AVCs and Pensions Dashboards guide for LGPS administering authorities

Index

1.   Introduction

Using this guide

This guide must be read in conjunction the LGPS Pensions Dashboard connection guide for administering authorities. Definitions for all terms used in this guide can be found in the connection guide. This can be found on the:

- [Administrator guides and documents](#) page of www.lgpsregs.org
- [Administrator guides and documents](#) page of www.scotlgpsregs.org

National LGPS Technical AVC sub-group

This guide has been created by the Local Government Association (LGA) with help from the National LGPS Technical AVC sub-group. Its aim is to establish common approaches on the preparation and provision of AVC view data to the pensions dashboards ecosystem (hereafter known as 'dashboards' or 'ecosystem').

Thanks go to representatives from the Prudential, Leicestershire Pension Fund, Northern Ireland Local Government Superannuation Committee, Tyne & Wear Pension Fund, West Yorkshire Pension Fund, Heywood Pension Technologies, Civica and the Pension Administration Standards Association.

Why is this guide needed?

The Pensions Dashboards Regulations 2022 (as amended) make provision for pensions dashboards services. These are intended to enable individuals and other authorised persons, to request and view information relating to their pensions entitlements electronically.

In summary, you will need to reach agreements with you're AVC provider(s) about:

- how you will reconcile your main scheme benefits with your AVC data and how you intend maintain that reconciliation
- how your AVC view data will be sent to the ecosystem – multiple source or single source
- how you will determine your AVC matching criteria and illustration dates
- the circumstances by when estimated retirement income might be provided.

You will need to be able to accommodate a variety of approaches from different AVC providers. One size will not fit all.

How can this guide help you?

We believe even though a variety of approaches will be adopted in sending view data to the ecosystem, we should be able to achieve consistency within each form of approach. This guide helps you do that and expands on the AVC actions set out in the LGPS Pensions Dashboard connections guide.

Orphan AVCs

Orphan AVCs are AVCs where you do not hold the corresponding main scheme record eg the member might have transferred out their main scheme data.

This area is still under consideration. We will update this guide in due course.

2.   Your legal obligations

Regulation 17 of the LGPS Regulations 2013 (and equivalent predecessor regulations) requires the administering authority ('you') to establish an AVC scheme with a body approved for such purposes under the Finance Act 2004.

When you appoint an AVC provider to administrate your day to day AVC scheme, you are delegating responsibility to that provider to make sure the scheme is run in accordance with the LGPS Regulations and over-riding legislation. The provider must be suitably regulated in accordance with the Finance Act 2004 to provide regulated information to your members.

However you decide to send your AVC view data to the ecosystem, you remain responsible for the accuracy and provision of AVC view data. You should discuss with your AVC provider(s) how best to send your AVC view data to the ecosystem..

3.   Reconciling main scheme records with AVC records

Step one - reconciliation

The first step in the AVCs and dashboards process is to make sure your main scheme AVC records match your AVC provider(s) records. This is so when a user accesses a dashboard, the correct AVC view data is shown alongside the corresponding main scheme record. Unless the record is an orphan AVC, in which case we expect the AVC view data will be shown in isolation.

To reconcile your main scheme AVC data with that of your AVC provider(s) you will need to contact your AVC provider(s) to obtain your AVC data. Thereafter, you will need to work through the data and reconcile any differences.

Step two – maintain reconciliation

The second step in the process is to maintain your reconciliation.

You will need to devise a process to keep your main scheme AVC records and your AVC provider(s) records aligned. This is to make sure each time a user accesses a dashboard the correct AVC view data is shown alongside the corresponding main scheme record. Unless the record is an orphan AVC, in which case we expect the AVC view data will be shown in isolation.

Template reconciliation report

To help you, we have created a reconciliation template. This contains the fields we suggest your AVC provider(s) populate.

The template was designed with help from Prudential. Prudential confirm this template will be automated by September 2024 so it can be run as frequently as necessary.

Some of the fields may be local to Prudential, so you will need to agree the fields within the template with your AVC provider(s) before requesting its completion.

The template report can be found in appendix 1.

4.   Deciding how to send AVC view data to the ecosystem

Alongside the reconciliation of your main scheme AVC records with those of your AVC provider(s), and creating a process to main reconciliation, you also need to consider how your AVC view data will be sent to the ecosystem.

Before we look at the pros and cons of the various approaches – set out in section five, you should read this section. In this section we consider the following within the context of deciding how to send your AVC view data to the ecosystem:

- your legal obligations
- the data standards
- ready for change
- consider what is already in place.

Your legal obligation

As we have already set out in section two, the legal obligation to provide AVC view data to the ecosystem falls on you, though there will be two or more parties carrying out your duties – you and your AVC provider(s). You should be fully aware of how your dashboard duties will be carried out and take an active part in all the decision making.

Data standards

More information can be found in the [PDP data standards](#).

To support the wide variety of pension arrangements in the UK, where there are two or more parties involved, the data standards allow for three options to send view data to the ecosystem:

Multiple source linked

AVC view data sent direct to the ecosystem by your AVC provider(s)
Following a successful find request, your AVC provider(s) will send your AVC view data directly to the ecosystem. There will be a unique code to link the member's main scheme benefits with their AVC benefits.

Multiple source not linked

AVC view data sent direct to the ecosystem by your AVC provider(s)
Potentially there is another approach where your AVC view data is sent direct to the ecosystem by your AVC provider(s). This is where the unique code to link the member's defined benefits with their AVC benefits is not used.

We do not recommend this approach because we do not believe this will benefit your members experience of using dashboards.

Single source

AVC view data periodically sent to you by your AVC provider(s), for you to send to the ecosystem
Your AVC provider(s) will send your AVC view data to you periodically. Your AVC view data will need to be stored in a digitally accessible mode. You will need to agree the frequency of the periodic data provision with your AVC provider(s).

Following a successful find request, you will send your AVC view data directly to the ecosystem.

Ready for change

More information can be found in [PDP engagement with industry](#).

On publishing this guidance there has been very little end to end user testing of dashboards. There is a risk whatever we do now may need to change if members do not understand the information presented to them, or if dashboard usage changes member demands.

There is no merit in waiting. To properly test the end-to-end user experience, members need to see their pensions data. We also know from the experience of other nations' dashboards, members only really respond to seeing their own data, not made-up data.

To avoid a chicken and egg situation, the pensions industry must put its best foot forward and use its expertise and judgement on how to best serve its members. It must also weigh up the 'cost versus benefit' of the options for dashboards compliance, keeping in mind this is not the only way we communicate with members.

Consider what is already in place

Dashboards do not ask you or your AVC provider(s) to do anything you do not already have to do if the member asks you for information directly. So, consider what is already in place.

Ask yourself the following:

- how do our current ABS show main scheme benefits alongside AVCs?
- how do we prepare a retirement estimate where the member holds AVCs?
- if the member has a query concerning their AVCs who do they speak to?
- is there anything already in place we can repurpose for sharing dashboard information?

The data standards are designed to reflect the most common ways in which main scheme benefits and AVC benefits are communicated to members - either sent separately or combined by you in some way.

Therefore, we should consider the relative pros and cons of the three options through three lenses:

1. Getting ready and onboarding.

2. Live running

3. Supporting other pensions activities.

5.   Pros and Cons – multiple source v single source

Please read section four to understand the context of this section.

Multiple source – linked and not linked

You send your main scheme view data to the ecosystem and your AVC provider(s) send your AVC view data to the ecosystem – the multiple source approach.
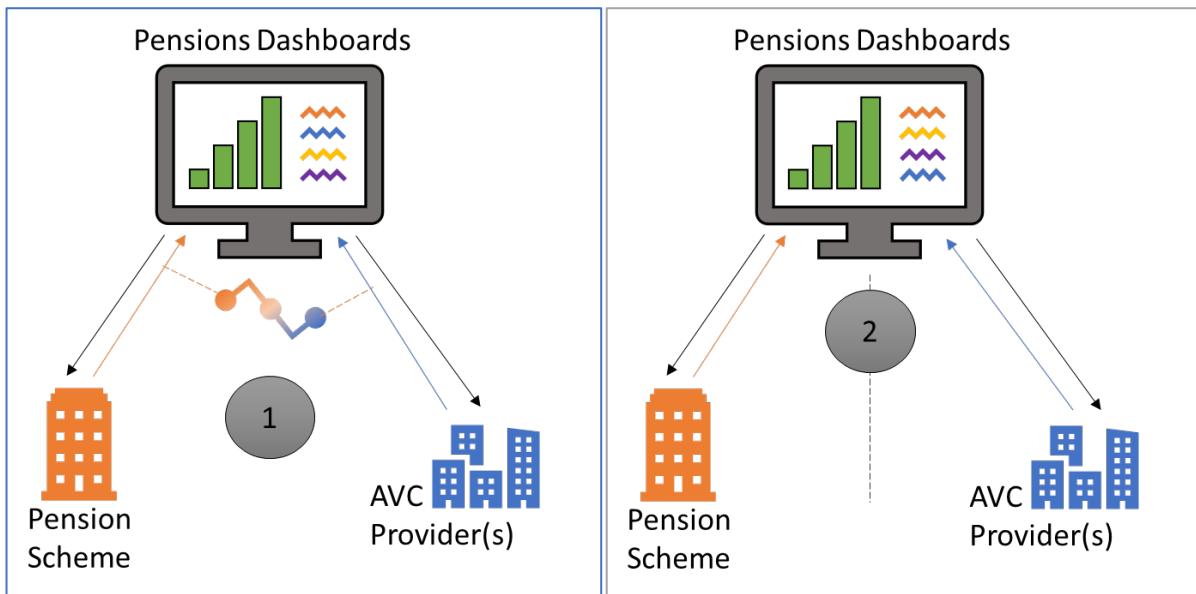
Multiple source - key components:

Both you and your AVC provider(s) respond separately to dashboard requests.

Matching, data submission and reporting carried out by both you and your AVC provider(s) simultaneously.

In option 1 – multiple source linked, each administering authority will generate a Globally Unique ID (GUID) that is local to them and send that to all their AVC provider(s) to use. Once live, this GUID value is sent in the value data that both you and your AVC provider(s) send to the ecosystem. This enables the dashboard's display rules to pin the two or more data entries together onscreen.

In option 2 – multiple source not linked, if no GUID is used, the order in which the pension benefits are displayed will be solely down to the display logic used by the chosen dashboard. The main scheme benefits and your AVC benefits might not be displayed together. We do not recommend using this option.

Multiple source – pros and cons

Getting ready and onboarding

It is important you and your AVC provider(s) work together to make sure your AVC data is reconciled with your main scheme data and is accurate and accessible – regardless of the approach chosen. This activity is not considered a pro or a con in this analysis - it is simply a necessity.

Multiple source - getting ready and onboarding	Pros	Cons
Data storage and formatting	You do not need to create a new interface between you and your AVC provider(s). You do not need to add any new storage to your pensions administration system.	The AVC information will appear as a separate pension benefit to the main scheme benefits scheme on the member's chosen dashboard. If a GUID is: • used, it will be displayed alongside your main scheme benefits • not used, you have no control over where your AVC view data is displayed.
Matching rule readiness		You will have to co-ordinate the data quality, data readiness and matching rule logic across all elements of both the main scheme view data and AVC view data. You will need to be confident the matching outcomes are the same. To achieve this the

Multiple source - getting ready and onboarding	Pros	Cons
		matching data held by both you and your AVC provider(s) and the application of the matching rules, will need to be the same. As administering authorities are likely to set different matching rules based on the confidence in their data availability and accuracy, you will need to check if your AVC provider can adopt bespoke matching criteria for your authority.
Designing processes		To allow for the fact a member might contact you rather than your AVC provider(s), and possibly vice-versa, both you and your AVC provider(s) will need to create new processes to allow for resolving possible matches and resolving queries. This is because each administrator will only have carried out one half of the data submission.
Onboarding		You will need to know how your AVC provider(s) plan to connect and meet

Multiple source - getting ready and onboarding	Pros	Cons
		their duties under the legislation. Your AVC provider(s) will need to demonstrate to you their connection is compliant and will remain compliant. You must be in control of the onboarding process and co-ordinate a live date with your AVC provider(s). Your AVC provider(s) cannot onboard your AVC view data before your 'connect by' date. You will also need assurance from your AVC provider(s) they have controls in place to prevent your AVC view data being onboarded early.

Live running

Multiple source - live running	Pros	Cons
Data storage	You will not need to factor in new processes for missing calculation values as this will be part of your AVC provider(s) messaging - although you	You will need to make sure your AVC provider(s) have processes in place to send stored AVC value data calculated within the prescribed date, to the

Multiple source - live running	Pros	Cons
	remain legally responsible.	ecosystem. Or a process in place to calculate the value and send this to the ecosystem within the 10 days set out in legislation.
Calculated results		You and your AVC provider(s) will need to co-ordinate the updating of calculation results in both the pensions administration system and your AVC provider(s) system(s). This is to make sure you are both sending value data to the ecosystem based on the same new illustration date.
Matching rule maintenance		Your will have to monitor your main scheme experience alongside that of your AVC provider(s), to make sure ongoing matching rule effectiveness. Any updates will need coordinating and testing with all your AVC provider(s) to go live concurrently.
Resolving possible matches		You may not know your AVC provider(s) has returned a possible match

Multiple source - live running	Pros	Cons
		unless the member contacts them.

You will need processes in place to co-ordinate resolving matches with your AVC provider(s) if the member has not contacted the AVC provider(s) directly. Also vice versa if the AVC matching was a full match and you are a possible match. |
| Handling queries | Where your members contact AVC provider(s) directly with their queries, the dashboard can display your AVC provider(s) contact details against your AVC view data. | You will not know what values have been sent to the ecosystem and you will be unable to respond to queries without either contacting your AVC provider(s) or having a separate way to see what your AVC provider(s) have sent. |
| Providing evidence to the regulator | | You will have to be able to combine your main scheme information with your AVC provider(s) information to respond to any regulator queries or requests for evidence.

You will need to make sure your AVC provider(s) are able to provide this information for both you |

Multiple source - live running	Pros	Cons
		and individual member(s) as necessary.

Supporting other pension activities

Multiple source - supporting other pension activities	Pros	Cons
Making other use of AVC data		Because you will not be holding dashboard compliant AVC view data, there are pros to benefit from holding that additional information eg you could automatically include the AVC value when manually providing estimates to members or automated estimates by way of your online provision.
Sharing information		Without new interfacing between you and your AVC provider(s), other processes will need to be in place. This is so any changes required by both parties are automatically provided if the member only updates one provider eg if a deferred member updates their surname with their AVC provider, but forgets to update you.

Single source

You take responsibility for sending AVC view data to the ecosystem – single source approach.
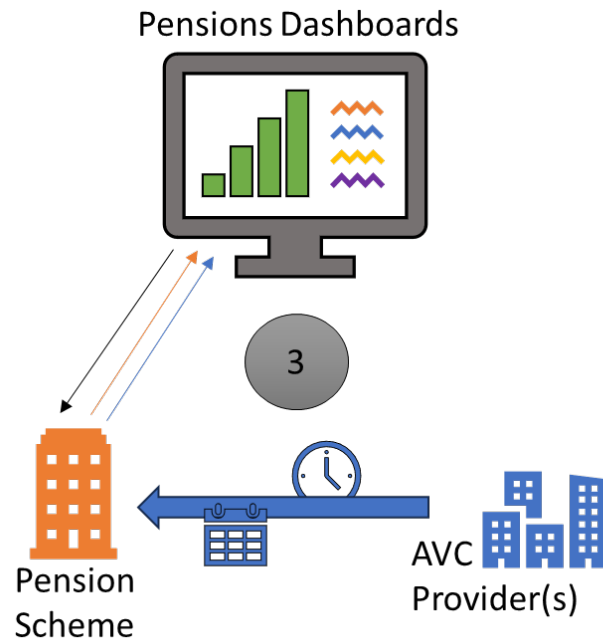
Single source - key components

In option 3, the AVC provider(s) send your AVC view data in bulk to you on a periodic basis or on demand.

You store the information ready for responding to dashboard requests when a member uses one.

Matching, data submission, reporting - all carried out by you.

Single source - Pros and Cons

It is important you and your AVC provider(s) work together to make sure your AVC data is reconciled with your main scheme data and is accurate and accessible – regardless of the approach chosen. This activity is not considered a pro or a con in this analysis - it is simply a necessity.

Getting ready and onboarding

Single source - getting ready and onboarding	Pros	Cons
Data storage & formatting	You can choose how you use the formatting to control how the information is displayed eg either send two complete sets of information, or one set of information with the estimated retirement income and accrued values repeating.	Unless you already receive and store all elements of AVC view data, new data interfaces and new storage will need to be added to the record keeping areas in the pensions administration system and in the AVC provider(s) systems. AVC providers have confirmed they might need to change their record keeping to support a new data interface.

This might result in additional charges from both your pensions administration software provider and your AVC provider(s). |
| Matching rule readiness | You will be solely responsible for matching against your own data and will not need to be checking and verifying your AVC provider(s) rules. | You will need to be able to align and apply the AVC view data to the correct member and if more than one member record, correct member employment record, in your pensions administration system.

Though this can done offline, away from live dashboard interactions to |

Single source - getting ready and onboarding	Pros	Cons
		make sure all the AVC view data is attributed correctly.
Designing processes	If you store and send all elements of the view data, it can be the single point of contact for member queries arising after a dashboard visit.	You will need to design new processes to make sure queries are resolved by the AVC provider(s) where members would normally contact the AVC provider(s) directly.
Onboarding	You are in complete control of the onboarding process and will not have to co-ordinate a live date with your AVC provider(s).	

Live running

Single source - live running	Pros	Cons
Data storage	You will be able to monitor your ongoing dashboard data readiness in one place.	You will need to make sure any stored AVC data is calculated within the prescribed date. Otherwise, you will need a process in place to make sure your AVC provider(s) can send updated values to you, so you can send this data to the ecosystem within the 10 days set out in legislation.

Single source - live running	Pros	Cons
Calculated results	You will find it easier to co-ordinate when new calculated results are presented to dashboards, combining the main scheme calculations with the AVC values, using the same illustration date.	
Matching rule maintenance	You can use your own experience to monitor your matching rule effectiveness and update the rule in one place, without coordinating and testing with your AVC provider(s).	
Resolving possible matches	You will only need look at your own data to resolve any possible matches. You are also the sole point of contact and so members will always know who and where to contact.	
Handling member queries	You will always know what values have been sent to the ecosystem and will be able to respond to queries.	If members are used to contacting your AVC provider(s) directly, the AVC provider(s) will need to liaise more with you to resolve queries. Though depending on the method you choose to submit data to the ecosystem, it might be

Single source - live running	Pros	Cons
		possible to hold a second set of contact details for your AVC provider.
Providing evidence to the regulator	You will hold all view data, including reporting data, so you will the single point of contact for regulator queries.	

Supporting other pension activities

Single source - supporting other pension activities	Pros	Cons
Making use of AVC data	You will hold dashboard-compliant AVC data. You can choose to use that information for other activities - such as retirement illustrations.	
Online portal	You can provide a single view of all a member's benefits by way of an online portal.	If your AVC provider(s) already provide online portals, there might be an issue if the data you display on an online portal is possibly around a year older than that displayed on your provider(s) real time portal. This could cause member queries if not annotated sufficiently.
Sharing information	If new interfacing is put in place, it could be the conduit to having one	

Single source - supporting other pension activities	Pros	Cons
	single way in which AVC provider(s) send information to you - for example, settling final retirement figures.	

Other considerations

How data may be submitted to the ecosystem

In the single source pros and cons section of providing view data, the ability to affect how the data was displayed is listed as a 'pro'.

Setting aside the source of approach – ie multiple versus single, there are two ways you can submit main scheme view data and AVC view data to the ecosystem. You should discuss the methods with your ISP.
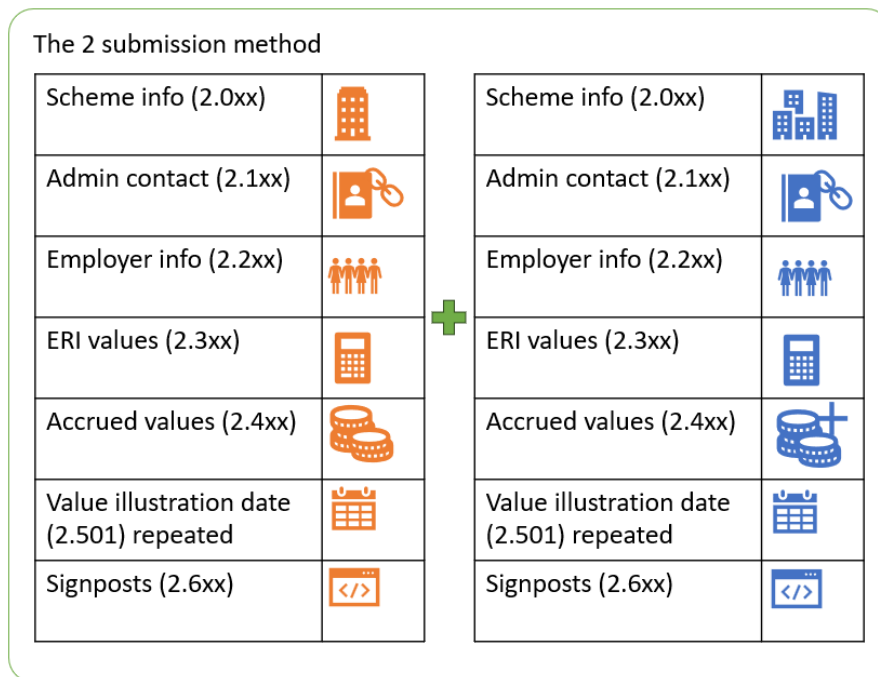
The data elements you return when asked for view data are:

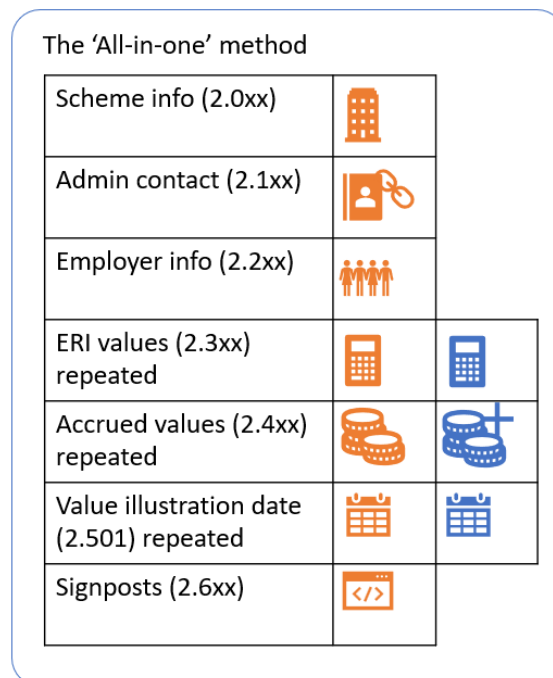| Data elements	Description
2.0xx pension arrangement data	information about the pension provider
2.1xx administrator data	who to contact about the pension benefits
2.2xx employment data	where applicable (optional)
2.3xx estimated retirement data	the values relating to the user's estimated retirement benefits
2.4xx accrued benefit data	the values relating to the user's benefits to date
2.5xx value data illustration date	The date at which the values in 2.3xx and 2.4xx were calculated
2.6xx signpost data	further information, such as annual reports and cost & charges

Elements 2.3, 2.4 and 2.5 can be sent multiple times within one submission.

The data standards support two methods of data submission. Represented visually, these are shown in the following two diagrams where the orange icons represent the scheme benefits, and the blue icons are the AVC benefits:

Two-submission method

The 2 submission method

Scheme info (2.0xx)		Scheme info (2.0xx)	
Admin contact (2.1xx)		Admin contact (2.1xx)	
Employer info (2.2xx)		Employer info (2.2xx)	
ERI values (2.3xx)		ERI values (2.3xx)	
Accrued values (2.4xx)		Accrued values (2.4xx)	
Value illustration date (2.501) repeated		Value illustration date (2.501) repeated	
Signposts (2.6xx)		Signposts (2.6xx)	

All-in-one submission method

The 'All-in-one' method

Scheme info (2.0xx)		
Admin contact (2.1xx)		
Employer info (2.2xx)		
ERI values (2.3xx) repeated		
Accrued values (2.4xx) repeated		
Value illustration date (2.501) repeated		
Signposts (2.6xx)		

Two-submission method versus All-in-one submission method

If you decide to use the multiple source approach, either linked or not linked, your data will automatically be shown separately as the two-submission method.

If you wish your data to be shown as repeating elements within one submission, as the all-in-one method, you will need to use the single source approach and have all your AVC view data held alongside the main scheme data.

If you decide to use the single source approach and hold your AVC data alongside your main scheme data, you could still choose to use the two-submission method if you think that would be clearer to the member. The final decision may require some user testing to gain some consistency.

Multiple scheme benefits and multiple AVCs

The data standards, specifically the use of the multiple source approach with a GUID, does not resolve the issue where your members have multiple benefits with multiple AVC policies attributed to separate employments.

When using the multiple source approach, if you and your AVC provider(s) use the same GUID for all submissions, there is a risk your AVC view data will not correspond with the correct main scheme benefits. This issue is not specific to the LGPS and not specific to AVCs. This is an issue for all schemes with multiple sections and multiple administrators and not yet been addressed by PDP.

The only way you can currently be sure the correct AVC policy is attributed to the appropriate main scheme employment record, is to adopt the single source approach. This is because you will be responsible for allocating the AVC data to the correct main scheme record and in turn, sending all the data to the ecosystem as a single return.

6.   AVCs dashboards risk register

To help you identify the main risks when undertaking AVCs and dashboards we have created a suggested dashboards risk register.

We have also scored the risks but these are merely suggestions as we appreciate you will have different views on risks and mitigations.

Our suggested scores are based on likelihood (L) and impact (1). With (1) been low and (5) high. The total risk is (L) multiplied by (I).

Our suggested risk register is set out in appendix 2.

7. Due diligence questions to ask your AVC provider(s)

Once you have decided your approach to sending AVC view data to the ecosystem you need to liaise with your AVC provider(s).

Findings indicate there are 10 AVC providers who LGPS administering authorities have entered into agreements to establish AVC schemes. These are:

- Aegon
- Aviva
- Clerical Medical
- Legal & General
- Phoenix Life
- Prudential
- Scottish Widows
- Standard Life
- Utmost Life & Pensions
- Zurich.

We have set out a series of due diligence questions you need to address with each of your AVC provider(s), your pensions administration software providers and your integrated service provider (ISP), depending on your approach ie multiple source or single source. These are set out in appendix 5.

8. Disclaimer

The information contained in this summary guide has been prepared by the LGPC Secretariat, a part of the LGA. It represents our views and should not be treated as a complete and authoritative statement of the law. Readers may wish, or will need, to take their own legal advice on the interpretation of any piece of legislation. No responsibility whatsoever will be assumed by either party for any direct or consequential loss, financial or otherwise, damage or inconvenience, or any other obligation or liability incurred by readers relying on information contained in this Guide.

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Appendix 1 – template reconciliation report

Heading	Description	Comments
NINO	Customer national insurance number if held	
Policy number	Unique identified for customer policy and is used on customer communications	
Title	Salutation used by customer in communications	
Surname	Customer surname	
Forename	Customer forename	
Initial	Initial for customer	
DOB	Customer date of birth	
NPA	Date at which scheme has set as being the normal pension age (NPA) / normal benefit age (NBA)	See appendix 3 for the definition of a scheme members NPA, and appendix 4 for the definition of a pension credit members NBA

Heading	Description	Comments
Intended retirement date	The date at which the member wishes to retire	This may be the same as NPA / NBA
Policy start date	Date at which the policy was added to the scheme	
Employer code	Alpha numeric between four to five digit code AVC provider uses to identify individual employer within the same scheme	
Employer name	Name of employer - supplied when policy set up associated with the employer code	
Scheme number	Unique identifier used for identifying different schemes	
Scheme name	Linked to employer name and scheme number to identify different schemes	
AVC policy status at policy number level	Contribution holiday – in force	
	Active – in force	
	Out of force	

Heading	Description	Comments
	Paid up - deferred	
Last contribution date paid	Last date premium paid against the policy	Must be last premium paid not last transaction as this will pick up AMC
Reconciliation Contribution Status at policy	Derived by Last Contribution Date Paid, if that date is within the last 12 months show as Active, if it is more than 12 months should show as deferred	
Owner1 Address Line 1	Address Line 1	If held, may be blank for some customers
Owner1 Address Line 2	Address Line 2	If held, may be blank for some customers
Owner1 Address Line 3	Address Line 3	If held, may be blank for some customers
Owner1 Address Line 4	Address Line 4	If held, may be blank for some customers
Owner1 Address Line 5	Address Line 5	If held, may be blank for some customers
Owner1 Postcode	Post code	If held, may be blank for some customers

Appendix 2 – AVCs dashboards risk register

Source	Risk	(L)	(I)	Total score
Multiple & Single	1. Failure of an AVC provider to liaise with you on dashboards, thereby not enabling compliance with the legislation	2	5	10
Multiple & Single	2. Failure to reconcile your AVC data	2	4	8
Single	3. Failure of the AVC provider to send you the AVC view data securely and in an agreed timely manner	2	5	10
Single	4. Failure of the AVC system provider to build a secure link	1	5	5
Single	5. Failure to make the pensions administrator system changes to hold the AVC view data	2	5	10
Multiple & Single	6. Monetary funds and / resource are not available to administer all dashboard requirements including but not limited to: - reconciliation process - dealing with member enquiries - liaising with employers / AVC provider to resolve queries - procure / purchase an integrated service provider - purchase an interface from AVC provider to you to maintain reconciliation	2	5	10

Source	Risk	(L)	(I)	Total score
Multiple & Single	7. Insufficient resource at the AVC provider to administer all dashboard requirements including but not limited to: - deal with your initial and ongoing reconciliation processes - resolving queries - ongoing data submission	2	5	10
Multiple & Single	8. Illustration dates between main scheme view data and AVC view data do not align	4	4	16

Appendix 3 – definition of normal pension age

Over the years normal pension age (NPA) has had various names. It was previously called normal retirement age and before that normal retirement date. For ease, all reference in this guide will be made to NPA. You should not confuse NPA with critical retirement age relating to the 85-year rule protections or the impact of the underpin where applicable.

LGPS England and Wales

2014 Scheme

Applies to members who leave active membership of the LGPS on or after 1 April 2014

- NPA = SPa or if later age 65

Members can defer payment to immediately before age 75. Where payment is made after NPA late retirement increases apply. Dashboards value data should include late retirement increases where appropriate.

2008 Scheme

Applies to members who left active membership of the LGPS on or after 1 April 2008 and before 1 April 2014

- NPA = age 65

The 2008 Scheme contains a protected NPA of age 60 for certain groups of members who have transferred by statute from elsewhere within the public service (eg meat hygiene, Learning and Skills Council, NHS). More information is in appendix B of the Discretions policy found in the Administrator guides and documents page of www.lgpsregs.org.

Members can defer payment to immediately before age 75. Where payment is made after age 65 late retirement increases apply. Dashboards value data should include late retirement increases where appropriate.

1998 Scheme

Applies to members who left active membership of the LGPS on or after 1 April 1998 and before 1 April 2008

- NPA = age 65, or
- a member who joined the scheme before 1 April 1998 and left active membership of the scheme before 1 October 2006, NPA = the earlier of:

  - age 60 if by that age, the member would have built up 25 or more years membership of the scheme if they had remained active until then, or
  - the date the member would have built up 25 years membership, if that date falls after age 60 and before age 65, or
  - age 65 if by that age, the member would not have built up 25 years membership of the scheme if they had remained active until then.

The 1998 Scheme contains a protected NPA of age 60 for certain groups of members who have transferred by statute from elsewhere within the public service (eg meat hygiene, civil service). More information is in appendix B of the Discretions policy found in the Administrator guides and documents page of www.lgpsregs.org.

Members can defer payment to immediately before age 75. Where payment is made after age 65 late retirement increases apply. Dashboards value data should include late retirement increases where appropriate.

1995 Scheme

Applies to members who left active membership of the LGPS before 1 April 1998

- NPA = the earlier of:

- age 60 if by that age, the member would have built up 25 or more years membership of the scheme if they had remained active until then, or
- the date the member would have built up 25 years membership, if that date falls after age 60 and before age 65, or
- age 65 if by that age, the member would not have built up 25 years membership of the scheme if they had remained active until then.

There is no option to defer payment beyond NPA in the 1995 Scheme, dashboard value data must be quoted at NPA so as not to overquote entitlement.

LGPS Scotland

2015 Scheme

Applies to members who leave active membership of the LGPS on or after 1 April 2015

- NPA = SPa or if later age 65

Members can defer payment to immediately before age 75. Where payment is made after NPA late retirement increases apply. Dashboards value data should include late retirement increases where appropriate.

2009 Scheme

Applies to members who left active membership of the LGPS on or after 1 April 2009 and before 1 April 2015

- NPA = age 65

The 2009 Scheme contains a protected NPA of age 60 for certain groups of members who have transferred by statute from elsewhere within the public service (eg, Scottish Administration's Learning Connections Division, Care Commission, the Social

Work Inspection Agency, Her Majesty's Inspectorate of Education, Scottish Legal Complaints Commission and persons formerly entitled to a pension under the SDS Scheme). More information is in appendix B of the Discretions policy found in the [Administrator guides and documents](#) page of [www.scotlgpsregs.org.](#)

Members can defer payment to immediately before age 75. Where payment is made after 65 late retirement increases apply. Dashboards value data should include late retirement increases where appropriate.

1998 Scheme

Applies to members who left active membership of the LGPS on or after 1 April 1998 and before 1 April 2009.

- NPA = age 65, or
- a member who joined the scheme before 1 April 1998 and left active membership of the scheme before 1 December 2006, NPA = the earlier of:

    - age 60 if by that age, the member would have built up 25 or more years membership of the scheme if they had remained active until then, or
    - the date the member would have built up 25 years membership, if that date falls after age 60 and before age 65, or
    - age 65 if by that age, the member would not have built up 25 years membership of the scheme if they had remained active until then.

The 1998 Scheme contains a protected NPA of age 60 for certain groups of members who have transferred by statute from elsewhere within the public service (eg Scottish Legal Services Ombudsman). More information is in appendix B of the Discretions policy found in the [Administrator guides and documents](#) page of [www.scotlgpsregs.org.](#)

Members can defer payment to immediately before age 75. Where payment is made after age 65 late retirement increases apply. Dashboards value data should include late retirement increases where appropriate.

1987 Scheme

Applies to members who left active membership before 1 April 1998

- NPA = the earlier of:

  - age 60 if by that age, the member would have built up 25 or more years membership of the scheme if they had remained active until then, or
  - the date the member would have built up 25 years membership, if that date falls after age 60 and before age 65, or
  - age 65 if by that age, the member would not have built up 25 years membership of the scheme if they had remained active until then.

There is no option to defer payment beyond NPA in the 1987 Scheme, dashboard value data must be quoted at NPA so as not to overquote entitlement.

Appendix 4 – definition of normal benefit age

Normal benefit age (NBA) only applies to pension credit members.

LGPS England and Wales

Where the debited member left active membership of the LGPS:

- on or after 1 April 2014 and the Pension Sharing Order effective date is on or after 1 April 2014, NBA = SPa or if later age 65. Pension credit members can defer payment to immediately before age 75. Where payment is made after NBA late retirement increases apply. Dashboards value data should include late retirement increases where appropriate.
- before 1 April 2014 or the Pension Sharing Order effective date is before 1 April 2014, NBA = age 65. There is no option to defer payment beyond age 65, dashboard value data must be quoted at age 65 so as not to overquote entitlement.

LGPS Scotland

Where the debited member left active membership of the LGPS:

- on or after 1 April 2015 and the Pension Sharing Order effective date is on or after 1 April 2014, NBA = SPa or if later age 65. Pension credit members can defer payment to immediately before age 75. Where payment is made after NBA late retirement increases apply. Dashboards value data should include late retirement increases where appropriate.
- before 1 April 2015 or the Pension Sharing Order effective date is before 1 April 2014, NBA = age 65. There is no option to defer payment beyond age 65, dashboard value data must be quoted at age 65 so as not to overquote entitlement.

Appendix 5 – multiple & single source due diligence questions

In appendix 5 the terms:

- 'we', 'our' and 'us' means you in your capacity as the administering authority
- 'you' and 'your' means your additional voluntary contribution (AVC) provider(s), your pensions administration software provider(PASP) and your integrated service provider (ISP), as appropriate.

Where appropriate we have placed notes with a question to help the respondent understand what you are looking for in their answer.

Source	Question applicable to:	Due diligence questions	Notes
Multiple & Single	AVC / PASP / ISP	1. With whom should we discuss pension dashboards within your organisation?	These should be people in your organisation who are able to make decisions on matching criteria, illustration dates, view data, contact details and the physical provision of view data to dashboards.
Multiple & Single	AVC / PASP / ISP	2. How do you intend to engage with us to implement your dashboard duties on behalf of our scheme members?	Engagement should cover, but is not limited to, frequency of meetings, creation of a project plan highlighting the key areas that need to be agreed and recording the outcomes.

Source	Question applicable to:	Due diligence questions	Notes
Multiple & Single	AVC / PASP / ISP	3. To implement dashboards on behalf of our AVC members, please confirm if you are proposing to issue a contractual template agreement or contractual letter of variation? If so the date by when this will be available	You will be providing a new service to us which includes compliance requirements, this might necessitate some form of amendment to our existing contractual arrangements. Any contractual change will probably require a review by our legal advisers.
Single	AVC	4. Please confirm if you will be able to provide us with our AVC view data by our 'connect by' date of 31 October 2025?	The LGPS 'connect by' date is 31 October 2025. Although not specifically stated, TPR have confirmed 'connect by' means connect within the month up to 31 October 2025. We may choose to change our 'connect by' date. We will confirm this date in due course.
Single	AVC	5. In what secure format do you intend to send our AVC view data to us?	Our AVC view data must be in a format that can be interfaced with our pensions administration system or be dropped into an existing interface. This is so it can be stored in our pensions administration system database and be extracted and made available to our selected ISP.

Source	Question applicable to:	Due diligence questions	Notes
Single	AVC	6. How frequently do you intend to send our AVC view data to us?	You will need to consider the requirement for the illustration date of the main scheme value data and the AVC value data, to be the same. Where calculations are not stored or they are incorrect, there will need to be a mechanism for you to send us updated calculations using the same illustration date as the main scheme value data.
Single	AVC	7. How will you demonstrate you can continue to send our AVC view data to us so we can remain dashboards compliant?	We expect regular compliance reports demonstrating your continued compliance.
Single	PASP / ISP	8. How will we store AVC view data in a digitally accessible mode for this to be sent to the ecosystem for display on dashboards?	We need to make sure you are able to store our AVC view data. This data is not normally stored on our pensions administration systems and development work may be required. Though it may be able to be stored within our ISP.
Multiple	AVC	9. How do you intend to connect to the ecosystem at the same time as us?	Our 'connect by' date is 31 October 2025. Although not specifically stated, TPR have confirmed 'connect by' means connect within

Source	Question applicable to:	Due diligence questions	Notes
			the month up to 31 October 2025. We may choose to change our 'connect by' date. We will let you know in due course.
Multiple	AVC	10. How will you demonstrate your connection remains compliant as required in the data standards?	Whilst we understand the majority of reporting will be directly derived from the ecosystem, we expect you to provide information to us so we can be assured the service you are providing is compliant.
Multiple	AVC	11. What matching criteria do you intend to use for our AVC members?	Ideally the personal data used to form the AVC matching criteria will be the same for both the member's main scheme benefits with us and their AVC benefits held with you.
Multiple	AVC	12. How will you demonstrate you have kept a copy of your matching criteria decision making, in line with the requirements set out in the Pensions Dashboards Regulations 2022?	The Pensions Dashboards Regulations 2022 state your matching criteria decision making, must be kept for at least six years from the end of the scheme year in which the decision was made.
Multiple	AVC	13. How will you regularly review the personal data used to form the AVC matching criteria on behalf of our	We will also regularly review the personal data used to form our main scheme matching criteria to assess if any changes

Source	Question applicable to:	Due diligence questions	Notes
		members, to assess if any changes are required to improve the accuracy of results?	are required to improve the accuracy of results. Any changes will need to be co-ordinated by both parties.
Multiple	AVC	14. How and when will you assess if the personal data used to form the AVC matching criteria on behalf of our members, is accurate and digitally accessible?	It might be possible to utilise the cleansed data held with us to help you. Please discuss this with us. If required, you will need to put a plan in place to improve the accuracy and digital accessibility of our AVC matching criteria and confirm to us the plan has delivered its improvements.
Multiple	AVC	15. How will you maintain the accuracy and digital accessibility of the personal data used to form the AVC matching criteria on behalf of our members?	
Multiple	AVC	16. What internal process have you established to confirm the identity of any possible match who contacts you?	We will not be able to resolve possible matches against the data you hold – you must have an appropriate solution in place to support individuals with these requests,

Source	Question applicable to:	Due diligence questions	Notes
			for example, making a helpline available or some other form of digital resolution.
Multiple	AVC	17. Where a possible match turns into a positive match, what process will you undertake to update the underlying record to make sure the next dashboard request results in a positive match?	We will expect you to engage with us regarding any updates to the underlying record.
Multiple	AVC	18. How frequently will you review partial match rates and causes, and report this information to us?	We will need this information as part of our governance procedures.
Multiple	AVC	19. What are your plans for notifying us of any changes to a member's personal AVC data?	For example: a deferred member might update their address with you – how will this be communicated / reconciled with us.
Multiple & Single	AVC	20. Please confirm if you are preparing a standard pack of Information Security or if you require us to detail the information needed?	TPR recommends you will need to produce or update your Data Protection Impact Assessment (DPIA) to take account of the AVC matching criteria policy decision. We

Source	Question applicable to:	Due diligence questions	Notes
			will also need to do this and will need your cyber security information to do so.
Multiple & Single	PASP / ISP	21. Many members have multiple records, how will you validate the AVCs are attributed to the correct main scheme record?	
Multiple & Single	AVC	22. What AVC member data do you hold?	This is to identify how we will be able to reconcile our records of AVC members held on our pensions administration system with those held by you.
Multiple & Single	AVC	23. How do you intend to approach reconciling our AVC membership data with the records held by us?	There will need to be a regular reconciliation process between both of us to account for ongoing changes. A recent AVC reconciliation exercise carried out indicated incorrect national insurance numbers, records of members paying AVC s but the administering authority had no record of these contributions, and the administering authority had members paying AVCs but

Source	Question applicable to:	Due diligence questions	Notes
			these were not shown on the AVC provider's schedule.
Multiple & Single	AVC	24. When will you assess our AVC view data for accuracy and digital accessibility	It might be possible to utilise cleansed data from us to help you. Please discuss this with us. If required, you will need to put a plan in place to improve the accuracy and digital accessibility of our AVC view data and confirm to us the plan has delivered its improvements.
Multiple & Single	AVC	25. How will you maintain the accuracy and digital accessibility of the AVC view data?	
Multiple	AVC	26. What name of the arrangement are you proposing to use for us so members can link their AVCs with the correct LGPS administering authority and correct LGPS employment?	This could be as simple as the: LGPS England & Wales / LGPS Scotland. However, where the member has multiple LGPS benefits this might need to be drilled down further, for example:

Source	Question applicable to:	Due diligence questions	Notes
			(1) LGPS England & Wales – Teesside Pension Fund, and (2) LGPS England & Wales – Haringey Pension Fund. Where the member has multiple LGPS benefits within the same LGPS administering authority a third level may be needed, for example: (1) LGPS England & Wales – West Yorkshire Pension Fund – Bradford City Council, and (2) LGPS England & Wales – West Yorkshire Pension Fund – Leeds City Council.
Multiple	AVC	27. Please confirm you will be populating the pension type as 'AVC'?	We think this should always be AVC, though please advise if there are any circumstances if this will not be the case.
Multiple	AVC	28. How will you ensure the correct pension origin will be allocated to each AVC member?	You will need to be able to identify if, for example, any members should have an origin of WC – pension credit member.
Multiple & Single	AVC	29. What date will you use for the pensions start date?	This might be the date of the first contribution or an alternative date.

Source	Question applicable to:	Due diligence questions	Notes
Multiple & Single	AVC	30. Do you hold AVC view data at member or employment level?	Our main scheme view data will be sent to the ecosystem at employment level in accordance with the scheme rules. Member's pay contributions in relation to an LGPS employment [regulations 3(3), 3(4) and 9(1) of the LGPS Regulations 2013 & regulations 3(2), 3(3) and 9(1) LGPS (Scotland) Regulations 2018]. ABS statements and calculations in the LGPS are linked to individual employments. So if the member has multiple employments separate statements will be issued and separate benefits will be shown on dashboards. Our AVC value data must follow this approach.
Multiple & Single	AVC	31. Can you confirm if you plan to include employment start and end dates with our AVC view data?	Employment start and end dates can be inserted, these are optional fields in relation to employment data.

Source	Question applicable to:	Due diligence questions	Notes
Multiple & Single	AVC	32. Please confirm the estimated retirement income (ERI) benefit type you are proposing to use for our members?	We think this should always be AVC, though please advise if there are any circumstances if this will not be the case.
Multiple & Single	AVC	33. When providing either accrued and ERI data in what circumstances do you anticipate populating the 'end date'?	
Multiple & Single	AVC	34. When providing either accrued and ERI data, are you aware of any circumstances where the 'increase' will be above zero?	
Multiple & Single	AVC	35. When providing either accrued and ERI data, are you aware of any circumstances where the value of 'safeguarded benefits' will be above zero?	If the AVC does not contain safeguarded benefits please state as such.
Multiple & Single	AVC	36. When providing either accrued and ERI data, please advise which warnings you will use and how you anticipate sourcing the data necessary to make	

Source	Question applicable to:	Due diligence questions	Notes
		sure the right members see the correct warning?	
Multiple & Single	AVC	37. When providing either accrued and ERI data, please list the value data unavailable codes you will be using and for which members.	In particular we are interested to understand whether you will provide accrued value data for members who have passed their benefits payable date even though an ERI figure is not appropriate. If you are planning to use the DCC code, please provide details of your process to ensure that you meet the 10-day compliance requirements for this data to be available to the member.
Multiple & Single	AVC / PASP / ISP	38. How will you differentiate between AVCs for investment and AVC life cover?	AVCs for life cover is not in scope of dashboards.
Multiple & Single	AVC	39. How do you differentiate between shared cost AVC and AVCs for the purpose of displaying on dashboards?	We do not believe it matters whether the AVC is a pure member AVC or a shared cost AVC. We are interested to hear your thoughts.

Source	Question applicable to:	Due diligence questions	Notes
Multiple & Single	AVC	40. How will you approach orphan AVCs?	An orphan AVC is where there are no main scheme benefits. This can happen where the member has transferred their main scheme benefits out of the scheme or aggregated them with another LGPS administering authority.
Multiple & Single	AVC	41. How will you identify members who are not in scope of dashboards?	For example, members with main scheme benefits in payment - though the member deferred payment of their AVCs.
Multiple & Single	PASP / ISP	42. Where the member does not hold main scheme benefits with us, how will orphan AVCs will be stored on our pensions administration system?	This situation can occur where the member has transferred out of the LGPS or aggregated to another LGPS administering authority. Some of these members will be identified at the reconciliation stage, however, we will need a process for new cases that arise.

Also, where the member aggregates their main scheme benefits and leaves behind their AVC, the member can take 100 per cent of their AVCs as tax free cash provided, they are within HMRC limits and they are |

Source	Question applicable to:	Due diligence questions	Notes
			taken at the same time as the aggregated benefits. In this situation there needs to be a GUID between the orphan AVCs and the main scheme benefits held with another administrator. However, we understand the GUID is generated at scheme level not administrator level.
Multiple & Single	AVC	43. What is your process to inform us about new LGPS AVC members?	Regulation 24(3) of the Pensions Dashboards Regulations 2022 confirms for a new joiner - administrative data must be supplied within three months of the member joining the scheme. Regulation 26(6) confirms for a new joiner value data must be supplied as soon as practicable and by no later than the earlier of the date the first ABS is produced or 12 months after the end of the member's first full scheme year. There does not appear to be any differentiation in the regulations between joining the main scheme and joining the AVC scheme, yet rarely are these dates the same. In almost all cases the member joins the main scheme

Source	Question applicable to:	Due diligence questions	Notes
			and at a later date starts to pay AVCs. Where the member is not a new joiner for the purpose of the main scheme, the regulations do not seem to prescribe they can be a new joiner for the purpose of the AVC scheme – thus meaning AVCs will rarely if at all have 'new joiners' and administrative and value data will need to be supplied in respect of AVCs immediately / 10 days depending upon circumstances.
Multiple	AVC	44. How do you differentiate between an active AVC member, a deferred AVC member, a deferred pensioner member, a deferred refund member, a main scheme pensioner member but deferred AVC member and flexible retiree AVC member?	Only active AVC member's, deferred AVC members and deferred AVC pensioner members are in scope of dashboards. We understand, you might hold an individual as 'deferred' because they are no longer paying contributions, but we may hold this person as 'active' because they are an active contributing member. We are not sure if this matters for the purpose of providing AVC value data?

Source	Question applicable to:	Due diligence questions	Notes
			Also, members who have taken flexible retirement or partial flexible retirement, or members who have deferred payment of their AVC following retirement, are not in scope of dashboards and should not be available to find requests, even though they might still be contributing to the main scheme and our AVC scheme.
Multiple & Single	AVC	45. What solution do you have in place to support individuals raising data queries with you?	We will not be able to resolve our AVC data queries. You must have an appropriate solution in place to support individuals with these requests, for example, making a helpline available or some other form of digital resolution.
Multiple & Single	AVC	46. Will you name the member's most recent employer(s) – up to 10 maximum, or confirm if there are multiple employers?	We expect you to engage with us when making this decision.
Multiple & Single	AVC	47. Will you provide ERI values where this is optional?	We expect you to engage with us when making this decision.

Source	Question applicable to:	Due diligence questions	Notes
			In making this decision we both need to keep a record of how we decided the outcome and the parties we communicate with in doing so.
Multiple & Single	AVC	48. What do you intend to use as our AVC illustration dates?	The Pensions Dashboards Regulations 2022 prescribe that the illustration date must be consistent across all parts of the scheme – main scheme and AVCs. We will need to agree a process with you to achieve this outcome both for stored calculations and on call calculations.

ABS must be provided to each active, deferred, pension credit and deferred pensioner members [regulation 89(1) LGPS Regulations 2013 & regulation 84(1) LGPS (Scotland) Regulations 2018]. The Dashboards Regulations 2022 state value data is derived from a statement sent to the member in the last 13 months or a calculation performed in the last 12 months – calculated in accordance with the scheme |

Source	Question applicable to:	Due diligence questions	Notes
			rules [regulation 26(3) and paragraph 2 – schedule 3 Dashboards Regulations 2022]. ABS statements and calculations in the LGPS are linked to individual employments so if the member has multiple employments separate statements will be issued and separate benefits will be shown on dashboards. Our AVC value data must follow this approach. In making this decision we both need to keep a record of how we decided the outcome and the parties we communicate with in doing so.
Multiple & Single	AVC	49. How will you keep the AVC scheme illustration dates in line with the main scheme illustration dates when you provide members with new illustrations in future scheme years?	

Source	Question applicable to:	Due diligence questions	Notes
Multiple & Single	AVC	50. How will you approach providing AVC value data with the same illustration date as the main scheme benefits where an SMPI statement has not been issued but an annual benefit statement showing the main scheme benefits has been issued?	
Multiple & Single	AVC	51. How will you define your AVC payable dates?	DWP have indicated the AVC payable date can be decided at scheme level. We understand preferred / target retirement date used for AVCs has no legal basis and we should use the Scheme's normal pension age (NPA) or normal benefit age (NBA) for pension credit members. See appendix 3 for the definition of NPA and appendix 4 for the definition of NBA.
Single	AVC	52. Where AVC value data is already stored – how will you make sure you have sent us our AVC view data, for us	The AVC value data should reflect the requirements set out in AS TM1 using the

Source	Question applicable to:	Due diligence questions	Notes
		to send to the ecosystem immediately upon us receiving of a find request?	same illustration date as the main scheme benefits.
Multiple	AVC	53. Where AVC value data is already stored - are you able to provide our AVC view data immediately upon receipt of a find request?	The AVC value data should reflect the requirements set out in AS TM1 using the same illustration date as the main scheme benefits.
Single	AVC	54. Where AVC value data is not already stored or it is out of date – how will you make sure you send us our AVC view data, for us to send to the ecosystem within 10 days of us receiving a find request?	The AVC value data should reflect the requirements set out in AS TM1 using the same illustration date as the main scheme benefits.
Multiple	AVC	55. Where AVC value data is not already stored or it is out of date – are you able to provide the AVC value data to the ecosystem within 10 days?	The AVC value data should reflect the requirements set out in AS TM1 using the same illustration date as the main scheme benefits.