**EPN 551 Annex A**

**Missing Pension Data**

**Employer responsibilities and guidance**

If member pension data is missing or incomplete on the Scheme Administrator’s (MyCSP’s) system, you will need to undertake a search of your available records to provide the required information.

If the missing records relate to employment with a previous government department, you will need to liaise with the department that was responsible for that member’s record.

**The Scheme Administrator will provide you with details of the data they do hold, and identify the missing information that is required. The Scheme Administrator will issue you with a DR1 form (Annex C), which you should complete and return to them with the results of your investigation.**

**1. Internal checks**

Both current and any previous employers will be expected to search all available records for this data, and to complete and sign the checklist confirming that they have done so. This search should include the following;

* Current HR and Payroll systems
* Historic HR & Payroll systems
* Personnel & Superannuation files (looking for memos, letters of appointment, P60s etc.)
* Available Data extracts
* Microfiche records
* Liaison with previous employers
* Spreadsheets or other records held, particularly those provided by a previous employers.

*This list is not exhaustive and is given as an example and prompt*.

As well as the earnings history, other important information to look for will be grade, promotion dates, part-time service and break in service. These will all impact pension benefits.

**2. Contacting the member**

In cases of missing records, one of the best sources of information could well be the member themselves. As the employer you will need to contact them (unless the Scheme Administrator has already done so) to see what information they can provide.

For example they may have:

* Letters or papers which state a salary figure
* Historic pay slips/P60s
* Details of their grade
* Details of any pensionable allowances
* Whether they were part time during the period
* Whether they were promoted during the period
* Details of any breaks in service etc.
* Details of location and other staff employed at the same time on the same grade

It will be important for anti-fraud reasons to have reasonable evidence for accepting data from a member.

**3. Subject Access Request (SAR) HMRC**

As a last resort, the SAR’s process should be considered. The SAR will require consent from the member and will provide details of employer, Earnings and Tax details.

You will need to contact the member to request their written consent in the form of a SAR mandate, and following the member’s consent, submit a request to HMRC for Data Protection Prints.

The address to send the request to is;

**National Insurance Contributions Office**

**COSR Team, (DG4 HO1 Team 9), BP2102**

**Services to Pensions Industry**

**Benton Park View**

**Newcastle**

**NE98 1ZZ**

**Next steps**

Once you have built as much of the history as possible then it may be that the data you have is complete enough to calculate the benefits.

However, if there are still gaps in the history then you will need to consider how you can best supply that data\*.

Typically, the missing data will involve gaps in earnings history, and these may be reasonably calculated by using the following methods:

* Taking the earnings before or after the gap and use any appropriate pay scales to estimate what the pay point rises for the missing years are likely to have been. It is better to use Civil Service pay scales where possible and of course particularly those which relate to the relevant grade.
* If necessary, you could calculate the average rise in Civil Service pay for each year from the Civil Service pay data in order to make the judgement
* If there are no pay scales available then you could use the Average National Weekly Earnings rises published by National Statistics
* If the only information you have is the last year’s earnings, you could use a combination of the above methods to calculate what the earnings in previous years were likely to have been. (This assumes you know the grade and it should be stressed it is much better if you have more than one year’s earnings as a guide.)
* There is also a spreadsheet available with this EPN on the Civil Service Pensions website that gives you some old pay scales which may be helpful.

\*At this stage you will need to make a judgment over whether you can reasonably and accurately work out any gaps in earnings using the methods described above, or whether it would be better to obtain data from HMRC (see below). For example, it is suggested that if after all searches, you only have the final salary to work with, but need to look back over several years, then it would be better to try and obtain the HMRC data first as this could be a more reliable source.

**Allowances**

It will be necessary to establish if the employee would have attracted any pensionable allowances over the period in question. This may well be linked to the grade, role or location of the employee, so to identify that information would be vital. If your records do not provide any information, then the member could be the best source of documentary evidence (such as letters from former employers), which confirm an entitlement.

**What to do if you need more information**

The Scheme Administrator (MyCSP) has access to HMRC records that confirm contracted out dates of service and employer details. This will help establish the date range of pension eligibility for the member.

**Missing pension records - examples**

Calculation for missing earnings:

If, after gathering all the information that you can, you still have not been able to build a complete history, there are ways you can fill in the gaps.

1. In some cases you will be able to fill in the gaps in earnings from the national pay scales. You need to move through the pay scales going across on 1 April and up on birthday, if on age pay, start date if on main scale.

In the case below we knew the majority of the figures, but not the figures that are underlined. Looking at the pay scale for the grade (in this case it was an AA) we were able, quite accurately, to determine the likely salary increases for the missing years by looking at how the scale point was increasing.

1 April 1985 £4048

1 April 1986 £4291

1 April 1987 £4678

1 April 1988 £4960

1 October 1989 £5724

1 April 1990 £6182

1 June 1990 £6182

1 April 1991 £6652

2. However, in some cases you may not have access to the full pay scale for the grade you are looking at.

What you can then do is to use what pay scales you do have to calculate an average Civil Service pay rise for each year, and then use that to plot the rises in salary. For example, if you calculated the rise between 1985 and 1986 to be around 6% then you would get close to the correct figure.

If you have salary figures prior to and after the gap, as in the above case, it enables you to cross check your figures. For example, you could double check how accurate your answer looks if you then calculated what the 1986 to 1987 rise would look like. The problem with this method is that it does not allow for pay progression (yearly movement up the scale). However, if you have no way of knowing this information, this method will still give you a reasonably accurate figure.

3. If you only have the final year salary figure (10708 for 1991 in this case) and you do not have the pay scale for the grade, you could use the percentage increase method to work backwards. For example, if you worked out an average Civil Service pay rise of 11.5% from 1990 to 1991 then 10708/1.115 it will give you the 1990 figure (9603). You could then do the same for each year.

4. Although we have pay scale data covering administrative grades in a lot of cases, we do not have it all. If you feel there is no way of determining the Civil Service yearly pay rise for a given year then you could use the Average Gross Weekly Earnings figures provided on the Office for National Statistics website.

5. EPN's that refer to historic employee contribution rates are:

[EPN 314](https://www.civilservicepensionscheme.org.uk/employers/employer-pension-notices/epn314/) - 2012/13

[EPN 347](https://www.civilservicepensionscheme.org.uk/employers/employer-pension-notices/epn347/) - 2013/14

[EPN 367](https://www.civilservicepensionscheme.org.uk/employers/employer-pension-notices/epn367/) - 2014/15

[EPN 403](https://www.civilservicepensionscheme.org.uk/employers/employer-pension-notices/epn403/) - 2015/16

The rates and salary bands up until 2018/19 are also set out in the Civil Service pension scheme rules.

**New Fair Deal employers**

For more information on NFD employers, please see Annex E.