

Life and Pensions End to End Case Study



Version: **2.4**

Date: **18 01 2019**

Distribution: **Industry**

Document Name: **Life and Pensions End to End Case Study.pdf**

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CHANGE HISTORY

DATE	VERSION	STATUS
25 05 2007	Version 1.0	First Issue.
20 07 2007	Version 1.1	Updated with Claims process to pay out proceeds and add Occupation Codes Standard.
05 02 2008	Version 1.2	Updated to incorporate the Agency Registration Service, update eService Set Up Best Practice Guidelines and update diagram of the end to end process.
15 05 2008	Version 1.3	Updated with the latest Standards release.
15 05 2009	Version 1.4	Updated to include QNB v3.4 Draft Final, Occupation Codes, NB SIPP/IDPR, Options and Pension Transfers.
14 06 2010	Version 1.5	Update Final Version Dates for Contract Enquiry and Quotes/New Business – add Agency Admin, Unipass and Wrap Valuation Standards.
14 03 2011	Version 1.6	Updated to incorporate Standards scheduled for delivery in early 2011.
31 10 2012	Version 1.7	Updated to incorporate Standards delivered since March 2011.
30 09 2013	Version 2.0	Updated to incorporate Standards delivered since October 2012.
06 05 2014	Version 2.1	Updated to incorporate Standards delivered since October 2013.
27 05 2014	Version 2.2	Updated with latest version of Contract Enquiry Multi Account Wrap and Auto Enrolment Standards published May 2014.

DATE	VERSION	STATUS
05 04 2018	Version 2.3	<p>Updated to provide details on a variety of Standards, including,</p> <ul style="list-style-type: none">• Contract Enquiry Transaction History• Legal Framework;• New Business Details Confirmation;• Investment Switch and Redirect Standards <p>Also updated to add information on:</p> <ul style="list-style-type: none">• the Change Request Consolidation Project;• Provisional Standards;• the Criterion Data Classification.
18 01 2019	Version 2.4	<p>Add Bulk Valuations Standard.</p> <p>Remove the current version details of all Standards as this can be accessed from the Standards Catalogue.</p>

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1 INTRODUCTION

1.1 BACKGROUND

Criterion Standards are the de facto industry messaging standard used to implement Straight Through Processing (STP) between UK Adviser systems (e.g. CRM, Point of Sale, Comparison Portal Services, Back Office, Financial Planning Tools) and Platform / Provider systems.

The former Origo Standards are now maintained and developed by Criterion. Criterion will operate independently to take forward and expand the suite of Standards and Governance services that we provide to the financial services industry; whilst Origo will continue to deliver operational services such as Options Transfers and the Origo Integration Hub.

This Case Study illustrates where Criterion Standards and Services are used to enable eCommerce across the end-to-end Business Process between Advisers and Product Providers. It is supported by two diagrams which can be found in the Appendix. The first diagram shows the current use of Criterion Standards and Services through three main end-to-end process areas:

- Sales;
- Set Up;
- Servicing and Settlement.

The second diagram shows the current use of Criterion Standards through the main end-to-end process areas of Auto Enrolment:

- Data Preparation;
- Postponement;
- Assessment;
- Enrolment;
- Contribution Management;
- Administer HR Data.

This document will be updated on a regular basis and made available on the Criterion website.

1.2 ABOUT CRITERION

Criterion is a not-for-profit body dedicated to improving the financial services industry's operating efficiencies, lowering costs for market participants and improving outcomes for consumers.

Collaboration is at the core of what we do. We work with the government, regulators, product providers, platforms, financial advisers, portals and software suppliers, as well as other industry bodies. With them, we find new ways to cut costs, make processes more efficient and achieve outcomes that would be impossible to achieve acting alone.

We're owned by UK financial services groups who help towards ensuring that the essential Open Standards and Governance Services that the Industry needs are provided.

- Criterion works right across UK Protection, Wealth and Retirement sectors;

- Criterion works closely with its key stakeholders from manufacturing and distribution to prioritise, steer and shape our activities;
- Criterion is based in Edinburgh and operates across the whole of the UK;

For further information about Criterion, please visit www.criterion.org.uk, where you can also find links to our Standards Library.

1.3 CRITERION AND OTHER STANDARDS

Other Standards have been responsible for an increase in Straight-Through Processing within the investment management and banking industries over the last decade. The main Standards used in this area are ISO 15022 (Securities), ISO 20022 (Funds), ISO 8583 (Credit/Debit Cards) and FIX (Securities).

Criterion Standards have the following key characteristics:

- Tailored to meet the integration requirements between Adviser and Platforms systems;
- Very data-rich. Bespoke extensions are rarely required;
- Kept up-to-date to reflect recent regulation e.g. the Retail Distribution Review (RDR), Auto Enrolment;
- UK-specific to support the needs of our market (ISO Standards are international with UK Market Practice Groups where UK specific changes need international ratification);
- Highly responsive to change via Criterion's Governance Groups;
- Supportive of all relevant product groups (collective investments, individual and group pensions, bonds, protection and annuities).

In addition to details of the transaction, Criterion Standards also typically capture detailed information about the Investors (individual and corporate), their Adviser (where applicable) and any regulatory information that is required.

This complements the corresponding ISO/FIX Standards that are tailored for the high volume execution of security and fund transactions between Asset Managers and their Distributors.

1.4 STRAIGHT THROUGH PROCESSING (STP)

Criterion Standards are generally a superset of their equivalent ISO / FIX Standards. A combination of Criterion Standards at the start of an investment order process and ISO / FIX at the end can provide a Straight-Through Processing roadmap from Adviser to Product Provider/Platform to Asset Manager.

Criterion Standards initially focussed on the Quotes/New Business area of the Sales and Set Up process, followed by development of Standards for Contract Enquiry within the Servicing and Settlement area. The introduction of the Tracking Standard in 2006 enabled STP from New Business to Contract Enquiry, by providing the Contract Reference within the Tracking Service.

1.5 PROVISIONAL STANDARDS

A process for the development of Provisional Criterion Standards was introduced in Q2 2016. Further details on the Provisional Standards process can be found in the Publication and Change Management Policy here:

<https://www.criterion.org.uk/standardschangemanagement>

2 CASE STUDY

2.1 INTRODUCTION

Criterion Standards and Services support many of the processes and products within the life, pensions and investment industry.

The sections below and the diagrams following indicate where Criterion Standards and Services facilitate eCommerce across the end-to-end business process.

2.2 SALES

2.3.1 MAINTAIN PERSONAL FACT FIND

The Maintain Personal Fact Find Standard has been designed as an FBS (Foundation Business Services) based Standard allowing details of fact find information gathered for an individual by an Adviser for sales purposes to be moved between systems.

Products : All

<https://www.criterion.org.uk/maintainpersonalfactfind>

2.2.2 QUOTES

The Criterion Quotes Standard enables Advisers to obtain quotes direct from Product Providers, Platforms and via the various Adviser Portals in the marketplace. This helps to:

- speed up the recommendation process by downloading and printing fully compliant quotations and their associated key features;
- avoid data errors through pre-population of the quote;
- keep an audit trail of what's happening throughout the process.

Products : Individual Pensions <https://www.criterion.org.uk/quotesindividualpensions>
Group Pensions <https://www.criterion.org.uk/quotesgrouppensions>
Annuities (including Enhanced Annuities) <https://www.criterion.org.uk/quotesannuities>
Protection <https://www.criterion.org.uk/quotesprotection>
Endowments <https://www.criterion.org.uk/quotesendowments>
Bonds <https://www.criterion.org.uk/quotesbonds>

2.2.3 OCCUPATION CODES

This is the UK Industry Standard list of over 1,800 Occupation descriptions and codes ranging from 'Abattoir Inspector' to 'Zoologist'; it is used principally to support the underwriting process with life and pensions applications.

The Occupation Lists are available in CSV and XML formats and are used within a number of Criterion Standards. These are now supported by Criterion.

Products : (Not Product Specific)

<https://www.criterion.org.uk/occupationcodes>

2.3 SET-UP

2.3.1 INTRODUCTION

Within Set-Up, the Standards incorporate parts of the end-to-end process beginning with the New Business Application Submission up to the point where a contract becomes live on a Provider's system.

2.3.2 NEW BUSINESS

The collection of data required for new business proposals and the submission of new business applications is also underpinned by Quotes/New Business. Data used from the quotation may be used to pre-populate the New Business message. Throughout 2011/2012 these Standards were all upgraded to incorporate RDR Requirements and are now RDR compliant.

These Standards support the collection of data required for the submission of New Business Applications.

For example, the New Business message for Collective Investments can capture all of the data necessary to open an account (or identify an existing account) and then setup a new ISA with the selected asset allocation, investment plan and details of the Adviser and their remuneration where applicable.

Criterion Standards are maintained to ensure a high degree of similarity between the Quotations and New Business Standards to ensure that it is simple for data captured at the Quotation stage to be transferred, without rekeying, to the New Business Application.

Products : Individual Pensions <https://www.criterion.org.uk/nbindividualpensions>
Group Pensions <https://www.criterion.org.uk/nbgrouppensions>
Protection <https://www.criterion.org.uk/nbprotection>
Annuities <https://www.criterion.org.uk/nbannuities>
Collective Investments <https://www.criterion.org.uk/nbcollectiveinvestments>
Bonds <https://www.criterion.org.uk/nbbonds>
Endowments <https://www.criterion.org.uk/nbendowments>

2.3.3 MONEY LAUNDERING

Products : All <https://www.criterion.org.uk/moneylaundering>

This Standard is a component of the New Business Standard and confirms that the Adviser has undertaken Money Laundering checks with the client. It is composed of a recommended business process and an Industry standard

Money Laundering Certificate that can be completed and, subject to the appropriate checks, submitted electronically from the Adviser to the Product Provider.

There is also scope to re-use this Standard within the Servicing processes for checks conducted against large one-off payments into existing contracts.

2.3.4 NEW BUSINESS DETAILS CONFIRMATION

This Standard allows the reporting by Product Providers to Advisers and other distributors of the content of New Business submissions at the point they are received by the Provider – as distinct from the details that left the Adviser or distributor perhaps to be routed via the customer, or the details as they stand at the point of the first NB Tracking message.

<https://www.criterion.org.uk/providenewbusinessdetailsconfirmation>

2.3.5 NEW BUSINESS TRACKING

Products: Collective Investments, Bonds, Individual Pensions, Group Pensions, Endowments, Protection, Annuities <https://www.criterion.org.uk/nbtracking>

Advisers have an electronic method of keeping up to date with the progress of New Business Applications based on the Criterion Tracking Standard. The Tracking Standard will inform the Adviser of the Contract Reference enabling onward servicing once the contract is live. Advisers are proactively informed of the changes by the Product Provider whenever there is a status change or there is a change in status of any one of the pieces of additional information associated with the proposal.

Throughout 2011/2012 these Standards were all upgraded to incorporate RDR Requirements and are now RDR compliant.

This Service contains four components:

2.3.5.1 TRACKED ITEM IDENTITY:

This component contains information to allow the Adviser's Back Office System to tie back the original new business application.

2.3.5.2 STATUS AND ADDITIONAL INFORMATION:

This component tells the Adviser what the status of the New Business Submission is, from the point that it is an "Application Registered" with the Product Provider through statuses until it becomes "Policy Live". Statuses incorporated are:

- Application Registered;
- Awaiting Underwriting;
- Being Underwritten;
- Offered Standard;
- Offered Non-Standard;
- NTU (Not Taken Up);
- Declined;

- Postponed;
- Policy Live.

In addition, the Service looks for changes to any piece of additional information that supports the proposal. These are items such as a Doctor's letter being issued by the Product Provider requesting medical information on the client, or a letter requesting evidence of earnings.

2.3.5.3 PROPOSAL:

This component contains information about the applicant, the product type, the premium and benefits contained within the proposal. This may be used to populate information in the Adviser's Customer Relationship Management (CRM) system. It also contains information about items that are holding up the progress of the New Business Submission, such as a request for medical information, or a letter requesting evidence of earnings.

2.3.5.4 COMMISSION AND ADVISER CHARGES:

A Commission and Adviser Charge Diary and Commission Terms information is supplied. Commission Terms helps the Adviser to check that the rates are as agreed with the Provider. The Commission and Adviser Charge diary assists with reconciliation.

2.4 SERVICING AND SETTLEMENT

2.4.1 INTRODUCTION

This section incorporates anything that happens to a contract once it has become a live contract. It includes the provision of information (such as Contract Enquiry), and other processes in this area not yet covered by Criterion Standards such as Change Instructions e.g. a change of address etc.

These generate opportunities for the Adviser to start the process again, researching a recommendation for their client, e.g. performing a further fact find, in the case of a vesting pension, obtaining a quotation for an annuity and then submitting a new application for that annuity.

2.4.2 CONTRACT ENQUIRY

Enquiries can be made and are submitted to Product Providers, either directly or via a Third Party Service Provider. Valuations (fund values, surrender values, paid up valuations) and transaction histories can be provided either in large volumes for multi contracts or on a single contract basis. They can also be used to input to a Client Review, and to provide up to date information for CRM systems for the Adviser. This up to date information held within the CRM system can then be used for pre-population of Quotes messages when an Adviser has undertaken a Client Review. For Bonds, Pensions, Whole of Life and Endowments, Contract Enquiry has a Contract Details and a Contract Reference Component, both of which incorporate a Fund Breakdown.

Contract Details includes information about the Policyholder, whether there are withdrawals or distributions, valuation, fund breakdown.

Contract References provides reference numbers, product information and valuation and fund breakdown information.

Contract Enquiry Contract Details and Contract References Components

Products : Bonds – Single and Multi-Contracts <https://www.criterion.org.uk/cebonds>
 Collective Investments – Single and Multi-Contracts
<https://www.criterion.org.uk/cecollectiveinvestments> (Valuation artefacts)
 Pensions (Incorporates SIPPs and IDPR) – Single and Multi-Contracts
 Single - <https://www.criterion.org.uk/cepensions>
 Multi - <https://www.criterion.org.uk/cepensions>
 Whole of Life - <https://www.criterion.org.uk/cewolprotection>
 Endowment - <https://www.criterion.org.uk/ceendowment>
 Wrap Valuations – Single and Multi-Contracts - <https://www.criterion.org.uk/cewrapvaluation>

2.4.3 BULK VALUATIONS

The Criterion Contract Enquiry Bulk Valuations Standard enables the provision of regular, 'bulk' valuation data feeds from Providers of such data to its consumers for all product types with an investment element. This helps to:

- Provide Advisers with an up to date view of all of their clients' Value and Investment positions;
- Reduce the phone calls to Providers and Platforms to get this information.

<https://www.criterion.org.uk/cebulk>

Products : All Products

2.4.4 MAINTAIN CONTRACT SUMMARY DETAILS

The Maintain Contract Summary Details Foundation Business Service (FBS) Standard specifies the data exchanged between a Product Provider and Adviser when creating, reading or updating summary details for a specified Contract.

<https://www.criterion.org.uk/maintaincontractsummarydetails>

Products : All Products

2.4.5 CONTRACT ENQUIRY TRANSACTION HISTORY

Products : Collective Investments – Single and Multi-Contracts
<https://www.criterion.org.uk/cecollectiveinvestments> (Reconciliation artefacts)
 Bonds - <https://www.criterion.org.uk/cethbonds>
 Pensions - <https://www.criterion.org.uk/cethpension>
 Whole of Life - <https://www.criterion.org.uk/cethwolprotection>
 Endowment - <https://www.criterion.org.uk/cethendowment>
 Wraps - <https://www.criterion.org.uk/providetransactionhistory>

The scope of the Standards includes the passing of Transaction History information for:

- A Single Wrap;
- Multiple Wraps.

2.4.6 SWITCHES AND REDEMPTIONS

To assist the Adviser in servicing a policy, they may wish to make alterations to a contract once it is live by switching or redeeming some funds either in part or in full.

Products : Collective Investments

<https://www.criterion.org.uk/switchesandredemptions>

2.4.7 REMUNERATION STATEMENT (XML)

This Standard supersedes the XML and EDI Commission Transfer messages detailed below. It has been developed to include RDR related Adviser and Consultancy Charges and to cover the existing Commission types of Adviser Remuneration.

It helps:

- reduce the volume of paper statements being issued;
- Advisers reconcile their payments, reducing the time taken to do this;
- ensure accuracy of the information provided.

Products : Protection, Investment and Retirement Products.

<https://www.criterion.org.uk/remunerationstatement>

2.4.8 COMMISSION TRANSFER (EDI AND XML)

The Commission Standard covers a variety of aspects of Adviser remuneration. The time taken to reconcile commission has been reduced as commission information can now be transmitted electronically using the Criterion Standards. (EDIFACT or XML version.)

2.4.8.1 EDI COMMISSION

Products : Protection, Investment and Retirement Products

<https://www.criterion.org.uk/commissionedifact>

(Please note that whilst this Standard is available on the Criterion Standards website, we no longer accept Change Requests for the Standard).

Guidelines for incorporating RDR changes into this Standard are available at the following link:
<https://www.criterion.org.uk/edicommissionrdrguide>

There are Best Practice Guidelines for the use of the EDI Commission Standard at the following link:

<https://www.criterion.org.uk/edibestpracticeguidelines>

2.4.8.2 XML COMMISSION TRANSFER

Products : Protection, Investment and Retirement Products

<https://www.criterion.org.uk/commissiontransferxm>

2.4.9 LEGAL FRAMEWORK

Establishment of trading relationships for eServices is helped by the Criterion Legal Framework. The Legal Framework (LF) is an arrangement between a Product Provider, Intermediary and one or more Third Party Service Provider and deals with security and contractual issues surrounding the electronic transfer of data among them. The Legal Framework saves parties time by not having to negotiate individual contracts and creates certainty and consistency around the eServices. In January 2018, the Legal Framework was extended to support GDPR.

<https://www.criterion.org.uk/lf>

Work in 2014 on B2B2C and Auto Enrolment (AE) identified a need to extend the LF to support the following business models:

- B2B2C scenarios, where an Adviser is not present;
<https://www.criterion.org.uk/lfanp> – Legal Framework Adviser Not Present
- AE scenarios, where third parties such as Employee Benefit Platforms, AE Consultants and potentially other similar organisations may be treated as TPSPs within the LF.

<https://www.criterion.org.uk/lfae> – Legal Framework Auto Enrolment

These versions have also been updated to include support for GDPR.

2.4.10 INVESTMENT SWITCH AND REDIRECT NOTIFICATION

This Standard enables the exchange of Investment Switch and Redirect Notifications between Product Providers and Back Office Systems Suppliers/Trusted Third Parties.

<https://www.criterion.org.uk/ISRN>

2.5 FIT / PRE-POPULATION

Flexible Integration Toolkit (FIT) is the messaging mechanism to manage both Foundation Business Services (FBS) based messaging and Generic Messaging (these are based on the SOA approach for Criterion Standards). FIT is generic to any assembly of data patterns and Pre-Population is the first example.

<https://www.criterion.org.uk/fit>

Pre-Population is a set of data patterns which has been designed for the pre-population and re-population of a business process. Pre-Population allows:

- Client data transfers between systems;
- One-way and two-way data transfer;
- One off data load and regular data exchange.

-
- It supports the initial supply of information from the source system to a receiving system, ("Pre-Population") and the supply of information back from the receiving system to the source system, ("Re-Population"). Pre-Population will support the transfer of information:
 - Between internal Provider / Platform applications;
 - From Provider / Platform application to Adviser Back Office System (BOS) and vice versa;
 - From Provider / Platform application or BOS to other applications e.g. planning / modelling tools and vice versa;
 - From one BOS to another;
 - From one Product Provider to another;
 - Not all Data Patterns sit at the same version.

Data Patterns are available for the following:

- Adviser;
- Bank Accounts;
- Business Contacts;
- Cash Flow;
- Contracts Summary;
- Document Set;
- Employment;
- Generic Data;
- Illustration;
- Investment Strategy;
- Money Laundering Certificate;
- NewBusinessDetailsConfirmations;
- Person Details;
- Personal Fact Find;
- Portfolio Summary;
- Processing State;
- Product Features;
- Product Features Annuity;
- Product Features Bond;
- Product Features Collective Investment;
- Product Features Defined Benefit Pension;

- Product Features Defined Contribution Pension;
- Product Features Endowment;
- Product Features Equity Release;
- Product Features Loan;
- Product Features Mortgage;
- Product Features Private Medical Insurance;
- Product Features Protection;
- Product Features Savings And ISAs;
- Product Features Whole Of Life;
- Property Features;
- Remuneration;
- Response.

The versioning of each FIT Pattern within FIT is documented in <https://www.criterion.org.uk/fitpatternnames>

3 TECHNICAL STANDARDS

3.1 DOCUMENT PUBLISHING/RETRIEVAL

Criterion Standards are provided for the publication of key documents that are generated by the Platform during the end-to-end process. At this stage of the process, the documents are typically branded Key Features documents and personalised Illustrations.

Documentation is also supported within individual Standards such as document_out in Quotes.

Criterion Standards have a generic mechanism called the ReceiveExternalAlert Standard. This is often used in association with the RetrieveDocumentation Standard which allows, for example, a Platform to notify a Trading Partner that some activity has taken place that they may be interested in – for example “documentation is ready to be picked up”. The documents can then be collected using an implementation of RetrieveDocumentation. Reference numbers are used as the basis of the message exchange in this scenario.

3.2 Remote Publishing

<https://www.criterion.org.uk/remotepublishing>

Remote Publishing provides Platforms with a common and standard way to distribute documents to their customers, across all Service Providers and Software Suppliers. In addition, it can be used for publishing documents on their own internal (intranet) and external (extranet) websites.

3.3 Retrieve Documentation

<https://www.criterion.org.uk/retrievedocumentation>

Document Retrieval is an evolution of Remote Publishing, providing a more direct standard that is specifically used to request documentation from a Platform. The Standard provides one operation that will retrieve one or more documents for a known document reference that uniquely identifies the document or set of documents.

The Platform will provide the documentation as either binary format (typically .PDF) or a web link (URL). The choice of format is at the Platforms discretion and is indicated in the response.

3.4 RECEIVE EXTERNAL ALERT

<https://www.criterion.org.uk/receiveexternalalert>

Receive External Alert is a generic service which is used to inform the recipient of a message that some action or process has taken place. As part of the service interface definition there exists an enumeration of actions/processes which can be appended with further choices as and when these are required. Currently the supported choices are "part save", "application completed", "application numbered", "documentation received" and "process completed".

4 AUTO ENROLMENT

Auto Enrolment (AE) was introduced in the Pensions Act 2008 with the aim of tackling the under-provision of individuals saving for retirement and to encourage people to take more responsibility for their own retirement provision. To comply with AE, all Employers with one or more eligible employees must make available a Qualifying Workplace Pension Scheme (QWPS) to which every eligible employee is automatically enrolled.

A suite of Automatic Enrolment Data Messaging Standards was developed in collaboration with product providers, scheme administrators, HR payroll providers, automatic enrolment solution providers and other interested stakeholders, in both XML and CSV data formats.

Summary information on the Automatic Enrolment Standards can be found in the Automatic Enrolment End to End Case Study Document which can be found here:

<https://www.criterion.org.uk/aeendtoendcasestudy>

5 OTHER CRITERION SERVICES

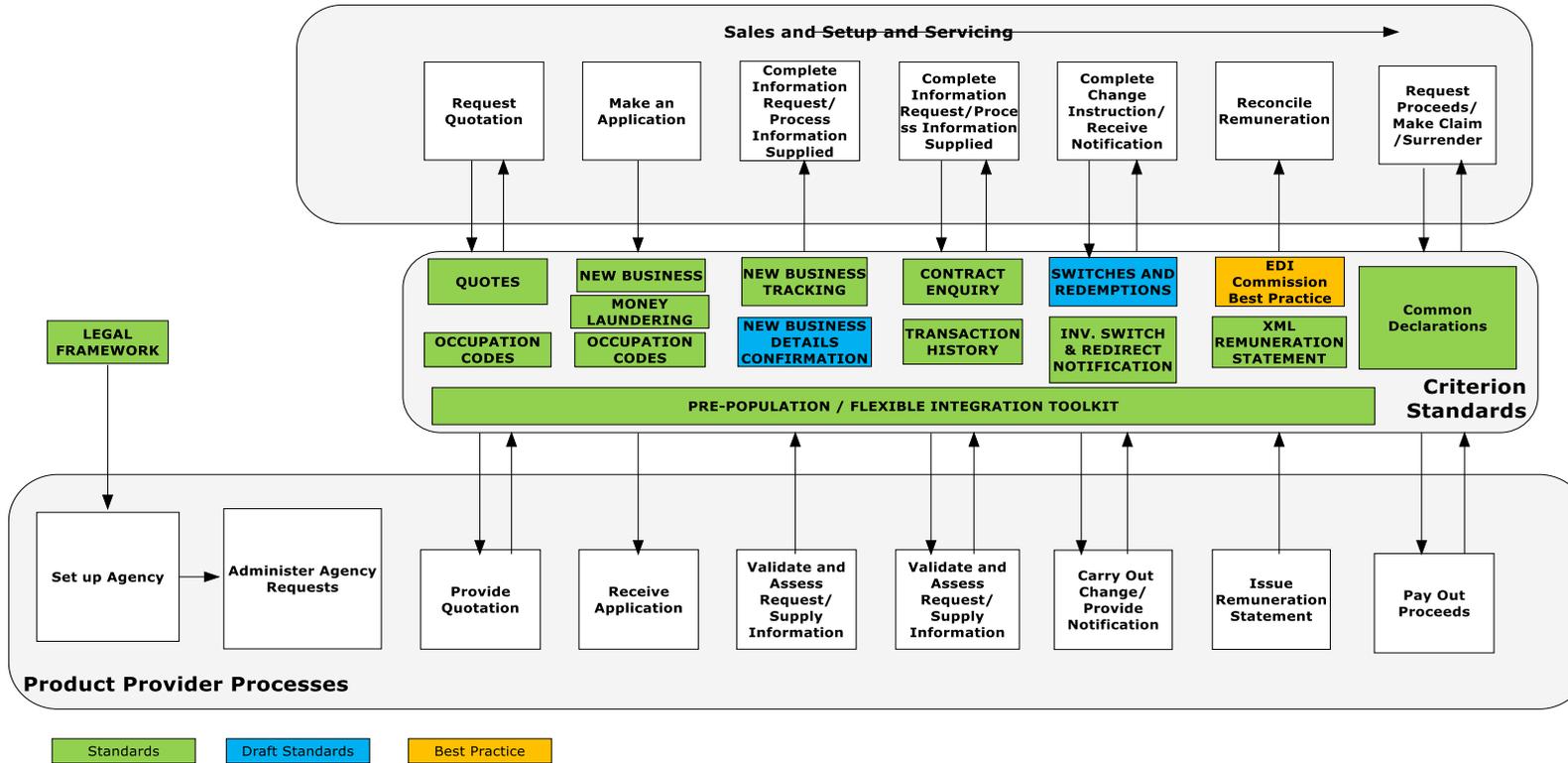
5.1 CRITERION COMMON DECLARATIONS

Criterion's Common Declarations help to remove paperwork from the pension transfer process. Backed and managed independently by the Industry and designed by its transfer experts, they remove the need for standalone discharge forms and lifetime allowance forms.

Find out more about [Common Declarations >](#)

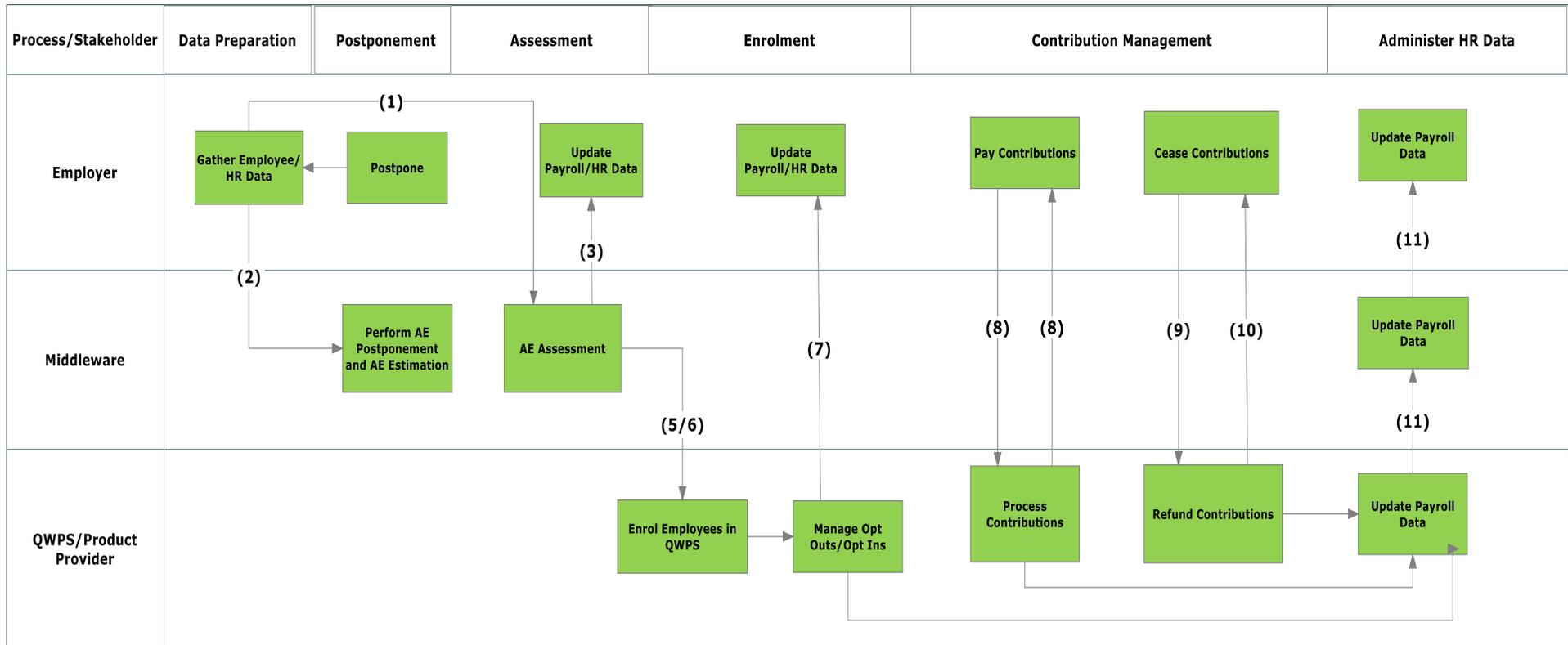
APPENDIX 1 – END TO END PROCESS DIAGRAM FOR LIFE AND PENSIONS

CRITERION MESSAGES SUPPORTING THE END TO END BUSINESS PROCESS



APPENDIX 2 – END TO END PROCESS DIAGRAM FOR AUTOMATIC ENROLMENT

The following diagram illustrates where AE Standards Support the AE Process.



The diagram above demonstrates one instance of the End to End process; others may use the Standards in a different context.

Key:

- (1) = Receive AE Assessment Employee List.
- (2) = Receive AE Postponement Estimation List.
- (3) = Receive AE Assessed Employee List.
- (4) = Receive AE Assessed Employee List for Enrolment (see Note a) below).
- (5) = Receive AE New Members List.
- (6) = Receive AE New Members Expanded List.
- (7) = Receive AE Opt In/Opt Out/Joiners List.
- (8) = Receive Group Contribution Collection List (see Note b) below).
- (9) = Receive Group Contribution Cessation List.
- (10) = Receive Group Contribution Refund List.
- (11) = Receive AE Payroll Single Update.

Note to Keys:

- a) The Receive AE Assessed Employee List for Enrolment is not covered in the diagram but this Standard would be used where a Scheme Provider for example simply receives the output of the AE Assessment for Enrolment from another party.
- b) The Receive Group Contribution Collection List has a data flow from Employer to Scheme Provider and a data flow from Scheme Provider to Employer to reflect that contribution information can either be payment advice or billing.
- c) The two unlabelled flows at the bottom right of the diagram represent internal processes not supported by AE Standards.