Pensions Dashboards before and after connection guide for LGPS administering authorities

Index

1. Introduction

What is this guide for?

This guide is to help administering authorities identify the steps needed to connect to the pensions dashboards ecosystem (referred to as 'ecosystem' from this point). It reflects our understanding of the intention of the regulations.

It does not duplicate information available elsewhere. It provides a synopsis of each topic with hyperlinks to where you can find detailed information online. These links are at the start of each section. The Pensions Regulator's (TPR) dashboards guidance is your first port of call, supported by guidance from the Pensions Dashboards Programme (PDP) and the Pensions Dashboards Working Group (PDWG) a group supported by the Pensions Administration Standards Association (PASA).

This guidance is tailored specifically for the LGPS.

How can this guide help you?

You will need to create a project plan to implement dashboards and have a plan to meet your dashboard duties after connection to the ecosystem, this guide helps you do that. It sets out the necessary actions and decisions and whether these need to be taken before or after connection. These are detailed throughout the guide and summarised in the ' Before and after connection checklist' in appendix one.

AVCs and dashboards

This guide covers additional voluntary contributions (AVCs) to help you understand how AVCs fit into the overall picture of sending view data to the ecosystem. It includes detailed information about AVC view data, timings to provide AVC view data, AVC matching criteria and decisions to be made about AVCs.

However, AVCs are a complex area, so we have produced a separate guide called 'AVCs and Dashboards' to compliment this guide. It provides lots of practical information covering:

- reconciling main scheme records with AVCs – including a template reconciliation report
- deciding how to send AVC view data to the ecosystem – single source versus multiple source, including the pros and cons of each approach
- AVC dashboard risks – including an AVC dashboard risk register

- the questions you need to ask your AVC provider(s) – separated between single source and multiple source for ease.

Both this guide and the AVC and Dashboards guide can be found on the Administrator guides and documents page of www.lgpsregs.org and www.scotlgpsregs.org.

2. Background

What are pensions dashboards ('dashboards')?

Dashboards will show users their pensions information online, securely and all in one place. There will be:

- a non-commercial dashboard run by the Money and Pensions Service (MaPS)
- commercial dashboards called qualifying pensions dashboards services (QPDS) run by commercial organisations such as insurance companies, banks.

To make dashboards work multiple parties and technical services need to connect to the ecosystem.

The ecosystem encompasses dashboards, data providers' find and view interfaces and the central digital architecture. See PDP's website for more information and a helpful video about the different components of the ecosystem.

The ecosystem does not hold personal information supplied by users or pensions information supplied by you. Instead, it functions like a giant switchboard, connecting users with their pensions via dashboards.

Do you have to connect?

Yes, the Pensions Dashboards Regulations 2022 ('the regulations') set out in law connection to the ecosystem and maintenance of connection, is a legal requirement for most pension schemes. The regulations confirm that schemes must connect to the ecosystem by the 'connection deadline' of 31 October 2026.

To avoid placing undue strain on all parties facilitating connection, the Department for Work & Pensions (DWP) published guidance on connection: the staged timetable, in March 2024 which has since been updated. The guidance confirms public service pension schemes should 'connect by' 31 October 2025. TPR has confirmed 'connect by' means connecting within the month of October 2025.

3. Who does what?

The Money and Pensions Service (MaPS)

MaPS dashboards homepage.

MaPS is an executive non-departmental public body and is responsible for delivering dashboards to users, including:

- establishing a programme team to lead the implementation of dashboards – the Pensions Dashboards Programme (PDP)
- appointing an industry steering group to set the strategic direction of the programme
- creating and running a non-commercial dashboard – the MaPS dashboard
- sending data to the Pensions Regulator (TPR) and the Financial Conduct Authority (FCA) to help them perform their compliance and enforcement functions.

The Pensions Dashboards Programme (PDP)

PDP homepage.

PDP is part of MaPS, it is responsible for:

- delivering the digital architecture and services that enable data providers and dashboard operators to inter-operate
- issuing the standards and guidance containing rules and controls relating to the practical operation of dashboard services and the digital infrastructure needed to support them.

The Pensions Regulator (TPR)

TPR Pensions dashboards: guidance.

TPR has published guidance and ‘Before and After connection checklists’ for occupational pension schemes in relation to:

- the Pensions Dashboards Regulations 2022 (‘the Regulations’) as amended, made by the Department for Work and Pensions (DWP)
- the standards and guidance produced by MaPS.

TPR is also responsible for the compliance and enforcement of the regulations by occupational pension schemes. It may exchange information with the Financial

Conduct Authority and Information Commissioners Office where it is of interest to the other party(s). TPR will target its action where it perceives the greatest risk to savers might occur.

TPR will support occupational pension schemes and those that help them through a comprehensive programme of targeted communications. The communications aim to help drive awareness and understanding of duties and what needs to be done to prepare. Communications include dashboards guidance, before and after connection checklists, hosting and attending webinars and other industry events, as well as 121 meetings with key stakeholders.

The Financial Conduct Authority (FCA)

FCA homepage.

The FCA is responsible for the making and compliance of rules, requiring personal and stakeholder pensions to be on dashboards. This affects providers of individual and group stakeholder and personal pensions, such as life insurance companies and operators of self-invested personal pensions (SIPPs).

FCA is also accountable for regulating firms operating qualifying pensions dashboards services (QPDS).

The Information Commissioner's Office (ICO)

ICO homepage.

The ICO is the cross-sector regulator for data protection legislation in the UK. The ICO regulates the compliance of you (as data controllers) and your service providers (as data processors). You need to make sure you have controls in place to ensure your data is accurate and used appropriately. The ICO will target their action where they perceive the greatest risk to savers might occur.

The Pensions Administration Standards Association (PASA)

PASA dashboards homepage.

PASA is a community interest company set up as a not for profit organisation and a membership only organisation – run by members for members. It provides pensions administration guidance, with an aim to drive up standards across the industry.

The PASA Pensions Dashboard Working Group (PDWG) was established to work with MaPS and other stakeholders as they develop the dashboard solution. The

Local Government Association is part of the PASA Dashboards Working Group (PDWG) and various sub-groups. The objective of the PDWG and its sub-groups is to provide support and input to TPR and MaPS on the implementation of dashboards. The group has produced industry wide guidance that we refer to throughout this guide.

4. Keeping you and your stakeholders up to date

As part of your day to day governance of implementing dashboards you should keep up to date with the latest guidance and developments.

Section 3 sets out 'Who does what' and has links to the relevant webpages of each organisation. These pages are updated when new information is available. You should regularly review these pages to keep up to date. Most of the organisations have the facility to sign up for news alerts on dashboards, if you have not already done so we recommend you sign up.

You should also discuss dashboards with your relevant stakeholders to make sure they are up to date with the latest developments. Relevant stakeholders are, though not limited to, your software provider, actuary, legal adviser, employers, AVC provider(s) – including those providers who maintain closed AVC policies, and if your administration is handled by a third party, your third party administrator.

Governance action

- before and after connection, sign up for online news alerts on dashboards
- before and after connection, keep up to date with the latest information and developments on dashboards
- before and after connection, discuss dashboards with your relevant stakeholders and establish if they are up to date with the latest information and developments.

5. Governance

It is important your pensions committee and local pension board are kept up to date with the latest guidance and developments on dashboards. This includes your plans to implement dashboards and maintain dashboards once live.

Dashboards should be a standing agenda item at each meeting. Initial updates should include the latest position on:

- industry developments
- 'connection deadline' date of 31 October 2026

- ‘connect by’ date, within the month of October 2025
- dashboards available point (DAP) – the date dashboards are made available to the public
- accuracy and digital accessibility of your data
- choosing an integrated service provider (ISP)
- AVCs and dashboards
- budget
- resource.

The updates you provide to your Committee/Board will change over time. For example, you might include data matching criteria, the calculation of value data and your approach to sending AVC view data to the ecosystem. Once connected you might provide a compliance summary report detailing how you comply, or not, with your ongoing dashboard duties.

Governance action

- before and after connection, make sure dashboards are a standing agenda item at your pensions committee and local pension board meeting
- before and after connection, make sure your updates contain the latest position on dashboards – both industry wide and at your administering authority.

6. Accuracy and digital accessibility of data

More information can be found in:

- TPRs Scheme member data quality
- PDWG guidance
- LGA AVCs and Dashboards administrator guide – Administrator guides and documents page on www.lgpsregs.org and Administrator guides and documents page on www.scotlgpsregs.org

Implementing dashboards does not need you to hold any new information about main scheme benefits. However, you will need to hold new information for AVCs where your AVC provider(s) sends view data to you to send to the ecosystem (single source approach) – as opposed to your AVC provider(s) sending the view data directly to the ecosystem (multiple source approach).

Pension records must be held digitally so they can be digitally matched and returned for display, on whichever dashboard your members choose to use. This means, all view data must be accurate and digitally accessible. This includes your AVC view data.

The responsibility for complying with the Pensions Dashboards Regulations 2022 in relation to AVCs lies with you as the administering authority, not the AVC provider. This means you are responsible for ensuring AVC view data is accurate and digitally accessible.

You will need to work with your AVC provider(s) to help you with this. You will need to agree with your AVC provider(s) how your AVC view data will be cleansed, made digitally accessible and reconciled to your main scheme records.

You should already be complying with TPR's Common and Scheme-specific data record keeping and regularly reporting your data quality measures, as part of your TPR scheme return. You should incorporate dashboards data requirements into your wider data management plan including your approach to cleansing, digital accessibility and matching your AVC view data.

Example of the impact of inaccessible records

> A member joins the scheme on 1 September 2026 and accesses a dashboard to obtain their pension information on 1 November 2026. Your ISP cannot find the member on your pensions administration system – no match is returned to the ecosystem.
>
> Although the person is a member of the LGPS your ISP cannot find the member on your pensions administration system because their information has not been uploaded within a timely manner.
>
> If you do not have interfaces with your employers to upload new starters to your pensions administration system on a regular basis this may increase your no match outcomes, leading to member complaints and enforcement action by TPR. TPR will be monitoring member complaints relating to dashboards. Please see section 18 – operational information and reporting, and section 19 – compliance and enforcement, for more information.

Governance action

- before and after connection, determine how your main scheme view data will be cleansed, made digitally accessible and remain so after connection
- before and after connection, agree with your AVC provider(s) how your AVC value data will be cleansed, made digitally accessible, reconciled to your records and remain so after connection.

Internal controls action

- before connection, incorporate dashboards data requirements into your wider data management plan including your approach to cleansing, digital accessibility and reconciling your AVC data
- before connection, regularly review your wider data management plan to determine where you are at.
- after connection maintain your plan(s).

7. Internal controls and record keeping

More information can be found in:

- TPR Code of practice
- PDP Reporting standards

You are expected to operate internal controls in line with TPR Code of practice that came into force on 28 March 2024.

Internal controls

The internal controls are, though not limited to:

- reviewing and assessing the quality of your main scheme and AVC data and putting in adequate controls for continuous improvement
- having appropriate controls when selecting, appointing and managing service providers
- having risk management processes in place, including processes for monitoring the resolution of issues between the scheme and any relevant third parties
- having processes in place to identify breaches of the law and, if necessary, report them to TPR.

Record keeping

You must also keep:

- clear audit trails of how you took steps to prepare to comply with your dashboard duties including how you made any decisions
- a record of compliance as set out in the reporting standards, and a record of steps taken to resolve any issues that arose, such as communications with third parties
- records of your main scheme and AVC matching policies

- records of the steps taken to improve your main scheme and AVC view data
- records of the steps taken to maintain your data quality once connected.

These records will help provide TPR with a rounded and transparent view of your efforts to comply with legislation, both before and after connection.

TPR expect third parties to help and support you in meeting your duties appropriately. This includes employers providing you with information to enable you to perform your duties.

Record keeping is highlighted in more detail throughout this guide.

Internal controls action

- before connection set up your internal controls register
- after connection, maintain your internal controls register

8. Dashboards available point (DAP)

More information can be found in [PDP's An introduction to the DAP].

The DAP is the point at which the MoneyHelper Pensions Dashboard (MHPD) will made available to the public. This will only happen when several requirements have been reviewed by the Minster for Pensions. These are:

- sufficient coverage
- the service must work effectively
- safety and security
- user experience.

The Secretary of State for Work and Pensions will provide at least six months' notice of the DAP.

MHPD expected launch date

We understand MaPS CEO expects the MHPD to be available to the public in the 2027/28 financial year. PDP will provide an update on launch plans around the time of the 31 October 2026 connection deadline.

9. Timescales for connecting to the ecosystem

More information can be found in:

- DWP Guidance on connection: the staged timetable
- DWP Guidance on deferring connection
- TPR Pensions dashboards: guidance
- PDP Connection hub
- PDWG guidance

'Connection deadline' and 'connect by' date

The Pensions Dashboards Regulations 2022 require all pension schemes in scope to connect to the ecosystem by the 'connection deadline' of 31 October 2026 - unless you can defer your connection.

To avoid undue strain on all parties facilitating connection, DWP has set out a staged timetable for schemes to connect. Schemes are asked to connect over time according to their size and type. The Pensions Dashboards Regulations 2022 require you to have regard to this guidance.

For the LGPS, the 'connect by' date in the guidance is 31 October 2025. TRP has confirmed this means within the month of October 2025. This applies to both your main scheme benefits and your AVC arrangement(s). Both arrangements must connect at the same time – even where your AVC provider(s) has a different connection date.

From the point you connect you must be able and remain able, to:

- meet the required standards (connection, security and technical)
- be able to respond to find requests, complete matching and provide view data comprising of administrative data, value data and contextual information on request, to members accessing dashboards – see section 16 for more information
- provide operational information upon request and in accordance with the reporting standards – see section 18 for more information.

Having regard to DWP's connection guidance: the staged timetable

Although DWP's guidance on connection is not mandatory, the law requires you to have regard to it when making decisions about connection. You must also be able to demonstrate you have done so. Failure to demonstrate you have had regard to this guidance may result in enforcement action by TPR.

When demonstrating you have had regard to DWP's guidance on connection: the staged timetable, you must be able to demonstrate you:

- have engaged with the guidance before making final decisions about connection
- have adequate governance and processes in place for making connection decisions. The reasoning for connection decisions should be clearly considered and documented. Risks should be clearly identified, evaluated, managed and documented.
- have access to all relevant information before making connection decisions and acting upon those decisions. You will need to keep clear and accurate audit trails to demonstrate the decisions made, reasons for them and actions taken.

DWP encourage you to follow the dates in their guidance unless there are 'exceptional circumstances' which prevent you from doing so.

TPR expects you to follow the 'connect by' dates in DWP's guidance on connection. It does not consider implementing the McCloud remedy as an 'exceptional circumstance'. This is because the impact of the McCloud remedy was considered when setting the 'connect by' date of 31 October 2025 for all public service pension schemes. Had this not been the case, due to the number of in scope members, public service pension schemes would have been expected to 'connect by' 31 May 2025.

Connection action

- before connection make sure you and your relevant stakeholders know your 'connection deadline' of 31 October 2026 and your 'connect by' date of 31 October 2025.

Deferring your 'connection deadline' date

The date for applying to defer your connection deadline beyond 31 October 2026 was 9 August 2024.

If you applied for deferral and it was approved, the latest date your connection deadline can be extended to is 31 October 2027. You must connect to the ecosystem by your new connection deadline. You should let all your relevant stakeholders (eg your pensions committee, local pension board, ISP, AVC providers) know this new date. See section 12 for more information about ISPs.

If deferral was refused, you must connect by the 'connection deadline' of 31 October 2026.

'Connection deadline' action

- before connection and after confirmation of deferral is obtained inform all your relevant stakeholders of your new 'connection deadline' date.

Record keeping action

- before connection and after confirmation of deferral is obtained you must keep a record of why you decided to change it, the parties you communicated with in making your decision and the date you obtained approval.

Changing your 'connect by' date

DWP's connection guidance confirms the 'connect by' date for the LGPS is 31 October 2025. This means you should connect within the month of October 2025. DWP encourages you to follow the dates in their guidance unless there are 'exceptional circumstances' which prevent you from doing so. TPR does not consider implementing the McCloud remedy as an 'exceptional circumstance'.

If you are considering connecting at a different time, either earlier or later, you should follow the process below.

There is no legal requirement to make a formal application to defer or bring forward your 'connect by' date, provided you meet the 'connection deadline' of 31 October 2026. This is because your 'connect by' date is set out in guidance and not legislation. However, there are actions TPR expect you to take.

You must have regard to the 'connect by' date in guidance and be able to demonstrate this. See 'Having regard to DWP's connection guidance' for more information about what this means. This will include clearly documenting the reasons for deciding to change your connection date, any risks associated, and relevant mitigation actions.

You should discuss your proposed changes with your ISP to develop a practical delivery plan to support the changes. Adequate governance and controls should also be in place, to ensure the connection work is progressing as planned.

Thereafter, you will need to follow PDP's guidance titled 'Change connection plans'.

If you miss the 'connection deadline' of 31 October 2026 this may result in enforcement action by TPR.

'Connect by' action

- if you are considering changing your 'connect by' date, follow PDP's guidance
- upon receipt of confirmation from PDP your 'connect by' date has been changed inform all relevant stakeholders of your new date.

Record keeping action

- upon receipt of confirmation from PDP your 'connect by' date has changed keep a record of why you changed your 'connect by' date, the parties you communicated with in arriving at this decision and the date of the decision
- upon receipt of confirmation from PDP your 'connect by' date has changed keep a record of your communication with PDP informing those parties of why you have changed your 'connect by' date
- upon receipt of confirmation from PDP your 'connect by' date has changed keep a record of your new 'connect by' date.

10. Registering with MaPS

More information can be found in:

- TPR Pensions dashboards: guidance
- PDP Connection hub

As part of connecting to the ecosystem you must register with the MaPS governance register. The governance register works to make sure the ecosystem is kept safe and the security and performance standards are met. If you are using an ISP to help you connect, your ISP will handle registration on your behalf.

You will need to use your Pension Scheme Reference (PSR) number and a registration code that is unique to your scheme to register with MaPS. TPR will supply you with two unique registration codes, via their scheduled communications. This will be around three to five months in advance of your 'connect-by' date. The registration code will expire shortly after your 'connect-by' date. You are responsible for providing this code to your ISP who will be connecting on your behalf. It is important that the codes you are issued are kept safe.

If you require more codes (for example, if you are using more than two ISPs), or if you are planning to connect earlier than your ‘connect by’ date, contact TPR.

Connection action

- register with the MaPS governance register by way of PDP online by the date specified in PDP’s connection hub.

11. Budget

There are two aspects to your budget to consider. A connection budget and an ongoing business as usual (BAU) budget.

Throughout this section we refer to an integrated service provider (ISP). See section 12 for more information about ISPs.

Connection budget

The connection budget includes your operational and system start-up costs, to connect to the ecosystem. For example, though not limited to:

- resource for: reconciling AVC data to your main scheme records, loading AVC data where you adopt the single source approach, ensuring all your data (including AVC data) is accurate and digitally accessible, adjusting processes, internal controls, record keeping, developing policies, testing and working with third parties
- appointing an ISP, adjusting workflows, creating specialised reports to satisfy reporting requirements and testing.

You also need to keep a record of how you decided your connection budget and the parties you communicated with in doing so.

Budget action

- before connection decide your connection budget and obtain approval from the appropriate party.

Record keeping action

- before connection keep a record of how you decided your connection budget and the parties you communicated with in doing so.

Business as usual (BAU) budget

Your BAU budget takes into account your operational and system costs for maintaining connection to the ecosystem. For example:

- resource for: maintaining data cleansing, maintaining AVC reconciliation, maintaining AVC data where you adopt the single source approach, record keeping, internal controls, reporting, keeping policies up to date, converting possible matches, responding to information requests from third parties (including members, TPR and MaPS) and working with third parties eg your pensions administration software provider and AVC provider(s)
- maintenance and support of your ISP, workflows, production of automatic reports for various third parties – TPR and MaPS.

Much of the above will not be realised until closer to the dashboards available point (DAP).

You also need to keep a record of how you decided your BAU budget and the parties you communicated with in doing so.

Budget action

- at the same time as when you seek approval for your connection budget consider what your BAU budget might be and inform the party responsible for approving your budget
- six months before the DAP seek approval for your BAU budget.

Record keeping action

- at the same time as when you seek approval for your connection budget keep a record of how you decided your BAU budget and the parties you communicated with in doing so.

12. How to connect to the ecosystem

More information can be found in:

- TPR Pensions dashboards: guidance
- PDP Connection hub
- PDWG guidance
- National LGPS frameworks

- LGPS AVCs and Dashboards administrator guide – [Administrator guides and documents](#) page on [www.lgpsregs.org](#) and [Administrator guides and documents](#) page on [www.scotlgpsregs.org](#)

You must connect to ecosystem within the timescales set out in section 9.

You need to decide how you are going to connect to the ecosystem.

You can connect directly, or via a third party - an integrated service provider (ISP).

Whichever approach you take, you remain responsible for ensuring you are connected to the ecosystem on time and that your connections remain compliant. You should ensure robust processes are in place for the selection, appointment, management and replacement of any suppliers.

You are also responsible for making sure your AVC provider(s):

- are connected to the ecosystem at the same time as you, and that their connection remains compliant, or
- send your AVC view data to you to send to the ecosystem.

See our LGPS AVCs and Dashboards administrator guide for more information.

Connecting directly

Connecting directly to the ecosystem will be a significant undertaking. Typically requiring specialist resource and experience to meet the technical standards and requirements outlined in the code of connection. It is likely to require improvements to your IT and network infrastructure.

We understand you are unlikely to connect to the ecosystem directly. Therefore, this guide only looks at connecting to the ecosystem by way of an ISP.

Connecting using an Integrated Service Provider (ISP)

If you choose an ISP, the provider will create its own connections with the ecosystem and plug you in alongside other clients.

You need to decide who you will appoint to provide your ISP.

Procuring an ISP

In April 2024, the National LGPS Frameworks for ISPs and Member Data Services went live.

The Member Data Services Procurement Framework has been expanded to support you as you prepare for the introduction of the Pensions Dashboards. ISPs and a wide variety of member data services can now all be procured via this Framework.

If you are interested in using one of the National LGPS Frameworks or would just like to find out more, please email nationalLGPSFrameworks@norfolk.gov.uk or visit their website www.nationallgpsframeworks.org.

Once appointed, you need to talk to your chosen ISP as soon as possible to understand:

- the implementation process, timescales and maintaining connection
- what resource you will need to support implementation and once dashboards are live.

PDPs guidance on connecting to the ecosystem sets out lots more considerations.

Once you have chosen your ISP you need to make sure your supplier is on track to connect to the ecosystem and supply your data to the ecosystem, by your 'connect by' date – see section 9 for more information about connection timescales.

You also need to keep a record of how you chose your ISP and the parties you communicated with in doing so.

Connection action

- before connection decide your route to connection – either directly or using an ISP
- before connection choose your ISP
- before connection enter negotiations and contractually engage your ISP.

Internal controls action

- before connection make sure your ISP is on track to connect you to dashboards by your connection date and in accordance with your staging timeline.
- after connection, make sure your ISP maintains your connection to the ecosystem.

Record keeping action

- before connection keep a record of how you decided your route to connection
- before connection keep a record of how you chose your ISP and the parties you communicated with in doing so

- before connection keep a record of how you decided what resource you will need and the parties you communicated with in doing so
- after connection keep a record of the evidence supplied by your ISP to demonstrate that your connection to the ecosystem is maintained.

13. Authorisation and identification

This section is for information only to explain what happens before you receive data from the pensions finder service.

More information can be found in PDP consumer protection page.

When a user logs onto a dashboard of their choosing, the Consent and Authorisation service interacts with the Identity service to authenticate the user.

The Consent and Authorisation service initiates user authentication and manages user consents and permissions. It also allows users to give and manage delegated access to view their pensions information via dashboards to others, such as financial advisers and MaPS guidance specialists.

The Identity service allows users to prove they are who they say they are, so that they can access other elements of the ecosystem. It provides the verification to assure you that you are returning data to the correct user and no one else.

Only after the user's consent is authorised and their identity authenticated, will you receive personal data and contact information from the pensions finder service.

PDP has provided an introduction to find and view data video that explains how this works.

14. Matching criteria

More information can be found in:

- TPR Pensions dashboards: guidance
- TPR Pensions dashboards compliance and enforcement policy
- PDP Data standards
- PDP Consumer protection
- PDWG guidance
- LGPS AVCs and Dashboards administrator guide – Administrator guides and documents page on www.lgpsregs.org and Administrator guides and documents page on www.scotlgpsregs.org

Once a user's identity is authenticated and they have provided their consent, their data will be securely sent to every pension scheme connected to the ecosystem, including the LGPS, to check if there is a match. This is done by the pensions finder service using an identity service.

You need to understand what personal data and contact information you will receive from the pensions finder service to help you decide what data you will use to match members to their pension records – this is called 'find data'. Paragraphs 31 to 34 of PDP data standards sets out what information you can expect to receive in a find request. Speak to your ISP for more information about find data.

You should have regard to the PDP's data standard guidance, TPR's compliance and enforcement policy and the PDWG matching guidance when making your decision. You may also find it helpful to discuss your matching criteria with your ISP. They may be able to provide tools to help you assess the quality of your data, which in turn, will help you decide on your matching criteria.

If you have agreed with your AVC provider for them to send your AVC view data directly to dashboards on your behalf, you should establish a consistent approach to matching.

Terminology around matching reflected the terms used in the Pension Dashboard Regulations 2022 – namely, positive match, match made, possible match and no match. On 5 March 2026, PDP confirmed what industry can expect to see displayed on the MHPD following user research. These new terms are reflected in this guide:

- **Confirmed pensions (formerly 'match made')** - these are those where a successful match has been made and the administering authority is able to supply all the view data immediately.
- **Pending pensions** - a pension shows as pending when it is been matched to the user, but the administering authority has not yet supplied all the required information. The user does not need to do anything, once the data arrives the pension automatically becomes confirmed. Authorities will usually send the missing information within 10 working days.
- **Pensions that need action (formerly 'possible match')** - pensions appear in "needs action" when either a possible match needs extra information, or the administering authority requires the user to contact them before sharing pension details. This is the only category where the user may need to act. They can try adding their national insurance number, and if that does not help, they must contact the authority using the details shown. A scam warning reminds users that they should make the first contact. Authorities must resolve these cases promptly and may see increased enquiries.

You need to decide on your matching criteria for a:

- confirmed pension
- pension that needs action.

You need to make sure the personal data you decide to use for matching is accurate and digitally accessible. Assessing the quality of your data is an integral part of the pensions dashboard project.

If necessary, you may need to put a data improvement plan in place to improve the accuracy and digital accessibility of your data. You will need to regularly review your plan to make sure improvements have taken place. You will also need to ensure you have a process in place to maintain the accuracy of the personal data used for matching, once dashboards are live.

Once you have decided what find data you will use to form your matching criteria, you must keep a record of this for at least six years from the end of the scheme year in which you make that decision.

You can change your matching criteria at any time. In fact, it will be good practice to keep it under review, particularly once a better understanding of user behaviour is obtained. You may also want to review your matching criteria if you have implemented a data improvement plan. Accurate data will allow you have a simpler matching convention.

You will also need to keep a record of how you decided upon your matching criteria and the parties you communicated with in doing so and update your Data Protection Impact Assessment (DPIA).

Policy decision

- before connection decide what personal data you will use to form your matching criteria for both your main scheme and AVCs
- after connection keep your matching policy under review.

Record keeping action

- before and after connection keep a record of your matching criteria for at least six years from the end of the scheme year in which you make that decision
- before and after connection keep a record of how you decided upon your matching criteria and the parties you communicated with in doing.

Governance action

- before connection produce or update your DPIA to take account of your matching criteria policy decision
- after connection update your DPIA where your matching policy changes.

Internal controls action

- before connection assess the quality of the data you plan to use in your matching criteria – is it accurate and digitally accessible?
- before connection create a data improvement plan if necessary
- regularly review your plan to make sure improvements have taken place
- after connection put a plan in place to maintain the accuracy and accessibility of the personal data used to form your matching criteria – main scheme and AVCs.

15. Providing information to the ecosystem

More information can be found in:

- TPR Pensions dashboards: guidance
- PDP Data standards
- PDWG guidance
- LGPS AVCs and Dashboards administrator guide – Administrator guides and documents page on www.lgpsregs.org and Administrator guides and documents page on www.scotlgpsregs.org

The data you provide to members when a match is made is called view data. View data is made up of administrative data, signpost data, value data and contextual information. These are explained in section 16. This section is about process, accuracy and digital accessibility of all view data.

Main scheme

Following a successful find request, you must return view data to your member's choice of dashboard within the legal timescales. The timescales are explained in section 17.

If a find request results in a 'pension that needs action' response, you must return limited administrative data within the legal timescales.

Although your ISP will retrieve view data from your pensions administration software system, you need to understand what view data you will need to return to members who access dashboards and in what timescale. This will help you determine if your view data is accurate and digitally accessible. See section 16 for more information.

Data action

- before connection understand what view data you need to return for members who access dashboards and in what timescale.

Additional voluntary contributions (AVCs)

There are three methods by which you can send your AVC view data to the ecosystem, these are set out in our AVCs and Dashboards administrator guide, including the pros and cons of the different approaches.

However you decide to send your AVC view data to the ecosystem, you remain responsible for the accuracy and provision of AVC view data before and after connection. You should discuss with your AVC provider(s) how best to send your AVC view data to the ecosystem. Our AVCs and Dashboards administrator guide includes a list of due diligence questions, to help you with this. To support these discussions and help ensure compliance, we have developed a template Memorandum of Understanding (MOU). The MOU is designed to work with both the multiple source approach and single source approach.

While the MOU is not legally binding, it serves as a practical framework for both parties to clarify how they will meet dashboard and data protection requirements, whether using a single or multiple-source approach. You may later decide to formalise these arrangements through legally binding contracts, for which you should seek your own legal advice. This template MOU and accompanying notes were developed with reference to the law in England and Wales. While the Pensions Dashboards Regulations 2022 and Data Protection laws apply across the UK, Scottish Administering Authorities may wish to seek their own legal advice to confirm applicability and make any necessary adjustments to references within the documents.

You can find the template MOU and explanatory notes on the following web pages, use the subject filter to view all Pensions Dashboards resources on the Administrator guides and documents page on www.lgpsregs.org and Administrator guides and documents page on www.scotlgpsregs.org.

Policy decision

- before connection agree with your AVC provider(s) how your AVC view data will be sent to the ecosystem

- after connection consider using the template MOU to clarify how your AVC provider(s) will meet their dashboard and data protection duties, whether using a single or multiple-source approach – implement accordingly.

Internal controls actions

Action – multiple source

- before connection monitor your AVC provider(s) progress in complying with the requirements to connect to the ecosystem by your 'connect by' date.

Action – single source

- before connection confirm you can store your AVC view data in a digitally accessible mode
- before connection agree the method your AVC provider(s) will use to securely send your view data and the frequency.

16. The data you must provide to the ecosystem

More information can be found in:

- TPR Pensions dashboards: guidance
- TPR Assess whether to report a breach of the law
- PDP Data standards
- Actuarial Standard Technical Memorandum
- PDWG guidance
- LGPS AVCs and Dashboards administrator guide – Administrator guides and documents page on www.lgpsregs.org and Administrator guides and documents page on www.scotlgpsregs.org

See appendix three 'Regulatory queries' for more information on the queries we have raised, and the answers received from DWP and MaPS.

The information you must provide to members via dashboards is called view data. View data is made of up of:

- administrative data
- signpost data
- value data
- contextual information.

The timescales for providing this data are explained in section 17. This section is about what information must be included in the different types of view data.

Relevant member

Only members who are relevant members will see their view data displayed on the MHPD. We understand a relevant member is:

- an active member, including any connected AVCs
- a deferred member, including any connected AVCs
- a suspended tier three pensioner member, including any connected suspended AVCs
- a pension credit member, including any connected AVCs
- an orphan AVC member where the connected main scheme benefits have been transferred out of the LGPS
- an orphan AVC member where the connected main scheme benefits have not been brought into payment.

A relevant member does not include:

- an active member where the member has previously taken flexible retirement and received payment of all or part of their benefits whilst remaining in the same employment, including any connected AVCs
- a suspended pensioner member where the pension payments are suspended due to abatement.
- a pensioner member, including any connected AVCs paid or unpaid
- a deferred refund member, including any connected AVCs
- a survivor member
- an orphan AVC member where the connected main scheme benefits have been brought into payment.

'Connected' means the main scheme benefits built up in the employment where the active member made an election to pay AVCs or contribute to SCAVCs.

Administrative data

Administrative data must be provided where a match is made. Timescales are set out in section 17.

Administrative data is broken down into three subcategories:

Pension arrangement data

Information about the pension arrangement the individual has a pension with, or a right to claim a benefit from.

Administrator data

Information about the organisation the individual should get in touch with to find out more about their pension benefits.

Where the single source approach is used to send AVC view data to the ecosystem, you will need to consider to which organisation the member should get in touch with to do this ie the AVC provider or the administering authority.

Employer data where available

Information about the employment(s) that gave rise to the pension.

If the pensionable service relates to more than one employer you can choose to name up to 10 employers or simply confirm there are multiple employers within the same record.

Policy decisions

- before connection decide whether to name the most recent employers (maximum 10) or confirm if there are multiple employers and inform your ISP – applicable to main scheme benefits and AVCs
- before connection, where the single source approach is used, agree with your AVC provider(s) who the member should contact to find out more about their AVC benefits and inform your ISP of the decision.

Limited administrative data

Limited administrative data must be provided where there is a pensions that need action result. It must be provided immediately.

It is broken down into two subcategories:

Pension arrangement data

Name of the pension arrangement the individual may have a pension with, or a right to claim a benefit from.

Administrator data

Information about the organisation the individual should get in touch with to find out more about their pension.

As mentioned in ‘Administrative data’, where the single source approach is used to send AVC view data to the ecosystem, you will need to consider which organisation the member should get in touch with to find out more about their pension benefits.

Signpost data

In our view, the duty to provide signpost data does not apply to LGPS administering authorities. We understand that some authorities have indicated they are planning to provide links to their annual report and investment strategy statement; however, this is not required by the legislation.

Value data – main scheme benefits

Value data must be provided where there is a confirmed pension. Timescales are set out in section 17.

Value data is information about the value of the member’s main scheme pension benefits – ie CARE pension, final salary pension / 3/80th lump sum, additional pension, added years etc. It does not include the value of any survivor benefits.

Value data is taken from either:

- an annual benefit statement (ABS) provided to the member within the last 13 months. If the values in the statement are from a calculation performed beyond the last 12 months see - TPR Example of green breaches, or
- a calculation performed for the member within the last 12 months, whether the calculation was done in response to an earlier view request.

Value data represents the value of the member’s pension benefits calculated without regard to possible increases in earnings:

- on the illustration date - calculated as if the member had reached their normal pension age, and
- for active members only, projected to the member’s normal pension age.

McCloud and value data

How the McCloud remedy is reflected in ABS is not prescribed. The method you use to include the McCloud remedy in ABS should be consistent with the view data you provide to the ecosystem.

Value data decisions

Regulations and guidance are silent on several areas concerning how to calculate and present value data. For example – whether to include actuarial increases where a member has passed their normal pension age. As a result, you will need to make some decisions and document the reasons why.

PDWG has produced Values guidance to help you make those decisions. The table in appendix two has a checklist for you to complete.

Data action

- before connection complete the values data check list in appendix two.

Value data – AVCs

AVC value data is information about the value of the member's AVC pot.

Value data is derived from either a:

- statement provided to the member within the last 13 months. If the values in the statement are from a calculation performed beyond the last 12 months see - TPR Example of green breaches, or
- a calculation performed for the member within the last 12 months, whether the calculation was done in response to an earlier view request.

AVC value data is:

- an annualised accrued value – ie an annuity, calculated as if the individual had reached their retirement date on the illustration date,
- if held, a projected pot value to normal pension age, and
- an annualised projected value to normal pension age.

These values are calculated using the latest version of the Actuarial Standard Technical Memorandum (AS TM1) produced by the Financial Reporting Council (FRC), in the calculation of statutory money purchase illustrations (SMPIs).

The AVC payable date can be different to the main scheme benefits. PDP has advised it is for each scheme to decide these dates based on the scheme's structure and design. In our view the AVC payable date is the member's normal pension age.

Illustration dates

In December 2025, the Department for Work and Pensions (DWP) confirmed its policy intent: illustration dates should align at a **benefit level**.

For supplying value data to the pension dashboards ecosystem, this means:

- the accrued and projected values for a benefit should be calculated on the same day
- the defined benefit (DB) for a member can be calculated on a different day to their defined contribution (DC) benefit, as these are different benefits
- if a member has two separate AVC arrangements they can also be calculated on different dates to each other, as they are different benefits
- if a member has more than one pension account / final salary benefit, they can be calculated on different dates to each other, as they are different benefits. This applies whether the pension accounts / final salary benefits are held with the same or a different administering authority.

TPR will focus its regulatory activities on ensuring that information presented to savers is recent, clear, accurate and understandable. Specifically:

- value data must come from the most recent statement issued within the last 13 months, or from a calculation made within the last 12 months
- accrued and projected values for each benefit must share the same illustration date.

See - [TPR Example of green breaches](#).

Exemptions to providing projected AVC value data

You can decide not to provide AVC projections in certain circumstances. You should discuss this with your AVC provider before deciding on your policy.

You do not have to provide AVC projections where:

- the:
  - value of the member AVC pot on the last illustration date was less than £5,000,
  - since the previous illustration date no contributions have been made to the member's AVC pot, and
  - your AVC provider has given written notice to the member that a pension illustration will not be provided unless further contributions are made, or
- the member is within two years of their normal pension age.

You will need to keep a record of how you reached your decision and the parties you communicated with in doing so.

Data action

- before connection agree the AVC illustration date with your AVC provider(s) and where the single source approach is used inform your ISP
- before connection agree with your AVC provider(s) if you will provide AVC projections where you are not required to do so by law and where the single source approach is used inform your ISP
- before connection agree with your AVC provider(s) your AVC payable dates and where the single source approach is used inform your ISP.

Record keeping action

- from the date of your decision keep a record of how you agreed your AVC illustration date and the parties you communicated with in doing so
- from the date of your decision keep a record of how you agreed whether to provide AVC projections and the parties you communicated with in doing so
- from the date of your decision keep a record of how you agreed the AVC payable date and the parties you communicated with in doing so.

Contextual information

At the same time as providing value data you must also provide contextual information. This is information to help the individual better understand their value data. Such as the date payable from, does it contain any safeguarded benefits, should the individual get in touch with you regarding the information displayed together with the reason why. More information can be found in PDP's data standards.

17. Timings to providing information to the ecosystem

More information can be found in:

- TPR Pensions dashboards: guidance
- TPR Pensions dashboards compliance and enforcement policy
- PDP Data standards
- PDP Understanding the three pension status categories

This section sets out the timings for providing view data following a 'confirmed pension' result or a 'pensions that need action' result.

The timescales in this section apply equally to AVC value data regardless of the method by which the data is sent to the ecosystem – multiple or single source.

Appendix three ‘Regulatory queries’ contains information about queries we have raised with DWP and MaPS.

Overview

The LGPS regulations require you to send annual benefits statements (ABS) in respect of main scheme benefits by 31 August each year.

The Occupational Pension Schemes (Disclosure of Information) Regulations 2013 require AVC providers to issue statutory money purchase illustration (SMPI) statements to your AVC members within 12 months of the end of the scheme year. This is subject to certain regulatory exclusions; your AVC provider(s) will be able to let you know more.

Section 16 of this guide sets out that view data includes value data, and what data items value data includes. Value data is essentially the values quoted in the ABS and AVC SMPI statement, including estimated retirement income (ERI). Where members receive an ABS, and where applicable an AVC SMPI statement, containing value data this is the data that should be supplied to the ecosystem. You can decide not to provide ERI for AVCs in limited circumstances, but you must supply ERI to eligible members – see section 16 for more information.

If for some reason the member is not sent an ABS and / or where appropriate an AVC SMPI statement, you will need to create a process to calculate the missing value data and provide it to the ecosystem within the statutory timescales set out later in this section. This includes missing AVC SMPI value data, where the single source approach is adopted. If you have not already done so you will need to consider introducing monthly data contributions (MDC) to achieve the timescales set out in this section.

If multiple source approach is adopted, you will need to make sure your AVC provider(s) also creates a process to calculate any missing AVC value data and provide it to the ecosystem within the statutory timescales.

We understand a view request applies at benefit level. For example: if the member has more than one pensionable record, they would be treated as an active member in one record and a deferred member in another record. View data for both records are returned to the ecosystem separately. Whilst your main scheme value data should be linked to an employment, you will need to make sure your AVC value data is also linked to the connected employment.

Data action

- before connection check your pension administration software system can send main scheme value data within the timescales set out later in this section
- before connection consider introducing monthly data contributions (MDC) for all employers to achieve the timescales set out in this section
- AVCs – check your AVC provider(s) can facilitate the approach you adopt ie single or multiple source, and provide data within the timescales set out later in this section
- before connection where any value data is out of date or you do not have value data stored:

  - decide how you are going to calculate main scheme value data when providing the data to the ecosystem within the timescales set out later in this section
  - AVCs – agree with your AVC provider(s) how they are going to calculate AVC value data and how they will provide that data to you (single source) or direct to the ecosystem (multiple source)

Record keeping action

- from the date of your decision keep a record of how you decided / agreed to calculate main scheme and AVC value data, including where it is out of date or not present, and the parties you communicated with in doing so.

Confirmed pension

Administrative data

You must return administrative data immediately after a view request is received.

If a member requests view data within three months of joining the LGPS, you will need to provide the administrative data as soon as you can, and no later than three months after the member joined the LGPS.

Value data and contextual information

You must return value data and contextual information immediately where the value data is generated from:

- an ABS, and where appropriate an AVC SMPI, if it is based on a statement provided to the member within the last 13 months. If the values in the statement are from a calculation performed beyond the last 12 months see - [TPR Example of green breaches](), or

- a calculation performed for the member within the last 12 months, whether the calculation was done in response to an earlier view request.

Where the above does not apply, you must return value data for main scheme and AVC benefits within 10 working days.

For new members, you are required to provide the value data as soon as you can. This should be no later than when you first produce a statement of the members' benefits for them, or 12 months from the end of the first full scheme year they have been in the scheme, whichever is soonest.

Once you have provided an ABS to a member, they are no longer classed as a new member for dashboards purposes.

Examples

Example 1 – member accesses a dashboard within three months of joining the LGPS and before receiving their first ABS

On 1 November 2026, you receive a view request from a member who joined the LGPS on 1 September 2026.

The member has not received an ABS since joining the LGPS.

You must provide:

- administrative data by 30 November 2026 – ie within three months of joining the LGPS
- value data and contextual information as soon as possible and no later than the date you provide the member with their first ABS – in this example by 31 August 2027.

Example 2 – member accesses a dashboard nine months after joining the LGPS and before receiving their first ABS

On 1 June 2027 you receive a view request from a member who joined the LGPS on 1 September 2026.

The member has not received an ABS since joining the LGPS.

You must provide:

- administrative data immediately because they joined the LGPS more than three months ago

- value data and contextual information as soon as possible and no later than the date you provide the member with their first ABS – in this example by 31 August 2027.

Example 3 – member accesses a dashboard 21 months after joining the LGPS and has not received their first ABS

On 1 June 2027 you receive a view request from a member who joined the LGPS on 1 September 2025.

The member should have received an ABS by 31 August 2026, but this was not provided.

You must provide:

- administrative data immediately because they joined the LGPS more than three months ago
- value data and contextual information immediately if you have provided the member with a calculation within the last 12 months eg in response to an earlier view request, or within 10 days if no such calculation has been provided.

Technically the regulations require that you provide value data and contextual information no later than 31 March 2027 ie 12 months from the end of the full scheme year. However, as this is before the member requests their view data, the timescales above should be followed.

Example 4 – member accesses a dashboard nine months after joining the LGPS and has received their first ABS

On 1 June 2027, you receive a view request from a member who joined the LGPS on 1 September 2025.

The member received their first ABS on 31 August 2026.

You must provide:

- administrative data immediately because they joined the LGPS more than three months ago
- value data and contextual information immediately. The value data can be based on the ABS provided to the member on 31 August 2026, as it was provided in the 13 months before the view request.

Example 5 – member accesses a dashboard 33 months after joining the LGPS and has not been provided with an ABS in the last 13 months

On 1 August 2027, you receive a view request from a member who joined the LGPS on 1 September 2025.

The member received their first ABS on 31 May 2026. They have not received their ABS due by 31 August 2027.

You must provide:

- administrative data because they joined the LGPS more than three months ago
- value data and contextual information immediately if you have provided the member with a calculation within the last 12 months eg in response to an earlier view request, or within 10 days if no such calculation has been provided.

Pension that needs action

Following a 'pension that needs action' result you must immediately return limited administrative data.

If this result turns into a 'confirmed pension', the timescales set out in the section titled Confirmed pension apply from the date the pension is confirmed.

18. Operational information and reporting

More information can be found in:

- PDP Reporting standards
- PDWG guidance

You must provide operational information to MaPS, TPR and FCA upon request. This is provided in accordance with the reporting standards.

The reporting standards set out the requirements you must meet for generating, recording and reporting data.

Operational information means information relevant to the operation of dashboards, including monitoring compliance and supporting TPR's functions.

You must keep this information for at least six years from the end of the scheme year to which it relates. The type of information we expect operational information to cover is:

- number of find requests you receive
- your matching process
- number of matches made you notify to MaPS
- how quickly you resolve any pensions that need action results
- number of pensions that need action results that realise into a confirmed pension result or no confirmed pension result and remain unresolved
- number of view requests you receive, and the time taken to respond to each one
- how many contacts you receive from users including details of:

  - queries about the pensions information you provide
  - pensions not found following a search
  - complaints
- any aspects of processing a user's request for pensions information.

We understand most of the operational information will be captured by the ecosystem or automatically provided to the ecosystem by your ISP. It will be captured / sent on an hourly / daily basis as prescribed within the standards.

You may still need to report on things outside the system, such as complaints or pensions that need action but aren't recorded. You could also be asked to show how member dashboards are affecting activity, for example increases in website visits, estimate requests, requests for additional pension, or transfers out.

One way to do this is to create a dedicated landing page. Members would be taken to this page after clicking your website link from the dashboard. From there, they could choose to explore your website, request an estimate, investigate buying extra pension, or review the transfer-out process. Having a separate landing page will help you track this activity.

You could also add a simple step in your processes to record why the member got in touch, for example noting that they came via the dashboard.

You should discuss the operational information requirements with your ISP, your pensions software provider and your website provider. You need to understand where you will have to create separate processes to provide the operational information upon request.

We recommend you start considering the following operational information requirements before and after connection.

Governance action

- before connection and after connection understand the operational information requirements and your ongoing responsibilities
- before connection and after connection discuss the operational information requirements with your ISP
- before connection and after connection create and maintain separate processes to provide operational information that lies outside of the ecosystem.

Record keeping action

- before and after connection keep a record of the operational information for at least six years from the end of the scheme year to which it relates
- before and after connection you must keep clear audit trails of the steps you took steps to comply with your pensions dashboards duties
- before and after connection you must keep a record of steps taken to resolve any issues that arise, such as communications with third parties
- before and after connection you must keep a record of compliance as set out in MaPS reporting standards.

Internal controls action

- before and after connection you must have risk management processes in place, including processes for monitoring the resolution of issues between the scheme and any relevant third parties
- before and after connection create and maintain a plan to record the operational information
- before and after connection regularly review your plan to make sure the operational information is recorded and maintained.

19. Compliance and enforcement

More information can be found in:

- TPR Pensions dashboards compliance and enforcement policy
- TPR Assess whether to report a breach of the law
- PDP Consumer protection

The Pension Dashboard Regulations 2022 – 'the Regulations', sets out your pensions dashboards responsibilities. This section outlines those responsibilities and provides links to more detailed online information.

The Regulations include compliance and enforcement powers. These provide TPR with the power to pursue administering authorities, where they believe there has been a breach of the regulations. The regulations also include powers for TPR to pursue third parties, such as employers, third party administrators and third party ISPs, where TPR believe it is those parties that have caused you to be in breach of the regulations.

TPR will use multiple sources of evidence to monitor and identify non-compliance. They will receive information from MaPS captured through the ecosystem and sent by you directly. The data will help them identify breaches and look at trends across the landscape. They might also request additional information from you where they identify concerns, or they are looking to identify best practice.

TPR compliance and enforcement policy

TPR sets out its expectations, as well as providing clarity on its approach to enforcement, in its compliance and enforcement policy.

You may wish to pay particular attention to the list of illustrative scenarios of what might happen if you:

- miss your connection deadline
- having connected you fail to maintain connection
- you fail to match savers to their pensions
- you fail to return value data.

TPR's compliance and enforcement policy does not apply to FCA regulated pension providers. There are separate rules for those bodies.

TPR assess whether to report a breach of the law guidance

In addition to publishing their compliance and enforcement policy, TPR has also updated its Assess whether to report a breach of the law guidance.

This guidance sets out when breaches of the law must be reported to TPR if you have reasonable cause to believe:

- a legal duty which is relevant to the administration of the LGPS has not been, or is not being, complied with
- the failure to comply is likely to be of material significance to TPR in the exercise of any of their functions.

The guidance sets out examples of breaches, provides you with a framework to make decision to report to TPR based on the significance of the beach. The framework adopts a traffic light approach:

- **red breach** situations must be reported as they are always of material significance to TPR
- **amber breach** situations may need to be reported to TPR as they are less clear cut and must be considered in the context of the breach as to whether they are of material significance
- **green breach** situations do not have to be reported to TPR if they are not of material significance.

The guidance also sets out what steps to follow if you identify a breach.

Internal controls

- after connection have processes in place to monitor compliance and report breaches
- after connection regularly review the implementation of connecting to the ecosystem and determine if any breaches have occurred – report any breaches to TPR if necessary
- after connection once connected to the ecosystem regularly review your connection to make sure you can find savers and return data as expected – report any breaches to TPR if necessary.

20. TPR programme of nudge communications

TPR restarted its programme of nudge communications to in scope schemes in 2025.

You should have received a series five emails in the run up to your ‘connect by’ date of 31 October 2025. For public service pension schemes the emails commenced in July 2024. You can nominate further contacts from the link sent in your first nudge email.

The nudge emails contained key messages about where TPR expect you to be in the dashboards implementation process.

In November 2024 you should have received your first dashboards readiness survey from TPR. The survey covered nine key areas including awareness of duties, preparation for connection, data preparation, compliance and engagement. All responses were kept anonymous. Responses enabled TPR to create a picture of the dashboards implementation progress across the public sector.

21. Appendix one – before and after connection checklist

We have provided a compilation of the actions, record keeping requirements and timings set out in this guide. The list may be impacted by your local approach.

The tasks within the checklist are grouped in the same way as the guide. There are six topics to help you identify the different areas of implementation:

1. Governance
2. Internal controls
3. Connection
4. Record keeping
5. Budget
6. Data

Table 1 - checklist

Topic	Connection tasks	Due date	More information
Governance	Sign up for dashboard on-line news alerts	Before and after connection	Section 4
Governance	Keep up to date with the latest information and developments	Before and after connection	Section 4
Governance	Discuss dashboards with your relevant stakeholders and establish if they are up to date with the latest information and developments	Before and after connection	Section 4
Governance	Make sure pensions dashboards are a standing agenda item at your Pensions Committee and Local Pension Board meetings	Before and after connection	Section 5
Governance	Make sure you keep your Pensions Committee and Local Pension Board up to date with the latest guidance and developments both industry wide and at your administering authority	Before and after connection	Section 5
Governance action	Decide how your main scheme data will be cleansed and made digitally accessible and remain so after connection	Before and after connection	Section 6
Governance action	Agree with your AVC provider(s) how your AVC value data will be cleansed, made digitally accessible and reconciled to your main scheme records and remain so after connection	Before and after connection	Section 6

Topic	Connection tasks	Due date	More information
Internal controls	Incorporate dashboards data requirements into your wider data management plan including your approach to cleansing, digital accessibility and reconciling your AVC data	Before and after connection	Sections 6 & 7
Internal controls	Regularly review your wider data management plan(s) to determine where you are at	Before connection	Sections 6 & 7
Internal controls	Make sure you have a process in place to maintain the reconciliation with your main scheme records, accuracy and digital accessibility of your main scheme and AVC view data	After connection	Sections 6 & 7
Internal controls	Set up your internal controls register to implement dashboards and maintain your register after connection	Before connection	Section 7
Connection	Make sure you and your relevant stakeholders know the ‘connection deadline’ and your ‘connect by’ dates	Before connection	Section 9
Connection	If approval to defer connection is obtained let all your relevant stakeholders know your new connection deadline	Before connection and after confirmation of deferral is obtained	Section 9
Record keeping	If your connection deadline is changed, keep a record of why you decided to change it, the parties you communicated with in making your decision and the date you obtained approval	Before connection and after confirmation of deferral is obtained	Sections 7 & 9

Topic	Connection tasks	Due date	More information
Connection	Discuss changing your ‘connect by’ date with your ISP and relevant stakeholders	Before connection	Section 9
Connection	Create a new connection plan and inform PDP that you wish to change your ‘connect by’ date	Before connection	Section 9
Connection	Obtain a new ‘connect by’ date from PDP and inform all your relevant stakeholders	Upon receipt of confirmation from PDP	Section 9
Record keeping	Keep a record of why you changed your ‘connect by’ date, the parties you communicated with in arriving at this decision and the date the decision was made	Upon receipt of confirmation from PDP	Section 9
Record keeping	Keep a record of your communication with PDP informing them that you have changed your ‘connect by’ date and a record of your new ‘connect by’ date	Upon receipt of confirmation from PDP	Section 9
Connection	Register with the MaPS governance register	By the date specified in PDP connection hub	Section 10
Budget	Decide on your connection budget and obtain approval	Before connection	Sections 7 & 11
Record keeping	Keep a record of how you decided on your connection budget and the parties you communicated with, in making your decision	Before connection	Sections 7 & 11

Topic	Connection tasks	Due date	More information
Budget	Decide on your potential business as usual budget and provide the party responsible for approving advance notice of this cost	Before connection	Sections 7 & 11
Budget	Decide on your business as usual budget and obtain approval	Six months before the DAP	Section 11
Record keeping	Keep a record of how you decided on your business as usual budget and the parties you communicated with, in making your decision	Six months before the DAP	Sections 7 & 11
Connection	Decide your route to connection – either directly or using an ISP	Before connection	Section 12
Record keeping	Keep a record of how you decided on your route to connection and the parties you communicated with, in making your decision	Before connection	Sections 7 & 12
Connection	Choose your ISP and contractual engage them	Before connection	Section 12
Record keeping	Keep a record of how you choose your ISP and the parties you communicated with, in making your decision	Before connection	Sections 7 & 12

Topic	Connection tasks	Due date	More information
Internal controls	Make sure your ISP is on track to connect you to dashboards by your connection date and in accordance with your staging timeline	Before connection	Section 12
Internal controls	Make sure your ISP maintains your connection to the ecosystem	After connection	Section 12
Record keeping	Keep a record of the evidence supplied by your ISP to demonstrate your connection to the ecosystem is maintained	After connection	Section 12
Policy	Decide on what personal data you will use to form your matching criteria for both your main scheme and AVC	Before connection	Section 14
Policy	Keep your matching criteria policy under review	After connection	Section 14
Record keeping	Keep a record of your matching criteria, for at least six years from the end of the scheme year in which you made that decision	Before and after connection	Sections 7 & 14
Record keeping	Keep a record of how you decided on your matching criteria and the parties you communicated with	Before and after connection	Sections 7 & 14
Governance	Produce or update your Data Protection Impact Assessment (DPIA) to take account of your matching criteria policy decision	Before connection	Section 14

Topic	Connection tasks	Due date	More information
Governance	Update your DPIA where your matching policy changes	After connection	Section 14
Internal controls	Assess if the personal data that forms your matching criteria – main scheme personal data and AVC personal data, is accurate and digitally accessible	Before connection	Section 14
Internal controls	If required, put plans in place to improve the accuracy and digital accessibility of the personal data – both main scheme and AVCs, to be used for matching	Before connection	Sections 7 & 14
Internal controls	If you put plan in place to improve the accuracy and digital accessibility of the personal data that forms your matching criteria – both main scheme and AVCs, confirm the plan has delivered its improvements	Before and after connection	Sections 7 & 14
Internal controls	Ensure you have a process in place to maintain the accuracy and accessibility of the personal data used to form your matching criteria – both main scheme and AVCs	After connection	Sections 7 & 14
Data	Understand what main scheme view data you need to return for members who access dashboards and in what timescale	Before connection	Sections 15, 16 & 17
Policy	Agree with your AVC provider(s) how your AVC view data will be sent to the ecosystem	Before connection	Sections 15 & 16

Topic	Connection tasks	Due date	More information
Policy	Consider using the template MOU to clarify how your AVC provider(s) will meet their dashboard and data protection duties, whether using a single or multiple-source approach – implement accordingly	After connection	Section 15
Internal controls	Multiple source Monitor your AVC provider(s) progress to connect to the ecosystem by your ‘connect by’ date	Before connection	Sections 7, 12, 15, 16 & 17
Internal controls	Single source Confirm you can store your AVC view data in a digitally accessible mode	Before connection	Sections 15, 16 & 17
Internal controls	Single source Agree the frequency and format by when your AVC view data will be sent to you by your AVC provider(s)	Before connection	Sections 15, 16, & 17
Policy	Decide whether to name the most recent employers (maximum 10) or confirm if there are multiple employers and inform your ISP – applicable to main scheme benefits and AVCs	Before connection	Section 16

Topic	Connection tasks	Due date	More information
Data	Where single source approach is used, agree with your AVC provider(s) with whom the member should contact to find out more about their AVC benefits and inform your ISP	Before connection	Section 16
Data	Complete the check list of decisions concerning value data in appendix two	Before connection	Section 16
Data	Agree the AVC illustration date with your AVC providers and where approach 2 is used inform your ISP	Before connection	Section 16
Data	Agree with your AVC provider(s) if you are going to provide AVC projections in certain circumstances and where approach 2 is used inform your ISP	Before connection	Section 16
Data	Agree with your AVC provider(s) your AVC payable dates and where approach 2 is used inform your ISP	Before connection	Section 16
Record keeping	Keep a record of how you agreed your AVC illustration date and the parties you communicated with in doing so	Date of decision	Sections 7 & 16
Record keeping	Keep a record of how you agreed whether to provide AVC projections in certain circumstances and the parties you communicated with in doing so	Date of decision	Sections 7 & 16

Topic	Connection tasks	Due date	More information
Record keeping	Keep a record of how you agreed your AVC payable dates and the parties you communicated with in doing so	Date of decision	Sections 7 & 16
Data	Where your main scheme value data is already stored - check your pensions administration software system to make sure you can send this data to the ecosystem within the statutory timescales	Before connection	Section 17
Data	Where your main scheme value data is out of date or you do not have value data stored on your pensions administration software, you will need to decide how and on what illustration date you are going to calculate this data and send it to the ecosystem within the statutory timescales	Before connection	Section 17
Data	Consider introducing monthly data contributions (MDC) to achieve the timescales set out in this section	Before connection	Section 17
Data	AVCs – check your AVC provider(s) can facilitate the approach you adopt ie single or multiple source and provide data within the statutory timescales	Before connection	Section 17
Data	Decide how you are going to calculate main scheme value data and what illustration date you will use when providing the data to the ecosystem within the timescales set out later in this section	Before connection	Section 17

Topic	Connection tasks	Due date	More information
Data	AVCs – agree with your AVC provider(s) how they are going to calculate AVC value data, what illustration date will be used and how they will provide that data to you (single source) or direct to the ecosystem (multiple source). Record keeping action	Before connection	Section 17
Record keeping	Keep a record of how you decided / agreed to calculate main scheme and AVC value data, including where the value data is out of date or not present and the parties who you communicated with in doing so	Date of your decision	Sections 7 & 17
Governance	You must: understand the operational information requirements; your responsibilities; discuss the operational information requirements with your ISP; and create separate processes to provide operational information that lies outside of the ecosystem and maintain these processes after connection	Before and after connection	Section 18
Record keeping	You must keep operational information for at least six years from the end of the scheme year to which it relates	Before and after connection	Section 18
Internal controls	You must create a plan to record the operational information and regularly review your plan to make sure the operational information is recorded and maintained	Before and after connection	Section 18

Topic	Connection tasks	Due date	More information
Internal controls	You must have processes in place to identify breaches of the law and, if necessary, report them to TPR	From the DAP	Section 7
Internal controls	You must have risk management processes in place, including processes for monitoring the resolution of issues between the scheme and any relevant third parties	Before and after connection	Section 7
Record keeping	You must keep clear audit trails of how you took steps to prepare to comply with your pensions dashboards duties	Before and after connection	Throughout this guide
Record keeping	You must keep a record of steps taken to resolve any issues that arose, such as communications with third parties	Before and after connection	Throughout this guide
Record keeping	You must keep a record of compliance as set out in MaPS reporting standards	Before and after connection	Sections 7 & 19
Internal controls	You must have processes in place to monitor compliance and report breaches where necessary	After connection	Sections 7 & 19
Internal controls	Regularly review the implementation of connecting to the ecosystem and determine if any breaches have occurred – report any breaches to TPR if necessary.	After connection	Sections 7 & 19

Topic	Connection tasks	Due date	More information
Internal controls	Once connected to the ecosystem regularly review your connection to make sure you can find savers and return data as expected – report any breaches to TPR if necessary.	After connection	Sections 7 & 19

22. Appendix two – value data checklist

PDWG guidance.

You will need to review the summary of challenges set out in table two when providing value data to the ecosystem. To help you be consistent in providing value data, we have set out our recommendation to each challenge which is documented in detail, in the Values guidance produced by PASA.

The PASA Values guidance is designed to provide 'good practice' recommendations to deal with several common issues not addressed by legislation or standards. It was prepared by a group of practitioners from across the pensions industry (including the Local Government Association) and has been discussed with TPR and MaPS. The guidance does not represent definitive views on the issues raised and is not a substitute for professional advice. Many of the issues covered are scheme specific and there is unlikely to be one size that fits all.

Once you have made your decisions, you will need to record these decisions together with the reasons why you made them.

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The challenge	LGA recommendation
Calculations stored on call Where value data cannot be drawn from an annual benefit statement produced in the last 13 months or a calculation performed within the last 12 months, decide whether to: • calculate value data each time a dashboards user requests view data? or • draw this data from a monthly bulk annual benefit statement calculation - a stored calculation?	We recommend you draw value data from a stored calculation derived from a monthly bulk annual benefit statement routine
Revaluation of deferred benefits How to revalue benefits for deferred members?	We recommend you include pensions increase calculated up to the illustration date
Rounding Whether value data should be provided exact or be rounded?	We recommend you follow your existing approach in how you quote values on your annual benefit statements

The challenge	LGA recommendation
Members over normal pension age How to calculate value data for members over their normal pension age?	Where a member is • not able to defer payment of their benefits beyond normal pension age – payment under the 1995 Scheme, we recommend returning 'details not available' plus administrative data. This is because the benefits should already be in payment and not displayed on dashboards • able to defer payment of their benefits beyond normal pension age – payment under the 1998 and later schemes, we recommend using the scheme's last year-end date – 31 March, as the illustration date. Actuarial increases for late payment should also be included
Members with benefits containing different payment ages How to calculate value data where a member has tranches of membership within a single benefit payable unreduced from different dates?	We recommend you quote a single value as at: • the illustration date for accrued benefits, and • normal pension age for estimated retirement income
Payment characteristics How to indicate whether survivor benefits are present where the member has different tranches of membership within a single benefit?	We recommend you return an indicator to show the value data includes contingent survivors' benefits

The challenge	LGA recommendation
GMP equalisation Whether to account for GMP equalisation in value data?	GMP equalisation for public service pension schemes is under review by HMT and sponsoring government departments. Until the outcome is known, GMP equalisation cannot be accounted for within value data
GMP stalemate cases Whether to include individuals who HMRC shows as entitled to a GMP, but you believe the GMP did not accrue in your fund or has been extinguished?	It was agreed with HMRC in 2019, any queries of this nature will be raised with HMRC using their standard business as usual approach. At that time, you were recommended not to record such individuals on your pensions administration software system – because you believed they were not a member of the LGPS. Therefore, we recommend excluding these individuals as you should not hold a record of them on your pensions administration software system
Benefit underpins and guarantees How to calculate value data for members with a GMP?	We recommend you do not include the GMP when calculating value data unless the member has passed the age at which GMPs are payable – age 60 for a woman and age 65 for a man. If this is the case, where appropriate, you should uplift the value data to reflect the amount of the GMP

The challenge	LGA recommendation
Split administration and AVCs Whether AVC view data should be provided to dashboards by you or your AVC provider(s)?	Since the PASA Values guidance was published, more information has come to light. We initially recommended your AVC provider(s) return AVC view data directly to dashboards with a unique identifier to link the AVCs with their main scheme benefits. However, we have since discovered this approach may not be possible with certain providers and we urge you to talk to your AVC providers as soon as possible. See AVCs and dashboards in section one of this guide for more information
Pension debits How to display value data where members benefits are subject to a pension debit?	We recommend you follow your existing approach in how you show pension debits on your annual benefit statements
Scheme pays How to display value data where members benefits are subject to a scheme pays debit?	We recommend you follow your existing approach in how you show scheme pays debits on your annual benefit statements
Multiple benefits held separately in the same scheme How to display view data where the member holds more than one benefit in the LGPS?	We recommend view data for each benefit should be supplied to dashboards separately

The challenge	LGA recommendation
Transfers in and additional benefits How to display additional benefits attributed to a transfer in, purchased by a member or awarded by an employer within value data?	We recommend you include all additional benefits within the value data without separating them out
What triggers a data refresh You will need to return value data which is, no more than 12 or 13 months out of date depending on where the data is retrieved. However, circumstances change far more frequently than that, and you will need to decide what changes in circumstances warrant dashboards' data being refreshed?	We recommend you refresh your data at the very minimum monthly, so that value data can be drawn from data that is always within a month old. If you refresh your data regularly, you will need to consider what illustration date you use to calculate accrued values
Flexible retirement Whether to display the unpaid view data, for members who have partially taken payment of their benefits? This can arise where the member has taken: • partial flexible retirement and not remained a contributing member in the LGPS • partial or whole flexible retirement and remained a contributing member in the LGPS	DWP have confirmed – see DWP response in appendix three, that the unpaid view data / continued accrual view data is not in scope of the regulations. This means the data will not be displayed on dashboards

The challenge	LGA recommendation
Suspended Tier 3 ill health benefits Whether to display view data where Tier 3 ill health benefits have been suspended?	DWP have confirmed - see DWP response in appendix three, that while the pension is in payment, and the member is a pensioner member, they would be out of scope of the regulations, and the data would not be displayed on dashboards. Though once payment of the pension (of up to 3 years) ceases and the pension becomes suspended – thus making the member a deferred member – they would be in scope of the regulations and data will be displayed on dashboards
Frozen refunds Should members with frozen refunds be treated as relevant members for dashboard purposes.	We have obtained guidance from DWP who have indicated such members should not be treated as relevant members for dashboard purposes. See DWP response in appendix three
Undecided leavers These are cases where you have been notified of a leaver, but you have not yet calculated the benefits. It can be manually set by you or automatically set by some pensions administration systems when a leaver is processed. Not all pensions administration systems offer this temporary status.	This challenge came to light after the publication of the PASA value data guidance. Consequently, it is not contained in that guidance. Not all undecided leavers are in the scope of dashboards – such as refunds, transfers out, retirements etc. However, some undecided leavers will ultimately be deferred benefits. MaPS have advised you will need to send undecided leavers to dashboards indicating the data is unavailable as a transaction is outstanding. Your ISP will be able to help you further with these cases.

23. Appendix three - regulatory queries

AVC payable date

This query looks at if the AVC payable date and if it must be the same as the main scheme benefits – ie the defined benefits.

A software supplier raised this query with PDP on 29 September 2023. On 5 October 2023 PDP confirmed they believe this will be a decision for each scheme based on the scheme's structure and design. We have therefore included reference to making this decision within the actions in this guide.

PDP response:

> "Having checked with colleagues they have advised that they think this will be a decision for the scheme based on its structure and design."

AVC value data return times

This query is about the timescale in which AVC value data must be returned to dashboards.

The response from MaPS indicates that if the AVC value data is returned by you or directly by the AVC provider, the data must be returned immediately where the value has been generated for a statement provided to a member within the past 13 months or is based on a calculation made within the past 12 months – or where this does not apply within 10 working days from when a PeI is registered for a confirmed pension or from the date it is re-registered as a confirmed pension.

MaPS response:

> "The 3-day rule only applies where all the benefits are money purchase, otherwise, the scheme has 10 days to return the value data. See below extract from the Government's summary of key policies related to the dashboard regulations
>
> Response times
>
> In relation to response times, there have been no changes. The regulations outline that:
>
> Administrative data must be provided immediately after a view request has been received.

> Where value data has been generated for a statement provided to the member within the past 13 months or is based on a calculation made within the past 12 months, it must be returned immediately.
>
> Where a new calculation must be made and where all benefits provided to a member are money purchase benefits, value data must be returned within 3 working days.
>
> In all other cases where a new calculation must be made (including where the benefits provided to a member are hybrid benefits which depend on anything other than a money purchase calculation), it must be returned within 10 working days.
>
> Response times apply from the date on which a PeI is registered for a positive match or from the date on which it is re-registered as a match made (from a possible match)."

Benefits partially paid or suspended

This query concerns classes of benefits that appear to be out of scope of the Regulations. DWPs response to the draft pensions dashboards regulations states at paragraph 5.65:

> "As set out in the consultation, pensioner members, non-UK based schemes and schemes that are non-registrable by TPR (subject to exceptions) will remain out of scope of the Regulations."

We are unclear if the following unpaid benefits should be displayed on dashboards:

- unpaid benefits following flexible retirement – either where the member has partially drawn their benefit, or wholly drawn their benefits and remained in the LGPS thereafter
- pensioner members with deferred benefits – following the suspension of a tier 3 ill health pension
- benefits that are abated.

DWP response:

> "Instance 1 – flexible retirement. Our interpretation is that the members that would fall into the examples you provided are not in scope of the regulations.
>
> Instance 2 – suspended tier 3 ill health pension. Our interpretation is that while the pension is in payment, and the member is a pensioner member, they would

> be out of scope, though once payment of the pension (of up to 3 years) ceases and the pension becomes suspended – thus making the member a deferred member – they would be in scope of the regulations.
>
> You also asked a question about abatement. Though admittedly I am not an expert on situations like this, I agree with your interpretation that these members remain pensioner members and would therefore be out of scope of receiving value data."

Definition of 'statement'

Regulations 26(5)(a) and 26(8)(a) of the Pensions Dashboards Regulations 2022

For defined benefit occupational pension schemes, statement is defined as a statement produced in relation to Part 5 of the Disclosure Regulations. In the earlier version of the draft Pensions Dashboards Regulations 'statement' was never defined. Regulation 16 of the Disclosure regulations only applies to non-money purchase statements provided to the member upon request, not annual benefit statements issued under the Public Service Pensions Act 2013 or public service pension scheme statutory regulations. So, this means, the LGPS will never meet the first bullet point and will solely rely on 'a calculation performed for the member within the last 12 months' when returning value data immediately. Or if a calculation has not been performed in the last 12 months, value data must be returned within 10 days. So, for all annual benefit statements issued between 12 to 13 months ago, return data will fall into the 10 day period.

DWP response:

> "We see how the definition of statement we have referred to in the Dashboard Regulations is problematic for public sector pension schemes, and it is our policy intent that when the regulations refer to statements, that this *includes* those provided under the Public Service Pensions Act 2013 are acceptable – so we are content for that interpretation to be used. We're looking to clarify this with TPR in their guidance and when we have the opportunity, may look at changes to the Dashboard Regulations."

Frozen refunds

DWP confirmed:

> “As these frozen refunds are not considered to be member benefits I’m afraid they will be out of scope for initial dashboards. This does not mean they cannot be included at some point in the future but for now we’ve had to prioritise getting the regulations right for the benefits that are in scope.
>
> We’ll keep this logged as an issue to look at again at the next suitable juncture. We want to legislate for schemes with fewer than 100 relevant members at some point, so there is bound to be further dashboards regulation in the not too distant future.”

24. 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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