When the data migrated successfully, was the platform ready?

TSB Bank plc | United Kingdom | Migration incident April 2018 | Resolution 2022

COMBINED FCA / PRA PENALTIES	CUSTOMER REDRESS	CUSTOMER BASE	RETURN TO BUSINESS AS USUAL
£48.65m	**£32.7m**	**5.2m; significant proportion affected**	**10 December 2018**
S01	S01 | S02	S01	S02

DOCUMENTED EVENT

Over the weekend of 20-22 April 2018, TSB migrated most corporate-system operations, customer services and customer data to a newly built platform. The FCA and PRA found that the data itself migrated successfully, but the platform immediately experienced technical failures. Branch, telephone, online and mobile banking were disrupted; all branches and a significant proportion of TSB's 5.2 million customers were affected, and the bank did not return to business as usual until 10 December 2018. TSB paid £32.7 million in customer redress. In December 2022, the FCA and PRA imposed combined penalties of £48.65 million for operational-risk-management and governance failures, including inadequate organisation and control of the migration programme and inadequate management of outsourcing risks arising from a critical third-party supplier. [S01 | S02]

NFRISK SCENARIO ADAPTATION - NOT AN EXTERNAL FINDING

A migration reconciles every customer record successfully. The production platform, however, has not been demonstrated under realistic transaction volume, failure and recovery conditions, and key supplier-readiness evidence is largely self-attested. The successful data migration is treated as a proxy for end-to-end service readiness. Minutes after go-live, customers cannot reliably access the services that present and use the data.

STRESS-TEST QUESTIONS

01 Are data-migration integrity and live-platform readiness governed as two separate go-live decisions with separate accountable sign-offs?

02 Has the production platform been tested under realistic volume, dependency failure, recovery and customer-journey conditions?

03 Which critical supplier-readiness assertions have been independently verified rather than accepted through self-attestation?

04 Can governance stop go-live when reconciliation has passed but platform, resilience or supplier evidence remains incomplete?

CONNECTED RISK

Technology & Change Risk (primary)
Operational Resilience (contributing)
Third-Party & Concentration Risk (contributing)

FRAMEWORK RELEVANCE

Retrospective regulator-linked relevance: UK operational resilience
The FCA later used the TSB migration incident as an example in CP19/32, its consultation on operational resilience and impact tolerances. This establishes retrospective relevance; it does not mean the later framework applied to the 2018 event. [S03]

NFRISK PRACTITIONER INTERPRETATION

Completeness and correctness of migrated data and operational readiness of the platform serving that data are separate control decisions. A go-live gate should require independent evidence for each: reconciliation and integrity controls for the data; performance, capacity, recoverability, end-to-end service outcomes and supplier readiness for the platform. Passing one gate does not provide evidence that the other has passed.

PRIMARY-SOURCE REGISTER

S01 Financial Conduct Authority / Prudential Regulation Authority (2022)
TSB fined £48.65m for operational resilience failings
S02 Financial Conduct Authority (2022)
Final Notice: TSB Bank plc
S03 Financial Conduct Authority (2019)
CP19/32: Building operational resilience

EVIDENCE BOUNDARY Official findings are separated from the institutional scenario, framework interpretation and NFRisk practitioner view.