# Backlog Healthcheck Report for the Westminster City Council Pension Fund

ITM February 2020





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## 1 Executive summary

#### 1.1 Overview

This report summarises the results of a data analysis and audit of unprocessed leavers undertaken by ITM for Westminster City Council Pension Fund ("the Fund").

The objectives of the review are as follows:

- Analyse the complexity of the Fund's undecided leaver ('status 2') backlog.
- Identify backlog and other cases requiring action amongst the frozen refund and active population; in respect of actives, the focus is particularly on identifying potential leavers, i.e. records that should be status 2s; in respect of frozen refunds, outstanding auto-aggregations, cases with a payment deadline upcoming, and so forth.
- Assess general data quality amongst the frozen refund, active 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:

- 87% of undecided leavers, 49% of frozen refunds and 27% of actives have some sort of data issue or complication. The overall number of undecided leavers (1,201) is also quite high as a proportion of the total number of active records (3,911).
- Conversely, the number of potential leavers amongst the active population identified was low (25). This suggests that the status 2 total does accurately reflect the primary leaver backlog.
- An implicit backlog in the frozen refund population of auto-aggregations to complete is small at only 33 cases. In addition, one status 9 is coming up to a deadline to pay out the refund. Beyond this, the primary data quality issue with frozen refunds is having either no address recorded, or one that is marked as 'gone away' (30%).
- End of year issues affect the entire population. 57% of the status 2 population have problems with expected CARE data, 55% with contributions, and 19% with expected WTE pay. Similarly, 14% of the active population have problems with expected CARE data, 9% with contributions and 7% with expected WTE pay.
- For the actives, these issues indicate records affected have not been fully updated following end of year processes; this will require additional work to rectify, obtaining corrected data and potentially recalculating CARE accruals, to ensure annual benefit statements are correct going forward and the records can be processed efficiently when the member leaves.
- For the undecided leavers, the primary issue identified in the sample file reviews performed was a high number of missing leaver forms. This problem affects school employees in particular, and for older and newer cases alike. In addition, data analysis showed that 23% of undecided leavers need to be processed as aggregations, i.e. clearing the status 2 backlog will involve a high proportion of relatively time-consuming cases.



#### 1.3 Key recommendations

- In order to make headway faster on the undecided leaver backlog, records without notable issue or complication should be focussed on first, in particular single record deferred benefits.
- If this is not already administrative practice, subject to checks, consideration should be given to treating undecided leavers with less than two years' service who have nevertheless subsequently rejoined as *de facto* frozen refunds, and therefore, subject to auto-aggregation without being given the option of a refund or transfer out first.
- A small data cleanse project in respect of active records should be considered where CARE and/or WTE pay issues exist and are material for both accurate annual benefit statements and efficient leaver processing when the member leaves.
- The notable number of issues amongst actives and frozen refunds also 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. The Fund may want to consider a carrying out a tracing exercise for this issue.



## 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 Fund'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, this provided a rounded picture of data issues that would be encountered in tackling the leaver backlog.



#### 2.3 Population breakdown

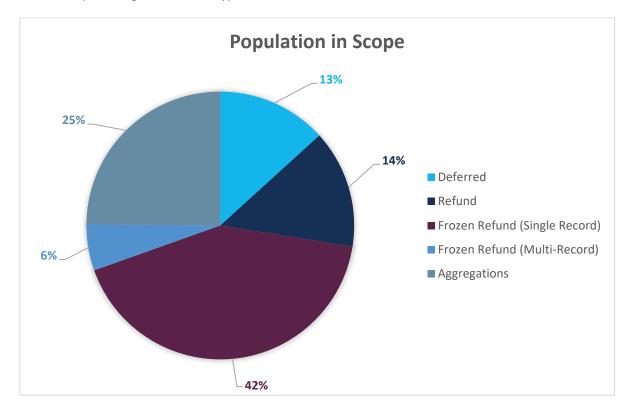
Across the entire Fund, 1,201 member records have a current status of undecided leaver (Altair status 2) and a further 1,092 of frozen refund (Altair status 9). This population breaks down as follows:

Liability Records for NI Number	Undecided Leavers (Refunds)	Undecided Leavers (Deferreds)	Undecided Leavers (Aggregations) <sup>(1)</sup>	Total Undecided Leavers	Total Frozen Refunds	Total Cases in Scope
Single	327	304	-	631	964	1,595
Multiple	-	-	570 <sup>(2)</sup>	570	128	698
				1,201	1,092	2,293

(1) Aggregations include concurrent and non-concurrent records

(2) May include deferred and refund 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

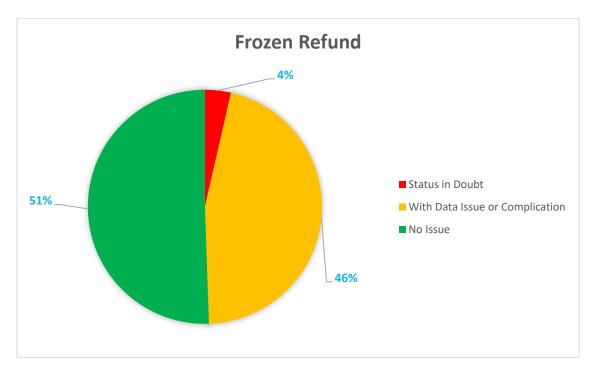
#### 3.1 Introduction

The frozen refund population was analysed for the following purposes:

- Identify implicit backlog cases, i.e. where the member has subsequently re-joined (or left under a concurrent employment), and auto-aggregation under the applicable scheme regulations applies.
- 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	325
Latest address not marked as overseas and postcode is missing, suspect or incomplete	
<b>Commentary:</b> Consideration should be given to identifying all such cases across and following up with a tracing exerci	
DOB missing or inconsistent	0
Date joined scheme inconsistent	2
Date joined employer inconsistent	2
Employer name missing or inconsistent	0
Forenames and initials missing or inconsistent	2
Sex missing or inconsistent with title	10
Surname missing	0
<b>Commentary:</b> Basic details are generally well recorded across the population. The exceptions however should be cleansed.	
NINo is missing, temporary or invalid 31	
<b>Commentary:</b> NI numbers should be correct for future identification purposes, whether to eventually pay out the refur or ensuring new records become linked were the member to re-join.	

## 3.4 Scheme-specific data quality issues

Issue	Total Cases
CARE accrual missing	47
<b>Commentary:</b> 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	1
<b>Commentary:</b> Completed employee contribution details would ordinarily be expected on a processed leaver record.	
Refund amount due not calculated 6	
<b>Commentary:</b> A missing refund due amount implies that the frozen refund has not been processed correctly - what exactly has been 'frozen'? However, the number shown here is likely a legacy of the change of administrator, e.g. there wasn't this figure on the previous system available to migrate to Altair.	
Service history inconsistencies 1	



Issue		Total Cases
<b>Commentary:</b> Any cases where a member's service history does not materially accord with their investigated to confirm which is correct, and where necessary, recalculate the froz		-
Incomplete or inconsistent transfer-in data		5
The majority of these cases are interfunds recorded as being received after the member left. In principle this should not happen, however it can arise when a previous, even shorter period of service with anoth fund either is not discovered immediately, or only gets processed after the member has left again, which will always be possible when the service periods are by definition so short that even combined, they are under the vesting period.		
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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.

#### 3.5 Status issues

Issue	Total Cases
CARE accrual outside of scheme dates	3
Service history outside of scheme dates	2
WTE pay posting outside of scheme dates	26
<b>Commentary:</b> On further investigation, these issues may prove to be because figures have been posted to the wrong record. However, as things stand, they put the integrity of the frozen refund calculation and any leaver documentation sent to the member in doubt.	
Left after NRD, therefore processing as a short service refund would be an unauthorised payment under the Finance Act 2004	
<b>Commentary:</b> Assuming the dates are correctly recorded, these cases will need special handling when the Fund seeks to extinguish the liability.	
Deferred refund past due to be paid	0
<b>Commentary:</b> There are no cases where the member either is over 75, or left under the CARE scheme over 5 years ago, and as such, should have had their refund paid under the 2014 scheme regulations.	

Issue		Total Cases
Member note puts a question mark on	the frozen refund status	3
<b>Commentary:</b> A handful of cases where the wording of a free format memo suggests the frozen refund calculation not have been properly run, or there is another scheme membership that puts doubt on it being run.		
Service length is beyond the applicable vesting period 3   Transfer-in not from another LGPS fund recorded 1   Commentary: Cases found under these headings, if recorded information is correct, should have been processed as a preserved benefit not frozen refund on leaving.   Please note in order to calculate this, service lengths have been tested against 5 years, 2 years, and 3		3
		1
		rocessed as a
		ears. an

Please note in order to calculate this, service lengths have been tested against 5 years, 2 years, and 3 months depending on the vesting period of the time.

## 3.6 Implicit backlog cases

Issue	Total Cases
Aggregation	33
<b>Commentary:</b> 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 is upcoming	1
<b>Commentary:</b> Either where the member is approaching 75, or was a CARE scheme leaver nearly 5 years a will need to have their refund paid in accordance with the 2014 scheme regulations.	ago, and as such,

## 4 Undecided Leaver Analysis

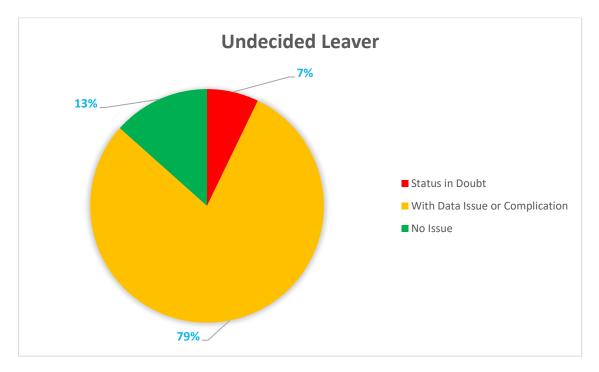
#### 4.1 Introduction

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 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



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 and complications found is provided on the following pages.



### 4.3 Common data quality issues

Issue	Total Cases	
Address missing or marked gone away	230	
Latest address not marked as overseas and postcode is missing, suspect or incomplete	3	
<b>Commentary:</b> If the correct address is not confirmed on the leaver form, these issues should be confirmed with the employer when processing the form.		
DOB missing or inconsistent	0	
Date joined scheme inconsistent	8	
Date joined employer inconsistent	25	
Employer details missing or inconsistent	0	
Forenames and initials missing or inconsistent	0	
Sex missing or inconsistent with title	5	
Surname missing	0	
<b>Commentary:</b> 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	7	
<b>Commentary:</b> 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 inconsistent	683
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 missing663	
Service history inconsistencies	
<b>Commentary:</b> These discrepancies between the Service and Status Histories on Altair should be investigated and querie with the employer as applicable.	
Incomplete or inconsistent transfer-in record	16



Issue	Total Cases
<b>Commentary:</b> Similar to the frozen refund cases above, the majority of these are where the recorded tra postdates the status 2. For an unprocessed leaver this is more unusual, so should be invest	
Unlinked records	36
<b>Commentary:</b> 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 ad it is a prerequisite for calculations that work across multiple membership records to function.	
WTE figures inconsistent with each other 234   Commentary: 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.   Note that while the majority of records affected involve final salary service directly, the figure above includes some CARE-only records that are potential aggregation destinations, given other records held.	

#### 4.5 Status issues

Issue	Total Cases
CARE accrual outside of scheme dates	66
Service history outside of scheme dates	13
WTE pay posting outside of scheme dates	25

#### Commentary:

The existence of postings and service changes that postdate the ostensive leaving date suggests the member did not in fact leave, or at least, data is confused where the member has multiple records.

### 4.6 Other complications

Issue	Total Cases				
Aggregation	279				
<b>Commentary:</b> These records are ones that are due an aggregation option caused either by the member re-joining afterwards, or concurrent service. Please refer to the 'Aggregation' tab on the analysis results breakdown spreadsheet for the specific scenario for each case according to the LGPC schema (e.g. A2, C2 etc.).					
Unprocessed leaver with three-way option of refund, TV out or preserved benefit on leaving	62				
<b>Commentary:</b> 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 years' service in total. As such, the member has the three-way choice of a refund, transfer out or preserved benefits under the 2014 Transitional Regulations. While a minority have since re-joined, technically the option should have been given when they left.					
Variable employment status either explicitly or implicitly recorded	170				
<b>Commentary:</b> Nearly half the figure quoted (82 out of 170) have been detected as likely variable cases not explicitly recorded as such in 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					

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).

## 5 Active Population Analysis

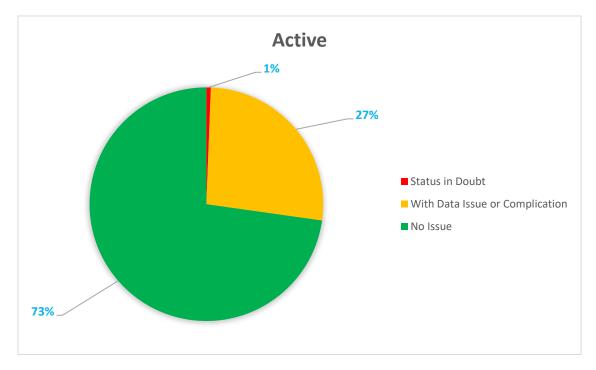
#### 5.1 Introduction

The active population was analysed with the following purposes:

- Identify implicit backlog cases, i.e. where the member has, in fact, left the scheme, but has remained active on Altair.
- Across the population, assess general data quality with respect to common and scheme-specific data items material to leaver processing when the member leaves pensionable employment. While not a comprehensive data audit, this will give some indication of whether (e.g.) employer payroll issues that contributed to the existing status 2 backlog arising are still extant.

#### 5.2 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 and complications found is provided on the following pages.



## 5.3 Common data quality issues

Issue	Total Cases			
Address missing or marked gone away	43			
Latest address not marked as overseas and postcode is missing, suspect or incomplete	1			
DOB missing or inconsistent	0			
Date joined scheme inconsistent	0			
Date joined employer inconsistent	0			
Employer details missing or inconsistent	0			
Forenames and initials missing or inconsistent	2			
Sex missing or inconsistent with title	17			
Surname missing	0			
NINo is missing, temporary or invalid	7			
<b>Commentary:</b> Basic details are mostly well recorded across the population. Any issues identified should, however, be queried with the employer to determine whether the member has left, or to obtain the latest details.				

## 5.4 Scheme-specific data quality issues

Issue	Total Cases				
CARE accrual missing or inconsistent	564				
<b>Commentary:</b> These cases should be further investigated to confirm the reason for the discrepancy and employer as applicable.	queried with the				
Contributions for one or more recent scheme years missing	335				
<b>Commentary:</b> Employee contribution details for each scheme year would ordinarily be expected on an a lack of fully recorded year end contribution figures will need queried with the employer. Thigh figure shown here may be a legacy of school payroll issues in particular.					
Service history inconsistencies	8				
<b>Commentary:</b> These discrepancies between the Service and Status Histories on Altair should be investigated and queried with the employer as applicable.					
Incomplete or inconsistent transfer-in record	36				
<b>Commentary:</b> These cases are primarily where the transfer-in date is not recorded. While it may appear in files scanned to the record, it is an expected data item in the LGA's guidance for scheme-specific data scoring.					
Unlinked records	26				



Issue	Total Cases
<b>Commentary:</b> In principle, any one person should have only one identity on the administration system for ordinary scheme memberships. This avoids the potential for inconsistencies in common da it is a prerequisite for calculations that work across multiple membership records to function	ata. In additior
WTE figures inconsistent with each other	257
<b>Commentary:</b> The appearance of consistent WTE EOY pay figures for each scheme year would ordinarily an active record with final salary service. Any discrepancies should be queried with the em	•

### 5.5 Status issues

Issue	Total Cases			
Data issues that suggest an active member has in fact left	25			
<b>Commentary:</b> These are records where the pay figures predate the latest EOY, or are without WTE or CARE pay figures entirely. The appearance of up to date pay figures would ordinarily be expected and discrepancies should be queried with the employer.				
In addition, checks were performed for active status members with an unexpected pensio or linked dependant record, in order to identify active statuses that were simply incorrect. found.				

### 5.6 Other complications

Issue	Total Cases
Variable employment status either explicitly or implicitly recorded	107
<b>Commentary:</b> In the main, variable status is explicitly recorded in the Altair data for actives, however in a minority of cases (26) there is enough ambiguity to suggest a member is really a casual ever explicitly shown as such on Basic Details, similar to the case with undecided leavers.	en if not

Not explicitly recording a variable status will potentially contribute to wider data issues and more time spent at end of year to clarify details with the employer/payroll.

## 6 Individual Record Reviews

#### 6.1 Unprocessed leaver sampling breakdown

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

Employer	NINO	Supn Ref	Issues	Leaver Type	Further Comments
00W01: Westminster City Council	PW2103***	1815229	No leaver form	Deferred (pre 14 leaver)	
00W01: Westminster City Council	JH1695***	974964	No leaver form	Deferred with refund option (post 14 leaver)	Contributions, WTE pay and CARE pay missing for year of leaving however, this information would be expected on the leaver form.
00W01: Westminster City Council	JE6260***	1024787- 9941	No leaver form	Refund (post 14 leaver)	Contributions, WTE pay and CARE pay missing for year of leaving however, this information would be expected on the leaver form.
00W01: Westminster City Council	SE1221***	-	No leaver form	Deferred (pre 14 leaver)	
00W01: Westminster City Council	JN9508***	1001575- 3490	No leaver form	Deferred (post 14 leaver)	
00W01: Westminster City Council	WM8806***	1000681- 0836	No issues	Deferred (post 14 leaver)	Deferred to be processed once concurrent has been completed.
00W01: Westminster City Council	WM8806***	1000681- 0961	No leaver form	Concurrent (post 14 leaver)	Could consider aggregating without a leaver form following additional checks.
00W01: Westminster City Council	WK4149***	1000513- 3683	No leaver form	Concurrent (post 14 leaver)	Could consider aggregating without a leaver form following additional checks.
00W01: Westminster City Council	NY5182***	1030089- 4307	No leaver form	Refund (post 14 leaver)	



Employer	NINO	Supn Ref	Issues	Leaver Type	Further Comments
00W01: Westminster City Council	SK4366***	1002815- 356X	No leaver form	Aggregation (post 14 leaver)	Contributions, WTE pay and CARE pay missing.
00W01: Westminster City Council	WE4805***	1001912- 1006	No leaver form	Refund (pre 14 leaver)	
00W01: Westminster City Council	JJ1944***	1001936- 3207	No leaver form	Deferred (post 14 leaver)	2 records ended on the same date so both should be processed as a deferred, however a leaver form is required for both.
00W01: Westminster City Council	JJ1944***	1001936- 3274	No leaver form	Deferred (post 14 leaver)	2 records ended on the same date so both should be processed as a deferred, however a leaver form is required for both.
00W01: Westminster City Council	NR9870***	3001952	No leaver form	Aggregation (pre 14 leaver)	
00W21: Citywest Homes Ltd	PX1916***	35000099 9	No issues	Refund (post 14 leaver)	Relevant information held on documents received.
00W21: Citywest Homes Ltd	SL3192***	909SL319 2301	No leaver form	Aggregation (post 14 leaver)	Aggregation then deferred on 2nd record. Leaver form required for both.
00W02: Westminster C C School (SE)	PB7426***	975476-1	No leaver form	Refund (post 14 leaver)	Missing CARE.
00W57: Pimlico Academy	JC4384***		No leaver form	Deferred (pre 14 leaver)	
00W57: Pimlico Academy	JZ5709***	E158924	No leaver form	Refund (post 14 leaver)	Contributions, WTE pay and CARE pay missing.
00W50: Atwood Academy	SS0170***	206732	No leaver form	Next day aggregation (post 14 leaver)	Contributions, WTE pay and CARE pay missing.
00W54: King Solomon Academy	SS0170***	207472	No leaver form	Deferred (post 14 leaver)	Deferred to be processed once aggregation has been completed. Leaver form required for both.



Employer	NINO	Supn Ref	Issues	Leaver Type	Further Comments
00W58: Harris St Johns Wood Academy	NZ8435***	922NZ843 5251	No leaver form	Deferred with refund option (post 14 leaver)	Contributions, WTE pay and CARE pay missing.
00W56: Paddington Academy	SE9339***	A1	Data issue	Refund (post 14 leaver)	Information held on leaver form which pre dates the member joining the scheme on Altair.

#### 6.2 Results summary

<figure><figure>

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

Amongst the schools especially, a clear pattern emerged of missing leaver forms for newer and older status 2s alike. These will need to be chased, though for the older cases, there may well arise problems of payroll systems and suppliers having changed in the meantime. As such, assumption-based approaches to clear the backlog may need to be considered. For example, next-day aggregations with CARE and other key data up-to-date could potentially be processed without a leaver form.



#### 6.3 Likely leaver sampling breakdown

Employer	NINO	Supn Ref	Issues	Further Comments
00W02:Westminster C C School (SE)	NZ4420***	110273-1	Data issue	Contributions, WTE pay and CARE pay missing.
00W05:Westminster C C School (3BM)	JX2171***	W00298A A	Data issue	WTE pay and CARE pay missing. Scheme contributions held predate the member joining the scheme on Altair.
00W57:Pimlico Academy	JM6881***	D317632	Data issue	Contributions, WTE pay and CARE pay missing.
00W57:Pimlico Academy	JP0818***	D302314	Data issue	Contributions, WTE pay and CARE pay missing.
00W01:Westminster City Council	NH8941***	3445683	Data issue	Contributions, WTE pay and CARE pay missing.
00W01:Westminster City Council	NY4100***	1000838- 0659	Data issue	Contributions, WTE pay and CARE pay missing. Exit data held on documents received.

A common theme amongst the likely leavers is missing EOY data. These will need to be requested from the employers, though for the cases where the member joined some time ago, there may well arise problems of payroll systems and suppliers having changed in the meantime.



## 7 Processing Cases

#### 7.1 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 nonconcurrent 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 were 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?