

TPR's administration guidance – what does it mean for your scheme?

February 2026

As TPR increases its focus on administration, we take a look at the new administration guidance and highlight key considerations and actions for trustee boards.

Administration as a regulatory priority



Administration was once viewed as a back office function but it is now recognised by TPR and across the industry as being the “bedrock” of a well run scheme. With this in mind, TPR has had an increasing focus on administration – it has been working with **administrators directly**, and published a **market oversight report** in November 2025, with clear actions for schemes to continue to work on their data quality.

In December 2025, TPR published new **administration guidance**. It sets out practical steps that trustees can take to meet TPR's expectations in the **administration module** of the general code of practice, as well as identifying a wide range of areas that are relevant to good administration.



Good administration is the bedrock of a well-run scheme.

TPR

What does the guidance cover?

The administration guidance brings together existing administration related expectations. It can broadly be grouped into the six areas below.

Trustee responsibilities

Have sufficient knowledge, oversight and controls to ensure that administration risks are being identified and managed appropriately.

Maintenance of administration IT systems

Obtain assurance that IT systems are robust, secure and fit for purpose, including appropriate cyber security measures. TPR acknowledges cyber security developments in technology, including AI, and expects trustees to understand how these are being used and to ensure that governance and control mechanisms are in place.

Key administration activities

Have oversight of core administration processes, eg member communications, member transfers and the handling of contributions.

Record-keeping and data management

Be satisfied that member records are accurate, with suitable data protection and cyber security measures in place, and that data quality is monitored and improved.

Disaster recovery and business continuity planning

Understand how administration services would continue in the event of disruption, and be comfortable that plans are tested and kept under review.

Quality of administration service

Be clear on the expected standard of service and how performance is monitored. Reporting should allow for quality and accuracy to be understood, as well as timeframes.

What does this mean for trustees?

Trustees are ultimately responsible for scheme administration, even if the day-to-day running of the scheme is delegated to an administrator.

Since TPR's general code of practice was published in March 2024, schemes have been working hard to improve their effective system of governance, or ESOG. This work will have provided a solid framework as trustees' attention shifts to administration.

As with the ESOG, any work on administration will need to be scheme specific and should be proportionate to the size, nature, scale and complexity of the scheme. Who carries out day-to-day administration (eg a third party provider or an in-house team) will affect how trustees apply the guidance and where they focus their oversight, just as much as the size and nature of the scheme itself. In practice, trustees will need to work collaboratively with their administrator and others so that the day-to-day operations and the trustee oversight work harmoniously (see Trustee actions below).

Trustee actions

- + **Take stock of what is being done already** – identify existing documents and processes that are relevant to administration. Consider whether what is already in place provides a good framework or starting point.
- + **Engage with the administrator** (and other providers as needed) – understand how they are approaching the guidance and discuss any updates that might be required (eg to contract terms or to reporting).
- + **Communications, data protection and IT security** – schemes may also need to involve those who provide and support these elements of administration.
- + **Identify any gaps** – decide how to address them, make improvements to processes and put in place a governance structure for administration that is appropriate for your scheme.
- + **Administration policy** – ensure your work on administration and relevant policies and processes are all appropriately recorded, whether in a standalone policy or across other documents (see across).
- + **Plan for the future** – aspects of administration, such as the use of IT and the ways in which fraud can be committed, will continue to evolve. Put arrangements in place to monitor developments and update governance relating to the oversight of administration as needed. Include any future actions in work relating to the scheme's ESOG and own risk assessment.

Do you need an administration policy?

The guidance recommends that schemes have an administration policy (also referred to as an administration strategy) in place addressing several areas including:

- ✓ an administration objective
- ✓ roles and responsibilities
- ✓ information and reporting requirements
- ✓ monitoring and reviewing administration performance.

However, the guidance is not prescriptive about what this looks like (or whether this is a policy or a strategy). For most schemes, particularly those that have already carried out work on their ESOG, we expect that much of the suggested content will be covered in existing documents, such as:

- ✓ administration contract
- ✓ risk register
- ✓ data protection policy, cyber security policy and communications plan
- ✓ terms of reference of a sub-committee responsible for overseeing administration, any other delegations or other governance documents that relate to the oversight of administration.

