

26 April 2007

Registration Review
General Register Office for England and Wales
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Dear Sir

Disclosure of Death Registration Information (December 2006)

The NAPF is the leading voice of workplace pension provision in the UK. Some 10 million working people are currently in NAPF member schemes while around 5 million pensioners are receiving valuable retirement income from such schemes. NAPF member schemes hold assets of approximately £800bn, accounting for one sixth of the investment in the UK stock market. NAPF welcomes the opportunity to comment on the consultation paper.

Pension schemes and providers use the data service provided by the Registries for many purposes, not just fraud detection and prevention. The service enables schemes whose trustees typically use specialist administration, tracing and screening services to manage their membership data.

Schemes must ensure that all data are accurate. Scheme trustees also have obligations under the Data Protection Act, as well as obligations under their scheme rules to pay benefits to the correct beneficiaries.

The introduction of Pension Protection Fund levies, the general scheme levies, and the preparation of annual summary funding statements heighten the need for schemes to ensure that membership data are as accurate and as up to date as possible. The ability of schemes to continue to have access to data from the Registries is therefore vital.

NAPF urges the Registries, as part of their services, to continue to include data provision for the reasons explained ideally on a cost neutral basis. We would also support the ABI's proposals for specific items of information to be disclosed as well as the format and timing (please see the ABI's response paragraphs 15 – 16).

We will be pleased to discuss any aspect of our letter in more detail. Please accept our apologies for the response falling outside the consultation period because we learned about the consultation only this month.

Yours sincerely

Ken MacIntyre
Policy Adviser – Regulation and Governance