

The Impact of GDPR in Pensions Administration

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We're used to acronyms in the pensions industry. A day doesn't go by where we don't drop DB, GMP, SIP and SOC into passing conversation. In 2016, GDPR was a new one to us, often mispronounced as GDRP, whilst we got our tongues around the unfamiliar lettering. Today, there's not a pensions professional in the country who doesn't know about the new regulations, what they stand for and what they mean to us and our clients. Not just another acronym, those 4 simple letters stand for so much more.

There was no phase in, no softly, softly approach. Complete compliance with the new regulations was required by 25 May 2018. No excuses! We waded through the requirements, ensuring we had mapped out where and who held the data, that our policies were updated, communications were compliant and that there was a clear plan for the post May 2018 world. We also provided initial guidance to our trustee clients.

The new regulations brought data retention into the spotlight. Can we hold this data? How long for? Who makes the decisions on what is necessary and what is not for the purpose of processing? 20 years ago, a list of contracted out earnings may have been tucked away at the back of a file, long forgotten. I'm sure it may have appeared 'unnecessary' at the time however in a world where we're reconciling and equalising our

GMPs, the data is very necessary. Acting on behalf of the Trustees, administrators have an overarching responsibility to 'communicate the right benefits to the right people at the right time', without sufficient data, how can we do this?

'What would we do if a member asked us to erase all of their data?' Questions were asked, answers were found and after the initial scaremongering we came to realise that the impact of GDPR was less dramatic than we first thought.

May 25 2018 came and went, hundreds and thousands of privacy statements flew out the door and we braced ourselves for an onslaught of subject access requests. And... nothing happened, nothing really changed. GDPR compliance slotted in to our daily processes and became part of the norm.



Now, 16 months on and GDPR compliance is still at the very forefront of our minds, and on our meeting agendas! Trustees and their advisers cannot however afford to be complacent as privacy notices must be kept up to date with key changes, data protection fees need to be paid, data processing records must be maintained and data breach logs must be reviewed regularly to identify patterns and take remedial action.

As data retains centre stage, I believe we all have a new respect for it and understand the importance to ensure it is used appropriately, protected from misuse and is up to date so ultimately we can 'continue to communicate the right benefits to the right people at the right time'.

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Glossary of Terms - for those not so used to Pensions Acronyms

DB - Defined Benefit

GDPR - General Data Protection Regulation

GMP - Guaranteed Minimum Pension

SIP - Statement of Investment Principles

SOC - Schedule of Contributions

COEs - Contracted out Earnings