Data Scoring – decoding its history, significance, challenges and TPR's expectations

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PASA

Data Scoring Guidance

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1   Introduction

The need for pension schemes to hold high-quality data has always been of paramount importance, regardless of the existence of industry guidance and regulations.

The Pensions Regulator (TPR) recognised significant variations in the quality and accuracy of data held across pension schemes. In 2010, TPR set out expectations for all schemes to measure common and 'scheme-specific'[1] data at least annually, and to put in place plans to address issues. TPR provided updated guidance in 2016, clarifying the need for a transparent and honest assessment of the quality, completeness, and accuracy of membership data. From this moment onwards, trustees were obligated to calculate the data scores and report to TPR accordingly. While TPR's guidance has indeed improved matters and contributed to an overall enhancement in data quality, some issues remain.

Many schemes are now compliant with the record-keeping guidance and regularly review their data scores, but this isn't universally true across the industry. Additionally, where schemes do undergo regular data re-testing, the tests often lack the necessary comprehensiveness, and the specifics of scheme design aren't always fully considered.

It's acknowledged inconsistencies currently exist in the approach to data testing and scoring, so scores can be incomparable when, for example, a scheme changes its administrator or when comparing one scheme to another. The pensions industry must therefore adopt consistent testing methodology in order to ensure comparability of data scores and the best outcomes for scheme members.

2   TPR Requirements

A scheme's data must be reviewed at least annually. The common and scheme-specific data scores reported to TPR should represent the percentage of members where complete and accurate data is available. If a member fails any one of the common or key scheme-specific data tests, this counts as a failure overall for the purposes of deriving the final percentage to report to TPR in the Scheme Return. For example, if you test 10 data items for 100 members and one is incomplete/inaccurate for all members, the score is zero (no members have complete/accurate data) not 90.

Separate scores obtained on an annual basis are required for common data and scheme-specific data. This score doesn't indicate the proportion of data items which are complete and accurate across the whole scheme. Members may have more than one data issue, but it should provide a good indication of data quality from a member's perspective.

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[1] Originally named 'conditional data'

In addition to the requirement to review a scheme's data score annually, an improvement plan is also necessary if any issues are identified. The improvement plan should clearly set out the steps being taken to improve the scheme data and provide evidence the plan is being reviewed and updated regularly. PASA has provided a suite of data **Guidance** which includes typical data items a scheme will be required to monitor for data quality purposes.

3   Why data quality matters

It's a fundamental necessity for trustees to hold complete and accurate data to identify scheme members and value their benefits. TPR expects data in respect of all members and beneficiaries, such as details of all contributions received, all benefit payments to and from the scheme, details of transfers of members' benefits and related assets to and from the scheme.

When developing and implementing a data-testing plan, trustees must consider their long-term aims for their scheme, not just its 'business as usual' requirements. High-quality data is crucial not only for ensuring members and beneficiaries receive their correct benefit entitlements on a day-to-day basis while the scheme remains a going concern, but also for cost reduction and management, de-risking and option availability purposes in relation to other exercises such as buy-ins, buyouts, enhanced transfer value and pension increase exchange exercises, and consolidation.

Additionally, complete and accurate data is necessary for trustees to be able to satisfy their legal obligations and manage data security risks. Having a mechanism in place for scoring data enables meaningful comparisons to be made between schemes, and for identifying improvements which will increase the overall value being delivered to members. The **2023 Value for Money Consultation** and its response suggested utilising the date common and scheme-specific data was last assessed, together with the associated scores, as measures for quality of service.

4   Data accuracy

For many schemes, it's neither feasible nor practical to regularly re-run historic benefit calculations for all members in order to test whether the benefits originally calculated were (and remain) accurate. However, there are other approaches to ongoing testing of data accuracy, and being able to demonstrate such processes are in place. PASA recently published **Data Accuracy Guidance** detailing practical steps which can be taken to achieve and maintain data accuracy.

All participating employers should understand and fully engage in providing complete and accurate data in a timely manner and be aware of the consequences to their employees and their own risks of reputational damage of not doing so.

Member engagement is crucial. Websites enabling scheme members to view their data in real-time are useful, enabling individuals to alert administrators if they believe any data held for them is incorrect or out of date - whether that's identification data such as date of birth and address, or service and benefit-related data. Trustees should consider how they can best utilise the upcoming dashboards as a mechanism for improving the transparency, accuracy and recency of member data.

The extended data trustees hold on members' behalf should routinely be included in communications as an effective way to ensure accurate records are maintained. For example, a retirement quote should include information about pensionable service (giving individuals the opportunity to verify the start and end dates of their membership).

Challenges

Although TPR's record-keeping guidance has been in place for over a decade, trustees still face significant challenges in scoring their data and establishing the data they need to hold in the short, medium, and long terms.

If not properly managed, monitored and maintained, data quality and accuracy can decrease over time, for example, because of:

- Corporate mergers and acquisitions
- Unsuccessful or incomplete benefit rectification projects
- Legislative changes
- Original member data pre-dating the digital era (e.g. paper member files/microfiche)

There's an inconsistent approach across the industry in terms of how the presence of data is measured and the scoring methodology used. Some schemes calculate their data scores based on a generic list of tests without consideration being given to their relevance, while others will pay much greater attention to the very specific requirements of the scheme and its benefit provisions. Limitations are often defined by the administration system being used as much as scheme knowledge itself.

One area where there's a particular challenge is in relation to the maintenance of AVC data. Many AVC arrangements are outsourced to insurers and the data passed between insurers and schemes can vary greatly. Trustees are responsible for the quality of the AVC data associated with their scheme, but often they don't have access to the data required to be able to include it in regular quality reviews and scoring. In light of the requirements for dashboards, PASA is working with AVC providers and recently developed **a toolkit** to support in scope schemes to have better engagement with AVC providers.

5   Testing the data

It's vital data scores are a consistent, honest and true reflection of the quality of a scheme's data. They must not be artificially high because of deficiencies in the scope, sophistication and volume of the tests which can be run.

For the purposes of targeting areas of data which require remedial action, analysis could be further broken down into sub-categories, e.g. members with failures amongst the salary, contribution, deferred and pensioner benefit data. This will aid the planning of data cleanse activities and highlight areas of risk.

Where trustees and administrators don't have access to comprehensive data testing, expert assistance can and should be sought from specialist firms with this technology.

Common Data

TPR has prescribed published common data tests, and these are the **minimum** which should be analysed across the membership. Trustees should consider widening the testing to include other types of data which could reasonably be considered as 'common data', and undertake validation checks to ensure the data is accurate and up to date.

As a minimum requirement, trustees should test at least annually all common data items for completeness for all current members. Good practice is to test the common data held for reasonableness, e.g. is the NI Number in the correct format, is the postcode valid, is the date of birth sensible relative to the date of joining the scheme? Additional analysis which could be undertaken includes maximising the use of technology, such as regular mortality screening, automated online address verification and biometric ID checks. When determining the data to be tested, trustees should consider theirs and the sponsoring employer's long-term objectives, and regularly review the testing methodology.

6   Scheme-specific Data

Beyond common data, trustees will also be monitoring scheme-specific data quality for multiple reasons. Unlike common data, the data being monitored can vary greatly from one scheme to another based on structure and design.

The appendix contains a list of the principal data items trustees and administrators can use as a guide when determining the appropriate tests for their schemes. The list isn't (nor can be) prescriptive or all-encompassing, but it should be sufficiently comprehensive to aid the configuration of data tests and the subsequent development of cleanse plans.

A key principle of this Guidance is schemes and their administrators shouldn't remove data items or data sets from the data scoring analysis due to data issues being known. The data scoring should be for the complete

population and data set, and should reflect the true data position of the scheme. All data required to identify members, calculate and administer benefits must be included in the analysis.

TPR expects trustees to understand their data scoring and be satisfied it's an accurate analysis of the data quality of the scheme.

6.1   Minimum requirements

TPR expects trustees of all schemes to pay attention to areas such as salary records, member options exercised and payment of benefits. This covers all scheme designs such as DB and DC, etc. and applies equally to trust and contract-based schemes.

This allows schemes to gain a member-centric view of their data, but only covers the data required to administer the scheme on a business-as-usual basis. This is the minimum requirement for TPR compliance and won't necessarily provide schemes with the insight to understand the position of their data in relation to other activities, such as de-risking projects.

6.2   Additional practices trustees could be doing

Reasonability and accuracy checks can be run on the data, to ensure consistency and reliability. These checks can be run simultaneously with those testing for the presence of data, and/or run in real-time as and when new data is added, or existing data amended.

Besides regular administration tasks, schemes often have additional project work. Some of these projects, currently treated as ad-hoc, may eventually become routine, e.g., assessing data readiness for dashboards. Data required for these projects needs to be clearly identified and, if not already part of a scheme's TPR data quality assessment, should be assessed periodically throughout a project and be incorporated into continuous data management.

For many projects, the member-centric view provided by the TPR scoring system is still very much relevant, as the ultimate outcome of most projects is some form of communication with members. Whether a member has one data issue or many, they may not be covered by the project until all data issues have been resolved.

There are advantages in taking multiple views in relation to data scoring, such as member segmentation (e.g. membership status) and data types (e.g. service dates or pension elements). Having multiple scores for the same set of data helps make the task of data cleansing more manageable and gives greater opportunity for efficiency gains when creating a data improvement plan.

6.3 What should administrators be doing

Complete data analysis

Administrators should review their data scoring analysis and provide assurance to trustees complete data analysis has been undertaken. Data scoring should clearly state what has been analysed and how the analysis tests have been performed. Where data hasn't been included, this should be clearly highlighted to trustees, with an explanation as to why it was appropriate to exclude from the analysis.

Data criticality

In addition to multiple data scores, the scoring can become more sophisticated by applying criticality ratings to different data items. This would give more weight to data which can only be provided directly by members or where a default or assumption can't be applied during data cleanse. E.g. it's not possible to apply a default or assumption if a member's legal gender is unknown and therefore the data would need to be provided by a source external to the core administration platform, such as a member's back file or directly from the member.

Data scoring comparison

Administrators should use the data they hold to understand how schemes compare to others of similar size and complexity. Data scoring should be consistent and comparable for schemes and where the analysis being undertaken doesn't allow this, improvements to analysis processes should be implemented. PASA and TPR expects a data score for a scheme to be reflective of the data and not dependent on which administration firm has undertaken the analysis.

6.4 What trustees should be doing

Future proofing

Pre-empting future projects and including data items which have previously been excluded is a way to enhance data scoring. Trustees should challenge their administrators about whether the data scoring analysis is reflective of current and future data requirements.

Example 1

A DB scheme might not have a project planned requiring recalculation of service to calculate benefits at crystallisation date, but it's reasonable to imagine there might be such a project in the future. In this context, readiness is essential to prepare the scheme's data for any eventuality.

Example 2

A DC scheme might not have a current requirement to track contribution rate changes for a member, but it's possible this could change in the future. Anticipation and preparedness is key.

Example 3

New or amended legislation could mean pensioners being able to view their benefits via dashboards. The 2024 Finance Bill is a very good example of significant changes being introduced at short notice. The pensions industry needs to be sufficiently agile to swiftly adapt to these changes and ensure all necessary member data is identified and held, and any new disclosure requirements can be adhered to.

Accessibility

Consideration should be given to how member data is currently accessed and how it may be accessed in the future. Consistent data scoring should be easily repeatable, and this can only be achieved if the data is:

- ✔ digitally accessible
- ✔ stored in one location
- ✔ recorded consistently for all members

Trustees should understand how their data is stored and where improvements to data storage should be undertaken.

Trustee review

Trustees should work with their administrators to understand the data scoring for their scheme and be satisfied it's an accurate reflection of the data quality. Trustees should seek confirmation on the data items included in the scoring, and the analysis tests which have been performed. If groups of members or data items haven't been included in the data scoring, the trustees should challenge the approach taken and to ensure the data scoring meets the requirements.

Where data scoring is low, trustees should take action to improve data quality, documented in a data improvement plan and the data management plan. The actions taken should be sufficient to see a material improvement in the data score for the scheme within a reasonable time period.

Where data scoring is very high, trustees should ensure the analysis is an accurate reflection of the data quality held.

Trustees should document in their data management plan, how their data scoring has been undertaken, with information in respect of the data items and tests undertaken.

Data scores should be reviewed and monitored as part of a scheme's governance plans, with changes to scores tracked and understood, and monitoring plan in place to improve and maintain data scores.

7. Conclusion

The importance of regular testing and scoring of data can't be underestimated. It should be high on the list of trustees' priorities. As an absolute minimum, member data should be tested in its entirety at least annually, and the tests should be specifically relevant to the scheme, without exclusion of data items or groups of members. Providers should tailor their data reports to the data issues specific to the needs of each individual scheme. Testing and scoring unnecessary data is misleading, causes attention to be diverted away from genuine data issues which need to be resolved, and can give an exaggerated representation as to the quality of the data held.

Regular data testing and member engagement are crucial for trustees to monitor and evidence improvements in data quality. Even though low data scores are not ideal, it's important to have a true reflection of the quality of the data held. More importantly, trustees need to be able to demonstrate an understanding of the quality of the data they hold and they have put in place rectification plans where needed. Delaying data testing until rectification projects are complete might seem logical, but it's not recommended as it can lead to a lack of transparency and accountability.

The effective application of data scoring can allow trustees to gain meaningful insights into their data quality and support the following scheme objectives:

- Efficiency - can help to identify minor issues before they become major
- Automated data updates - data can be automatically updated by other parties (e.g. employers and members) within controlled parameters
- Consistency - regardless of the type of pension scheme, consistent data scoring provides a continual clear vision of the scheme's data quality
- Member experience - retain focus on the member experience and ensure members have complete and accurate data to enable them to make decisions and receive accurate benefits

8   Appendix

The following tables reflect key scheme-specific data items and the areas of scheme-specific data trustees should consider testing, to the extent they're important to their scheme's benefit structure and design. Although no less important, common data items aren't listed as these are well-publicised and should be tested in all circumstances.

Essential data for all members

Data item	Comments
Scheme category indicator	Schemes often have multiple membership categories, offering a variety of benefit provisions which can differ subtly or significantly. Is an indicator held for each member to denote the category in which they reside? If members can swap between categories, does the relevant date need to be held, and if so, is it?
Date of joining employment	Requirements will vary by scheme, but some benefit calculations may use the date the member joined the company. It can also be useful to validate date of joining the scheme, for example where a waiting period a requirement of the rules.
Normal Pension Age (NPA)	This term is defined in statute, and it should be possible to identify the appropriate date (for each member) from the data held, and without ambiguity. This is the date upon which a member has an unfettered right to claim their benefits, and it may also determine the point before or after which early or late retirement factors apply. Where a Barber window applies, some members may have multiple NPAs.
Protected Pension Ages	Under transitional protection regulations, do any members have a right to a retire before age 55? If so, a flag should exist on their membership record to note this. Similarly, if the protection has been lost, (e.g. because of a breach of the employment conditions) this information should also be recorded in order to avoid an Unauthorised Payment.
Protected Lump Sums	Do any scheme members retain a right to a tax-free lump sum which is greater than 25% (e.g. one of the transitional protections introduced on 6 April 2006)? If so, there should be an indicator on these members records to flag this entitlement exists. Similarly, if the entitlement is lost (e.g. because they have taken a partial transfer-out), this should also be recorded in order to avoid an Unauthorised Payment.
Lifetime Allowance (LTA) protections	Commonly, information about LTA protection is only obtained at the point at which a member's benefits are about to be put into payment, although it may be inherited from a previous administrator, or be automatically offered-up by the member once they've registered with HMRC. Once it has been identified, a member is registered with HMRC for a form of LTA protection, the database must hold as a minimum the type of protection(s) held (e.g. Fixed Protection 2014), and for any of the individual protections, the member-specific protected LTA figure. Since it's possible for a member to lose one of the 'vulnerable protections' (e.g. Enhanced Protection), the database should record the date when this event happened, if known. This is subject to legislative requirements.
Money Purchase Annual Allowance (MPAA)	Trustees are required by law to inform members as and when the MPAA starts to apply to them, e.g. the point at which benefits are first taken under a flexible-access arrangement. The database should record the relevant date, regardless of whether it was taking the benefits from the trustees' scheme which caused the MPAA to be triggered, or it was triggered at an earlier point in time (in respect of benefits flexibly accessed via another arrangement).

Data item	Comments
Data held in 'free-format' comments and other notes-type screens	While information held in this way is undoubtedly useful, it's not a robust repository of key knowledge, and it's an unreliable way of recording data. Any data which can only be obtained from comments screens, should be transferred across to dedicated data-fields.
Pension Sharing Orders and Earmarking Orders	Full data should be held to record in detail the benefits which have been paid out in respect of the ex-spouse (or prospectively to be shared with the ex-spouse), including the date of payment and name of the receiving arrangement. It should be clear and unambiguous from the data the amount of member's benefits which remain.
Scheme Pays (excludes Dependant pensioners)	Members may have asked the trustees to pay an Annual Allowance tax charge to HMRC on their behalf, in exchange for a reduction in scheme benefits. The reduction can be dealt with in several ways, but principally it should be possible to identify from the data whether the tax charge was deducted from a member's DC funds (e.g. AVCs) or their defined benefit arrangement (or a combination). As a minimum, the data should include: • the date the member made the election to use Scheme Pays • whether it was a Mandatory or Voluntary election (or a combination) • the resultant reduction in member benefits (and whether the contingent dependants' benefits were affected) • the tax charge paid and the tax year to which it related • the date the tax charge was paid to HMRC.
Special terms	Any member-specific special terms (e.g. accelerated accrual, non-standard death benefits).
Contracting-Out	If a scheme is Contracted-Out and has GMP or received transfers-in with GMP, Contracted-Out data will be essential to ensure this element is included in future calculation work. Data items include: • Contracted-Out start and end dates • Deferred revaluation basis (S148, Fixed or Limited) • Pre-88 GMP/Post-88 GMP/Total-GMP at date of leaving and GMP Age • Transferred-in GMP and associated data • Contracted-Out contributions and Earnings
Additional Voluntary Contributions (AVCs)	Where a scheme has an AVC policy on a DC basis, it will need to separate out the AVC benefit from the scheme benefit. For pensioner members, details on the guarantee period, single or joint-life terms and escalation rate will need to be held.

Essential data for any in-service members

Data item	Comments
Salary details	The salaries needed to determine members' accrued benefits will vary by scheme, but the requirements should be understood and any gaps in data should be addressed. The longer missing data is ignored, the less chance there will be of being able to obtain it. This includes defined benefit and CARE sections of the scheme.
Employee contributions	To the extent the scheme rules allow for employee contributions to be included in, for example, lump sum death benefits and/or transfer value calculations, a complete and accurate history of payments should be held. As with missing salary details, the longer gaps in data go unaddressed, the harder it becomes to fill them.
Transfer-in data, in respect of benefits members have transferred into the trustees' scheme which secured them, e.g. additional pensionable service and/or a minimum pension underpin	This incorporates funds members have transferred into the trustees' scheme, either from a personal arrangement, or as part of a bulk or block transfer. Upon receiving transferred funds, the additional benefits secured in the trustees' scheme will need to be held in full to ensure these benefits are accounted for when the member's pensionable service ends. To the extent minimum pension underpins apply post-leaving, the revaluation and comparator bases should be understood and the data necessary to undertake the calculations must be comprehensive. As a minimum, the date of receipt of the funds must be held, together with the amount received (including the amount which relates to Contracted-Out service), the additional pensionable service secured and (where relevant) underpin pension. The date upon which the transferred-in benefits become payable should also be recorded (or easily discernible), given it's common for a members benefit tranching to be determined by the date upon which the benefits are due to be paid without reduction.
Special benefit promises	The data should allow easy identification of members with special benefit promises (e.g. derived from an 'exchange of letters', employer-funded augmentations and other one-off events.
Unfunded benefits	It should be possible from the data to identify members with 'unfunded' benefits, and for the distinction between benefits payable from the unfunded arrangement and the Registered Pension Scheme to be clear and unambiguous.
Annual Allowance data	Sufficient data should be held to be able to assess whether a member's Pension Input Amount has exceeded *£60,000 in a tax year, thereby triggering the automatic requirement to send them a Pension Savings Statement. Relevant data would normally comprise accrual rates, salary data and transferred-in benefits, as set out elsewhere in this Guidance. *This is the relevant figure for the 2024/25 tax year, and disclosure requirements have been different in the past and may change in future.
Investment choices, including lifestyle options	Any member choices relating to investments, including the application of a default option, should be tracked with associated dates.
Investment details	Details of the dates on which contributions are received and invested, together with the contribution type (employee, employer, AVC) are essential to ensure transparency for members.

Essential data for Deferred members

Data item	Comments
Total pension at date of leaving	This should equal the sum of the individual benefit tranches, in respect of benefits accrued throughout a member's period of pensionable service (and any benefits secured by a transfer-in).
Deferred pension tranches	Members' benefits should be tranched in full, to make it possible to discern the increases to apply before and after retirement, and the date(s) upon which each element is due to be put into payment. These elements should always equal the total pension at date of leaving. For example, benefits accrued in the 'Barber period' might be payable from a different retirement date from benefits accrued either side of that period).
Contingent spouse and dependants' pension	This is usually (but not always) a proportion of the member's pension. The total figure should be held as at the date the member left pensionable service, together with all necessary tranching. Check AVCs to ensure single-life and joint-life benefits are separated.
Member contributions	If the scheme rules provide contingency for a refund of member contributions to be paid as a death benefit lump sum, it's important a complete record of contributions paid is held, together with any contributions included within a transfer-in.
Final pensionable salary	From a 'business-as-usual' perspective, final pensionable salary data might be required in order to reconstruct a member's benefits, for example if a member or other beneficiary queries the entitlement.
Annual Allowance details	Annual Allowance information (e.g. history of Pension Input Amounts, split between DB and DC savings) in order to satisfy the statutory disclosure requirements.
Part-time service and non-pensionable absence	Periods of part-time service need to be identifiable e.g. start and end dates, contracted hours per week and full-time equivalent hours. It should also be clear as to whether the salary details held are actual earnings or full-time equivalents. Similarly, periods of non-pensionable absence should be recorded (start and end dates), to ensure members' overall periods of pensionable service can be correctly determined.
Investment choices, including lifestyle options	Any member choices relating to investments, including the application of a default option, should be tracked with associated dates.
Investment details	Details of the dates on which contributions are received and invested, together with the contribution type (employee, employer, AVC) are essential to ensure transparency for members.

Essential data for Pensioners and Dependants

Data item	Comments
Total pension at date of retirement	This should equal the sum of the individual benefit tranches which were put into payment, in respect of benefits accrued throughout a member's period of pensionable service (and any benefits secured by a transfer-in). The figure should allow for any early and late retirement adjustments.
Pension tranches	Members' pensions should be tranched in full, to make it possible to discern the increases to apply after retirement, and the date(s) upon which the increases apply (e.g. GMP increases may be added on a different date from those applied to non-GMP benefits). These on an ongoing bases should equal the total pension being paid.
Contingent spouse and dependants' pension (at date of retirement)	This is usually (but not always) a proportion of the member's retirement pension, either before or after the exchange of pension for lump sum. The total figure should be held as at the member's date retirement, together with all necessary tranching.
Contingent spouse and dependants' pension (ongoing post-retirement)	Holding the 'current' amount of each contingent spouse's pension is good practice because it makes the processing of death cases faster and more efficient. It can also reduce the likelihood of a spouse's pension being incorrectly calculated (on a case-by-case basis), e.g. by ensuring consistency across the membership and minimising the need to go a long way back in time to obtain the necessary source figures.
Lump sum taken at retirement	If a member has exchanged any scheme pension for a lump sum, and/or received an as of right lump sum, this data should be recorded (together with the date(s) paid).
Pension exchanged for lump sum	If a member has exchanged any scheme pension for a lump sum, the amount of pension 'given up' should be held, and it should be split between the tranches of the member's pension, as determined by trustee policy.
Temporary pensions (including children's pensions)	Whether or not a temporary pension is due to commence in future or payment starts from date of retirement, the relevant start and end dates should be held in all cases. For children's pensions, if ongoing payment is conditional on age and/or education status, it must be possible to identify the relevant review dates from the data which is held on their record.
Ill-health retirements	If ongoing payment (or level of payment) is dependent on the medical condition of the member age and/or their age, it must be possible to identify the relevant review dates from the data which is held on their record.
Insured pensions	In some instances, trustees may have secured annuities for members with one or more insurers. It might be the insurer(s) pay the annuity directly to the members, or they could be paid to the scheme in order it can be added to the scheme pension paid to the member each month, or there could be a combination. The scheme's data should include an indicator which identifies members for whom trustees have secured an annuity(ies), and ideally, the amounts should also be held (for monthly payroll reconciliation purposes).

Data item	Comments
Pre-06 April 2024 Benefit Crystallisation Event (BCE) data	BCEs should be recorded in respect of every crystallisation event which occurs, both at and after a member's date of retirement. Common mistakes include: • BCEs calculated with reference to the wrong LTA (e.g. ignoring a member's LTA protection) • BCE dates simply being recorded as the member's date of retirement, rather than the true 'date of entitlement' (broadly, the later of date of retirement and the date the trustees have received all information needed from the member in order to put the benefits into payment) • BCE3s being recorded as BCE2s • BCE5s not being calculated and recorded when a member has uncrystallised benefits at age 75 Schemes should review their BCE data, to ensure its complete, accurate and up to date. The LTA was removed from legislation with effect from 06 April 2024, but HMRC confirmed schemes are still required to calculate, store and share with members details about their BCEs.
Post-05 April 2024 Relevant Benefit Crystallisation Event (RBCE) data	For the new lump sum allowance, RBCEs occur when a member becomes entitled to a pension commencement lump sum (PCLS) or an uncrystallised funds pension lump sum (UFPLS). For tax and disclosure purposes, full details should be held in respect of the lump sum(s) paid, the types(s) of lump sum(s) paid and the crystallisation date(s).

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