

Fire Fighter's Pension Scheme Scheme-specific Data Quality Report ORBIS Surrey Fire and Rescue Authority

October 2020

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1 Executive Summary

1.1 Introduction

In 2015, the Pensions Regulator (TPR) assumed responsibility for Public Sector Pension Schemes. Prior to this, in June 2010, TPR issued guidance on the approach that they consider to be good practice for measuring the presence of member data. Specific targets were set for data TPR deemed as 'common' and Aquila Heywood has assisted customers in the collection and qualification of this data. TPR also outlined 'Scheme-specific' (conditional) data but did not set prescriptive targets as the data is deemed to be scheme-specific. The guidance did target Pension Scheme Trustees to ensure that 'reasonable endeavours' were undertaken to provide evidence of assessment and measurement, together with an action plan to meet the scheme specific targets.

To assist customers in undertaking a practical assessment of their Scheme-specific data, Aquila Heywood offers a Data Quality service.

1.2 Data Quality Service

Working with ORBIS, Aquila Heywood has completed a review of Surrey Fire and Rescue Authority's Scheme-specific pension data in line with the guidance notes set down by TPR detailed in appendix A. Aquila Heywood's understanding of the Firefighter's Pension Scheme data, benefit calculations, interfaces and processes, has assisted in the agreement of which items to test. The tests to satisfy each condition have been run and the results quantified to provide guidance on any corrective action required.

The following terms should be understood to aid understanding of the conditions used and the results obtained:

- Data condition identified TPR condition, for example check that an active member does not have a date of leaving
- Data category grouping of relevant data conditions, for example Member Benefits (see section 1.4 below)
- Data item item of data which forms part of a data condition for example 'date of leaving'

The service incorporates in the order of 100 individual tests against the data conditions agreed with ORBIS. To provide focus on the key areas of Scheme-specific data to be addressed, each data category is measured against an agreed benchmark.



1.3 Benchmark

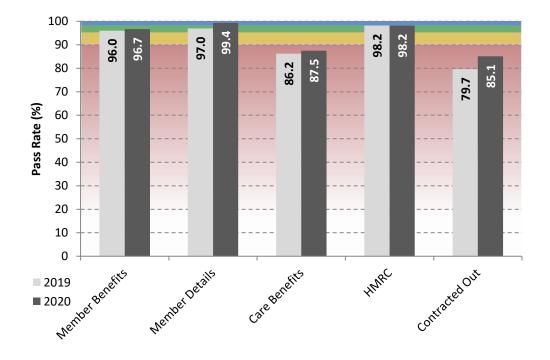
The benchmarks applied to the results presented in this report were agreed between the ORBIS and Aquila Heywood. The categories and thresholds are as follows:

Category	Pass Threshold
Blue	Pass rate >= 98%
Green	95% <= Pass rate < 98%
Amber	90% <= Pass rate < 95%
Red	Pass rate < 90%

These benchmark ranges are illustrated in the background of subsequent results graphs.

1.4 Summary of Scheme-specific Data Results

The graph below indicates the Surrey Fire and Rescue Authority's performance for each data category against the agreed scheme benchmarks. Also, below is an explanation as to the data conditions relevant to each data category. The results presented herein are generated from data extracted from ORBIS's Live Altair service on 7th October 2020 for all tests. The 2019 tests were generated from data extracted on 2nd September 2019. The overall rating for Surrey Fire and Rescue Authority's Scheme-specific data is **95.4%**, a 2.2% increase over the 2019 score of 93.2%.





The 2020 tests were executed across 3,275 member records, an increase of 112 records from the number tested in 2019.

1.4.1 Member Benefits Data

This category includes those data conditions for members that directly relate to the details of benefits in payment or to the calculation of benefits yet to be paid.

A total number of 2,012 members qualified for one or more checks as part of the in-scope conditions under this category, 1 more than in 2019. ORBIS set a minimum 90% benchmark target and achieved a **96.7**% pass rate, placing it in the green benchmark. This pass rate is a **0.7**% improvement on 2019. The detailed analysis of each condition is in Section 2.1, but 7 of the 10 Data Conditions specified attained the highest benchmark category (Blue, >98%). The lowest scoring condition was **Transfer In Details 1**, where only 70.0% of members passed, almost entirely as a result of incorrectly recorded historical manual cases. Although many of the cases that failed this condition may not directly affect benefits being paid to members, these cases should be investigated to ensure service credits are correctly recorded. The other two conditions not to achieve the highest benchmark were **Total original Deferred Benefit** and **Tranches of Dependant Pensions** with scores of **92.8%** and **97.5%** respectively.

As most data in this category represents benefits being paid to members, ORBIS should consider addressing all conditions failed within this category as the highest priority.

1.4.2 Other Member Data

This category includes those data items that may be used in the calculation of member benefits.

A total number of 2,057 members qualified for one or more checks as part of the in-scope conditions under this category, 56 less than in 2019. ORBIS set a minimum 90% benchmark target and achieved a **99.4%** pass rate, corresponding to the highest blue benchmark, which is an increase of 2.4% on 2019. The detailed analysis of each condition is in Section 2.2 but all 6 individual scores attained the highest benchmark category (Blue, >98%). The lowest score was in the **Salary** condition, where **98.0%** of members passed. Most failures were due to missing data. The contributions test condition has been removed this year.

1.4.3 CARE Benefits

This category includes those data items required to calculate Career Average Revalued Earning (CARE) benefits.



A total number of 1,326 members qualified for the checks as part of the in-scope conditions under this category, a decrease of 80 since 2019. ORBIS set a 90% minimum benchmark target and achieved an 87.5% pass rate, placing CARE benefits in the red benchmark. This represents a 1.3% increase on 2019. As CARE revaluation is calculated for each member from a single factor table, the table itself is checked for a complete list of factors and was given a 100% pass. The detailed analysis of the conditions is in Section 2.3. Fails in this category directly affect the calculation of member benefits and so should be resolved as a priority.

1.4.4 HMRC

This category includes those values recorded as a result of the Finance Act 2004 as well as Pre A-Day limits.

A total number of 1,682 members qualified for one or more checks as part of the in-scope conditions under this category, a decrease of 106 members over 2019. The conditions within this category have been expanded for clarity and are detailed in Appendix B.

ORBIS set a 90% minimum benchmark target and achieved a **98.2**% pass rate placing the category in the highest blue benchmark. This is the same score as achieved in 2019. The detailed analysis of each condition is in Section 2.4. The highest benchmark was achieved in 5 of the 7 conditions although BCE8 condition did not result in any members being tested. The **BCE7** category achieved a **0**% percent pass rate although it should be noted that only **6** members qualified for tests in this category. The **BCE6** condition had the next lowest score with a **93.1**% pass rate as a small number of cases did not have a PCLS recorded despite the record showing a lump sum had been paid.

1.4.5 Contracting Out

This category includes those data items required to meet scheme contracting out conditions.

A total number of 2,057 members qualified for one or more checks as part of the in-scope conditions under this category, a decrease of 29 on 2019. ORBIS set a 90% minimum benchmark target and achieved an **85.1%** pass rate, placing Contracting Out in the red benchmark. This pass rate is **5.5%** higher than in 2019. The detailed analysis of each condition is in Section 2.5 but the highest individual score was achieved in the condition **Date Contracted Out**, where **98.8%** of members passed. The remaining 3 conditions were benchmarked as red. Fails in this category are likely to have an impact on GMP Reconciliation and so should be resolved either in advance, or as part of the GMP Reconciliation process.



1.5 TPR Scheme Return

The percentage of member records without a single scheme-specific data failure is **82.2%** and this is the figure that TPR will be requesting on the scheme return. This represents an improvement over the 2019 score of 72.1%.

There is not a clear requirement to split the results by the percentage of the member records within each scheme, but for reference these results are shown below. Please note that as some members have records within more than one scheme, they may be counted more than once in this breakdown and these figures may not be consistent with the overall figure as a result.

1992 Scheme	81.3%
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2006 Scheme 82.9%

2015 Scheme 81.0%

1.6 Other Information

The remainder of this report is split into the following sections:

- Scheme-specific Data Results results of each in-scope condition per category along with the number of members tested, main failures and suggested risks and actions
- Appendices details to qualify failures against each condition, along with a list of TPR's guidance relating to Firefighters' Pension Scheme.

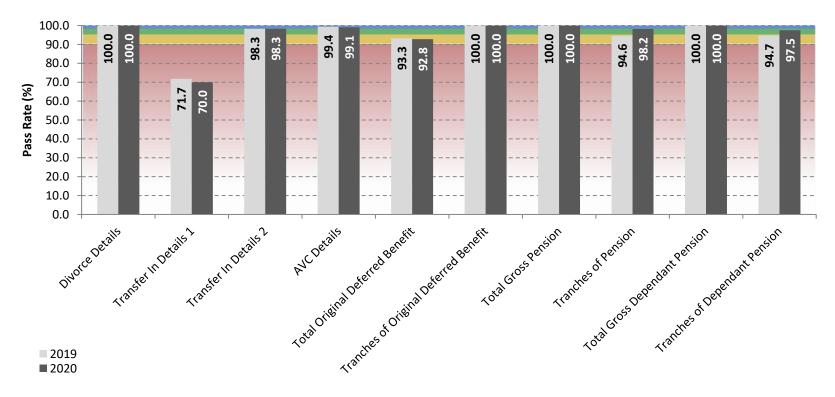
Where possible, Aquila Heywood has provided advice and suggested next actions to work with the ORBIS in implementing a solution to any data anomalies. This document is the start point for ORBIS data management policy and Aquila Heywood will agree with ORBIS the appropriate frequency to repeat these conditions and demonstrate progress in Schemespecific data cleansing.



2 Scheme-specific Data Results

2.1 Member Benefits Data Category

2.1.1 Results





2.1.2 Analysis of Results

	Qua	alifying Mem	bers	Areas for Review		
Condition	Tested (change)	Passed (change)	Pass Rate (change)			Comments
Eligible for Testing: Status 1, 2, 4, 5 & T where Calculation Date (DVC-CALDTE) has a value Transfer In Details 1 Eligible for Testing: Status 1, 2, 4, 5 & A where transfer In details exist	26 (0) 233 (+3)	26 (0) 163 (-2)	100% (0%) 70% (-1.78%)	Fail A: Fail B: Fail C: Fail D: Fail F: Fail A: Fail B: Fail C: Fail D: Fail E: Fail F:	0 0 0 0 0 7 0 1 28 40 7	All members tested passed the tests in this condition for a third consecutive year. The number of members failing a test in this condition increased by 5 to 70 resulting in a 1.78% decrease in the pass rate since 2019. 40 instances concerned invalid transfer types that do not match those calculations write-back. This fault may lead to incorrect reporting but will not affect benefits for these members. There is also 1 failure where there is no service credit or pension credit recorded from the transfer that will require investigation. Providing service was recorded correctly on the service history, member benefits will be correct. There were 28 instances where there is a service credit, but no corresponding service on the service history that should be investigated urgently. There were 7 fails with a missing transfer date and 7 cases had a transfer date that was earlier than date joined scheme. Again, providing service was recorded correctly on the service history, member benefits will be correct.
						Incorrect data may result in incorrect benefit calculations.



	Qua	alifying Mem	bers	Areas for Review		
Condition	Tested (change)	Passed (change)	Pass Rate (change)			Comments
Transfer In Details 2 Eligible for Testing: Status 1, 2, 4, 5 & A where transfer In details exist	233 (+3)	(+3)	98.3% (+0.02%)	Fail A:	4	4 members are missing both the previous scheme name and number, the same as in 2019.
AVC Details Eligible for Testing: Status 1, 2, 4, 5 & A where AVC details or PT Overtime exist	645	639 (-6)	99.1% (-0.31%)	Fail A: Fail B: Fail C: Fail D:	0 0 4 4	The number of members failing a test in this condition increased by 2 to 6 resulting in a 0.31% decrease in the pass rate since 2019. There are 4 contracts across 2 members with an added years contract without a length of service being purchased. A further 4 members have a CPD period end date without a corresponding amount.
Total Original Deferred Benefit Eligible for Testing: Status 4	180 (+16)	167 (+14)	92.8%	Fail A: Fail B: Fail C: Fail D: Fail E: Fail F:	0 0 0 0 0 0	The number of members failing a test in this condition increased by 2 to 13 resulting in a 0.51% decrease in the pass rate since 2019. 13 members had a PI date earlier than date last processed. These cases should be investigated ahead of producing deferred ABS.
Tranches of Original Deferred Benefit Eligible for Testing: Status 4	180 (+16)	180 (+16)	100%	Fail A: Fail B: Fail C: Fail D: Fail E: Fail F:	0 0 0 0 0	All members tested passed the tests in this condition for a third consecutive year.

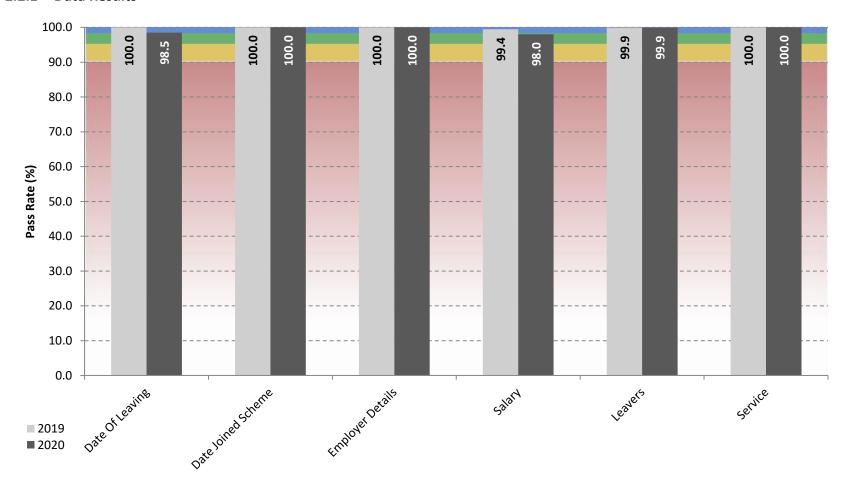


	Qua	alifying Mem	ibers	Areas for Review		
Condition	Tested (change)	Passed (change)	Pass Rate (change)			Comments
Total Gross Pension Eligible for Testing:	768	768	100%	Fail A: Fail B: Fail C: Fail D:	0 0 0 0	All members tested passed the tests in this condition.
Status 5 Tranches of Pension	768	754	98.2%	Fail E: Fail A: Fail B:	0 0 1	The number of members failing a test in this condition decreased by 28 to 14 resulting in a 3.62% increase in the pass rate since 2019.
Eligible for Testing: Status 5	(-3)	(+25)	(+3.62%)	Fail C:	13	1 member either has no CARE tranche or has one of very low value where one was expected. This case should be investigated as a high priority. 13 members do not have the latest pensions increase date.
Total Gross Dependant Pension Eligible for Testing:	160	160	100%	Fail A: Fail B: Fail C: Fail D: Fail E:	0 0 0 0	All members have passed the tests in this condition for a second consecutive year.
Tranches of Dependant Pension Eligible for Testing: Status 6	160	156	97.5% (+2.76%)	Fail A: Fail B:	0 4	The number of members failing a test in this condition decreased by 4 to 4 resulting in a 2.76% increase in the pass rate since 2019. 4 members do not have the latest pensions increase date that was processed.



2.2 Other Member Data Category

2.2.1 Data Results





2.2.2 Analysis of Results

Pension Credit members are excluded from tests in this category.

	Qu	alifying Mer	nbers	Areas for Review		
Condition	Tested (change)	Passed (change)	Pass Rate (change)			Comments
Date of Leaving	2057	2026	98.5%	Fail A: Fail B:	0 0	All members passed the tests in this condition in 2019.
Eligible for Testing: Status 1, 2, 4, 5, 9 & A	(+56)	(+25)	(-1.51%)	Fail C: Fail D:	0 31	There are now 31 members who are currently in active employment but have a date left without a previous status 4 or 9.
Date Joined Scheme	2057 (+56)	2057 (+56)	100%	Fail A: Fail B:	0	All members tested have passed all tests in this condition for the third consecutive year.
Eligible for Testing: Status 1, 2, 4, 5, 9 & A						
Employer Details	2057	2057	100%	Fail A: Fail B:	0 0	All members tested have passed all tests in this condition for the third consecutive year.
Eligible for Testing: Status 1, 2, 4, 5, 9 & A	(+56)	(+56)	(0%)	Fail C: Fail D:	0 0	

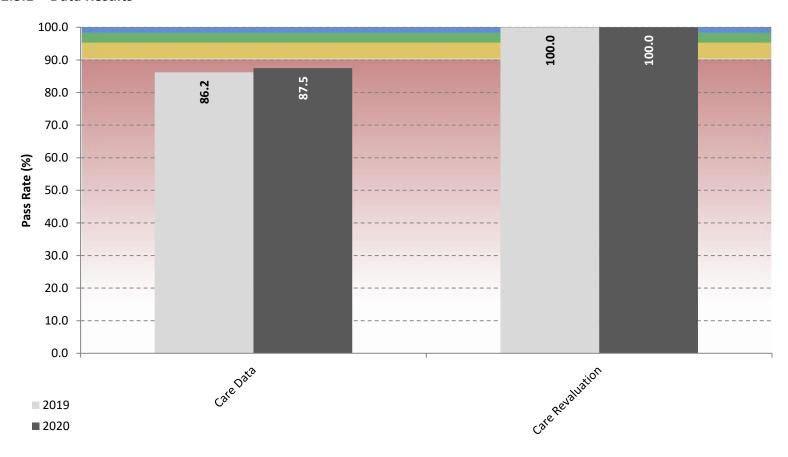


	Qu	alifying Mer	nbers	Areas for Review		Comments
Condition	Tested (change)	Passed (change)	Pass Rate (change)			
Salary (Final Salary members) Eligible for Testing: Status 1, 2, 4, 5, 9 & A	2047 (+49)	(+20)	98%	Fail A: Fail B: Fail C: Fail D: Fail E: Fail F:	12 0 0 0 2 30	The number of members failing a test in this condition increased by 29 to 40 resulting in a 1.4% decrease in the pass rate since 2019. Of the 40 members failing in this condition, a proportion of them failed on more than one test. 30 members had a latest salary recorded that was earlier than the latest bulk update by ORBIS and should be investigated to determine if they are still active members. For members with final salary service without a pay recorded, annual benefit statements cannot be processed and therefore investigation should be made to ensure no members are affected in this way. 12 members had no pay entries at all. 2 pensioners had a blank or small pensionable pay amount on their pension details.
Contributions Eligible for Testing: Status 1, 2, 4, 5, 9 & A	N/A	N/A	N/A			These tests are no longer conducted as they are not used to calculate benefits.
Leavers Eligible for Testing: Status 4, 5, & 9	921 (+13)	920 (+13)	99.9%	Fail A: Fail B: Fail C:	1 0 0	The number of fails in this condition has remained the same since 2019. 1 member has either a blank date of leaving or one prior to 1/1/1900.
Service Eligible for Testing: Status 1, 2, 4, 5, 9 & A	2057 (+56)	2057 (+56)	100%	Fail A:	0	All members tested have passed all tests in this condition for the third consecutive year.



2.3 CARE Benefits

2.3.1 Data Results





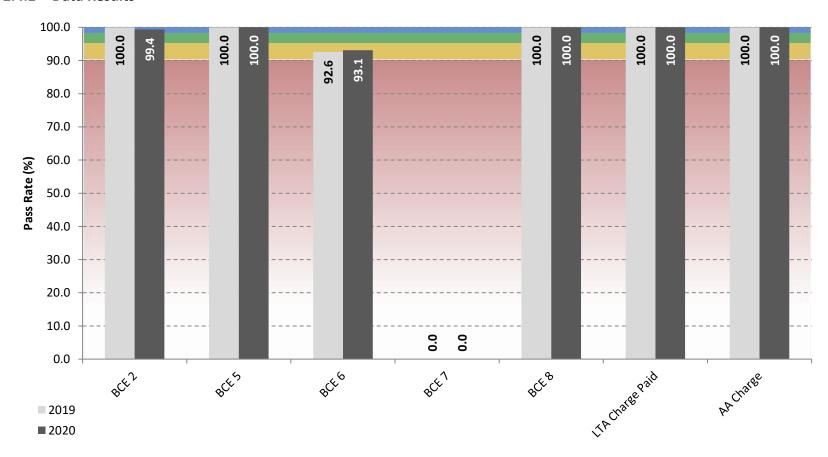
2.3.2 Analysis of Results

	Qu	alifying Mer	nbers	Areas for Review		Comments
Condition	Tested (change)	Passed (change)	Pass Rate (change)			
CARE data Eligible for Testing: Status 1, 2, 4, 5, 9 & A	1326 (+80)	(+86)	87.5% (+1.29%)	Fail A: Fail B: Fail C: Fail D: Fail E:	0 16 19 90 66	The number of members failing a test in this condition decreased by 6 to 166 resulting in a 1.29% increase in the pass rate since 2019. 16 active members either have no CARE start date recorded or an incorrect protection status (i.e. not T, U or O). There are 19 members without CARE data where some is expected. 90 members appear to be missing at least one year-end entry of CARE data. Some members failing this test joined the scheme in March and may not have been received payment in the scheme year of entry and may therefore be genuine exceptions. 66 members have a contribution entry recorded for a year in which there are no CARE benefits recorded. This data is crucial to the calculation of member benefits and the employers with missing data should be reminded of the importance of providing this data as soon as possible.
CARE Revaluation Eligible for Testing: Revaluation Factor Table	1	1	100%			The revaluation table is present and correct



2.4 HMRC

2.4.1 Data Results





2.4.2 Analysis of Results

	Qu	alifying Mer	nbers	Areas for Review		Comments
Condition	Tested (change)	Passed (change)	Pass Rate (change)			
BCE 2 Eligible for Testing: Status 5 where Date Retired > 6/4/2006	333 (+19)	331 (+17)	99.4%	Fail A: Fail B: Fail C:	2 0 0	All members passed the tests in this condition in 2019. There are now 2 members who have an invalid crystallisation date.
BCE 5 Eligible for Testing: Status 4	180 (+16)	180 (+16)	100%	Fail A:	0	All members tested have passed the test in this condition for the third consecutive year.
BCE 6 Eligible for Testing: Status 5 members where Date Retired > 6/4/2006 and Age at Date Retired < 75	333 (+23)	310 (+23)	93.1% (+0.51%)	Fail A: Fail B: Fail C:	2 21 0	The number of members failing a test in this condition has remained the same at 23 since 2019. 2 members have an invalid crystallisation date. 21 members are missing a Pension Commencement Lump Sum value despite having a lump sum on the pension details. The reasons for this should be investigated prior to looking at methods for populating the data.
BCE 7 Eligible for Testing: Status 7 members where Date of Death (from Exit Details) is after 6/4/06 and within 5 years of Date Retired	6 (0)	0 (0)	0% (0%)	Fail A: Fail B:	6 0	All 6 members tested in this condition do not have crystallisation death grant details where some is expected, the same as in 2019.

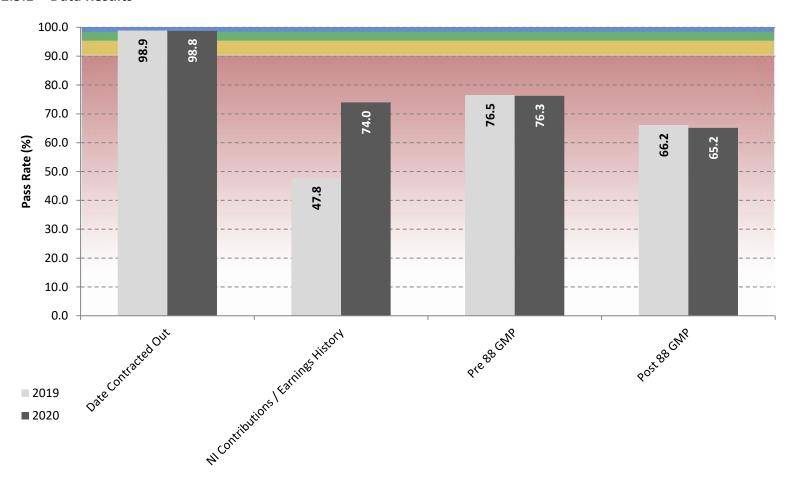


	Passed (change) 0 (0)	Pass Rate (change) 100% (0%)	Fail A: Fail B: Fail C:	or Review 0 0	Comments No members qualified for a test in this condition for the third consecutive year.
			Fail B:		No members qualified for a test in this condition for the third consecutive year.
			Fail D:	0	
219	219	100%	Fail A:	0	All members passed the test in this condition for the third consecutive year.
+4)	(+4)	(0%)			
	611 (+44)	100%	Fail A: Fail B:	0	All members have the latest AA data recorded for the third consecutive year. The tests were checking for the PIP ending on 05/04/2019.
51	1	1 611	1 611 100%	1 611 100% Fail A: Fail B:	1 611 100% Fail A: 0 Fail B: 0



2.5 Contracting Out

2.5.1 Data Results





2.5.2 Analysis of Results

	Qu	alifying Men	nbers	Areas for Review		Comments
Condition	Tested (change)	Passed (change)	Pass Rate (change)			
Date Contracted Out Eligible for Testing: Status 1, 2, 4, 5 & A members	2057 (+29)	2032 (+26)	98.8%	Fail A: Fail B: Fail C:	25 0 0	The number of members failing a test in this condition increased by 3 to 25 resulting in a 0.13% decrease in the pass rate since 2019. 25 members, with pre 06/04/2016 service, are missing a Date Contracted Out (DCO).
NI Contributions / Earnings History Eligible for Testing: Status 1, 2, 4, 5 & A members where NI- Table is not E and date contracted out is on or after 6/4/78 AND before 6/4/1997	(-30)	634 (+210)	74% (+26.18%)	Fail A: Fail B: Fail C: Fail D: Fail E:	1 N/A 0 0 222	The number of members failing a test in this condition decreased by 240 to 223 resulting in a 26.18% increase in the pass rate since 2019. This is primarily due to the removal of NI earnings test (Fail B). 1 member is missing a date left active service 222 members have neither a full NI earnings history nor a GMP recorded (failed both C and D simultaneously). This data is key for correct assessment and payment of benefits.
Pre 88 GMP Eligible for Testing: Status 4 & 5 members where Contract Out SSPA75 is before 6/4/88	611 (-20)	466	76.3%	Fail A: Fail B: Fail C:	145 0 0	The number of members failing a test in this condition decreased by 3 to 145 resulting in a 0.28% increase in the pass rate since 2019. 145 members that have left with pre 1988 service are missing a GMP at exit.



Condition	Qualifying Members							
	Tested (change)	Passed (change)	Pass Rate (change)	Areas for Review	Comments			
Post 88 GMP	660	430	65.2%	Fail A: Fail B:	225 230	The number of members failing a test in this condition increased by 9 to 230 resulting in a 1.0% decrease in the pass rate since 2019.		
Eligible for Testing: Status 4 & 5 members where Contract Out SSPA75 is before 6/4/97 and Date Left is after 6/5/1988	(+7)	(-2)	(-1%)	Fail C:	0	225 members in this category are missing a value for GMP at exit and a Post 88 GMP at exit. A further 5 members are just missing a Post 88 GMP at exit.		



3 Data Correction Plan

The table below provides ORBIS with suggestions for resolving the issues identified in Section 2 and a suggested priority. This table is deliberately high-level as the detail and dates should be agreed once the results have been thoroughly reviewed. The recommendations represent a summary of the recommended actions outlined in more detail in Section 2.

Data Category	Recommendation	Suggested Priority
Member Benefits	Investigate incomplete Transfer In cases as benefits may be incorrect	• High
	Investigate the 8 issues with additional benefits as soon as possible as benefits may be affected	VERY HIGH
	Investigate the 13 discrepancies in deferred pensions	• High
	Investigate the 14 discrepancies in pension figures as a high priority	• High
	Investigate the 4 discrepancies in the dependant benefits	• High
Other Member Data	Investigate the 31 cases with either an unexplained date of leaving present	• Low
Dutu	Investigate the 44 final salary pay issues prior to running annual benefit statements	• High
	Investigate the 1 case where the date for leaving is either blank or incorrect	• High
CARE Data	CARE data should be requested where it has yet to be supplied as soon as possible.	VERY HIGH
	 Investigate all other data issues in this category by status prior to issuing annual benefit statements for that status. The pensioner should be investigated as soon as possible to ensure correct benefits are in payment 	• High



HMRC	Investigate the 2 cases with invalid crystallisation dates	• Medium
	Investigate the 21 cases missing a PCLS	• Medium
	Investigate the 6 cases with missing death grant data	Medium
Contracting Out	Investigate the 25 cases with incorrect Date Contracted Out	• Medium
	 Investigate missing and incorrect data for NI contributions and earnings history 	• Medium
	Review and update GMP values in conjunction with the GMP Reconciliation process	• Medium
	Obtain and upload GMP figures for the members with missing data as a high priority	• High



4 Appendices

4.1 Appendix A – TPR Guidance (In-Scope Tests)

Member Benefits

Condition	Status Tested	TPR Guidance
Pension Sharing Details	Active, Deferred, Pensioner	If a member has had a pension sharing order, check that full details of the benefits transferred to the ex-spouse/ex-civil partner are present.
Transfer In Details	Active, Deferred, Pensioner	If benefits have been transferred in, check that all relevant details are recorded. This will include (as a minimum) the details of the previous scheme, the amount of the transfer value (split between protected rights and non protected rights and, if relevant, split between the amount received in respect of the member and employer contributions and AVCs), benefits secured, (if relevant) contracting out details.
AVC Details	Active, Deferred, Pensioner	Check that there is a history of any AVCs paid, type of investment, current provider, and (if relevant) benefits being secured
Total Original Deferred Benefit	Deferred	Check that total original deferred benefit is present (either derived or explicit).
Tranches of Original Deferred Benefit	Deferred	Check that there is a breakdown of the various tranches of the total deferred benefit. This must identify tranches with different rates of increases either in deferment or in payment, and tranches with different contingent spouse's/civil partner's benefits. Likely to include such items as pre/post 1997 splits, pre/post 2005 splits, Barber splits, VFM underpin etc. Details of the date at that any tranche is payable, if different from the scheme's normal retirement date, will also be required. The sum of the individual components must equal any total deferred pension that is recorded on the system.
Total Gross Pension	Pensioner	Check that a total pension is present (either derived or explicit).



Condition	Status Tested	TPR Guidance
Tranches of Pension	Pensioner	Check that there is a breakdown of the various tranches of the total pension, identifying tranches with different rates of increase and contingent spouse's/civil partner's benefits. The sum of the individual components must equal any total pension that is recorded on the system.

Other Member Data

Condition	Status Tested	TPR Guidance
Date of Leaving	Deferred, Pensioner	For trust-based schemes, check that member has a date of leaving that is after date joined
Date Joined Scheme	Active, Deferred	Check that the date joined scheme is present, later than date of birth, and not earlier than date joined company. False dates should be classed as missing data.
Date joined employing company	Active, Deferred	For members of multi-employer schemes check that date joined employing company is present and is later than date of birth. False dates should be classed as missing data.
Salary	Active, Deferred	Check that there is at least one relevant salary within the last 12 months of membership.
Salary History	Active, Deferred	Check that a relevant salary exists for each of the last 5 renewal periods of membership and is greater than £1.
Contributions	Pensioner	For contributory schemes check that there is a contribution amount present for each year of active membership, or that a contribution total is present.
Date of leaving (date pensionable service ended)/ date last premium/contribution paid	Deferred, Pensioner	For trust-based schemes check that member has a date of leaving which is after date joined scheme, and that member status is not active if date of leaving is present.



CARE Data

Condition	Status Tested	TPR Guidance
Accrued benefit details	Active, Deferred, Pensioner	Check that accrued benefit details are present if they are updated and recorded annually. If benefits are calculated from first principles when member leaves, all relevant salary & contribution will be required instead.
Revaluation percentage	Global Table	Check that there is a history of revaluation percentage for the accrued pension for each relevant year, if benefits have not been not uprated and recorded annually.

HMRC

Condition	Status Tested	TPR Guidance
Benefit Crystallisation Event Details	Active, Deferred, Pensioner	Check that full details of the dates and amounts paid at each benefit crystallisation event, including details of LTA percentage used, are present.
Lifetime Allowance Charge Paid	Pensioner	Check that the date and amount of any lifetime allowance charge paid is present.



Contracting Out

Condition	Status Tested	TPR Guidance
Date Contracted Out	Active, Deferred, Pensioner	Check that this is present and not earlier than 06/04/1978.
N.I. History (Contracted Out earnings & contributions)	Active, Deferred, Pensioner	Check that members have a full contracted-out history during any period contracted out on a GMP basis. A verified GMP, agreed with NISPI, would be an acceptable alternative. Not required for reduced rate females.
Pre 88 GMP	Deferred, Pensioner	Check that a member with at least one month of pre 4/88 contracted out service has a pre 88 GMP. GMP must be divisible by 52. May be derived if total GMP and post 4/88 GMP are recorded.
Post 88 GMP	Deferred, Pensioner	Check that a member with at least one month of post 4/88 service contracted out on a GMP basis has a post 88 GMP. Can be derived or explicit.



4.2 Appendix B – Benefit Crystallisation Events (In-Scope)

Benefit Crystallisation Event	Description
BCE2	Where a member becomes entitled to a scheme pension, whether from a defined benefits arrangement or a money purchase arrangement.
BCE5	Test the level of entitlements not taken by a member at age 75 under a defined benefits arrangement, by measure of the level of benefits that would come into payment at that time, if drawn.
BCE6	 A lifetime allowance test is triggered through BCE6 whenever a member becomes entitled under a registered pension scheme to: A pension commencement lump sum paid before age 75, when uncrystallised benefits are drawn under an arrangement A serious ill health lump sum paid before age 75, where the individual falls into serious ill health A lifetime allowance excess lump sum where a chargeable amount has been identified because the individual's lifetime allowance has been fully used up.
BCE7	Where a relevant lump sum death benefit is paid on the death of the member.
BCE8	Where a member's benefits or rights are transferred to a qualifying recognised overseas pension scheme.



4.3 Appendix C – Conditions and Fail Criteria

Member Benefits

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Divorce Details Eligible for Testing: Status 1, 2, 4, 5 & A where Calculation Date (DVC-CALDTE) has a value	Value is missing in total pension debit (DVC-TOTINI)	Value prior to 01/12/2000 is present in calculation date (DVC-CALDTE)	Value prior to 01/12/2000 is present in Payment Date (DVC-PAYDTE)	CETV (DVC-TVAMT) is blank or 0)	Pension debit (DVC-CONAMT) is blank or 0	Percentage split (DVC-PCSPLT) is blank, 0 or over 100
Tested: 26	Failed: 0	Failed: 0	Failed: 0	Failed: 0	Failed: 0	Failed: 0
Transfer In Details 1 Eligible for Testing: Status 1, 2, 4, 5 & A where transfer In details exist	Date received (ADD-TV-DT) is blank or 0	Transfer Value is blank or 0 (ADD-TV) unless the transfer type (ADD-TYPE) is INTERFND (no payments made for transfers between fire brigades)	Service (ADD-BD-CR) and transferred pension (ADD- RETP) are both blank or 0	If service (ADD-BS-CR) > 0, service history must be present. There must be a service history line that starts (HIST-START) on the same date as previous scheme from ADD-FROM)	Type (ADD-TYPE) is not valid ie CLUB, INTERFND, NON CLUB, PERSONAL, RESTITUTIO or some have INTRAFND	Date TV Received is invalid or < date joined scheme (DJS)
Tested: 233	Failed: 7	Failed: 0	Failed: 1	Failed: 28	Failed: 40	Failed:7
Transfer In Details 2 Eligible for Testing: Status 1, 2, 4, 5 & A where transfer In details exist	Previous scheme name (ADD-PR-SCH) or employer reference (ADD- PR-EMP) must be present					
Tested: 233	Failed: 4					



Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
AVC and additional benefits details Eligible for Testing: Status 1, 2, 4, 5 & A where AVC details or PT Overtime exist	If AVC Details present then start date (AVC-EFF-DT) must be present	If AVC Details present then contract end date (AVC-TE-DUE) must be present and equal to or later than AVC-EFF-DT	If AVC Details present and type (AVC-TYPE) is A, C, D, L, P then added years (AVC-ADDYRS) must be greater than 0	Where CPD period end date (FUND-STDTE) exists, CPD contributions (FUND-NCOMM) and APB value (FUND-COMM) must both be greater than zero		
Tested: 645	Failed: 0	Failed: 0	Failed: 4	Failed: 4		
Total Original Deferred Benefit Eligible for Testing: Status 4	No value in Initial Pension (DEF-TOT-IP)	The value in Initial Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	No value in total current pension (DEF-TOT-CP)	The value in total current Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	PI date (DEF-INC-DT) must be present and later than date joined fund (DJF)	Last PI date (DEF-PI-DT[1]) is earlier than last PI date processed by customer
Tested: 180	Failed: 0	Failed: 0	Failed: 0	Failed: 0	Failed: 0	Failed: 13
Tranches of Original Deferred Benefit Eligible for Testing: Status 4	Member has not got at least one of 'PEN' or 'CARE' tranche (DEF-TYPE) or has one with a value less than or equal to a small figure (default of £1.00) agreed with customer. (including negative values)	Member with post CARE start date (CARE-ST-DT) service has no 'CARE' tranche or has one with a value less than or equal to £1.00				
Tested: 180	Failed: 0	Failed: 0				



Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Total Gross Pension Eligible for Testing: Status 5	No value in Initial Pension (PEN-TOT-IP)	The value in Initial Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	No value in total current pension (PEN-TOT-C)	The value in total current Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	PI date (PEN-INC-DT) must be present and later than DJF	
Tested: 768	Failed: 0	Failed: 0	Failed: 0	Failed: 0	Failed: 0	
Tranches of Pension Eligible for Testing: Status 5	Member has not got at least one of 'PEN' or 'CARE' tranche (PEN-TYPE) or has one with a value less than or equal to a small figure (default of £1.00) agreed with customer. (including negative values)	Member with post 31/03/2015 service has no 'CARE' tranche or has one with a value less than or equal to £1.00	Last PI date (PEN-PI-DT[1]) is earlier than last PI date processed by customer			
Tested: 768	Failed: 0	Failed: 1	Failed: 13			
Total Gross Dependant Pension Eligible for Testing: Status 6	No value in Initial Pension (DEP-TOT-IP)	The value in Initial Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	No value in total current pension (DEP-TOT-C)	The value in total current Pension is between £0.01 and a small figure (default of £1.00) agreed with customer	PI date (DEP-INC-DT) must be present	
Tested: 160	Failed: 0	Failed: 0	Failed: 0	Failed: 0	Failed: 0	



Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Tranches of Dependant Pension Eligible for Testing: Status 6	Member has not got at least one of 'PEN' or 'CARE' tranche (DEF-TYPE) or has one with a value less than or equal to a small figure (default of £1.00) agreed with customer. (including negative values)	Last PI date (DEP-PI-DT) is earlier than last PI date processed by customer				
Tested: 160	Failed: 0	Failed: 4				



Other Member Details

Pension Credit members are excluded from tests in this category.

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Date of Leaving Eligible for Testing: Status 1, 2, 4, 5, 9 & A	A non-Status 1 member has a blank entry or an invalid date in Date Left (DATE-LEFT)	Date Joined Fund (DJF) is either blank or earlier than or equal to 1/1/1900	Date Joined Fund is later than or equal to Date Left if Date Left present	Date left is present for a status 1 member who does not have a previous status of 4 or 9		
Tested: 2057	Failed: 0	Failed: 0	Failed: 0	Failed: 31		
Date Joined Scheme Eligible for Testing: Status 1, 2, 4, 5, 9 & A	Any of Date Joined Scheme (DJS), Date of Birth (DOB) and/or Date commenced current service (DCCPS) Joined Fund are either blank or earlier than or equal to 1/1/1900	Date Joined Scheme (DJS) is earlier or equal to Date of Birth (DOB) plus 15 years				
Tested: 2057	Failed: 0	Failed: 0				
Employer Details Eligible for Testing: Status 1, 2, 4, 5, 9 & A	Location (LOCATION) is blank	Date Joined employer (DT-JOIN-EM) is either blank or earlier than or equal to 1/1/1900	Date Joined employer must be earlier than date of birth (DOB) plus 15 years	Employment type (CLASS) is blank		
Tested: 2057	Failed: 0	Failed: 0	Failed: 0	Failed: 0		



Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Salary (Final Salary members) Eligible for Testing: Status 1, 2, 4, 5, 9 & A	A member with pre-CARE start date (CARE-ST-DT) service has an invalid or blank date in the latest instance of Pensionable remuneration (PEN-REM)	For non-status 1 or 2 members, the latest instance of Pensionable remuneration does not equal the member's DATE-LEFT	The latest instance of Pensionable remuneration contains a valid date (PEN-REM-DT) but there is no corresponding amount	Status 4 member does not have a value in DEF-PN-PAY or a value less than a small figure (default of £1.00) agreed with customer	Status 5 member does not have a value in PEN-AV-PAY or a value less than a small figure (default of £1.00) agreed with customer	For status 1 members the latest pensionable remuneration date must be equal to or later than the customer's last posting date
Tested: 2047	Failed: 12	Failed: 0	Failed: 0	Failed: 0	Failed: 2	Failed: 30
Contributions Eligible for Testing: Status 1, 2, 4, 5, 9 & A	This test has been removed	This test has been removed				
Tested: N/A	Failed: N/A	Failed: N/A				
Leavers Eligible for Testing: Status 4, 5 & 9	Date Left (DATE-LEFT) is either blank or is earlier than or equal to 1/1/1900	Date Joined Scheme (DJS) is either blank or is earlier than or equal to 1/1/1900	Date Left is earlier than Date Joined Scheme			
Tested: 921	Failed: 1	Failed: 0	Failed: 0			
Service Eligible for Testing: Status 1, 2, 4, 5, 9 & A	If DCCPS > DJS, and DJS < CARE start date, service history must be present					
Tested: 2057	Failed: 0					



CARE Benefits

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
CARE data Eligible for Testing: Status 1, 2, 4, 5, 9 & A	If a CARE start date (CARE-ST-DT) is present then the date must be greater than 31/03/2015	Status A member must have a CARE start date present and must have a protection status (PROT-STAT) of T, U or O	If member has post-CARE start date (CARE-ST-DT) service then POLIMAIN must be present if the member joined before the start of the current scheme year	Every 31/03 from later of DJS, 2016 or year after CARE start date to earlier of date-left or current date must be present as an end date on POLIMAIN	If contributions at any 31/03 from later of DJS, 2016 or year after CARE start date to earlier of date-left or current date are > 0, there must be an entry on POLIMAIN for the same date with a pay figure > 0	
Tested: 1326	Failed: 0	Failed: 16	Failed: 19	Failed: 90	Failed: 66	
CARE revaluation Eligible for Testing: Revaluation Factor Table	Every 31/03 from 2016 to date must be present on factor table 000/B/00/684/2014/0101 2012	The rates on the table do not match the record of HM treasury rates				
Tested:1	Failed: 0	Failed: 0				



HMRC

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
BCE 2 Eligible for Testing: Status 5 where Date Retired > 6/4/2006	Crystallisation Date (CRYS- CRSYSD) is not a valid date or is earlier than date left	PLA Value (CRYS-PLA) is blank	PLA% (CRYS-PLAPC) is blank			
Tested: 333	Failed: 2	Failed: 0	Failed: 0			
BCE 5 Eligible for Testing: Status 4	Any member of these deferred statuses where the member is over the age of 75					
Tested: 180	Failed: 0					
BCE 6 Eligible for Testing: Status 5 where Date Retired > 6/4/2006 and Age at Date Retired < 75	Crystallisation Date is not a valid date (CRYS-PPD) or is earlier than date left	PCLS amount (CRYS-PPA) is blank if PEN-TOT-AL is > zero	There is a date in Serious III Health Lump Sum Payment (CRYS-ILLD) but no corresponding amount (CRYS-ILLA) OR There is an amount in Serious III Health Lump Payment but no corresponding date			
Tested: 333	Failed: 2	Failed: 21	Failed: 0			



Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Eligible for Testing: Status 7 where Date of Death (from Exit Details) is after 6/4/06 and within 5 years of Date Retired	Total death grant (CDTC-TOTLS) is blank (To be checked in first run and removed if deemed not relevant.)	There is a value >0 in Total death grant but one or more of the following fields is blank or 0: Crystallised Value at Date of Death (CDTC-CVAL) Crystallised % Value at Date of Death (CDTV-CVALP)				
Tested: 6	Failed: 6	Failed: 0				
BCE 8 Eligible for Testing: Status 3 where Date Left is > 6/4/2006 and there is a value in QROPS Transfer Date	QROPS Transfer Date (CRYS-TFRD) is not a valid date or is earlier than date left	QROPS Transfer Amount (CRYS-TFRA) is blank	Date of Birth (DOB) is not a valid date	Age at QROPS Transfer Date is over 75		
Tested: 0	Failed: 0	Failed: 0	Failed: 0	Failed: 0		



Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Lifetime Allowance Charge paid Eligible for Testing: Status 5 where Date Retired is after 6/4/2006 (ignoring members where Date, Amount & Indicator) are ticked in either Enhanced Protection or Payment of PCLS Reportable Events (Reportable Events 1 & 2 on Crystallisation screen)	Value in Used PLA% (CRYS-TPPC) is greater than 100% and there is no value in any of LTA Charge (CRYS-LTACH), 25% LTA Charge (CRYS-LTA25) or 55% LTA Charge (CRYS- LTA55)					
Tested: 219	Failed: 0					
Annual Allowance Eligible for Testing: Status 1	Latest annual allowance PIP end date is earlier than the latest run by the customer	If a scheme pays indicator is ticked, the scheme pays amount is not present OR a scheme pays amount is present, but the scheme pays indicator is not ticked				
Tested: 611	Failed: 0	Failed: 0				



Contracting Out

Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Date Contracted Out Eligible for Testing: Status 1, 2, 4, 5 & A	Contract-Out SSPA75 is blank and DJF is prior to 6/4/16	Contract-Out SSPA75 is prior to 6/4/78	The date in Contract-Out SSPA75 is later than 5/4/16			
Tested: 2057	Failed: 25	Failed: 0	Failed: 0			
NI Contributions/Earnings History Eligible for Testing: Status 1, 2, 4, 5 & A where NI-Table is not E and date contracted out is on or after 6/4/78 AND before 6/4/1997	A Status 4 member is missing Date Left Active Service or a Status 5 member is missing both Date Left Active Service and Date of Retirement	This test has been removed	There is not a separate entry in Period End Date (NI) for each April 5th between Date Contracted Out and 5/4/97 (or Date Left/Date Ret if earlier for Status 4 & 5 respectively) (non-reportable – see fail E)	GMP is not present on the NI details for status 1 and 2 and on GMP details for status 4, 5 & T (non-reportable – see fail E)	Fail C and Fail D both occurred	
Tested: 857	Failed: 1	Failed: N/A	Failed: 0	Failed: 0	Failed: 222	
Pre 88 GMP Eligible for Testing: Status 4 & 5 where Contract Out SSPA75 is before 6/4/88	There is no value provided for total GMP at exit	Deducting Post 88 GMP at Exit from Total GMP at Exit results in a negative number	The result of deducting Post 88 GMP at Exit from Total GMP at Exit is not divisible by 52.			
Tested: 611	Failed: 145	Failed: 0	Failed: 0			



Condition	Fail A	Fail B	Fail C	Fail D	Fail E	Fail F
Post 88 GMP	There is no value provided for total GMP at exit	There is no value provided for Post 88 GMP at Exit	Post 88 GMP at Exit is not divisible by 52			
Eligible for Testing: Status 4 & 5 where Contract Out SSPA75 is before 6/4/97 and Date Left is after 6/5/1988						
Tested: 660	Failed: 225	Failed: 230	Failed: 0			









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