferred (Post 14 leaver)	Member has another record, however only a status 8 (awaiting entry), so this case should be processed as deferred.
00960 - Leatherhead Trinity School	JK3157***	No leaver form	Aggregation (Post 14 leaver)	It may be prudent to consider aggregating even without a leaver form if certain key details are consistent and up to date.
00966 - Surrey Police (LGPS)	WE3862***	No leaver form (form on record doesn't match DOL)	Deferred (Post 14 leaver)	
00976 - U.C.A. Univ. Creative Arts	WP2619***	No leaver form	Deferred (Post 14 leaver)	
0092A - John Ruskin College (Orbital)	YY3963***	Unlinked active record; undecided leaver record only has the status 2 in status history (i.e. no status 1 for joining), together with no contributions etc.	Concurrent (Pre 14 leaver)	Needs determining whether the status 2 is a valid record or not.
00920 - Esher College (Academy)	NH0257***	No leaver forms	Aggregation then deferred (Post 14 leaver)	Two undecided leaver records
00533 - Farnham Heath End Schl (Acad)	NP0097***	No leaver form	Aggregation (Post 14 leaver)	
00584 - Waverley Borough Council	NM2301***	No leaver forms	Deferred (Post 14 leaver)	Two records which end on same day, so both need to be processed as individual deferreds.

5.2 Results summary

The results of the above sampling is displayed in the chart below:



A high number of records are missing leaver forms. These will need to be chased, though potentially assumption-based approaches could be considered for some. For example, next-day aggregations with CARE and other key data up-to-date could potentially be processed without a leaver form.

With respect to cases with a leaver form, the majority of these had no issue found that would prevent processing. However, a not insignificant minority did have an issue, which means querying with the employer or payroll provider needs to be built-into any plan to process the cases concerned.

6 Processing Cases

6.1 Questions to consider

ITM have worked on a number of LGPS backlog projects and have encountered different processes and methodologies for handling cases. In order to process cases most efficiently, the following questions should be considered before simply heading straight into an attempt to fully clear the backlog:

- ▶ Are leaver forms required for completing every case type? For example, given certain conditions it may be reasonable to allow proceeding with a concurrency without one, e.g. in the situation of an employer that has changed payroll provider and therefore the legacy payroll data is unlikely to be available to query.
- ▶ Can multiple aggregations be ordered in a specific fashion to maximise efficiencies? For example, if the ultimate combined benefits are unaffected, it may be prudent to prioritise combining non-concurrent service ahead of concurrent, rather than processing records in strict date order.
- ▶ Are there any system limitations that need to be taken account of, and if so, have more recent Altair release notes been checked to confirm any old issues requiring manual workarounds have now in principle been resolved?
- ▶ Do complications involving multiple posts ending on the same day have defined processing policies?
- ▶ Do you have a well-defined policy for non-concurrent aggregations where the member left pre-14, but re-joined post-14? For example, it may be prudent to process backlog cases like a post-14 default aggregation where the gap less than five years and certain salary checks showed combining to be very likely in the member's interests.
- ▶ Are end of year WTE pensionable pay figures good enough to allow calculating service adjustments for concurrent aggregations with final salary benefits without going back to the employer or payroll provider? And if so, how exactly should the figure for the ongoing record be derived, e.g. should the salary at the previous, next or nearest renewal date be used?
- ▶ Are term-time positions involving final salary benefits consistently recorded? If not, what sort of checks and adjustments should be done?